Department of the Interior
U.S. Fish and Wildlife Service

OMB No. 1018-0164
Expires 11/30/2016

Federal Fish and Wildlife Permit Application Form

NOV 16 2017

Return to: U.S. Fish and Wildlife Service
Division of Management Authority (DMA)
Branch of Permits, MS: IA
5275 Leesburg Pike
Falls Church, VA 22041-3803
1-800-358-2104 or 703-358-2104

Type of Activity:
Import of Sport-hunted Trophies of Southern African Leopard, African Elephant, and Namibian Southern White Rhinoceros

Complete Sections A or B, and C, D, and E of this application. U.S. address may be required in Section C, see instructions for details.
See attached instruction pages for information on how to make your application complete and help avoid unnecessary delays.

A. Complete if applying as an individual

1.a. Last name	1.b. First name	1.c. Middle name or initial	1.d. Suffix
Staton	Edward	(b) (6)	

2. Date of birth (mm/dd/yyyy)	3. Occupation	4. Affiliation/ Doing business as (see instructions)
(b) (6)		

5.a. Telephone number	5.b. Alternate telephone number	5.c. Fax number	5.d. E-mail address
(b) (6)			(b) (6)

B. Complete if applying on behalf of a business, corporation, public agency, Tribe, or institution

1.a. Name of business, agency, Tribe, or institution	1.b. Doing business as (dba)

2. Tax identification no.	3. Description of business, agency, Tribe, or institution

4.a. Principal officer Last name	4.b. Principal officer First name	4.c. Principal officer Middle name/ initial	4.d. Suffix

5. Principal officer title	6. Primary contact name

7.a. Business telephone number	7.b. Alternate telephone number	7.c. Business fax number	7.d. Business e-mail address

C. All applicants complete address information

1.a. Physical address (Street address, Apartment #, Suite #, or Room #; no P.O. Boxes)
(b) (6)

1.b. City	1.c. State	1.d. Zip code/Postal code	1.e. County/Province	1.f. Country
Plano	TX	(b) (6)		USA

2.a. Mailing Address (include if different than physical address; include name of contact person if applicable)

2.b. City	2.c. State	2.d. Zip code/Postal code	2.e. County/Province	2.f. Country

D. All applicants MUST complete

1. Attach check or money order payable to the U.S. FISH AND WILDLIFE SERVICE **in the amount of $100, nonrefundable processing fee**. Federal, Tribal, State, and local government agencies, and those acting on behalf of such agencies, are exempt from the processing fee – ***attach documentation of fee exempt status as outlined in instructions.*** (50 CFR 13.11(d))

2. Do you currently have or have you ever had any Federal Fish and Wildlife permits?
Yes ☑ If yes, list the number of the most current permit you have held or that you are applying to renew/re-issue. 17US24213C/9 No ☐

3. Certification. I hereby certify that I have read and am familiar with the regulations contained in ***Title 50, Part 13 of the Code of Federal Regulations*** and the other ***applicable parts in subchapter B of Chapter I of Title 50***, and I certify that the information submitted in this application for a permit is complete and accurate to the best of my knowledge and belief. I understand that any false statement herein may subject me to the criminal penalties of 18 U.S.C. 1001.

Signature of applicant/person responsible for permit (No photocopied or stamped signatures) — Date of signature (mm/dd/yyyy): 11/14/2017

Please continue to next page

E. IMPORT OF SPORT-HUNTED TROPHIES OF SOUTHERN AFRICAN LEOPARD, AFRICAN ELEPHANT, AND NAMIBIAN SOUTHERN WHITE RHINOCEROS

Note 1: If you hold an import permit for a trophy/trophies that you did not use, please **return the unused original permit.** If you are requesting reissuance of a permit because you have taken a trophy, but were unable to import it prior to the expiration of the permit, please use the renewal form (3-200-52; http://www.fws.gov/international/permits/by-form-number/index.html) and return your original permit with that form.

Note 2: *Sport-hunted trophy* is defined at 50 CFR 23.74 as follows: *Sport-hunted trophy* means a whole dead animal or a readily recognizable part or derivative of an animal specifically identified on the accompanying CITES document that meets the following criteria:

(1) Is raw, processed, or manufactured;
(2) Was legally obtained by the hunter through hunting for his or her personal use;
(3) Is being imported, exported, or re-exported by or on behalf of the hunter as part of the transfer from its country of origin ultimately to the hunter's country of usual residence; and
(4) Includes worked, manufactured, or handicraft items made from the sport-hunted animal only when:
  (i) Such items are contained in the same shipment as raw or tanned parts of the sport-hunted animal and are for the personal use of the hunter;
  (ii) The quantity of such items is no more than could reasonably be expected given the number of animals taken by the hunter as shown on the license or other documentation of the authorized hunt accompanying the shipment; and
  (iii) The accompanying CITES documents (export document and, if appropriate, import permit) contain a complete itemization and description of all items included in the shipment.

Note 3: Certain hunting trophies, including leopard, elephant, and rhinoceros hunting trophies, are subject to restrictions on their use after import into the United States. Please see 50 CFR 23.55 for more information or contact the Division of Management Authority.

Please provide the following information. Complete all questions on the application. Mark questions that are not applicable with "N/A". If applying for more than one trophy, be sure to answer questions 2 and 3 for each trophy.

If importing trophies from more than one country, you must submit a separate application for each shipment in order to obtain separate import permits.

1. ENTER the quantity next to the name of the species you are applying to import (you may apply to import specimens of more than one species provided they have been/are being hunted in the same country):

Leopard (*Panthera pardus*) Quantity:_____(Import is limited to two per hunter per calendar year)

African elephant (*Loxodonta africana*) Quantity:__1__(Import is limited to two per hunter per calendar year)
Note: once imported, ivory cannot be re-exported.

Southern white rhinoceros (*Ceratotherium simum simum*) from Namibia Quantity:_____ (An import permit is not required for trophies harvested in South Africa or Swaziland. If you wish to import from a different country, please use form 3-200-37).

2. **IF ANIMAL IS CURRENTLY LIVING IN THE WILD,** please enter the following:
   a. Country and place (area, region, GIS coordinates, ranch AND nearest city) where wildlife is to be taken from the wild:

   b. Date wildlife is to be hunted:

c. Description of the trophy and parts you intend to import (e.g., skin, skull, shoulder mount, life size mount, claws, horns, tusks).

3. **IF THE ANIMAL IS DEAD,** please enter the following:
   a. Country and place (area, region, GIS coordinates, ranch, and/or AND nearest city) where trophy was removed from the wild: South Africa, Limpopo, Mopani, Croc Ranch, Pretoria

   b. Date wildlife was hunted: 30Jul2016

   c. Description of the trophy and parts you intend to import (e.g., skin, skull, shoulder mount, life size mount, claws, horn, tusks):

      Skull, Tusks, Skin

   d. The current location of the trophy (address and country) [the U.S. import permit will identify this country as the country of export/re-export and must match with the export/re-export document]:

      7 Aluminium Road, White River, Mpumalanga 1240, South Africa

4. Complete name and address of overseas person or business shipping the trophy to you. If you are applying to import a trophy directly from Namibia, you **must** provide the name and address of the professional hunter listed on your Namibian hunting permit [this name will appear on the face of the export permit].

Name: Business Name:	Life Form Taxidermy
Address:	7 Aluminium Road
City:	White River
State/Province:	Mpumalanga
Country, Postal Code:	South Africa, 1240

5. Please be aware that the U.S. Fish and Wildlife Service may need to make a finding that your activities will enhance or benefit wild populations of the species involved. If you have any information that could support this finding (e.g., how the funds from license/trophy fees will be spent, what portion of the hunting fee will support conservation), please submit such information on a separate page with your application.

CERTIFICATION STATEMENT (original signature must be provided for either 6 or 7 below)

6. **If you are a broker or taxidermist applying on behalf of a foreign national,** provide documentation to show you have a **Power of Attorney** to act on your client's behalf and sign the following statement.

   I acknowledge that the sport-hunted trophy/trophies to be imported has been/will be personally hunted by my client and is being imported only for my client's personal use (i.e., **not for sale, transfer, donation, or exchange that is reasonably likely to result in economic use, gain, or benefit**). I understand that my client may only import two leopard trophies in one calendar year. I understand that my client may only import two African elephant trophies in one calendar year. In addition, I have advised my client that raw ivory, once imported into the United States, cannot be re-exported.

   Taxidermist/Broker's signature:_____ Date: _____

7. **If you are the hunter applying to import your own trophy**, please read and sign the following statement.

I acknowledge that the sport-hunted trophy/trophies to be imported has been/will be personally hunted by me and is being imported only for my personal use (i.e., **not for sale, transfer, donation, or exchange that is reasonably likely to result in economic use, gain, or benefit**). I understand that I may only import two leopard trophies in one calendar year. I understand that I may only import two African elephant trophies in one calendar year. In addition, I understand that raw ivory, once imported into the United States, cannot be re-exported.

Applicant's signature: _____ Date: 11/14/2017

Be aware that there may be additional permitting or approval requirements by your local or state governments, as well as required by other Federal agencies or foreign government to conduct your propose activity. While the Service will attempt to assist where possible, it is your responsibility to obtain such approval.

8. All international shipment(s) must be through a designated port. A list of designated ports (where an inspector is posted) is available from http://www.fws.gov/le/designated-ports.html. If you wish to use a port not listed, please contact the Office of Law Enforcement for a Designated Port Exemption Permit (form 3-200-2).

9. Name and address where you wish the permit to be mailed, **if** different from page 1 (All permits will be mailed via the U.S. Postal Service, unless you identify an alternative means below):

10. If you wish the permit to be delivered by means other than USPS regular mail, provide an air bill, pre-paid envelope, or billing information. If you do not have a pre-paid envelope or air bill and wish to pay for a courier service with your credit card, please check the box below. Please DO NOT include credit card number or other information; you will be contacted for this information.

☐ If a permit is issued, please send it via a courier service to the address on page 1 or question 9. I understand that you will contact me for my credit card information once the application has been processed.

11. Who should we contact if we have questions about the application? (Include name, phone number, and email):

Edward (b) (6) Staton, (b) (6) [redacted]

12. **Disqualification Factor.** A conviction, or entry of a plea of guilty or nolo contendere, for a felony violation of the Lacey Act, the Migratory Bird Treaty Act, or the Bald and Golden Eagle Protection Act disqualifies any such person from receiving or exercising the privileges of a permit, unless such disqualification has been expressly waived by the Service Director in response to a written petition. (50 CFR 13.21(c)) Have you or any of the owners of the business, if applying as a business, been convicted, or entered a plea of guilty or nolo contendere, forfeited collateral, or are currently under charges for any violations of the laws mentioned above?

☐ Yes ☑ No If you answered "Yes" provide: a) the individual's name, b) date of charge, c) charge(s), d) location of incident, e) court, and f) action taken for each violation.

Bank of America

Cashier's Check

No. 1432814683

Notice to Purchaser - In the event that this check is lost, misplaced or stolen, a sworn statement and 90-day waiting period will be required prior to replacement. This check should be negotiated within 90 days.

Void After 90 Days

30-1/1140
NTX

Date 11/10/17 02:26:38 PM

HUNTINGTON AVE
0005 0081345 0150

Pay BANK OF AMERICA ONE ZERO ZERO CTSCTS **$100.00**

One Hundred and 00/100 Dollars

To The Order Of US FISH AND WILDLIFE SERVICES

Remitter (Purchased By): EDWARD (b) STATON

Bank of America, N.A.
SAN ANTONIO, TX

AUTHORIZED SIGNATURE

⑈1432814683⑈ ⑆114000019⑆ 00164100538⑧⑈

THE ORIGINAL DOCUMENT HAS A REFLECTIVE WATERMARK ON THE BACK. HOLD AT AN ANGLE TO VIEW WHEN CHECKING THE ENDORSEMENTS.

Department of the Interior
U.S. Fish and Wildlife Service

OMB No. 1018-0164
Expires 11/30/2016

Federal Fish and Wildlife Permit Application Form

RCVD DEC 05 2017

LB

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Division of Management Authority (DMA)
Branch of Permits, MS: IA
5275 Leesburg Pike
Falls Church, VA 22041-3803
1-800-358-2104 or 703-358-2104

Type of Activity:
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See attached instruction pages for information on how to make your application complete and help avoid unnecessary delays.

A. Complete if applying as an individual

1.a. Last name	1.b. First name	1.c. Middle name or initial	1.d. Suffix
Ham	Garrett	(b) (6)	

2. Date of birth (mm/dd/yyyy)	3. Occupation	4. Affiliation/ Doing business as (see instructions)	
(b) (6)			

5.a. Telephone number	5.b. Alternate telephone number	5.c. Fax number	5.d. E-mail address
(b) (6)			(b) (6)

B. Complete if applying on behalf of a business, corporation, public agency, Tribe, or institution

1.a. Name of business, agency, Tribe, or institution	1.b. Doing business as (dba)		

2. Tax identification no.	3. Description of business, agency, Tribe, or institution		

4.a. Principal officer Last name	4.b. Principal officer First name	4.c. Principal officer Middle name/ initial	4.d. Suffix

5. Principal officer title	6. Primary contact name		

7.a. Business telephone number	7.b. Alternate telephone number	7.c. Business fax number	7.d. Business e-mail address

C. All applicants complete address information

1.a. Physical address (Street address; Apartment #, Suite #, or Room #; no P.O. Boxes)
(b) (6)

1.b. City	1.c. State	1.d. Zip code/Postal code:	1.e. County/Province	1.f. Country
Sahuarita	Az	(b) (6)		USA

2.a. Mailing Address (include if different than physical address; include name of contact person if applicable)

2.b. City	2.c. State	2.d. Zip code/Postal code:	2.e. County/Province	2.f. Country

D. All applicants MUST complete

1. Attach check or money order payable to the U.S. FISH AND WILDLIFE SERVICE **in the amount of $100, nonrefundable processing fee**. Federal, Tribal, State, and local government agencies, and those acting on behalf of such agencies, are exempt from the processing fee – ***attach documentation of fee exempt status as outlined in instructions.*** (50 CFR 13.11(d))

2. Do you currently have or have you ever had any Federal Fish and Wildlife permits?
Yes ☑ If yes, list the number of the most current permit you have held or that you are applying to renew/re-issue: 156171 No ☐

3. Certification: I hereby certify that I have read and am familiar with the regulations contained in ***Title 50, Part 13 of the Code of Federal Regulations*** and the other ***applicable parts in subchapter B of Chapter I of Title 50***, and I certify that the information submitted in this application for a permit is complete and accurate to the best of my knowledge and belief. I understand that any false statement herein may subject me to the criminal penalties of 18 U.S.C. 1001.

Signature of applicant/person responsible for permit (No photocopied or stamped signatures) — Date of signature (mm/dd/yyyy): 11-29-2017

Please continue to next page

E. IMPORT OF SPORT-HUNTED TROPHIES OF SOUTHERN AFRICAN LEOPARD, AFRICAN ELEPHANT, AND NAMIBIAN SOUTHERN WHITE RHINOCEROS

Note 1: If you hold an import permit for a trophy/trophies that you did not use, please **return the unused original permit**. If you are requesting reissuance of a permit because you have taken a trophy, but were unable to import it prior to the expiration of the permit, please use the renewal form (3-200-52; http://www.fws.gov/international/permits/by-form-number/index.html) and return your original permit with that form.

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(1) Is raw, processed, or manufactured;
(2) Was legally obtained by the hunter through hunting for his or her personal use;
(3) Is being imported, exported, or re-exported by or on behalf of the hunter as part of the transfer from its country of origin ultimately to the hunter's country of usual residence; and
(4) Includes worked, manufactured, or handicraft items made from the sport-hunted animal only when:
(i) Such items are contained in the same shipment as raw or tanned parts of the sport-hunted animal and are for the personal use of the hunter;
(ii) The quantity of such items is no more than could reasonably be expected given the number of animals taken by the hunter as shown on the license or other documentation of the authorized hunt accompanying the shipment; and
(iii) The accompanying CITES documents (export document and, if appropriate, import permit) contain a complete itemization and description of all items included in the shipment.

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Please provide the following information. Complete all questions on the application. Mark questions that are not applicable with "N/A". If applying for more than one trophy, be sure to answer questions 2 and 3 for each trophy.

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1. ENTER the quantity next to the name of the species you are applying to import (you may apply to import specimens of more than one species provided they have been/are being hunted in the same country):

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Southern white rhinoceros (*Ceratotherium simum simum*) from Namibia Quantity:_____ (An import permit is not required for trophies harvested in South Africa or Swaziland. If you wish to import from a different country, please use form 3-200-37).

2. **IF ANIMAL IS CURRENTLY LIVING IN THE WILD**, please enter the following:
   a. Country and place (area, region, GIS coordinates, ranch AND nearest city) where wildlife is to be taken from the wild:

   b. Date wildlife is to be hunted:

c. Description of the trophy and parts you intend to import (e.g., skin, skull, shoulder mount, life size mount, claws, horns, tusks).

3. **IF THE ANIMAL IS DEAD**, please enter the following:
   a. Country and place (area, region, GIS coordinates, ranch, and/or AND nearest city) where trophy was removed from the wild:

      S17 56'3.77" E23 44'7.63" Sobbe Camp Katima Mulilo, Namibia

   b. Date wildlife was hunted: Hunted March 18th. Through April 8th 2016

   c. Description of the trophy and parts you intend to import (e.g., skin, skull, shoulder mount, life size mount, claws, horn, tusks):

      Tanned skin and ears, Tusks, Finished foot stools, Hair, Skull

   d. The current location of the trophy (address and country) [the U.S. import permit will identify this country as the country of export/re-export and must match with the export/re-export document]:

      Yellow Shark Holdings
      PO Box 81413, Olympia
      Windhoek, Republic of Namibia

4. Complete name and address of overseas person or business shipping the trophy to you. If you are applying to import a trophy directly from Namibia, you **must** provide the name and address of the professional hunter listed on your Namibian hunting permit [this name will appear on the face of the export permit].

Name: Business	Yellow Shark Holdings
Name: Address:	PO Box 81413, Olympia
Address:	Windhoek, Republic of Namibia
City:	
State/Province:	
Country, Postal Code:	

5. Please be aware that the U.S. Fish and Wildlife Service may need to make a finding that your activities will enhance or benefit wild populations of the species involved. If you have any information that could support this finding (e.g., how the funds from license/trophy fees will be spent, what portion of the hunting fee will support conservation), please submit such information on a separate page with your application.

CERTIFICATION STATEMENT (original signature must be provided for either 6 or 7 below)

6. **If you are a broker or taxidermist applying on behalf of a foreign national,** provide documentation to show you have a **Power of Attorney** to act on your client's behalf and sign the following statement.

   I acknowledge that the sport-hunted trophy/trophies to be imported has been/will be personally hunted by my client and is being imported only for my client's personal use (i.e., **not for sale, transfer, donation, or exchange that is reasonably likely to result in economic use, gain, or benefit**). I understand that my client may only import two leopard trophies in one calendar year. I understand that my client may only import two African elephant trophies in one calendar year. In addition, I have advised my client that raw ivory, once imported into the United States, cannot be re-exported.

   Taxidermist/Broker's signature:_____ Date: _____

7. **If you are the hunter applying to import your own trophy**, please read and sign the following statement.

I acknowledge that the sport-hunted trophy/trophies to be imported has been/will be personally hunted by me and is being imported only for my personal use (i.e., **not for sale, transfer, donation, or exchange that is reasonably likely to result in economic use, gain, or benefit**). I understand that I may only import two leopard trophies in one calendar year. I understand that I may only import two African elephant trophies in one calendar year. In addition, I understand that raw ivory, once imported into the United States, cannot be re-exported.

Applicant's signature: _____ Date: 11-29-2017

Be aware that there may be additional permitting or approval requirements by your local or state governments, as well as required by other Federal agencies or foreign government to conduct your propose activity. While the Service will attempt to assist where possible, it is your responsibility to obtain such approval.

8. All international shipment(s) must be through a designated port. A list of designated ports (where an inspector is posted) is available from http://www.fws.gov/le/designated-ports.html. If you wish to use a port not listed, please contact the Office of Law Enforcement for a Designated Port Exemption Permit (form 3-200-2).

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10. If you wish the permit to be delivered by means other than USPS regular mail, provide an air bill, pre-paid envelope, or billing information. If you do not have a pre-paid envelope or air bill and wish to pay for a courier service with your credit card, please check the box below. Please DO NOT include credit card number or other information; you will be contacted for this information.

☐ If a permit is issued, please send it via a courier service to the address on page 1 or question 9. I understand that you will contact me for my credit card information once the application has been processed.

11. Who should we contact if we have questions about the application? (Include name, phone number, and email):

Garrett Ham
(b) (6) [redacted]

12. **Disqualification Factor**. A conviction, or entry of a plea of guilty or nolo contendere, for a felony violation of the Lacey Act, the Migratory Bird Treaty Act, or the Bald and Golden Eagle Protection Act disqualifies any such person from receiving or exercising the privileges of a permit, unless such disqualification has been expressly waived by the Service Director in response to a written petition. (50 CFR 13.21(c)) Have you or any of the owners of the business, if applying as a business, been convicted, or entered a plea of guilty or nolo contendere, forfeited collateral, or are currently under charges for any violations of the laws mentioned above?

☐ Yes ☑ No If you answered "Yes" provide: a) the individual's name, b) date of charge, c) charge(s), d) location of incident, e) court, and f) action taken for each violation.

Ndumo Safaris (Namibia) motivational letter for Enhancement permits for elephant and leopard imports into the USA:

Ndumo Safaris Ltd is a northeast Namibia based outfitter striving to combine sustained big game hunting with a focus on wildlife conservation within 3 vast concessions of land. The concession is managed in an integrated approach with both the Namibian Government and local communal conservancies to enhance and benefit wildlife through conservation. This partnership approach with Ndumo and the communal conservancies, which have been awarded hunting quotas on 3 hunting blocks.

This communal conservancies' model of adopted by Namibia, especially those with a hunting quota awarded, works very well in helping local, impoverished communities to:

1) Co- exist on land that has elephants and leopard on them
2) Derive an income from the animals that occur on their communal land, sometimes on land that is not really suitable for eco-tourism
3) Create core hunting areas where no or very few livestock enters, thus creating a wildlife only zone
4) Create buffer zones around dedicated National Parks and human habitation
5) Decrease human/ wild game conflict
6) Create employment opportunities for local communities
7) Provide local communities, that are often live below the bread line, with much needed protein in the form of game meat
8) Create funds for these communities to do their own anti-poaching
9) Create funds for the Game Products trust fund, which helps them in developing the areas for wildlife, compensate them for wildlife conflicts and educate them on the value of wildlife in the area.

Currently, we own and operate the following concessions in the Caprivi / Zambezi region of Namibia:

- Sobbe communal conservancy
- Sikunga communal conservancy
- The joint venture area called Bwabwata East or Kwando core area, inside the Bwabwata National Park.

The Namibian government has adopted integrated park management with the residents of the land on which the National Park is situated. Park residents are mostly from the Barakwena tribe, a Khwe San bushmen minority group. The residents have formed the Kyaramachan Association to represent them and manage income from tourism and trophy hunting. Ndumo has been awarded the trophy hunting concession from the Association. Ndumo Safaris pays close to US$ 550,000 to both the Namibian government and local communities in concession and license fees per annum.

We currently employ 33 people from the region, paying them around double what the minimum requirements are. These jobs thus support 33 families from the region, where any type of permanent employment is scarce.

We further provide over a 100 metric tonnes of meat to the local communities per annum, in the form of game meat from the animals harvested.

(b) (6) [redacted]

(b) (6) [redacted]

11-29-17
Date

Pay to the Order of US Fish and Wildlife Service $ 100.00

ONE Hundred and 00/100 Dollars

Photo Safe Deposit® Details on back

WELLS FARGO
Wells Fargo Bank, N.A.
Arizona
wellsfargo.com

© 1999 WFB, N.A. All rights reserved

For (b) (6) [redacted]

(b) (6) [redacted]

Department of the Interior
U.S. Fish and Wildlife Service

OMB No. 1018-0093
Expires 05/31/2017

RCVD DEC 15 2017

Federal Fish and Wildlife Permit Application Form

Return to: U.S. Fish and Wildlife Service
Division of Management Authority (DMA)
Branch of Permits, MS: IA
5275 Leesburg Pike
Falls Church, VA 22041-3803
1-800-358-2104 or 703-358-2104

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A. Complete if applying as an individual

1.a. Last name	1.b. First name	1.c. Middle name or initial	1.d. Suffix
KOBRIN	BRUCE	(b) (6)	

2. Date of birth (mm/dd/yyyy)	3. Social Security No.	4. Occupation	5. Affiliation/ Doing business as (see instructions)
(b) (6)			

6.a. Telephone number	6.b. Alternate telephone number	6.c. Fax number	6.d. E-mail address
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1.a. Name of business, agency, Tribe, or institution	1.b. Doing business as (dba)

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5. Principal officer title	6. Primary contact name

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(b) (6)

1.b. City	1.c. State	1.d. Zip code/Postal code:	1.e. County/Province	1.f. Country
LAS Vegas	Nevada	(b) (6)		U.S.A

2.a. Mailing Address (include if different than physical address; include name of contact person if applicable)

2.b. City	2.c. State	2.d. Zip code/Postal code:	2.e. County/Province	2.f. Country

D. All applicants MUST complete

1. Attach check or money order payable to the U.S. FISH AND WILDLIFE SERVICE **in the amount of $100, nonrefundable processing fee**. Federal, Tribal, State, and local government agencies, and those acting on behalf of such agencies, are exempt from the processing fee – ***attach documentation of fee exempt status as outlined in instructions.*** (50 CFR 13.11(d))

2. Do you currently have or have you ever had any Federal Fish and Wildlife permits?
Yes ☐ If yes, list the number of the most current permit you have held or that you are applying to renew/re-issue: _____ No ☒

3. Certification: I hereby certify that I have read and am familiar with the regulations contained in ***Title 50, Part 13 of the Code of Federal Regulations*** and the other ***applicable parts in subchapter B of Chapter I of Title 50***, and I certify that the information submitted in this application for a permit is complete and accurate to the best of my knowledge and belief. I understand that any false statement herein may subject me to the criminal penalties of 18 U.S.C. 1001.

Bruce (b) (6) Kobrin — 12/12/2017

Signature (**in blue ink**) of applicant/person responsible for permit (No photocopied or stamped signatures) — Date of signature (mm/dd/yyyy)

Please continue to next page

E. IMPORT OF SPORT-HUNTED TROPHIES OF SOUTHERN AFRICAN LEOPARD, AFRICAN ELEPHANT, AND NAMIBIAN SOUTHERN WHITE RHINOCEROS

Note 1: If you hold an import permit for trophy/trophies that you did not use, please **return the unused original permit**. If you are requesting reissuance of a permit because you have taken a trophy, but were unable to import it prior to the expiration of the permit, please use the renewal form (3-200-52; http://www.fws.gov/international/permits/by-form-number/index.html) and return your original permit with that form.

Note 2: The U.S. FWS has determined that a trophy consists of raw or tanned parts of a specimen taken by a hunter during a sport hunt for personal use. It may include the bones, claws, hair, head, hide, hooves, horns, meat, skull, teeth, tusks, or any taxidermied part, including, but not limited to, a rug or taxidermied head, shoulder, or full mount. It does not include articles made from a trophy, such as worked, manufactured, or handicraft items for use as clothing, curios, ornamentation, jewelry, or other utilitarian items. If you wish to import such products, please contact the Division of Management Authority for the proper application form.

Note 3: Certain hunting trophies, including leopard, elephant, and rhinoceros hunting trophies, are subject to restrictions on their use after import into the United States. Please see 50 CFR 23.55 for more information or contact the Division of Management Authority.

Please provide the following information. Complete all questions on the application. Mark questions that are not applicable with "N/A". If applying for more than one trophy, be sure to answer questions 2 and 3 for each trophy. If importing trophies from more than one country, you must submit a separate application for each shipment in order to obtain separate import permits.

1. ENTER the quantity next to the name of the species you are applying to import (you may apply to import specimens of more than one species provided they have been/are being hunted in the same country):

Leopard (*Panthera pardus*) Quantity: _____ (Limited to the import of two per calendar year)

African elephant (*Loxodonta africana*) Quantity: 1 (Import permit is not required for trophies harvested in Botswana, Namibia, South Africa, or Zimbabwe). **Note: once imported, ivory cannot be re-exported.**

Southern white rhinoceros (*Ceratotherium simum simum*) from Namibia Quantity: _____ (An import permit is not required for trophies harvested in South Africa or Swaziland. If you are looking to import from a different country, please use form 3-200-37).

2. **IF ANIMAL IS CURRENTLY LIVING IN THE WILD**, please enter the following:
   a. Country and place (area, region, GIS coordinates, ranch AND nearest city) where wildlife is to be taken from the wild: SOUTH AFRICA. GPS CO-ORDS IS 24 DEGREES 15' 35.40" SOUTH AND 30 DEGREES 55' 06.89" EAST. AREA/REGION OR PROVINCE IS LIMPOPO PROVINCE. CLOSEST TOWN OR CITY IS Hoedspruit
   b. Date wildlife is to be hunted: MARCH 19th THRU MARCH 26th 2018
   c. Description of the trophy and parts you intend to import (e.g., skin, skull, shoulder mount, life size mount, claws, horns, tusks). SKIN, TUSKS, TAIL, feet, ears

3. **IF THE ANIMAL IS DEAD**, please enter the following:
   a. Country and place (area, region, GIS coordinates, ranch, and/or AND nearest city) where trophy was removed from the wild:
   b. Date wildlife was hunted:

c. Description of the trophy and parts you intend to import (e.g., skin, skull, shoulder mount, life size mount, claws, horn, tusks):
SKIN, TUSKS, TAIL, FEET, EARS

d. The current location of the trophy (address and country) [the U.S. import permit will identify this country as the country of export/re-export and must match with the export/re-export document]:
SOUTH AFRICA, TOWN OR CITY IS HOEDSPRUIT

4. Complete name and address of overseas person or business shipping the trophy to you. If you are applying to import a trophy directly from Namibia, you **must** provide the name and address of the professional hunter listed on your Namibian hunting permit [this name will appear on the face of the export permit].

Name: RUPERT DEDEKIND
Business Name: UNIVERSAL TROPHY SERVICES
Address: PLOT 114 BASHEWA, PRETORIA 0056
Address:
City: PRETORIA
State/Province: SOUTH AFRICA
Country, Postal Code:

SAFARI AIR CARGO SYSTEM
34 5th AVE BRODELL A.H.
KEMPTON PARK
1619
PHONE 011 979-3770

5. Please be aware that the U.S. Fish and Wildlife Service may need to make a finding that your activities will enhance or benefit wild populations of the species involved. If you have any information that could support this finding (e.g., how the funds from license/trophy fees will be spent, what portion of the hunting fee will support conservation), please submit such information on a separate page with your application.

CERTIFICATION STATEMENT (original signature must be provided for either 6 or 7 below)

6. **If you are a broker or taxidermist applying on behalf of a foreign national,** provide documentation to show you have a **Power of Attorney** to act on your client's behalf and sign the following statement.

I acknowledge that the sport-hunted trophy/trophies to be imported has been/will be personally hunted by my client and is being imported only for my client's personal use (i.e., **not for sale, transfer, donation, or exchange that is reasonably likely to result in economic use, gain, or benefit**). I understand that my client may only import two leopard trophies in one calendar year (if applicable). In addition, I have advised my client that raw ivory, once imported into the United States, cannot be re-exported.

Taxidermist/Broker's signature: _____ Date: _____

7. **If you are the hunter applying to import your own trophy**, please read and sign the following statement.

I acknowledge that the sport-hunted trophy/trophies to be imported has been/will be personally hunted by me and is being imported only for my personal use (i.e., **not for sale, transfer, donation, or exchange that is reasonably likely to result in economic use, gain, or benefit**). I understand that I may only import two leopard trophies in one calendar year (if applicable). In addition, I understand that raw ivory, once imported into the United States, cannot be re-exported.

Applicant's signature: Bruce Kohn Date: 12/11/2017

Be aware that there may be additional permitting or approval requirements by your local or state governments, as well as required by other Federal agencies or foreign government to conduct your propose activity. While the Service will attempt to assist where possible, it is your responsibility to obtain such approval.

8. All international shipment(s) must be through a designated port. A list of designated ports (where an inspector is posted) is available from http://www.fws.gov/le/designated-ports.html. If you wish to use a port not listed, please contact the Office of Law Enforcement for a Designated Port Exemption Permit (form 3-200-2).

I will use
FAUNA AND FLORA, A division of HIA Logistics
152-31 135th Avenue, Jamaica, New York 11434
FAX 718-276-3300

9. Name and address where you wish the permit to be mailed, **if** different from page 1 (All permits will be mailed via the U.S. Postal Service, unless you identify an alternative means below):

SAME AS Listed

10. If you wish the permit to be delivered by means other than USPS regular mail, provide an air bill, pre-paid envelope, or billing information. If you do not have a pre-paid envelope or air bill and wish to pay for a courier service with your credit card, please check the box below. Please DO NOT include credit card number or other information; you will be contacted for this information.

☐ If a permit is issued, please send it via a courier service to the address on page 1 or question 9. I understand that you will contact me for my credit card information once the application has been processed.

11. Who should we contact if we have questions about the application? (Include name, phone number, and email):

Mike Red KOBRIN (b) (6) Las Vegas, Nevada
(b) (6)
(b) (6)

12. **Disqualification Factor**. A conviction, or entry of a plea of guilty or nolo contendere, for a felony violation of the Lacey Act, the Migratory Bird Treaty Act, or the Bald and Golden Eagle Protection Act disqualifies any such person from receiving or exercising the privileges of a permit, unless such disqualification has been expressly waived by the Service Director in response to a written petition. (50 CFR 13.21(c)) Have you or any of the owners of the business, if applying as a business, been convicted, or entered a plea of guilty or nolo contendere, forfeited collateral, or are currently under charges for any violations of the laws mentioned above?

☐ Yes ☒ No If you answered "Yes" provide: a) the individual's name, b) date of charge, c) charge(s), d) location of incident, e) court, and f) action taken for each violation.

RCVD DEC 15 2017

BRUCE (b) KOBRIN
(b) (6)
LAS VEGAS NV (b) (6)

Cash Management Account®

(b) (6)

12/12/2017
DATE

PAY TO THE ORDER OF U.S. FISH AND WILDLIFE SERVICE $ 100.00

One Hundred 00/100 DOLLARS

Security Features Details on Back.

Merrill Lynch
Bank of America Corporation

FOR Elephant Permit

(b) (6)

RCVD JAN 24 2018

OMB No. 1018-0164
Expires 11/30/2016

Department of the Interior
U.S. Fish and Wildlife Service

Federal Fish and Wildlife Permit Application Form

Return to: U.S. Fish and Wildlife Service
Division of Management Authority (DMA)
Branch of Permits, MS: IA
5275 Leesburg Pike
Falls Church, VA 22041-3803
1-800-358-2104 or 703-358-2104

Type of Activity:
Import of Sport-hunted Trophies of Southern African Leopard, African Elephant, and Namibian Southern White Rhinoceros

Complete Sections A or B, and C, D, and E of this application. U.S. address may be required in Section C, see instructions for details.
See attached instruction pages for information on how to make your application complete and help avoid unnecessary delays.

A. Complete if applying as an individual

1.a. Last name	1.b. First name	1.c. Middle name or initial	1.d. Suffix
Sanson	David	(b)	

2. Date of birth (mm/dd/yyyy)	3. Occupation	4. Affiliation/ Doing business as (see instructions)	
(b) (6)			

5.a. Telephone number	5.b. Alternate telephone number	5.c. Fax number	5.d. E-mail address
(b) (6)			(b) (6)

B. Complete if applying on behalf of a business, corporation, public agency, Tribe, or institution

1.a. Name of business, agency, Tribe, or institution	1.b. Doing business as (dba)		

2. Tax identification no.	3. Description of business, agency, Tribe, or institution		

4.a. Principal officer Last name	4.b. Principal officer First name	4.c. Principal officer Middle name/ initial	4.d. Suffix

5. Principal officer title	6. Primary contact name

7.a. Business telephone number	7.b. Alternate telephone number	7.c. Business fax number	7.d. Business e-mail address

C. All applicants complete address information

1.a. Physical address (Street address; Apartment #, Suite #, or Room #; no P.O. Boxes)
(b) (6)

1.b. City	1.c. State	1.d. Zip code/Postal code:	1.e. County/Province	1.f. Country
Walnut Creek	CA	(b) (6)		USA

2.a. Mailing Address (include if different than physical address; include name of contact person if applicable)
(b) (6)

2.b. City	2.c. State	2.d. Zip code/Postal code:	2.e. County/Province	2.f. Country
Concord	CA	(b) (6)		USA

D. All applicants MUST complete

1. Attach check or money order payable to the U.S. FISH AND WILDLIFE SERVICE **in the amount of $100, nonrefundable processing fee.** Federal, Tribal, State, and local government agencies, and those acting on behalf of such agencies, are exempt from the processing fee – ***attach documentation of fee exempt status as outlined in instructions.*** (50 CFR 13.11(d))

2. Do you currently have or have you ever had any Federal Fish and Wildlife permits?
Yes ☐ If yes, list the number of the most current permit you have held or that you are applying to renew/re-issue:_____ No ☑

3. Certification: I hereby certify that I have read and am familiar with the regulations contained in ***Title 50, Part 13 of the Code of Federal Regulations*** and the other ***applicable parts in subchapter B of Chapter I of Title 50***, and I certify that the information submitted in this application for a permit is complete and accurate to the best of my knowledge and belief. I understand that any false statement herein may subject me to the criminal penalties of 18 U.S.C. 1001.

Signature of applicant/person responsible for permit (No photocopied or stamped signatures) — Date of signature (mm/dd/yyyy): 1/12/18

Please continue to next page

E. IMPORT OF SPORT-HUNTED TROPHIES OF SOUTHERN AFRICAN LEOPARD, AFRICAN ELEPHANT, AND NAMIBIAN SOUTHERN WHITE RHINOCEROS

Note 1: If you hold an import permit for a trophy/trophies that you did not use, please **return the unused original permit**. If you are requesting reissuance of a permit because you have taken a trophy, but were unable to import it prior to the expiration of the permit, please use the renewal form (3-200-52; http://www.fws.gov/international/permits/by-form-number/index.html) and return your original permit with that form.

Note 2: *Sport-hunted trophy* is defined at 50 CFR 23.74 as follows: *Sport-hunted trophy* means a whole dead animal or a readily recognizable part or derivative of an animal specifically identified on the accompanying CITES document that meets the following criteria:

(1) Is raw, processed, or manufactured;
(2) Was legally obtained by the hunter through hunting for his or her personal use;
(3) Is being imported, exported, or re-exported by or on behalf of the hunter as part of the transfer from its country of origin ultimately to the hunter's country of usual residence; and
(4) Includes worked, manufactured, or handicraft items made from the sport-hunted animal only when:
  (i) Such items are contained in the same shipment as raw or tanned parts of the sport-hunted animal and are for the personal use of the hunter;
  (ii) The quantity of such items is no more than could reasonably be expected given the number of animals taken by the hunter as shown on the license or other documentation of the authorized hunt accompanying the shipment; and
  (iii) The accompanying CITES documents (export document and, if appropriate, import permit) contain a complete itemization and description of all items included in the shipment.

Note 3: Certain hunting trophies, including leopard, elephant, and rhinoceros hunting trophies, are subject to restrictions on their use after import into the United States. Please see 50 CFR 23.55 for more information or contact the Division of Management Authority.

Please provide the following information. Complete all questions on the application. Mark questions that are not applicable with "N/A". If applying for more than one trophy, be sure to answer questions 2 and 3 for each trophy.

If importing trophies from more than one country, you must submit a separate application for each shipment in order to obtain separate import permits.

1. ENTER the quantity next to the name of the species you are applying to import (you may apply to import specimens of more than one species provided they have been/are being hunted in the same country):

Leopard (*Panthera pardus*) Quantity: n/a (Import is limited to two per hunter per calendar year)

African elephant (*Loxodonta africana*) Quantity: 1 (Import is limited to two per hunter per calendar year)
Note: once imported, ivory cannot be re-exported.

Southern white rhinoceros (*Ceratotherium simum simum*) from Namibia Quantity: n/a (An import permit is not required for trophies harvested in South Africa or Swaziland. If you wish to import from a different country, please use form 3-200-37).

2. **IF ANIMAL IS CURRENTLY LIVING IN THE WILD**, please enter the following:
   a. Country and place (area, region, GIS coordinates, ranch AND nearest city) where wildlife is to be taken from the wild:
   n/a

   b. Date wildlife is to be hunted:
   n/a

c. Description of the trophy and parts you intend to import (e.g., skin, skull, shoulder mount, life size mount, claws, horns, tusks).

n/a

3. **IF THE ANIMAL IS DEAD**, please enter the following:
   a. Country and place (area, region, GIS coordinates, ranch, and/or AND nearest city) where trophy was removed from the wild:
   b. Date wildlife was hunted: 10/13/2017 - Concession - N#a Jagna Conservancy, Closest town is Tsumkwe. Namibia, Bushmanland Region, GPS coordinates - S 19 11 47.6 / E 020 04 17.0
   c. Description of the trophy and parts you intend to import (e.g., skin, skull, shoulder mount, life size mount, claws, horn, tusks):

      skin, claws, horn, tusks

   d. The current location of the trophy (address and country) [the U.S. import permit will identify this country as the country of export/re-export and must match with the export/re-export document]:

      Caspers Taxidermy, Industrial Area, Grootfontein, Namibia / P.O. Box 1322 Grootfontein, Namibia

4. Complete name and address of overseas person or business shipping the trophy to you. If you are applying to import a trophy directly from Namibia, you **must** provide the name and address of the professional hunter listed on your Namibian hunting permit [this name will appear on the face of the export permit].

Name: Business Name:	Caspers Taxidermy
Address:	Industrial Area (P.O. Box 1322, Grootfontein, Namibia)
City:	Grootfontein
State/Province:	Namibia
Country, Postal Code:	(Professional Hunter - Anton Mynhardt Alberts, 92 Nelson Mandela Avenue, Stillwater #5 Klein Windhoek, City of Windhoek, Namibia)

5. Please be aware that the U.S. Fish and Wildlife Service may need to make a finding that your activities will enhance or benefit wild populations of the species involved. If you have any information that could support this finding (e.g., how the funds from license/trophy fees will be spent, what portion of the hunting fee will support conservation), please submit such information on a separate page with your application.

CERTIFICATION STATEMENT (original signature must be provided for either 6 or 7 below)

6. **If you are a broker or taxidermist applying on behalf of a foreign national,** provide documentation to show you have a **Power of Attorney** to act on your client's behalf and sign the following statement.

   I acknowledge that the sport-hunted trophy/trophies to be imported has been/will be personally hunted by my client and is being imported only for my client's personal use (i.e., **not for sale, transfer, donation, or exchange that is reasonably likely to result in economic use, gain, or benefit**). I understand that my client may only import two leopard trophies in one calendar year. I understand that my client may only import two African elephant trophies in one calendar year. In addition, I have advised my client that raw ivory, once imported into the United States, cannot be re-exported.

   Taxidermist/Broker's signature:_____ Date: _____

7. **If you are the hunter applying to import your own trophy**, please read and sign the following statement.

I acknowledge that the sport-hunted trophy/trophies to be imported has been/will be personally hunted by me and is being imported only for my personal use (i.e., **not for sale, transfer, donation, or exchange that is reasonably likely to result in economic use, gain, or benefit**). I understand that I may only import two leopard trophies in one calendar year. I understand that I may only import two African elephant trophies in one calendar year. In addition, I understand that raw ivory, once imported into the United States, cannot be re-exported.

Applicant's signature: _____ Date: 1/12/18

Be aware that there may be additional permitting or approval requirements by your local or state governments, as well as required by other Federal agencies or foreign government to conduct your propose activity. While the Service will attempt to assist where possible, it is your responsibility to obtain such approval.

8. All international shipment(s) must be through a designated port. A list of designated ports (where an inspector is posted) is available from http://www.fws.gov/le/designated-ports.html. If you wish to use a port not listed, please contact the Office of Law Enforcement for a Designated Port Exemption Permit (form 3-200-2).

San Francisco

9. Name and address where you wish the permit to be mailed, if different from page 1 (All permits will be mailed via the U.S. Postal Service, unless you identify an alternative means below):

10. If you wish the permit to be delivered by means other than USPS regular mail, provide an air bill, pre-paid envelope, or billing information. If you do not have a pre-paid envelope or air bill and wish to pay for a courier service with your credit card, please check the box below. Please DO NOT include credit card number or other information; you will be contacted for this information.

☑ If a permit is issued, please send it via a courier service to the address on page 1 or question 9. I understand that you will contact me for my credit card information once the application has been processed.

11. Who should we contact if we have questions about the application? (Include name, phone number, and email):

Jessica Moraes (b) (6) [redacted]

12. **Disqualification Factor.** A conviction, or entry of a plea of guilty or nolo contendere, for a felony violation of the Lacey Act, the Migratory Bird Treaty Act, or the Bald and Golden Eagle Protection Act disqualifies any such person from receiving or exercising the privileges of a permit, unless such disqualification has been expressly waived by the Service Director in response to a written petition. (50 CFR 13.21(c)) Have you or any of the owners of the business, if applying as a business, been convicted, or entered a plea of guilty or nolo contendere, forfeited collateral, or are currently under charges for any violations of the laws mentioned above?

☐ Yes ☑ No If you answered "Yes" provide: a) the individual's name, b) date of charge, c) charge(s), d) location of incident, e) court, and f) action taken for each violation.

RCVD JAN 24 2018

ORIGINAL DOCUMENT PRINTED ON CHEMICAL REACTIVE PAPER WITH MICROPRINTED BORDER

(b) (6)

CALIFORNIA BANK & TRUST
1277 Treat Blvd., Suite 120
Walnut Creek, CA 94597

11-204/1210

(b) (6)

01/17/2018

PAY TO THE ORDER OF US Fish & Wildlife Service

**********$100.00

$

EXACTLY ONE HUNDRED DOLLARS

DOLLARS

US Fish & Wildlife Service

MEMO Memo: Permit Application fee

THIS DOCUMENT CONTAINS HEAT SENSITIVE INK. TOUCH OR PRESS HERE - RED IMAGE DISAPPEARS WITH HEAT

(b) (6)

Department of the Interior
U.S. Fish and Wildlife Service

OMB No. 1018-0164
Expires 11/30/2016

Federal Fish and Wildlife Permit Application Form

Return to: U.S. Fish and Wildlife Service
Division of Management Authority (DMA)
Branch of Permits, MS: IA
5275 Leesburg Pike
Falls Church, VA 22041-3803
1-800-358-2104 or 703-358-2104

Type of Activity:
Import of Sport-hunted Trophies of Southern African Leopard, African Elephant, and Namibian Southern White Rhinoceros

Complete Sections A or B, and C, D, and E of this application. U.S. address may be required in Section C, see instructions for details.
See attached instruction pages for information on how to make your application complete and help avoid unnecessary delays.

A. Complete if applying as an individual

1.a. Last name	1.b. First name	1.c. Middle name or initial	1.d. Suffix
Johnson	David	(b) (6)	

2. Date of birth (mm/dd/yyyy)	3. Occupation	4. Affiliation/ Doing business as (see instructions)
(b) (6)		

5.a. Telephone number	5.b. Alternate telephone number	5.c. Fax number	5.d. E-mail address
(b) (6)			

B. Complete if applying on behalf of a business, corporation, public agency, Tribe, or institution

1.a. Name of business, agency, Tribe, or institution	1.b. Doing business as (dba)

2. Tax identification no.	3. Description of business, agency, Tribe, or institution

4.a. Principal officer Last name	4.b. Principal officer First name	4.c. Principal officer Middle name/ initial	4.d. Suffix

5. Principal officer title	6. Primary contact name

7.a. Business telephone number	7.b. Alternate telephone number	7.c. Business fax number	7.d. Business e-mail address

C. All applicants complete address information

1.a. Physical address (Street address; Apartment #, Suite #, or Room #; no P.O. Boxes)
(b) (6)

1.b. City	1.c. State	1.d. Zip code/Postal code:	1.e. County/Province	1.f. Country
Spicewood	Texas	(b) (6)		USA

2.a. Mailing Address (include if different than physical address; include name of contact person if applicable)

2.b. City	2.c. State	2.d. Zip code/Postal code:	2.e. County/Province	2.f. Country

D. All applicants MUST complete

1. Attach check or money order payable to the U.S. FISH AND WILDLIFE SERVICE **in the amount of $100, nonrefundable processing fee**. Federal, Tribal, State, and local government agencies, and those acting on behalf of such agencies, are exempt from the processing fee – ***attach documentation of fee exempt status as outlined in instructions.*** (50 CFR 13.11(d))

2. Do you currently have or have you ever had any Federal Fish and Wildlife permits?
Yes ☐ If yes, list the number of the most current permit you have held or that you are applying to renew/re-issue:_____ No ☑

3. Certification: I hereby certify that I have read and am familiar with the regulations contained in ***Title 50, Part 13 of the Code of Federal Regulations*** and the other ***applicable parts in subchapter B of Chapter I of Title 50***, and I certify that the information submitted in this application for a permit is complete and accurate to the best of my knowledge and belief. I understand that any false statement herein may subject me to the criminal penalties of 18 U.S.C. 1001.

Signature of applicant/person responsible for permit (No photocopied or stamped signatures) — Date of signature (mm/dd/yyyy): 01-19-2018

Please continue to next page

E. IMPORT OF SPORT-HUNTED TROPHIES OF SOUTHERN AFRICAN LEOPARD, AFRICAN ELEPHANT, AND NAMIBIAN SOUTHERN WHITE RHINOCEROS

Note 1: If you hold an import permit for a trophy/trophies that you did not use, please **return the unused original permit**. If you are requesting reissuance of a permit because you have taken a trophy, but were unable to import it prior to the expiration of the permit, please use the renewal form (3-200-52; http://www.fws.gov/international/permits/by-form-number/index.html) and return your original permit with that form.

Note 2: *Sport-hunted trophy* is defined at 50 CFR 23.74 as follows: *Sport-hunted trophy* means a whole dead animal or a readily recognizable part or derivative of an animal specifically identified on the accompanying CITES document that meets the following criteria:

(1) Is raw, processed, or manufactured;
(2) Was legally obtained by the hunter through hunting for his or her personal use;
(3) Is being imported, exported, or re-exported by or on behalf of the hunter as part of the transfer from its country of origin ultimately to the hunter's country of usual residence; and
(4) Includes worked, manufactured, or handicraft items made from the sport-hunted animal only when:
  (i) Such items are contained in the same shipment as raw or tanned parts of the sport-hunted animal and are for the personal use of the hunter;
  (ii) The quantity of such items is no more than could reasonably be expected given the number of animals taken by the hunter as shown on the license or other documentation of the authorized hunt accompanying the shipment; and
  (iii) The accompanying CITES documents (export document and, if appropriate, import permit) contain a complete itemization and description of all items included in the shipment.

Note 3: Certain hunting trophies, including leopard, elephant, and rhinoceros hunting trophies, are subject to restrictions on their use after import into the United States. Please see 50 CFR 23.55 for more information or contact the Division of Management Authority.

Please provide the following information. Complete all questions on the application. Mark questions that are not applicable with "N/A". If applying for more than one trophy, be sure to answer questions 2 and 3 for each trophy.

If importing trophies from more than one country, you must submit a separate application for each shipment in order to obtain separate import permits.

1. ENTER the quantity next to the name of the species you are applying to import (you may apply to import specimens of more than one species provided they have been/are being hunted in the same country):

Leopard (*Panthera pardus*) Quantity: NA (Import is limited to two per hunter per calendar year)

African elephant (*Loxodonta africana*) Quantity: 1 (Import is limited to two per hunter per calendar year)
Note: once imported, ivory cannot be re-exported.

Southern white rhinoceros (*Ceratotherium simum simum*) from Namibia Quantity: NA (An import permit is not required for trophies harvested in South Africa or Swaziland. If you wish to import from a different country, please use form 3-200-37).

2. **IF ANIMAL IS CURRENTLY LIVING IN THE WILD**, please enter the following:
   a. Country and place (area, region, GIS coordinates, ranch AND nearest city) where wildlife is to be taken from the wild: NA

   b. Date wildlife is to be hunted: NA

c. Description of the trophy and parts you intend to import (e.g., skin, skull, shoulder mount, life size mount, claws, horns, tusks). NA

3. **IF THE ANIMAL IS DEAD**, please enter the following:
   a. Country and place (area, region, GIS coordinates, ranch, and/or AND nearest city) where trophy was removed from the wild: Namibia, Otimbojo/Uhungu, Africa
   b. Date wildlife was hunted: September 19, 2017
   c. Description of the trophy and parts you intend to import (e.g., skin, skull, shoulder mount, life size mount, claws, horn, tusks): 4 Elephant feet mounted as bar stools, tanned skin panels as leather, tanned face panel, tanned trunk, 2 tanned ears, tail as a flyswatter, 2 tusks
   d. The current location of the trophy (address and country) [the U.S. import permit will identify this country as the country of export/re-export and must match with the export/re-export document]:
   Reisec Taxidermy
   Plot 43, Brakwater, Windhoek, ~~Namibia~~ Africa Namibia 9000

4. Complete name and address of overseas person or business shipping the trophy to you. If you are applying to import a trophy directly from Namibia, you **must** provide the name and address of the professional hunter listed on your Namibian hunting permit [this name will appear on the face of the export permit].

   Name: Business: Reisec Taxidermy
   Name: Address: Sven Baard
   Address: Plot 43, Brakwater
   City: Windhoek
   State/Province:
   Country, Postal Code: Namibia 9000

5. Please be aware that the U.S. Fish and Wildlife Service may need to make a finding that your activities will enhance or benefit wild populations of the species involved. If you have any information that could support this finding (e.g., how the funds from license/trophy fees will be spent, what portion of the hunting fee will support conservation), please submit such information on a separate page with your application.

CERTIFICATION STATEMENT (original signature must be provided for either 6 or 7 below)

6. **If you are a broker or taxidermist applying on behalf of a foreign national,** provide documentation to show you have a **Power of Attorney** to act on your client's behalf and sign the following statement.

   I acknowledge that the sport-hunted trophy/trophies to be imported has been/will be personally hunted by my client and is being imported only for my client's personal use (i.e., **not for sale, transfer, donation, or exchange that is reasonably likely to result in economic use, gain, or benefit**). I understand that my client may only import two leopard trophies in one calendar year. I understand that my client may only import two African elephant trophies in one calendar year. In addition, I have advised my client that raw ivory, once imported into the United States, cannot be re-exported.

   Taxidermist/Broker's signature:_____ Date: _____

7. **If you are the hunter applying to import your own trophy**, please read and sign the following statement.

I acknowledge that the sport-hunted trophy/trophies to be imported has been/will be personally hunted by me and is being imported only for my personal use (i.e., **not for sale, transfer, donation, or exchange that is reasonably likely to result in economic use, gain, or benefit**). I understand that I may only import two leopard trophies in one calendar year. I understand that I may only import two African elephant trophies in one calendar year. In addition, I understand that raw ivory, once imported into the United States, cannot be re-exported.

Applicant's signature: _____ Date: 01-18-2018

Be aware that there may be additional permitting or approval requirements by your local or state governments, as well as required by other Federal agencies or foreign government to conduct your propose activity. While the Service will attempt to assist where possible, it is your responsibility to obtain such approval.

8. All international shipment(s) must be through a designated port. A list of designated ports (where an inspector is posted) is available from http://www.fws.gov/le/designated-ports.html. If you wish to use a port not listed, please contact the Office of Law Enforcement for a Designated Port Exemption Permit (form 3-200-2).

9. Name and address where you wish the permit to be mailed, **if** different from page 1 (All permits will be mailed via the U.S. Postal Service, unless you identify an alternative means below):

10. If you wish the permit to be delivered by means other than USPS regular mail, provide an air bill, pre-paid envelope, or billing information. If you do not have a pre-paid envelope or air bill and wish to pay for a courier service with your credit card, please check the box below. Please DO NOT include credit card number or other information; you will be contacted for this information.

☐ If a permit is issued, please send it via a courier service to the address on page 1 or question 9. I understand that you will contact me for my credit card information once the application has been processed.

11. Who should we contact if we have questions about the application? (Include name, phone number, and email):

12. **Disqualification Factor**. A conviction, or entry of a plea of guilty or nolo contendere, for a felony violation of the Lacey Act, the Migratory Bird Treaty Act, or the Bald and Golden Eagle Protection Act disqualifies any such person from receiving or exercising the privileges of a permit, unless such disqualification has been expressly waived by the Service Director in response to a written petition. (50 CFR 13.21(c)) Have you or any of the owners of the business, if applying as a business, been convicted, or entered a plea of guilty or nolo contendere, forfeited collateral, or are currently under charges for any violations of the laws mentioned above?

☐ Yes ☑ No If you answered "Yes" provide: a) the individual's name, b) date of charge, c) charge(s), d) location of incident, e) court, and f) action taken for each violation.

David (b) (6) Johnson
(b) (6)
Spicewood, Texas (b) (6)
(b) (6)

RE: Namibia Africa Elephant Hunt September 19, 2017

Nick Nolte Hunting was contacted by the Namibia Ministry Of Environment and Tourism on or about September 17, 2017 to help in the removal of a problem/rogue bull elephant in the Otjimbojo/Uhungu (see attached Permit To Hunt For Trophies) area of Namibia, Africa. The Namibia Ministry Of Environment and Tourism stated that the Elephant was responsible for the deaths of two people and destroying approximately 20 huts in a village. The Namibia Ministry Of Environment and Tourism was seeking a hunter to pay to hunt the Elephant and the funds they were seeking would go to help the victims and their family's. The Namibia Ministry Of Environment and Tourism stated that if no paying hunter could be found the Elephant would be killed within 2-3 days time. The meat from the Elephant would go to the people of the village once it was dead.

Thank you.

David Johnson

1-23-2017

MINISTRY OF ENVIRONMENT AND TOURISM

Directorate Scientific Services
Private Bag 13306
Windhoek, Namibia
Enquiries: Chief Warden
Permit Office

Tel +264-61-284 2111
Fax +264-61-258 861

PERMIT No.:	174849
VALID FROM:	19/09/2017
VALID TO:	30/09/2017

PERMIT TO HUNT FOR TROPHIES

Permission is hereby granted in terms of the Nature Conservation Ordinance 1975 (Ord. 4 of 1975)

Name of Trophy Hunter: David (b) (6) Johnson

Residential Address:

Country: U.S.A

to hunt the specified number of game for the sake of trophies:

CITES Indicates species listed on CITES Appendix I or II

	SPECIES: COMMON NAME	Number
	Buffalo	
CITES I	Crocodile	
	Dik-dik	
	Eland	
* CITES II	Elephant	X
	Giraffe	
	Grey Duiker	
CITES II	Hippopotamus	
	Impala, Black-faced	
	Impala, common	
	Klipspringer	
	Kudu	
CITES II	Lechwe	
	Oryx (Gemsbok)	
	Ostrich	
	Red hartebeest	
	Reedbuck	
CITES I	Rhinoceros, black	
CITES I	Rhinoceros, white	
	Roan	
	Sable	
	Springbok	

	SPECIES: COMMON NAME	Number
	Steenbok	
	Warthog	
	Waterbuck	
	Wildebeest, blue	
	Zebra, Burchell s	
CITES II	Zebra, Hartman's mountain	
	Blesbok	
	Wildebeest, black	
CITES I	Cheetah	
CITES I	Leopard	
CITES II	Lion	
	Other	
*	MET to identify the animal.	
*	MET to be present during hunt	
*	Not more than 5 in group	

on the following farms / hunting concessions: Otjimboja / Uhungu

Guided by (name of guides): Nick Nolte

Cashier receipt No.: 21603591

Issued on: 15/09/2017

Amount received: N$

MINISTRY OF ENVIRONMENT & TOURISM
Elvis Murorel E-Murorel
ISSUING OFFICER (NAME & SIGNATURE)
UNDER THE AUTHORITY OF THE MINISTER, POHAMBA SHIPENGA PERMANENT SECRETARY IN TERMS OF SECTION 31(2)(b) OF THE NATURE CONSERVATION ORDINANCE, 1975 (ORDINANCE NO. 4 OF 1975) AS AMENDED.

Official MET date stamp

IMPORTANT: This permit is not valid if altered in any way.

The following certificate must be completed immediately after each animal that has been hunted (please print)

Date	Species	LH*	RH*	LB*	RB*	Total	RW*	Age	Male Female	Farm		Farm owner	Hunter	Professional hunter Master hunting guide Hunting guide
										Name	No			
21/9/17	ELEPHANT							6	MALE	OTJIMBOYO CONS.				

*L=Left, R=Right, H=Horn, B=Base, RW=Rowland Ward

No trophy hunter may hunt unless accompanied by a professional hunter,, master hunting guide or hunting guide.

This permit must be kept on the person of the permit-holder at all times while hunting.

Only guide(s) as specified on the permit ma conduct the hunt

RCVD JAN 30 2018

COMERICA BANK
www.comerica.com

(b) (6)

DAVID (b) JOHNSON
(b) (6)
SPICEWOOD, TX (b) (6)

1-23-18

PAY TO THE ORDER OF U. S. Fish And Wildlife Service $ 100 00/100

One Hundred & no/100 DOLLAI

MEMO Elephant Import Processing Fee
(b) (6)

AUTHORIZED SIGNATURE

Department of the Interior
U.S. Fish and Wildlife Service

OMB No. 1018-0093
Expires 05/31/2017

Federal Fish and Wildlife Permit Application Form

FEB 7 2018

Return to: U.S. Fish and Wildlife Service
Division of Management Authority (DMA)
Branch of Permits, MS: IA
5275 Leesburg Pike
Falls Church, VA 22041-3803
1-800-358-2104 or 703-358-2104

Type of Activity:
Import of Sport-hunted Trophies of Southern African Leopard, African Elephant, and Namibian Southern White Rhinoceros

Complete Sections A or B, and C, D, and E of this application. U.S. address may be required in Section C, see instructions for details.
See attached instruction pages for information on how to make your application complete and help avoid unnecessary delays.

A. Complete if applying as an individual

1.a. Last name	1.b. First name	1.c. Middle name or initial	1.d. Suffix
DE NATALE	Ralph	(b) (6)	

2. Date of birth (mm/dd/yyyy)	3. Social Security No.	4. Occupation	5. Affiliation/ Doing business as (see instructions)
(b) (6)			

6.a. Telephone number	6.b. Alternate telephone number	6.c. Fax number	6.d. E-mail address
(b) (6)			

B. Complete if applying on behalf of a business, corporation, public agency, Tribe, or institution

1.a. Name of business, agency, Tribe, or institution	1.b. Doing business as (dba)

2. Tax identification no.	3. Description of business, agency, Tribe, or institution

4.a. Principal officer Last name	4.b. Principal officer First name	4.c. Principal officer Middle name/ initial	4.d. Suffix

5. Principal officer title	6. Primary contact name

7.a. Business telephone number	7.b. Alternate telephone number	7.c. Business fax number	7.d. Business e-mail address

C. All applicants complete address information

1.a. Physical address (Street address; Apartment #, Suite #, or Room #; no P.O. Boxes)
(b) (6)

1.b. City	1.c. State	1.d. Zip code/Postal code:	1.e. County/Province	1.f. Country
Woodbridge	CT	(b) (6)		USA

2.a. Mailing Address (include if different than physical address; include name of contact person if applicable)

2.b. City	2.c. State	2.d. Zip code/Postal code:	2.e. County/Province	2.f. Country

D. All applicants MUST complete

1. Attach check or money order payable to the U.S. FISH AND WILDLIFE SERVICE **in the amount of $100, nonrefundable processing fee.** Federal, Tribal, State, and local government agencies, and those acting on behalf of such agencies, are exempt from the processing fee – ***attach documentation of fee exempt status as outlined in instructions.*** (50 CFR 13.11(d))

2. Do you currently have or have you ever had any Federal Fish and Wildlife permits?
Yes ☐ If yes, list the number of the most current permit you have held or that you are applying to renew/re-issue: _____ No ☒

3. Certification: I hereby certify that I have read and am familiar with the regulations contained in ***Title 50, Part 13 of the Code of Federal Regulations*** and the other ***applicable parts in subchapter B of Chapter I of Title 50***, and I certify that the information submitted in this application for a permit is complete and accurate to the best of my knowledge and belief. I understand that any false statement herein may subject me to the criminal penalties of 18 U.S.C. 1001.

(b) (6) Ralph De Natale — 01/28/2018

Signature (**in blue ink**) of applicant/person responsible for permit (No photocopied or stamped signatures) — Date of signature (mm/dd/yyyy)

Please continue to next page

E. IMPORT OF SPORT-HUNTED TROPHIES OF SOUTHERN AFRICAN LEOPARD, AFRICAN ELEPHANT, AND SOUTHERN WHITE RHINOCEROS

Below is the details of Save Valley etc
Address is P.O. Box CH381 Chispite Harare
Area hunted Save Valley Conservancy
Area:Nyika Region: Masvingo
Ranch Matendere and Mapari
Nearest City Masvingo
Co ordinates 20.516985 32.096167

ies that you did not use, please **return the unused original**
ecause you have taken a trophy, but were unable to import it
ewal form (3-200-52;
nber/index.html) and return your original permit with that

Note 2: The U.S. FWS has determined that a trophy consists of raw or tanned parts of a specimen taken by a hunter during a sport hunt for personal use. It may include the bones, claws, hair, head, hide, hooves, horns, meat, skull, teeth, tusks, or any taxidermied part, including, but not limited to, a rug or taxidermied head, shoulder, or full mount. It does not include articles made from a trophy, such as worked, manufactured, or handicraft items for use as clothing, curios, ornamentation, jewelry, or other utilitarian items. If you wish to import such products, please contact the Division of Management Authority for the proper application form.

Note 3: Certain hunting trophies, including leopard, elephant, and rhinoceros hunting trophies, are subject to restrictions on their use after import into the United States. Please see 50 CFR 23.55 for more information or contact the Division of Management Authority.

Please provide the following information. Complete all questions on the application. Mark questions that are not applicable with "N/A". If applying for more than one trophy, be sure to answer questions 2 and 3 for each trophy. If importing trophies from more than one country, you must submit a separate application for each shipment in order to obtain separate import permits.

1. ENTER the quantity next to the name of the species you are applying to import (you may apply to import specimens of more than one species provided they have been/are being hunted in the same country):

Leopard (*Panthera pardus*) Quantity: _____ (Limited to the import of two per calendar year)

African elephant (*Loxodonta africana*) Quantity: 1 (Import permit is not required for trophies harvested in Botswana, Namibia, South Africa, or Zimbabwe). **Note: once imported, ivory cannot be re-exported.**

Southern white rhinoceros (*Ceratotherium simum simum*) from Namibia Quantity: _____ (An import permit is not required for trophies harvested in South Africa or Swaziland. If you are looking to import from a different country, please use form 3-200-37).

2. **IF ANIMAL IS CURRENTLY LIVING IN THE WILD,** please enter the following:
   a. Country and place (area, region, GIS coordinates, ranch AND nearest city) where wildlife is to be taken from the wild: SAVE VALLEY CONSERVANCY, P.O. BOX CH381 CHISPITE HARARE, ZIMBABWE AREA: NYIKA REGION: MASVINGO RANCH: MATENDERE AND MAPARI NEAREST CITY: MASVINGO, COORDINATES 20.516985 & 32.096167
   b. Date wildlife is to be hunted: 06/25/2018 – 07/14/2018
   c. Description of the trophy and parts you intend to import (e.g., skin, skull, shoulder mount, life size mount, claws, horns, tusks).
      SKIN, SKULL, TUSKS, FEET
3. **IF THE ANIMAL IS DEAD,** please enter the following:
   a. Country and place (area, region, GIS coordinates, ranch, and/or AND nearest city) where trophy was removed from the wild:
   b. Date wildlife was hunted:

c. Description of the trophy and parts you intend to import (e.g., skin, skull, shoulder mount, life size mount, claws, horn, tusks):

d. The current location of the trophy (address and country) [the U.S. import permit will identify this country as the country of export/re-export and must match with the export/re-export document]:

4. Complete name and address of overseas person or business shipping the trophy to you. If you are applying to import a trophy directly from Namibia, you **must** provide the name and address of the professional hunter listed on your Namibian hunting permit [this name will appear on the face of the export permit].

Name: GAVIN ROURKE PROFESSIONAL HUNTER LICENSE 318
Business Name: SAFARI SERVICES AFRICA LLC
Address: 6 MILLAR ROAD,
Address:
City: BORROWDALE HARARE
State/Province:
Country, Postal Code: ZIMBABWE

5. Please be aware that the U.S. Fish and Wildlife Service may need to make a finding that your activities will enhance or benefit wild populations of the species involved. If you have any information that could support this finding (e.g., how the funds from license/trophy fees will be spent, what portion of the hunting fee will support conservation), please submit such information on a separate page with your application.

CERTIFICATION STATEMENT (original signature must be provided for either 6 or 7 below)

6. **If you are a broker or taxidermist applying on behalf of a foreign national,** provide documentation to show you have a **Power of Attorney** to act on your client's behalf and sign the following statement.

I acknowledge that the sport-hunted trophy/trophies to be imported has been/will be personally hunted by my client and is being imported only for my client's personal use (i.e., **not for sale, transfer, donation, or exchange that is reasonably likely to result in economic use, gain, or benefit**). I understand that my client may only import two leopard trophies in one calendar year (if applicable). In addition, I have advised my client that raw ivory, once imported into the United States, cannot be re-exported.

Taxidermist/Broker's signature: _____ Date: _____

7. **If you are the hunter applying to import your own trophy**, please read and sign the following statement.

I acknowledge that the sport-hunted trophy/trophies to be imported has been/will be personally hunted by me and is being imported only for my personal use (i.e., **not for sale, transfer, donation, or exchange that is reasonably likely to result in economic use, gain, or benefit**). I understand that I may only import two leopard trophies in one calendar year (if applicable). In addition, I understand that raw ivory, once imported into the United States, cannot be re-exported.

Applicant's signature: Adolph (b)(6) De Natale Date: 01/28/2018

Be aware that there may be additional permitting or approval requirements by your local or state governments, as well as required by other Federal agencies or foreign government to conduct your propose activity. While the Service will attempt to assist where possible, it is your responsibility to obtain such approval.

8. All international shipment(s) must be through a designated port. A list of designated ports (where an inspector is posted) is available from http://www.fws.gov/le/designated-ports.html. If you wish to use a port not listed, please contact the Office of Law Enforcement for a Designated Port Exemption Permit (form 3-200-2).

NEW York, NEW York

9. Name and address where you wish the permit to be mailed, if different from page 1 (All permits will be mailed via the U.S. Postal Service, unless you identify an alternative means below):

10. If you wish the permit to be delivered by means other than USPS regular mail, provide an air bill, pre-paid envelope, or billing information. If you do not have a pre-paid envelope or air bill and wish to pay for a courier service with your credit card, please check the box below. Please DO NOT include credit card number or other information; you will be contacted for this information.

☐ If a permit is issued, please send it via a courier service to the address on page 1 or question 9. I understand that you will contact me for my credit card information once the application has been processed.

11. Who should we contact if we have questions about the application? (Include name, phone number, and email):

Ralph (b) (6) DE NATALE (b) (6) [redacted]

email: (b) (6) [redacted]

12. **Disqualification Factor.** A conviction, or entry of a plea of guilty or nolo contendere, for a felony violation of the Lacey Act, the Migratory Bird Treaty Act, or the Bald and Golden Eagle Protection Act disqualifies any such person from receiving or exercising the privileges of a permit, unless such disqualification has been expressly waived by the Service Director in response to a written petition. (50 CFR 13.21(c)) Have you or any of the owners of the business, if applying as a business, been convicted, or entered a plea of guilty or nolo contendere, forfeited collateral, or are currently under charges for any violations of the laws mentioned above?

☐ Yes ☒ No If you answered "Yes" provide: a) the individual's name, b) date of charge, c) charge(s), d) location of incident, e) court, and f) action taken for each violation.

Checks Unlimited 1-800-210-0468 www.checksunlimited.com

RALPH (b) DENATALE

(b) (6)

WOODBRIDGE, CT (b) (6)

51-57/119

(b) (6)

DATE 1/28/18

PAY to the order of US fish and Wildlife Service $ 100 00/XX

one hundred 00 DOLLARS

BANK OF AMERICA
ACH R/T 011900571

FOR Permit

Ralph DeNatale

(b) (6)

RCVD FEB 12 2018

OMB No. 1018-0093
Expires 05/31/2017

Department of the Interior
U.S. Fish and Wildlife Service

Federal Fish and Wildlife Permit Application Form

Return to: U.S. Fish and Wildlife Service
Division of Management Authority (DMA)
Branch of Permits, MS: IA
5275 Leesburg Pike
Falls Church, VA 22041-3803
1-800-358-2104 or 703-358-2104

Type of Activity:
IMPORT OF SPORT-HUNTED TROPHIES
(Appendix I of CITES and/or ESA)

Complete Sections A or B, and C, D, and E of this application. U.S. address may be required in Section C, see instructions for details.
See attached instruction pages for information on how to make your application complete and help avoid unnecessary delays.

A. Complete if applying as an individual

1.a. Last name	1.b. First name	1.c. Middle name or initial	1.d. Suffix
Hadden	David	(b) (6)	

2. Date of birth (mm/dd/yyyy)	3. Social Security No.	4. Occupation	5. Affiliation/ Doing business as (see instructions)
(b) (6)			

6.a. Telephone number	6.b. Alternate telephone number	6.c. Fax number	6.d. E-mail address
(b) (6)			(b) (6)

B. Complete if applying on behalf of a business, corporation, public agency, Tribe, or institution

1.a. Name of business, agency, Tribe, or institution	1.b. Doing business as (dba)

2. Tax identification no.	3. Description of business, agency, Tribe, or institution

4.a. Principal officer Last name	4.b. Principal officer First name	4.c. Principal officer Middle name/ initial	4.d. Suffix

5. Principal officer title	6. Primary contact name

7.a. Business telephone number	7.b. Alternate telephone number	7.c. Business fax number	7.d. Business e-mail address

C. All applicants complete address information

1.a. Physical address (Street address; Apartment #, Suite #, or Room #; no P.O. Boxes)				
(b) (6)				
1.b. City	**1.c. State**	**1.d. Zip code/Postal code:**	**1.e. County/Province**	**1.f. Country**
Corpus Christi	TX	(b) (6)		United States

2.a. Mailing Address (include if different than physical address; include name of contact person if applicable)				
2.b. City	**2.c. State**	**2.d. Zip code/Postal code:**	**2.e. County/Province**	**2.f. Country**

D. All applicants MUST complete

1. Attach check or money order payable to the U.S. FISH AND WILDLIFE SERVICE **in the amount of $100, nonrefundable processing fee**. Federal, Tribal, State, and local government agencies, and those acting on behalf of such agencies, are exempt from the processing fee – ***attach documentation of fee exempt status as outlined in instructions.*** (50 CFR 13.11(d))

2. Do you currently have or have you ever had any Federal Fish and Wildlife permits?
Yes ☐ If yes, list the number of the most current permit you have held or that you are applying to renew/re-issue: _____ No ☑

3. Certification: I hereby certify that I have read and am familiar with the regulations contained in ***Title 50, Part 13 of the Code of Federal Regulations*** and the other ***applicable parts in subchapter B of Chapter I of Title 50***, and I certify that the information submitted in this application for a permit is complete and accurate to the best of my knowledge and belief. I understand that any false statement herein may subject me to the criminal penalties of 18 U.S.C. 1001.

David Hadden — 1-19-2018

Signature (**in blue ink**) of applicant/person responsible for permit (No photocopied or stamped signatures) — Date of signature (mm/dd/yyyy)

Please continue to next page

E. IMPORT OF SPORT-HUNTED TROPHIES *(Appendix I of CITES* and/or *ESA)*

Note 1: If you hold an import permit for trophy/trophies that you did not use, please **return the unused original permit**. If you are requesting reissuance of a permit because you have taken a trophy, but are unable to import it prior to the expiration of the permit, please use the renewal form (3-200-52; http://www.fws.gov/international/permits/by-form-number/index.html) and return your original permit with that form.

Note 2: Applications for species listed as endangered under the U.S. Endangered Species Act are published in the Federal Register for a 30-day public comment period. Please allow at least **90 days** for the application to be processed.

Note 3: USFWS has determined that a trophy consists of raw or tanned parts of a specimen taken by a hunter during sport hunt for personal use. It may include the bones, claws, hair, head, hide, hooves, horns, meat, skull, teeth, tusks, or any taxidermied part, including, but not limited to, a rug or taxidermied head, shoulder, or full mount. It does not include articles made from a trophy, such as worked, manufactured, or handicraft items for use as clothing, curios, ornamentation, jewelry, or other utilitarian items. If you wish to import such products, please contact the Division of Management Authority for the proper application form.

Note 4: Certain hunting trophies, including leopard, elephant, and rhinoceros hunting trophies, are subject to restrictions on their use after import into the United States. Please see 50 CFR 23.55 for more information or contact the Division of Management Authority.

Please provide the following information. Complete all questions on the application. Mark questions that are not applicable with "N/A". If needed, use a separate sheet of paper. On all attachments or separate sheets you are submitting; please indicate the application question number you are addressing. If applying for more than one trophy, be sure to answer questions 1-5 for each trophy addressed in this application. If importing trophies from more than one country, you must submit a separate application for each shipment in order to obtain separate import permits.

1. For each trophy to be imported, provide:
   a. Scientific name (genus, species, and, if applicable, subspecies) and common name.
   - Panthera Pardus Pardus, African Leopard
   - Loxodonta Africana African Elephant
   b. Sex (if known).
   - Male - African Leopard
   - Male - African Elephant
2. **IF ANIMAL IS CURRENTLY LIVING IN THE WILD,** please enter the following:
   a. Country and PLACE (area, region, GIS coordinates, ranch AND nearest city) where wildlife is to be taken from the wild:

      N/A

   b. Date wildlife is to be hunted:

      N/A

   c. Description of the trophy and parts you intend to import (e.g., skin, skull, shoulder mount, life size mount, claws, horn, tusks).

      N/A

3. **IF THE ANIMAL IS DEAD,** please enter the following:
   a. Country and PLACE (area, region, GIS coordinates, ranch AND nearest city) where wildlife was removed from the wild (provide a map if possible):

Leopard - Zimbabwe, Matetsi Unit 3 - Nearest City Victoria Falls
Elephant - Zimbabwe, Matetsi Unit 3 - Nearest City Victoria Falls

   b. Date wildlife was hunted:

      6-29-2016 - Elephant
      7-4-2016 - Leopard

c. Description of the trophy and parts you intend to import (e.g., skin, skull, shoulder mount, life size mount, claws, horn, tusks).
Elephant - Tusks, Skin, Ears, Feet, Tail, Trunk
Leopard - Life size mount

d. The current location of the trophy (address and country) [the U.S. import permit will identify this country as the country of export/re-export and must match with the export/re-export documents]:
47 Goud St. Laboria
Polokwane, Limpopo Province, RSouth Africa 0704

4. Complete name and address of overseas person or business shipping the trophy to you. If you are applying to import a trophy directly from Namibia, you must provide the name and address of the professional hunter listed on your Namibian hunting permit [this name will also appear on your Namibian export permit and must match the U.S. import permit].

Name: David Alexander Hadden
Business Name: Safari Taxidermy
Address: 47 Goud Street Laboria
Address:
City: Polokwane
State/Province: Limpopo Province
Country, Postal Code: RSA 0704

5. Please be aware that the U.S. Fish and Wildlife Service must make a finding that your activities will enhance or benefit wild populations of the species involved. If you have any information that could support this finding (e.g., population status or trend data; how the funds from license/trophy fees will be spent; what portion of the hunting fee will support conservation), please submit such information on a separate page with your application.

CERTIFICATION STATEMENT (original signature must be provided for either 6 or 7 below)

6. **If you are a broker or taxidermist applying on behalf of a foreign national,** provide documentation to show you have a **Power of Attorney** to act on your client's behalf and sign the following statement.

I acknowledge that the sport-hunted trophy/trophies to be imported has been/will be personally hunted by my client and is being imported only for my client's personal use (i.e., **not for sale, transfer, donation, or exchange that is reasonably likely to result in economic use, gain, or benefit**). I understand that my client may only import two leopard trophies in one calendar year (if applicable). In addition, I have advised my client that raw ivory, once imported into the United States, cannot be re-exported.

Taxidermist/Broker's signature: _____ Date: _____

7. **If you are the hunter applying to import your own trophy**, please read and sign the following statement.

I acknowledge that the sport-hunted trophy/trophies to be imported has been/will be personally hunted by me and is being imported only for my personal use (i.e., **not for sale, transfer, donation, or exchange that is reasonably likely to result in economic use, gain, or benefit**). I understand that I may only import two leopard trophies in one calendar year (if applicable). In addition, I understand that raw ivory, once imported into the United States, cannot be re-exported.

Applicant's signature: David Hadden Date: 1-19-2018

Be aware that there may be additional permitting or approval requirements by your local or state government, as well as required by other Federal agencies or foreign government to conduct your propose activity. While the Service will attempt to assist you, it is your responsibility to obtain such approval.

8. All international shipment(s) must be through a designated port. A list of designated ports (where an inspector is posted) is available from http://www.fws.gov/le/designated-ports.html. If you wish to use a port not listed, please contact the Office of Law Enforcement for a Designated Port Exemption Permit (form 3-200-2). Houston, TX

9. Name and address where you wish permit mailed, if different from page 1 (All permits will be mailed via the U.S. Postal Service, unless you identify an alternative means below):

N/A

10. If you wish the permit to be delivered by means other than USPS regular mail, provide an air bill, pre-paid envelope, or billing information. If you do not have a pre-paid envelope or air bill and wish to pay for a courier service with your credit card, please check the box below. Please DO NOT include credit card number or other information; you will be contacted for this information.

☐ If a permit is issued, please send it via a courier service to the address on page 1 or question 9. I understand that you will contact me for my credit card information once the application has been processed.

N/A

11. Who should we contact if we have questions about the application? (Include name, phone number, and email):

David Hadden, (b) (6) [redacted]

12. **Disqualification Factor**. A conviction, or entry of a plea of guilty or nolo contendere, for a felony violation of the Lacey Act, the Migratory Bird Treaty Act, or the Bald and Golden Eagle Protection Act disqualifies any such person from receiving or exercising the privileges of a permit, unless such disqualification has been expressly waived by the Service Director in response to a written petition. (50 CFR 13.21(c)) Have you or any of the owners of the business, if applying as a business, been convicted, or entered a plea of guilty or nolo contendere, forfeited collateral, or are currently under charges for any violations of the laws mentioned above?

☐ Yes ☑ No If you answered "Yes" provide: a) the individual's name, b) date of charge, c) charge(s), d) location of incident, e) court, and f) action taken for each violation.

FEB 1 2 2018

(b) (6)

DAVID (b) HADDEN
(b) (6)
CORPUS CHRISTI, TX (b) (6)

2-1-2018
Date

Pay to the Order of U.S. Fish And Wildlife Service | $ 100 ~~00~~

One Hundred Dollars

Security Features. Details on Back.

WELLS FARGO
Wells Fargo Bank, N.A.
Texas
wellsfargo.com

Elephant Leopard (b) (6)

(b) (6)

Department of the Interior
U.S. Fish and Wildlife Service

OMB No. 1018-0164
Expires 11/30/2016

Federal Fish and Wildlife Permit Application Form

RCVD FEB 28 2018 LB

Return to: U.S. Fish and Wildlife Service
Division of Management Authority (DMA)
Branch of Permits, MS: IA
5275 Leesburg Pike
Falls Church, VA 22041-3803
1-800-358-2104 or 703-358-2104

Type of Activity:
Import of Sport-hunted Trophies of
Southern African Leopard, African Elephant, and
Namibian Southern White Rhinoceros

Complete Sections A or B, and C, D, and E of this application. U.S. address may be required in Section C, see instructions for details.
See attached instruction pages for information on how to make your application complete and help avoid unnecessary delays.

A. Complete if applying as an individual

1.a. Last name	1.b. First name	1.c. Middle name or initial	1.d. Suffix
DOUGLAS	LLOYD	(b) (6)	

2. Date of birth (mm/dd/yyyy)	3. Occupation	4. Affiliation/ Doing business as (see instructions)
(b) (6)		

5.a. Telephone number	5.b. Alternate telephone number	5.c. Fax number	5.d. E-mail address
(b) (6)			

B. Complete if applying on behalf of a business, corporation, public agency, Tribe, or institution

1.a. Name of business, agency, Tribe, or institution	1.b. Doing business as (dba)
N/A	

2. Tax identification no.	3. Description of business, agency, Tribe, or institution

4.a. Principal officer Last name	4.b. Principal officer First name	4.c. Principal officer Middle name/ initial	4.d. Suffix

5. Principal officer title	6. Primary contact name

7.a. Business telephone number	7.b. Alternate telephone number	7.c. Business fax number	7.d. Business e-mail address

C. All applicants complete address information

1.a. Physical address (Street address, Apartment #, Suite #, or Room #, no P.O. Boxes)
(b) (6)

1.b. City	1.c. State	1.d. Zip code/Postal code	1.e. County/Province	1.f. Country
ALEDO	TX	(b) (6)		USA

2.a. Mailing Address (include if different than physical address; include name of contact person if applicable)
(b) (6)

2.b. City	2.c. State	2.d. Zip code/Postal code	2.e. County/Province	2.f. Country
ALEDO	TX	(b) (6)		USA

D. All applicants MUST complete

1. Attach check or money order payable to the U.S. FISH AND WILDLIFE SERVICE **in the amount of $100, nonrefundable processing fee**. Federal, Tribal, State, and local government agencies, and those acting on behalf of such agencies, are exempt from the processing fee – ***attach documentation of fee exempt status as outlined in instructions.*** (50 CFR 13.11(d))

2. Do you currently have or have you ever had any Federal Fish and Wildlife permits?
Yes ☑ If yes, list the number of the most current permit you have held or that you are applying to renew/re-issue MA12428C-0 No ☐

3. Certification: I hereby certify that I have read and am familiar with the regulations contained in ***Title 50, Part 13 of the Code of Federal Regulations*** and the other ***applicable parts in subchapter B of Chapter I of Title 50***, and I certify that the information submitted in this application for a permit is complete and accurate to the best of my knowledge and belief. I understand that any false statement herein may subject me to the criminal penalties of 18 U.S.C. 1001.

Signature of applicant/person responsible for permit (No photocopied or stamped signatures) — Date of signature (mm/dd/yyyy): 02/09/2018

Please continue to next page

E. IMPORT OF SPORT-HUNTED TROPHIES OF SOUTHERN AFRICAN LEOPARD, AFRICAN ELEPHANT, AND NAMIBIAN SOUTHERN WHITE RHINOCEROS

Note 1: If you hold an import permit for a trophy/trophies that you did not use, please **return the unused original permit**. If you are requesting reissuance of a permit because you have taken a trophy, but were unable to import it prior to the expiration of the permit, please use the renewal form (3-200-52; http://www.fws.gov/international/permits/by-form-number/index.html) and return your original permit with that form.

Note 2: *Sport-hunted trophy* is defined at 50 CFR 23.74 as follows: *Sport-hunted trophy* means a whole dead animal or a readily recognizable part or derivative of an animal specifically identified on the accompanying CITES document that meets the following criteria:

(1) Is raw, processed, or manufactured;
(2) Was legally obtained by the hunter through hunting for his or her personal use;
(3) Is being imported, exported, or re-exported by or on behalf of the hunter as part of the transfer from its country of origin ultimately to the hunter's country of usual residence; and
(4) Includes worked, manufactured, or handicraft items made from the sport-hunted animal only when:
  (i) Such items are contained in the same shipment as raw or tanned parts of the sport-hunted animal and are for the personal use of the hunter;
  (ii) The quantity of such items is no more than could reasonably be expected given the number of animals taken by the hunter as shown on the license or other documentation of the authorized hunt accompanying the shipment; and
  (iii) The accompanying CITES documents (export document and, if appropriate, import permit) contain a complete itemization and description of all items included in the shipment.

Note 3: Certain hunting trophies, including leopard, elephant, and rhinoceros hunting trophies, are subject to restrictions on their use after import into the United States. Please see 50 CFR 23.55 for more information or contact the Division of Management Authority.

Please provide the following information. Complete all questions on the application. Mark questions that are not applicable with "N/A". If applying for more than one trophy, be sure to answer questions 2 and 3 for each trophy.

If importing trophies from more than one country, you must submit a separate application for each shipment in order to obtain separate import permits.

1. ENTER the quantity next to the name of the species you are applying to import (you may apply to import specimens of more than one species provided they have been/are being hunted in the same country):

Leopard (*Panthera pardus*) Quantity:_____(Import is limited to two per hunter per calendar year)

African elephant (*Loxodonta africana*) Quantity:__1__(Import is limited to two per hunter per calendar year)
Note: once imported, ivory cannot be re-exported.

Southern white rhinoceros (*Ceratotherium simum simum*) from Namibia Quantity:_____ (An import permit is not required for trophies harvested in South Africa or Swaziland. If you wish to import from a different country, please use form 3-200-37).

2. **IF ANIMAL IS CURRENTLY LIVING IN THE WILD,** please enter the following:
   a. Country and place (area, region, GIS coordinates, ranch AND nearest city) where wildlife is to be taken from the wild:

   b. Date wildlife is to be hunted:

c. Description of the trophy and parts you intend to import (e.g., skin, skull, shoulder mount, life size mount, claws, horns, tusks).

3. **IF THE ANIMAL IS DEAD**, please enter the following:
   a. Country and place (area, region, GIS coordinates, ranch, and/or AND nearest city) where trophy was removed from the wild:

   b. Date wildlife was hunted: Namibia, Concession Area Baleyrwa, GPS Coorinates -18.2912270 23.6067500 21 September 2017

   c. Description of the trophy and parts you intend to import (e.g., skin, skull, shoulder mount, life size mount, claws, horn, tusks):

   2 x tusks, 4 x feet, skull, 2 x ears, 6 x panels, 2 x femur bones, trunk, tail, 2x eye panels, penis.

   d. The current location of the trophy (address and country) [the U.S. import permit will identify this country as the country of export/re-export and must match with the export/re-export document]:

   Trophaendienste CC, Plot 65/16, Kappsfarm, Windhoek, Namibia

4. Complete name and address of overseas person or business shipping the trophy to you. If you are applying to import a trophy directly from Namibia, you **must** provide the name and address of the professional hunter listed on your Namibian hunting permit [this name will appear on the face of the export permit].

Name: Business	Trophaendienste CC;
Name: Address:	Louw Nel; Telephone +264 232 236
Address:	Plot 65/16
City:	Kappsfarm
State/Province:	PO Box 21068
Country, Postal Code:	Windhoek Namibia

5. Please be aware that the U.S. Fish and Wildlife Service may need to make a finding that your activities will enhance or benefit wild populations of the species involved. If you have any information that could support this finding (e.g., how the funds from license/trophy fees will be spent, what portion of the hunting fee will support conservation), please submit such information on a separate page with your application.

Please see current enhancement finding for Namibia.

CERTIFICATION STATEMENT (original signature must be provided for either 6 or 7 below)

6. **If you are a broker or taxidermist applying on behalf of a foreign national,** provide documentation to show you have a **Power of Attorney** to act on your client's behalf and sign the following statement.

   I acknowledge that the sport-hunted trophy/trophies to be imported has been/will be personally hunted by my client and is being imported only for my client's personal use (i.e., **not for sale, transfer, donation, or exchange that is reasonably likely to result in economic use, gain, or benefit**). I understand that my client may only import two leopard trophies in one calendar year. I understand that my client may only import two African elephant trophies in one calendar year. In addition, I have advised my client that raw ivory, once imported into the United States, cannot be re-exported.

   Taxidermist/Broker's signature: N/A _____ Date: _____

7. **If you are the hunter applying to import your own trophy**, please read and sign the following statement.

I acknowledge that the sport-hunted trophy/trophies to be imported has been/will be personally hunted by me and is being imported only for my personal use (i.e., **not for sale, transfer, donation, or exchange that is reasonably likely to result in economic use, gain, or benefit**). I understand that I may only import two leopard trophies in one calendar year. I understand that I may only import two African elephant trophies in one calendar year. In addition, I understand that raw ivory, once imported into the United States, cannot be re-exported.

Applicant's signature: _____ Date: 2/9/2018

Be aware that there may be additional permitting or approval requirements by your local or state governments, as well as required by other Federal agencies or foreign government to conduct your propose activity. While the Service will attempt to assist where possible, it is your responsibility to obtain such approval.

8. All international shipment(s) must be through a designated port. A list of designated ports (where an inspector is posted) is available from http://www.fws.gov/le/designated-ports.html. If you wish to use a port not listed, please contact the Office of Law Enforcement for a Designated Port Exemption Permit (form 3-200-2).

9. Name and address where you wish the permit to be mailed, if different from page 1 (All permits will be mailed via the U.S. Postal Service, unless you identify an alternative means below):

10. If you wish the permit to be delivered by means other than USPS regular mail, provide an air bill, pre-paid envelope, or billing information. If you do not have a pre-paid envelope or air bill and wish to pay for a courier service with your credit card, please check the box below. Please DO NOT include credit card number or other information; you will be contacted for this information.

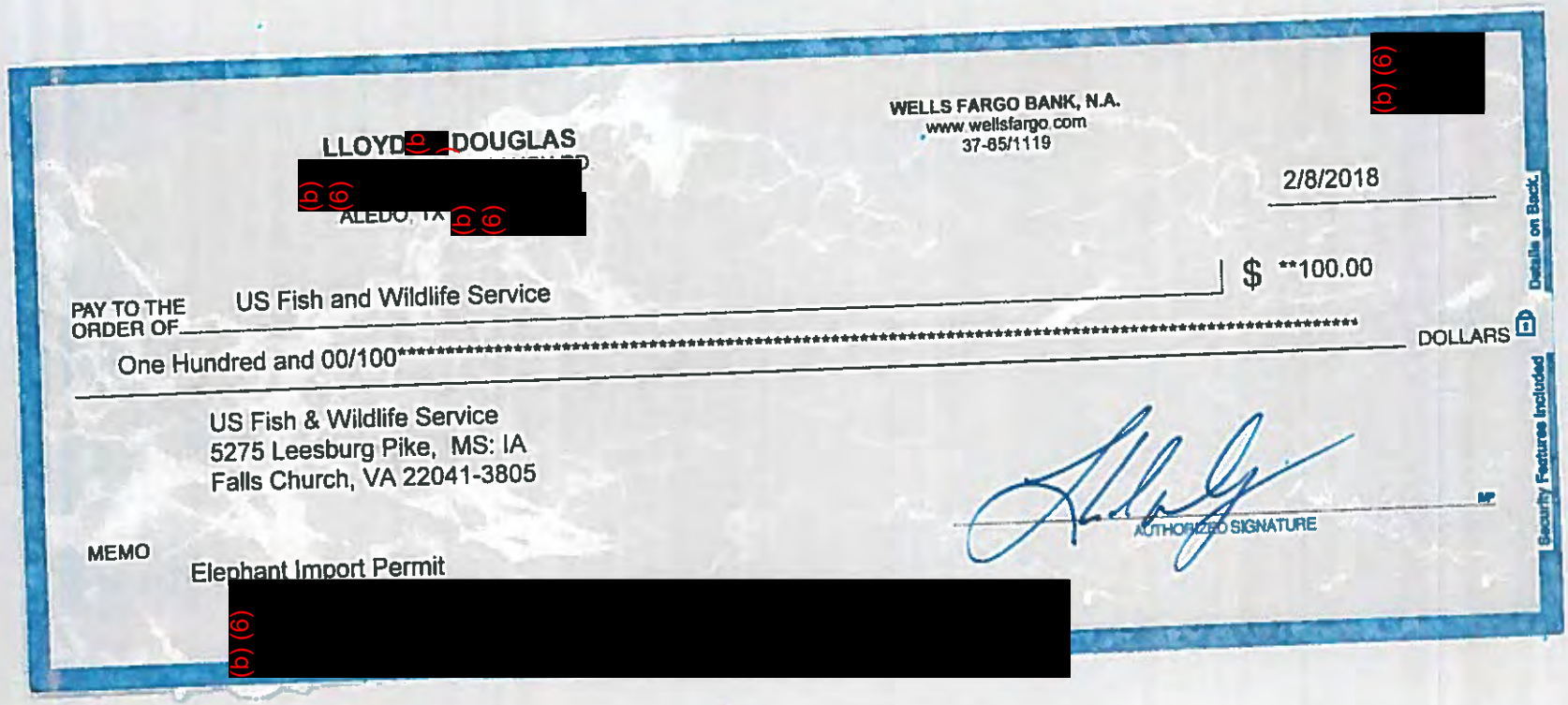
☐ If a permit is issued, please send it via a courier service to the address on page 1 or question 9. I understand that you will contact me for my credit card information once the application has been processed.

11. Who should we contact if we have questions about the application? (Include name, phone number, and email):

Conservation Force, 504-837-1233, cf@conservationforce.org ---------and---------
Lorna Hamblin (b) (6) [redacted]

12. **Disqualification Factor**. A conviction, or entry of a plea of guilty or nolo contendere, for a felony violation of the Lacey Act, the Migratory Bird Treaty Act, or the Bald and Golden Eagle Protection Act disqualifies any such person from receiving or exercising the privileges of a permit, unless such disqualification has been expressly waived by the Service Director in response to a written petition. (50 CFR 13.21(c)) Have you or any of the owners of the business, if applying as a business, been convicted, or entered a plea of guilty or nolo contendere, forfeited collateral, or are currently under charges for any violations of the laws mentioned above?

☐ Yes ☑ No If you answered "Yes" provide: a) the individual's name, b) date of charge, c) charge(s), d) location of incident, e) court, and f) action taken for each violation.



LLOYD [redacted] DOUGLAS
[redacted]
ALEDO, TX [redacted]

WELLS FARGO BANK, N.A.
www.wellsfargo.com
37-85/1119

[redacted]

2/8/2018

PAY TO THE ORDER OF US Fish and Wildlife Service $ **100.00

One Hundred and 00/100********** DOLLARS

US Fish & Wildlife Service
5275 Leesburg Pike, MS: IA
Falls Church, VA 22041-3805

AUTHORIZED SIGNATURE

MEMO Elephant Import Permit

[redacted]

Details on Back. Security Features Included

RCVD MAR 9 2018

March 8, 2018

U S Fish and Wildlife Service
Division of Management Authority
Branch of Permits, MS: IA
5275 Leesburg Pike
Falls Church, VA 22041-3803

RE: Elephant Import Permit

To Whom it Concerns,

My name William (b) (6) Perry, shortly after I heard of the President of the United States signing a bill to legally import elephants from Zimbabwe I booked a hunt. I did harvest a mature elephant shortly before Christmas 2017. It was a very joyous and happy occasion for the village that the elephant was taken by and for myself.

Several hundred people from the village showed up when the elephant was being butchered. 141 families in the village benefited from the meat from the elephant.

There was a financial benefit from the cost of the hunt that was distributed to the people in the village as well.

Your consideration for this permit would be greatly appreciated.

Sincerely,

William (b) (6) Perry

RCVD MAR 9 2018

Form 3-200-19

OMB Control No. 1018-0093
Expires 08/31/2020

Department of Interior
U.S. Fish and Wildlife Service

Federal Fish and Wildlife Permit Application Form

U.S. Fish and Wildlife Service
Division of Management Authority
Branch of Permits, MS: IA
5275 Leesburg Pike
Falls Church, VA 22041-3803
1-800-358-2104 or 703-358-2104

Type of Activity

Import of Sport-hunted Trophies of Southern African Leopard and Namibian Southern White Rhinoceros, African Elephant

Complete Sections A or B, and C, D, and E of this application. U.S. address may be required in Section C, see instructions for details.
You may find instructions on how to make your application complete and help avoid unnecessary delays at the following link: .

Section A: Complete if applying as an individual

1.a. Last Name	1.b. First Name	1.c. Middle Name/Initial	1.d. Suffix
PERRY	WILLIAM	(b) (6)	

2. Date of Birth (mm/dd/yyyy)	3. Telephone Number	3.a. Alternate Telephone Number
(b) (6)		

Section B: Complete if applying on behalf of a business, corporation, public agency, Tribe, or institution

1.a. Name of business, agency, Tribe, or institution	1.b. Doing business as (DBA)
2. Tax identification no.	3. Description of business, agency, Tribe, or institution

4.a. Principal officer Last name	4.b. Principal officer First Name	4.c. Principal officer Middle name/initial	4.d. Suffix
5. Principal officer title	6. Primary contact name		
7.a. Business telephone number	7.b. Alternate telephone number	7.c. Business fax number	7.d. Business e-mail address

Section C: All applicants complete address information

1.a. Physical address (Street address; Apartment #, Suite #, or Room #; no P.O. Boxes)				
(b) (6)				
1.b. City	1.c. State	1.d. Zip code/Postal code	1.e. County/Province	1.f. Country
ANDOVER	KANSAS	(b) (6)		USA

2.a. Mailing address (include if different than physical address; include name of contact person if applicable)				
(b) (6) / ATT: WILLIAM PERRY				
2.b. City	2.c. State	2.d. Zip code/Postal code	2.e. County/Province	2.f. Country
WICHITA	KANSAS	(b) (6)		USA

Section D: All applicants MUST complete

1. Attach check or money order payable to the U.S. FISH AND WILDLIFE SERVICE in the amount identified on page 2, nonrefundable processing fee. Federal, Tribal, State, and local government agencies, and those acting on behalf of such agencies, are exempt from the processing fee – *attach documentation of fee exempt status as outlined in instructions.* [50 CFR 13.11(d)]

2. Certification: I hereby certify that I have read and am familiar with the regulations contained in ***Title 50 Part 13 of the Code of Federal Regulations*** and the other ***applicable parts in subchapter B of Chapter I of Title 50***, and I certify that the information submitted in this application for a permit is complete and accurate to the best of my knowledge and belief. I understand that any false statement herein may subject me to the criminal penalties of 18 U.S.C. 1001.

Signature of applicant/Principal Officer for permit (No photocopied or stamped signatures) Date of signature (mm/dd/yyyy)

William C

Please continue to next page

E. IMPORT OF SPORT-HUNTED TROPHIES OF SOUTHERN AFRICAN LEOPARD AND NAMIBIAN SOUTHERN WHITE RHINOCEROS

Note 1: If you hold an import permit for trophy/trophies that you did not use, please **return the unused original permit to the address on page one.**

Note 2: If you are requesting reissuance of a permit because you have taken a trophy, but were unable to import it prior to the expiration of the permit, please use the renewal form (3-200-52) and return your original permit with that form.

Note 3: *Sport-hunted trophy* is defined at 50 CFR 23.74 as follows: *Sport-hunted trophy* means a whole dead animal or a readily recognizable part or derivative of an animal specifically identified on the accompanying CITES document that meets the following criteria:

- Is raw, processed, or manufactured;
- Was legally obtained by the hunter through hunting for his or her personal use;
- Is being imported, exported, or re-exported by or on behalf of the hunter as part of the transfer from its country of origin ultimately to the hunter's country of usual residence; and
- Includes worked, manufactured, or handicraft items made from the sport-hunted animal only when:
  - i. Such items are contained in the same shipment as raw or tanned parts of the sport-hunted animal and are for the personal use of the hunter;
  - ii. The quantity of such items is no more than could reasonably be expected given the number of animals taken by the hunter as shown on the license or other documentation of the authorized hunt accompanying the shipment; and
  - iii. The accompanying CITES documents (export document and, if appropriate, import permit) contain a complete itemization and description of all items included in the shipment.

Note 4: Certain hunting trophies, including leopard and rhinoceros hunting trophies, are subject to restrictions on their use after import into the United States. Please see 50 CFR 23.55 for more information or contact the Division of Management Authority.

- **Complete all questions on the application.**
- **Mark questions that are not applicable with "N/A".**
- **If applying for more than one trophy, be sure to answer questions 2 and 3 for each trophy.**
- **If importing trophies from more than one country, you must submit a separate application for each shipment in order to obtain separate import permits.**

1. Name and address where you wish the permit to be mailed, if different from page 1. If you would like expedited shipping, please enclose a self-addressed, pre-paid, computer-generated, courier service airway bill. If unspecified, all documents will be mailed via the U.S. Postal Service.

(b) (6) [redacted]

WICHITA, KANSAS (b) (6) [redacted]

ATT: WILLIAM (b) (6) [redacted] PERRY

2. Who should we contact if we have questions about the application (name, phone number, and e-mail)?

WILLIAM (b) (6) [redacted] PERRY

(b) (6) [redacted]

3. Have you or your client (if a broker applying on behalf of your client), been assessed a civil penalty or convicted of any criminal provision of any statute or regulation relating to the activity for which the application is filed; been convicted, or entered a plea of guilty or nolo contendere, for a felony violation of the Lacey Act, the Migratory Bird Treaty Act, or the Bald and Golden Eagle Protection Act; forfeited collateral; OR are currently under charges for any violation of the laws mentioned above?

(No) Yes

If you answered "Yes" to Question 3, provide: a) the individual's name; b) date of charge; c) charge(s); d) location of incident; e) court, and f) action taken for each violation. Please be aware that a "Yes" response does not automatically disqualify you from getting a permit.

4. ENTER the quantity next to the name of the species you are applying to import (you may apply to import specimens of more than one species provided they have been/are being hunted in the same country):

   a. Leopard (*Panthera pardus*) Quantity: ____ (Limited to the import of two per calendar year). If you wish to import a leopard taken in northern or western Africa, please use form 3-200-20.

   b. Southern white rhinoceros (*Ceratotherium simum simum*) from Namibia Quantity: ____ (An import permit is not required for trophies harvested in South Africa or Swaziland. If you are looking to import from a different country, please use Form 3-200-20).

5. **IF ANIMAL IS CURRENTLY LIVING IN THE WILD**, Please enter the following information:

   a. Country and place (area, region, GIS coordinates, ranch, conservancy, management area, or hunting block, AND nearest city) where wildlife is to be taken from the wild:

   b. Date wildlife is to be hunted:

   c. Name of hunting outfitter, safari company, or professional hunter you will be hunting with:

6. **IF THE ANIMAL HAS ALREADY BEEN TAKEN**, please enter the following:

   d. Country and place (area, region, GIS coordinates, ranch, conservancy, management area, or hunting block, AND nearest city) where wildlife is to be taken from the wild:

ZIMBABWE GPS - SE 182526
PROPERTY - MASIKILI VICTORIA FALLS

   e. Date wildlife is to be hunted:

f. Name of hunting outfitter, safari company, or professional hunter you will be hunting with:

g. The current location of the trophy (address and country) [the U.S. import permit will identify this country as the country of export/re-export and must match with the export/re-export document]:

COLLETTS WILDLIFE ARTISTRY
15 JOSIAH CHINAMANO ROAD
BELMONT, BULAWAYO +263 9 885868

7. Please provide a copy of any applicable foreign government permits or licenses that were required to remove this animal from the wild (if you have not hunted yet and do not currently hold any such permits or licenses, please indicate so).

8. Complete name and address of overseas person or business shipping the trophy to you.

   a. If you are applying to import a trophy directly from **Namibia**, you **must** provide the name and address of the professional hunter listed on your Namibian hunting permit [this name will appear on the face of the export permit].

Name: RIANA LIGTHELM
Business Name: SAFARI TAXIDERMY
Address: 47 GOUD STREET
Address: LABORIA
City: POLOKWANE
State/Province:
Country, Postal Code: RSA, 0704

CERTIFICATION STATEMENT (original signature must be provided for either 9 or 10 below)

9. **If you are a broker or taxidermist applying on behalf of a U.S. hunter or foreign national,** provide documentation to show you have a **Power of Attorney** to act on your client's behalf and sign the following statement.

I acknowledge that the sport-hunted trophy/trophies to be imported has been/will be personally hunted by my client and is being imported only for my client's personal use (i.e., **not for sale, transfer, donation, or exchange that is reasonably likely to result in economic use, gain, or benefit**). If applying for the import of a leopard trophy, I understand that my client may only import two leopard trophies in one calendar year.

Taxidermist/Broker's signature: _____ Date: _____

10. **If you are the hunter applying to import your own trophy**, please read and sign the following statement.

I acknowledge that the sport-hunted trophy/trophies to be imported has been/will be personally hunted by me and is being imported only for my personal use (i.e., **not for sale, transfer, donation, or exchange that is reasonably likely to result in economic use, gain, or benefit**). If applying to import a leopard trophy, I understand that I may only import two leopard trophies in one calendar year.

Applicant's signature: William (b) (6) Date: 2/28/18

Be aware that there may be additional permitting or approval requirements by your local or state governments, as well as required by other Federal agencies or foreign government to conduct your propose activity. While the Service will attempt to assist where possible, it is your responsibility to obtain such approval.

11. **All international shipment(s) must be through a designated port. A list of designated ports (where an inspector is posted) is available from the list of designated ports. If you wish to use a port not listed, please contact the Office of Law Enforcement for a Designated Port Exemption Permit (form 3-200-2).**

PORT: DFW AIRPORT, TEXAS 75261

PHYSICAL: 1639 WEST 23, STE 105
PHONE: (972) 574-3254
FAX: (972) 574-4669

E. IMPORT OF SPORT-HUNTED TROPHIES OF SOUTHERN AFRICAN LEOPARD, AFRICAN ELEPHANT, AND NAMIBIAN SOUTHERN WHITE RHINOCEROS

Note 1: If you hold an import permit for a trophy/trophies that you did not use, please **return the unused original permit**. If you are requesting reissuance of a permit because you have taken a trophy, but were unable to import it prior to the expiration of the permit, please use the renewal form (3-200-52; http://www.fws.gov/international/permits/by-form-number/index.html) and return your original permit with that form.

Note 2: *Sport-hunted trophy* is defined at 50 CFR 23.74 as follows: *Sport-hunted trophy* means a whole dead animal or a readily recognizable part or derivative of an animal specifically identified on the accompanying CITES document that meets the following criteria:

(1) Is raw, processed, or manufactured;
(2) Was legally obtained by the hunter through hunting for his or her personal use;
(3) Is being imported, exported, or re-exported by or on behalf of the hunter as part of the transfer from its country of origin ultimately to the hunter's country of usual residence; and
(4) Includes worked, manufactured, or handicraft items made from the sport-hunted animal only when:
  (i) Such items are contained in the same shipment as raw or tanned parts of the sport-hunted animal and are for the personal use of the hunter;
  (ii) The quantity of such items is no more than could reasonably be expected given the number of animals taken by the hunter as shown on the license or other documentation of the authorized hunt accompanying the shipment; and
  (iii) The accompanying CITES documents (export document and, if appropriate, import permit) contain a complete itemization and description of all items included in the shipment.

Note 3: Certain hunting trophies, including leopard, elephant, and rhinoceros hunting trophies, are subject to restrictions on their use after import into the United States. Please see 50 CFR 23.55 for more information or contact the Division of Management Authority.

Please provide the following information. Complete all questions on the application. Mark questions that are not applicable with "N/A". If applying for more than one trophy, be sure to answer questions 2 and 3 for each trophy.

If importing trophies from more than one country, you must submit a separate application for each shipment in order to obtain separate import permits.

1. ENTER the quantity next to the name of the species you are applying to import (you may apply to import specimens of more than one species provided they have been/are being hunted in the same country):

Leopard (*Panthera pardus*) Quantity:_____(Import is limited to two per hunter per calendar year)

African elephant (*Loxodonta africana*) Quantity:__1__(Import is limited to two per hunter per calendar year)
Note: once imported, ivory cannot be re-exported.

Southern white rhinoceros (*Ceratotherium simum simum*) from Namibia Quantity:_____ (An import permit is not required for trophies harvested in South Africa or Swaziland. If you wish to import from a different country, please use form 3-200-37).

2. **IF ANIMAL IS CURRENTLY LIVING IN THE WILD**, please enter the following:
   a. Country and place (area, region, GIS coordinates, ranch AND nearest city) where wildlife is to be taken from the wild:

   b. Date wildlife is to be hunted:

CERTIFICATE OF OWNERSHIP OF IVORY AND RHINOCEROS HORN

(Issued in terms of section 77 of the Parks and Wildlife (General) Regulations, 1990)

THE AREA MANAGER
PARKS AND WILDLIFE MANAGEMENT AUTHORITY
MATETSI SAFARI AREA
21 DEC 2017
P. BAG 5926
VICTORIA FALLS

Specified officer's signature and date-stamp

Cert. № 120584

Name William [redacted] Perry

(b)(6) [redacted]

Address Andover Kansas

United States

Tusk serial number	2W 2017 25075
Tusk mass (kg)	13 kg
Tusk length (metric)	141 cm
Sex	M

Authority 079972

Signature of holder [signature]

Notes

1. This certificate must be returned to the *Director, Department of National Parks and Wildlife Management, P.O. Box CY 140, Causeway*, in the event of the tusk being cut up for manufacturing purposes, lost, stolen or exported.
2. Transfer/sale of ivory or horn is to be done at National Parks offices.

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CERTIFICATE OF OWNERSHIP OF IVORY AND RHINOCEROS HORN

(Issued in terms of section 77 of the Parks and Wildlife (General) Regulations, 1990)

THE AREA MANAGER
PARKS AND WILDLIFE MANAGEMENT AUTHORITY
MATETSI SAFARI AREA
21 DEC 2017
P. BAG 5926
VICTORIA FALLS

Specified officer's signature and date-stamp

Cert. No. 120585

Name William [redacted] Perry

(b) (6) [redacted]

Address Andover Kansas
United States

Tusk serial number	2w2017 - 25074
Tusk mass (kg)	13 Kg.
Tusk length (metre)	1.39 cm
Sex	M

Authority 079772

Signature of holder [redacted]

Notes

1. This certificate must be returned to the *Director, Department of National Parks and Wildlife Management, P.O. Box CY 140, Causeway*, in the event of the tusk being cut up for manufacturing purposes, lost, stolen or exported.
2. Transfer/sale of ivory or horn is to be done at National Parks offices.

/2017-LOX

ELEPHANT

TROPHY EXPORT TAG

ZW 087/500/2017-LOX

RCVD MAR 9 2018

WILLIAM (b) PERRY (b) (6)
(b) (6) (6)
(b) (6)
ANDOVER, KS

(b) (6)

2/28/18
Date

Pay to the Order of Federal Fish & Wildlife Service $ 100^00

One Hundred ^00/100 Dollars

EMPRISE BANK
www.emprisebank.com

For ELEPHANT PERMIT FEE William C P MP

(b) (6)

Department of the Interior
U.S. Fish and Wildlife Service

OMB No. 1018-0164
Expires 11/30/2016

Federal Fish and Wildlife Permit Application Form

Return to: U.S. Fish and Wildlife Service
Division of Management Authority (DMA)
Branch of Permits, MS: IA
5275 Leesburg Pike
Falls Church, VA 22041-3803
1-800-358-2104 or 703-358-2104

Type of Activity:
Import of Sport-hunted Trophies of Southern African Leopard, African Elephant, and Namibian Southern White Rhinoceros

RCVD MAR 08 2018

Complete Sections A or B, and C, D, and E of this application. U.S. address may be required in Section C, see instructions for details.
See attached instruction pages for information on how to make your application complete and help avoid unnecessary delays.

A. Complete if applying as an individual

1.a. Last name	1.b. First name	1.c. Middle name or initial	1.d. Suffix
Bundrant	Ernest	(b) (6)	

2. Date of birth (mm/dd/yyyy)	3. Occupation	4. Affiliation/ Doing business as (see instructions)
(b) (6)		

5.a. Telephone number	5.b. Alternate telephone number	5.c. Fax number	5.d. E-mail address
(b) (6)	(925) 417 5270	(925) 417 0170	import@b.hunter-international.net

B. Complete if applying on behalf of a business, corporation, public agency, Tribe, or institution

1.a. Name of business, agency, Tribe, or institution	1.b. Doing business as (dba)
N/A	

2. Tax identification no.	3. Description of business, agency, Tribe, or institution

4.a. Principal officer Last name	4.b. Principal officer First name	4.c. Principal officer Middle name/ initial	4.d. Suffix

5. Principal officer title	6. Primary contact name

7.a. Business telephone number	7.b. Alternate telephone number	7.c. Business fax number	7.d. Business e-mail address

C. All applicants complete address information

1.a. Physical address (Street address; Apartment #, Suite #, or Room #; no P.O. Boxes)
(b) (6)

1.b. City	1.c. State	1.d. Zip code/Postal code:	1.e. County/Province	1.f. Country
Peralta	NM	(b) (6)		USA

2.a. Mailing Address (include if different than physical address; include name of contact person if applicable)
-same-

2.b. City	2.c. State	2.d. Zip code/Postal code:	2.e. County/Province	2.f. Country

D. All applicants MUST complete

1. Attach check or money order payable to the U.S. FISH AND WILDLIFE SERVICE **in the amount of $100, nonrefundable processing fee**. Federal, Tribal, State, and local government agencies, and those acting on behalf of such agencies, are exempt from the processing fee – ***attach documentation of fee exempt status as outlined in instructions.*** (50 CFR 13.11(d))

2. Do you currently have or have you ever had any Federal Fish and Wildlife permits?
Yes ☐ If yes, list the number of the most current permit you have held or that you are applying to renew/re-issue: _____ No ☑

3. Certification: I hereby certify that I have read and am familiar with the regulations contained in ***Title 50, Part 13 of the Code of Federal Regulations*** and the other ***applicable parts in subchapter B of Chapter I of Title 50***, and I certify that the information submitted in this application for a permit is complete and accurate to the best of my knowledge and belief. I understand that any false statement herein may subject me to the criminal penalties of 18 U.S.C. 1001.

Atty. In Fact For Ernest Bundrant — 02/28/2018
Signature of applicant/person responsible for permit (No photocopied or stamped signatures) — Date of signature (mm/dd/yyyy)

Please continue to next page

E. IMPORT OF SPORT-HUNTED TROPHIES OF SOUTHERN AFRICAN LEOPARD, AFRICAN ELEPHANT, AND NAMIBIAN SOUTHERN WHITE RHINOCEROS

Note 1: If you hold an import permit for a trophy/trophies that you did not use, please **return the unused original permit**. If you are requesting reissuance of a permit because you have taken a trophy, but were unable to import it prior to the expiration of the permit, please use the renewal form (3-200-52; http://www.fws.gov/international/permits/by-form-number/index.html) and return your original permit with that form.

Note 2: *Sport-hunted trophy* is defined at 50 CFR 23.74 as follows: *Sport-hunted trophy* means a whole dead animal or a readily recognizable part or derivative of an animal specifically identified on the accompanying CITES document that meets the following criteria:

(1) Is raw, processed, or manufactured;
(2) Was legally obtained by the hunter through hunting for his or her personal use;
(3) Is being imported, exported, or re-exported by or on behalf of the hunter as part of the transfer from its country of origin ultimately to the hunter's country of usual residence; and
(4) Includes worked, manufactured, or handicraft items made from the sport-hunted animal only when:
(i) Such items are contained in the same shipment as raw or tanned parts of the sport-hunted animal and are for the personal use of the hunter;
(ii) The quantity of such items is no more than could reasonably be expected given the number of animals taken by the hunter as shown on the license or other documentation of the authorized hunt accompanying the shipment; and
(iii) The accompanying CITES documents (export document and, if appropriate, import permit) contain a complete itemization and description of all items included in the shipment.

Note 3: Certain hunting trophies, including leopard, elephant, and rhinoceros hunting trophies, are subject to restrictions on their use after import into the United States. Please see 50 CFR 23.55 for more information or contact the Division of Management Authority.

Please provide the following information. Complete all questions on the application. Mark questions that are not applicable with "N/A". If applying for more than one trophy, be sure to answer questions 2 and 3 for each trophy.

If importing trophies from more than one country, you must submit a separate application for each shipment in order to obtain separate import permits.

1. ENTER the quantity next to the name of the species you are applying to import (you may apply to import specimens of more than one species provided they have been/are being hunted in the same country):

Leopard (*Panthera pardus*) Quantity:_____(Import is limited to two per hunter per calendar year)

African elephant (*Loxodonta africana*) Quantity: 1 (Import is limited to two per hunter per calendar year)
Note: once imported, ivory cannot be re-exported.

Southern white rhinoceros (*Ceratotherium simum simum*) from Namibia Quantity:_____ (An import permit is not required for trophies harvested in South Africa or Swaziland. If you wish to import from a different country, please use form 3-200-37).

2. **IF ANIMAL IS CURRENTLY LIVING IN THE WILD**, please enter the following:
a. Country and place (area, region, GIS coordinates, ranch AND nearest city) where wildlife is to be taken from the wild:

N/A

b. Date wildlife is to be hunted:

c. Description of the trophy and parts you intend to import (e.g., skin, skull, shoulder mount, life size mount, claws, horns, tusks).

3. **IF THE ANIMAL IS DEAD**, please enter the following:
   a. Country and place (area, region, GIS coordinates, ranch, and/or AND nearest city) where trophy was removed from the wild: Klaserie Private Nature Reserve, South Africa

   b. Date wildlife was hunted: August 4, 2018

   c. Description of the trophy and parts you intend to import (e.g., skin, skull, shoulder mount, life size mount, claws, horn, tusks):

   Skull, 2x Skin panels, 4x Feet, 2x Ears, Tail, Trunk, 2x Tusks (ZA/17/2656/16.30MP;ZA/17/2655/14.95MP)

   d. The current location of the trophy (address and country) [the U.S. import permit will identify this country as the country of export/re-export and must match with the export/re-export document]:

   Safari Taxidermy
   47 Goud Street, Laboria, Polokwane, RSA

4. Complete name and address of overseas person or business shipping the trophy to you. If you are applying to import a trophy directly from Namibia, you **must** provide the name and address of the professional hunter listed on your Namibian hunting permit [this name will appear on the face of the export permit].

Name: Business	Safari Taxidermy
Name: Address:	PO Box 235, Ladanna, 0704
Address:	47 Goud Street
City:	Laboria
State/Province:	Polokwane
Country, Postal Code:	RSA

5. Please be aware that the U.S. Fish and Wildlife Service may need to make a finding that your activities will enhance or benefit wild populations of the species involved. If you have any information that could support this finding (e.g., how the funds from license/trophy fees will be spent, what portion of the hunting fee will support conservation), please submit such information on a separate page with your application.

CERTIFICATION STATEMENT (original signature must be provided for either 6 or 7 below)

6. **If you are a broker or taxidermist applying on behalf of a foreign national,** provide documentation to show you have a **Power of Attorney** to act on your client's behalf and sign the following statement.

   I acknowledge that the sport-hunted trophy/trophies to be imported has been/will be personally hunted by my client and is being imported only for my client's personal use (i.e., **not for sale, transfer, donation, or exchange that is reasonably likely to result in economic use, gain, or benefit**). I understand that my client may only import two leopard trophies in one calendar year. I understand that my client may only import two African elephant trophies in one calendar year. In addition, I have advised my client that raw ivory, once imported into the United States, cannot be re-exported.

   Taxidermist/Broker's signature: Atty. In Fact for Ernest P. Bundrant Date: 02/28/2018

7. **If you are the hunter applying to import your own trophy**, please read and sign the following statement.

I acknowledge that the sport-hunted trophy/trophies to be imported has been/will be personally hunted by me and is being imported only for my personal use (i.e., **not for sale, transfer, donation, or exchange that is reasonably likely to result in economic use, gain, or benefit**). I understand that I may only import two leopard trophies in one calendar year. I understand that I may only import two African elephant trophies in one calendar year. In addition, I understand that raw ivory, once imported into the United States, cannot be re-exported.

Applicant's signature:_____ Date: _____

Be aware that there may be additional permitting or approval requirements by your local or state governments, as well as required by other Federal agencies or foreign government to conduct your propose activity. While the Service will attempt to assist where possible, it is your responsibility to obtain such approval.

8. All international shipment(s) must be through a designated port. A list of designated ports (where an inspector is posted) is available from http://www.fws.gov/le/designated-ports.html. If you wish to use a port not listed, please contact the Office of Law Enforcement for a Designated Port Exemption Permit (form 3-200-2).

9. Name and address where you wish the permit to be mailed, **if** different from page 1 (All permits will be mailed via the U.S. Postal Service, unless you identify an alternative means below):

HUNTER INT'L BROKERAGE SERVICES, INC.
5674 Stoneridge Drive, Suite 209
Pleasanton, CA 94588

10. If you wish the permit to be delivered by means other than USPS regular mail, provide an air bill, pre-paid envelope, or billing information. If you do not have a pre-paid envelope or air bill and wish to pay for a courier service with your credit card, please check the box below. Please DO NOT include credit card number or other information; you will be contacted for this information.

☐ If a permit is issued, please send it via a courier service to the address on page 1 or question 9. I understand that you will contact me for my credit card information once the application has been processed.

11. Who should we contact if we have questions about the application? (Include name, phone number, and email):

Vanessa Tabugan
Tel# (925) 417 5270 ext 104 / E-mail: import@b.hunter-international.net

12. **Disqualification Factor**. A conviction, or entry of a plea of guilty or nolo contendere, for a felony violation of the Lacey Act, the Migratory Bird Treaty Act, or the Bald and Golden Eagle Protection Act disqualifies any such person from receiving or exercising the privileges of a permit, unless such disqualification has been expressly waived by the Service Director in response to a written petition. (50 CFR 13.21(c)) Have you or any of the owners of the business, if applying as a business, been convicted, or entered a plea of guilty or nolo contendere, forfeited collateral, or are currently under charges for any violations of the laws mentioned above?

☐ Yes ☑ No If you answered "Yes" provide: a) the individual's name, b) date of charge, c) charge(s), d) location of incident, e) court, and f) action taken for each violation.

SOUTH AFRICAN PROFESSIONAL HUNTING REGISTER AND TROPHY EXPORT APPLICATION

No: 66007

Professional Hunters' Association of South Africa

Duration of Hunt: Commenced 2 / 8 / 2017 Terminated 4 / 8 / 2017

Tick appropriate Province block where hunt took place (separate sheet for each province)

KwaZulu-Natal (KZN)	Free State (FS)	Gauteng (GP)	Limpopo Province (LP)	North West (NW)	Mpumalanga (MPA)	Western Cape (WC)	Eastern Cape (EC)	Northern Cape (NC)
					X			

Post Permit to (Mark correct block with X)

PROFESSIONAL HUNTER

Name: H SWANEPOEL

Business Address: P.O. BOX 382

GRAVELOTTE

Code: 0895

ID No: 7111 13 5216 081

PH Permit No: MTPA/PH/1899

Date: 5/8/2017 Signature:

CLIENT

Name: ERNEST (9)(9) BUNDRANT

Permanent Postal Address (9)(9)

PERALTA, NEW MEXICO Code:

Country: U.S.A. Tel/Fax: (9)(9)

Passport No (9)(9)

Email (9)(9)

Date: 5/8/2017 Signature: Ernest (9)(9) Bundrant

HUNTING OUTFITTER

Name: SANDY McDONALD

Business Address: FARM KAREEBOSCH

POLOKWANE Code: 0699

I.D. No: 6508305086080

Tel No: 0783227709 Fax No: N/A

HO Permit No: MTPA/HO/0803

Date: 5/8/2017 Signature:

Farm Name Registration No	Magisterial District	Name & Residential Address of Land Owner	Hunting Permit Certificate/Licence No	Date Killed/ Wounded	Species Killed or Wounded	No. Killed or Wounded	Sex F	Sex M	Parts of Trophy to be Exported
KLASERIE PNR.	HOEDSPRUIT	C - ROWLES KPNR.	14154	4/8	ELEPHANT	K		1	TUSKS, SKIN, FEET, EARS, TAIL, TRUNK, SKULL

Address to which trophies are to be sent: AS ABOVE

Code: Country: U-S-A. Trophy Export Date (Estimate):

Conservation Levy

Total:

Copies: Client Original White; Hunting Outfitter 1st Copy Pink; Taxidermist 2nd Copy Blue; Professional Hunter 3rd Copy Green; Last Copy Yellow

Forward to Nature Conservation Authority where hunt took place
Retain for a period of three years
Taxidermist
Remains in book

NB: Voluntary conservation contributions for every trophy taken would be appreciated. These funds go towards wildlife conservation, the upliftment of communities, research projects and many more

Permit No: 14154

Mpumalanga
TOURISM AND PARKS AGENCY

PERMIT FOR THE HUNTING OF

(Issued in terms of the Provisions of the Nature Conservation Act 10 of 1998)

MPUMALANGA TOURISM & PARKS AGENCY
PROFESSIONAL HUNTING
Date Stamp
2017 -07- 27
PRIVATE BAG X 11338
NELSPRUIT 1200

★ [X] SPECIALLY PROTECTED GAME
★ [ ] PROTECTED GAME
★ [ ] ORDINARY GAME DURING A PERIOD WHICH IS *NOT AN OPEN SEASON*
★ [ ] PROTECTED WILD ANIMALS
★ [X] GAME IN A NATURE RESERVE

★ *Mark the square as indicated in the authorisation of the Chief Executive Officer.*

Full name ERNEST (b) (6) BUNDRANT (# (b) (6)

and residential address of the holder of the permit (b) (6) PERALTA, NEW MEXICO, USA.

Name of the owner of the land to be hunted on COLIN ROWLES (HO - SANDY MCDONALD

PARTICULARS OF THE HUNT

Name of farm or nature reserve and district in which it is situated	Species, number and sex of game which may be hunted	Species, number and sex of game hunted and the time and date on which it was hunted
KLASSIE PNR MACHADORP	ONE (1) ELEPHANT BULL	

TO BE HUNTED IN ACCORDANCE WITH THE APNR HUNTING PROTOCOL AND APPROVED QUOTA

In terms of and subject to the provisions of the Nature Conservation Act 10 of 1998, the holder of the permit is hereby authorised to hunt the species, number and sex of the game referred to in the second column of the particulars of the hunt on the farm or nature reserve referred to in the first column thereof during the period of validity of the permit, subject to the conditions of the permit.

PERIOD OF VALIDITY OF THE PERMIT

The permit shall be valid for the period 02/08/2017

to 14/08/2017

VEEARTSNY PERMIT WORD OOK BENODIG:
VIR VERVOER VAN LEWENDE WILD EN ROU
VLEIS OF PRODUKTE.
VETERINARY PERMIT IS ALSO REQUIRED:
FOR TRANSPORT OF LIVE GAME AND RAW
MEAT OR PRODUCTS.

Number and date of the authorisation of the Chief Executive Officer .....

Permit/licence Fees:

Received R 5000-00 + R100 ADMIN FEE Receipt No E/7

Signature of the person authorised by the Chief Executive Officer to issue the permit. Ernest P Bundrant

TO BE FORWARDED TO:
WILDLIFE PROTECTION SERVICES
Private Bag X11338, Nelspruit, 1200 • Tel +27 (0)13 759 5300/1 • Fax +27 (0)13 759 5490

SEE CONDITIONS & REQUIREMENTS ON REVERSE SIDE

Printed by White River Printers 013 751 2478

CUSTOMS POWER OF ATTORNEY

and

Acknowledgment of Terms and Conditions of Service

Social Security number (b) (6) [redacted]

Date of birth (b) (6) [redacted]

Know all men by these presents: That, ERNEST (b) (6) [redacted] BUNDRANT

(Full legal name of individual)

residing at (b) (6) [redacted] PERALTA NEW MEXICO (b) (6) [redacted]

(Residential or physical mailing address, P.O. Box is not accepted)

hereby constitutes and appoints: **HUNTER INTERNATIONAL BROKERAGE SERVICES, INC., its officers, authorized employees and duly appointed sub-agents** to act for and on its behalf as a true and lawful agent and attorney of the grantor named above for and in the name, place, and stead of said grantor from this date and in all Customs Districts, and in no other name to make, endorse, sign, declare, or swear to any entry, withdrawal, declaration, certificate, bill of lading, carnet or other document required by law or regulation in connection with the importation, transportation, or exportation of any merchandise shipped or consigned by or to said grantor, to perform any act or condition which may be required by law or regulation in connection with such merchandise to receive any merchandise deliverable to said grantor:

To make endorsements on bills of lading conferring authority to transfer title, make entry or collect drawback, and to make sign, declare, or swear to any statement, supplemental statement, schedule, supplemental schedule, certificate of delivery, certificate of manufacture, certificate of manufacture and delivery, abstract of manufacturing records, declaration of proprietor on drawback entry, declaration of exporter on drawback entry, or any other affidavit or document which may be required by law or regulation for drawback purposes, regardless of whether such bill of lading, sworn statement, schedule, certificate, abstract, declaration, or other affidavit or document is intended for filing in any customs district:

To sign, seal and deliver for and as the act of said grantor any bond required by law or regulation in connection with the entry or withdrawal of imported merchandise or merchandise exported with or without benefit of drawback, or in connection with the entry, clearance, lading, unlading or navigation of any vessel or other means of conveyance owned or operated by said grantor, and any and all bonds which may be voluntarily given and accepted under applicable laws and regulations, consignee's and owner's declarations provided for in section 485, Tariff Act of 1930, as amended, or affidavits in connection with the entry of merchandise;

To sign and swear to any document and to perform any act that may be necessary or required by law or regulation in connection with the entering, clearing, lading, unlading, or operation of any vessel or other means of conveyance owned or operated by said grantor;

To authorize other Customs Brokers to act as grantor's agent; to receive, endorse and collect checks issued for Customs duty refunds in grantor's name drawn on the Treasurer of the United States; if the grantor is a nonresident of the United States, to accept service of process on behalf of the grantor;

To waive the requirement of other Customs Brokers transmitting a copy of the customs entry CF7501 and the Customs Broker's bill of services directly to the undersigned grantor in accordance with CF 111.36(a) & (b). Such entry summary and bill will be transmitted through Hunter International Brokerage Services, Inc. It is also understood that the agreement between Hunter International Brokerage Services, Inc. and other Customs Brokers does not forbid or prevent the Customs Broker from having direct contact with the grantor in accordance with CFR 111.36(c)(3).

To generally to transact at the customs houses in any district any and all customs business, including making, signing, and filing of protests under section 514 of the Tariff Act of 1930, in which said grantor is or may be concerned or interested and which may properly be transacted or performed by an agent and attorney, giving to said agent and attorney full power and authority to do anything whatever requisite and necessary to be done in the premises as fully as said grantor could do if present and acting, hereby ratifying and confirming all that the said agent and attorney shall lawfully do by virtue of these presents the forgoing power of attorney to remain in full force until notice of revocation in writing is duly given to and received by a District Director of Customs.

The undersigned grantor of this power of attorney hereby agrees to HUNTER INTERNATIONAL BROKERAGE SERVICES, INC. Terms and Conditions of Service, which are attached hereto and incorporated herein by reference.

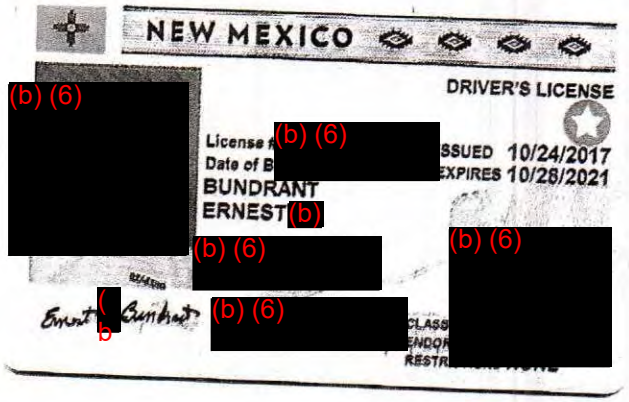
IN WITNESS WHEREOF, the said (Print full legal name) ERNEST (b) (6) [redacted] BUNDRANT

has caused these presents to be sealed and signed: (Signature) Ernest (b) (6) [redacted] Bundrant

(Capacity) _____ (Date) FEBRUARY 16 2018

Important note: If you are the importer of record, payment to the broker will not relieve you of liability for Customs charges (duties, taxes or other debts owed Customs) in the event the charges are not paid by the broker. Therefore, if you pay by check, Customs charges may be paid with a separate check payable to the "U.S. Customs Service" which shall be delivered to Customs by the broker. Importers who wish to utilize this procedure must contact our office in advance to arrange timely receipt of duty checks.

(Mandatory requirement to validate this POA is to provide a CLEAR copy of your passport or driver's license or have this document notarized and mail to our office at Hunter Int'l., 5674 Stoneridge Drive, Ste 209, Pleasanton, CA 94588, tel (925) 417-5270, fax (925) 417-0170)


NEW MEXICO
DRIVER'S LICENSE
(b) (6)
License #
(b) (6)
Date of B
ISSUED 10/24/2017
EXPIRES 10/28/2021
BUNDRANT
ERNEST (b)
(b) (6)
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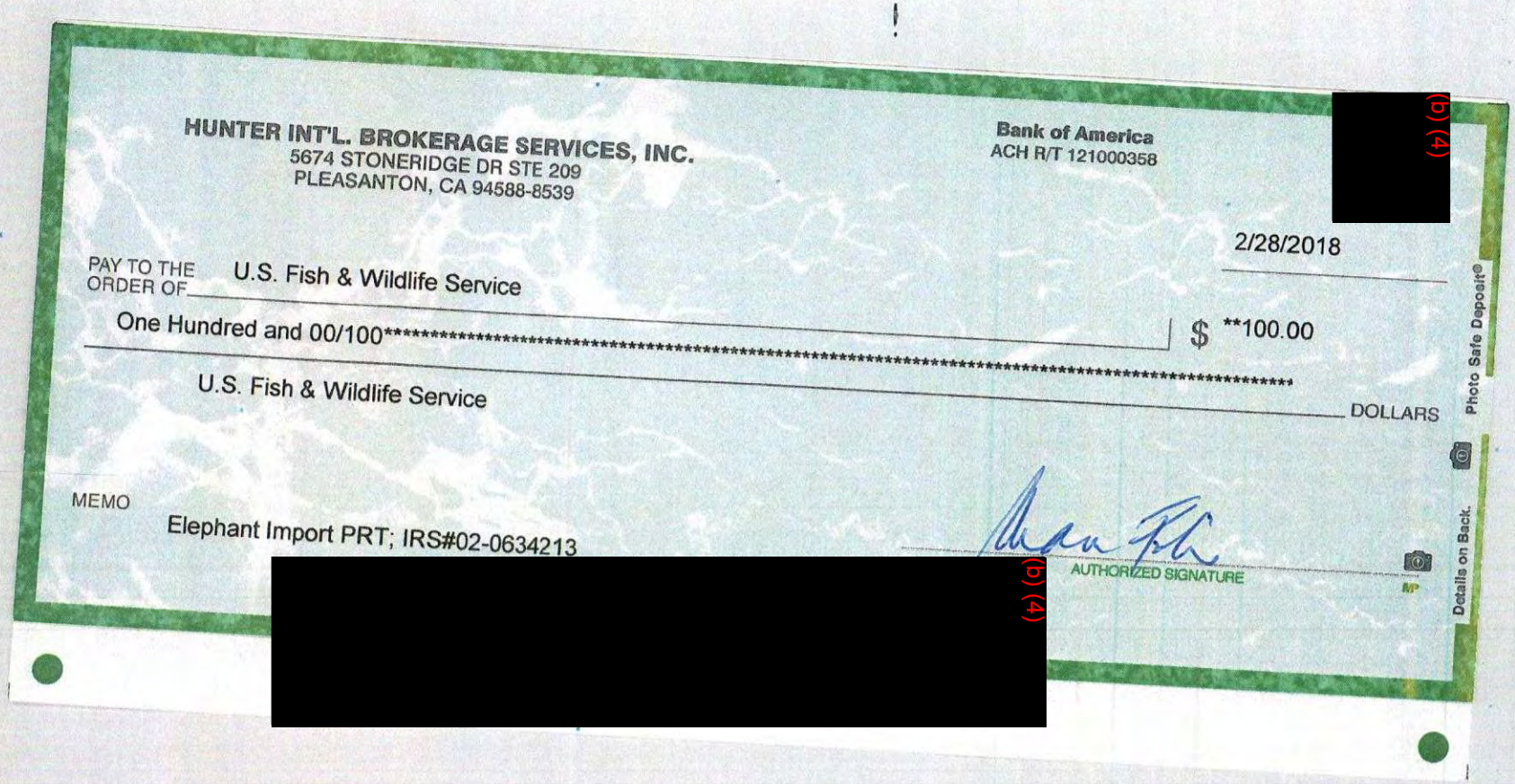
CLASS
ENDOR
RESTR



HUNTER INT'L. BROKERAGE SERVICES, INC.
5674 STONERIDGE DR STE 209
PLEASANTON, CA 94588-8539

Bank of America
ACH R/T 121000358

[redacted] (b) (4)

2/28/2018

PAY TO THE ORDER OF U.S. Fish & Wildlife Service

$ **100.00

One Hundred and 00/100**********

U.S. Fish & Wildlife Service

DOLLARS

Photo Safe Deposit®

Details on Back.

MEMO Elephant Import PRT; IRS#02-0634213

[redacted] (b) (4)

AUTHORIZED SIGNATURE

NOTICE OF REPRESENTATION

This is a notice to the U.S. Fish and Wildlife Service that I have appointed John J. Jackson, III and Regina Lennox of the non-profit firm Conservation Force as my attorneys and legal representatives for all matters concerning my applications for a permit to import a lawfully hunted _Bull Elephant____ trophy.

This authority is inclusive and extends to all applications and filings, whether administrative or judicial, including but not limited to any request for reconsideration, appeal, and litigation.

I also request that these attorneys, through the address for Conservation Force below, be copied with all correspondence, acknowledgements, notices and decisions concerning my application to import my trophy at the following address:

Conservation Force
3240 S. I-10 Service Road W., Suite 200
Metairie, Louisiana 70001 USA
T: (504) 837-1233
F: (504) 837-1145
E: cf@conservationforce.org

Signed: Dwight Miloff

Name: Dwight MILOFF

Date: 3/8/18

Form 3-200-20

Department of the Interior
U.S. Fish and Wildlife Service

Federal Fish and Wildlife Permit Application Form

OMB Control No. 1018-0093
Expires Rev. 08/31/2020

MAR 2 3 2018

Return to: U.S. Fish and Wildlife Service
Division of Management Authority (DMA)
Branch of Permits, MS: IA
5275 Leesburg Pike
Falls Church, VA 22041-3803
1-800-358-2104 or 703-358-2104

Type of Activity:

IMPORT OF SPORT-HUNTED TROPHIES
(Appendix I of CITES and/or ESA)

Complete Sections A or B, and C, D, and E of this application. U.S. address may be required in Section C, see instructions for details.
See attached instruction pages for information on how to make your application complete and help avoid unnecessary delays.

A. Complete if applying as an individual

1.a. Last name	1.b. First name	1.c. Middle name or initial	1.d. Suffix
Miloff	Dwight	(b) (6)	

2. Date of birth (mm/dd/yyyy)	3. Telephone number	3.a. Alternate telephone number	4. E-mail address
(b) (6)			

B. Complete if applying on behalf of a business, corporation, public agency, Tribe, or institution

1.a. Name of business, agency, Tribe, or institution	1.b. Doing business as (dba)		
2. Tax identification no.	3. Description of business, agency, Tribe, or institution		
4.a. Principal officer Last name	4.b. Principal officer First name	4.c. Principal officer Middle name/ initial	4.d. Suffix
5. Principal officer title	6. Primary contact name		
7.a. Business telephone number	7.b. Alternate telephone number	7.c. Business fax number	7.d. Business e-mail address

C. All applicants complete address information

1.a. Physical address (Street address; Apartment #, Suite #, or Room #; no P.O. Boxes) (If Broker or Taxidermist is applying on behalf of a foreign national, provide Broker or Taxidermist's name and address in this block; U.S. hunters must provide their U.S. address)
(b) (6)

1.b. City	1.c. State	1.d. Zip code/Postal code:	1.e. County/Province	1.f. Country
Billings	Montana	(b) (6)		USA

2.a. Mailing Address (include if different than physical address; include name of contact person if applicable)
Same as above

2.b. City	2.c. State	2.d. Zip code/Postal code:	2.e. County/Province	2.f. Country

D. All applicants MUST complete

1. Attach check or money order payable to the U.S. FISH AND WILDLIFE SERVICE **in the amount of $100, nonrefundable processing fee**. Federal, Tribal, State, and local government agencies, and those acting on behalf of such agencies, are exempt from the processing fee – ***attach documentation of fee exempt status as outlined in instructions.*** (50 CFR 13.11(d))

2. Certification: I hereby certify that I have read and am familiar with the regulations contained in ***Title 50, Part 13 of the Code of Federal Regulations*** and the other ***applicable parts in subchapter B of Chapter I of Title 50***, and I certify that the information submitted in this application for a permit is complete and accurate to the best of my knowledge and belief. I understand that any false statement herein may subject me to the criminal penalties of 18 U.S.C. 1001.

Dwight Miloff — 3/8/18

Signature of applicant/Principal Officer for permit (No photocopied or stamped signatures) — Date of signature (mm/dd/yyyy)

Please continue to next page

E. IMPORT OF SPORT-HUNTED TROPHIES *(Appendix I of CITES and/or ESA)*

Note 1: This form should be used to request authorization to import trophies of species listed on Appendix I of CITES and/or as threatened or endangered under the ESA (examples include elephants, lions, cheetahs, wood bison, and markhor).

PLEASE USE FORM 3-200-19 FOR SOUTHERN AFRICAN LEOPARD TROPHIES AND SOUTHERN WHITE RHINOCEROS TROPHIES TAKEN IN NAMIBIA.

Note 2: If you hold an import permit for trophy/trophies that you did not use, please **return the unused original permit.** If you are requesting reissuance of a permit because you have taken a trophy, but were unable to import it prior to the expiration of the permit, please use the renewal form (3-200-52) and return your original permit with that form.

Note 3: Applications for species listed as endangered under the U.S. Endangered Species Act are published in the Federal Register for a 30-day public comment period. Please allow at least **90 days** for the application to be processed.

Note 4: *Sport-hunted trophy* is defined at 50 CFR 23.74 as follows: *Sport-hunted trophy* means a whole dead animal or a readily recognizable part or derivative of an animal specifically identified on the accompanying CITES document that meets the following criteria:
(1) Is raw, processed, or manufactured;
(2) Was legally obtained by the hunter through hunting for his or her personal use;
(3) Is being imported, exported, or re-exported by or on behalf of the hunter as part of the transfer from its country of origin ultimately to the hunter's country of usual residence; and
(4) Includes worked, manufactured, or handicraft items made from the sport-hunted animal only when:
(i) Such items are contained in the same shipment as raw or tanned parts of the sport-hunted animal and are for the personal use of the hunter;
(ii) The quantity of such items is no more than could reasonably be expected given the number of animals taken by the hunter as shown on the license or other documentation of the authorized hunt accompanying the shipment; and
(iii)The accompanying CITES documents (export document and, if appropriate, import permit) contain a complete itemization and description of all items included in the shipment.

Note 5: Certain hunting trophies, including elephants, are subject to restrictions on their use after import into the United States. Please see 50 CFR 23.55 for more information or contact the Division of Management Authority.

Please provide the following information. Complete all questions on the application. Mark questions that are not applicable with "N/A". If needed, use a separate sheet of paper. On all attachments or separate sheets you are submitting; please indicate the application question number you are addressing. If applying for more than one trophy, be sure to answer questions 1-6 for each trophy addressed in this application. If importing trophies from more than one country, you must submit a separate application for each shipment in order to obtain separate import permits.

---

1. Name and address where you wish the permit to be mailed, **if different from page 1**. If you would like expedited shipping, please enclose a self-addressed, pre-paid, computer-generated, courier service airway bill. If unspecified, all documents will be mailed via regular mail through the U.S. Postal Service.

   Same Address

2. Who should we contact if we have questions about the application (name, phone number, and e-mail)?

   Dwight Miloff (b) (6) [redacted]

3. Have you or your client (if a broker applying on behalf of your client), been assessed a civil penalty or convicted of any criminal provision of any statute or regulation relating to the activity for which the

application is filed; been convicted, or entered a plea of guilty or nolo contendere, for a felony violation of the Lacey Act, the Migratory Bird Treaty Act, or the Bald and Golden Eagle Protection Act; forfeited collateral; OR are currently under charges for any violation of the laws mentioned above?

No X Yes ____

If you answered "Yes" to Question 3, provide: a) the individual's name; b) date of charge; c) charge(s); d) location of incident; e) court, and f) action taken for each violation. Please be aware that a "Yes" response does not automatically disqualify you from getting a permit.

4. For each trophy to be imported, provide:

   a. Scientific name (genus, species, and, if applicable, subspecies) and common name.

   Loxodonta Africana African Elephant

   b. Sex (if known). Male

5. **IF ANIMAL IS CURRENTLY LIVING IN THE WILD**, please enter the following information:

   a. Country and place (area, region, GIS coordinates, ranch, conservancy, management area, or hunting block, AND nearest city) where wildlife is to be taken from the wild:

   Matetsi Unit 1 in Zimbabwe . Nearest City is Victoria Falls.

   b. Date wildlife is to be hunted: 10/5/2018 thru 10/18/2018

   b. Name of hunting outfitter, safari company, or professional hunter you will be hunting with:

   KLIPKRAAL SAFARI SERVICES & AGENCIES. Gary Hopkins PH.

6. **IF THE TROPHY HAS ALREADY BEEN TAKEN**, please enter the following:

   a. Country and place (area, region, GIS coordinates, ranch, conservancy, management area, or hunting block, AND nearest city) where trophy was removed from the wild:

   b. Date wildlife was hunted:

   b. Name of hunting outfitter, safari company, or professional hunter you hunted with:

   c. The current location of the trophy (address and country) [the U.S. import permit will identify this country as the country of export/re-export and must match with the export/re-export document]:

7. Please provide a copy of any applicable foreign government permits or licenses that were required to remove this animal from the wild (if you have not hunted yet and do not currently hold any such permits or licenses, please indicate so). N/A

8. Complete name and address of overseas person or business shipping the trophy to you. If you are applying to import a trophy directly from Namibia, you **must** provide the name and address of the professional hunter listed on your Namibian hunting permit [this name will appear on the face of the export permit].

Name:
Business Name:
Address: Collette's,15 Josiah Chinamano Road, Bulawayo Zimbabwe.
City:
State/Province:
Country, Postal Code:

9. For species listed under the Endangered Species Act, please be aware that the U.S. Fish and Wildlife Service must make a finding that your activities will enhance or benefit wild populations of the species involved. While we will communicate with the range country for the species you will hunt or hunted when making the required findings, if you have any information that could support this finding, it would be helpful to our review if you could provide it. Please submit such information on a separate page with your application.

   a. Do you have any information regarding the population status or trend data on the species hunted?

   See attached sheet

   b. In order to hunt, you likely paid for licenses or trophy fees. What were those fees and do you have any information on how those funds were used by either the landowner, community, or government?

   See attached sheet

   c. Do you have information on other funding activities that are being carried out, or were carried out, by the safari outfitter, professional hunter, concession holder, or land owner that provide a conservation benefit to the species being hunted/species hunted?

   See attached sheet

CERTIFICATION STATEMENT (original signature must be provided for either 10 or 11 below)

10. **If you are a broker or taxidermist applying on behalf of a U.S. hunter or foreign national,** provide documentation to show you have a **Power of Attorney** to act on your client's behalf and sign the following statement.

    I acknowledge that the sport-hunted trophy/trophies to be imported has been/will be personally hunted by my client and is being imported only for my client's personal use (i.e., **not for sale, transfer, donation, or exchange that is reasonably likely to result in economic use, gain, or benefit**). I understand that my client may only import two leopard trophies and two elephant trophies within the same calendar year (if applicable). In addition, I have advised my client that raw ivory, once imported into the United States, cannot be re-exported.

    Taxidermist/Broker's signature: _____ Date: _____

11. **If you are the hunter applying to import your own trophy**, please read and sign the following statement.

    I acknowledge that the sport-hunted trophy/trophies to be imported has been/will be personally hunted by me and is being imported only for my personal use (i.e., **not for sale, transfer, donation, or exchange that is reasonably likely to result in economic use, gain, or benefit**). I understand that I may only import two leopard trophies and two elephant trophies within the same calendar year. In addition, I understand that raw ivory, once imported into the United States, cannot be re-exported.

    Applicant's signature: Dwight Miloff Date: 3/8/18

    Be aware that there may be additional permitting or approval requirements by your local or state governments, as well as required by other Federal agencies or foreign government to conduct your propose activity. While the Service will attempt to assist where possible, it is your responsibility to obtain such approval.

All international shipment(s) must be imported through a designated port. A list of designated ports (where an inspector is posted) is available from http://www.fws.gov/le/designated-ports.html. If you wish to use a port not listed, please contact the Office of Law Enforcement for a Designated Port Exemption Permit (form 3-200-2).

9. For species listed under the Endangered Species Act, please be aware that the U.S. Fish and Wildlife Service must make a finding that your activities will enhance or benefit wild populations of the species involved. While we will communicate with the range country for the species you will hunt or hunted when making the required findings, if you have any information that could support this finding, it would be helpful to our review if you could provide it. Please submit such information on a separate page with your application.

.

A. Do you have any information regarding the population status or trend data on the species hunted?

The Matetsi Safari Area Elephant populations are basically overflow populations from two major populations being that of the Greater Hwange Areas and Greater Chobe Areas. Counts from both these populations combined is over 50000 Elephants.

B. In order to hunt, you likely paid for licenses or trophy fees. What were those fees and do you have any information on how those funds were used by the landowner, community, or government?

Funds generated from the Safaris directly work for the whole safari operation. Being employment of Professional Hunters, trackers, skinners, cooks, waiters, camp staff etc., plus also providing employment to National Parks employees as well; in the form of Permits Officers Warden, Game Rangers etc. Indirectly helping with economy of the nearest local town (Victoria Falls) with food, general supplies, fuel etc. all being purchased from here, thus again stimulating the country economy by providing jobs etc. Meat that is harvested from the animals taken also used to help feed the people in the Safari area.

C. Do you have information on other funding activities that are being carried out, or were carried out, by the safari outfitter, professional hunter, concession holder, or land owner that provide a conservation benefit to the species being hunted/species hunted?
Rev.

Funding again generated from safaris also are allocated to anti-poaching activities that not only benefit elephant (although Elephant are always a priority) but other game as well.

African Elephant Status Report 2016

An update from the African Elephant Database

C.R. Thouless, H.T. Dublin, J.J. Blanc, D.P. Skinner, T.E. Daniel, R.D. Taylor, F. Maisels, H. L. Frederick and P. Bouché

Occasional Paper of the IUCN Species Survival Commission No. 60

Zimbabwe

ESTIMATED TOTAL ELEPHANTS

82,630 ± 8,589

GUESSES

1,635 - 1,805

GENERAL STATISTICS

Country Area	390,580 km²
Range Area	81,228 km² (21%)
Protected Range	61 %
Information Quality Index (IQI)	0.86
CITES Appendix	II
Listing Year	1997

CURRENT ISSUES

Poaching of elephants for ivory has escalated in the past ten years and has become a major problem in Zimbabwe. A worrying recent development has been the emergence of poisoning as a poaching technique. Just over 100 elephants were killed in a single cyanide poisoning incident in Hwange National Park in late 2013 (Muboko et al., 2014). The impact of poaching has been highest in the north of the country, particularly in the Sebungwe Region to the south of Lake Kariba, and the Lower Zambezi Region (Dunham et al., 2015c). Although elephant numbers have increased in Gonarezhou National Park, it too experienced an increase in poaching in 2015 (Dunham & van der Westhuizen, 2015).

Concern has been expressed about the impact of high numbers of elephants on vegetation and other biodiversity in Zimbabwe's protected areas. Despite the increase in poaching, this remains a problem in protected areas such as Hwange NP, where the provision of artificial water supplies has led to high elephant densities (ZPWMA, 2015)

Zimbabwe published a national elephant management plan covering the period 2015 to 2020 (ZPWMA, 2015).

In 2008, Zimbabwe undertook an approved one-off sale of 3,764 kg of ivory to Japan and China, at a price of USD $487,162 (Wijnstekers, 2011).

Zimbabwe's annual declared export quota of elephant trophies remains unchanged since 2007 at 1,000 (tusks as hunting trophies from 500 animals) (CITES, n.d.-b). In 2015, the US Fish and Wildlife Service removed its 'non-detriment' finding, thus banning the import of elephant trophies into the USA (USFWS, 2015a).

NUMBERS AND DISTRIBUTION

The estimated number of elephants in areas surveyed in the last ten years in Zimbabwe is 82,630 ± 8,589 at the time of the last survey for each area. There may be an additional 1,635 to 1,805 elephants in areas not systematically surveyed. These guesses likely represent a minimum number, and actual numbers could be higher than those reported. Together, this estimate and guess apply to 78,839 km², which is 97% of the estimated known and possible elephant range. There remains an additional 3% of the estimated range for which no elephant population estimates are available.

There has been a decline of just over 10,000 elephants from surveyed populations since the AESR 2007 and an increase of about 1,000 in guesses, mostly from previously unsurveyed areas in North West Matabeleland. Although there have been large losses from the Sebungwe and Lower Zambezi populations, these have been partially compensated by increases in Gonarezhou and North West Matabeland.

The major populations of the Lower Zambezi Valley (including Mana Pools National Park), Sebungwe (including Matusadona and Chizarira National Parks), North-west Matabeleland (including Hwange and Zambezi National Parks) and the south-east Lowveld (including Gonarezhou NP) were surveyed in 2014 using **aerial sample counts** (including block counts in hilly areas) as part of the Great Elephant Census.

The estimate from the Lower Zambezi Valley in 2014 was 11,656 ± 2,259 (Dunham et al., 2015c). The previous comparable estimate was 19,297 ± 2,527 in 2001 (Mackie, 2002). The 2014 figure replaces an estimate from the AESR 2007 of 19,981 ± 2,392 from 2003 (Dunham, 2004). This survey was less comparable than the 2001 one because it covered a slightly smaller area. There was an approximately 40% decline in the 13 years between 2001 and 2014. The observed carcass ratio of 6% is not as high as one would expect given the rate of population reduction and might suggest that the level of poaching has reduced in recent years. The corridor between the Mavuradonha Wilderness Area and the rest of the Zambezi Valley range has been changed to **possible range** (Packenham quoting Varden, pers. comm., 2016).

The 2014 estimate for Sebungwe was 3,407 ± 1,215 (Dunham et al., 2015b) which replaces an estimate of 15,024 ± 2,133 from a 2006 survey (Dunham et al., 2006a). The observed carcass ratio of 30% indicates an unsustainably high offtake of elephants. There were almost no elephants left in the communal areas, with the main surviving sub-populations in Matusadona and Chizarira National Parks and the Chirisa Safari Area. Wildlife scouts reported 70-100 elephants in Kavira Forest Land at the western end of Sebungwe (M. Sebele pers. comm. in Dunham et al., 2015b).

The 2014 estimate for North-west Matabeleland was 53,991 ± 7,711 (Dunham et al., 2015a), which replaces an estimate of 49,310 ± 7,051 from 2001 (Dunham & Mackie, 2002). There was no significant difference between the totals although the increased carcass ratio of 7% from 3% in 2001 is a worrying sign. Other aerial sample counts were carried out in 2006 and 2007 but they were not

suitable for comparative purposes (Dunham et al., 2007; Dunham et al., 2006b). Since the 2014 Botswana survey was carried out a month earlier than the north-west Matabeleland survey there is a possibility of double-counting or missing animals that had moved from Hwange into Botswana. There was a surprisingly large number of elephants seen in the Ngwasho/Sepako stratum in Botswana adjoining the southern half of Hwange NP (estimate 11,744) (Chase et al., 2015) and evidence from radio-tracking shows that elephants do move out of Hwange into adjoining areas of Botswana (Chamaillé-Jammes, pers. comm., 2016; Ferguson & Chase, 2010).

Elephant range in North-west Matabeleland has probably increased. Water hole counts and scout reports indicated 308 elephants in the Fuller Forest Land, 165 in Gwaai, Bembezi and Umguza Forest Lands (which has been marked as new **known range**) and 150 in Gwampa/Lake Alice Forest Reserves (M. Sebele pers. comm in Dunham et al., 2015a) which are all recorded as **new populations**. I. Du Preez (pers. comm. in Dunham et al., 2015a) reported an **informed guess** of 36 elephants in the privately owned Stanley & Livingstone Game Reserve (Nakavango).

The estimate for Gonarezhou NP from the 2014 survey was 11,120 ± 2,709 (Dunham & van der Westhuizen, 2015). This replaces an estimate of 4,987 ± 1,577 from a comparable 2001 survey. Another survey in 2009 gave an estimate of 9,123 ± 1,898 (Dunham et al., 2010). The elephant population of Gonarezhou NP is continuing to increase, and is at its highest level since surveys started in 1980. There was a relatively low carcass ratio of 4%. There are limited movements of elephants from Gonarezhou into adjoining parts of Mozambique, and one radio-collared elephant moved from Kruger to Gonarezhou (Henley, 2011).

The 2014 survey of the south east Lowveld included some neighbouring areas. No elephants were observed in the Malapati Safari Area immediately south-west of Gonarezhou but there was an estimate of 332 ± 519 in the Mahenye communal land to the north-east of Gonarezhou, which replaces a zero estimate from the 2001 survey. The 2014 survey gave an estimate of 1,585 ± 1,295 for the Savé Valley Conservancy. This replaces an estimate of 527 ± 310 (Dunham, 2003). There is no statistical difference between the two results. Aerial total counts were carried out in 2013 and 2015 (Jooste & Lenton, 2015; Joubert & Joubert, 2013), which did not cover the entire area: 1,538 and 1,490 elephants were counted respectively. Sengwe, further to the south-west, adjoining the northern boundary of Kruger National Park in South Africa, was not counted in the 2014 survey, but there was an estimate of 35 ± 99 in 2013 (Dunham et al., 2013). In the Malilangwe Conservancy 272 elephants were counted using a helicopter in 2013 (Clegg, 2013). This replaces an estimate of 116 from an aerial total count in 2001 (Dunham, 2002). There was an estimate of 55 in 2014 for the Chiredzi River Conservancy (Warth in Dunham & van der Westhuizen, 2015) compared to 28 in 2001 (Dunham, 2002). Although Chipinge Safari Area is marked as possible elephant range, this is now highly unlikely.

There are a number of small isolated populations in other parts of Zimbabwe, which have updated estimates for 2014. There is an informed guess of 150 elephants for Chegutu Safari Area (Mwale, pers. comm. in Dunham, 2015), formerly Hartley Safari Area, west of Harare and this replaces a guess of 100 from 2001 (Dunham & Mackie, 2002). Some 30 elephants reportedly move from the Nyatana Wildlife Management Area in the north east of the country into Mozambique and this replaces a guess of 150 from 2001 (Dunham & Mackie, 2002).

Some 20 bull elephants were photographed, and there was a further unverified report of 40 elephants, near Mangwe Dam in the vicinity of Home Farm and Greystone Ranches, across the border from Francistown in Botswana (Robertson and Winch, pers. comm. in Dunham, 2015) replacing a guess of three from 2002 (Dunham & Mackie, 2002). A helicopter total count enumerated 174 elephants on Shangani Ranch near Bulawayo (Edwards, pers. comm. in Dunham, 2015) and this replaces a guess of 60 from 2001 (Dunham & Mackie, 2002).

There was a **total aerial count** of 212 elephants in 2014 in the Zimbabwe section of the Mapungubwe Transfrontier Conservation Area which includes Tuli Safari Area, Sentinel, Nottingham and River Ranches (Selier & Page, 2015). This replaces an estimate of 82 from 2001 (Dunham & Mackie, 2002).

There were **informed guesses** in 2014 of 500-600 in Bubye Valley (Leathem & English pers. comm. in Dunham, 2015), and 100 on Bubiana Conservancy (Drummond pers. comm. in Dunham, 2015) in the south of Zimbabwe, replacing guesses of 53 and 50 respectively (Dunham & Mackie, 2002). An old estimate of ten elephants in the Mambali Communal Lands on the Botswana border has been retained from the AESR 2007 (Dunham & Mackie, 2002). A report of 54 elephants on Nuanetsi Ranch is recorded as a **new population**.

SUMMARY TOTALS

SURVEY CATEGORY	ESTIMATES FROM SURVEYS		GUESSES		KNOWN AND POSSIBLE RANGE	
	ESTIMATE	± 95% CL	FROM	TO	PERCENT (%)	AREA (km²)
Aerial Total Counts	484	–	–	–	1 %	819
Aerial Sample Counts	82,126	8,589	–	–	81 %	65,502
Informed Guesses	20	–	527	567	5 %	3,777
Other Guesses	–	–	1,091	1,221	10 %	8,399
Degraded Data	–	–	17	17	0 %	342
Totals 2015	**82,630**	**8,589**	**1,635**	**1,805**		
Totals 2006	**93,122**	**7,068**	**534**	**625**		
Assessed Range					97 %	78,839
Unassessed Range					3 %	2,389
Total Range					100 %	81,228

INTERPRETATION OF CHANGES IN ESTIMATES FROM PREVIOUS REPORT

REASON FOR CHANGE	ESTIMATES FROM SURVEYS		GUESSES		KNOWN AND POSSIBLE RANGE	
	ESTIMATE	± 95% CL	FROM	TO	PERCENT (%)	AREA (km²)
Repeat Survey	-10,320	±11,124	0	0	79 %	63,868
New Population	0	0	+713	+713	6 %	4,563
Different Technique	+7	±99	-145	-145	4 %	3,370
Different Area	+20	0	-3	+36	0 %	33
New Guess	-182	0	+519	+559	8 %	6,662
Data Degraded	-17	0	+17	+17	0 %	0
Totals	-10,492	±11,124	+1,101	+1,180	97 %	78,839

AREA OF RANGE COVERED BY EACH DATA CATEGORY

DATA CATEGORY	KNOWN RANGE (km²)	POSSIBLE RANGE (km²)	TOTAL RANGE (km²)
Aerial or Ground Total Counts	819	0	819
Direct Sample and Reliable Dung	65,375	127	65,502
Informed Guesses	3,745	32	3,777
Other Guesses	8,741	0	8,741
Unassessed Range	1,533	857	2,389
Totals	80,213	1,016	81,228

INPUT ZONE	REASON FOR CHANGE	SURVEY DETAILS			# OF ELEPHANTS		SOURCE	PFS	AREA	MAP LOCATION	
		TYPE	RELIAB.	YEAR	ESTIMATE	± 95% CL			(km²)	LON.	LAT.
Chegutu Safari Area	NG	O	E	2014	150		Dunham, 2015	2	445	29.6°E	17.9°S
Greater Mapungubwe											
Tuli, Maramani, Sentinel, Nottingham	RS	AT	A	2014	212		Selier & Page, 2015	2	1,192	29.4°E	22.0°S
Lower Zambezi Valley											
Chewore II	RS	AS	B	2014	594	333	Dunham et al., 2015c	2	1,058	29.9°E	16.1°S
Chewore I & III	RS	AS	B	2014	2,709	851	Dunham et al., 2015c	2	1,773	29.9°E	16.1°S
Chewore IV	RS	AS	B	2014	0		Dunham et al., 2015c	3	472	29.9°E	16.1°S
Doma Safari Area	RS	AS	B	2014	153	194	Dunham et al., 2015c	2	991	29.9°E	16.1°S
Mavuradonha Wilderness Area	RS	AS	B	2014	0		Dunham et al., 2015c	2	652	29.9°E	16.1 S
Mukwiche Area	RS	AS	B	2014	0		Dunham et al., 2015c	3	337	29.9°E	16.1 S
Protea Farm	-	O	E	2001	7		Dunham & Mackie, 2002	4	14	29.6°E	16.5°S
Rest of Zambezi valley	RS	AS	B	2014	8,200	2,029	Dunham et al., 2015c	1	11,720	29.9°E	16.1 S
Mambali Communal Lands	-	AT	E	2001	10		Dunham & Mackie, 2002	2	327	28.4°E	21.5°S
Mangwe Dam	DA	O	D	2014	20	40*	Dunham, 2015	3	291	28.1°E	20.7°S
Northwest Matabeleland											
Fuller Forest Land	NP	O	D	2014	308		Dunham, 2015	3		25.9°E	18.1°S
Gwaai, Bembesi, and Umguza Forest Lands	NP	O	D	2014	165		Dunham, 2015	2	1,442	28.0°E	19.3°S
Gwampa/Lake Alice Forest Lands	NP	O	E	2014	150		Dunham, 2015	2	860	28.5°E	19.1°S
Hwange National Park	RS	AS	B	2014	45,846	6,244	Dunham et al., 2015a	1	15,168	26.4°E	18.8°S
Matabeleland Communal areas	RS	AS	B	2014	2,201	3,062	Dunham et al., 2015a	2	3,075	26.4°E	18.8°S
Matetsi Safari Complex	RS	AS	B	2014	4,843	2,968	Dunham et al., 2015a	1	4,384	26.4°E	18.8°S
Nakavango	NP	O	E	2014	36		Dunham, 2015	3		25.8°E	18.0°S
Ngamo & Sikumi Forest Areas	RS	AS	B	2014	1,101	993	Dunham et al., 2015a	2	2,332	26.4°E	18.8°S
Nyatana Wildlife Management Area	NG	O	E	2014	30		Dunham, 2015	2	651	32.5°E	16.7°S
Sebungwe											
Binga Communal Lands	RS	AS	B	2014	86	162	Dunham et al., 2015b	2	2,201	28.2°E	17.4°S
Chete Safari Area	RS	AS	B	2014	278	222	Dunham et al., 2015b	2	1,242	28.2°E	17.4°S
Chirisa Safari Area	RS	AS	B	2014	1,200	755	Dunham et al., 2015b	2	1,530	28.2°E	17.4°S
Chizarira National Park	RS	AS	B	2014	747	767	Dunham et al., 2015b	2	2,096	28.2°E	17.4°S
Kariba Communal Areas	RS	AS	B	2014	411	364	Dunham et al., 2015b	2	3,198	28.2°E	17.4°S
Kavira Forest Land	NG	O	E	2014	70	30*	Dunham et al., 2015b	2	287	27.0°E	18.1°S
Lusulu	RS	AS	B	2014	0		Dunham et al., 2015b	2	537	28.2°E	17.4°S

INPUT ZONE	REASON FOR CHANGE	SURVEY DETAILS			# OF ELEPHANTS		SOURCE	PFS	AREA	MAP LOCATION	
		TYPE	RELIAB.	YEAR	ESTIMATE	± 95% CL			(km²)	LON.	LAT.
Matusadona National Park	RS	AS	B	2014	669	251	Dunham et al., 2015b	2	1,366	28.2°E	17.4°S
North Gokwe Communal Lands	RS	AS	B	2014	0	21	Dunham et al., 2015b	2	3,096	28.2°E	17.4°S
Sijarira Forest Area	RS	AS	B	2014	16		Dunham et al., 2015b	3	261	28.2°E	17.4°S
Shangani Ranch	NG	O	E	2014	174		Dunham, 2015	2	628	29.3°E	19.6°S
Southeast Lowveld											
Bubiana Conservancy	NG	O	E	2014	100		Dunham, 2015	2	1,772	29.8°E	21.1°S
Bubye Valley Conservancy	NG	O	E	2014	500	100*	Dunham, 2015	1	2,895	30.1°E	21.5°S
Chiredzi River Conservancy	DT	O	E	2014	55		Dunham, 2015	2	895	31.6°E	20.8°S
Gonarezhou National Park	RS	AS	B	2014	11,120	2,709	Dunham & van der Westhuizen, 2015	1	4,941	31.9°E	21.5°S
Mahenye Ward	RS	AS	B	2014	332	519	Dunham & van der Westhuizen, 2015	3	221	31.9°E	21.5°S
Malapati Safari Area	RS	AS	B	2014	0		Dunham & van der Westhuizen, 2015	3	177	31.9°E	21.5°S
Malilangwe Conservancy	RS	AT	A	2013	272		Clegg, 2013	3	425	31.9°E	21.1°S
Matibi II Communal Lands	-	AS	E	1996	0		Davies et al., 1996	3	400	31.7°E	21.5°S
Nuanetsi Ranch	NP	O	D	2014	54		Dunham, 2015	2		30.8°E	21.6°S
Save Valley Conservancy	RS	AS	B	2014	1,585	1,295	Dunham & van der Westhuizen, 2015	2	3,496	32.1°E	20.4°S
Sengwe Communal Land	DT	AS	B	2013	35	99	Dunham et al. 2013	2	2,488	31.8°E	21.6°S

*RANGE OF INFORMED GUESS

KEY TO REASONS FOR CHANGE

DA: Different Area, DD: Data Degraded; DT: Different Technique; NA: New Analysis; NG: New Guess; NP: New population; PL: Population Lost; RS: Repeat Survey (RS denotes a repeat survey that is not statistically comparable for reasons such as different season);
— : No Change

KEY TO SURVEY REPORT

AS: Aerial Sample Count; AT: Aerial Total Count; DC: Dung Count; GD: Genetic Dung Count; GS: Ground Sample Count; GT: Ground Total Count; IG: Informed Guess; IR: Individual Registration; OG: Other Guess. Survey Reliability is keyed A-E (best to worst).

PFS

Priority for Future Surveys (PFS) is ranked from 1 to 5 (highest to lowest). Based on the precision of estimates and the proportion of national range accounted for by the site in question, PFS is a measure of the importance and urgency for future population surveys. All areas of unassessed range have a priority of 1. See Introduction for details on how the PFS is derived.

ABBREVIATIONS AND ACRONYMS

DWIGHT MILOFF
(b) (6) [redacted]
BILLINGS, MT (b) (6)

3/8/18
Date

(b) (6) [redacted]

Pay to the Order of US Fish & Wildlife $ 100 xx/100

ONE Hundred xx/100 Dollars

Photo Safe Deposit™

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www.westernsecuritybank.com

For Ele. ~~OHV~~ Import Permit Dwight Miloff

(b) (6) [redacted]

NOTICE OF REPRESENTATION

This is a notice to the U.S. Fish and Wildlife Service that I have appointed John J. Jackson, III and Regina Lennox of the non-profit firm Conservation Force as my attorneys and legal representatives for all matters concerning my applications for a permit to import a lawfully hunted _Elephant_____ trophy.

This authority is inclusive and extends to all applications and filings, whether administrative or judicial, including but not limited to any request for reconsideration, appeal, and litigation.

I also request that these attorneys, through the address for Conservation Force below, be copied with all correspondence, acknowledgements, notices and decisions concerning my application to import my trophy at the following address:

Conservation Force
3240 S. I-10 Service Road W., Suite 200
Metairie, Louisiana 70001 USA
T: (504) 837-1233
F: (504) 837-1145
E: cf@conservationforce.org

Signed: _____

Name: Mark Saulsbury

Date: 03-05-2018

Department of the Interior
U.S. Fish and Wildlife Service

OMB No 1018-0164
Expires 11/30/2016

Federal Fish and Wildlife Permit Application Form

MAR 2 3 2018

Return to: U.S. Fish and Wildlife Service
Division of Management Authority (DMA)
Branch of Permits, MS: IA
5275 Leesburg Pike
Falls Church, VA 22041-3803
1-800-358-2104 or 703-358-2104

Type of Activity:
Import of Sport-hunted Trophies of
Southern African Leopard, African Elephant, and
Namibian Southern White Rhinoceros

Complete Sections A or B, and C, D, and E of this application. U.S. address may be required in Section C, see instructions for details.
See attached instruction pages for information on how to make your application complete and help avoid unnecessary delays.

A. Complete if applying as an individual

1.a. Last name	1.b. First name	1.c. Middle name or initial	1.d. Suffix
Saulsbury	Mark	(b) (6)	

2. Date of birth (mm/dd/yyyy)	3. Occupation	4. Affiliation/ Doing business as (see instructions)
(b) (6)		N/A

5.a. Telephone number	5.b. Alternate telephone number	5.c. Fax number	5.d. E-mail address
(b) (6)			(b) (6)

B. Complete if applying on behalf of a business, corporation, public agency, Tribe, or institution

1.a. Name of business, agency, Tribe, or institution	1.b. Doing business as (dba)
N/A	

2. Tax identification no	3. Description of business, agency, Tribe, or institution

4.a. Principal officer Last name	4.b. Principal officer First name	4.c. Principal officer Middle name/ initial	4.d. Suffix

5. Principal officer title	6. Primary contact name

7.a. Business telephone number	7.b. Alternate telephone number	7.c. Business fax number	7.d. Business e-mail address

C. All applicants complete address information

1.a. Physical address (Street address, Apartment #, Suite #, or Room #, no P.O. Boxes)
(b) (6)

1.b. City	1.c. State	1.d. Zip code/Postal code	1.e. County/Province	1.f. Country
Odessa	Texas	(b) (6)		USA

2.a. Mailing Address (include if different than physical address, include name of contact person if applicable)

2.b. City	2.c. State	2.d. Zip code/Postal code	2.e. County/Province	2.f. Country

D. All applicants MUST complete

1. Attach check or money order payable to the U.S. FISH AND WILDLIFE SERVICE **in the amount of $100, nonrefundable processing fee**. Federal, Tribal, State, and local government agencies, and those acting on behalf of such agencies, are exempt from the processing fee – ***attach documentation of fee exempt status as outlined in instructions.*** (50 CFR 13.11(d))

2. Do you currently have or have you ever had any Federal Fish and Wildlife permits?
Yes ☐ If yes, list the number of the most current permit you have held or that you are applying to renew/re-issue: unknown No ☑

3. Certification: I hereby certify that I have read and am familiar with the regulations contained in ***Title 50, Part 13 of the Code of Federal Regulations*** and the other ***applicable parts in subchapter B of Chapter I of Title 50***, and I certify that the information submitted in this application for a permit is complete and accurate to the best of my knowledge and belief. I understand that any false statement herein may subject me to the criminal penalties of 18 U.S.C. 1001.

Mark Saulsbury — 03/05/2018
Signature of applicant/person responsible for permit (No photocopied or stamped signatures) — Date of signature (mm/dd/yyyy)

Please continue to next page

E. IMPORT OF SPORT-HUNTED TROPHIES OF SOUTHERN AFRICAN LEOPARD, AFRICAN ELEPHANT, AND NAMIBIAN SOUTHERN WHITE RHINOCEROS

Note 1: If you hold an import permit for a trophy/trophies that you did not use, please **return the unused original permit.** If you are requesting reissuance of a permit because you have taken a trophy, but were unable to import it prior to the expiration of the permit, please use the renewal form (3-200-52; http://www.fws.gov/international/permits/by-form-number/index.html) and return your original permit with that form.

Note 2: *Sport-hunted trophy* is defined at 50 CFR 23.74 as follows: *Sport-hunted trophy* means a whole dead animal or a readily recognizable part or derivative of an animal specifically identified on the accompanying CITES document that meets the following criteria:

(1) Is raw, processed, or manufactured;
(2) Was legally obtained by the hunter through hunting for his or her personal use;
(3) Is being imported, exported, or re-exported by or on behalf of the hunter as part of the transfer from its country of origin ultimately to the hunter's country of usual residence; and
(4) Includes worked, manufactured, or handicraft items made from the sport-hunted animal only when:
  (i) Such items are contained in the same shipment as raw or tanned parts of the sport-hunted animal and are for the personal use of the hunter;
  (ii) The quantity of such items is no more than could reasonably be expected given the number of animals taken by the hunter as shown on the license or other documentation of the authorized hunt accompanying the shipment; and
  (iii) The accompanying CITES documents (export document and, if appropriate, import permit) contain a complete itemization and description of all items included in the shipment.

Note 3: Certain hunting trophies, including leopard, elephant, and rhinoceros hunting trophies, are subject to restrictions on their use after import into the United States. Please see 50 CFR 23.55 for more information or contact the Division of Management Authority.

Please provide the following information. Complete all questions on the application. Mark questions that are not applicable with "N/A". If applying for more than one trophy, be sure to answer questions 2 and 3 for each trophy.

If importing trophies from more than one country, you must submit a separate application for each shipment in order to obtain separate import permits.

1. ENTER the quantity next to the name of the species you are applying to import (you may apply to import specimens of more than one species provided they have been/are being hunted in the same country):

Leopard (*Panthera pardus*) Quantity: N/A (Import is limited to two per hunter per calendar year)

African elephant (*Loxodonta africana*) Quantity: 1 (Import is limited to two per hunter per calendar year)
Note: once imported, ivory cannot be re-exported.

Southern white rhinoceros (*Ceratotherium simum simum*) from Namibia Quantity: N/A (An import permit is not required for trophies harvested in South Africa or Swaziland. If you wish to import from a different country, please use form 3-200-37).

2. **IF ANIMAL IS CURRENTLY LIVING IN THE WILD**, please enter the following:
   a. Country and place (area, region, GIS coordinates, ranch AND nearest city) where wildlife is to be taken from the wild:

   b. Date wildlife is to be hunted:

c. Description of the trophy and parts you intend to import (e.g., skin, skull, shoulder mount, life size mount, claws, horns, tusks).

3. **IF THE ANIMAL IS DEAD**, please enter the following:
   a. Country and place (area, region, GIS coordinates, ranch, and/or AND nearest city) where trophy was removed from the wild: Namibia, Nyae-Nyae Conservancy, OTJOZONDJUPA Region, Nearest Town: Tsumkwe

   b. Date wildlife was hunted: August 8, 2017

   c. Description of the trophy and parts you intend to import (e.g., skin, skull, shoulder mount, life size mount, claws, horn, tusks):

      2 Tusks, 2 Ears, Cape, 2 Skin Panels, 1 Tail

   d. The current location of the trophy (address and country) [the U.S. import permit will identify this country as the country of export/re-export and must match with the export/re-export document]:

      International Air Cargo Services, Unit No. 10, Northern Industrial Park, Newcastle Street, Windhoek Namibia

4. Complete name and address of overseas person or business shipping the trophy to you. If you are applying to import a trophy directly from Namibia, you **must** provide the name and address of the professional hunter listed on your Namibian hunting permit [this name will appear on the face of the export permit].

Name: Business Name:	S.M. Jacobs SMJ Safaris
Address:	P.O. Box 601
City:	Grootfontein
State/Province:	Namibia
Country, Postal Code:	

5. Please be aware that the U.S. Fish and Wildlife Service may need to make a finding that your activities will enhance or benefit wild populations of the species involved. If you have any information that could support this finding (e.g., how the funds from license/trophy fees will be spent, what portion of the hunting fee will support conservation), please submit such information on a separate page with your application.

Please see current enhancement finding for Namibia.

CERTIFICATION STATEMENT (original signature must be provided for either 6 or 7 below)

6. **If you are a broker or taxidermist applying on behalf of a foreign national,** provide documentation to show you have a **Power of Attorney** to act on your client's behalf and sign the following statement.

   I acknowledge that the sport-hunted trophy/trophies to be imported has been/will be personally hunted by my client and is being imported only for my client's personal use (i.e., **not for sale, transfer, donation, or exchange that is reasonably likely to result in economic use, gain, or benefit**). I understand that my client may only import two leopard trophies in one calendar year. I understand that my client may only import two African elephant trophies in one calendar year. In addition, I have advised my client that raw ivory, once imported into the United States, cannot be re-exported.

   Taxidermist/Broker's signature: N/A Date: _____

7. **If you are the hunter applying to import your own trophy**, please read and sign the following statement.

I acknowledge that the sport-hunted trophy/trophies to be imported has been/will be personally hunted by me and is being imported only for my personal use (i.e., **not for sale, transfer, donation, or exchange that is reasonably likely to result in economic use, gain, or benefit**). I understand that I may only import two leopard trophies in one calendar year. I understand that I may only import two African elephant trophies in one calendar year. In addition, I understand that raw ivory, once imported into the United States, cannot be re-exported.

Applicant's signature: _____ Date: 3-5-18

Be aware that there may be additional permitting or approval requirements by your local or state governments, as well as required by other Federal agencies or foreign government to conduct your propose activity. While the Service will attempt to assist where possible, it is your responsibility to obtain such approval.

8. All international shipment(s) must be through a designated port. A list of designated ports (where an inspector is posted) is available from http://www.fws.gov/le/designated-ports.html. If you wish to use a port not listed, please contact the Office of Law Enforcement for a Designated Port Exemption Permit (form 3-200-2).

9. Name and address where you wish the permit to be mailed, **if** different from page 1 (All permits will be mailed via the U.S. Postal Service, unless you identify an alternative means below):

10. If you wish the permit to be delivered by means other than USPS regular mail, provide an air bill, pre-paid envelope, or billing information. If you do not have a pre-paid envelope or air bill and wish to pay for a courier service with your credit card, please check the box below. Please DO NOT include credit card number or other information; you will be contacted for this information.

☑ If a permit is issued, please send it via a courier service to the address on page 1 or question 9. I understand that you will contact me for my credit card information once the application has been processed.

11. Who should we contact if we have questions about the application? (Include name, phone number, and email):

Conservation Force, 504-837-1233, cf@conservationforce.org

12. **Disqualification Factor**. A conviction, or entry of a plea of guilty or nolo contendere, for a felony violation of the Lacey Act, the Migratory Bird Treaty Act, or the Bald and Golden Eagle Protection Act disqualifies any such person from receiving or exercising the privileges of a permit, unless such disqualification has been expressly waived by the Service Director in response to a written petition. (50 CFR 13.21(c)) Have you or any of the owners of the business, if applying as a business, been convicted, or entered a plea of guilty or nolo contendere, forfeited collateral, or are currently under charges for any violations of the laws mentioned above?

☐ Yes ☑ No If you answered "Yes" provide: a) the individual's name, b) date of charge, c) charge(s), d) location of incident, e) court, and f) action taken for each violation.

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

PERMIT / CERTIFICATE No.

X EXPORT

RE-EXPORT

IMPORT

OTHER:

0055547

Original

2 Valid until

3 Importer (name and address)

(b) (6)

3a Country of import

4 Exporter / Re-exporter (name address and country)

Signature of the applicant

5 Special conditions

Trophies first certified by the Namibian customs
Certificate No A 17 0033 52 15 & No 17 0034 34 25

All imports and exports remain subject to veterinary regulations
For live animals, this permit or certificate is only valid if the transport conditions conform to the Guidelines for Transport of Live Animals or, in the case of air transport, to the IATA Live Animals Regulations

6. Name address national seal/ stamp and country of Management Authority

MINISTRY OF ENVIROMENT AND TOURISM
Directorate Scientific Services
Private Bag 13306
Windhoek
NAMIBIA

5a. Purpose of the transaction (see reverse)

5b. Security stamp No

	7./8 SCIENTIFIC NAME (genus and species) AND COMMON NAME OF ANIMAL OR PLANT	9. Description of specimens including identifying marks or numbers (age /sex if live)	10 Appendix No and source (see reverse)	11 Quantity (including unit)	11a Total exported Quota
A	7./8 Loxodonta africana African elephant	9. 2x Tusks	10	11 2 tusk	11a
B	7./8. Loxodonta africana African elephant	9. 2x ears, tail, 2 front panels & tail	10	11 Siter	11a
C	7./8	9	10	11	11a
D	7./8	9	10	11	11a

	12 Country of origin *	Permit No	Date	12a Country of last re-export	Certificate No	Date	12b. No. of the operation ** or date of acquisition ***
A							
B							
C							
D							

* Country in which the specimens were taken from the wild, bred in captivity or artificially propagated (only in case of re-export)
** Only for specimens of Appendix-I species bred in captivity or artificially progated for commercial purposes
*** for pre-Convention specimens

MINISTRY OF ENVIRONMENT AND TOURISM REPUBLIC OF NAMIBIA

13 THIS PERMIT IS ISSUED BY

Place

Date

28 FEB 2019

Security stamp, signature and official seal

14 EXPORT ENDORSEMENT

15. Bill of Landing / Air Waybill Number

Block	Quantity
A	
B	
C	
D	

Port of Export / Re-export

Date

Signature

Official stamp and title

Original

Namprint 2108

MINISTRY OF ENVIRONMENT AND TOURISM

Directorate Scientific Services
Private Bag 13306
Windhoek, Namibia
Enquiries: Chief Warden
Permit Office

Tel +264-61-284 2111
Fax +264-61-258 861

PERMIT No.:	173572
VALID FROM:	01.08.17
VALID TO:	14.08.17

PERMIT TO HUNT FOR TROPHIES

Permission is hereby granted in terms of the Nature Conservation Ordinance 1975 (Ord. 4 of 1975)

Name of Trophy Hunter: M. (b)(6) Saulsbary

Residential Address:

Country: U.S.A

to hunt the specified number of game for the sake of trophies.

CITES Indicates species listed on CITES Appendix I or II

	SPECIES: COMMON NAME	Number
	Buffalo	
CITES I	Crocodile	/
	Dik-dik	/
	Eland	1X
CITES II	Elephant	1X
	Giraffe	1X
	Grey Duiker	1X
CITES II	Hippopotamus	/
	Impala, Black-faced	/
	Impala, common	/
	Klipspringer	/
	Kudu	1X
CITES II	Lechwe	/
	Oryx (Gemsbok)	1X
	Ostrich	1X
	Red hartebeest	1X
	Reedbuck	/
CITES I	Rhinoceros, black	/
CITES I	Rhinoceros, white	/
	Roan	1X
	Sable	/
	Springbok	/

	SPECIES: COMMON NAME	Number
	Steenbok	1X
	Warthog	1X
	Waterbuck	/
	Wildebeest, blue	
	Zebra, Burchell's	
CITES II	Zebra, Hartman's mountain	
	Blesbok	
	Wildebeest, black	
CITES I	Cheetah	
CITES I	Leopard	
CITES II	Lion	
	Other	
	*Please report back within 48hrs after hunt	
	*No trophy hunting to be advertised on internet	

on the following farms / hunting concessions: Nyae - Nyae Conservancy

Guided by (name of guides): S.M Jacobs

Cashier receipt No.: 2145667

Issued on 27.07.17

Amount received: N$

Authorizing officer

IMPORTANT: This permit is not valid if altered in any way.

Official MET date stamp

2017 -07- 27

173 S72

The following certificate must be completed immediately after each animal that has been hunted (please print) Reported R. Jansen 14/8/17

Date	Species	LH*	RH*	LB*	RB*	Total	RW*	Age	Male Female	Farm		Farm owner	Hunter	Professional hunter Master hunting guide Hunting guide
										Name	No			
8/8/17	Elephant.		34,5kg		32,5kg					Nyae-Nyae Conservancy.				
10/8/17	Roan.	68	59	24,	24	175		1	M	Nyae-Nyae Conservancy				
11/8/17	Oryx.	87	88	20	20	215		1	M	Nyae-Nyae Conservancy				

*L=Left, R=Right, H=Horn, B=Base, RW=Rowland Ward

No trophy hunter may hunt unless accompanied by a professional hunter,, master hunting guide or hunting guide.

This permit must be kept on the person of the permit-holder at all times while hunting.

Only guide(s) as specified on the permit ma conduct the hunt.

Namibian Association of CBNRM Support Organisations

NACSO connects the communities and organisations that manage and conserve Namibia's natural resources

19 Lossen Street
PO Box 98353
Windhoek
Namibia

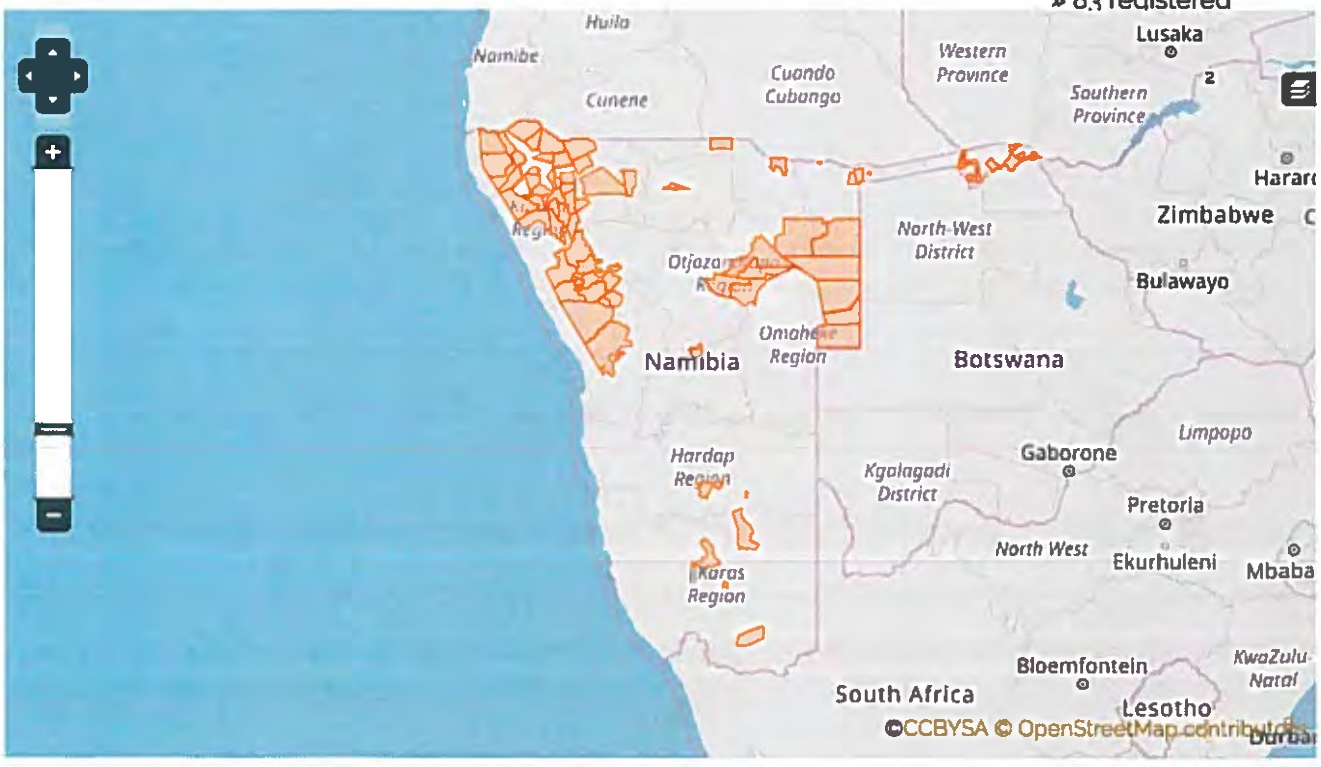
Tel: +264 61 230888
Fax: +264 61 237036
nacso@iway.na

Share / Save

Registered Communal Conservancies

Vital statistics

» 83 registered



Quick links

Ministry of Environment and Tourism (MET) website

MET regional offices

Photo Library

North West game count

NACSO full members

OAT

SRT

CCF

NNDFN

MRCC-UNAM

» See all NACSO members

NACSO partners

Funding partners

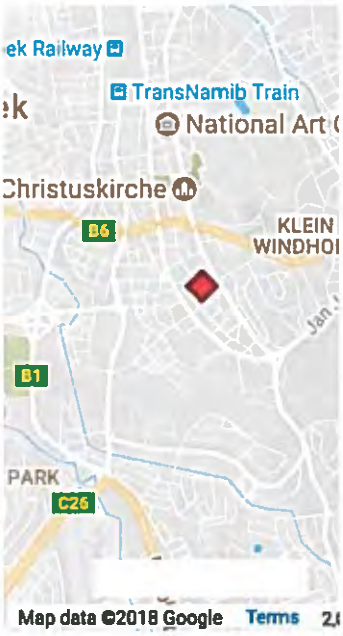
Hunting partners

Tourism partners

Government Agencies

Where we are

Location of...



Website by JARO Consultancy

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Namibian Association of CBNRM Support Organisations

NACSO connects the communities and organisations that manage and conserve Namibia's natural resources

19 Lossen Street
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Nyae Nyae Conservancy

Meaning 'place without mountains, but rocky'

Quick facts

Registered:	February 1998
Region:	Otjozondjupa
Area:	8,992 km²
Approximate population:	2,785
Geographical features:	

Quick links

Ministry of Environment and Tourism (MET) website

MET regional offices

Photo Library

NACSO full members

OAT

SRT

CCF

IRDNC

LAC

NDT

NNF

NNDFN

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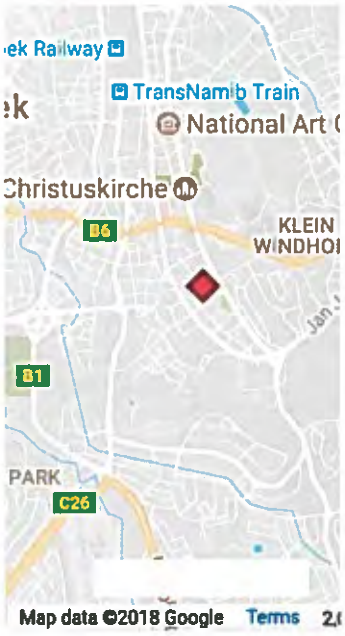

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Contributed Paper

Complementary benefits of tourism and hunting to communal conservancies in Namibia

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Abstract: *Tourism and hunting both generate substantial revenues for communities and private operators in Africa, but few studies have quantitatively examined the trade-offs and synergies that may result from these two activities. We evaluated financial and in-kind benefit streams from tourism and hunting on 77 communal conservancies in Namibia from 1998 to 2013, where community-based wildlife conservation has been promoted as a land-use that complements traditional subsistence agriculture. We used data collected annually for all communal conservancies to characterize whether benefits were derived from hunting or tourism. We classified these benefits into 3 broad classes and examined how benefits flowed to stakeholders within communities under the status quo and under a simulated ban on hunting. Across all conservancies, total benefits from hunting and tourism increased at roughly the same rate, although conservancies typically started generating benefits from hunting within 3 years of formation as opposed to after 6 years for tourism. Disaggregation of data revealed that the main benefits from hunting were income for conservancy management and food in the form of meat for the community at large. The majority of tourism benefits were salaried jobs at lodges. A simulated ban on trophy hunting significantly reduced the number of conservancies that could cover their operating costs, whereas eliminating income from tourism did not have as severe an effect. Given that the benefits generated from hunting and tourism typically begin at different times in a conservancy's life-span (earlier vs. later, respectively) and flow to different segments of local communities, these 2 activities together may provide the greatest incentives for conservation on communal lands in Namibia. A singular focus on either hunting or tourism would reduce the value of wildlife as a competitive land-use option and have grave repercussions for the viability of community-based conservation efforts in Namibia, and possibly other parts of Africa.*

Keywords: communal lands, community-based conservation, financial benefits, hunting ban, in-kind benefits, stakeholders

Resumen: *El turismo y la caza generan ingresos públicos sustanciales para las comunidades y los operadores privados en África, pero pocos estudios han examinado cuantitativamente las compensaciones y las sinergias que pueden resultar de estas dos actividades. Evaluamos las oleadas de beneficios financieros y de pago en especie provenientes del turismo y la caza en 77 zonas de conservación comunal en Namibia desde 1998 a 2013, donde la conservación de vida silvestre basada en la comunidad ha sido promovida como un uso de suelo que complementa la agricultura tradicional de subsistencia. Usamos datos colectados anualmente de todas las zonas comunales para caracterizar si los beneficios se derivaron de la caza o el turismo. Clasificamos estos beneficios en tres categorías generales y examinamos cómo los beneficios fluyeron hacia los accionistas dentro de las comunidades bajo el status quo y bajo una prohibición simulada de la caza. En todas las zonas de conservación comunal, los beneficios totales de la caza y el turismo incrementaron aproximadamente a la misma tasa, aunque en estas zonas se comenzaron a generar beneficios de la caza normalmente dentro de los 3 años de formación, en contraste con del turismo que se generaron después de 6 años. La desagregación de los datos reveló que los principales beneficios de la caza fueron los ingresos para*

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are not monolithic entities; rather, they are composed of different groups of people who will experience different costs and benefits from wildlife conservation (Agrawal & Gibson 1999; Roe et al. 2009). For example, wealthy cattle owners and poor subsistence farmers will have different perceptions of wildlife conservation given the particular costs and benefits they are likely to experience. Diversifying benefit streams from wildlife conservation so that the variety of stakeholders within local communities are incentivized to promote or at minimum tolerate living with wildlife will provide the greatest likelihood that conservation as a land use will ultimately prove more attractive than wildlife-unfriendly alternatives. Because communal lands comprise a large fraction of rural Africa (up to 500% more than state-managed forest reserves and national parks [Alden Wily 2011]), management of these lands will play a huge role in determining the success or failure of biodiversity conservation efforts across the continent.

We focused on how different types of benefits provided by wildlife vary over time, space, and community stakeholder groups in communal conservancies in Namibia. Namibia's Community-Based Natural Resource Management (CBNRM) program began in the mid-1990s, when progressive legislation for the devolution of conditional rights to natural resources allowed communities to register areas of customary landholding as "communal conservancies." Registering these conservancies (involving developing zoning and sustainable resource management plans and a constitution) allows local communities to manage and benefit from wildlife and other natural resources on their traditional lands. Prior to the legislation, natural resources were the sole property of the state. Although wildlife has been used by people for millennia in the region that is now Namibia, the last century was characterized by declines in various species, starting with the rinderpest outbreak at the end of the 19th century, followed by overhunting of big game species by colonial hunters, and more recently by a major drought combined with a poaching increase in the 1980s (Owen-Smith 2010). Namibia's CBNRM program is widely recognized as having contributed to a strong recovery of wildlife in large parts of the country, through the creation of social and economic incentives for the sustainable coexistence of wildlife and people on communal lands (Owen-Smith 2010; Naidoo et al. 2011*b*; NACSO 2013). Additionally, the principles used to incentivize communities to steward wildlife across very large spatial scales are already being adopted by numerous other countries in Africa and beyond (NACSO 2013). We examined how changes in benefits over time generated on communal conservancies in Namibia vary according to whether they were derived from tourism or hunting (the 2 most significant benefits derived from wildlife). We also assessed how these benefits flow to different stakeholders within local communities and how factors such as time of establishment and changes in resource management policies affect such benefit flows on communal lands.

Methods

We used data from 77 communal conservancies registered by 2012 in Namibia to examine benefit flows associated with hunting and photographic tourism. The first four of these conservancies were established in 1998, and we used data through the 2013 calendar year for all of them. For both hunting and tourism, conservancies negotiate agreements with private operators. The agreements between conservancies and operators specify the portion of income the conservancy receives (typically 8–12% of total lodge revenue and from 30–75% of trophy price, depending on the species) and jobs to be offered to community members with the operation (from 20–50 for tourism lodges, depending on factors such as size and location, and 8–10 for hunting camps). In addition, community members hunt for subsistence and allow local sales of meat from wildlife through game cropping. Information on fees paid to conservancy management committees; salaries of community members employed in the tourism or hunting industry; and nonfinancial benefits (primarily meat from hunting, but also meals, training, human-wildlife conflict compensation, and other donations to the community at large) is compiled annually by every conservancy. Financial reporting of conservancies is supported by various nongovernmental organizations, is ground-truthed, and is double-checked against analogous reports from tourism and hunting operators.

We used these data and categorized each source of benefit as to whether it was derived from tourism or from hunting. The CBNRM program uses the price of buying alternative meat as the value of wild meat distributed from animals that were hunted (replacement-cost shadow price approach). In 2013, it was 18 Namibian dollars/kg of meat (NACSO 2013). This shadow price can vary and is adjusted from year to year to reflect supply and demand, but the same rate is applied across the country in order to maintain comparability of meat benefits generated in different regions. We used a consumer price index produced by the Bank of Namibia to standardize benefit figures from all years into constant 2013 Namibian dollars. We subsequently expressed all figures in 2013 U.S. dollars (U.S.$) based on the average monthly exchange rate in 2013 of U.S.$1 = N$9.64.

We divided benefits into the 3 classes (described above) because each represented a different type of gain that is channeled to different parts of a conservancy and has different implications for the sustainability of the conservancy and for its livelihood value to members. Income (i.e., fees from lodge and hunting concessions) to management committees is used by conservancies to cover operational and management costs

these financial time series by calculating 4 metrics per conservancy: temporal trend (slope from a linear regression of benefits on year); volatility (root mean square error from the linear regression); end point (magnitude of benefits in 2013); and lag time between year conservancy registered and year the first benefits were generated.

We used t tests on these metrics to assess whether temporal flows of benefits to conservancies were significantly different between hunting and tourism.

Results

Of the 77 conservancies established by 2012, 25 reported not generating any benefits from either hunting or tourism. Considering all conservancies in Namibia's CBNRM program, aggregate benefits increased over time (Fig. 1). Total benefits from tourism and hunting were similar in the early years of the program, but tourism benefits exceeded those from hunting from 2003 to 2010, whereas from 2011 to 2013 the benefits from hunting were greater than tourism benefits (Fig. 1a). Although fee payments to conservancies and nonfinancial benefits (primarily meat) from hunting accumulated at higher levels than those from tourism (Figs. 1b and d), total salaries from tourism enterprise jobs increased 10 times faster than salaries from hunting jobs (Fig. 1c). Nonfinancial benefits from tourism dropped sharply from 2011–2013 relative to continued increasing nonfinancial benefits from hunting (Fig. 1d), a result that may have coincided with the worldwide economic downturn in 2008 and fewer available resources for tourism companies to make additional contributions to conservancies.

Conservancies were formed in roughly 4 cohorts that coincided with (1) initial heavy donor investment (1998–2001, 15 conservancies), (2) a period of declining donor investment (2003–2005, 29 conservancies), (3) an upturn in investment peaking in 2009 (2006–2009, 15 conservancies), and (4) a further increased-investment phase (2011–2013, including 18 conservancies registered by the end of 2012). The earliest conservancies, in cohort 1, had similar levels of total benefits for the first 6 years after registration, after which benefits from both hunting and tourism continued to increase but at a faster rate for tourism (Fig. 2a). Conservancies in cohort 2 (Fig. 2b) had roughly similar rates of growth in total benefits from tourism and hunting, whereas cohorts 3 (Fig. 2c) and 4 (Fig. 2d) earned virtually no benefits from tourism and had either moderate (cohort 3) or low (cohort 4) benefits from hunting.

Disaggregating the national-level data revealed that pathways for generating benefits over time varied substantially among conservancies (Supporting Information). Of the 52 conservancies that derived some level of benefits from wildlife, 28 derived all or almost all of their total benefits from hunting, 6 derived all or almost all benefits from tourism, and 18 had substantial levels of benefits from both hunting and tourism.

Although there was a tendency for the total benefits from tourism to be higher than those from hunting, there were no significant differences for any of the conservancy time series metrics (Table 1). The only exception to this was the lag time between conservation formation and the beginning of benefits generation. After their formation, conservancies derived benefits from hunting approximately twice as quickly as they derived benefits from tourism (Table 1). On average, conservancies started generating benefits from hunting about 3 years after their formation, whereas it took 6 years, on average, after conservancy formation to start generating benefits from tourism.

In addition to temporal and spatial differentiation, there were differences in how benefits from tourism and trophy hunting flowed to the different constituencies contained within communal conservancies (Fig. 3). Based on detailed financial accounting data from 2011–2013, 58.3% of the financial benefits from tourism were in the form of jobs to conservancy members at joint-venture lodges, whereas 30.3% of the benefits were lodge contractual fees used for conservancy management and 11.5% were nonfinancial benefits to the community at large less.

In contrast, the majority (64.3%) of the benefits from hunting were in the form of cash for the operation of the conservancy, and a substantial fraction went to the community at large in the form of meat from hunted animals (32.0%, or approximately 1.4 million kg over the 3 years). Conservancies used income from trophy hunting and tourism in a variety of ways that benefited the entire community (Fig. 3), most importantly for the salaries of conservancy employees and for other conservancy operating costs, but also for compensation for wildlife conflict, payments to traditional authority structures, direct cash dividends, community-level projects, and infrastructure development. Our data suggest that operational costs, conservancy employee salaries, and the various benefits to the community at large were mostly derived from hunting because hunting operators paid fees from 2011–2013 of $5.41 million (72% of the total), whereas tourism operators paid $2.13 million (28%).

Currently, many conservancies cover their operating costs with income derived from trophy hunting and from tourism that is directed to conservancy management. Simulation of a trophy hunting ban showed a reduction in the number of conservancies with incomes greater than operating costs in 2013, from 74% (37 of 50) under the status quo to 16% (8 of 50) when conservancy income from hunting was eliminated. If this reduction were to occur throughout the country, it would cover nearly 50,000 km^2 (Fig. 4). When conservancy income from tourism was removed, the effect was again negative but

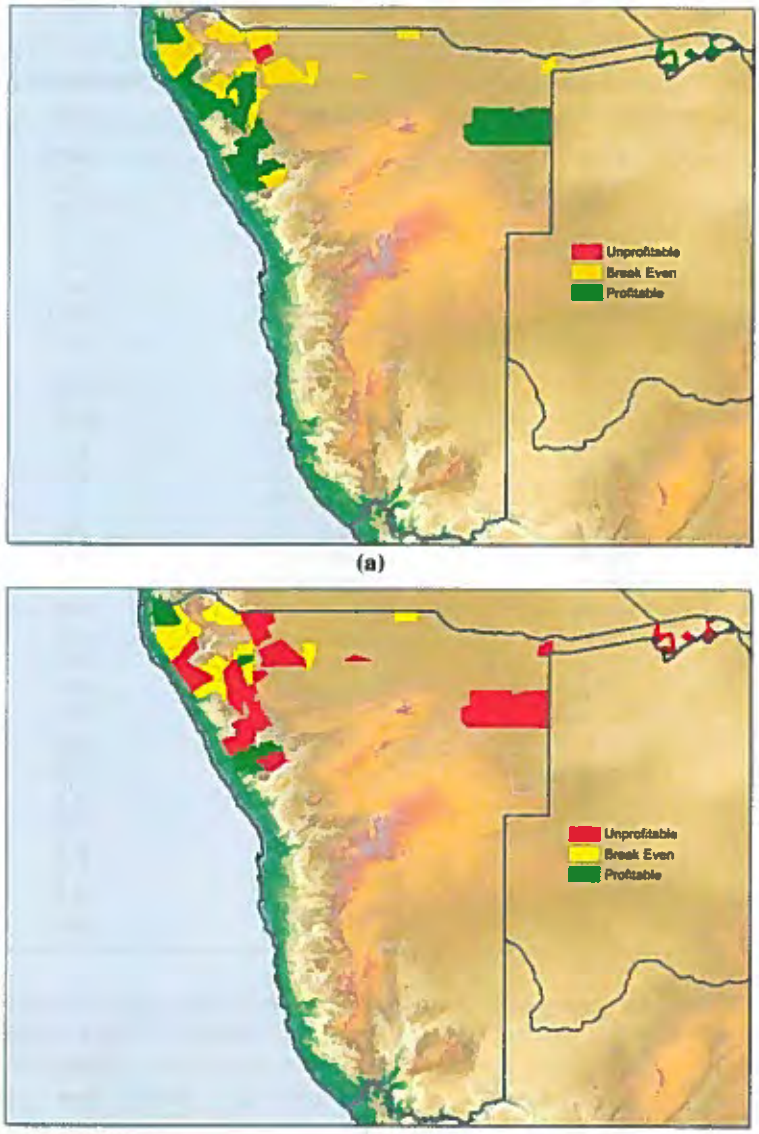

Figure 4. Revenues minus operating costs for 50 communal conservancies for which detailed management cost data were available in 2013 under (a) the status quo and (b) a simulated trophy hunting ban. Break-even conservancies indicate those for which revenues and operating costs are within $5000 of one another.

less marked; 59% of conservancies remained able to cover their operating costs.

Finally, of the 303 animals harvested by trophy hunters in 2013, individuals from 2 of the Big-5 (buffalo [*Syncerus caffer*], elephant [*Loxodonta africana*], lion [*Panthera leo*], leopard [*Panthera pardus*], rhinoceros [*Diceros bicornis* and *Ceratotherium simum*) species hunted in Africa, buffalo and elephant, accounted for 78.3% of hunting revenue; over 55% was attributable just to elephants (Table 2).

Discussion

Despite the importance of both tourism and hunting to conservation, and the debate surrounding their implementation, we are the first study to use detailed quantitative data across multiple jurisdictions and over a lengthy time span to directly compare the financial performance of these two activities. Our data from 77 Namibian conservancies from 1998 to 2013 showed that trophy hunting and tourism reached similar aggregate levels but began to generate benefits at different times (earlier vs. later in a conservancy's life-span) and flowed to different beneficiaries (community management committees and the community at large vs. individual employees). Previous work in Namibia has demonstrated that benefits from hunting and tourism are also spatially differentiated; conservancies are more likely to generate benefits from hunting in areas with diverse wildlife and Big-5 species, whereas the presence of black rhinoceros (*Diceros bicornis*) and broader environmental conditions (distance to tourist routes, topographical diversity, and rainfall) are correlated with higher benefits from tourism (Naidoo et al. 2011*b*). In addition, the first conservancies established were typically those with the highest potential to

where nature-based tourism is not viable (e.g., Blom 2004).

Benefits from trophy hunting and tourism also accrue to different stakeholders within communal conservancies. Benefits from tourism were mainly in the form of employment income to conservancy members who are hired to work at lodges built on conservancy land. Although these employees normally come from among a group of conservancy members nominated by the conservancy, ultimately staff are hired based on their knowledge, communication skills, and potential. Jobs of any kind are extremely rare in remote rural areas and thus highly sought after; therefore, tourism is viewed very favorably by local residents who are employed in the industry (Suich 2010; Silva & Motzer 2015). In contrast, agreements between communities and hunting operators provide significantly higher levels of income for conservancy management, as well as greater nonfinancial benefits (largely from meat) distributed directly to the community at large.

The income to management committees is essential; without it, most communal conservancies in Namibia would be unable to cover their operating costs (which three-quarters of the 50 conservancies we assessed were doing). Conservancies unable to cover their operating costs will likely cease to pursue conservation as a viable land use because without conservancy income, game guards cannot be paid, management and monitoring plans cannot be developed and instituted, the sense of local ownership over natural resources dissipates, and wildlife becomes much more vulnerable to declines from poaching and overharvest. This link between income from hunting and the conditions and incentives that permit wildlife to persist as an economically viable land use is critical but often unrecognized. Our data also show that almost 80% of hunting benefits are delivered by two species (elephant and buffalo); elephants alone generate over 50% of all hunting benefits from an increasing population base (7500 individuals in 1995 to over 20,000 in 2012 [Craig 1999; Ministry of Environment and Tourism 2012]). Therefore, even a targeted hunting ban on elephants or an import ban such as those that currently prevent the import of elephant trophies from Tanzania and Zimbabwe into the United States is likely to have a very negative impact on Namibia's CBNRM program by severely undermining conservancy governance structures and incentives for conservation. Anecdotal accounts of the impact of Botswana's 2014 hunting ban suggests that similar negative consequences (an increase in poaching for meat and trade and increased collaboration of local communities with international poaching gangs) may be occurring there (Somerville 2015).

Although we found there were impressive financial gains from trophy hunting, the sustainability (both ecological and economic) of these operations on communal lands in Namibia is rightly of major concern. As such, it is regulated via annual estimates of species' populations and harvest quotas derived in agreement with local communities and the Ministry of Environment and Tourism (NACSO 2013). Although data from the various conservancy landscapes within the country indicate populations in these areas have generally increased since the advent of Namibia's CBNRM program (Naidoo et al. 2011*b*), evidence on possible negative impacts of trophy hunting on wildlife populations in other parts of Africa (Packer et al. 2010; Lindsey et al. 2013*a*) means that trophy hunting must be carefully monitored in Namibia to ensure the same does not happen. There have been no assessments on how trophy size or quality in particular species may be changing over time, a concern that has been raised for trophy hunting in Africa (Crosmary et al. 2013) and that may result in undesirable genetic changes within hunted populations (Coltman et al. 2003). It is therefore critical that data on the size and quality of trophy exports be analyzed for Namibia's CBNRM program to inform monitoring, evaluation, and management of the trophy-hunting industry. High-profile, apparently illegal hunts such as of lions on the borders of national parks in Zimbabwe, and ethically dubious practices, such as canned hunting of captive animals, also illustrate that the industry itself must play a greater role in addressing issues that throw the sector into disrepute. Finally, growing human populations and a tremendous increase in elephant poaching for the international ivory market may eventually result in reduced quotas of elephants and therefore threaten the financial benefits communal conservancies have generated through trophy hunting.

The sustainability of photographic nature-based tourism in Africa and beyond has also come under scrutiny (Buckley 2004; Newsome et al. 2012). In Namibia relevant issues for ecological sustainability include impacts of intense wildlife viewing on animal behavior, localized environmental implications of the development of tourism infrastructure (lodges, campsites, roads, disposal facilities, etc.) in sensitive arid environments, and climate-change impacts from the carbon emissions of increasing numbers of international visitors. As with trophy hunting, there are few studies, particularly for the first two considerations, that have evaluated the sustainability of tourism initiatives on communal conservancies in Namibia. Furthermore, from a socioeconomic point of view nature-based tourism on communal lands in Namibia has been criticized as having power imbalances or elite capture issues that render communities unable to secure significant shares of the benefits (Hoole 2010; Lapeyre 2011), even though residents of conservancies with high benefit levels are themselves strongly supportive of tourism (Silva & Motzer 2015). Finally, to assess more fully the overall costs and benefits of wildlife conservation on communal lands in Namibia, there is a need for greater investigation of both human-wildlife conflict costs and who bears them, as well as the opportunity

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African Elephant Status Report 2016

An update from the African Elephant Database

C.R. Thouless, H.T. Dublin, J.J. Blanc, D.P. Skinner, T.E. Daniel, R.D. Taylor, F. Maisels, H. L. Frederick and P. Bouché

Occasional Paper of the IUCN Species Survival Commission No. 60

Namibia

ESTIMATED TOTAL ELEPHANTS

22,754 ± 4,305

GUESSES

90 - 90

GENERAL STATISTICS

Country Area	825,418 km²
Range Area	164,069 km² (20%)
Protected Range	18 %
Information Quality Index (IQI)	0.43
CITES Appendix	II
Listing Year	1997

CURRENT ISSUES

Namibia's elephants occur across the northern region of the country, mostly in national parks and community areas. Their range encompasses a wide variety of habitats, from the extremely arid north-west Kunene Region to the well-watered Zambezi (formerly Caprivi) Region, where the elephants form part of the KAZA transfrontier population. Although poaching has increased in the Zambezi Region in the past ten years, it is not seen as a significant threat in Etosha National Park or for populations in Khaudum National Park and Kunene Region.

Elephant hunting takes place in Namibia, and the revenue generated provides significant income to community conservancies (Naidoo et al., 2006). From 2007 to 2015, Namibia declared an annual export quota of elephant hunting trophies of 180, defined as tusks from 90 animals (CITES, n.d.-a).

Namibia's elephant management plan was published in 2007 (Ministry of Environment and Tourism, 2007).

In 2008, Namibia undertook an approved one-off sale of 7,503 kg of ivory to Japan and China, at a price of USD $1,147,369 (Wijnstekers, 2011).

NUMBERS AND DISTRIBUTION

The estimated number of elephants in areas surveyed in the last ten years in Namibia is 22,754 ± 4,305 at the time of the last survey for each area. There may be an additional 90 elephants in areas not systematically surveyed. These guesses likely represent a minimum number, and actual numbers could be higher than those reported. Together, this estimate and guess apply to 84,283 km^2, which is 52% of the estimated known and possible elephant range. There remains an additional 48% of the estimated range for which no elephant population estimates are available.

The elephant population of Namibia has continued to increase although, with wide confidence limits in aerial surveys and elephants moving across international borders, it is not possible to be precise about how great the increase in the national population has been.

There are four main populations, the transfrontier population (with Zambia, Angola, Botswana and Zimbabwe) in the Zambezi Region, in Khaudum National Park in the north-east, the Etosha National Park population, and the Kunene population in the north-west which includes the "desert" elephants.

There has been an increasing trend in elephant numbers in the Zambezi Region since surveys started in the 1980s. This is likely to have been a result of both natural growth and movement from neighbouring countries. **Aerial sample counts** were carried out in 2007, 2011, 2013, 2014, and 2015, giving estimates of 8,380, 10,847 ± 3,580, 9,165 ± 2,016, 14,097 ± 2,678 and 13,116 ± 3,413 (Chase, 2007; Craig & Gibson, 2013b, 2014; Craig, 2011b; Gibson & Craig, 2015a). The previous estimate in the AESR 2007 was 8,725 ± 2,206 (Kolberg, 2004). There was also a total count carried out in 2007 (Chase, 2007) and a sample count in 2008 (Kolberg, 2008). However the latter was carried out with an inexperienced crew and the results were thought to be a considerable underestimate (Kolberg, 2008).

The elephant population of Khaudum NP and the neighbouring community conservancies of Nyae Nyae and N≠a Jaqna have been established since the 1980s, with the provision of artificial water and movements across the border from Botswana. Three **aerial sample counts** were carried out in 2011, 2013 and 2015 giving estimates of 4,731 ± 1,940, 3,638 ± 1,164, and 6,413 ± 2,566 (Craig & Gibson, 2013a; Gibson & Craig, 2015b; MET, 2012). The 2015 figure replaces an estimate of 3,758 ± 2,289 for Khaudum, 61 ± 115 for N#a Jaqna (Kolberg, 2004) and 967 ± 481 for Nyae Nyae (Stander, 2004). None of these are significant differences.

There is a limited movement of elephants between Angola and the Kavango region to the north-west of Khaudum (Terblanche, 2016).

There is a small elephant population in the Mangetti area between Khaudum and Etosha. The AESR 2007 indicated that they occupy the Mangetti Game Reserve, whereas their range is actually concentrated around the Mangetti Cattle Ranch to the west, and also probably extends into the Ukwuangali communal area to the north. Ninety individuals were observed in Mangetti in 2015 (Lindeque, pers. comm., 2016). This **informed guess** replaces one of 20 from 2005 (Ministry of Environment and Tourism, 2005).

Etosha National Park in northern Namibia has an increasingly isolated elephant population, since the perimeter fencing has been upgraded in recent years. There has been a gradual increase in elephant numbers, moderated by deaths from anthrax and poaching. Aerial sample counts were carried out in 2011 and 2012, giving estimates of 3,378 ± 1,756 and 2,810 (confidence limits not available) (Kolberg, 2012; MET, 2012). The most recent **aerial sample count** from 2015 gave an estimate of 2,911 ± 637 (Kilian, 2015) and replaces an estimate of 2,057 ± 598 from 2004 (Kilian & Kolberg, 2004).

It is technically very difficult to count the widely scattered elephant population in the Kunene Region, which includes the 'desert elephants' in the dry, western extremity of the range and there has been controversy about the numbers in this area. A combined sample block count and **aerial total count** was carried out by helicopter in 2011, giving an estimate of 314 ± 154 (MET, 2012). This replaces an estimate of 210 ± 157 from a 2005 survey (Ministry of Environment and Tourism, 2005). It should be noted that the count did not include the extreme northern part of the range around Opuwo, nor the farms to the south of Etosha. There has been some range expansion to both the south and north, with elephants now being resident in the Ugab river basin and about ten elephants resident in the northern Etanga area (Owen-Smith, pers. comm., 2014). The area of **known range** has been changed, and the Etanga group is shown as a point record on the map. The Kunene population appears to have been increasing in numbers and range, despite evidence that the 'desert elephant' sub-population in the Houanib and Houarusib dry riverbeds reduced from 42 to 31 between 2002 and 2015 (Ramey & Brown, 2015).

There are occasional sightings of elephants in livestock ranching areas to the south of their normal range in the area north and east of Windhoek. These are shown as point records on the range map (Hartman, 2014; The Namibian, 2014).

SUMMARY TOTALS

SURVEY CATEGORY	ESTIMATES FROM SURVEYS		GUESSES		KNOWN AND POSSIBLE RANGE	
	ESTIMATE	± 95% CL	FROM	TO	PERCENT (%)	AREA (km²)
Aerial Sample Counts	22,754	4,306	—	—	42 %	68,121
Informed Guesses	0	—	90	90	10 %	16,162
Totals 2015	**22,754**	**4,305**	**90**	**90**		
Totals 2006	**15,807**	**3,276**	**20**	**20**		
Assessed Range					52 %	84,283
Unassessed Range					48 %	79,786
Total Range					100 %	164,069

INTERPRETATION OF CHANGES IN ESTIMATES FROM PREVIOUS REPORT

REASON FOR CHANGE	ESTIMATES FROM SURVEYS		GUESSES		KNOWN AND POSSIBLE RANGE	
	ESTIMATE	± 95% CL	FROM	TO	PERCENT (%)	AREA (km²)
Repeat Survey	+6,947	±5,410	0	0	50 %	81,727
New Guess	0	0	+70	+70	2 %	2,556
Totals	+6,947	±5,410	+70	+70	52 %	84,283

AREA OF RANGE COVERED BY EACH DATA CATEGORY

DATA CATEGORY	KNOWN RANGE (km²)	POSSIBLE RANGE (km²)	TOTAL RANGE (km²)
Direct Sample and Reliable Dung	65,438	2,683	68,121
Informed Guesses	15,903	259	16,162
Unassessed Range	31,130	48,655	79,786
Totals	112,471	51,598	164,069

ELEPHANT ESTIMATES

INPUT ZONE	REASON FOR CHANGE	SURVEY DETAILS			# OF ELEPHANTS		SOURCE	PFS	AREA	MAP LOCATION	
		TYPE	RELIAB.	YEAR	ESTIMATE	± 95% CL			(km²)	LON.	LAT.
Etosha National Park	RS	AS	B	2015	2,911	637	Kilian, 2015	1	18,549	15.8°E	19.0°S
Khaudum-Kavango	RS	AS	B	2015	4,149	1,864	Gibson & Craig, 2015b	2	5,843	20.7°E	19.3°S
Kunene	RS	AS	B	2011	314	154	MET, 2012	1	40,887	14.1°E	20.0°S
Mangetti Area	NG	O	D	2015	90		Lindeque, pers. comm., 2016	2	2,558	18.5°E	18.6°S
Nyae Nyae Conservancy	RS	AS	B	2015	2,264	1,729	Gibson & Craig, 2015b	2	7,001	20.7°E	19.3°S
Zambezi Region	RS	AS	B	2015	13,116	3,413	Gibson & Craig, 2015a	1	17,473	23.5°E	17.9°S

*RANGE OF INFORMED GUESS

*KEY TO REASONS FOR CHANGE

DA: Different Area; DD: Data Degraded, DT: Different Technique; NA: New Analysis, NG: New Guess, NP: New population, PL: Population Lost; RS: Repeat Survey (RS denotes a repeat survey that is not statistically comparable for reasons such as different season),
— : No Change

*KEY TO SURVEY REPORT

AS: Aerial Sample Count; AT: Aerial Total Count; DC: Dung Count; GD: Genetic Dung Count; GS: Ground Sample Count, GT: Ground Total Count; IG: Informed Guess; IR: Individual Registration; OG: Other Guess. Survey Reliability is keyed A-E (best to worst).

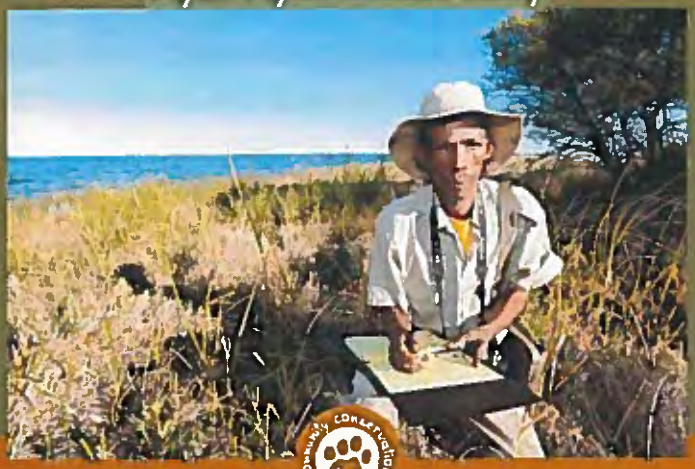
*PFS

Priority for Future Surveys (PFS) is ranked from 1 to 5 (highest to lowest). Based on the precision of estimates and the proportion of national range accounted for by the site in question, PFS is a measure of the importance and urgency for future population surveys. All areas of unassessed range have a priority of 1. See Introduction for details on how the PFS is derived.

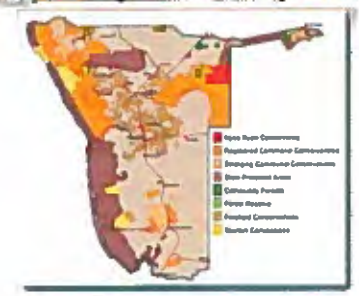
Malengue
Cuando
Kafue GMA
ANGOLA
ZAMBIA
Lubango
Namibe
Bikuar NP
Mongu
Kafue NP
Moçâmedes Partial Reserve
Mupa NP
Mavinga Partial Reserve
Zambezi
Iona NP
Southeast Angola
Cubango
Sioma Ngwezi NP
Bongola
Mucusso GR
Luiana NP
Zambezi Region
Kasene
Bwabwata NP
Mudumo NP
Skeleton Coast NP
Okavango
Khaudum-Kavango
Mamili NP
Mangetti Area
Chobe NP
Etosha NP
Tsumeb
Mangetti NP
Khaudum NP
Moremi GR
Northern Botswana
Nyae Nyae Conservancy
Maun
Kunene
Nxai Pan NP
Otjiwarongo
Makgadikgadi NP
Ghanzi
Ghanzi District
National West Coast Tourist RA
NAMIBIA
BOTSWANA
WINDHOEK
Central Kalahari GR
Swakopmund
Khutse GR
Keetmanshoop
Luderitz
Orange
Vaal
SOUTH AFRICA
0 90 180 270 360 450 540km
Int'l Boundaries
Rivers & Lakes
ELEPHANT RANGE
Known

Living with wildlife

the story of Nyae Nyae Conservancy



Nyae Nyae – Ju|hoansi for the place without mountains but rocky



A CONSERVANCY IS...

- a legally registered area with clearly defined borders and a constituted management body run by the community for the development of residents and the sustainable use of wildlife and tourism
- managed by a group elected to serve the interests of all its members
- a place where residents can add income from wildlife and tourism to traditional farming activities
- a place where wildlife populations increase as they are managed for productive gain
- a place where the value of the natural resources increases, enhancing the value of the land
- a forum through which services and developments can be channelled and integrated
- zoned for multiple uses to minimise conflict and maximise the interests of all stakeholders

Conservancies
enable development and conservation over large areas...

MILESTONES AND SUCCESSES

1991 – an NGO that over time evolves into the Nyae Nyae Development Foundation of Namibia is formed to support the community
1994 – the Nyae Nyae community begins the process to register as a conservancy
1996 – policy changes allow communal area residents to benefit from wildlife and tourism by forming conservancies
1998 – Nyae Nyae Conservancy is registered in February, becoming the first communal conservancy in Namibia
1999 – the Nyae Nyae Conservancy office is established at Tsaraka
99-04 – each year, wildlife is re-introduced into the conservancy, including springbok, red hartebeest, gemsbok, eland, kudu and blue wildebeest, with a total of 2,300 animals being introduced
2001 – an annual game count is started in Nyae Nyae
2002 – the Event Book monitoring system is implemented in Nyae Nyae
2003 – the conservancy office is moved to Tsumkwe
04/05 – a large game-proof camp is erected to manage the remaining Nyae Nyae buffalo population and avoid contact with livestock
2006 – the Nyae Nyae Trust is formed
2008 – black rhino are re-introduced into the conservancy
2009 – an application is lodged with the Ministry of Environment & Tourism to extend the borders of the conservancy to include the village of N!homa
2011 – an application is lodged with the Ministry of Agriculture to register Nyae Nyae Communal Forest, having the same borders and management structures as the conservancy

QUICK FACTS

Region: Otjozondjupa
Approximate population: 2,300
Date of registration: February 1998
Size: 8,992 square kilometres
Main language: Ju'hoansi

interesting culture and dynamic communities committed to sustainability – people living in Nyae Nyae share a common vision for managing their area and its resources

vast, diverse and spectacular landscapes – Nyae Nyae Pans, bushland, magical baobabs... a healthy environment diversifies economic opportunities and drives economic growth

charismatic, free-roaming wildlife – elephant, lion, leopard, wild dog, diverse plains game, abundant birdlife... wildlife generates a variety of benefits for local people

people are living with wildlife, are managing natural resources wisely and are reaping the benefits...

A LITTLE HISTORY

Prior to Namibia's independence in 1990, communal area residents had few rights to use wildlife. Wild animals were often seen as little more than a threat to crops, livestock and infrastructure, as well as community safety. Ground-breaking legislation passed in the mid-nineties laid the foundation for a new approach to the sustainable use of natural resources. By forming a conservancy, people in communal areas can now actively manage – and generate benefits from – wildlife and other resources in their area, encouraging wildlife recoveries and environmental restoration. While a conservancy is a natural resource management structure, it is defined by social ties. Conservancies unite groups of people with the common goal of managing their resources. Today, over 60 communal conservancies embrace one in four rural Namibians, underlining a national commitment to both rural development and conservation.

Nyae Nyae is the oldest, as well as the second largest conservancy in the country, covering close to 9,000 square kilometres. Most of the 2,300 residents are from the Ju'hoansi ethnic group, a sub-group of the San. Historically, the Nyae Nyae area occupied by the Ju'hoansi stretched into Botswana in the east, north beyond what is today Khaudum National Park, south to the settlements of Eiseb and Gam and west beyond the settlement of Aasvoëlnes. Today, Botswana creates the eastern border of the conservancy, while to the south, west and north, Otjiku and Nhe-Jaqna Conservancies and Khaudum National Park adjoin Nyae Nyae, and in turn border onto other conservancies to form a huge contiguous conservation landscape.

The long process to mobilise, unite and support the Nyae Nyae community in forming a conservancy in a sense already began prior to Namibia's independence. In 1981, what is today the Nyae Nyae Development Foundation was formed to support the community in development and resource management. By the time the conservancy legislation was passed in 1996, the Nyae Nyae community was well placed to register the conservancy, which was gazetted in early 1998.

San or Bushman? *Both terms have a slightly derogatory origin. Bushman originates from the Dutch word boesman – an outcast who lives in the bush. San comes from the Nama 'saa' – referring to poor people without cattle. While the Regional San Conference of 1993 adopted San as the official term, Bushman has also lost much of its negative connotation and today is taken to refer more to the great environmental knowledge and bush skills of the San.*

Conservancies are living landscapes...

The culture of the San is legendary, as often idealised lives of a balanced existence within the natural environment. The San have superb hunting skills and 'bush knowledge'. Their keen perception and understanding of the environment has allowed them to live in inhospitable ecosystems such as the Kalahari for countless generations. Nyae Nyae is rich in archaeological artefacts and recent finds indicate a presence of people from the Middle Stone Age. It seems likely that the ancestors of the Ju/'hoansi have roamed across the area for thousands of years and their traditional knowledge and skills have great value.

stalking through African wilderness with a band of hunters, meandering through the veld gathering food, huddled around the evening fire watching traditional dances... the San culture has the power to inspire in us a search for a more harmonised existence

Today, most people in Nyae Nyae no longer live an active hunter-gatherer lifestyle and find themselves very much in a state of cultural transition and social change. Yet wonderful living museums make the past accessible again – for both visitors and a new generation of San no longer in touch with their heritage. 'Keeping our culture alive for our children is one of the most important aspects of the living museum' says Kantee Daqm, a museum guide.

The vast, mostly unfenced Nyae Nyae environment retains a strong wilderness atmosphere, which is enhanced by the fascination of the San culture. Located on the western rim of the Kalahari Basin – the largest accumulation of sand in the world – much of Nyae Nyae is covered by wind blown sands. Areas of rocky ground retain seasonal surface water in the so called 'pannetjieveld' (area of many pans). Here the Nyae Nyae Pans become a very important wetland after good rains. Nyae Nyae is generally flat, varying between 1,100 and 1,200 metres above sea level. The Aha Hills in the far south east of the conservancy create the only real topographical variation.

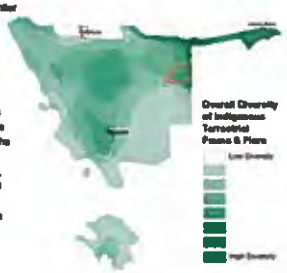
Huge baobabs punctuate the savanna woodland and create a sense of ancient Africa. Rainfall in Nyae Nyae is low and unpredictable, with an annual average of around 450 millimetres. The harshness of the environment is increased by high temperatures and extremely high evaporation. However, the water table is close to the surface, generally lying between two and 25 metres. All these environmental factors contribute to interesting habitat variations and the highest biodiversity found in the communal areas of the Otjozondjupa Region.

a seemingly endless world of bushland and pannetjieveld, dotted here and there with the magical shapes of baobabs and brought to life by the mere expectation of seeing game, by the calls of lion and hyaena at night – and by the light tread of the first people

Since the establishment of conservancies, wildlife numbers in communal areas have rebounded from historic lows prior to independence. Nyae Nyae is one of the last refuges of the African wild dog in Namibia and the only place in the country where all of the Big Five occur – elephant, black rhino, lion, buffalo and leopard. Other mammals include giraffe, eland, kudu, blue wildebeest, roan, gemsbok, hartebeest, springbok, duiker, steenbok, warthog, spotted and brown hyaena, cheetah and jackal. More than 200 bird species have been recorded in the conservancy. Birding around the seasonal Nyae Nyae Pans is spectacular after good rains, when more than 10,000 waterbirds of over 60 species gather here, including great painted snipes, flamingos, wattled cranes and breeding stork egrets. The area has been designated an Important Bird Area by Birdlife International and is eligible for Ramsar Site status.

Nyae Nyae is also rich in flora, and over 100 species of edible plants are utilized by the San. Huge baobabs are the most distinctive feature of many landscapes, but many other plants are of interest and importance, including manketti, teakwood, terminalia, false mopane and a variety of acacia trees, as well as devil's claw and Kalahari melon.

Around Nyae Nyae... The nearby Khaudum National Park is known especially for its numbers of elephant and roan, as well as for its wilderness feel. Both Nyae Nyae and Khaudum form part of the Kavango Zambezi Transfrontier Conservation Area (KAZA). The initiative links five countries and is one of the largest contiguous conservation areas in the world, with the aim of facilitating wildlife movement, conserving natural resources and improving the lives of rural people.



Conservancies
empower rural people...

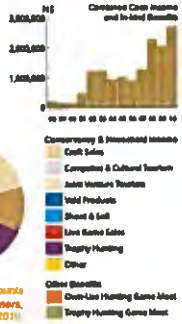
With a national **population** of around 30,000 the San constitute less than two percent of the total Namibian population and have the lowest per capita income of all language groups in the country. Many communities rely on a variety of support and are challenged by social disintegration, alcohol abuse and poverty. Only around 15 percent of San in Namibia have resource utilisation rights to land. The literacy rate is low at around 30%, with school attendance at only half the national average. The few opportunities for formal employment are thus further inhibited by limited levels of formal education. The San have negligible representation in government and the Ju'hoansi are one of only two out of

Nyae Nyae facilitates access to diverse training and capacity building, empowers individuals, especially women, to actively take part in decision-making, as well as instilling a renewed sense of pride in cultural heritage

the six San traditional authorities who have received official recognition. All this is the result of many years of marginalisation.

A variety of **development** initiatives by both government and non-government organisations over the last 30 years have attempted to move the San into modern society. Schools and health facilities have been developed, permanent water points have been established and livestock herding and gardening have been promoted. These activities have had a large influence on San culture. The Nyae Nyae Conservancy has returned natural resource use rights to the Ju'hoansi community. San traditionally live in small groups in a democratic society that has never been structured into typical tribal leadership systems. Each group has a home ground or area with exclusive resource use rights. Around 40 settlements are spread throughout the conservancy.

Tsumkwe, originally a store water source, was established as the administrative centre of the area in 1958. An area of 30 square kilometres around Tsumkwe is excluded from the conservancy. The small town is the only place to buy goods and provides access to a combined school, a clinic and other government **facilities and services**. The nearest hospitals to outside the conservancy at Mangetti Dune and Grootfontein. There are five primary schools in Nyae Nyae and Ju'hoan speakers participating in the Village School Programme have access to schooling in their mother tongue.



Benefits to the conservancy and its members come from a variety of sources. Sources and amounts vary from year to year depending on factors such as agreements with private sector partners, and market fluctuations. The pie chart shows the main benefit sources in 2010.

Harvesting of devil's claw for the health industry is practiced widely, providing income to around 300 to 400 harvesters. Craft production has become an important source of income for both men and women, with over 300 craft producers in the conservancy. While the men concentrate on producing traditional implements such as bows and arrows, women create exquisite ostrich egg shell jewellery and other beautiful items. The Gihumbu Crafts shop, located next to the conservancy office, is a superb local outlet for these crafts.

The C44 gravel road provides **access for visitors** to the area, connecting Tsumkwe with the B8 tar road between Grootfontein and Rundu in the west, as well as the Dobe border post leading to Botswana in the east. Four wheel drive is needed beyond the gravel road, both within Nyae Nyae and to access Khaudum, or when proceeding into Botswana.

the conservancy is enabling a range of new livelihood options for its residents, including tourism, craft production, hunting and indigenous plant harvesting, all of which enable the Ju'hoansi to utilise their traditional knowledge and skills

The people of Nyae Nyae today survive on a complex mix of **livelihood activities**. Veld food and seasonal hunting still supplement other food sources, while livestock herding and small scale gardening are becoming increasingly important. The conservancy itself, as well as related natural resource use activities, provide employment and other benefits. The conservancy has paid for the development of numerous bursaries and distributes individual benefits each year, including annual cash payments, meat from trophy and own-use hunting, the supply of blankets, solar radios and other goods.

The conservancy spends money and provides community and individual benefits in various areas. Areas and amounts vary from year to year depending on factors such as conservancy income and priorities. Private sector jobs are created through agreements with private sector partners. The pie chart shows the main expenditure and benefit areas in 2010.

The Tsumkwe Country Lodge, located in the town, is currently the only fixed **tourism** accommodation. While it does not have a formal relationship with the conservancy, lodge activities include village visits to the living museums at Mountain Pos and Doo Pos, with income going directly to the villages. Another excellent cultural experience, the Living Hunter's Museum, is located at //Xa:ba village along the track to Khaudum and includes a campsite. Wilderness campsites are also located at Mahuri, Djoma and Kramertshop and, although undeveloped, provide nearby villages with some income.

Trophy hunting is currently the biggest source of income for the conservancy and also provides important employment. The area has yielded superb trophies and is considered one of the foremost big game hunting concessions in Namibia.

Nyae Nyae has received a lot of attention from local and international film teams and photographers, and the conservancy has received income from filming and photographic fees, although guidelines for these activities need to be improved and enforced.

the Nyae Nyae Conservancy provides vital structures for managing the communal natural resources of the area in a way that enhances development and ensures sustainability

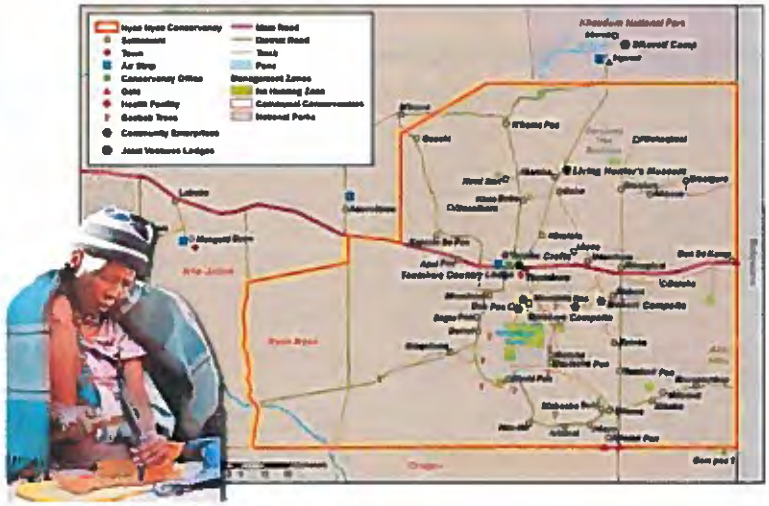
Conservancies
facilitate sustainability...

Nyae Nyae is divided into four areas for management purposes. The **management structure** includes the conservancy board, made up of representatives of each area, as well as the paid positions of chairperson and conservancy manager. The board focuses on appointing the management committee and manager, as well as on strategic planning. The management committee consists of a minimum of five members, including the conservancy manager. It appoints staff, supervises performance and makes short term decisions. Employees include 14 rangers, a CBNRM field officer, three water team staff, a craft trainer, a craft shop coordinator (funded through shop income), a devil's claw coordinator, an agriculture coordinator, an office administrator and a cleaner. Annual general meetings are attended by village representatives, the board and the management committee and are used to decide on benefit distribution, elect board members and the chairperson, approve annual budgets and work plans, as well as deliberate on strategies or programme amendments. The conservancy office is located in Tsumkwe and integrates Ghanzi Crafts. The office is owned by the conservancy, which also owns two four-wheel drives. Conservancy funds are spent on running costs, community development and individual benefit distribution. The funds are managed by a trust administered by the Nyae Nyae Development Foundation.

Activities... The conservancy is based on the traditional Ju'/hoansi /daro land management system, which was recognised by government in 1991. Members have the right to hunt approved game within their /daro on foot with bow and arrows, spears or bird traps. Hunting is reported to the /daro owner and records are submitted to conservancy rangers and the Ministry of Environment & Tourism (MET). The conservancy has been zoned for a variety of land uses, including hunting and tourism. Wildlife reintroductions have significantly boosted game numbers and increased the value of the area for tourism and trophy hunting. An annual game count, done as a simultaneous "full moon count" at waterholes in the conservancy, is carried out in collaboration with the MET and the support of NGOs. Conservancy rangers also do active natural resource monitoring through the Event Book monitoring system, recording data such as game sightings, human wildlife conflict, poaching incidents, game utilisation and any other data deemed important by the conservancy. All data is aggregated into monthly and annual reporting charts that facilitate adaptive management. Based on the game count and Event Book information, the MET sets annual quotas for using wildlife.

The conservancy is active in mitigating human wildlife conflict. With support from the Nyae Nyae Development Foundation and other NGOs, the conservancy has developed "elephant pans" water reservoirs for villages, which has reduced conflicts with elephants to isolated problems at gardens. A system of providing financial offsets for losses is being implemented through the National Policy on Human Wildlife Conflict Management. It will be applied by the conservancy with MET assistance.

A grazing management project seeks to ensure sustainable use of rangeland and mitigate the effects of overgrazing. The conservancy has also attempted to address repeated illegal livestock incursions from neighbouring communal areas. The devil's claw coordinator helps with sustainable harvesting methods and the required permit system, as well as collecting harvests for sale. Further support for the sector is provided by the Centre for Research Information Action in Africa (CRIAA-SADC) and the Millennium Challenge Account - Namibia (MCA). In order to better manage all plant resources of the area, a community forest is in the process of formation, which will be directly integrated with the conservancy



the conservancy uses a mix of modern technologies and traditional knowledge and skills to enable healthy wildlife populations, a productive environment, and the effective management of natural resources

Conservancies
are full of opportunities...

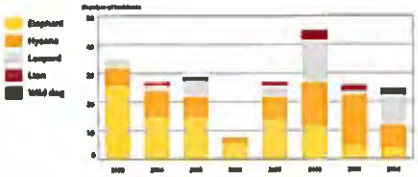
The wonderful mixture of environmental and cultural resources provides largely untapped potential in Nyae Nyae.

Challenges... The San culture is in a state of transition and is susceptible to external pressures, requiring sensitive and well-coordinated developments. Numerous government and NGO support agencies, with a mix of emphasis on social, religious, agricultural and environmental aspects, are active in Nyae Nyae. A more integrated approach to the various activities can facilitate a broader range of benefits for residents.

Nyae Nyae harbours great potential to overcome the social and environmental challenges that the area seems to face — and the conservancy is the ideal structure to coordinate many of the developments

Human wildlife conflict is a challenge where ever people coexist with wild animals, especially if these include elephants and large predators. The creation of artificial water points has increased the resident elephant population in Nyae Nyae, which poses a threat to the area's woodlands, especially in the vicinity of water. Nonetheless, human elephant conflicts have been significantly reduced through village water point protection measures and water points for game. With increases in livestock, predator problems are also increasing. At least some of these can be mitigated by herding livestock and keeping it in secure enclosures at night. Importantly, predators and elephants are of great value, both to the ecosystem and to tourism, and in the long run the benefits gained from these species should outweigh the costs of living with them. Human wildlife conflicts can be further mitigated through actively enforced zoning that sets aside different areas for wildlife and agricultural uses.

There are many unrealised tourism **opportunities** within Nyae Nyae, as well as the greater region. The mixture of the iconic San culture and authentic wilderness experience provides various development options. Interpretation through qualified guiding and excellent information materials can make the complexity of modern San existence and the diversity of the environment accessible to visitors.



Human wildlife conflicts are monitored using the Event Book, indicating trends and improvements, such as reduced elephant conflicts achieved through water point protection measures.

Strategic development, sensitive to social and cultural dynamics as well as the environment, can facilitate a bright future for the oldest and second largest conservancy in Namibia

A variety of **places** for tourism development in Nyae Nyae exist. These need to be well coordinated and should receive continued input from tourism experts. While the planned developments are likely to fill most current gaps in accommodation needs, it is the interpretation of the products and the enhancement of the areas resources that can unlock the full potential. Tourism products could include well laid-out four-by-four routes with wilderness camping, serviced campsites near roads but away from larger settlements, luxury lodges and tented camps, high quality local guiding, birding and other special interest tours. Improvements to the current infrastructure in Khaudum, including the state of artificial waterholes, can facilitate the establishment of the Khaudum tourism route while maintaining the area's wilderness appeal. The development of tourism routes through Nyae Nyae and Khaudum into the Caprivi or Botswana can help the area become one of Namibia's primary wilderness tourism destinations.

Hunting forms an integral part of the San culture. Trophy hunting can play a vital role, providing significant income to the conservancy through concession fees, as well as creating employment that utilises traditional San hunting skills. The superb hunting potential of the vast area in conjunction with the San culture creates a unique and very valuable product. Zoning is especially important to maximise the potential of tourism and hunting products and strengthen core wildlife areas and tourism sites.

Developments should work through the conservancy or coordinate with it, as well as working with the Nyae Nyae Development Foundation. Strategic, well coordinated initiatives can unlock the full value of the area's wildlife and natural plant products, the traditional knowledge and skills of the San, and of course both cultural and wilderness tourism, as well as trophy hunting and other forms of sustainable use. Numerous options exist that can enable a bright future for the conservancy.

Come to Nyae Nyae - be part of the future...

Dorsland Trek Baobabs
Giraffe
Living Museum
Grootfontein
Otjiwarongo
Okonjati
Outjo
Kaptein Hendrik Witbooi Gondenkmal
Kaptein Be Pos
Ryan Nyae Conservancy Office
Ben Se Kamp
Border Post
Tsumkwe Country Lodge
TSUMKWE
Mountain Pos Living Museum
Mahuri Campsite
Dikdikdraai Campsite
Dobe Pos Living Museum
Khaudum
Grootfontein
Rundu
Tsumeb
Otavi
Otjiwarongo
Okahandja
Windhoek
Keetmanshoop
Rehoboth
Mariental
Maltahohe
Luderitz
Aus
Namib-Naukluft Park
Sossusvlei
Swakopmund
Walvis Bay
Henties Bay
Khorixas
Twyfelfontein
Palmwag
Sesfontein
Opuwo
Epupa Falls
Ruacana
Oshakati
Ondangwa
Rundu
Katima Mulilo
Caprivi Strip
Etosha National Park
Etosha Pan
Namutoni
Okaukuejo
Halali
Andoni
Mokuti Etosha Lodge
Etosha Safari Lodge
Dolomite Camp
Onguma Game Reserve
Onguma Tented Camp
Onguma Bush Camp
Onguma Fort Namutoni
Onguma Forest Camp
Onguma Lodge
Onguma Private Game Reserve

MARK SAULSBURY
(b) (6)
ODESSA, TX (b) (6)

88-1287
1163
60

(b) (6)

DATE 3-8-18

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Expires 11/30/2016

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Falls Church, VA 22041-3803
1-800-358-2104 or 703-358-2104

Type of Activity:
Import of Sport-hunted Trophies of Southern African Leopard, African Elephant, and Namibian Southern White Rhinoceros

MAR 23 2018

Complete Sections A or B, and C, D, and E of this application. U.S. address may be required in Section C, see instructions for details.
See attached instruction pages for information on how to make your application complete and help avoid unnecessary delays.

A. Complete if applying as an individual

1.a. Last name	1.b. First name	1.c. Middle name or initial	1.d. Suffix
Williams	Christopher	(b) (6)	

2. Date of birth (mm/dd/yyyy)	3. Occupation	4. Affiliation/ Doing business as (see instructions)
(b) (6)		n/a

5.a. Telephone number	5.b. Alternate telephone number	5.c. Fax number	5.d. E-mail address
(b) (6)			(b) (6)

B. Complete if applying on behalf of a business, corporation, public agency, Tribe, or institution

1.a. Name of business, agency, Tribe, or institution	1.b. Doing business as (dba)

2. Tax identification no.	3. Description of business, agency, Tribe, or institution

4.a. Principal officer Last name	4.b. Principal officer First name	4.c. Principal officer Middle name/ initial	4.d. Suffix

5. Principal officer title	6. Primary contact name

7.a. Business telephone number	7.b. Alternate telephone number	7.c. Business fax number	7.d. Business e-mail address

C. All applicants complete address information

1.a. Physical address (Street address, Apartment #, Suite #, or Room #, no P.O. Boxes)
(b) (6)

1.b. City	1.c. State	1.d. Zip code/Postal code	1.e. County/Province	1.f. Country
Anniston	AL	(b) (6)		USA

2.a. Mailing Address (include if different than physical address, include name of contact person if applicable)

2.b. City	2.c. State	2.d. Zip code/Postal code	2.e. County/Province	2.f. Country

D. All applicants MUST complete

1. Attach check or money order payable to the U.S. FISH AND WILDLIFE SERVICE **in the amount of $100, nonrefundable processing fee**. Federal, Tribal, State, and local government agencies, and those acting on behalf of such agencies, are exempt from the processing fee – ***attach documentation of fee exempt status as outlined in instructions.*** (50 CFR 13.11(d))

2. Do you currently have or have you ever had any Federal Fish and Wildlife permits?
Yes ☐ If yes, list the number of the most current permit you have held or that you are applying to renew/re-issue:_____ No ☑

3. Certification: I hereby certify that I have read and am familiar with the regulations contained in ***Title 50, Part 13 of the Code of Federal Regulations*** and the other ***applicable parts in subchapter B of Chapter I of Title 50***, and I certify that the information submitted in this application for a permit is complete and accurate to the best of my knowledge and (b) (6) understand that any false statement herein may subject me to the criminal penalties of 18 U.S.C. 1001.

Signature of applicant/person responsible for permit (No photocopied or stamped signatures)

03/11/2018
Date of signature (mm/dd/yyyy)

Please continue to next page

E. IMPORT OF SPORT-HUNTED TROPHIES OF SOUTHERN AFRICAN LEOPARD, AFRICAN ELEPHANT, AND NAMIBIAN SOUTHERN WHITE RHINOCEROS

Note 1: If you hold an import permit for a trophy/trophies that you did not use, please **return the unused original permit.** If you are requesting reissuance of a permit because you have taken a trophy, but were unable to import it prior to the expiration of the permit, please use the renewal form (3-200-52; http://www.fws.gov/international/permits/by-form-number/index.html) and return your original permit with that form.

Note 2: *Sport-hunted trophy* is defined at 50 CFR 23.74 as follows: *Sport-hunted trophy* means a whole dead animal or a readily recognizable part or derivative of an animal specifically identified on the accompanying CITES document that meets the following criteria:

(1) Is raw, processed, or manufactured;
(2) Was legally obtained by the hunter through hunting for his or her personal use;
(3) Is being imported, exported, or re-exported by or on behalf of the hunter as part of the transfer from its country of origin ultimately to the hunter's country of usual residence; and
(4) Includes worked, manufactured, or handicraft items made from the sport-hunted animal only when:
  (i) Such items are contained in the same shipment as raw or tanned parts of the sport-hunted animal and are for the personal use of the hunter;
  (ii) The quantity of such items is no more than could reasonably be expected given the number of animals taken by the hunter as shown on the license or other documentation of the authorized hunt accompanying the shipment; and
  (iii) The accompanying CITES documents (export document and, if appropriate, import permit) contain a complete itemization and description of all items included in the shipment.

Note 3: Certain hunting trophies, including leopard, elephant, and rhinoceros hunting trophies, are subject to restrictions on their use after import into the United States. Please see 50 CFR 23.55 for more information or contact the Division of Management Authority.

Please provide the following information. Complete all questions on the application. Mark questions that are not applicable with "N/A". If applying for more than one trophy, be sure to answer questions 2 and 3 for each trophy.

If importing trophies from more than one country, you must submit a separate application for each shipment in order to obtain separate import permits.

1. ENTER the quantity next to the name of the species you are applying to import (you may apply to import specimens of more than one species provided they have been/are being hunted in the same country):

Leopard (*Panthera pardus*) Quantity: n/a (Import is limited to two per hunter per calendar year)

African elephant (*Loxodonta africana*) Quantity: 1 (Import is limited to two per hunter per calendar year)
Note: once imported, ivory cannot be re-exported.

Southern white rhinoceros (*Ceratotherium simum simum*) from Namibia Quantity: n/a (An import permit is not required for trophies harvested in South Africa or Swaziland. If you wish to import from a different country, please use form 3-200-37).

2. **IF ANIMAL IS CURRENTLY LIVING IN THE WILD,** please enter the following:
   a. Country and place (area, region, GIS coordinates, ranch AND nearest city) where wildlife is to be taken from the wild:

   n/a

   b. Date wildlife is to be hunted:

   n/a

c. Description of the trophy and parts you intend to import (e.g., skin, skull, shoulder mount, life size mount, claws, horns, tusks).

n/a

3. **IF THE ANIMAL IS DEAD**, please enter the following:
   a. Country and place (area, region, GIS coordinates, ranch, and/or AND nearest city) where trophy was removed from the wild:

   b. Date wildlife was hunted: Maremiani Singelele Nature Reserve, Musina, South Africa
   May 12, 2016

   c. Description of the trophy and parts you intend to import (e.g., skin, skull, shoulder mount, life size mount, claws, horn, tusks):

   (2) tusks, (2) ears prepared for decorative painting, tail with mounting hardware, (2) skin panels, 4 feet (2 to made into stools) and (2 to made into trash cans).

   d. The current location of the trophy (address and country) [the U.S. import permit will identify this country as the country of export/re-export and must match with the export/re-export document]:

   Safari Taxidermy
   47 Goud St.,Laboria, Polokwane, RSA

4. Complete name and address of overseas person or business shipping the trophy to you. If you are applying to import a trophy directly from Namibia, you **must** provide the name and address of the professional hunter listed on your Namibian hunting permit [this name will appear on the face of the export permit].

Name: Business	Safari Taxidermy
Name: Address:	PO Box 235, Ladanna, 0704
Address:	47 Goud St., Labotia,
City:	Polokwane
State/Province:	Limpopo
Country, Postal Code:	Republic of South Africa 0704

5. Please be aware that the U.S. Fish and Wildlife Service may need to make a finding that your activities will enhance or benefit wild populations of the species involved. If you have any information that could support this finding (e.g., how the funds from license/trophy fees will be spent, what portion of the hunting fee will support conservation), please submit such information on a separate page with your application.

CERTIFICATION STATEMENT (original signature must be provided for either 6 or 7 below)

6. **If you are a broker or taxidermist applying on behalf of a foreign national,** provide documentation to show you have a **Power of Attorney** to act on your client's behalf and sign the following statement.

   I acknowledge that the sport-hunted trophy/trophies to be imported has been/will be personally hunted by my client and is being imported only for my client's personal use (i.e., **not for sale, transfer, donation, or exchange that is reasonably likely to result in economic use, gain, or benefit**). I understand that my client may only import two leopard trophies in one calendar year. I understand that my client may only import two African elephant trophies in one calendar year. In addition, I have advised my client that raw ivory, once imported into the United States, cannot be re-exported.

   Taxidermist/Broker's signature:_____ Date: _____

7. **If you are the hunter applying to import your own trophy**, please read and sign the following statement.

I acknowledge that the sport-hunted trophy/trophies to be imported has been/will be personally hunted by me and is being imported only for my personal use (i.e., **not for sale, transfer, donation, or exchange that is reasonably likely to result in economic use, gain, or benefit**). I understand that I may only import two leopard trophies in one calendar year. I understand that I may only import two African elephant trophies in one calendar year. In addition, I understand that raw ivory, once im(b)(6) into the United States, cannot be re-exported.

Applicant's signature: [redacted] Date: 3/11/18

Be aware that there may be additional permitting or approval requirements by your local or state governments, as well as required by other Federal agencies or foreign government to conduct your propose activity. While the Service will attempt to assist where possible, it is your responsibility to obtain such approval.

8. All international shipment(s) must be through a designated port. A list of designated ports (where an inspector is posted) is available from http://www.fws.gov/le/designated-ports.html. If you wish to use a port not listed, please contact the Office of Law Enforcement for a Designated Port Exemption Permit (form 3-200-2).

9. Name and address where you wish the permit to be mailed, **if** different from page 1 (All permits will be mailed via the U.S. Postal Service, unless you identify an alternative means below):

10. If you wish the permit to be delivered by means other than USPS regular mail, provide an air bill, pre-paid envelope, or billing information. If you do not have a pre-paid envelope or air bill and wish to pay for a courier service with your credit card, please check the box below. Please DO NOT include credit card number or other information; you will be contacted for this information.

☐ If a permit is issued, please send it via a courier service to the address on page 1 or question 9. I understand that you will contact me for my credit card information once the application has been processed.

11. Who should we contact if we have questions about the application? (Include name, phone number, and email):

12. **Disqualification Factor.** A conviction, or entry of a plea of guilty or nolo contendere, for a felony violation of the Lacey Act, the Migratory Bird Treaty Act, or the Bald and Golden Eagle Protection Act disqualifies any such person from receiving or exercising the privileges of a permit, unless such disqualification has been expressly waived by the Service Director in response to a written petition. (50 CFR 13.21(c)) Have you or any of the owners of the business, if applying as a business, been convicted, or entered a plea of guilty or nolo contendere, forfeited collateral, or are currently under charges for any violations of the laws mentioned above?

☐ Yes ☑ No If you answered "Yes" provide: a) the individual's name, b) date of charge, c) charge(s), d) location of incident, e) court, and f) action taken for each violation.

VMU 35/2016

ORDINARY PERMIT

PERMIT NUMBER: O № 13976

(Issued in terms of the provisions of the National Environmental Management: Biodiversity Act 2004, Act 10 of 2004)

NAME	Environmental Affairs
ADDRESS	Musina
PROVINCE	Limpopo

DETAILS OF PERMIT HOLDER

NAME	Mr Christopher (b) (6)	ID NO.	
SURNAME	Williams	PASSPORT NO.	(b) (6)

	POSTAL ADDRESS	RESIDENTIAL ADDRESS
ADDRESS		
ADDRESS		(b) (6)
ADDRESS		Anniston, AL
TOWN		(b) (6)
POSTAL CODE		USA
PROVINCE		

PROPERTY WHERE RESTRICTED ACTIVITIES WILL BE CARRIED OUT

NAME AND SURNAME OF APPLICANT	Mr Petrus Cornelius Jansen
NAME AND SURNAME: RESPONSIBLE PERSON	Mr Piet Jansen
NAME AND SURNAME OF AGENT	
PHYSICAL ADDRESS OF FACILITY	
PHYSICAL ADDRESS OF FACILITY	
DISTRICT	Vhembe
PROVINCE	Limpopo
REGISTERED NAME AND NUMBER (in the case of game farm)	Maremani Nature Reserve

DETAILS OF SPECIES INVOLVED

SPECIES		SEX (If known)	QUANTITY	MARKING (if applicable)
COMMON NAME	SCIENTIFIC NAME			
African Elephant	Loxodonta africana	Male	1 (One)	

DETAILS OF RESTRICTED ACTIVITIES INVOLVED

To hunt one elephant bull, during the day with a rifle. Tusk must be marked at the local Environmental office before they are conveyed to a taxidermy

NAME AND SURNAME OF PURCHASER/SELLER	
RESIDENTIAL ADDRESS OF PURCHASER/SELLER	

IN THE CASE OF INTERNATIONAL IMPORT/EXPORT:

NAME AND SURNAME OF CONSIGNEE/CONSIGNOR	
RESIDENTIAL ADDRESS OF CONSIGNEE/CONSIGNOR	

IN THE CASE OF A HUNT:

NAME AND SURNAME OF HUNTING CLIENT (if applicable)	Mr Christopher Shawn Williams
NAME AND SURNAME OF PROFESSIONAL HUNTER (if applicable)	Mr P Jansen
NAME AND SURNAME OF HUNTING OUTFITTER (if applicable)	Mr P Jansen
WEAPON AND METHOD OF HUNTING	Rifle, walk and stalk

IN THE CASE OF POSSESSION OF ELEPHANT IVORY OR RHINOCEROS HORN:

WEIGHT OF EACH PIECE APPLIED FOR	7,5 & 8,0 kg
LENGTH OF THE ELEPHANT IVORY	96,0 & 90,0 cm
BASE CIRCUMFERENCE OF ELEPHANT IVORY OR RHINOCEROS HORN	33,0 & 33,0 cm
REGISTRATION NUMBER ZA 16 2219 7,5 kg &	ZA 16 2220 8,0 kg 19/5/16
MICROCHIP NUMBER	N/A

PERMIT VALIDATION

PERIOD OF VALIDITY	FROM: 07/05/2016	TO:	18/05/2016
RECEIPT NUMBER	107520		

DEPARTMENT OF ECONOMIC DEVELOPMENT, ENVIRONMENT & TOURISM

AUTHORISED / ~~NOT AUTHORISED~~

SIGNATURE OF ISSUING OFFICER:	SIGNATURE OF PERMIT HOLDER: X
DATE STAMP: 2016 -05- 05	
SIGNATURE	

WILDLIFE TRADE & REGULATION

ns

25

SOUTH AFRICAN PROFESSIONAL HUNTING REGISTER AND TROPHY EXPORT APPLICATION

Duration of Hunt Commenced 07 / 05 / 2016 Terminated 18 / 05 / 2016

A. LP Nº 081096

Tick appropriate Province block where hunt took place (separate sheet for each Province)

KwaZulu-Natal (KZN)	Free State (FS)	Gauteng (GP)	Limpopo Province (LP)	North West (NW)	Mpumalanga (MPA)	Western Cape (CNC)	Eastern Cape (EC)	Northern Cape (NC)
			✓					

POST PERMIT TO (Mark correct block with X)

PROFESSIONAL HUNTER

Name P JANSEN

Business Address EAST CRESCENT1
MUSINA
0900

ID No 8103155035086

PH Permit No 0098 CPM 401-01-277

Date 18/05/2016 Signature Jansen

CLIENT

Name Christopher (b) (6) WILLIAMS

Permanent Postal Address (b) (6)
ANNISTON, AL
Code (b) (6) Country U.S.A

Passport No (b) (6)

Tel/Fax

Date 18/05/2016 Signature (b) (6) Williams

HUNTING OUTFITTER

Name P C JANSEN

Business Address EAST CRESCENT1
MUSINA Code 0900

ID No 5905265008081

Tel No 0155340207 Fax No —

HO Permit No ZA/LP/75275

Date 18/05/2016 Signature Jansen

Farm Name Registration No	Magisterial District	Name & Residential Address of Land Owner	Hunting Permit Certificate/Licence No	Date of Hunt From	Date of Hunt To	Species Killed or Wounded	Number Killed or Wounded	Sex F	Sex M	Part of Trophy to be Exported
MAREMANI Singelele nature Reserve MT6	MUSINA	P C JANSEN P.O. Box X1225 MUSINA 0900	0 13976	07/05/2016	18/05/2016	ELEPHANT	1		✓	TUSKS x2 FEET x4 EARS x2 TAIL SKIN

Copies Client Original

1st copy Forward to Nature Conservation authority where hunt took place

Hunting Outfitter 2nd copy Retain for a period of three years

Professional Hunter Last copy Remains in book

Address to which trophies are to be sent

Code

Country Trophy Export Date (Estimate)

CHRIS [redacted] WILLIAMS
(b)(6) (b) [redacted]
ANNISTON, AL (b)(6)

(b)(6) [redacted]

3/11/18
Date

Pay to the Order of US Fish And Wildlife Service | $ 100.00

One-hundred Dollars

AOD
FEDERAL CREDIT UNION
PO Box 608, Bynum, AL 36253

For

(b)(6) [redacted]

Department of the Interior
U.S. Fish and Wildlife Service

Federal Fish and Wildlife Permit Application Form

OMB No. 1018-0164
Expires 11/30/2018

RCVD JAN 10 2018

1-10-18

Return to: U.S. Fish and Wildlife Service
Division of Management Authority (DMA)
Branch of Permits, MS: IA
5275 Leesburg Pike
Falls Church, VA 22041-3803
1-800-358-2104 or 703-358-2104

Type of Activity:
Import of Sport-hunted Trophies of Southern African Leopard, African Elephant, and Namibian Southern White Rhinoceros

Complete Sections A or B, and C, D, and E of this application. U.S. address may be required in Section C, see instructions for details.
See attached instruction pages for information on how to make your application complete and help avoid unnecessary delays.

A. Complete if applying as an individual

1.a. Last name	1.b. First name	1.c. Middle name or initial	1.d. Suffix
Roberts	Scott	(b) (6)	

2. Date of birth (mm/dd/yyyy)	3. Occupation	4. Affiliation/ Doing business as (see instructions)	
(b) (6)			

5.a. Telephone number	5.b. Alternate telephone number	5.c. Fax number	5.d. E-mail address
(b) (6)			info@safarispecialtyimporters.com

B. Complete if applying on behalf of a business, corporation, public agency, Tribe, or institution

1.a. Name of business, agency, Tribe, or institution	1.b. Doing business as (dba)		

2. Tax identification no.	3. Description of business, agency, Tribe, or institution		

4.a. Principal officer Last name	4.b. Principal officer First name	4.c. Principal officer Middle name/ initial	4.d. Suffix

5. Principal officer title	6. Primary contact name		

7.a. Business telephone number	7.b. Alternate telephone number	7.c. Business fax number	7.d. Business e-mail address

C. All applicants complete address information

1.a. Physical address (Street address; Apartment #, Suite #, or Room #; no P.O. Boxes)
(b) (6)

1.b. City	1.c. State	1.d. Zip code/Postal code:	1.e. County/Province	1.f. Country
Benton City	WA	(b) (6)		USA

2.a. Mailing Address (include if different than physical address; include name of contact person if applicable)

2.b. City	2.c. State	2.d. Zip code/Postal code:	2.e. County/Province	2.f. Country

D. All applicants MUST complete

1. Attach check or money order payable to the U.S. FISH AND WILDLIFE SERVICE **in the amount of $100, nonrefundable processing fee**. Federal, Tribal, State, and local government agencies, and those acting on behalf of such agencies, are exempt from the processing fee – ***attach documentation of fee exempt status as outlined in instructions.*** (50 CFR 13.11(d))

2. Do you currently have or have you ever had any Federal Fish and Wildlife permits?
Yes ☐ If yes, list the number of the most current permit you have held or that you are applying to renew/re-issue: _____ No ☑

3. Certification: I hereby certify that I have read and am familiar with the regulations contained in ***Title 50, Part 13 of the Code of Federal Regulations*** and the other ***applicable parts in subchapter B of Chapter I of Title 50***, and I certify that the information submitted in this application for a permit is complete and accurate to the best of my knowledge and belief. I understand that any false statement herein may subject me to the criminal penalties of 18 U.S.C. 1001.

Priscilla Quintairos for Scott N. Roberts (POA) — 12-27-2017

Signature of applicant/person responsible for permit (No photocopied or stamped signatures) — Date of signature (mm/dd/yyyy)

Please continue to next page

E. IMPORT OF SPORT-HUNTED TROPHIES OF SOUTHERN AFRICAN LEOPARD, AFRICAN ELEPHANT, AND NAMIBIAN SOUTHERN WHITE RHINOCEROS

Note 1: If you hold an import permit for a trophy/trophies that you did not use, please **return the unused original permit**. If you are requesting reissuance of a permit because you have taken a trophy, but were unable to import it prior to the expiration of the permit, please use the renewal form (3-200-52; http://www.fws.gov/international/permits/by-form-number/index.html) and return your original permit with that form.

Note 2: *Sport-hunted trophy* is defined at 50 CFR 23.74 as follows: *Sport-hunted trophy* means a whole dead animal or a readily recognizable part or derivative of an animal specifically identified on the accompanying CITES document that meets the following criteria:

(1) Is raw, processed, or manufactured;
(2) Was legally obtained by the hunter through hunting for his or her personal use;
(3) Is being imported, exported, or re-exported by or on behalf of the hunter as part of the transfer from its country of origin ultimately to the hunter's country of usual residence; and
(4) Includes worked, manufactured, or handicraft items made from the sport-hunted animal only when:
  (i) Such items are contained in the same shipment as raw or tanned parts of the sport-hunted animal and are for the personal use of the hunter;
  (ii) The quantity of such items is no more than could reasonably be expected given the number of animals taken by the hunter as shown on the license or other documentation of the authorized hunt accompanying the shipment; and
  (iii) The accompanying CITES documents (export document and, if appropriate, import permit) contain a complete itemization and description of all items included in the shipment.

Note 3: Certain hunting trophies, including leopard, elephant, and rhinoceros hunting trophies, are subject to restrictions on their use after import into the United States. Please see 50 CFR 23.55 for more information or contact the Division of Management Authority.

Please provide the following information. Complete all questions on the application. Mark questions that are not applicable with "N/A". If applying for more than one trophy, be sure to answer questions 2 and 3 for each trophy.

If importing trophies from more than one country, you must submit a separate application for each shipment in order to obtain separate import permits.

1. ENTER the quantity next to the name of the species you are applying to import (you may apply to import specimens of more than one species provided they have been/are being hunted in the same country):

Leopard (*Panthera pardus*) Quantity: 0 (Import is limited to two per hunter per calendar year)

African elephant (*Loxodonta africana*) Quantity: 1 (Import is limited to two per hunter per calendar year)
Note: once imported, ivory cannot be re-exported.

Southern white rhinoceros (*Ceratotherium simum simum*) from Namibia Quantity: 0 (An import permit is not required for trophies harvested in South Africa or Swaziland. If you wish to import from a different country, please use form 3-200-37).

2. **IF ANIMAL IS CURRENTLY LIVING IN THE WILD**, please enter the following:
   a. Country and place (area, region, GIS coordinates, ranch AND nearest city) where wildlife is to be taken from the wild:

   b. Date wildlife is to be hunted:

c. Description of the trophy and parts you intend to import (e.g., skin, skull, shoulder mount, life-size mount, claws, horns, tusks). Full Leopard

3. **IF THE ANIMAL IS DEAD**, please enter the following:
   a. Country and place (area, region, GIS coordinates, ranch, and/or AND nearest city) where trophy was removed from the wild:

   b. Date wildlife was hunted: Salambala Farm (Closest Town Katima Mulilo), NAMIBIA
   9-9-2016

   c. Description of the trophy and parts you intend to import (e.g., skin, skull, shoulder mount, life size mount, claws, horn, tusks):

   Full

   d. The current location of the trophy (address and country) [the U.S. import permit will identify this country as the country of export/re-export and must match with the export/re-export document]:

   Reisner Taxidermy
   Windhoek, Namibia

4. Complete name and address of overseas person or business shipping the trophy to you. If you are applying to import a trophy directly from Namibia, you **must** provide the name and address of the professional hunter listed on your Namibian hunting permit [this name will appear on the face of the export permit].

Name: Business	JAPSIE BLAAUW
Name: Address:	OMUJEVE SAFARIS
Address:	ONGOMBO WEST SECTION 2, NUMBER 56
City:	Windhoek
State/Province:	NAMIBIA
Country, Postal Code:	

5. Please be aware that the U.S. Fish and Wildlife Service may need to make a finding that your activities will enhance or benefit wild populations of the species involved. If you have any information that could support this finding (e.g., how the funds from license/trophy fees will be spent, what portion of the hunting fee will support conservation), please submit such information on a separate page with your application.

CERTIFICATION STATEMENT (original signature must be provided for either 6 or 7 below)

6. **If you are a broker or taxidermist applying on behalf of a foreign national,** provide documentation to show you have a **Power of Attorney** to act on your client's behalf and sign the following statement.

   I acknowledge that the sport-hunted trophy/trophies to be imported has been/will be personally hunted by my client and is being imported only for my client's personal use (i.e., **not for sale, transfer, donation, or exchange that is reasonably likely to result in economic use, gain, or benefit**). I understand that my client may only import two leopard trophies in one calendar year. I understand that my client may only import two African elephant trophies in one calendar year. In addition, I have advised my client that raw ivory, once imported into the United States, cannot be re-exported.

   Taxidermist/Broker's signature:_____ Date: _____

7. **If you are the hunter applying to import your own trophy**, please read and sign the following statement.

I acknowledge that the sport-hunted trophy/trophies to be imported has been/will be personally hunted by me and is being imported only for my personal use (i.e., **not for sale, transfer, donation, or exchange that is reasonably likely to result in economic use, gain, or benefit**). I understand that I may only import two leopard trophies in one calendar year. I understand that I may only import two African elephant trophies in one calendar year. In addition, I understand that raw ivory, once imported into the United States, cannot be re-exported.

Applicant's signature: Rosella Quartarone for Scott N. Roberts (POA) Date: 12-27-2017

Be aware that there may be additional permitting or approval requirements by your local or state governments, as well as required by other Federal agencies or foreign government to conduct your propose activity. While the Service will attempt to assist where possible, it is your responsibility to obtain such approval.

8. All international shipment(s) must be through a designated port. A list of designated ports (where an inspector is posted) is available from http://www.fws.gov/le/designated-ports.html. If you wish to use a port not listed, please contact the Office of Law Enforcement for a Designated Port Exemption Permit (form 3-200-2).

9. Name and address where you wish the permit to be mailed, if different from page 1 (All permits will be mailed via the U.S. Postal Service, unless you identify an alternative means below):

SEE ATTACHED PREPAID FEDEX LABEL TO: Safari Specialty Importers, 758 Sheldon Rd, Wallkill NY 12589

10. If you wish the permit to be delivered by means other than USPS regular mail, provide an air bill, pre-paid envelope, or billing information. If you do not have a pre-paid envelope or air bill and wish to pay for a courier service with your credit card, please check the box below. Please DO NOT include credit card number or other information; you will be contacted for this information.

☐ If a permit is issued, please send it via a courier service to the address on page 1 or question 9. I understand that you will contact me for my credit card information once the application has been processed.

11. Who should we contact if we have questions about the application? (Include name, phone number, and email):

Rosella Quartarone, SAFARI SPECIALTY IMPORTERS
845-943-5943 or eMail info@safarispecialtyimporters.com

12. **Disqualification Factor.** A conviction, or entry of a plea of guilty or nolo contendere, for a felony violation of the Lacey Act, the Migratory Bird Treaty Act, or the Bald and Golden Eagle Protection Act disqualifies any such person from receiving or exercising the privileges of a permit, unless such disqualification has been expressly waived by the Service Director in response to a written petition. (50 CFR 13.21(c)) Have you or any of the owners of the business, if applying as a business, been convicted, or entered a plea of guilty or nolo contendere, forfeited collateral, or are currently under charges for any violations of the laws mentioned above?

☐ Yes ☑ No If you answered "Yes" provide: a) the individual's name, b) date of charge, c) charge(s), d) location of incident, e) court, and f) action taken for each violation.

SAFARI SPECIALTY IMPORTERS, INC.
"Hunting is Our Only Business"

Robert and Rosella Quartarone
P.O. Box 153
Pine Bush, NY 12566
1.845.943.5943
www.safarispecialtyimporters.com
info@safarispecialtyimporters.com

Authorization to Import

I, Scott [redacted] Roberts (Print Client Name), hereinafter referred to as the "Client", hereby authorize *Safari Specialty Importers, Inc.* and its successors, assignees or agents to act on my behalf for the importing and/or exporting of hunted trophies for my personal use. *This includes the authorization to obtain any necessary information, make payment on behalf of, and sign related paperwork needed for the importation of such trophies.*

I, the *Client*, agree to indemnify, defend, and hold harmless, *Safari Specialty Importers, Inc.* together with its successors, assignees or agents, from and against any and all demands, claims, and damages to persons or property, losses and liabilities, including reasonable attorney's fees, arising out of or caused by negligence or willful misconduct of any third party.

I, the *Client*, agree to the Payment Terms attached hereto and made a part hereof.

This Authorization to Import will remain in effect unless cancelled in writing by the undersigned.

Client Signature — Date: 9-11-17

Scott [redacted] Roberts
Print Name

[redacted] Benton City, WA [redacted]
Address/City/State/Zip

[redacted]
Phone

[redacted]
eMail

MINISTRY OF ENVIRONMENT AND TOURISM
Directorate Scientific Services
Private Bag 13306
Windhoek, Namibia
Enquiries: Chief Warden, Permit Office
Tel +264-61-284 2111
Fax +264-61-258 861

PERMIT No.:	
VALID FROM:	31.08.16
VALID TO:	14.09.16

PERMIT TO HUNT FOR TROPHIES

Permission is hereby granted in terms of the Nature Conservation Ordinance 1975 (Ord. 4 of 1975)

Name of Trophy Hunter: G Roberts

Residential Address:

Country: USA

to hunt the specified number of game for the sake of trophies:

CITES Indicates species listed on CITES Appendix I or II

	SPECIES: COMMON NAME	Number
	Buffalo Kabula/Salam	1X
CITES I	Crocodile	/
	Dik-dik	/
	Eland	
CITES II	Elephant	1X
	Giraffe	/
	Grey Duiker	
CITES III	Hippopotamus Lisse/Kabula	1X
	Impala, Black-faced	—
	Impala, common Salam	1X
	Klipspringer	—
	Kudu Salam	1X
CITES II	Lechwe	
	Oryx (Gemsbok)	
	Ostrich	
	Red hartebeest	
	Reedbuck	
CITES I	Rhinoceros, black	
CITES I	Rhinoceros, white	
	Roan	
	Sable	
	Springbok	

	SPECIES: COMMON NAME	Number
	Steenbok	—
	Warthog Salam	1X
	Waterbuck	—
	Wildebeest, blue Salam	1X
	Zebra, Burchell's Lisse/Salam	1X
CITES II	Zebra, Hartman's mountain	
	Blesbok	
	Wildebeest, black	
CITES I	Cheetah	
CITES I	Leopard	
CITES II	Lion	
	Other	
	*Please report back within 48hrs after shooting	

on the following farms / hunting concessions: Salambala + Kabulabula + Lisese Conservancy

Guided by (name of guides): J. Blaauw

Cashier receipt No. MET6324

Issued on 24.08.16

Amount received: N$ 1000

Authorizing officer

Official MET date stamp

IMPORTANT: This permit is not valid if altered in any way.

prime press 072015

The following certificate must be completed immediately after each animal that has been hunted (please print)

Date	Species	LH*	RH*	LB*	RB*	Total	RW*	Age	Male/ Female	Farm		Signatures		
										Name	No	Farm owner	Hunter	Professional hunter Master hunting guide Hunting guide
7-9-2016	Buffalo	184	34	34	252			10	♂	Kabulabula				
7-9-2016	Elephant							40	♂	Salambala				

*L= Left, R=Right, H=Horn, B=Base, RW=Rowland Ward

No trophy hunter may hunt unless accompanied by a professional hunter, master hunting guide or hunting guide.

This permit must be kept on the person of the permit-holder at all times while hunting.

Only guide(s) as specified on the permit may conduct the hunt.

SAFARI SPECIALTY IMPORTERS, INC.
"Hunting Is Our Only Business"
Safari Specialty Importers, Inc.
76 BONIFACE DRIVE SUITE 7
PINE BUSH, NY 12566
(845) 943-5943
(b) (4)
Pay to the order of U. S. Fish + Wildlife Services
12-27-17
date
1-2/210
One hundred w/100
$ 100 w/++
dollars
CHASE
JPMorgan Chase Bank, N.A.
www.Chase.com
for Scott Roberts Elephant
(b) (4)

Department of the Interior
U.S. Fish and Wildlife Service

Federal Fish and Wildlife Permit Application Form

OMB No. 1018-0093
Expires 05/31/2017

RCVD JAN 11 2018 LB

Return to: U.S. Fish and Wildlife Service
Division of Management Authority (DMA)
Branch of Permits, MS: IA
5275 Leesburg Pike
Falls Church, VA 22041-3803
1-800-358-2104 or 703-358-2104

Type of Activity:
Import of Sport-hunted Trophies of Southern African Leopard, African Elephant, and Namibian Southern White Rhinoceros

Complete Sections A or B, and C, D, and E of this application. U.S. address may be required in Section C, see instructions for details.
See attached instruction pages for information on how to make your application complete and help avoid unnecessary delays.

A. Complete if applying as an individual

1.a. Last name	1.b. First name	1.c. Middle name or initial	1.d. Suffix
Berg	Verlin	(b) (6) [redacted]	

2. Date of birth (mm/dd/yyyy)	3. Social Security No.	4. Occupation	5. Affiliation/ Doing business as (see instructions)
(b) (6) [redacted]			

6.a. Telephone number	6.b. Alternate telephone number	6.c. Fax number	6.d. E-mail address
(b) (6) [redacted]			

B. Complete if applying on behalf of a business, corporation, public agency, Tribe, or institution

1.a. Name of business, agency, Tribe, or institution	1.b. Doing business as (dba)

2. Tax identification no.	3. Description of business, agency, Tribe, or institution

4.a. Principal officer Last name	4.b. Principal officer First name	4.c. Principal officer Middle name/ initial	4.d. Suffix

5. Principal officer title	6. Primary contact name

7.a. Business telephone number	7.b. Alternate telephone number	7.c. Business fax number	7.d. Business e-mail address

C. All applicants complete address information

1.a. Physical address (Street address, Apartment #, Suite #, or Room #; no P.O. Boxes)
(b) (6) [redacted]

1.b. City	1.c. State	1.d. Zip code/Postal code	1.e. County/Province	1.f. Country
Petersburg	WV	(b) (6) [redacted]		USA

2.a. Mailing Address (include if different than physical address, include name of contact person if applicable)
same

2.b. City	2.c. State	2.d. Zip code/Postal code.	2.e. County/Province	2.f. Country

D. All applicants MUST complete

1. Attach check or money order payable to the U.S. FISH AND WILDLIFE SERVICE **in the amount of $100, nonrefundable processing fee** Federal, Tribal, State, and local government agencies, and those acting on behalf of such agencies, are exempt from the processing fee – ***attach documentation of fee exempt status as outlined in instructions.*** (50 CFR 13.11(d))

2. Do you currently have or have you ever had any Federal Fish and Wildlife permits?
Yes ☒ If yes, list the number of the most current permit you have held or that you are applying to renew/re-issue: 15US80094B/9 No ☐

3. Certification: I hereby certify that I have read and am familiar with the regulations contained in ***Title 50, Part 13 of the Code of Federal Regulations*** and the other ***applicable parts in subchapter B of Chapter I of Title 50***, and I certify that the information submitted in this application for a permit is complete and accurate to the best of my knowledge and belief. I understand that any false statement herein may subject me to the criminal penalties of 18 U.S.C. 1001.

Signature (**in blue ink**) of applicant/person responsible for permit (No photocopied or stamped signatures) — Date of signature (mm/dd/yyyy): 12/15/2017

Please continue to next page

E. IMPORT OF SPORT-HUNTED TROPHIES OF SOUTHERN AFRICAN LEOPARD, AFRICAN ELEPHANT, AND NAMIBIAN SOUTHERN WHITE RHINOCEROS

Note 1: If you hold an import permit for trophy/trophies that you did not use, please **return the unused original permit.** If you are requesting reissuance of a permit because you have taken a trophy, but were unable to import it prior to the expiration of the permit, please use the renewal form (3-200-52; http://www.fws.gov/international/permits/by-form-number/index.html) and return your original permit with that form.

Note 2: The U.S. FWS has determined that a trophy consists of raw or tanned parts of a specimen taken by a hunter during a sport hunt for personal use. It may include the bones, claws, hair, head, hide, hooves, horns, meat, skull, teeth, tusks, or any taxidermied part, including, but not limited to, a rug or taxidermied head, shoulder, or full mount. It does not include articles made from a trophy, such as worked, manufactured, or handicraft items for use as clothing, curios, ornamentation, jewelry, or other utilitarian items. If you wish to import such products, please contact the Division of Management Authority for the proper application form.

Note 3: Certain hunting trophies, including leopard, elephant, and rhinoceros hunting trophies, are subject to restrictions on their use after import into the United States. Please see 50 CFR 23.55 for more information or contact the Division of Management Authority.

Please provide the following information. Complete all questions on the application. Mark questions that are not applicable with "N/A". If applying for more than one trophy, be sure to answer questions 2 and 3 for each trophy. If importing trophies from more than one country, you must submit a separate application for each shipment in order to obtain separate import permits.

1. ENTER the quantity next to the name of the species you are applying to import (you may apply to import specimens of more than one species provided they have been/are being hunted in the same country):

Leopard (*Panthera pardus*) Quantity: _____ (Limited to the import of two per calendar year)

African elephant (*Loxodonta africana*) Quantity: ___1___ (Import permit is not required for trophies harvested in Botswana, Namibia, South Africa, or Zimbabwe). **Note: once imported, ivory cannot be re-exported.**

Southern white rhinoceros (*Ceratotherium simum simum*) from Namibia Quantity: _____ (An import permit is not required for trophies harvested in South Africa or Swaziland. If you are looking to import from a different country, please use form 3-200-37).

2. **IF ANIMAL IS CURRENTLY LIVING IN THE WILD**, please enter the following:
   a. Country and place (area, region, GIS coordinates, ranch AND nearest city) where wildlife is to be taken from the wild:

   b. Date wildlife is to be hunted:

   c. Description of the trophy and parts you intend to import (e.g., skin, skull, shoulder mount, life size mount, claws, horns, tusks).

3. **IF THE ANIMAL IS DEAD**, please enter the following:
   a. Country and place (area, region, GIS coordinates, ranch, and/or AND nearest city) where trophy was removed from the wild: All days, Property name Mapungubwe
   b. Date wildlife was hunted: 6-23-2017

c. Description of the trophy and parts you intend to import (e.g., skin, skull, shoulder mount, life size mount, claws, horn, tusks): 2 - 4-feet and tail - 2 Ears

d. The current location of the trophy (address and country) [the U.S. import permit will identify this country as the country of export/re-export and must match with the export/re-export document]:
PLOT 114, BASHEWA P.O BOX 11526
Tigerport, Pretoria 0056 South Africa

4. Complete name and address of overseas person or business shipping the trophy to you. If you are applying to import a trophy directly from Namibia, you **must** provide the name and address of the professional hunter listed on your Namibian hunting permit [this name will appear on the face of the export permit].

Name: Rupert DEDEKIND
Business Name: Universal Trophy Services
Address: PLOT 114, BASHEWA
Address: P.O Box 11526
City: TIGERPORT, PRETORIA 0056
State/Province:
Country, Postal Code: South AFRICA

5. Please be aware that the U.S. Fish and Wildlife Service may need to make a finding that your activities will enhance or benefit wild populations of the species involved. If you have any information that could support this finding (e.g., how the funds from license/trophy fees will be spent, what portion of the hunting fee will support conservation), please submit such information on a separate page with your application.

CERTIFICATION STATEMENT (original signature must be provided for either 6 or 7 below)

6. **If you are a broker or taxidermist applying on behalf of a foreign national,** provide documentation to show you have a **Power of Attorney** to act on your client's behalf and sign the following statement.

I acknowledge that the sport-hunted trophy/trophies to be imported has been/will be personally hunted by my client and is being imported only for my client's personal use (i.e., **not for sale, transfer, donation, or exchange that is reasonably likely to result in economic use, gain, or benefit**). I understand that my client may only import two leopard trophies in one calendar year (if applicable). In addition, I have advised my client that raw ivory, once imported into the United States, cannot be re-exported.

Taxidermist/Broker's signature: _____ Date: _____

7. **If you are the hunter applying to import your own trophy**, please read and sign the following statement.

I acknowledge that the sport-hunted trophy/trophies to be imported has been/will be personally hunted by me and is being imported only for my personal use (i.e., **not for sale, transfer, donation, or exchange that is reasonably likely to result in economic use, gain, or benefit**). I understand that I may only import two leopard trophies in one calendar year (if applicable). In addition, I understand that raw ivory, once imported into the United States, cannot be re-exported.

Applicant's signature: _____ Date: 12/15/2017

Be aware that there may be additional permitting or approval requirements by your local or state governments, as well as required by other Federal agencies or foreign government to conduct your propose activity. While the Service will attempt to assist where possible, it is your responsibility to obtain such approval.

8. All international shipment(s) must be through a designated port. A list of designated ports (where an inspector is posted) is available from http://www.fws.gov/le/designated-ports.html. If you wish to use a port not listed, please contact the Office of Law Enforcement for a Designated Port Exemption Permit (form 3-200-2).

Catherine Cockey, Wildlife Inspector 410-694-9590
BWI Air Cargo Complex
Building F, Suite 1500 Baltimore MD 21240

9. Name and address where you wish the permit to be mailed, if different from page 1 (All permits will be mailed via the U.S. Postal Service, unless you identify an alternative means below):

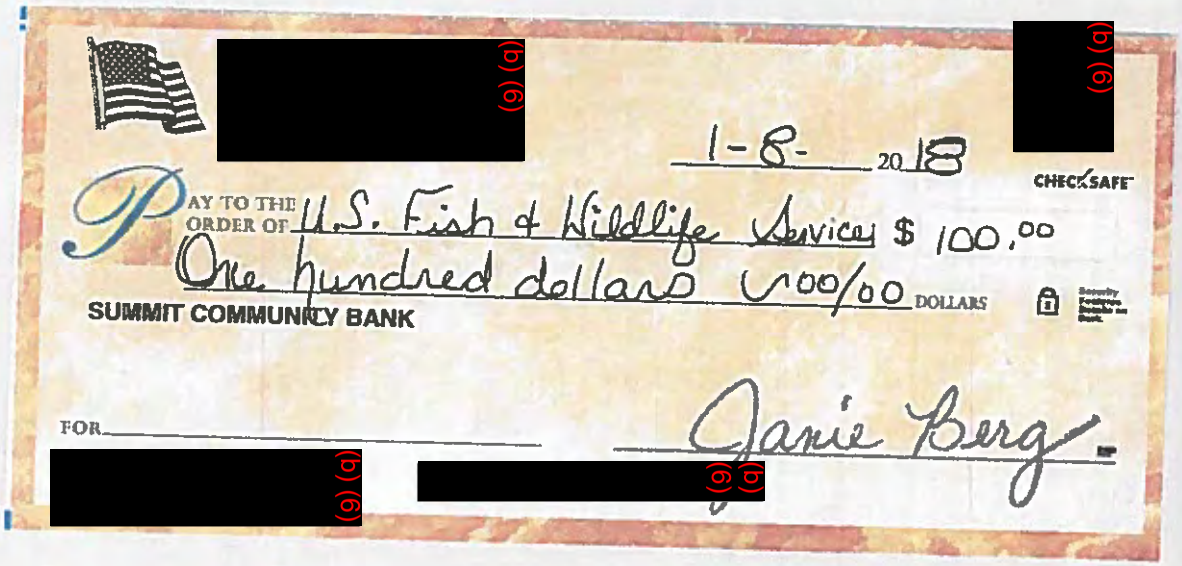
10. If you wish the permit to be delivered by means other than USPS regular mail, provide an air bill, pre-paid envelope, or billing information. If you do not have a pre-paid envelope or air bill and wish to pay for a courier service with your credit card, please check the box below. Please DO NOT include credit card number or other information; you will be contacted for this information.

☐ If a permit is issued, please send it via a courier service to the address on page 1 or question 9. I understand that you will contact me for my credit card information once the application has been processed.

11. Who should we contact if we have questions about the application? (Include name, phone number, and email):

12. **Disqualification Factor.** A conviction, or entry of a plea of guilty or nolo contendere, for a felony violation of the Lacey Act, the Migratory Bird Treaty Act, or the Bald and Golden Eagle Protection Act disqualifies any such person from receiving or exercising the privileges of a permit, unless such disqualification has been expressly waived by the Service Director in response to a written petition. (50 CFR 13.21(c)) Have you or any of the owners of the business, if applying as a business, been convicted, or entered a plea of guilty or nolo contendere, forfeited collateral, or are currently under charges for any violations of the laws mentioned above?

☐ Yes ☑ No If you answered "Yes" provide: a) the individual's name, b) date of charge, c) charge(s), d) location of incident, e) court, and f) action taken for each violation.



[redacted] (b) (6)

[redacted] (b) (6)

1-8- 2018

CHECKSAFE

PAY TO THE ORDER OF U.S. Fish & Wildlife Services $ 100.00

One hundred dollars 00/00 DOLLARS

SUMMIT COMMUNITY BANK

FOR [redacted] (b) (6)

Janie Berg

[redacted] (b) (6)

Form 3-200-20

OMB Control No. 1018-0093
Expires 08/31/2020

RCVD MAR 16 2018

LB

Department of Interior
U.S. Fish and Wildlife Service
Federal Fish and Wildlife Permit Application Form

U.S. Fish and Wildlife Service
Division of Management Authority
Branch of Permits, MS: IA
5275 Leesburg Pike
Falls Church, VA 22041-3803
1-800-358-2104 or 703-358-2104

Type of Activity

IMPORT OF SPORT-HUNTED TROPHIES (Appendix I of CITES and/or ESA)

Complete Sections A or B, and C, D, and E of this application. U.S. address may be required in Section C, see instructions for details.
You may find instructions on how to make your application complete and help avoid unnecessary delays at the following link: .

Section A: Complete if applying as an individual

1.a Last Name	1.b First Name	1.c. Middle Name/Initial	1.d. Suffix
Lott	John	(b) (6)	

2. Date of Birth (mm/dd/yyyy)	3. Telephone Number	3.a. Alternate Telephone Number	4. E-mail address
(b) (6)			

Section B: Complete if applying on behalf of a business, corporation, public agency, Tribe, or institution

1.a. Name of business, agency, Tribe, or institution		1.b. Doing business as (DBA)	
2. Tax Identification no.		3. Description of business, agency, Tribe, or institution	
4.a. Principal officer Last name	4.b. Principal officer First Name	4.c. Principal officer Middle name/initial	4.d. Suffix
5. Principal officer title	6. Primary contact name		
7.a. Business telephone number	7.b. Alternate telephone number	7.c. Business fax number	7.d. Business e-mail address

Section C: All applicants complete address information

1.a. Physical address (Street address; Apartment #, Suite #, or Room #; no P.O. Boxes)				
(b) (6)				
1.b. City	1.c. State	1.d. Zip code/Postal code	1.e. County/Province	1.f. Country
Aspers	PA	(b) (6)		USA

2.a. Mailing address (include if different than physical address, include name of contact person if applicable)				
2.b. City	2.c. State	2.d. Zip code/Postal code	2.e. County/Province	2.f. Country

Section D: All applicants MUST complete

1. Attach check or money order payable to the U.S. FISH AND WILDLIFE SERVICE **in the amount identified on page 2, nonrefundable processing fee.** Federal, Tribal, State, and local government agencies, and those acting on behalf of such agencies, are exempt from the processing fee – *attach documentation of fee exempt status as outlined in instructions.* [50 CFR 13.11(d)]

2. Certification: I hereby certify that I have read and am familiar with the regulations contained in ***Title 50 Part 13 of the Code of Federal Regulations*** and the other ***applicable parts in subchapter B of Chapter I of Title 50***, and I certify that the information submitted in this application for a permit is complete and accurate to the best of my knowledge and belief. I understand that any false statement herein may subject me to the criminal penalties of 18 U.S.C. 1001.

Signature of applicant/Principal Officer for permit (No photocopied or stamped signatures) Date of signature (mm/dd/yyyy)

Joel (b) (6) Lott 03/14/2018

Please continue to next page

E. IMPORT OF SPORT-HUNTED TROPHIES *(Appendix I of CITES and/or ESA)*

Note 1: This form should be used to request authorization to import trophies of species listed on Appendix I of CITES and/or as threatened or endangered under the ESA (examples include elephants, lions, cheetahs, wood bison, and markhor).

PLEASE USE FORM 3-200-19 FOR SOUTHERN AFRICAN LEOPARD TROPHIES AND SOUTHERN WHITE RHINOCEROS TROPHIES TAKEN IN NAMIBIA.

Note 2: If you hold an import permit for trophy/trophies that you did not use, please **return the unused original permit**. If you are requesting reissuance of a permit because you have taken a trophy, but were unable to import it prior to the expiration of the permit, please use the renewal form (3-200-52) and return your original permit with that form.

Note 3: Applications for species listed as endangered under the U.S. Endangered Species Act are published in the Federal Register for a 30-day public comment period. Please allow at least **90 days** for the application to be processed.

Note 4: *Sport-hunted trophy* is defined at 50 CFR 23.74 as follows: *Sport-hunted trophy* means a whole dead animal or a readily recognizable part or derivative of an animal specifically identified on the accompanying CITES document that meets the following criteria:

- Is raw, processed, or manufactured;
- Was legally obtained by the hunter through hunting for his or her personal use;
- Is being imported, exported, or re-exported by or on behalf of the hunter as part of the transfer from its country of origin ultimately to the hunter's country of usual residence; and
- Includes worked, manufactured, or handicraft items made from the sport-hunted animal only when:
  - i. Such items are contained in the same shipment as raw or tanned parts of the sport-hunted animal and are for the personal use of the hunter;
  - ii. The quantity of such items is no more than could reasonably be expected given the number of animals taken by the hunter as shown on the license or other documentation of the authorized hunt accompanying the shipment; and
  - iii. The accompanying CITES documents (export document and, if appropriate, import permit) contain a complete itemization and description of all items included in the shipment.

Note 5: Certain hunting trophies, including elephants, are subject to restrictions on their use after import into the United States. Please see 50 CFR 23.55 for more information or contact the Division of Management Authority.

Please provide the following information. Complete all questions on the application. Mark questions that are not applicable with "N/A". If needed, use a separate sheet of paper. On all attachments or separate sheets you are submitting; please indicate the application question number you are addressing. If applying for more than one trophy, be sure to answer questions 1-6 for each trophy addressed in this application. If importing trophies from more than one country, you must submit a separate application for each shipment in order to obtain separate import permits.

1. Name and address where you wish the permit to be mailed, if different from page 1. If you would like expedited shipping, please enclose a self-addressed, pre-paid, computer-generated, courier service airway bill. If unspecified, all documents will be mailed via the U.S. Postal Service.

   same

2. Who should we contact if we have questions about the application (name, phone number, and e-mail)?

   John (b) Lott (b) (6) [redacted]

3. Have you or your client (if a broker applying on behalf of your client), been assessed a civil penalty or convicted of any criminal provision of any statute or regulation relating to the activity for which the application is filed; been convicted, or entered a plea of guilty or nolo contendere, for a felony violation of the Lacey Act, the Migratory Bird Treaty Act, or the Bald and Golden Eagle Protection Act; forfeited collateral; OR are currently under charges for any violation of the laws mentioned above?

XXXX XXXX Yes

If you answered "Yes" to Question 3, provide: a) the individual's name; b) date of charge; c) charge(s); d) location of incident; e) court, and f) action taken for each violation. Please be aware that a "Yes" response does not automatically disqualify you from getting a permit.

4. For each trophy to be imported, provide:

   a. Scientific name (genus, species, and, if applicable, subspecies) and common name. Loxodonta Africana African elephant

   b. Sex (if known). Male

5. **IF ANIMAL IS CURRENTLY LIVING IN THE WILD**, please enter the following information:

   a. Country and place (area, region, GIS coordinates, ranch, conservancy, management area, or hunting block, AND nearest city) where wildlife is to be taken from the wild:

   NA

   b. Date wildlife is to be hunted:

   NA

   c. Name of hunting outfitter, safari company, or professional hunter you will be hunting with:

   NA

6. IF THE TROPHY HAS ALREADY BEEN TAKEN, please enter the following:

   a. Country and place (area, region, GIS coordinates, ranch, conservancy, management area, or hunting block, AND nearest city) where trophy was removed from the wild:

   country NAMIBIA, place Dzoti Conservancy, Zambezi Region(Conservancy Office GIS coord. S18 16'48.97"/E23 47'42.93")
   nearest city Katima Mulilo GIS coord.: S 18 19'33.45" / E 23 43'14.05"

   b. Date wildlife was hunted:

   September 10, 2017

c. Name of hunting outfitter, safari company, or professional hunter you hunted with:

outfitter : Ondjou Safaris cc
Professional Hunter : Barend Hendrik van Heerden

d. The current location of the trophy (address and country) [the U.S. import permit will identify this country as the country of export/re-export and must match with the export/re-export document]:

Postal Address: P.O. Box 21068 Windhoek, NAMIBIA
Residential address: Kappsfarm,Plot # 16, Khomas Region, NAMIBIA

7. Please provide a copy of any applicable foreign government permits or licenses that were required to remove this animal from the wild (if you have not hunted yet and do not currently hold any such permits or licenses, please indicate so). see attachments

8. Complete name and address of overseas person or business shipping the trophy to you. If you are applying to import a trophy directly from Namibia, you must provide the name and address of the professional hunter listed on your Namibian hunting permit [this name will appear on the face of the export permit].

Name: Barend Hendrick van Heerden
Business Name: Ondjou Safaris cc
Address: P.O. Box 30208 Pionierspark,Windhoek, NAMIBIA / residential(office) Farm Augeigas # 34 Portion of Plot 17
City: Windhoek
State/Province: Khomas Region
Country, Postal Code: NAMIBIA

9. For species listed under the Endangered Species Act, please be aware that the U.S. Fish and Wildlife Service must make a finding that your activities will enhance or benefit wild populations of the species involved. While we will communicate with the range country for the species you will hunt or hunted when making the required findings, if you have any information that could support this finding, it would be helpful to our review if you could provide it. Please submit such information on a separate page with your application.

a. Do you have any information regarding the population status or trend data on the species hunted? yes
regional game counts taken twice yearly. For Dzoti the first game counts were done in 2010 and ever since two per year.
The game guards have monthly patrols were game encountered are recorded and the population trend is stable. I encountered several different herds of thirty plus elephants.

b. In order to hunt, you likely paid for licenses or trophy fees. What were those fees and do you have any information on how those funds were used by either the landowner, community, or government?
Daily rate total USD 24,000, trophy fee elephant USD 28,000. Yes, a big portion of the funds were used for conservancy,staff,salaries, anti-poaching effort(transport,wages,etc.),drill multiple wells(waterholes) for wildlife as well for the community, supporting local schools, soccer and sports teams, and the funding of the local game guards

c. Do you have information on other funding activities that are being carried out, or were carried out, by the safari outfitter, professional hunter, concession holder, or land owner that provide a conservation benefit to the species being hunted/species hunted
yes, they made donations toward carnivore zensus in the region, constant support and donation towards ongoing research in the region and enviormental awareness campaigns at the local schools (see pictures)

CERTIFICATION STATEMENT (original signature must be provided for either 10 or 11 below)

10. If you are a broker or taxidermist applying on behalf of a U.S. hunter or foreign national, provide documentation to show you have a Power of Attorney to act on your client's behalf and sign the following statement.

I acknowledge that the sport-hunted trophy/trophies to be imported has been/will be personally hunted by my client and is being imported only for my client's personal use (i.e., not for sale, transfer, donation, or exchange that is reasonably likely to result in economic use, gain, or benefit). If applying for the import of a leopard trophy, I understand that my client may only import two leopard trophies in one calendar year.

Taxidermist/Broker's signature: NA Date: _____

11. If you are the hunter applying to import your own trophy, please read and sign the following statement.

I acknowledge that the sport-hunted trophy/trophies to be imported has been/will be personally hunted by me and is being imported only for my personal use (i.e., not for sale, transfer, donation, or exchange that is reasonably likely to result in economic use, gain, or benefit). If applying to import a leopard trophy, I understand that I may only import two leopard trophies in one calendar year.

Applicant's signature: (b)(6) Date: 3-14-2018

Be aware that there may be additional permitting or approval requirements by your local or state governments, as well as required by other Federal agencies or foreign government to conduct your propose activity. While the Service will attempt to assist where possible, it is your responsibility to obtain such approval.

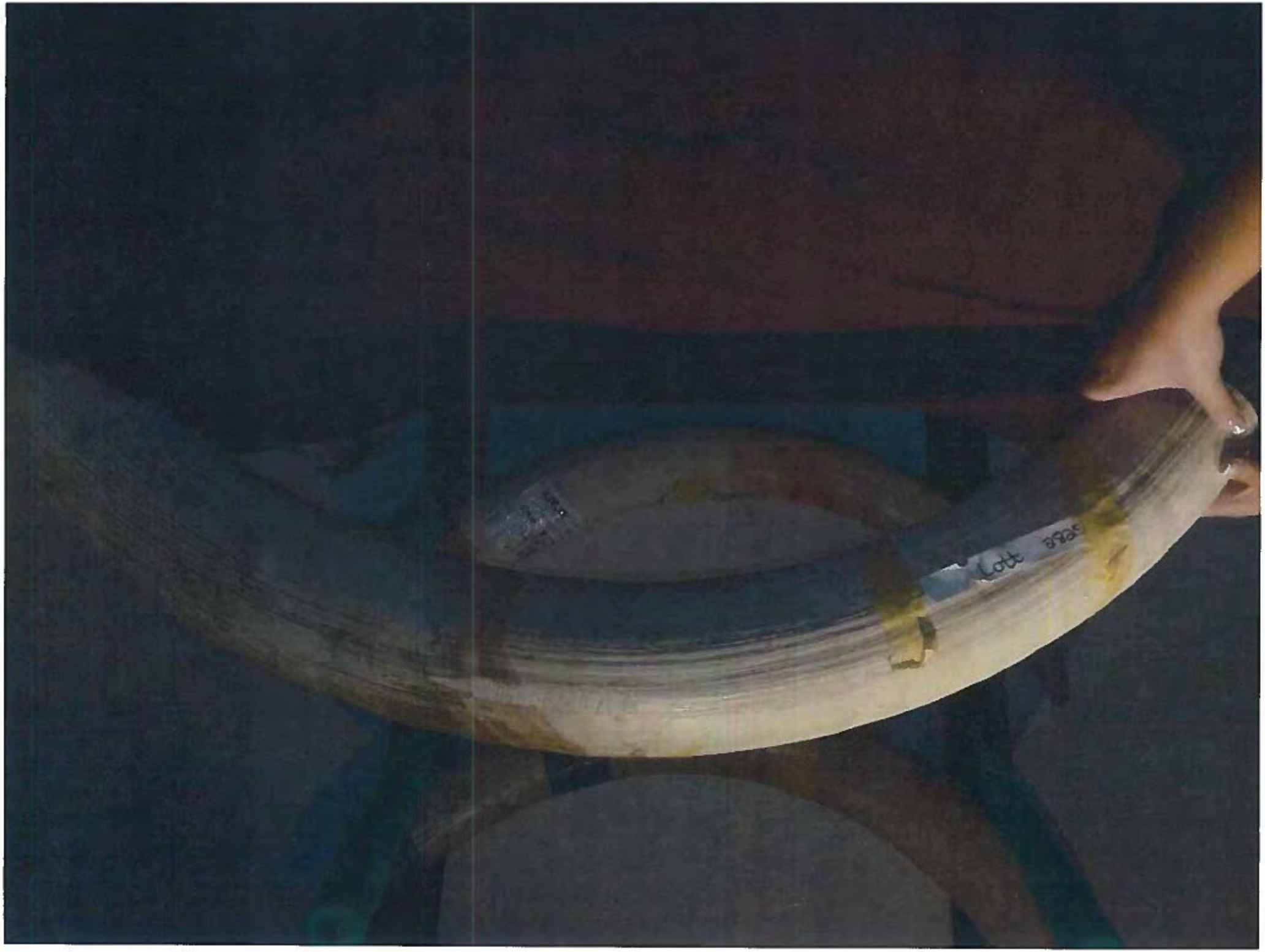
12. All international shipment(s) must be through a designated port. A list of designated ports (where an inspector is posted) is available from **the list of designated ports**. If you wish to use a port not listed, please contact the Office of Law Enforcement for a Designated Port Exemption Permit (form 3-200-2).

following certificate must be completed immediately after each animal that has been hunted (please print)

Date	Species	LH*	RH*	LB*	RB*	Total	RW*	Age	Male Female	Farm		Farm owner	Hunter	Professional hunt Master hunting gu Hunting guide
										Name	No			
9/2017	Elephat							50	♂	Dzoti Conservancy				
		Reported:				11/09/2017				08H25		Rivelda.		

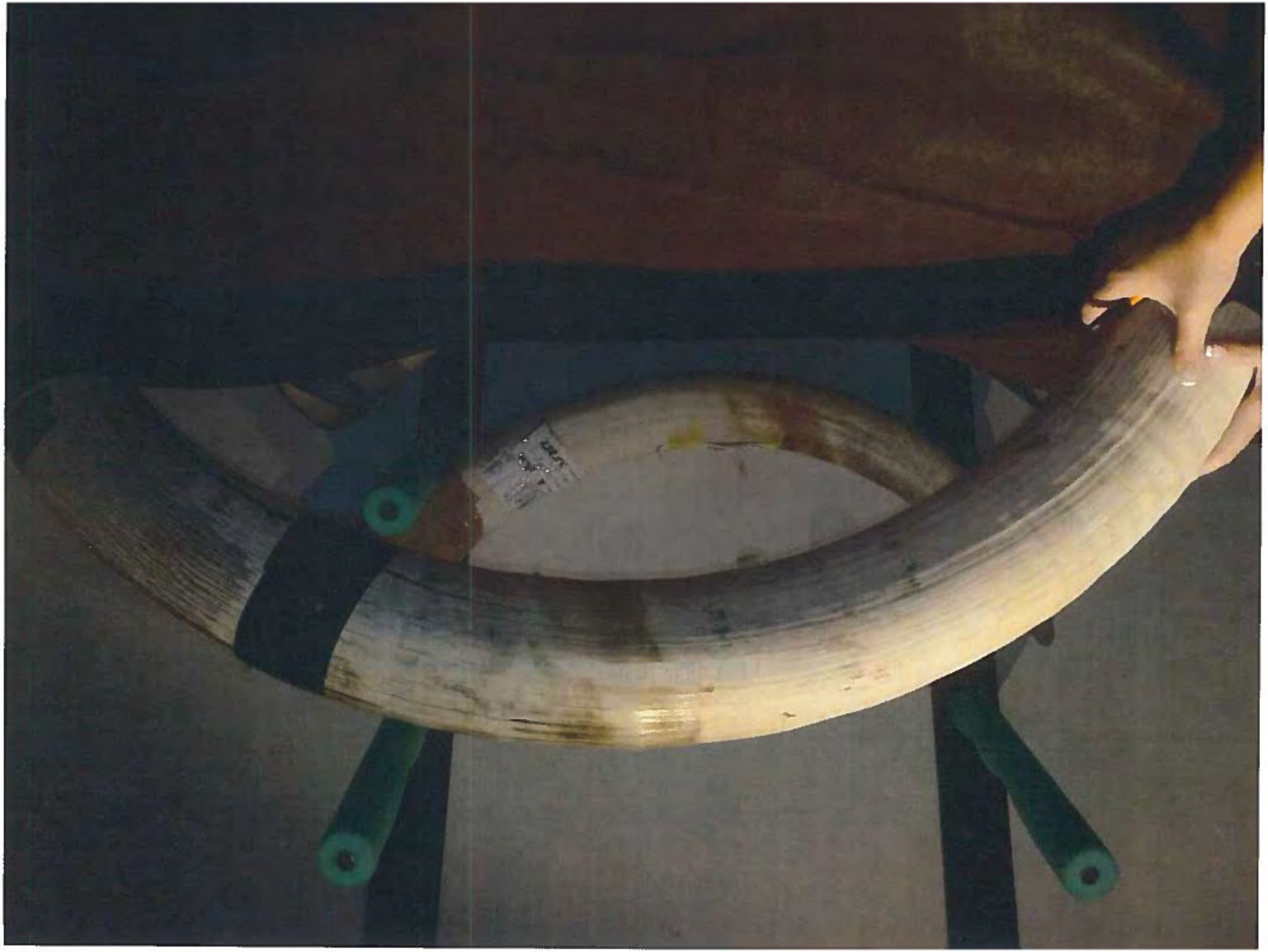
aft, R=Right, H=Horn, B=Base, RW=Rowland Ward
ophy hunter may hunt unless accompanied by a professional hunter,, master hunting guide or hunting guide.
permit must be kept on the person of the permit-holder at all times while hunting.
guide(s) as specified on the permit ma conduct the hunt.

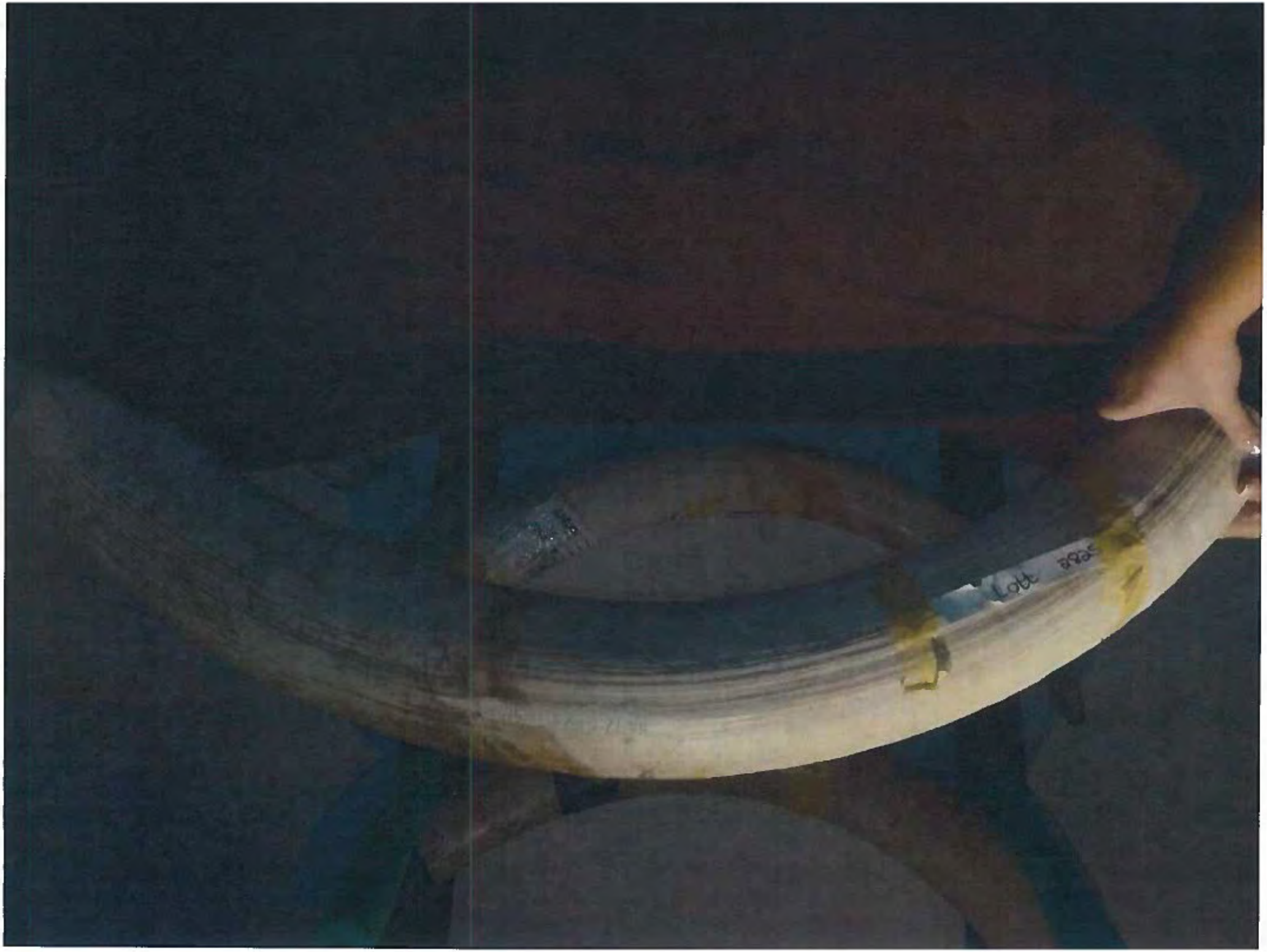
(6) (b)
(6) (b)



NA 17 0029 1650

NA 17 0030 1890





Department of the Interior
U.S. Fish and Wildlife Service

OMB No. 1018-0184
Expires 11/30/2016

Federal Fish and Wildlife Permit Application Form

01/09/2018

Return to: U.S. Fish and Wildlife Service
Division of Management Authority (DMA)
Branch of Permits, MS: IA
5275 Leesburg Pike
Falls Church, VA 22041-3803
1-800-358-2104 or 703-358-2104

Type of Activity:
Import of Sport-hunted Trophies of Southern African Leopard, African Elephant, and Namibian Southern White Rhinoceros

B

RCVD JAN 17 2018

Complete Sections A or B, and C, D, and E of this application. U.S. address may be required in Section C, see instructions for details.
See attached instruction pages for information on how to make your application complete and help avoid unnecessary delays.

A. Complete if applying as an individual

1.a. Last name	1.b. First name	1.c. Middle name or initial	1.d. Suffix
Campagna	Jeffrey	(b) (6)	

2. Date of birth (mm/dd/yyyy)	3. Occupation	4. Affiliation/ Doing business as (see instr
(b) (6)		

5.a. Telephone number	5.b. Alternate telephone number	5.c. Fax number	5.d. E-mail address
(b) (6)			(b) (6)

B. Complete if applying on behalf of a business, corporation, public agency, Tribe, or institution

1.a. Name of business, agency, Tribe, or institution	1.b. Doing business as (dba)

2. Tax identification no.	3. Description of business, agency, Tribe, or institution

4.a. Principal officer Last name	4.b. Principal officer First name	4.c. Principal officer Middle name/ initial	4.d. Suffix

5. Principal officer title	6. Primary contact name

7.a. Business telephone number	7.b. Alternate telephone number	7.c. Business fax number	7.d. Business e-mail address

C. All applicants complete address information

1.a. Physical address (Street address; Apartment #, Suite #, or Room #; no P.O. Boxes)
(b) (6)

1.b. City	1.c. State	1.d. Zip code/Postal code:	1.e. County/Province	1.f. Country
Moline	IL	(b) (6)		USA

2.a. Mailing Address (include if different than physical address; include name of contact person if applicable)
same

2.b. City	2.c. State	2.d. Zip code/Postal code:	2.e. County/Province	2.f. Country

D. All applicants MUST complete

1. Attach check or money order payable to the U.S. FISH AND WILDLIFE SERVICE **in the amount of $100, nonrefundable processing fee**. Federal, Tribal, State, and local government agencies, and those acting on behalf of such agencies, are exempt from the processing fee – ***attach documentation of fee exempt status as outlined in instructions.*** (50 CFR 13.11(d))

2. Do you currently have or have you ever had any Federal Fish and Wildlife permits?
Yes ☐ If yes, list the number of the most current permit you have held or that you are applying to renew/re-issue:_____ No ☑

3. Certification: I hereby certify that I have read and am familiar with the regulations contained in ***Title 50, Part 13 of the Code of Federal Regulations*** and the other ***applicable parts in subchapter B of Chapter I of Title 50***, and I certify that the information submitted in this application for a permit is complete and accurate to the best of my knowledge and belief. I understand that any false statement herein may subject me to the criminal penalties of 18 U.S.C. 1001.

Signature of applicant/person responsible for permit (No photocopied or stamped signatures) — Date of signature (mm/dd/yyyy): 1-9-18

Please continue to next page

E. IMPORT OF SPORT-HUNTED TROPHIES OF SOUTHERN AFRICAN LEOPARD, AFRICAN ELEPHANT, AND NAMIBIAN SOUTHERN WHITE RHINOCEROS

Note 1: If you hold an import permit for a trophy/trophies that you did not use, please **return the unused original permit.** If you are requesting reissuance of a permit because you have taken a trophy, but were unable to import it prior to the expiration of the permit, please use the renewal form (3-200-52; http://www.fws.gov/international/permits/by-form-number/index.html) and return your original permit with that form.

Note 2: *Sport-hunted trophy* is defined at 50 CFR 23.74 as follows: *Sport-hunted trophy* means a whole dead animal or a readily recognizable part or derivative of an animal specifically identified on the accompanying CITES document that meets the following criteria:

(1) Is raw, processed, or manufactured;
(2) Was legally obtained by the hunter through hunting for his or her personal use;
(3) Is being imported, exported, or re-exported by or on behalf of the hunter as part of the transfer from its country of origin ultimately to the hunter's country of usual residence; and
(4) Includes worked, manufactured, or handicraft items made from the sport-hunted animal only when:
(i) Such items are contained in the same shipment as raw or tanned parts of the sport-hunted animal and are for the personal use of the hunter;
(ii) The quantity of such items is no more than could reasonably be expected given the number of animals taken by the hunter as shown on the license or other documentation of the authorized hunt accompanying the shipment; and
(iii) The accompanying CITES documents (export document and, if appropriate, import permit) contain a complete itemization and description of all items included in the shipment.

Note 3: Certain hunting trophies, including leopard, elephant, and rhinoceros hunting trophies, are subject to restrictions on their use after import into the United States. Please see 50 CFR 23.55 for more information or contact the Division of Management Authority.

Please provide the following information. Complete all questions on the application. Mark questions that are not applicable with "N/A". If applying for more than one trophy, be sure to answer questions 2 and 3 for each trophy.

If importing trophies from more than one country, you must submit a separate application for each shipment in order to obtain separate import permits.

1. ENTER the quantity next to the name of the species you are applying to import (you may apply to import specimens of more than one species provided they have been/are being hunted in the same country):

Leopard (*Panthera pardus*) Quantity:_____(Import is limited to two per hunter per calendar year)

African elephant (*Loxodonta africana*) Quantity:__1__(Import is limited to two per hunter per calendar year)
Note: once imported, ivory cannot be re-exported.

Southern white rhinoceros (*Ceratotherium simum simum*) from Namibia Quantity:_____ (An import permit is not required for trophies harvested in South Africa or Swaziland. If you wish to import from a different country, please use form 3-200-37).

2. **IF ANIMAL IS CURRENTLY LIVING IN THE WILD,** please enter the following:
   a. Country and place (area, region, GIS coordinates, ranch AND nearest city) where wildlife is to be taken from the wild:

   b. Date wildlife is to be hunted:

c. Description of the trophy and parts you intend to import (e.g., skin, skull, shoulder mount, life size mount, claws, horns, tusks).

3. **IF THE ANIMAL IS DEAD**, please enter the following:
   a. Country and place (area, region, GIS coordinates, ranch, and/or AND nearest city) where trophy was removed from the wild:

   b. Date wildlife was hunted: Zimbabwe, South-East, Masvingo Province, 21,29'53 S"/30,47'02 E", Nuanetsi Ranch, Masvingo
   July 03, 2014
   c. Description of the trophy and parts you intend to import (e.g., skin, skull, shoulder mount, life size mount, claws, horn, tusks):

      2 Tusks, 2 Panels, 2 Feet, 1 Tail, 2 Ears

   d. The current location of the trophy (address and country) [the U.S. import permit will identify this country as the country of export/re-export and must match with the export/re-export document]:

      733 Iona Close, Harare, Borrowdale, BW957, Zimbabwe

4. Complete name and address of overseas person or business shipping the trophy to you. If you are applying to import a trophy directly from Namibia, you **must** provide the name and address of the professional hunter listed on your Namibian hunting permit [this name will appear on the face of the export permit].

Name: Business	Safari Air Services
Name: Address:	
Address:	733 Iona Close
City:	Harare
State/Province:	Borrowdale
Country, Postal Code:	BW957 Zimbabwe

5. Please be aware that the U.S. Fish and Wildlife Service may need to make a finding that your activities will enhance or benefit wild populations of the species involved. If you have any information that could support this finding (e.g., how the funds from license/trophy fees will be spent, what portion of the hunting fee will support conservation), please submit such information on a separate page with your application.

CERTIFICATION STATEMENT (original signature must be provided for either 6 or 7 below)

6. **If you are a broker or taxidermist applying on behalf of a foreign national,** provide documentation to show you have a **Power of Attorney** to act on your client's behalf and sign the following statement.

   I acknowledge that the sport-hunted trophy/trophies to be imported has been/will be personally hunted by my client and is being imported only for my client's personal use (i.e., **not for sale, transfer, donation, or exchange that is reasonably likely to result in economic use, gain, or benefit**). I understand that my client may only import two leopard trophies in one calendar year. I understand that my client may only import two African elephant trophies in one calendar year. In addition, I have advised my client that raw ivory, once imported into the United States, cannot be re-exported.

   Taxidermist/Broker's signature:_____ Date: _____

7. **If you are the hunter applying to import your own trophy,** please read and sign the following statement.

I acknowledge that the sport-hunted trophy/trophies to be imported has been/will be personally hunted by me and is being imported only for my personal use (i.e., **not for sale, transfer, donation, or exchange that is reasonably likely to result in economic use, gain, or benefit**). I understand that I may only import two leopard trophies in one calendar year. I understand that I may only import two African elephant trophies in one calendar year. In addition, I understand that raw ivory, once imported into the United States, cannot be re-exported.

Applicant's signature: Date: 1-9-18

Be aware that there may be additional permitting or approval requirements by your local or state governments, as well as required by other Federal agencies or foreign government to conduct your propose activity. While the Service will attempt to assist where possible, it is your responsibility to obtain such approval.

8. All international shipment(s) must be through a designated port. A list of designated ports (where an inspector is posted) is available from http://www.fws.gov/le/designated-ports.html. If you wish to use a port not listed, please contact the Office of Law Enforcement for a Designated Port Exemption Permit (form 3-200-2).

9. Name and address where you wish the permit to be mailed, if different from page 1 (All permits will be mailed via the U.S. Postal Service, unless you identify an alternative means below):

10. If you wish the permit to be delivered by means other than USPS regular mail, provide an air bill, pre-paid envelope, or billing information. If you do not have a pre-paid envelope or air bill and wish to pay for a courier service with your credit card, please check the box below. Please DO NOT include credit card number or other information; you will be contacted for this information.

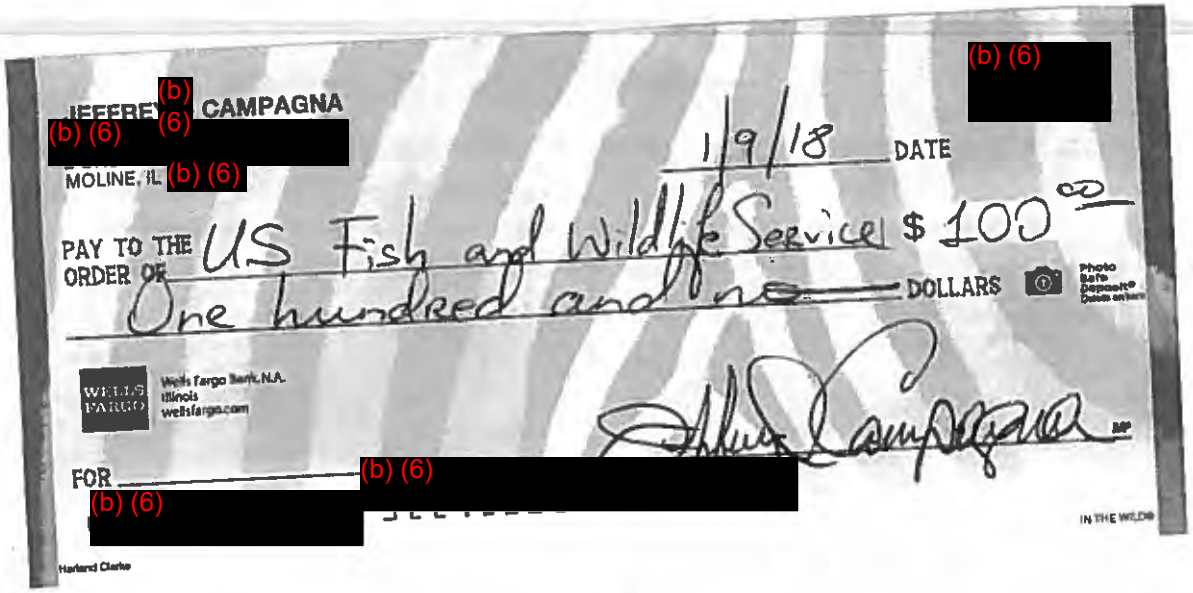
☐ If a permit is issued, please send it via a courier service to the address on page 1 or question 9. I understand that you will contact me for my credit card information once the application has been processed.

11. Who should we contact if we have questions about the application? (Include name, phone number, and email):

Jeff Campagna (b) (6)

12. **Disqualification Factor**. A conviction, or entry of a plea of guilty or nolo contendere, for a felony violation of the Lacey Act, the Migratory Bird Treaty Act, or the Bald and Golden Eagle Protection Act disqualifies any such person from receiving or exercising the privileges of a permit, unless such disqualification has been expressly waived by the Service Director in response to a written petition. (50 CFR 13.21(c)) Have you or any of the owners of the business, if applying as a business, been convicted, or entered a plea of guilty or nolo contendere, forfeited collateral, or are currently under charges for any violations of the laws mentioned above?

☐ Yes ☑ No If you answered "Yes" provide: a) the individual's name, b) date of charge, c) charge(s), d) location of incident, e) court, and f) action taken for each violation.


(b) (6)
JEFFREY CAMPAGNA
(b) (6)
MOLINE, IL (b) (6)
1/9/18 DATE
PAY TO THE ORDER OF US Fish and Wildlife Service $ 100 00
One hundred and no DOLLARS
Photo Safe Deposit Details on Back
WELLS FARGO
Wells Fargo Bank, N.A.
Illinois
wellsfargo.com
FOR (b) (6)
(b) (6)
Harland Clarke

Department of the Interior
U.S. Fish and Wildlife Service

OMB No. 1018-0164
Expires 11/30/2016

Federal Fish and Wildlife Permit Application Form

RCVD FEB 21 2018

RCVD FEB 21 2018

LB

Return to: U.S. Fish and Wildlife Service
Division of Management Authority (DMA)
Branch of Permits, MS: IA
5275 Leesburg Pike
Falls Church, VA 22041-3803
1-800-358-2104 or 703-358-2104

Type of Activity:
Import of Sport-hunted Trophies of
Southern African Leopard, African Elephant, and
Namibian Southern White Rhinoceros

Complete Sections A or B, and C, D, and E of this application. U.S. address may be required in Section C, see instructions for details.
See attached instruction pages for information on how to make your application complete and help avoid unnecessary delays.

A. Complete if applying as an individual

1.a. Last name	1.b. First name	1.c. Middle name or initial	1.d. Suffix
Wickas	Louis	(b) (6)	(b) (6)

2. Date of birth (mm/dd/yyyy)	3. Occupation	4. Affiliation/ Doing business as (see instructions)
(b) (6)		

5.a. Telephone number	5.b. Alternate telephone number	5.c. Fax number	5.d. E-mail address
(b) (6)		N/A	(b) (6)

B. Complete if applying on behalf of a business, corporation, public agency, Tribe, or institution

1.a. Name of business, agency, Tribe, or institution	1.b. Doing business as (dba)

2. Tax identification no.	3. Description of business, agency, Tribe, or institution

4.a. Principal officer Last name	4.b. Principal officer First name	4.c. Principal officer Middle name/ initial	4.d. Suffix

5. Principal officer title	6. Primary contact name

7.a. Business telephone number	7.b. Alternate telephone number	7.c. Business fax number	7.d. Business e-mail address

C. All applicants complete address information

1.a. Physical address (Street address; Apartment #, Suite #, or Room #; no P.O. Boxes)
(b) (6)

1.b. City	1.c. State	1.d. Zip code/Postal code:	1.e. County/Province	1.f. Country
Gallipolis	Ohio	(b) (6)		USA

2.a. Mailing Address (include if different than physical address; include name of contact person if applicable)
Same as Above

2.b. City	2.c. State	2.d. Zip code/Postal code:	2.e. County/Province	2.f. Country

D. All applicants MUST complete

1. Attach check or money order payable to the U.S. FISH AND WILDLIFE SERVICE **in the amount of $100, nonrefundable processing fee** Federal, Tribal, State, and local government agencies, and those acting on behalf of such agencies, are exempt from the processing fee – ***attach documentation of fee exempt status as outlined in instructions.*** (50 CFR 13.11(d))

2. Do you currently have or have you ever had any Federal Fish and Wildlife permits?
Yes ☑ If yes, list the number of the most current permit you have held or that you are applying to renew/re-issue: 17US55820C/9 No ☐

3. Certification: I hereby certify that I have read and am familiar with the regulations contained in ***Title 50, Part 13 of the Code of Federal Regulations*** and the other ***applicable parts in subch[illegible] of Chapter I of Title 50***, and I certify that the information submitted in this application for a permit is complete and accurate to the best of my knowledge a[illegible]. I understand that any false statement herein may subject me to the criminal penalties of 18 U.S.C. 1001.

(b) (6) Louis Wickas — FEB 12, 2018

Signature of applicant/p[illegible]sponsible for permit (No photocopied or stamped signatures) — Date of signature (mm/dd/yyyy)

Please continue to next page

E. IMPORT OF SPORT-HUNTED TROPHIES OF SOUTHERN AFRICAN LEOPARD, AFRICAN ELEPHANT, AND NAMIBIAN SOUTHERN WHITE RHINOCEROS

Note 1: If you hold an import permit for a trophy/trophies that you did not use, please **return the unused original permit.** If you are requesting reissuance of a permit because you have taken a trophy, but were unable to import it prior to the expiration of the permit, please use the renewal form (3-200-52; http://www.fws.gov/international/permits/by-form-number/index.html) and return your original permit with that form.

Note 2: *Sport-hunted trophy* is defined at 50 CFR 23.74 as follows: *Sport-hunted trophy* means a whole dead animal or a readily recognizable part or derivative of an animal specifically identified on the accompanying CITES document that meets the following criteria:

(1) Is raw, processed, or manufactured;
(2) Was legally obtained by the hunter through hunting for his or her personal use;
(3) Is being imported, exported, or re-exported by or on behalf of the hunter as part of the transfer from its country of origin ultimately to the hunter's country of usual residence; and
(4) Includes worked, manufactured, or handicraft items made from the sport-hunted animal only when:
  (i) Such items are contained in the same shipment as raw or tanned parts of the sport-hunted animal and are for the personal use of the hunter;
  (ii) The quantity of such items is no more than could reasonably be expected given the number of animals taken by the hunter as shown on the license or other documentation of the authorized hunt accompanying the shipment; and
  (iii) The accompanying CITES documents (export document and, if appropriate, import permit) contain a complete itemization and description of all items included in the shipment.

Note 3: Certain hunting trophies, including leopard, elephant, and rhinoceros hunting trophies, are subject to restrictions on their use after import into the United States. Please see 50 CFR 23.55 for more information or contact the Division of Management Authority.

Please provide the following information. Complete all questions on the application. Mark questions that are not applicable with "N/A". If applying for more than one trophy, be sure to answer questions 2 and 3 for each trophy.

If importing trophies from more than one country, you must submit a separate application for each shipment in order to obtain separate import permits.

1. ENTER the quantity next to the name of the species you are applying to import (you may apply to import specimens of more than one species provided they have been/are being hunted in the same country):

Leopard (*Panthera pardus*) Quantity: N/A (Import is limited to two per hunter per calendar year)

African elephant (*Loxodonta africana*) Quantity: One (1) (Import is limited to two per hunter per calendar year)
Note: once imported, ivory cannot be re-exported.

Southern white rhinoceros (*Ceratotherium simum simum*) from Namibia Quantity: N/A (An import permit is not required for trophies harvested in South Africa or Swaziland. If you wish to import from a different country, please use form 3-200-37).

2. **IF ANIMAL IS CURRENTLY LIVING IN THE WILD,** please enter the following:
   a. Country and place (area, region, GIS coordinates, ranch AND nearest city) where wildlife is to be taken from the wild:

   Sentinel Limpopo Safaris, Wape Ranch, Mwenezi, Masvingo Province, Zimbabwe
   21°59'13.25"S, 30°53'37.13"E

   b. Date wildlife is to be hunted:

   September 14, 2018-September 28, 2018

c. Description of the trophy and parts you intend to import (e.g., skin, skull, shoulder mount, life size mount, claws, horns, tusks).

Tusks, Hide, Ears, Skull

3. **IF THE ANIMAL IS DEAD**, please enter the following:
   a. Country and place (area, region, GIS coordinates, ranch, and/or AND nearest city) where trophy was removed from the wild:

   b. Date wildlife was hunted: N/A

   c. Description of the trophy and parts you intend to import (e.g., skin, skull, shoulder mount, life size mount, claws, horn, tusks):

   N/A

   d. The current location of the trophy (address and country) [the U.S. import permit will identify this country as the country of export/re-export and must match with the export/re-export document]:

   N/A

4. Complete name and address of overseas person or business shipping the trophy to you. If you are applying to import a trophy directly from Namibia, you **must** provide the name and address of the professional hunter listed on your Namibian hunting permit [this name will appear on the face of the export permit].

Name: Business	Collett's Wildlife Artistry
Name: Address:	15 Josiah Chinamano Road
Address:	
City:	Bulawayo
State/Province:	Belmont
Country, Postal Code:	Zimbabwe

5. Please be aware that the U.S. Fish and Wildlife Service may need to make a finding that your activities will enhance or benefit wild populations of the species involved. If you have any information that could support this finding (e.g., how the funds from license/trophy fees will be spent, what portion of the hunting fee will support conservation), please submit such information on a separate page with your application.

CERTIFICATION STATEMENT (original signature must be provided for either 6 or 7 below)

6. **If you are a broker or taxidermist applying on behalf of a foreign national,** provide documentation to show you have a **Power of Attorney** to act on your client's behalf and sign the following statement.

   I acknowledge that the sport-hunted trophy/trophies to be imported has been/will be personally hunted by my client and is being imported only for my client's personal use (i.e., **not for sale, transfer, donation, or exchange that is reasonably likely to result in economic use, gain, or benefit**). I understand that my client may only import two leopard trophies in one calendar year. I understand that my client may only import two African elephant trophies in one calendar year. In addition, I have advised my client that raw ivory, once imported into the United States, cannot be re-exported.

   Taxidermist/Broker's signature:_____ Date: _____

7. **If you are the hunter applying to import your own trophy**, please read and sign the following statement.

I acknowledge that the sport-hunted trophy/trophies to be imported has been/will be personally hunted by me and is being imported only for my personal use (i.e., **not for sale, transfer, donation, or exchange that is reasonably likely to result in economic use, gain, or benefit**). I understand that I may only import two leopard trophies in one calendar year. I understand that I may only import two African elephant trophies in one calendar year. In addition, I understand that raw ivory, once imported into the United States, cannot be re-exported.

Applicant's signature: [redacted] Date: FEB 13 2018

Be aware that there may be additio[redacted]tting or approval requirements by your local or state governments, as well as required by other Federal agencies or foreign government to conduct your propose activity. While the Service will attempt to assist where possible, it is your responsibility to obtain such approval.

8. All international shipment(s) must be through a designated port. A list of designated ports (where an inspector is posted) is available from http://www.fws.gov/le/designated-ports.html. If you wish to use a port not listed, please contact the Office of Law Enforcement for a Designated Port Exemption Permit (form 3-200-2).

9. Name and address where you wish the permit to be mailed, **if** different from page 1 (All permits will be mailed via the U.S. Postal Service, unless you identify an alternative means below):

Louis[redacted] Wickas, [redacted] Gallipolis, Ohio [redacted]

10. If you wish the permit to be delivered by means other than USPS regular mail, provide an air bill, pre-paid envelope, or billing information. If you do not have a pre-paid envelope or air bill and wish to pay for a courier service with your credit card, please check the box below. Please DO NOT include credit card number or other information; you will be contacted for this information.

☐ If a permit is issued, please send it via a courier service to the address on page 1 or question 9. I understand that you will contact me for my credit card information once the application has been processed.

11. Who should we contact if we have questions about the application? (Include name, phone number, and email):

Louis[redacted] Wickas, [redacted] Gallipolis, Ohio [redacted]

12. **Disqualification Factor**. A conviction, or entry of a plea of guilty or nolo contendere, for a felony violation of the Lacey Act, the Migratory Bird Treaty Act, or the Bald and Golden Eagle Protection Act disqualifies any such person from receiving or exercising the privileges of a permit, unless such disqualification has been expressly waived by the Service Director in response to a written petition. (50 CFR 13.21(c)) Have you or any of the owners of the business, if applying as a business, been convicted, or entered a plea of guilty or nolo contendere, forfeited collateral, or are currently under charges for any violations of the laws mentioned above?

☐ Yes ☑ No If you answered "Yes" provide: a) the individual's name, b) date of charge, c) charge(s), d) location of incident, e) court, and f) action taken for each violation.

SENTINEL LIMPOPO
S A F A R I S
P.O. BOX 45, BEIT BRIDGE, ZIMBABWE CELL: +27 83 254 0775 / +27 83 285 0064 EMAIL: HOP 0101

Mr Lou Wickas
(b) (6)
Gallipolis, OHIO, (b) (6) **USA**

Date: 20 January 2018

Dear Lou

RE: INVITATION TO HUNT

This letter serves to confirm that you have booked to stay with Sentinel Limpopo Safaris on Wape Ranch, Mwenezi, in September 2018 to hunt Elephant (M), Leopard (M), and Buffalo (M) and other Plainsgame species.

We confirm your itinerary as follows:

- You will be met in Bulawayo (BUQ) on 13 September 2018 and travel by road to Wape Ranch, Mwenezi.
- Your hunt (14 days) will take place from 14-27 September 2018.
- We will return you to Bulawayo on 28 September 2018 from where you will start your return journey to the United States.

With reference to the CITES listed species you will be hunting (Elephant and Leopard) please rest assured that

a) A quota for each of these species has been applied for and approved by the Zimbabwe National Parks and Wildlife Management Authority, specific to Wape Ranch, and that your hunt is within the confines of said quota, and
b) Your daily rate and trophy fees for your hunt go directly towards the maintenance and conservation of the animals and the natural habitat of the 6,000Ha property on which you will be hunting. These funds are used to maintain electric fences (designed to meet Veterinary-specifications to contain FMD Buffalo), to maintain and operate a number of waterpoints and to equip and provide for a 5-man anti-poaching team year round. Elephants numbers in particular must be controlled/ reduced, as at present numbers, they exceed the carrying capacity of the ranch, and do a great deal of damage to infrastructure (waterpoints, pumps and external fences) and have a visible negative impact on large indigenous tree species (Albizia breviflora, Acacia senegal, Commiphora merkeri, Combretum imberbe, Commiphora tenuipetiolata, Acacia xanthophloea, Hyphaene petersiana, Sclerocarya

birrea, Kirkia acuminata, Ficus sycamorous and Colophospermum mopane, to name a few). Without creating a value through hunting, these animals would more than likely have to be culled.

We thank you for booking your hunt with Sentinel Limpopo Safaris, and look forward to sharing the campfire with you once again.

Kind regards

VANESSA B BRISTOW
DIRECTOR - SENTINEL LIMPOPO SAFARIS (Reg. No. HOP0101)

FORM 3-201A (1/97)

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

IMPORT PERMIT

Page 1 of 1

1. Original Permit/Certificate No.
17US55820C/9

2. Valid
09/27/2018

3. Permittee (name and address, country)
LOUIS (b) WICKAS (b)
(b) (6)
GALLIPOLIS, OH (b) (6)
U.S.A.

4. Consignor (name and address, country)
COLLETT'S WILDLIFE ARTISTRY
15 JOSIAH CHINAMANO ROAD
BELMONT
BULAWAYO
ZIMBABWE

5. Special Conditions

ALL APPLICABLE FOREIGN, LOCAL, STATE, OR OTHER FEDERAL LAWS, INCLUDING THOSE REQUIRING PERMITS, MUST BE OBSERVED.

SPECIMEN MAY NOT BE SOLD OR TRANSFERRED FOR ANY FINANCIAL REMUNERATION.

U.S. THREATENED SPECIES [50 CFR 17.40(f)].

MUST IMPORT THROUGH A DESIGNATED PORT LISTED IN CONDITION 10. PERMITTEE MAY ONLY IMPORT TWO LEOPARD TROPHIES PER CALENDAR YEAR.

EACH LEOPARD SKIN MUST HAVE SELF-LOCKING TAG ATTACHED TO IT WHICH INDICATES THE STATE OF EXPORT, THE NUMBER OF THE SPECIMEN IN RELATION TO THE ANNUAL QUOTA, AND THE CALENDAR YEAR TO WHICH THE QUOTA APPLIES. THE EXPORT PERMIT (OR RE-EXPORT CERTIFICATE) MUST CONTAIN THE TAGGING INFORMATION AS OUTLINED ABOVE.

TROPHY MUST HAVE BEEN TAKEN DURING 2017 HUNTING SEASON.

May not be used for commercial purposes. For live animals, only valid if the transport conditions comply with the CITES Guidelines for Transport of Live Animals or, in the case of air transport, with IATA Live Animals Regulations.

5a. Purpose of Transaction
H

6. U.S. Management Authority
Department of the Interior
U.S. FISH AND WILDLIFE SERVICE
DIVISION OF MANAGEMENT AUTHORITY
BRANCH OF PERMITS, MS: IA
5275 LEESBURG PIKE
FALLS CHURCH VA 22041-3803

U.S. CITES Management Authority

09/28/2017
Issuing Date

United States Management Authority

AUTHORITY: Endangered Species Act of 1973 (16 USC 1531 et. seq.)

7/8. Common Name and Scientific name (genus and species) of Animal or Plant	9. Description of Part or Derivative, including identifying marks or numbers (age/sex if live)	10. Appendix No. and Source
A. Common Name LEOPARD Scientific Name PANTHERA PARDUS	9. IMPORT PERSONAL SPORT HUNTED TROPHY (shipment may contain bones, claws, hide, skull, teeth, or any taxidermied part, as well as worked, manufactured, or handicraft items such as curios or jewelry, that must accompany raw or tanned parts.)	10. 1 W 11. Quantity (including units) 1 NO 12. Country of Origin ZIMBABWE
B. Common Name Scientific Name	9.	10. 11. Quantity (including units) 12. Country of Origin
C. Common Name Scientific Name	9.	10. 11. Quantity (including units) 12. Country of Origin
D. Common Name Scientific Name	9.	10. 11. Quantity (including units) 12. Country of Origin
E. Common Name Scientific Name	9.	10. 11. Quantity (including units) 12. Country of Origin

726257

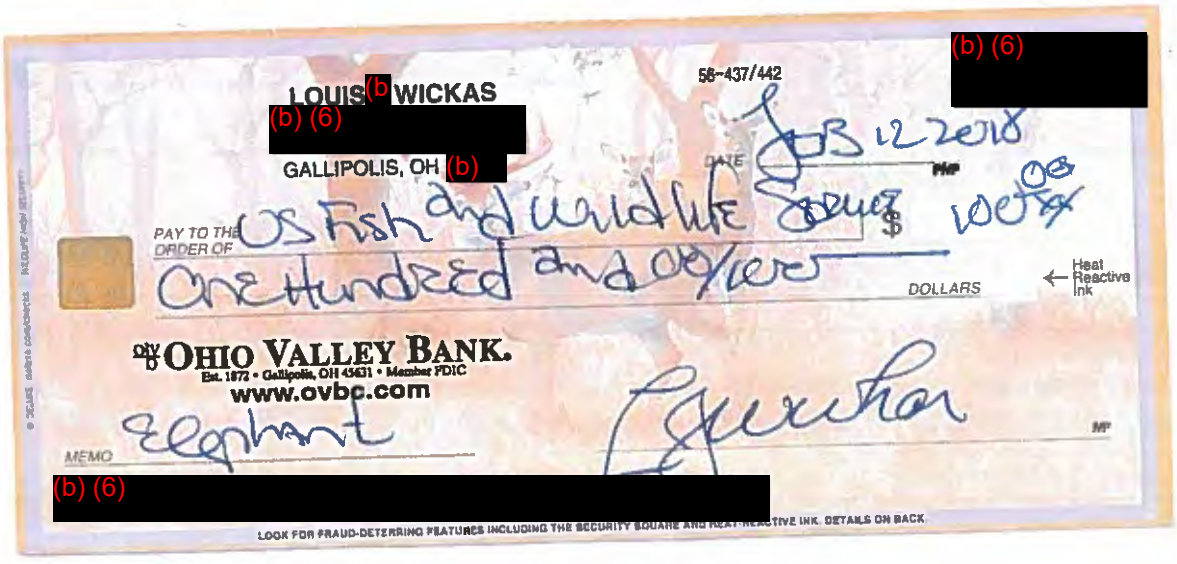
February 12, 2018

U.S Fish and Wildlife Service
Division of Management Authority (DMA)
Branch of permits, MS:IA
5275 Leesburg Pike
Falls Church, VA 22041-3803

RE: Louis (b) Wickas
Form 3-200-19

Clarification of Answer, Section E, Note 1

A copy of a valid but previously unused permit is being submitted, **instead of the original** because the original was submitted with another application being submitted this year.


LOUIS (b
(b) (6)
GALLIPOLIS, OH (b)
58-437/442
(b) (6)
DATE
PAY TO THE ORDER OF
US Fish and Wildlife Service
$ 100.00
One Hundred and 00/100
DOLLARS
Heat Reactive Ink
OHIO VALLEY BANK.
Est. 1872 • Gallipolis, OH 45631 • Member FDIC
www.ovbc.com
MEMO
Elephant
(b) (6)
LOOK FOR FRAUD-DETERRING FEATURES INCLUDING THE SECURITY SQUARE AND HEAT-REACTIVE INK. DETAILS ON BACK.

Department of the Interior
U.S. Fish and Wildlife Service

OMB No. 1018-0093
Expires 05/31/2017

Federal Fish and Wildlife Permit Application Form

RCVD MAR 22 2018

LB

Return to: U.S. Fish and Wildlife Service
Division of Management Authority (DMA)
Branch of Permits, MS: IA
5275 Leesburg Pike
Falls Church, VA 22041-3803
1-800-358-2104 or 703-358-2104

Type of Activity:
Import of Sport-hunted Trophies of Southern African Leopard, African Elephant, and Namibian Southern White Rhinoceros

Complete Sections A or B, and C, D, and E of this application. U.S. address may be required in Section C, see instructions for details.
See attached instruction pages for information on how to make your application complete and help avoid unnecessary delays.

A. Complete if applying as an individual

1.a. Last name	1.b. First name	1.c. Middle name or initial	1.d Suffix
Benben	Michael	(b) (6)	

2. Date of birth (mm/dd/yyyy)	3. Social Security No.	4. Occupation	5. Affiliation/ Doing business as (see instructions)
(b) (6)			N/A

6.a. Telephone number	6.b. Alternate telephone number	6.c. Fax number	6.d. E-mail address
(b) (6)		(b) (6)	

B. Complete if applying on behalf of a business, corporation, public agency, Tribe, or institution

1.a. Name of business, agency, Tribe, or institution	1.b. Doing business as (dba)
N/A	N/A

2. Tax identification no.	3. Description of business, agency, Tribe, or institution
N/A	N/A

4.a. Principal officer Last name	4.b. Principal officer First name	4.c. Principal officer Middle name/ initial	4.d. Suffix
N/A	N/A	N/A	

5. Principal officer title	6. Primary contact name
N/A	N/A

7.a. Business telephone number	7.b. Alternate telephone number	7.c. Business fax number	7.d. Business e-mail address
N/A	N/A	N/A	N/A

C. All applicants complete address information

1.a. Physical address (Street address; Apartment #, Suite #, or Room #; no P.O. Boxes)
(b) (6)

1.b. City	1.c. State	1.d. Zip code/Postal code	1.e. County/Province	1.f. Country
Racine	WI	(b) (6)		USA

2.a. Mailing Address (include if different than physical address, include name of contact person if applicable)
Same - contact (b) (6)

2.b. City	2.c. State	2.d. Zip code/Postal code	2.e. County/Province	2.f. Country

D. All applicants MUST complete

1. Attach check or money order payable to the U.S. FISH AND WILDLIFE SERVICE **in the amount of $100, nonrefundable processing fee.** Federal, Tribal, State, and local government agencies, and those acting on behalf of such agencies, are exempt from the processing fee – ***attach documentation of fee exempt status as outlined in instructions.*** (50 CFR 13.11(d))

2. Do you currently have or have you ever had any Federal Fish and Wildlife permits?
Yes ☒ If yes, list the number of the most current permit you have held or that you are applying to renew/re-issue: from 1989- don't know number No ☐

3. Certification I hereby certify that I have read and am familiar with the regulations contained in ***Title 50, Part 13 of the Code of Federal Regulations*** and the other ***applicable parts in subchapters B of Chapter I of Title 50***, and I certify that the information submitted in this application for a permit is complete and accurate to the best of my knowledge and belief. I understand that any false statement herein may subject me to the criminal penalties of 18 U.S.C. 1001.

Signature (in blue ink) of applicant/person responsible for permit (No photocopied or stamped signatures) — Date of signature (mm/dd/yyyy): 3/14/2018

Please continue to next page

E. IMPORT OF SPORT-HUNTED TROPHIES OF SOUTHERN AFRICAN LEOPARD, AFRICAN ELEPHANT, AND NAMIBIAN SOUTHERN WHITE RHINOCEROS

Note 1: If you hold an import permit for trophy/trophies that you did not use, please **return the unused original permit.** If you are requesting reissuance of a permit because you have taken a trophy, but were unable to import it prior to the expiration of the permit, please use the renewal form (3-200-52; http://www.fws.gov/international/permits/by-form-number/index.html) and return your original permit with that form.

Note 2: The U.S. FWS has determined that a trophy consists of raw or tanned parts of a specimen taken by a hunter during a sport hunt for personal use. It may include the bones, claws, hair, head, hide, hooves, horns, meat, skull, teeth, tusks, or any taxidermied part, including, but not limited to, a rug or taxidermied head, shoulder, or full mount. It does not include articles made from a trophy, such as worked, manufactured, or handicraft items for use as clothing, curios, ornamentation, jewelry, or other utilitarian items. If you wish to import such products, please contact the Division of Management Authority for the proper application form.

Note 3: Certain hunting trophies, including leopard, elephant, and rhinoceros hunting trophies, are subject to restrictions on their use after import into the United States. Please see 50 CFR 23.55 for more information or contact the Division of Management Authority.

Please provide the following information. Complete all questions on the application. Mark questions that are not applicable with "N/A". If applying for more than one trophy, be sure to answer questions 2 and 3 for each trophy. If importing trophies from more than one country, you must submit a separate application for each shipment in order to obtain separate import permits.

1: ENTER the quantity next to the name of the species you are applying to import (you may apply to import specimens of more than one species provided they have been/are being hunted in the same country):

Leopard (*Panthera pardus*) Quantity: _____ (Limited to the import of two per calendar year)

African elephant (*Loxodonta africana*) Quantity: 1 (Import permit is not required for trophies harvested in Botswana, Namibia, South Africa, or Zimbabwe). **Note: once imported, ivory cannot be re-exported.**

Southern white rhinoceros (*Ceratotherium simum simum*) from Namibia Quantity: _____ (An import permit is not required for trophies harvested in South Africa or Swaziland. If you are looking to import from a different country, please use form 3-200-37).

2. **IF ANIMAL IS CURRENTLY LIVING IN THE WILD,** please enter the following:
   a. Country and place (area, region, GIS coordinates, ranch AND nearest city) where wildlife is to be taken from the wild: Zimbabwe, Matabeleland South, Bubye Valley Conservancy, Beit Bridge(nearest town)

   b. Date wildlife is to be hunted:
   May 20, 2018 thru June 4, 2018

   c. Description of the trophy and parts you intend to import (e.g., skin, skull, shoulder mount, life size mount, claws, horns, tusks).
   skull, Tusks and skin

3. **IF THE ANIMAL IS DEAD,** please enter the following:
   a. Country and place (area, region, GIS coordinates, ranch, and/or AND nearest city) where trophy was removed from the wild: N/A

   b. Date wildlife was hunted:

c. Description of the trophy and parts you intend to import (e.g., skin, skull, shoulder mount, life size mount, claws, horn, tusks):

N/A

d. The current location of the trophy (address and country) [the U.S. import permit will identify this country as the country of export/re-export and must match with the export/re-export document]:

N/A

4. Complete name and address of overseas person or business shipping the trophy to you. If you are applying to import a trophy directly from Namibia, you **must** provide the name and address of the professional hunter listed on your Namibian hunting permit [this name will appear on the face of the export permit].

Name: Mazunga Safaris
Business Name:
Address: 8 Norfolk Road Hillside
Address:
City: Bulawayo
State/Province: Zimbabwe
Country, Postal Code: Africa

5. Please be aware that the U.S. Fish and Wildlife Service may need to make a finding that your activities will enhance or benefit wild populations of the species involved. If you have any information that could support this finding (e.g., how the funds from license/trophy fees will be spent, what portion of the hunting fee will support conservation), please submit such information on a separate page with your application.

CERTIFICATION STATEMENT (original signature must be provided for either 6 or 7 below)

6. **If you are a broker or taxidermist applying on behalf of a foreign national,** provide documentation to show you have a **Power of Attorney** to act on your client's behalf and sign the following statement.

I acknowledge that the sport-hunted trophy/trophies to be imported has been/will be personally hunted by my client and is being imported only for my client's personal use (i.e., **not for sale, transfer, donation, or exchange that is reasonably likely to result in economic use, gain, or benefit**). I understand that my client may only import two leopard trophies in one calendar year (if applicable). In addition, I have advised my client that raw ivory, once imported into the United States, cannot be re-exported.

Taxidermist/Broker's signature: N/A Date: _____

7. **If you are the hunter applying to import your own trophy,** please read and sign the following statement.

I acknowledge that the sport-hunted trophy/trophies to be imported has been/will be personally hunted by me and is being imported only for my personal use (i.e., **not for sale, transfer, donation, or exchange that is reasonably likely to result in economic use, gain, or benefit**). I understand that I may only import two leopard trophies in one calendar year (if applicable). In addition, I understand that raw ivory, once imported into the United States, cannot be re-exported.

Applicant's signature: _____ Date: 3/14/2018

Be aware that there may be additional permitting or approval requirements by your local or state governments, as well as required by other Federal agencies or foreign government to conduct your propose activity. While the Service will attempt to assist where possible, it is your responsibility to obtain such approval.

8. All international shipment(s) must be through a designated port. A list of designated ports (where an inspector is posted) is available from http://www.fws.gov/le/designated-ports.html. If you wish to use a port not listed, please contact the Office of Law Enforcement for a Designated Port Exemption Permit (form 3-200-2).
Port - Chicago, IL USA
Contact Mike Lewis @ Coppersmith Inc. 760 Bonnie Lane
Elk Grove Village, IL 60007 Phone: 847-437-1500 Ext 220

9. Name and address where you wish the permit to be mailed, if different from page 1 (All permits will be mailed via the U.S. Postal Service, unless you identify an alternative means below):

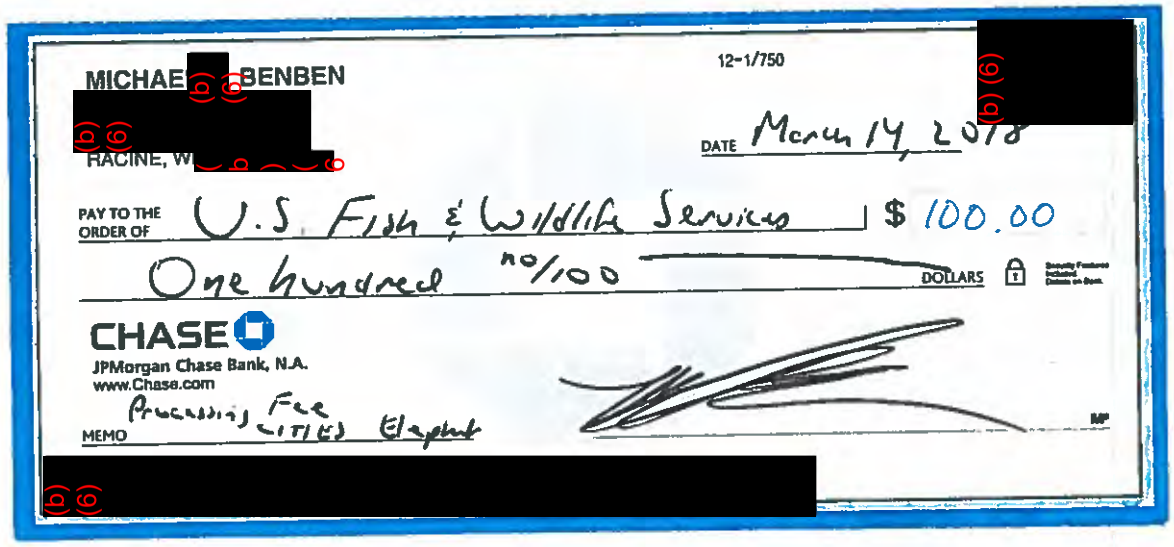
10. If you wish the permit to be delivered by means other than USPS regular mail, provide an air bill, pre-paid envelope, or billing information. If you do not have a pre-paid envelope or air bill and wish to pay for a courier service with your credit card, please check the box below. Please DO NOT include credit card number or other information; you will be contacted for this information.

☐ If a permit is issued, please send it via a courier service to the address on page 1 or question 9. I understand that you will contact me for my credit card information once the application has been processed.

11. Who should we contact if we have questions about the application? (Include name, phone number, and email):
Michael (b)(6) Benben cell: (b)(6)
email: [redacted]

12. **Disqualification Factor.** A conviction, or entry of a plea of guilty or nolo contendere, for a felony violation of the Lacey Act, the Migratory Bird Treaty Act, or the Bald and Golden Eagle Protection Act disqualifies any such person from receiving or exercising the privileges of a permit, unless such disqualification has been expressly waived by the Service Director in response to a written petition. (50 CFR 13.21(c)) Have you or any of the owners of the business, if applying as a business, been convicted, or entered a plea of guilty or nolo contendere, forfeited collateral, or are currently under charges for any violations of the laws mentioned above?

☐ Yes ☒ No If you answered "Yes" provide: a) the individual's name, b) date of charge, c) charge(s), d) location of incident, e) court, and f) action taken for each violation.


MICHAE (b)(6) BENBEN
(b)(6)
RACINE, W
12-1/750
(b)(6)
DATE March 14, 2018
PAY TO THE ORDER OF U.S. Fish & Wildlife Services
$ 100.00
One hundred no/100
DOLLARS
CHASE
JPMorgan Chase Bank, N.A.
www.Chase.com
MEMO Processing Fee CITIES Elephant
(b)(6)

Department of the Interior
U.S. Fish and Wildlife Service

OMB No. 1018-0164
Expires 11/30/2016

Federal Fish and Wildlife Permit Application Form

RCVD MAR 26 2018

LB

Return to: U.S. Fish and Wildlife Service
Division of Management Authority (DMA)
Branch of Permits, MS: IA
5275 Leesburg Pike
Falls Church, VA 22041-3803
1-800-358-2104 or 703-358-2104

Type of Activity:
Import of Sport-hunted Trophies of Southern African Leopard, African Elephant, and Namibian Southern White Rhinoceros

Complete Sections A or B, and C, D, and E of this application. U.S. address may be required in Section C, see instructions for details.
See attached instruction pages for information on how to make your application complete and help avoid unnecessary delays.

A. Complete if applying as an individual

1.a. Last name	1.b. First name	1.c. Middle name or initial	1.d. Suffix
Hardman	Paul	(b) (6)	—

2. Date of birth (mm/dd/yyyy)	3. Occupation	4. Affiliation/ Doing business as (see instructions)	
(b) (6)			

5.a. Telephone number	5.b. Alternate telephone number	5.c. Fax number	5.d. E-mail address
(b) (6)			(b) (6)

B. Complete if applying on behalf of a business, corporation, public agency, Tribe, or institution

1.a. Name of business, agency, Tribe, or institution	1.b. Doing business as (dba)		

2. Tax identification no	3. Description of business, agency, Tribe, or institution		

4.a. Principal officer Last name	4.b. Principal officer First name	4.c. Principal officer Middle name/ initial	4.d. Suffix

5. Principal officer title	6. Primary contact name

7.a. Business telephone number	7.b. Alternate telephone number	7.c. Business fax number	7.d. Business e-mail address

C. All applicants complete address information

1.a. Physical address (Street address, Apartment #, Suite #, or Room #, no P.O. Boxes)
(b) (6)

1.b. City	1.c. State	1.d. Zip code/Postal code	1.e. County/Province	1.f. Country
Lehi	Utah	(b) (6)		USA

2.a. Mailing Address (include if different than physical address, include name of contact person if applicable)

2.b. City	2.c. State	2.d. Zip code/Postal code	2.e. County/Province	2.f. Country

D. All applicants MUST complete

1. Attach check or money order payable to the U.S. FISH AND WILDLIFE SERVICE **in the amount of $100, nonrefundable processing fee**. Federal, Tribal, State, and local government agencies, and those acting on behalf of such agencies, are exempt from the processing fee – ***attach documentation of fee exempt status as outlined in instructions.*** (50 CFR 13.11(d))

2. Do you currently have or have you ever had any Federal Fish and Wildlife permits?
Yes ☐ If yes, list the number of the most current permit you have held or that you are applying to renew/re-issue: _____ No ☒

3. Certification. I hereby certify that I have read and am familiar with the regulations contained in ***Title 50, Part 13 of the Code of Federal Regulations*** and the other ***applicable parts in subchapter B of Chapter I of Title 50***, and I certify that the information submitted in this application for a permit is complete and accurate to the best of my knowledge. (b) (6) I understand that any false statement herein may subject me to the criminal penalties of 18 U.S.C. 1001.

Paul Hardman — 02-10-2018

Signature of applicant responsible for permit (No photocopied or stamped signatures) — Date of signature (mm/dd/yyyy)

Please continue to next page

E. IMPORT OF SPORT-HUNTED TROPHIES OF SOUTHERN AFRICAN LEOPARD, AFRICAN ELEPHANT, AND NAMIBIAN SOUTHERN WHITE RHINOCEROS

Note 1: If you hold an import permit for a trophy/trophies that you did not use, please **return the unused original permit.** If you are requesting reissuance of a permit because you have taken a trophy, but were unable to import it prior to the expiration of the permit, please use the renewal form (3-200-52; http://www.fws.gov/international/permits/by-form-number/index.html) and return your original permit with that form.

Note 2: *Sport-hunted trophy* is defined at 50 CFR 23.74 as follows: *Sport-hunted trophy* means a whole dead animal or a readily recognizable part or derivative of an animal specifically identified on the accompanying CITES document that meets the following criteria:

(1) Is raw, processed, or manufactured;
(2) Was legally obtained by the hunter through hunting for his or her personal use;
(3) Is being imported, exported, or re-exported by or on behalf of the hunter as part of the transfer from its country of origin ultimately to the hunter's country of usual residence; and
(4) Includes worked, manufactured, or handicraft items made from the sport-hunted animal only when:
  (i) Such items are contained in the same shipment as raw or tanned parts of the sport-hunted animal and are for the personal use of the hunter;
  (ii) The quantity of such items is no more than could reasonably be expected given the number of animals taken by the hunter as shown on the license or other documentation of the authorized hunt accompanying the shipment; and
  (iii) The accompanying CITES documents (export document and, if appropriate, import permit) contain a complete itemization and description of all items included in the shipment.

Note 3: Certain hunting trophies, including leopard, elephant, and rhinoceros hunting trophies, are subject to restrictions on their use after import into the United States. Please see 50 CFR 23.55 for more information or contact the Division of Management Authority.

Please provide the following information. Complete all questions on the application. Mark questions that are not applicable with "N/A". If applying for more than one trophy, be sure to answer questions 2 and 3 for each trophy.

If importing trophies from more than one country, you must submit a separate application for each shipment in order to obtain separate import permits.

1. ENTER the quantity next to the name of the species you are applying to import (you may apply to import specimens of more than one species provided they have been/are being hunted in the same country):

Leopard (*Panthera pardus*) Quantity: 1 (Import is limited to two per hunter per calendar year)

African elephant (*Loxodonta africana*) Quantity: 1 (Import is limited to two per hunter per calendar year)
Note: once imported, ivory cannot be re-exported.

Southern white rhinoceros (*Ceratotherium simum simum*) from Namibia Quantity: na (An import permit is not required for trophies harvested in South Africa or Swaziland. If you wish to import from a different country, please use form 3-200-37).

2. **IF ANIMAL IS CURRENTLY LIVING IN THE WILD,** please enter the following:
   a. Country and place (area, region, GIS coordinates, ranch AND nearest city) where wildlife is to be taken from the wild:

   b. Date wildlife is to be hunted:

c. Description of the trophy and parts you intend to import (e.g., skin, skull, shoulder mount, life size mount, claws, horns, tusks).

3. **IF THE ANIMAL IS DEAD**, please enter the following:
   a. Country and place (area, region, GIS coordinates, ranch, and/or AND nearest city) where trophy was removed from the wild: Leopard - 3-3-17 — 3-18-17
   b. Date wildlife was hunted: ELEphant - 11-7-2016 — 11-21-2016 —
   Elephant - Mangetti Park - Windhoek Namibia
   Leopard — Okakango Ptn 4 #58 — Windhoek Namibia
   c. Description of the trophy and parts you intend to import (e.g., skin, skull, shoulder mount, life size mount, claws, horn, tusks):

      leopard-life size mount elephant-skin,skull,tusks,shoulder mount

   d. The current location of the trophy (address and country) [the U.S. import permit will identify this country as the country of export/re-export and must match with the export/re-export document]:
      The Yellow Shark Holdings (pty) ltd.
      POBox 81413
      Olympia, Windhook Republic of Namibia, Namibia

4. Complete name and address of overseas person or business shipping the trophy to you. If you are applying to import a trophy directly from Namibia, you **must** provide the name and address of the professional hunter listed on your Namibian hunting permit [this name will appear on the face of the export permit].

Name: Business	The Yellow Shark Holdings (pty) ltd
Name: Address:	po box 81413
Address:	
City:	Olympia-Windhook,
State/Province:	Republic of Namiba
Country, Postal Code:	Namibia

5. Please be aware that the U.S. Fish and Wildlife Service may need to make a finding that your activities will enhance or benefit wild populations of the species involved. If you have any information that could support this finding (e.g., how the funds from license/trophy fees will be spent, what portion of the hunting fee will support conservation), please submit such information on a separate page with your application.

CERTIFICATION STATEMENT (original signature must be provided for either 6 or 7 below)

6. **If you are a broker or taxidermist applying on behalf of a foreign national,** provide documentation to show you have a **Power of Attorney** to act on your client's behalf and sign the following statement.

   I acknowledge that the sport-hunted trophy/trophies to be imported has been/will be personally hunted by my client and is being imported only for my client's personal use (i.e., **not for sale, transfer, donation, or exchange that is reasonably likely to result in economic use, gain, or benefit**). I understand that my client may only import two leopard trophies in one calendar year. I understand that my client may only import two African elephant trophies in one calendar year. In addition, I have advised my client that raw ivory, once imported into the United States, cannot be re-exported.

   Taxidermist/Broker's signature:_____ Date: _____

7. **If you are the hunter applying to import your own trophy**, please read and sign the following statement.

I acknowledge that the sport-hunted trophy/trophies to be imported has been/will be personally hunted by me and is being imported only for my personal use (i.e., **not for sale, transfer, donation, or exchange that is reasonably likely to result in economic use, gain, or benefit**). I understand that I may only import two leopard trophies in one calendar year. I understand that I may only import two African elephant trophies in one calendar year. In addition, I understand that raw ivory, once imported into the United States, cannot be re-exported.

Applicant's signature: Paul (b) (6) Hardman Date: Feb. 18, 2018

Be aware that there may be additional permitting or approval requirements by your local or state governments, as well as required by other Federal agencies or foreign government to conduct your propose activity. While the Service will attempt to assist where possible, it is your responsibility to obtain such approval.

8. All international shipment(s) must be through a designated port. A list of designated ports (where an inspector is posted) is available from http://www.fws.gov/le/designated-ports.html. If you wish to use a port not listed, please contact the Office of Law Enforcement for a Designated Port Exemption Permit (form 3-200-2).

9. Name and address where you wish the permit to be mailed, **if** different from page 1 (All permits will be mailed via the U.S. Postal Service, unless you identify an alternative means below):

10. If you wish the permit to be delivered by means other than USPS regular mail, provide an air bill, pre-paid envelope, or billing information. If you do not have a pre-paid envelope or air bill and wish to pay for a courier service with your credit card, please check the box below. Please DO NOT include credit card number or other information; you will be contacted for this information.

☒ If a permit is issued, please send it via a courier service to the address on page 1 or question 9. I understand that you will contact me for my credit card information once the application has been processed.

11. Who should we contact if we have questions about the application? (Include name, phone number, and email):

Paul Hardman (b) (6)

12. **Disqualification Factor.** A conviction, or entry of a plea of guilty or nolo contendere, for a felony violation of the Lacey Act, the Migratory Bird Treaty Act, or the Bald and Golden Eagle Protection Act disqualifies any such person from receiving or exercising the privileges of a permit, unless such disqualification has been expressly waived by the Service Director in response to a written petition. (50 CFR 13.21(c)) Have you or any of the owners of the business, if applying as a business, been convicted, or entered a plea of guilty or nolo contendere, forfeited collateral, or are currently under charges for any violations of the laws mentioned above?

☐ Yes ☑ No If you answered "Yes" provide: a) the individual's name, b) date of charge, c) charge(s), d) location of incident, e) court, and f) action taken for each violation.

Paul (b) Hardman
(b) (6)(6)
(b) (6)

97-32/1243

No. (b) (6)

Date 3-15-18

Pay to the order of US Fish & Wildlife Service $ 100.00

One hundred and no/100 Dollars

Lehi Office
Central Bank
475 East Main Street 766-3886
Lehi, Utah 84043

Memo (b) (6)

Form 3-200-20

OMB Control No. 1018-0093
Expires 08/31/2020

RCVD MAR 27 2018

LB

Department of Interior
U.S. Fish and Wildlife Service
Federal Fish and Wildlife Permit Application Form

U.S. Fish and Wildlife Service
Division of Management Authority
Branch of Permits, MS: IA
5275 Leesburg Pike
Falls Church, VA 22041-3803
1-800-358-2104 or 703-358-2104

Type of Activity

IMPORT OF SPORT-HUNTED TROPHIES (Appendix I of CITES and/or ESA)

Complete Sections A or B, and C, D, and E of this application. U.S. address may be required in Section C, see instructions for details.
You may find instructions on how to make your application complete and help avoid unnecessary delays at the following link: .

Section A: Complete if applying as an individual

1.a. Last Name	1.b. First Name	1.c. Middle Name/Initial	1.d. Suffix
OLIVER	ROBERT	(b) (6) [redacted]	
2. Date of Birth (mm/dd/yyyy)	**3. Telephone Number**	**3.a. Alternate Telephone Number**	**4. E-mail address**
(b) (6) [redacted]			(b) (6) [redacted]

Section B: Complete if applying on behalf of a business, corporation, public agency, Tribe, or institution

1.a. Name of business, agency, Tribe, or institution		1.b. Doing business as (DBA)	
2. Tax identification no.		3. Description of business, agency, Tribe, or institution	
4.a. Principal officer Last name	4.b. Principal officer First Name	4.c. Principal officer Middle name/initial	4.d. Suffix
5. Principal officer title	6. Primary contact name		
7.a. Business telephone number	7.b. Alternate telephone number	7.c. Business fax number	7.d. Business e-mail address

Section C: All applicants complete address information

1.a. Physical address (Street address, Apartment #, Suite #, or Room #, no P.O. Boxes)				
(b) (6) [redacted]				
1.b. City	1.c. State	1.d. Zip code/Postal code	1.e. County/Province	1.f. Country
TERREBONNE	OR	(b) (6) [redacted]		USA
2.a. Mailing address (include if different than physical address, include name of co				
2.b. City	2.c. State	2.d. Zip code/Postal code	2.e. County/Province	2.f.Country

Section D: All applicants MUST complete

1. Attach check or money order payable to the U.S. FISH AND WILDLIFE SERVICE **in the amount identified on page 2, nonrefundable processing fee.** Federal, Tribal, State, and local government agencies, and those acting on behalf of such agencies, are exempt from the processing fee – *attach documentation of fee exempt status as outlined in instructions.* [50 CFR 13.11(d)]

2. Certification: I hereby certify that I have read and am familiar with the regulations contained in ***Title 50 Part 13 of the Code of Federal Regulations*** and the other ***applicable parts in subchapter B of Chapter I of Title 50***, and I certify that the information submitted in this application for a permit is complete and accurate to the best of my knowledge and belief. I understand that any false statement herein may subject me to the criminal penalties of 18 U.S.C. 1001.

Signature of applicant/Principal Officer for permit (No photocopied or stamped signatures) Date of signature (mm/dd/yyyy)

(b) (6) [redacted]

Please continue to next page

E. IMPORT OF SPORT-HUNTED TROPHIES *(Appendix I of CITES and/or ESA)*

Note 1: This form should be used to request authorization to import trophies of species listed on Appendix I of CITES and/or as threatened or endangered under the ESA (examples include elephants, lions, cheetahs, wood bison, and markhor).

PLEASE USE FORM 3-200-19 FOR SOUTHERN AFRICAN LEOPARD TROPHIES AND SOUTHERN WHITE RHINOCEROS TROPHIES TAKEN IN NAMIBIA.

Note 2: If you hold an import permit for trophy/trophies that you did not use, please **return the unused original permit.** If you are requesting reissuance of a permit because you have taken a trophy, but were unable to import it prior to the expiration of the permit, please use the renewal form (3-200-52) and return your original permit with that form.

Note 3: Applications for species listed as endangered under the U.S. Endangered Species Act are published in the Federal Register for a 30-day public comment period. Please allow at least **90 days** for the application to be processed.

Note 4: *Sport-hunted trophy* is defined at 50 CFR 23.74 as follows: *Sport-hunted trophy* means a whole dead animal or a readily recognizable part or derivative of an animal specifically identified on the accompanying CITES document that meets the following criteria:

- Is raw, processed, or manufactured;
- Was legally obtained by the hunter through hunting for his or her personal use;
- Is being imported, exported, or re-exported by or on behalf of the hunter as part of the transfer from its country of origin ultimately to the hunter's country of usual residence; and
- Includes worked, manufactured, or handicraft items made from the sport-hunted animal only when:
  - i. Such items are contained in the same shipment as raw or tanned parts of the sport-hunted animal and are for the personal use of the hunter;
  - ii. The quantity of such items is no more than could reasonably be expected given the number of animals taken by the hunter as shown on the license or other documentation of the authorized hunt accompanying the shipment; and
  - iii. The accompanying CITES documents (export document and, if appropriate, import permit) contain a complete itemization and description of all items included in the shipment.

Note 5: Certain hunting trophies, including elephants, are subject to restrictions on their use after import into the United States. Please see 50 CFR 23.55 for more information or contact the Division of Management Authority.

Please provide the following information. Complete all questions on the application. Mark questions that are not applicable with "N/A". If needed, use a separate sheet of paper. On all attachments or separate sheets you are submitting; please indicate the application question number you are addressing. If applying for more than one trophy, be sure to answer questions 1-6 for each trophy addressed in this application. If importing trophies from more than one country, you must submit a separate application for each shipment in order to obtain separate import permits.

1. Name and address where you wish the permit to be mailed, if different from page 1. If you would like expedited shipping, please enclose a self-addressed, pre-paid, computer-generated, courier service airway bill. If unspecified, all documents will be mailed via the U.S. Postal Service.

2. Who should we contact if we have questions about the application (name, phone number, and e-mail)?

3. Have you or your client (if a broker applying on behalf of your client), been assessed a civil penalty or convicted of any criminal provision of any statute or regulation relating to the activity for which the application is filed; been convicted, or entered a plea of guilty or nolo contendere, for a felony violation of the Lacey Act, the Migratory Bird Treaty Act, or the Bald and Golden Eagle Protection Act; forfeited collateral; OR are currently under charges for any violation of the laws mentioned above?

(No) Yes

If you answered "Yes" to Question 3, provide: a) the individual's name; b) date of charge; c) charge(s); d) location of incident; e) court, and f) action taken for each violation. Please be aware that a "Yes" response does not automatically disqualify you from getting a permit.

4. For each trophy to be imported, provide:

   a. Scientific name (genus, species, and, if applicable, subspecies) and common name.
   LOXODONTA AFRICANA

   b. Sex (if known).
   MALE

5. **IF ANIMAL IS CURRENTLY LIVING IN THE WILD**, please enter the following information:

   a. Country and place (area, region, GIS coordinates, ranch, conservancy, management area, or hunting block, AND nearest city) where wildlife is to be taken from the wild:
   ZIMBABWE, NGAMO/SIKUMI FOREST, VICTORIA FALLS

   b. Date wildlife is to be hunted:
   23 SEPTEMBER — 07 OCTOBER, 2018

   c. Name of hunting outfitter, safari company, or professional hunter you will be hunting with:
   MARTIN PIETERS SAFARIS

6. IF THE TROPHY HAS ALREADY BEEN TAKEN, please enter the following:

   a. Country and place (area, region, GIS coordinates, ranch, conservancy, management area, or hunting block, AND nearest city) where trophy was removed from the wild:

   b. Date wildlife was hunted:

c. Name of hunting outfitter, safari company, or professional hunter you hunted with:

d. The current location of the trophy (address and country) [the U.S. import permit will identify this country as the country of export/re-export and must match with the export/re-export document]:

7. Please provide a copy of any applicable foreign government permits or licenses that were required to remove this animal from the wild (if you have not hunted yet and do not currently hold any such permits or licenses, please indicate so). I DO NOT CURRENTLY HAVE PERMITS IN HAND. BEING APPLIED FOR BY MARTIN PIETERS SAFARIS
8. Complete name and address of overseas person or business shipping the trophy to you. If you are applying to import a trophy directly from Namibia, you must provide the name and address of the professional hunter listed on your Namibian hunting permit [this name will appear on the face of the export permit].

   Name:
   Business Name:
   Address:
   City:
   State/Province:
   Country, Postal Code:

9. For species listed under the Endangered Species Act, please be aware that the U.S. Fish and Wildlife Service must make a finding that your activities will enhance or benefit wild populations of the species involved. While we will communicate with the range country for the species you will hunt or hunted when making the required findings, if you have any information that could support this finding, it would be helpful to our review if you could provide it. Please submit such information on a separate page with your application.

   a. Do you have any information regarding the population status or trend data on the species hunted?
   REFER TO LETTER FROM HON. E.D. MNANGAGWA, PRES ZIMBABWE TO PRESIDENT TRUMP DATED 6 DECEMBER 2017

   b. In order to hunt, you likely paid for licenses or trophy fees. What were those fees and do you have any information on how those funds were used by either the landowner, community, or government?
   SEE ENCLOSED CONTRACT FOR PIETERS WITH THIS INFORMATION

   c. Do you have information on other funding activities that are being carried out, or were carried out, by the safari outfitter, professional hunter, concession holder, or land owner that provide a conservation benefit to the species being hunted/species hunted
   PART OF THE FEES PAID ARE USED:
   1. FOR FUNDING TO ASSIST ANIMAL CONSERVATION
   2. FOR ANTI POACHING EFFORTS
   3. COMMUNITY IMPROVEMENT
   4. MOST OF THE ANIMAL WILL BE DISTRIBUTED TO LOCAL FOLK FOR FOOD

CERTIFICATION STATEMENT (original signature must be provided for either 10 or 11 below)

10. If you are a broker or taxidermist applying on behalf of a U.S. hunter or foreign national, provide documentation to show you have a Power of Attorney to act on your client's behalf and sign the following statement.

    I acknowledge that the sport-hunted trophy/trophies to be imported has been/will be personally hunted by my client and is being imported only for my client's personal use (i.e., not for sale, transfer, donation, or exchange that is reasonably likely to result in economic use, gain, or benefit). If applying for the import of a leopard trophy, I understand that my client may only import two leopard trophies in one calendar year.

    Taxidermist/Broker's signature: _____ Date: _____

11. If you are the hunter applying to import your own trophy, please read and sign the following statement.

    I acknowledge that the sport-hunted trophy/trophies to be imported has been/will be personally hunted by me and is being imported only for my personal use (i.e., not for sale, transfer, donation, or exchange that is reasonably likely to result in economic use, gain, or benefit). If applying to import a leopard trophy, I understand that I may only import two leopard trophies in one calendar year.

    Applicant's signature: _____ Date: MARCH 22, 2018

    Be aware that there may be additional permitting or approval requirements by your local or state governments, as well as required by other Federal agencies or foreign government to conduct your propose activity. While the Service will attempt to assist where possible, it is your responsibility to obtain such approval.

12. All international shipment(s) must be through a designated port. A list of designated ports (where an inspector is posted) is available from **the list of designated ports**. If you wish to use a port not listed, please contact the Office of Law Enforcement for a Designated Port Exemption Permit (form 3-200-2).

President
State House
Harare
Zimbabwe

6 December 2017

His Excellency, Mr Donald Trump
President of the United States of America
1600 Pennsylvania Ave.
Washington, D.C. 20 006

RE: CONSERVATION OF ZIMBABWE'S ELEPHANT

On behalf of the people and Government of Zimbabwe, and indeed on my own behalf, I write to express profound appreciation for the US Fish and Wildlife Service determination that Zimbabwe's elephant conservation programme warrants the issuance of import permits in the United States of America after nearly three years. The conservation of elephant and other wildlife species in Zimbabwe is based on sustainable use and approach, much like the user-pay system in North America or the North American Model of Conservation. It is imperative that American safari hunters be permitted to bring their trophies home for the success of our conservation programme

Your Excellency, Zimbabwe has the second largest elephant population in Africa and the most up-to-date national elephant action plan which includes four regional plans. We need the participation of American hunters for revenues needed for management and to better control poaching. Importantly, our rural communities working with our Communal Areas Management Programme for Indigenous Resources (CAMPFIRE) programme need the support and incentives as well. Elephants will only survive in the long term if they are more valuable to people than their damage to alternative forms of land use, such as subsistence farming.

Furthermore, without a way of benefitting from the elephants, they are regarded as a liability and economic cost to poor rural communities, who suffer crop losses, other damages and loss of human life. Consequently, the

most effective strategy to prevent this displacement is to integrate elephants into rural economies as assets and to demonstrate that elephants contribute to the welfare and development of people. The involvement and empowerment of rural people in natural resources management, in combination with economic and financial incentives through sustainable use, capacity building and skills development, have been driving forces behind changes in attitudes towards wildlife on communally owned land in Zimbabwe.

Your Excellency, I wish to assure you that under my Presidency, the successful elephant programme will continue, including the implementation of the National Elephant Action Plan. Our country is politically stable, and we had a smooth transition from the previous administration, following my inauguration and swearing in as President and Commander-in-Chief of the Zimbabwe Defence Forces on 24 November 2017. All noble conservation initiatives being championed by Zimbabwe will not be reversed but enhanced. The Minister, Permanent Secretary and Director General are confirmed to remain in place.

Going forward, I do hope to improve communications and cooperation between your great country and Zimbabwe, in general, and particularly with the U.S. Fish and Wildlife Service, with the aim of strengthening our partnership in wildlife conservation, rural development and related spheres for an improved quality of life for our people.

Please accept, Your Excellency, the assurances of my highest consideration.

Hon. E.D. Mnangagwa
President of the Republic of Zimbabwe

cc e-mail to Secretary Ryan Zinke and Greg Sheehan - USFWS

MARTIN PIETERS SAFARIS

AGREEMENT

Agreement Between Martin Pieters Safaris and

Client Name: BOB OLIVER
Client Address: (b) (6) [redacted] Terrebonne, OR (b) (6) [redacted] USA
Location of Hunt: NGAMO/SIKUMI FOREST, ZIMBABWE
Date of Arrival: 22 EPTEMBER 2018 Travel Day to Camp
Date of Departure: 08 October 2018 Travel Day to Vic Falls
Location hunt starts: VICTORIA FALLS 23 September 2018
Location hunt ends: VICTORIA FALLS 07 October 2018
Number of hunting clients per Professional Hunter: 1
Number of non-hunting clients: N/A

Martin Pieters safaris will provide the following services & assumes responsibility for:

1. Suitable hunting concession.
2. All hunting camp accommodation, meals, soft drinks, bottled water & services of catering, laundry and camp staff for your use.
3. Provision of alcoholic beverages in moderation.
4. All hunting facilities and staff including a fully qualified PH. tracker(s) & skinner(s)
5. Fully equipped 4x4 hunting vehicle & driver.
6. Payment of conservation fees, concession fees ,all relevant hunting permits, firearm import permits on behalf of the client(s)
7. All field preparation of trophies, dip/ pack , Government trophy export, documentation and delivery of such to our local shipping agent.
8. A suitably knowledgeable person to facilitate customs procedures and firearm import on arrival & departure.
9. Booking of all charter flight services
10. Hotel reservations prior to & after hunt as required .
11. Arrangement of all airport/hotel and airstrip/camp transfers .

The Client takes full responsibility for:

1. International & domestic scheduled flight costs and reservations.
2. Hotel accommodation/transfer costs prior to & after hunt.
3. Payment of hunt cost–in full prior to departure.
4. Payment of air charter costs–in full prior to departure.
5. Payment of firearm import permit fees (if applicable)–in full prior to departure.

6. Payment of all trophy fees one very additional animal taken or wounded &lost, before departure from camp at conclusion of hunt, in US$ cash or pre arranged wire transfer.
7. Payment of all taxes for daily rates and trophy fees as per the Zimbabwe government stipulations.
8. Optional payment of staff & PH gratuities and any other personal expenses.
9. Payment for all trophy shipping & documentation from Zimbabwe and or taxidermy work, if applicable.
10. Visa fees & international airport departure fees
11. Ammunition tax imposed by Customs, as necessary

Hunt Costs:

15 DAYS @ $ 2500/ day Hunt begins 23 September through 07 October 2018

Extras

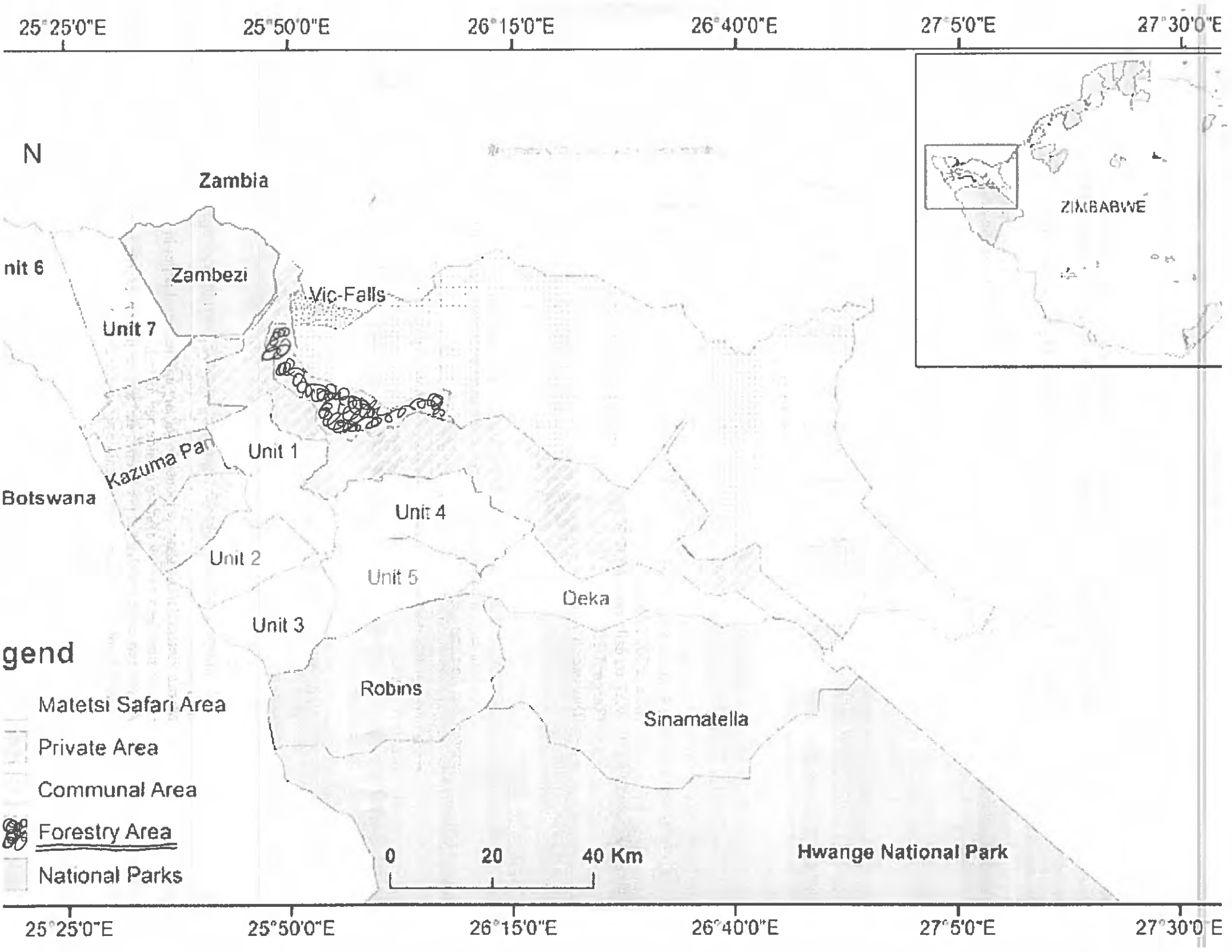
- Trophy fee elephant $ 22 500
- Plains game as per 2018 listed Ngamo rates.
- 4 % tax on trophy fees
- Cites $ 300 (elephant)
- VAT on daily rates $ 337.50
- Ranger $ 1170
- Dip/ pack $ 750

Cancellation Policy

In the event of the cancellation of the hunt by the Client, any deposit will not be refundable under any circumstances. However dates can be changed by mutual consent for the same year.
In the event of cancellation of the hunt by Martin Pieters Safaris, all efforts will be made to reschedule the hunt to the convenience of the client. Failing that, all monies will be refunded.

Please Note:

- Only mature males of the species listed above may be hunted.
- The client(s) takes full responsibility for all animals he shoots, whether killed or wounded & lost and thus is responsible for any penalty imposed by the Game Department should there be an infringement of the Game Laws, by accident or intent
- Any changes or alterations to this Agreement must be in writing and signed by both parties.
- Martin Pieters Safaris is not responsible for any unforeseen changes in Government fees/taxes, which are outside our control.
- Air charters costs are charged per aircraft and not per person. Martin Pieters Safaris is not responsible for any possible air charter delays.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Unit 4
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Matetsi Safari Area
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Communal Area
Forestry Area
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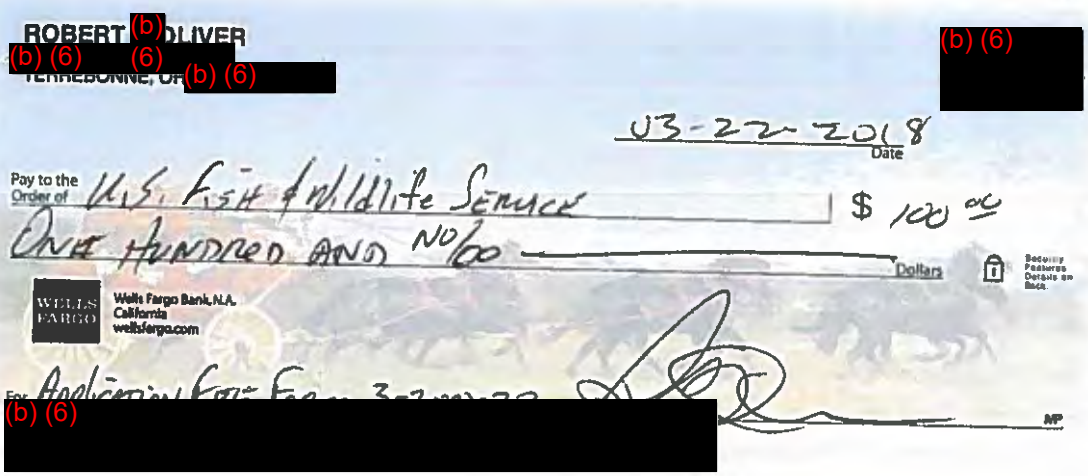
ROBERT (b) OLIVER
(b) (6) (6)
TERREBONNE, LA (b) (6)
(b) (6)
03-22-2018
Date
Pay to the Order of U.S. Fish & Wildlife Service
$ 100 00
ONE HUNDRED AND NO/00
Dollars
Security Features Details on Back.
WELLS FARGO
Wells Fargo Bank, N.A.
California
wellsfargo.com
For Application Fee
(b) (6)
MP

Department of the Interior
U.S. Fish and Wildlife Service

OMB No. 1018-0164
Expires 11/30/2016

Federal Fish and Wildlife Permit Application Form

Return to: U.S. Fish and Wildlife Service
Division of Management Authority (DMA)
Branch of Permits, MS: IA
5275 Leesburg Pike
Falls Church, VA 22041-3803
1-800-358-2104 or 703-358-2104

Type of Activity:
Import of Sport-hunted Trophies of Southern African Leopard, African Elephant, and Namibian Southern White Rhinoceros

RCVD FEB 28 2018

LB

Complete Sections A or B, and C, D, and E of this application. U.S. address may be required in Section C, see instructions for details.
See attached instruction pages for information on how to make your application complete and help avoid unnecessary delays.

A. Complete if applying as an individual

1.a. Last name	1.b. First name	1.c. Middle name or initial	1.d. Suffix
TATARCHUK	BRUCE	(b) (6)	

2. Date of birth (mm/dd/yyyy)	3. Occupation	4. Affiliation/ Doing business as (see instructions)
(b) (6)		

5.a. Telephone number	5.b. Alternate telephone number	5.c. Fax number	5.d. E-mail address
(b) (6)			

B. Complete if applying on behalf of a business, corporation, public agency, Tribe, or institution

1.a. Name of business, agency, Tribe, or institution	1.b. Doing business as (dba)

2. Tax identification no.	3. Description of business, agency, Tribe, or institution

4.a. Principal officer Last name	4.b. Principal officer First name	4.c. Principal officer Middle name/ initial	4.d. Suffix

5. Principal officer title	6. Primary contact name

7.a. Business telephone number	7.b. Alternate telephone number	7.c. Business fax number	7.d. Business e-mail address

C. All applicants complete address information

1.a. Physical address (Street address, Apartment #, Suite #, or Room #, no P.O. Boxes)
(b) (6)

1.b. City	1.c. State	1.d. Zip code/Postal code	1.e. County/Province	1.f. Country
AUBURN	AL	(b) (6)		USA

2.a. Mailing Address (include if different than physical address; include name of contact person if applicable)

2.b. City	2.c. State	2.d. Zip code/Postal code	2.e. County/Province	2.f. Country

D. All applicants MUST complete

1. ✓ Attach check or money order payable to the U.S. FISH AND WILDLIFE SERVICE **in the amount of $100, nonrefundable processing fee**. Federal, Tribal, State, and local government agencies, and those acting on behalf of such agencies, are exempt from the processing fee – ***attach documentation of fee exempt status as outlined in instructions.*** (50 CFR 13.11(d))

2. Do you currently have or have you ever had any Federal Fish and Wildlife permits?
Yes ☐ If yes, list the number of the most current permit you have held or that you are applying to renew/re-issue: _____ No ☒

3. Certification: I hereby certify that I have read and am familiar with the regulations contained in ***Title 50, Part 13 of the Code of Federal Regulations*** and the other ***applicable parts in subchapter B of Chapter I of Title 50***, and I certify that the information submitted in this application for a permit is complete and accurate to the best of my knowledge (b) (6) stand that any false statement herein may subject me to the criminal penalties of 18 U.S.C. 1001.

Signature of applicant/person responsible for permit (No photocopied or stamped signatures) — Date of signature (mm/dd/yyyy): 02/21/2018

Please continue to next page

E. IMPORT OF SPORT-HUNTED TROPHIES OF SOUTHERN AFRICAN LEOPARD, AFRICAN ELEPHANT, AND NAMIBIAN SOUTHERN WHITE RHINOCEROS

Note 1: If you hold an import permit for a trophy/trophies that you did not use, please **return the unused original permit**. If you are requesting reissuance of a permit because you have taken a trophy, but were unable to import it prior to the expiration of the permit, please use the renewal form (3-200-52; http://www.fws.gov/international/permits/by-form-number/index.html) and return your original permit with that form.

Note 2: *Sport-hunted trophy* is defined at 50 CFR 23.74 as follows: *Sport-hunted trophy* means a whole dead animal or a readily recognizable part or derivative of an animal specifically identified on the accompanying CITES document that meets the following criteria:

(1) Is raw, processed, or manufactured;
(2) Was legally obtained by the hunter through hunting for his or her personal use;
(3) Is being imported, exported, or re-exported by or on behalf of the hunter as part of the transfer from its country of origin ultimately to the hunter's country of usual residence; and
(4) Includes worked, manufactured, or handicraft items made from the sport-hunted animal only when:
  (i) Such items are contained in the same shipment as raw or tanned parts of the sport-hunted animal and are for the personal use of the hunter;
  (ii) The quantity of such items is no more than could reasonably be expected given the number of animals taken by the hunter as shown on the license or other documentation of the authorized hunt accompanying the shipment; and
  (iii) The accompanying CITES documents (export document and, if appropriate, import permit) contain a complete itemization and description of all items included in the shipment.

Note 3: Certain hunting trophies, including leopard, elephant, and rhinoceros hunting trophies, are subject to restrictions on their use after import into the United States. Please see 50 CFR 23.55 for more information or contact the Division of Management Authority.

Please provide the following information. Complete all questions on the application. Mark questions that are not applicable with "N/A". If applying for more than one trophy, be sure to answer questions 2 and 3 for each trophy.

If importing trophies from more than one country, you must submit a separate application for each shipment in order to obtain separate import permits.

1. ENTER the quantity next to the name of the species you are applying to import (you may apply to import specimens of more than one species provided they have been/are being hunted in the same country):

Leopard (*Panthera pardus*) Quantity: 0 (Import is limited to two per hunter per calendar year)

African elephant (*Loxodonta africana*) Quantity: 1 (Import is limited to two per hunter per calendar year)
Note: once imported, ivory cannot be re-exported.

Southern white rhinoceros (*Ceratotherium simum simum*) from Namibia Quantity: 0 (An import permit is not required for trophies harvested in South Africa or Swaziland. If you wish to import from a different country, please use form 3-200-37).

2. **IF ANIMAL IS CURRENTLY LIVING IN THE WILD**, please enter the following:
   a. Country and place (area, region, GIS coordinates, ranch AND nearest city) where wildlife is to be taken from the wild:

   b. Date wildlife is to be hunted:

c. Description of the trophy and parts you intend to import (e.g., skin, skull, shoulder mount, life size mount, claws, horns, tusks).

3. **IF THE ANIMAL IS DEAD**, please enter the following:
   a. Country and place (area, region, GIS coordinates, ranch, and/or AND nearest city) where trophy was removed from the wild: REPUBLIC OF SOUTH AFRICA, ALLDAYS, LIMPOPO PROVINCE GPS COORDINATES: S22 15.205; E029 06.509
   b. Date wildlife was hunted: Elephant was harvested on Sept. 11, 2017
   c. Description of the trophy and parts you intend to import (e.g., skin, skull, shoulder mount, life size mount, claws, horn, tusks): 2 elephant tusks from one elephant

   d. The current location of the trophy (address and country) [the U.S. import permit will identify this country as the country of export/re-export and must match with the export/re-export document]: Karoo Taxidermy 15 Van der Bijl Street, Graaff-Reinet, East Cape Province, Republic of South Africa, 6280

4. Complete name and address of overseas person or business shipping the trophy to you. If you are applying to import a trophy directly from Namibia, you **must** provide the name and address of the professional hunter listed on your Namibian hunting permit [this name will appear on the face of the export permit].

   Name: Business Karoo Taxidermy
   Name: Address: 15 Van der Bijl Street
   Address:
   City: Graaff-Reinet
   State/Province: Eastern Cape Province
   Country, Postal Code: Republic of South Africa 6280

5. Please be aware that the U.S. Fish and Wildlife Service may need to make a finding that your activities will enhance or benefit wild populations of the species involved. If you have any information that could support this finding (e.g., how the funds from license/trophy fees will be spent, what portion of the hunting fee will support conservation), please submit such information on a separate page with your application.

CERTIFICATION STATEMENT (original signature must be provided for either 6 or 7 below)

6. **If you are a broker or taxidermist applying on behalf of a foreign national,** provide documentation to show you have a **Power of Attorney** to act on your client's behalf and sign the following statement.

   I acknowledge that the sport-hunted trophy/trophies to be imported has been/will be personally hunted by my client and is being imported only for my client's personal use (i.e., **not for sale, transfer, donation, or exchange that is reasonably likely to result in economic use, gain, or benefit**). I understand that my client may only import two leopard trophies in one calendar year. I understand that my client may only import two African elephant trophies in one calendar year. In addition, I have advised my client that raw ivory, once imported into the United States, cannot be re-exported.

   Taxidermist/Broker's signature: N.A. Date: _____

7. **If you are the hunter applying to import your own trophy**, please read and sign the following statement.

I acknowledge that the sport-hunted trophy/trophies to be imported has been/will be personally hunted by me and is being imported only for my personal use (i.e., **not for sale, transfer, donation, or exchange that is reasonably likely to result in economic use, gain, or benefit**). I understand that I may only import two leopard trophies in one calendar year. I understand that I may only import two African elephant trophies in one calendar year. In addition, I understand that raw ivory, once imported into the United States, cannot be re-exported.

Applicant's signature: Bruce (b) (6) Tatarchuk Date: 02/21/2018

Be aware that there may be additional permitting or approval requirements by your local or state governments, as well as required by other Federal agencies or foreign government to conduct your propose activity. While the Service will attempt to assist where possible, it is your responsibility to obtain such approval.

8. All international shipment(s) must be through a designated port. A list of designated ports (where an inspector is posted) is available from http://www.fws.gov/le/designated-ports.html. If you wish to use a port not listed, please contact the Office of Law Enforcement for a Designated Port Exemption Permit (form 3-200-2).

9. Name and address where you wish the permit to be mailed, if different from page 1 (All permits will be mailed via the U.S. Postal Service, unless you identify an alternative means below):
mail to my home address

10. If you wish the permit to be delivered by means other than USPS regular mail, provide an air bill, pre-paid envelope, or billing information. If you do not have a pre-paid envelope or air bill and wish to pay for a courier service with your credit card, please check the box below. Please DO NOT include credit card number or other information; you will be contacted for this information.

☐ If a permit is issued, please send it via a courier service to the address on page 1 or question 9. I understand that you will contact me for my credit card information once the application has been processed.

11. Who should we contact if we have questions about the application? (Include name, phone number, and email):
Bruce Tatarchuk (b) (6) (home), (b) (6) (cell),
(b) (6)

12. **Disqualification Factor**. A conviction, or entry of a plea of guilty or nolo contendere, for a felony violation of the Lacey Act, the Migratory Bird Treaty Act, or the Bald and Golden Eagle Protection Act disqualifies any such person from receiving or exercising the privileges of a permit, unless such disqualification has been expressly waived by the Service Director in response to a written petition. (50 CFR 13.21(c)) Have you or any of the owners of the business, if applying as a business, been convicted, or entered a plea of guilty or nolo contendere, forfeited collateral, or are currently under charges for any violations of the laws mentioned above?

☐ Yes ☒ No If you answered "Yes" provide: a) the individual's name, b) date of charge, c) charge(s), d) location of incident, e) court, and f) action taken for each violation.

ORDINARY PERMIT

PERMIT NUMBER: O № 13818

(Issued in terms of the provisions of the National Environmental Management: Biodiversity Act 2004, Act 10 of 2004)

NAME	DEPT.
ADDRESS	Room Nunnia Erasmus Louis Trichardt
PROVINCE	Limpopo

DETAILS OF PERMIT HOLDER

NAME	BRUCE (b) (6)	ID NO.	
SURNAME	TATARCHUK	PASSPORT NO.	(b) (6)

	POSTAL ADDRESS	RESIDENTIAL ADDRESS
ADDRESS		(b) (6)
ADDRESS		AUBURN
ADDRESS		ALABAMA
TOWN		(b) (6)
POSTAL CODE		USA
PROVINCE		

PROPERTY WHERE RESTRICTED ACTIVITIES WILL BE CARRIED OUT

NAME AND SURNAME OF APPLICANT	MR. B.S. TATARCHUK
NAME AND SURNAME: RESPONSIBLE PERSON	MR. E. SMALL
NAME AND SURNAME OF AGENT	
PHYSICAL ADDRESS OF FACILITY	MAPUNGUBWE GAME RESERVE
PHYSICAL ADDRESS OF FACILITY	ALL DAYS
DISTRICT	VHEMBE
PROVINCE	LIMPOPO
REGISTERED NAME AND NUMBER (in the case of game farm)	MAPUNGUBWE GAME RESERVE

DETAILS OF SPECIES INVOLVED

SPECIES		SEX (if known)	QUANTITY	MARKING (if applicable)
COMMON NAME	SCIENTIFIC NAME			
ELEPHANT	LOXODONTA AFRICANA	MALE	001 (ONE)	

DETAILS OF RESTRICTED ACTIVITIES INVOLVED

TO HUNT ONE CITES MALE ELEPHANT ON THE PROPERTY MAPUNGUBWE GAME RESERVE – ALL DAYS – VHEMBE – LIMPOPO BY AN OVERSEAS CLIENT – MR. B.S. TATARCHUK FROM USA. –

NAME AND SURNAME OF PURCHASER/SELLER	
RESIDENTIAL ADDRESS OF PURCHASER/SELLER	

IN THE CASE OF INTERNATIONAL IMPORT/EXPORT:

NAME AND SURNAME OF CONSIGNEE/CONSIGNOR	
RESIDENTIAL ADDRESS OF CONSIGNEE/CONSIGNOR	

IN THE CASE OF A HUNT:

NAME AND SURNAME OF HUNTING CLIENT (if applicable)	MR. B.S. TATARCHUK
NAME AND SURNAME OF PROFESSIONAL HUNTER (if applicable)	MR. E. SMALL.
NAME AND SURNAME OF HUNTING OUTFITTER (if applicable)	MR. E. SMALL.
WEAPON AND METHOD OF HUNTING	RIFLE – HUNT ON FOOT.

IN THE CASE OF POSSESSION OF ELEPHANT IVORY OR RHINOCEROS HORN:

WEIGHT OF EACH PIECE APPLIED FOR	
LENGTH OF THE ELEPHANT IVORY	
BASE CIRCUMFERENCE OF ELEPHANT IVORY OR RHINOCEROS HORN	
REGISTRATION NUMBER	
MICROCHIP NUMBER	

PERMIT VALIDATION

PERIOD OF VALIDITY	FROM: 30/08/2017	TO:	30/09/2017
RECEIPT NUMBER	10015924 – AMOUNT = R5400-00 + 1000 LIONS		

SIGNATURE OF ISSUING OFFICER:	SIGNATURE OF PERMIT HOLDER: Bruce Tatarchuk
DATE STAMP: LOUIS TRICHARDT CENTRE 2017 -08- 30 P.O. BOX 3865 LOUIS TRICHARDT 0920	

HUNTING SPECIAL CONDITIONS

PERMIT NO: 13818

PERMIT HOLDER: Mr.B.J Tatarchuk

1. This permit does not absolve the holder thereof in obtaining any other permit, licence, certificate or document as may be required by any other relevant legislation from any province or country.
2. This permit must be signed by the permit holder and must be in his/her possession for the duration of the hunt.
3. This permit does not allow the hunting with a bow and arrow or any other prohibited method unless specified on the permit.
4. This permit does not authorise the hunting during the night, unless specified on the permit
5. This permit does not allow the hunting of listed species which is under the influence of a tranquilising, narcotic, immobilising or similar agent,
6. If a wounded animal crosses into a neighbouring country, province or property the Department as well as the country where the animal entered into must be notified within 24 hours
7. No driving of listed species for the purpose of hunting is authorised.
8. The Department reserves the right to nominate an official to be present during any or all hunts conducted in accordance with this permit.
9. The outcome of the hunt in the case of TOPS threatened species must be reported within two working days after the listed species was hunted, the hunt terminated or in the case where the hunt was not successful. This office reserves the right to inspect the hunting sight or any relevant product of such hunt.
10. In the case where trophies will not be exported from RSA the permit holder must immediately apply for a TOPS Possession Permit in the case of TOPS species
11. Elephant tusks must be marked by an Environmental officer
12. A TOPS Ordinary permit is required to convey any part of any TOPS specie hunted to any facility within the country, except a taxidermy
13. The Department may require scientific information or material from the animal hunted.
14. The non-compliance with the permit details as well as these special conditions will result in criminal charges and may influence the granting of similar permits to the permit holder.
15. Issued in terms of the Limpopo Environmental Management Act 2003, Act no. 7 of 2003.
16. An elephant/ crocodile may not be hunted next to the water's edge of an international border
17. In the case of dangerous game the minimum calibre requirement is a 375.
18. This permit does not absolve the applicant from conforming to the norms and standards for hunting
19. No put and take system of hunting is allowed.
20. No animal may be hunted in a controlled environment.
21. The use of dogs may only be used to flush birds or track wounded animals.
22. All clients must be accompanied by a Professional Hunter.

Permit Officer

30/08/2017

Date

WILDLIFE TRADE REGULATION
LOUIS TRICHARDT CENTRE
2017 -08- 30
P.O. BOX 3865 LOUIS TRICHARDT 0920
TEL (015) 516 0002
LIMPOPO PROVINCE

Permit Holder

06/09/2017

Date

Mapungubwe Game Reserve

P.O. Box 123
Alldays
0909
Republic of South Africa
Tel: 015 575 9939
Fax: 015 575 9940

Email: vhembe@lantic.net

Herewith permission is given to : Bruce(b) Tatarchuk

Passport Nr:(b) (6)

From:(b) (6) Auburn Alabama(b) (6) USA

to hunt on the following properties namely: Parma MS40 , Modena MS13, Sommerville MS9, Onrust MS80, Kruidfontein MR1, Vergenoegd MS7, Montrow MS6, Pont Drift MS12, Bultpan MS79, Princess Royal MS10, known as Mapungubwe Game Reserve.

The hunting will take place from 4 September 2017 till 16 September 2017

Exemption Permit Nr: ZA/LP/VLT/0149; Outfitter Permit Nr: ZA/LP/HO/1927; Professional Hunter Permit Nr: ZA/LP/HO/0754

Special Permit Nr:

Animals to be hunted:

SPECIE	*SEX*	*NUMBER*
Impala	Male	Five
Waterbuck	Male	Two
Blue wildebeest	Male/Female	Three
Warthog	Male/female	Three
Crocodile	Male/Female	One
Zebra	Male /Female	Three
Eland	Male	Four
Kudu	Male	Three
Klipspringer	Male	Two
Elephant	Male	One

28 August 2017

E. Small

SOUTH AFRICAN PROFESSIONAL HUNTING REGISTER AND TROPHY EXPORT APPLICATION

Duration of Hunt: Commenced 04 / 09 / 2017 Terminated 15 / 09 / 2017

A. LP № 66198

Tick appropriate Province block where hunt took place (separate sheet for each Province):

KwaZulu-Natal (KZN)	Free State (FS)	Gauteng (GP)	Limpopo Province (LP)	North West (NW)	Mpumalanga (MPA)	Western Cape (CNC)	Eastern Cape (EC)	Northern Cape (NC)

POST PERMIT TO (Mark correct block with X)

PROFESSIONAL HUNTER

Name
Business Address
ID No
PH Permit No
Date Signature

CLIENT

Name [redacted]
Permanent Postal Address [redacted]
Code [redacted] Country: U.S.A.
Passport No. [redacted]
Tel/Fax [redacted]
Date Signature

HUNTING OUTFITTER

Name
Business Address
Code
ID No
Tel No: Fax No:
HO Permit No
Date Signature

Farm Name Registration No	Magisterial District	Name & Residential Address of Land Owner	Hunting Permit Certificate/Licence No.	Date of Hunt From	Date of Hunt To	Species Killed or Wounded	Number Killed or Wounded	Sex F	Sex M	Part of Trophy to be Exported

Copies: Client Original
1st copy..... Forward to Nature Conservation authority where hunt took place
Hunting Outfitter 2nd copy..... Retain for a period of three years
Professional Hunter Last copy..... Remains in book

Address to which trophies are to be sent: As arranged with Taxidermy
Code 3630
Country: U.S.A Trophy Export Date (Estimate): 2017/10

Mapungubwe
Game Reserve

P.O. Box 123
Alldays
0909
Republic of South Africa
Tel: 015 575 9939
Fax: 015 575 9940

Email: vhembe@lantic.net

Herewith permission is given to : Bruc(b) (6) Tatarchuk

Passport Nr (b) (6)

From: (b) (6) Auburn Alabama (b) (6) USA

to hunt on the following properties namely: Parma MS40 , Modena MS13, Sommerville MS9, Onrust MS80, Kruidfontein MR1, Vergenoegd MS7, Montrow MS6, Pont Drift MS12, Bultpan MS79, Princess Royal MS10, known as Mapungubwe Game Reserve.

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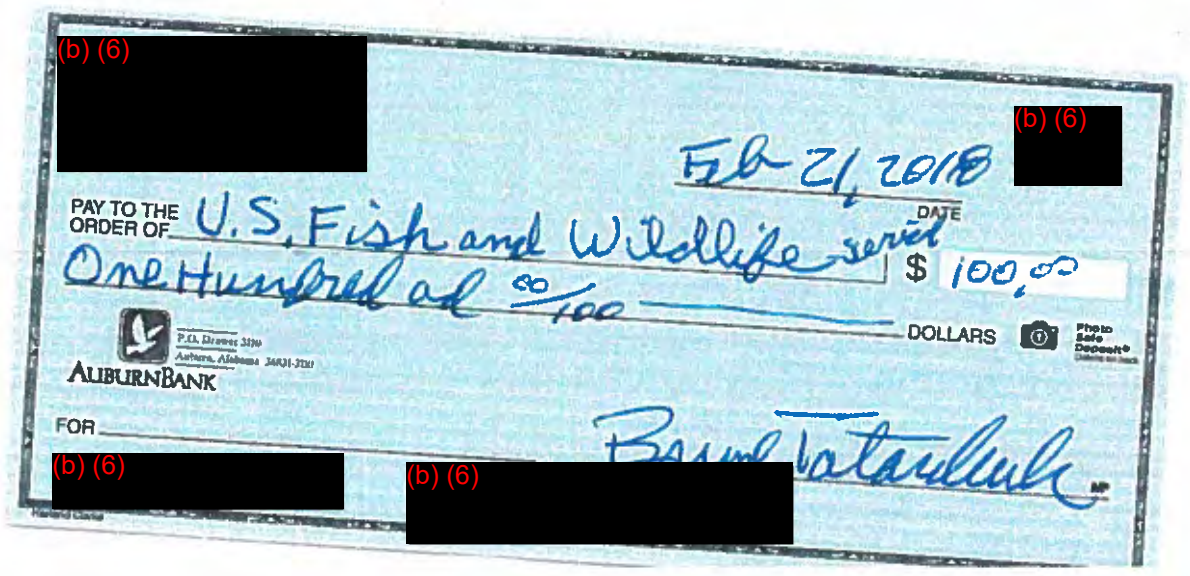
Waterbuck	Male	Two
Blue wildebeest	Male/Female	Three
Warthog	Male/female	Three
Crocodile	Male/Female	One
Zebra	Male /Female	Three
Eland	Male	Four
Kudu	Male	Three
Klipspringer	Male	Two
Elephant	Male	One

28 August 2017

E. Small


(b) (6)
(b) (6)
Feb 21, 2018
DATE
PAY TO THE ORDER OF U.S. Fish and Wildlife Service
$ 100.00
One Hundred and 00/100
DOLLARS
AUBURNBANK
FOR
(b) (6)
(b) (6)

CONSERVATION FORCE
A FORCE FOR WILDLIFE CONSERVATION

† BARON BERTRAND DES CLERS, PH.D.
† JAMES G TEER, PH.D.
† BART O'GARA, PH.D
† DON LINDSAY
† BERT KLINEBURGER

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March 28, 2018

U.S. Fish and Wildlife Service
Division of Management Authority (DMA)
Branch of Permits, MS: IA
5275 Leesburg Pike
Falls Church, VA 22041

RCVD MAR 30 2018

Re: Applications for Import of Sport-Hunted Trophies

Dear Acting Chief:

Enclosed please find two applications to import sport-hunted trophies.

- The first applicant is hunting an elephant on communal land in the Southeastern Lowveld range of Zimbabwe. The proceeds of this hunt benefit CAMPFIRE communities, as detailed in the various CAMPFIRE reports submitted to the DMA by Conservation Force, the Zimbabwe Parks and Wildlife Management Authority (ZPWMA), and the CAMPFIRE Association. Moreover, the elephant population in this range area in Zimbabwe is increasing, as reflected in the most recent survey reports. Please consider the enclosed documents and all information in the DMA's files regarding the benefits of elephant hunting in Zimbabwe in making a positive enhancement finding for this applicant.
- The second applicant is hunting an African lion in the Matetsi region of Zimbabwe with Martin Pieters Safaris. In April 2016, we provided significant enhancement information from this operator, and information about the increasing lion population in this area and the benefits of lion hunting in Zimbabwe was provided in the October 2016 non-detriment and enhancement finding from ZPWMA. Please consider that information, and all other information provided by Conservation Force, ZPWMA, Zimbabwean operators, and CAMPFIRE communities in making a positive enhancement finding for this applicant.

Please do not hesitate to contact us if you have questions about these applicants or need further information.

Sincerely,

Regina Lennox

3240 S I-10 Service Rd. W, Suite 200, Metairie, Louisiana 70001-6911, USA
Telephone: (504) 837-1233 • Fax (504) 837-1145 • E-mail: jjj@conservationforce.org
www.conservationforce.org

NOTICE OF REPRESENTATION

RCVD MAR 30 2018

This is a notice to the U.S. Fish and Wildlife Service that I have appointed John J. Jackson, III and Regina Lennox of the non-profit firm Conservation Force as my attorneys and legal representatives for all matters concerning my applications for a permit to import a lawfully hunted ___Bull Elephant___ trophy.

This authority is inclusive and extends to all applications and filings, whether administrative or judicial, including but not limited to any request for reconsideration, appeal, and litigation.

I also request that these attorneys, through the address for Conservation Force below, be copied with all correspondence, acknowledgements, notices and decisions concerning my application to import my trophy at the following address:

Conservation Force
3240 S. I-10 Service Road W., Suite 200
Metairie, Louisiana 70001 USA
T: (504) 837-1233
F: (504) 837-1145
E: cf@conservationforce.org

Signed: _____ (b) (6) _____

Name: Steven (b) (6) Reeves

Date: 7 March 2018

Form 3-200-20

Department of the Interior
U.S. Fish and Wildlife Service

Federal Fish and Wildlife Permit Application Form

OMB Control No 1018-0093
Expires Rev 08/31/2020

LB

RCVD MAR 30 2018

Return to: U.S. Fish and Wildlife Service
Division of Management Authority (DMA)
Branch of Permits, MS: IA
5275 Leesburg Pike
Falls Church, VA 22041-3803
1-800-358-2104 or 703-358-2104

Type of Activity:

IMPORT OF SPORT-HUNTED TROPHIES (Appendix I of CITES and/or ESA)

Complete Sections A or B, and C, D, and E of this application. U.S. address may be required in Section C, see instructions for details.
See attached instruction pages for information on how to make your application complete and help avoid unnecessary delays.

A. Complete if applying as an individual

1.a. Last name	1.b. First name	1.c. Middle name or initial	1.d. Suffix
Reeves	Steven	(b) (6)	

2. Date of birth (mm/dd/yyyy)	3. Telephone number	3.a. Alternate telephone number	4. E-mail address
(b) (6)			(b) (6)

B. Complete if applying on behalf of a business, corporation, public agency, Tribe, or institution

1.a. Name of business, agency, Tribe, or institution	1.b. Doing business as (dba)		
2. Tax identification no.	3. Description of business, agency, Tribe, or institution		
4.a. Principal officer Last name	4.b. Principal officer First name	4.c. Principal officer Middle name/ Initial	4.d. Suffix
5. Principal officer title	6. Primary contact name		
7.a. Business telephone number	7.b. Alternate telephone number	7.c. Business fax number	7.d. Business e-mail address

C. All applicants complete address information

1.a. Physical address (Street address; Apartment #, Suite #, or Room #; no P.O. Boxes) (If Broker or Taxidermist is applying on behalf of a foreign national, provide Broker or Taxidermist's name and address in this block; U.S. hunters must provide their U.S. address)

(b) (6)

1.b. City	1.c. State	1.d. Zip code/Postal code:	1.e. County/Province	1.f. Country
Hooper	UT	(b) (6)		USA

2.a. Mailing Address (include if different than physical address; include name of contact person if applicable)

2.b. City	2.c. State	2.d. Zip code/Postal code:	2.e. County/Province	2.f. Country

D. All applicants MUST complete

1. Attach check or money order payable to the U.S. FISH AND WILDLIFE SERVICE **in the amount of $100, nonrefundable processing fee**. Federal, Tribal, State, and local government agencies, and those acting on behalf of such agencies, are exempt from the processing fee – ***attach documentation of fee exempt status as outlined in instructions.*** (50 CFR 13.11(d))

2. Certification: I hereby certify that I have read and am familiar with the regulations contained in ***Title 50, Part 13 of the Code of Federal Regulations*** and the other ***applicable parts in subchapter B of Chapter I of Title 50***, and I certify that the information submitted in this application for a permit is complete and accurate to the best of my knowledge and belief. I understand that any false statement herein may subject me to the criminal penalties of 18 U.S.C. 1001.

(b) (6)

Signature of applicant/Principal Officer for permit (No photocopied or stamped signatures)

7 March 2018

Date of signature (mm/dd/yyyy)

Please continue to next page

E. IMPORT OF SPORT-HUNTED TROPHIES *(Appendix I of CITES and/or ESA)*

Note 1: This form should be used to request authorization to import trophies of species listed on Appendix I of CITES and/or as threatened or endangered under the ESA (examples include elephants, lions, cheetahs, wood bison, and markhor).

PLEASE USE FORM 3-200-19 FOR SOUTHERN AFRICAN LEOPARD TROPHIES AND SOUTHERN WHITE RHINOCEROS TROPHIES TAKEN IN NAMIBIA.

Note 2: If you hold an import permit for trophy/trophies that you did not use, please **return the unused original permit**. If you are requesting reissuance of a permit because you have taken a trophy, but were unable to import it prior to the expiration of the permit, please use the renewal form (3-200-52) and return your original permit with that form.

Note 3: Applications for species listed as endangered under the U.S. Endangered Species Act are published in the Federal Register for a 30-day public comment period. Please allow at least **90 days** for the application to be processed.

Note 4: *Sport-hunted trophy* is defined at 50 CFR 23.74 as follows: *Sport-hunted trophy* means a whole dead animal or a readily recognizable part or derivative of an animal specifically identified on the accompanying CITES document that meets the following criteria:
(1) Is raw, processed, or manufactured;
(2) Was legally obtained by the hunter through hunting for his or her personal use;
(3) Is being imported, exported, or re-exported by or on behalf of the hunter as part of the transfer from its country of origin ultimately to the hunter's country of usual residence; and
(4) Includes worked, manufactured, or handicraft items made from the sport-hunted animal only when:
(i) Such items are contained in the same shipment as raw or tanned parts of the sport-hunted animal and are for the personal use of the hunter;
(ii) The quantity of such items is no more than could reasonably be expected given the number of animals taken by the hunter as shown on the license or other documentation of the authorized hunt accompanying the shipment; and
(iii) The accompanying CITES documents (export document and, if appropriate, import permit) contain a complete itemization and description of all items included in the shipment.

Note 5: Certain hunting trophies, including elephants, are subject to restrictions on their use after import into the United States. Please see 50 CFR 23.55 for more information or contact the Division of Management Authority.

Please provide the following information. Complete all questions on the application. Mark questions that are not applicable with "N/A". If needed, use a separate sheet of paper. On all attachments or separate sheets you are submitting; please indicate the application question number you are addressing. If applying for more than one trophy, be sure to answer questions 1-6 for each trophy addressed in this application. If importing trophies from more than one country, you must submit a separate application for each shipment in order to obtain separate import permits.

---

1. Name and address where you wish the permit to be mailed, **if different from page 1**. If you would like expedited shipping, please enclose a self-addressed, pre-paid, computer-generated, courier service airway bill. If unspecified, all documents will be mailed via regular mail through the U.S. Postal Service.

2. Who should we contact if we have questions about the application (name, phone number, and e-mail)?

   Conservation Force, 504-837-1233, cf@conservationforce.org

3. Have you or your client (if a broker applying on behalf of your client), been assessed a civil penalty or convicted of any criminal provision of any statute or regulation relating to the activity for which the

application is filed; been convicted, or entered a plea of guilty or nolo contendere, for a felony violation of the Lacey Act, the Migratory Bird Treaty Act, or the Bald and Golden Eagle Protection Act; forfeited collateral; OR are currently under charges for any violation of the laws mentioned above?

No ✓ Yes ____

If you answered "Yes" to Question 3, provide: a) the individual's name; b) date of charge; c) charge(s); d) location of incident; e) court, and f) action taken for each violation. Please be aware that a "Yes" response does not automatically disqualify you from getting a permit.

4. For each trophy to be imported, provide:

   a. Scientific name (genus, species, and, if applicable, subspecies) and common name.
   LOXODONTA AFRICANA, ELEPHANT

   b. Sex (if known). MALE

5. **IF ANIMAL IS CURRENTLY LIVING IN THE WILD**, please enter the following information:

   a. Country and place (area, region, GIS coordinates, ranch, conservancy, management area, or hunting block, AND nearest city) where wildlife is to be taken from the wild:
   ZIMBABWE, SENGWE 1 + 2 TTL (CAMPFIRE AREAS)

   b. Date wildlife is to be hunted: APRIL 13-24, 2018

   b. Name of hunting outfitter, safari company, or professional hunter you will be hunting with:
   SSG SAFARIS, NIXON DZINGAI, OWNER + PH

6. **IF THE TROPHY HAS ALREADY BEEN TAKEN**, please enter the following:

   a. Country and place (area, region, GIS coordinates, ranch, conservancy, management area, or hunting block, AND nearest city) where trophy was removed from the wild:
   N/A

   b. Date wildlife was hunted:

   b. Name of hunting outfitter, safari company, or professional hunter you hunted with:

   c. The current location of the trophy (address and country) [the U.S. import permit will identify this country as the country of export/re-export and must match with the export/re-export document]:

7. Please provide a copy of any applicable foreign government permits or licenses that were required to remove this animal from the wild (if you have not hunted yet and do not currently hold any such permits or licenses, please indicate so). NOT YET ISSUED

8. Complete name and address of overseas person or business shipping the trophy to you. If you are applying to import a trophy directly from Namibia, you **must** provide the name and address of the professional hunter listed on your Namibian hunting permit [this name will appear on the face of the export permit].

   Name: SSG SAFARIS
   Business Name:
   Address:
   City:
   State/Province:
   Country, Postal Code:

9. For species listed under the Endangered Species Act, please be aware that the U.S. Fish and Wildlife Service must make a finding that your activities will enhance or benefit wild populations of the species involved. While we will communicate with the range country for the species you will hunt or hunted when making the required findings, if you have any information that could support this finding, it would be helpful to our review if you could provide it. Please submit such information on a separate page with your application.

   a. Do you have any information regarding the population status or trend data on the species hunted?

   PLEASE SEE ATTACHED + INFORMATION SUBMITTED BY CONSERVATION FOCUS + ZPWMA

   b. In order to hunt, you likely paid for licenses or trophy fees. What were those fees and do you have any information on how those funds were used by either the landowner, community, or government?

   SEE 9.A

   c. Do you have information on other funding activities that are being carried out, or were carried out, by the safari outfitter, professional hunter, concession holder, or land owner that provide a conservation benefit to the species being hunted/species hunted?

   SEE 9.A

CERTIFICATION STATEMENT (original signature must be provided for either 10 or 11 below)

10. **If you are a broker or taxidermist applying on behalf of a U.S. hunter or foreign national,** provide documentation to show you have a **Power of Attorney** to act on your client's behalf and sign the following statement.

    I acknowledge that the sport-hunted trophy/trophies to be imported has been/will be personally hunted by my client and is being imported only for my client's personal use (i.e., **not for sale, transfer, donation, or exchange that is reasonably likely to result in economic use, gain, or benefit**). I understand that my client may only import two leopard trophies and two elephant trophies within the same calendar year (if applicable). In addition, I have advised my client that raw ivory, once imported into the United States, cannot be re-exported.

    Taxidermist/Broker's signature: _____ Date: _____

11. **If you are the hunter applying to import your own trophy**, please read and sign the following statement.

    I acknowledge that the sport-hunted trophy/trophies to be imported has been/will be personally hunted by me and is being imported only for my personal use (i.e., **not for sale, transfer, donation, or exchange that is reasonably likely to result in economic use, gain, or benefit**). I understand that I may only import two leopard trophies and two elephant trophies within the same calendar year. In addition, I understand that raw ivory, once imported into the United States, cannot be re-exported.

    Applicant's signature: [redacted] (b) (6) Date: 7 March 201

    Be aware that there may be additional permitting or approval requirements by your local or state governments, as well as required by other Federal agencies or foreign government to conduct your propose activity. While the Service will attempt to assist where possible, it is your responsibility to obtain such approval.

All international shipment(s) must be imported through a designated port. A list of designated ports (where an inspector is posted) is available from http://www.fws.gov/le/designated-ports.html. If you wish to use a port not listed, please contact the Office of Law Enforcement for a Designated Port Exemption Permit (form 3-200-2).

Steven Reeves Permit Application

9. B:

This declaration is made by the Zimbabwean hunting operator:

We charge 1.400 USD per day on elephant hunts as our daily rate that broken down as follows:

15% of the daily rate goes to the hunting agent that books the hunt.

250 USD per day goes to the professional hunter that guides the hunt, this includes the clients hiring of his modern 4x4 hunting vehicle for purposes of the hunt.

We pay the fuel for the vehicle, usually around 50 litres per day @ 2 usd per litre in Zimbabwe = 100 USD

We use 2 trackers on elephant hunts @ 30 USD each per day daily rates = 60 USD per day.

We provide accommodation including housekeeping and a laundry service = 150 USD per day.

We cater for the clients' food and drinks including alcohol = 120 USD per day.

We provide a cook and a waitress plus kitchen cleaning staff @ 30 USD each per day x 4 = 120 USD per day.

We pay a Zimbabwe National Parks game scout to National Parks 75 USD per day to observe the hunt on behalf of the Government.

We feed all persons on the hunt not only the client.

We charge 15.500 USD for each elephant hunted.

We pay 12.500 USD of that amount to the local community on the following basis:

55% goes to the local rural African community that they use for schools, medical care, food, clothes roads and infrastructure.

4% goes to the campfire program, there is lots of information about the campfire project online: https://en.wikipedia.org/wiki/Communal_Areas_Management_Programme_for_Indigenous_Resources

41% goes to the Chiredzi Rural District Council (CRDC) this money is used by the council to increase/better the living conditions of the local people that live with these animals and suffer damages to their crops as a result of the human/animal conflict that exists in our areas and is getting worse year on year.

These trophy fee payments allow for the local people to be more tolerant of the animals that co-exist with them in these areas.

Steven Reeves Permit Application

9. C:

We employ 4 full time anti-poaching personnel who patrol the hunting area on a full time rotational basis to help stop poaching in our areas that for now we have under control, without these hunts our ability to perform anti poaching duties is impossible.

We employ 19 full time staff members that without our safari operation would be un-employed; the meat from our hunts gets distributed amongst the local people including the families of our staff at no charge at all, this much needed protein that would otherwise not be available at all, this is rural Africa.

The local people tolerate these elephants, buffalos and lions destroying their crops and cattle on the basis of the compensation agreements we have with them, if these animals were not paying their way they would not be tolerated in these areas by the locals due the damage they cause in the human/wild animal conflict.

It is of the utmost importance in terms of safe guarding the animals that the hunting operations and hunting operators are allowed to continue their work, or sadly these animals will all be destroyed by the locals.

We are an African based, African owned, African run Safari operation, we were born in these areas and have worked these areas all our lives and cared for the animals that exist here all our lives.

We do not hunt female or breeding animals at all; we hunt only the old males/old bulls.

Best regards

Nixon Dzingai (pictured below)

Owner: SSG Safaris:

Steven Reeves Permit Application

(b) (6)
9-07
7 March 2018
Date
$ 100.00
Dollars
Pay to the Order of
USFWS
One Hundred
EDUCATION FIRST
CREDIT UNION
1950 Country Hills Dr., Ogden, Utah 84403 (801) 399-4877
Hunt Trip
(b) (6)
(b) (6)
(b) (6)
ISLAND BREEZES

Form 3-200-20

OMB Control No. 1018-0093
Expires 08/31/2020

LB

RCVD MAR 30 2018

Department of Interior
U.S. Fish and Wildlife Service
Federal Fish and Wildlife Permit Application Form

U.S. Fish and Wildlife Service
Division of Management Authority
Branch of Permits, MS: IA
5275 Leesburg Pike
Falls Church, VA 22041-3803
1-800-358-2104 or 703-358-2104

Type of Activity

IMPORT OF SPORT-HUNTED TROPHIES (Appendix I of CITES and/or ESA)

Complete Sections A or B, and C, D, and E of this application. U.S. address may be required in Section C, see instructions for details.
You may find instructions on how to make your application complete and help avoid unnecessary delays at the following link: .

Section A: Complete if applying as an individual

1.a. Last Name	1.b. First Name	1.c. Middle Name/Initial	1.d. Suffix
MARTIN	HENRY	(b) (6)	

2. Date of Birth (mm/dd/yyyy)	3. Telephone Number	3.a. Alternate Telephone Number	4. E-mail address
(b) (6)			

Section B: Complete if applying on behalf of a business, corporation, public agency, Tribe, or institution

1.a. Name of business, agency, Tribe, or institution		1.b. Doing business as (DBA)	
2. Tax identification no.		3. Description of business, agency, Tribe, or institution	
4.a. Principal officer Last name	4.b. Principal officer First Name	4.c. Principal officer Middle name/initial	4.d. Suffix
5. Principal officer title		6. Primary contact name	
7.a. Business telephone number	7.b. Alternate telephone number	7.c. Business fax number	7.d. Business e-mail address

Section C: All applicants complete address information

1.a. Physical address: (b) (6)				
1.b. City	1.c. State	1.d. Zip code/Postal code	1.e. County/Province	1.f. Country
SAN ANTONIO	TEXAS	(b) (6)		U.S.A.
2.a. Mailing address (include if different than physical address; include name of c				
2.b. City	2.c. State	2.d. Zip code/Postal code	2.e. County/Province	2.f.Country

Section D: All applicants MUST complete

1. Attach check or money order payable to the U.S. FISH AND WILDLIFE SERVICE **in the amount identified on page 2, nonrefundable processing fee.** Federal, Tribal, State, and local government agencies, and those acting on behalf of such agencies, are exempt from the processing fee – *attach documentation of fee exempt status as outlined in instructions.* [50 CFR 13.11(d)]
2. Certification: I hereby certify that I have read and am familiar with the regulations contained in ***Title 50 Part 13 of the Code of Federal Regulations*** and the other ***applicable parts in subchapter B of Chapter I of Title 50***, and I certify that the information submitted in this application for a permit is complete and accurate to the best of my knowledge and belief. I understand that any false statement herein may subject me to the criminal penalties of 18 U.S.C. 1001.

H. (b) (6) — 3/24/2018

Signature of applicant/Principal Officer for permit (No photocopied or stamped signatures) Date of signature (mm/dd/yyyy)

Please continue to next page

E. IMPORT OF SPORT-HUNTED TROPHIES *(Appendix I of CITES and/or ESA)*

Note 1: This form should be used to request authorization to import trophies of species listed on Appendix I of CITES and/or as threatened or endangered under the ESA (examples include elephants, lions, cheetahs, wood bison, and markhor).

PLEASE USE FORM 3-200-19 FOR SOUTHERN AFRICAN LEOPARD TROPHIES AND SOUTHERN WHITE RHINOCEROS TROPHIES TAKEN IN NAMIBIA.

Note 2: If you hold an import permit for trophy/trophies that you did not use, please **return the unused original permit**. If you are requesting reissuance of a permit because you have taken a trophy, but were unable to import it prior to the expiration of the permit, please use the renewal form (3-200-52) and return your original permit with that form.

Note 3: Applications for species listed as endangered under the U.S. Endangered Species Act are published in the Federal Register for a 30-day public comment period. Please allow at least **90 days** for the application to be processed.

Note 4: *Sport-hunted trophy* is defined at 50 CFR 23.74 as follows: *Sport-hunted trophy* means a whole dead animal or a readily recognizable part or derivative of an animal specifically identified on the accompanying CITES document that meets the following criteria:

- Is raw, processed, or manufactured;
- Was legally obtained by the hunter through hunting for his or her personal use;
- Is being imported, exported, or re-exported by or on behalf of the hunter as part of the transfer from its country of origin ultimately to the hunter's country of usual residence; and
- Includes worked, manufactured, or handicraft items made from the sport-hunted animal only when:
  - i. Such items are contained in the same shipment as raw or tanned parts of the sport-hunted animal and are for the personal use of the hunter;
  - ii. The quantity of such items is no more than could reasonably be expected given the number of animals taken by the hunter as shown on the license or other documentation of the authorized hunt accompanying the shipment; and
  - iii. The accompanying CITES documents (export document and, if appropriate, import permit) contain a complete itemization and description of all items included in the shipment.

Note 5: Certain hunting trophies, including elephants, are subject to restrictions on their use after import into the United States. Please see 50 CFR 23.55 for more information or contact the Division of Management Authority.

Please provide the following information. Complete all questions on the application. Mark questions that are not applicable with "N/A". If needed, use a separate sheet of paper. On all attachments or separate sheets you are submitting; please indicate the application question number you are addressing. If applying for more than one trophy, be sure to answer questions 1-6 for each trophy addressed in this application. If importing trophies from more than one country, you must submit a separate application for each shipment in order to obtain separate import permits.

1. Name and address where you wish the permit to be mailed, if different from page 1. If you would like expedited shipping, please enclose a self-addressed, pre-paid, computer-generated, courier service airway bill. If unspecified, all documents will be mailed via the U.S. Postal Service.

2. Who should we contact if we have questions about the application (name, phone number, and e-mail)?

H. (b) (6) MARTIN

OMB Control No. 1018-0093
Expires 08/31/2020

3. Have you or your client (if a broker applying on behalf of your client), been assessed a civil penalty or convicted of any criminal provision of any statute or regulation relating to the activity for which the application is filed; been convicted, or entered a plea of guilty or nolo contendere, for a felony violation of the Lacey Act, the Migratory Bird Treaty Act, or the Bald and Golden Eagle Protection Act; forfeited collateral; OR are currently under charges for any violation of the laws mentioned above?

(No) Yes

If you answered "Yes" to Question 3, provide: a) the individual's name; b) date of charge; c) charge(s); d) location of incident; e) court, and f) action taken for each violation. Please be aware that a "Yes" response does not automatically disqualify you from getting a permit.

4. For each trophy to be imported, provide:

   a. Scientific name (genus, species, and, if applicable, subspecies) and common name.
   LOXODONTA AFRICANUS
   b. Sex (if known). MALE

5. **IF ANIMAL IS CURRENTLY LIVING IN THE WILD**, please enter the following information:

   a. Country and place (area, region, GIS coordinates, ranch, conservancy, management area, or hunting block, AND nearest city) where wildlife is to be taken from the wild:
   ZIMBABWE MASINGO HUMANI
   SAVE VALLEY LATITUDE 20° 28' 40.1 (20.4778°) SO
   CHIBUWE LONGITUDE 32° 14' 55.2 (32.2487)° EAS

   b. Date wildlife is to be hunted:
   SEPTEMBER 15, 2018

   c. Name of hunting outfitter, safari company, or professional hunter you will be hunting with:
   ROGER WHITTAL SAFARIS
   BUTCH COATON

6. IF THE TROPHY HAS ALREADY BEEN TAKEN, please enter the following:

   a. Country and place (area, region, GIS coordinates, ranch, conservancy, management area, or hunting block, AND nearest city) where trophy was removed from the wild:

   b. Date wildlife was hunted:

OMB Control No. 1018-0093
Expires 08/31/2020

c. Name of hunting outfitter, safari company, or professional hunter you hunted with:

d. The current location of the trophy (address and country) [the U.S. import permit will identify this country as the country of export/re-export and must match with the export/re-export document]:

7. Please provide a copy of any applicable foreign government permits or licenses that were required to remove this animal from the wild (if you have not hunted yet and do not currently hold any such permits or licenses, please indicate so). NOT HUNTED YET.

8. Complete name and address of overseas person or business shipping the trophy to you. If you are applying to import a trophy directly from Namibia, you must provide the name and address of the professional hunter listed on your Namibian hunting permit [this name will appear on the face of the export permit].

   Name:
   Business Name:
   Address:
   City:
   State/Province:
   Country, Postal Code:

9. For species listed under the Endangered Species Act, please be aware that the U.S. Fish and Wildlife Service must make a finding that your activities will enhance or benefit wild populations of the species involved. While we will communicate with the range country for the species you will hunt or hunted when making the required findings, if you have any information that could support this finding, it would be helpful to our review if you could provide it. Please submit such information on a separate page with your application.

   a. Do you have any information regarding the population status or trend data on the species hunted?
   NO

   b. In order to hunt, you likely paid for licenses or trophy fees. What were those fees and do you have any information on how those funds were used by either the landowner, community, or government?
   N/A

   c. Do you have information on other funding activities that are being carried out, or were carried out, by the safari outfitter, professional hunter, concession holder, or land owner that provide a conservation benefit to the species being hunted/species hunted
   NO

OMB Control No. 1018-0093
Expires 08/31/2020

CERTIFICATION STATEMENT (original signature must be provided for either 10 or 11 below)

10. If you are a broker or taxidermist applying on behalf of a U.S. hunter or foreign national, provide documentation to show you have a Power of Attorney to act on your client's behalf and sign the following statement.

I acknowledge that the sport-hunted trophy/trophies to be imported has been/will be personally hunted by my client and is being imported only for my client's personal use (i.e., not for sale, transfer, donation, or exchange that is reasonably likely to result in economic use, gain, or benefit). If applying for the import of a leopard trophy, I understand that my client may only import two leopard trophies in one calendar year.

Taxidermist/Broker's signature: _____ Date: _____

11. If you are the hunter applying to import your own trophy, please read and sign the following statement.

I acknowledge that the sport-hunted trophy/trophies to be imported has been/will be personally hunted by me and is being imported only for my personal use (i.e., not for sale, transfer, donation, or exchange that is reasonably likely to result in economic use, gain, or benefit). If applying to import a leopard trophy, I understand that I may only import two leopard trophies in one calendar year.

Applicant's signature: [redacted] Date: MARCH 24, 2018

Be aware that there may be additional permitting or approval requirements by your local or state governments, as well as required by other Federal agencies or foreign government to conduct your propose activity. While the Service will attempt to assist where possible, it is your responsibility to obtain such approval.

12. All international shipment(s) must be through a designated port. A list of designated ports (where an inspector is posted) is available from **the list of designated ports**. If you wish to use a port not listed, please contact the Office of Law Enforcement for a Designated Port Exemption Permit (form 3-200-2).

[redacted] (6) (6)

[redacted] (6) (6)

MARCH 24 2018
Date

Pay To The Order Of U.S. FISH AND WILDLIFE $ 100.00

ONE HUNDRED [redacted]
Dollars

Frost
www.frostbank.com

For ELEPHANT IMPORT [redacted] (6) (6)

Signature Checking

[redacted] (6) (6)

RCVD FEB 9 2018

ALL U.S. CITES ARE TO BE MAILED TO:

D&L CHB, LLC

1500 MIDWAY COURT,

STE W201

ELK GROVE VILLAGE, IL 60007

PLEASE NOTE THAT SECTION 9 DOES ASK WHERE TO MAIL AND WE DO FILL IN TO MAIL TO D&L

THANK YOU!

RCVD FEB 9 2018

Department of the Interior
U.S. Fish and Wildlife Service

OMB No. 1018-0093
Expires 05/31/2017

Federal Fish and Wildlife Permit Application Form

Return to: U.S. Fish and Wildlife Service
Division of Management Authority (DMA)
Branch of Permits, MS: IA
5275 Leesburg Pike
Falls Church, VA 22041-3803
1-800-358-2104 or 703-358-2104

Type of Activity:
Import of Sport-hunted Trophies of Southern African Leopard, African Elephant, and Namibian Southern White Rhinoceros

Complete Sections A or B, and C, D, and E of this application. U.S. address may be required in Section C, see instructions for details.
See attached instruction pages for information on how to make your application complete and help avoid unnecessary delays.

A. Complete if applying as an individual

1 a. Last name	1 b. First name	1 c. Middle name or initial	1 d. Suffix
Pahlau	Richard		

2. Date of birth (mm/dd/yyyy)	3. Social Security No.	4. Occupation	5. Affiliation/ Doing business as (see instructions)
(b) (6)			

6 a. Telephone number	6 b. Alternate telephone number	6 c. Fax number	6 d. E-mail address
(b) (6)		847-690-0699	laura.durgin@dlchb.com

B. Complete if applying on behalf of a business, corporation, public agency, Tribe, or institution

1 a. Name of business, agency, Tribe, or institution	1 b. Doing business as (dba)

2. Tax identification no.	3. Description of business, agency, Tribe, or institution

4 a. Principal officer Last name	4 b. Principal officer First name	4 c. Principal officer Middle name/ initial	4 d. Suffix

5. Principal officer title	6. Primary contact name

7 a. Business telephone number	7 b. Alternate telephone number	7 c. Business fax number	7 d. Business e-mail address

C. All applicants complete address information

1 a. Physical address (Street address, Apartment #, Suite #, or Room #, no P.O. Boxes)
(b) (6)

1 b. City	1 c. State	1 d. Zip code/Postal code	1 e. County/Province	1 f. Country
Massillon	OH	(b) (6)		U.S.A.

2 a. Mailing Address (include if different than physical address; include name of contact person if applicable)

2 b. City	2 c. State	2 d. Zip code/Postal code	2 e. County/Province	2 f. Country

D. All applicants MUST complete

1. Attach check or money order payable to the U.S. FISH AND WILDLIFE SERVICE **in the amount of $100, nonrefundable processing fee**. Federal, Tribal, State, and local government agencies, and those acting on behalf of such agencies, are exempt from the processing fee – ***attach documentation of fee exempt status as outlined in instructions.*** (50 CFR 13.11(d))

2. Do you currently have or have you ever had any Federal Fish and Wildlife permits?
Yes ☐ If yes, list the number of the most current permit you have held or that you are applying to renew/re-issue: _____ No ☒

3. Certification. I hereby certify that I have read and am familiar with the regulations contained in ***Title 50, Part 13 of the Code of Federal Regulations*** and the other ***applicable parts in subchapter B of Chapter I of Title 50***, and I certify that the information submitted in this application for a permit is complete and accurate to the best of my knowledge and belief. I understand that any false statement herein may subject me to the criminal penalties of 18 U.S.C. 1001.

Laura Durgin — 1/31/2018

Signature (in blue ink) of applicant/person responsible for permit (No photocopied or stamped signatures) — Date of signature (mm/dd/yyyy)

Please continue to next page

E. IMPORT OF SPORT-HUNTED TROPHIES OF SOUTHERN AFRICAN LEOPARD, AFRICAN ELEPHANT, AND NAMIBIAN SOUTHERN WHITE RHINOCEROS

Note 1: If you hold an import permit for trophy/trophies that you did not use, please **return the unused original permit.** If you are requesting reissuance of a permit because you have taken a trophy, but were unable to import it prior to the expiration of the permit, please use the renewal form (3-200-52; http://www.fws.gov/international/permits/by-form-number/index.html) and return your original permit with that form.

Note 2: The U.S. FWS has determined that a trophy consists of raw or tanned parts of a specimen taken by a hunter during a sport hunt for personal use. It may include the bones, claws, hair, head, hide, hooves, horns, meat, skull, teeth, tusks, or any taxidermied part, including, but not limited to, a rug or taxidermied head, shoulder, or full mount. It does not include articles made from a trophy, such as worked, manufactured, or handicraft items for use as clothing, curios, ornamentation, jewelry, or other utilitarian items. If you wish to import such products, please contact the Division of Management Authority for the proper application form.

Note 3: Certain hunting trophies, including leopard, elephant, and rhinoceros hunting trophies, are subject to restrictions on their use after import into the United States. Please see 50 CFR 23.55 for more information or contact the Division of Management Authority.

Please provide the following information. Complete all questions on the application. Mark questions that are not applicable with "N/A". If applying for more than one trophy, be sure to answer questions 2 and 3 for each trophy. If importing trophies from more than one country, you must submit a separate application for each shipment in order to obtain separate import permits.

1. ENTER the quantity next to the name of the species you are applying to import (you may apply to import specimens of more than one species provided they have been/are being hunted in the same country):

Leopard (*Panthera pardus*) Quantity: N/A (Limited to the import of two per calendar year)

African elephant (*Loxodonta africana*) Quantity: 2 (Import permit is not required for trophies harvested in Botswana, Namibia, South Africa, or Zimbabwe). **Note: once imported, ivory cannot be re-exported.**

Southern white rhinoceros (*Ceratotherium simum simum*) from Namibia Quantity: N/A (An import permit is not required for trophies harvested in South Africa or Swaziland. If you are looking to import from a different country, please use form 3-200-37).

2. **IF ANIMAL IS CURRENTLY LIVING IN THE WILD**, please enter the following:
   a. Country and place (area, region, GIS coordinates, ranch AND nearest city) where wildlife is to be taken from the wild: N/A
   b. Date wildlife is to be hunted: N/A
   c. Description of the trophy and parts you intend to import (e.g., skin, skull, shoulder mount, life size mount, claws, horns, tusks). N/A

3. **IF THE ANIMAL IS DEAD**, please enter the following:
   a. Country and place (area, region, GIS coordinates, ranch, and/or AND nearest city) where trophy was removed from the wild: 1/ Divunda Natl Park, Namibia 2/ Bwabwata West, Katima Mal. IV
   b. Date wildlife was hunted:
      1/ 06/10/2017
      2/ 06/11/2017

c. Description of the trophy and parts you intend to import (e.g., skin, skull, shoulder mount, life size mount, claws, horn, tusks): 4 TUSKS, SKIN, 2 Feet

d. The current location of the trophy (address and country) [the U.S. import permit will identify this country as the country of export/re-export and must match with the export/re-export document]:

Trophaendienst
Box 21068
Windhoek Namibia

4. Complete name and address of overseas person or business shipping the trophy to you. If you are applying to import a trophy directly from Namibia, you **must** provide the name and address of the professional hunter listed on your Namibian hunting permit [this name will appear on the face of the export permit].

Name: J.H. Pienaar
Business Name:
Address: Private Bag 2105
Address:
City: Gobabis
State/Province: Namibia
Country, Postal Code:

5. Please be aware that the U.S. Fish and Wildlife Service may need to make a finding that your activities will enhance or benefit wild populations of the species involved. If you have any information that could support this finding (e.g., how the funds from license/trophy fees will be spent, what portion of the hunting fee will support conservation), please submit such information on a separate page with your application.

CERTIFICATION STATEMENT (original signature must be provided for either 6 or 7 below)

6. **If you are a broker or taxidermist applying on behalf of a foreign national,** provide documentation to show you have a **Power of Attorney** to act on your client's behalf and sign the following statement.

I acknowledge that the sport-hunted trophy/trophies to be imported has been/will be personally hunted by my client and is being imported only for my client's personal use (i.e., **not for sale, transfer, donation, or exchange that is reasonably likely to result in economic use, gain, or benefit**). I understand that my client may only import two leopard trophies in one calendar year (if applicable). In addition, I have advised my client that raw ivory, once imported into the United States, cannot be re-exported.

Taxidermist/Broker's signature: Laura Durgin Date: 1/31/2018

7. **If you are the hunter applying to import your own trophy**, please read and sign the following statement.

I acknowledge that the sport-hunted trophy/trophies to be imported has been/will be personally hunted by me and is being imported only for my personal use (i.e., **not for sale, transfer, donation, or exchange that is reasonably likely to result in economic use, gain, or benefit**). I understand that I may only import two leopard trophies in one calendar year (if applicable). In addition, I understand that raw ivory, once imported into the United States, cannot be re-exported.

Applicant's signature: _____ Date: _____

Be aware that there may be additional permitting or approval requirements by your local or state governments, as well as required by other Federal agencies or foreign government to conduct your propose activity. While the Service will attempt to assist where possible, it is your responsibility to obtain such approval.

8. All international shipment(s) must be through a designated port. A list of designated ports (where an inspector is posted) is available from http://www.fws.gov/le/designated-ports.html. If you wish to use a port not listed, please contact the Office of Law Enforcement for a Designated Port Exemption Permit (form 3-200-2).

Chicago, IL

9. Name and address where you wish the permit to be mailed, if different from page 1 (All permits will be mailed via the U.S. Postal Service, unless you identify an alternative means below):

D&L CHB
1500 Midway Ct.
Ste W201
Elk Grove Village, IL 60007

10. If you wish the permit to be delivered by means other than USPS regular mail, provide an air bill, pre-paid envelope, or billing information. If you do not have a pre-paid envelope or air bill and wish to pay for a courier service with your credit card, please check the box below. Please DO NOT include credit card number or other information; you will be contacted for this information. N/A

☐ If a permit is issued, please send it via a courier service to the address on page 1 or question 9. I understand that you will contact me for my credit card information once the application has been processed.

11. Who should we contact if we have questions about the application? (Include name, phone number, and email):

Laura Durgin
847-690-0690 laura.durgin@dlchb.com

12. **Disqualification Factor.** A conviction, or entry of a plea of guilty or nolo contendere, for a felony violation of the Lacey Act, the Migratory Bird Treaty Act, or the Bald and Golden Eagle Protection Act disqualifies any such person from receiving or exercising the privileges of a permit, unless such disqualification has been expressly waived by the Service Director in response to a written petition. (50 CFR 13.21(c)) Have you or any of the owners of the business, if applying as a business, been convicted, or entered a plea of guilty or nolo contendere, forfeited collateral, or are currently under charges for any violations of the laws mentioned above?

☐ Yes ☒ No If you answered "Yes" provide: a) the individual's name, b) date of charge, c) charge(s), d) location of incident, e) court, and f) action taken for each violation.

#9032

CUSTOMS POWER OF ATTORNEY
and
Acknowledgement of Terms and Conditions of Service

Copyright 1995 National Customs Brokers and Forwarders Association of America, Inc.
(Revised 07/04)

✓ appropriate box:

- [x] Individual
- [ ] Partnership
- [ ] Corporation
- [ ] Sole Proprietorship
- [ ] Limited Liability Company

SS# (b) (6) [redacted]

KNOW ALL MEN BY THESE PRESENTS: That, ✓ Richard (b) (6) Pahlau (Full name of individual, partnership, corporation, sole proprietorship, or limited liability company) (Identity) doing business as a ✓ INDIVIDUAL (Individual, partnership, corporation, sole proprietorship) under the laws of the State of ✓ Ohio, residing or having a principal place of business at ✓ (b) (6) [redacted], Massillon, OH (b) (6) hereby constitutes and appoints ✓ D & L CHB (Grantee's Name), its officers, employees, and/or specifically authorized agents, to act for and on its behalf as a true and lawful agent and attorney of the grantor for and in the name, place and stead of said grantor, from this date, in the United States (the "territory") either in writing, electronically, or by other authorized means, to:

Make, endorse, sign, declare, or swear to any customs entry, withdrawal, declaration, certificate, bill of lading, carnet or any other documents required by law or regulation in connection with the importation, exportation, transportation, of any merchandise in or through the customs territory, shipped or consigned by or to said grantor;

Perform any act or condition which may be required by law or regulation in connection with such merchandise deliverable to said grantor; to receive any merchandise;

Make endorsements on bills of lading conferring authority to transfer title; make entry or collect drawback; and to make, sign, declare, or swear to any statement or certificate required by law or regulation for drawback purposes, regardless of whether such document is intended for filing with U.S. Customs and Border Protection;

Sign, seal, and deliver for and as the act of said grantor any bond required by law or regulation in connection with the entry or withdrawal of imported merchandise or merchandise exported with or without benefit of drawback, or in connection with the entry, clearance, lading, unlading or navigation of any vessel or other means of conveyance owned or operated by said grantor, and any and all bonds which may be voluntarily given and accepted under applicable laws and regulations, consignee's and owner's declarations provided for in section 485, Tariff Act of 1930, as amended, or affidavits or statements in connection with the entry of merchandise;

Sign and swear to any document and to perform any act that may be necessary or required by law or regulation in connection with the entering, clearing, lading, unlading, or operation of any vessel or other means of conveyance owned or operated by said grantor;

Authorize other Customs Brokers duly licensed within the territory to act as grantor's agent; to receive, endorse and collect checks issued for CBP duty refunds in grantor's name drawn on the Treasurer of the United States if the grantor is a nonresident of the United States, to accept service of process on behalf of the grantor;

And generally to transact Customs business, including filing of claims or protests under section 514 of the Tariff Act of 1930, or pursuant to other laws of the territories, in which said grantor is or may be concerned or interested and which may properly be transacted or performed by an agent and attorney;

Giving to said agent and attorney full power and authority to do anything whatever requisite necessary to be done in the premises as fully as said grantor could do if present and acting, hereby ratifying and confirming all that the said agent and attorney shall lawfully do by virtue of these presents;

This power of attorney to remain full force and effect until revocation in writing is duly given to and received by grantee (if the donor of this power of attorney is a partnership, the said power shall in no case have any force or effect in the United States after the expiration 2 years from the dates of its execution);

Grantor acknowledges receipt of ✓ D & L CHB (Grantee's Name) Terms and Conditions of Service governing all transactions between the Parties.

If the Grantor is a Limited Liability Company, the signatory certifies that he/she has full authority to execute this power on behalf of the Grantor.

IN WITNESS WHEREOF, the said ✓ Richard (b) (6) Pahlau (Full name of individual, partnership, corporation, sole proprietorship, or limited liability company)

caused these presents to be sealed and signed: (Signature) ✓ Richard (b) (6) Pahlau

(Capacity) ✓ N/A Date: 03/23/2017

Witness: (if required) N/A

If you are the importer of record, payment to the broker will not relieve you of liability for CBP charges (duties, taxes or other debts owed CBP) in the event the charges are not paid by the broker. Therefore, if you pay by check, CBP charges may be paid with a separate check payable to "U.S. Customs and Border Protection" which shall be delivered to CBP by the broker. Importers who wish to utilize this procedure must contact our office in advance to arrange timely receipt of duty checks.

APPERSON PRINT MANAGEMENT SERVICES • NCBFAA-3 • WHSE. NO. 03540

(b) (6)
(b) (6)

RCVD FEB 9 2018

D&L CHB, LLC
1500 MIDWAY CT. W201
ELK GROVE VILLAGE, IL 60007

BANK ONE
CHICAGO, IL 60670
2-1-710

DATE	CHECK NUMBER
02/07/18	(b) (4)

PAY **********100DOLLARS&00CENTS

CHECK AMOUNT
$100.00**

PAY TO THE ORDER OF:

FISH &_WILDLIFE

IL

(b) (4)

Department of the Interior
U.S. Fish and Wildlife Service

OMB No. 1018-0164
Expires 11/30/2016

Federal Fish and Wildlife Permit Application Form

Return to: U.S. Fish and Wildlife Service
Division of Management Authority (DMA)
Branch of Permits, MS: IA
5275 Leesburg Pike
Falls Church, VA 22041-3803
1-800-358-2104 or 703-358-2104

Type of Activity:
Import of Sport-hunted Trophies of
Southern African Leopard, African Elephant, and
Namibian Southern White Rhinoceros

RCVD JUL 18 2016

Complete Sections A or B, and C, D, and E of this application. U.S. address may be required in Section C, see instructions for details.
See attached instruction pages for information on how to make your application complete and help avoid unnecessary delays.

A. Complete if applying as an individual

1.a. Last name	1.b. First name	1.c. Middle name or initial	1.d. Suffix
Milam	Robert	(b) (6)	

2. Date of birth (mm/dd/yyyy)	3. Occupation	4. Affiliation/ Doing business as (see instructions)
(b) (6)		

5.a. Telephone number	5.b. Alternate telephone number	5.c. Fax number	5.d. E-mail address
(b) (6)			(b) (6)

B. Complete if applying on behalf of a business, corporation, public agency, Tribe, or institution

1.a. Name of business, agency, Tribe, or institution	1.b. Doing business as (dba)

2. Tax identification no	3. Description of business, agency, Tribe, or institution

4.a. Principal officer Last name	4.b. Principal officer First name	4.c. Principal officer Middle name/ initial	4.d. Suffix

5. Principal officer title	6. Primary contact name

7.a. Business telephone number	7.b. Alternate telephone number	7.c. Business fax number	7.d. Business e-mail address

C. All applicants complete address information

1.a. Physical address (Street address; Apartment #, Suite #, or Room #; no P.O. Boxes)
(b) (6)

1.b. City	1.c. State	1.d. Zip code/Postal code	1.e. County/Province	1.f. Country
Midland	Texas	(b) (6)		U.S.A.

2.a. Mailing Address (include if different than physical address, include name of contact person if applicable)

2.b. City	2.c. State	2.d. Zip code/Postal code	2.e. County/Province	2.f. Country

D. All applicants MUST complete

1. Attach check or money order payable to the U.S. FISH AND WILDLIFE SERVICE **in the amount of $100, nonrefundable processing fee** Federal, Tribal, State, and local government agencies, and those acting on behalf of such agencies, are exempt from the processing fee – ***attach documentation of fee exempt status as outlined in instructions.*** (50 CFR 13.11(d))

2. Do you currently have or have you ever had any Federal Fish and Wildlife permits?
Yes ☐ If yes, list the number of the most current permit you have held or that you are applying to renew/re-issue _____ No ☑

3. Certification I hereby certify that I have read and am familiar with the regulations contained in ***Title 50, Part 13 of the Code of Federal Regulations*** and the other ***applicable parts in subchapter B of Chapter I of Title 50***, and I certify that the information submitted in this application for a permit is complete and accurate to the best of my knowledge and belief. I understand that any false statement herein may subject me to the criminal penalties of 18 U.S.C. 1001.

(b) (6) Robert Milam — 7/15/16

Signature of applicant/person responsible for permit (No photocopied or stamped signatures) — Date of signature (mm/dd/yyyy)

Please continue to next page

E. IMPORT OF SPORT-HUNTED TROPHIES OF SOUTHERN AFRICAN LEOPARD, AFRICAN ELEPHANT, AND NAMIBIAN SOUTHERN WHITE RHINOCEROS

Note 1: If you hold an import permit for a trophy/trophies that you did not use, please **return the unused original permit.** If you are requesting reissuance of a permit because you have taken a trophy, but were unable to import it prior to the expiration of the permit, please use the renewal form (3-200-52; http://www.fws.gov/international/permits/by-form-number/index.html) and return your original permit with that form.

Note 2: *Sport-hunted trophy* is defined at 50 CFR 23.74 as follows: *Sport-hunted trophy* means a whole dead animal or a readily recognizable part or derivative of an animal specifically identified on the accompanying CITES document that meets the following criteria:

(1) Is raw, processed, or manufactured;
(2) Was legally obtained by the hunter through hunting for his or her personal use;
(3) Is being imported, exported, or re-exported by or on behalf of the hunter as part of the transfer from its country of origin ultimately to the hunter's country of usual residence; and
(4) Includes worked, manufactured, or handicraft items made from the sport-hunted animal only when:
(i) Such items are contained in the same shipment as raw or tanned parts of the sport-hunted animal and are for the personal use of the hunter;
(ii) The quantity of such items is no more than could reasonably be expected given the number of animals taken by the hunter as shown on the license or other documentation of the authorized hunt accompanying the shipment; and
(iii) The accompanying CITES documents (export document and, if appropriate, import permit) contain a complete itemization and description of all items included in the shipment.

Note 3: Certain hunting trophies, including leopard, elephant, and rhinoceros hunting trophies, are subject to restrictions on their use after import into the United States. Please see 50 CFR 23.55 for more information or contact the Division of Management Authority.

Please provide the following information. Complete all questions on the application. Mark questions that are not applicable with "N/A". If applying for more than one trophy, be sure to answer questions 2 and 3 for each trophy.

If importing trophies from more than one country, you must submit a separate application for each shipment in order to obtain separate import permits.

1. ENTER the quantity next to the name of the species you are applying to import (you may apply to import specimens of more than one species provided they have been/are being hunted in the same country):

Leopard (*Panthera pardus*) Quantity:_____(Import is limited to two per hunter per calendar year)

African elephant (*Loxodonta africana*) Quantity:__1__(Import is limited to two per hunter per calendar year)
Note: once imported, ivory cannot be re-exported.

Southern white rhinoceros (*Ceratotherium simum simum*) from Namibia Quantity:_____ (An import permit is not required for trophies harvested in South Africa or Swaziland. If you wish to import from a different country, please use form 3-200-37).

2. **IF ANIMAL IS CURRENTLY LIVING IN THE WILD**, please enter the following:
   a. Country and place (area, region, GIS coordinates, ranch AND nearest city) where wildlife is to be taken from the wild:

   b. Date wildlife is to be hunted:

c. Description of the trophy and parts you intend to import (e.g., skin, skull, shoulder mount, life size mount, claws, horns, tusks).

3. **IF THE ANIMAL IS DEAD**, please enter the following:
   a. Country and place (area, region, GIS coordinates, ranch, and/or AND nearest city) where trophy was removed from the wild: DE BEERS MINES, 36 STOCKDALE ROAD, KIMBERLY 8301, RSA
   b. Date wildlife was hunted: 03/30/2016
   c. Description of the trophy and parts you intend to import (e.g., skin, skull, shoulder mount, life size mount, claws, horn, tusks):

      skin (tanned), skull, four leg stools, tusks, ear (tanned w/artwork)

   d. The current location of the trophy (address and country) [the U.S. import permit will identify this country as the country of export/re-export and must match with the export/re-export document]:

      Safari Taxidermy, 47 Goud Street, Laboria, Polokwane, RSA

4. Complete name and address of overseas person or business shipping the trophy to you. If you are applying to import a trophy directly from Namibia, you **must** provide the name and address of the professional hunter listed on your Namibian hunting permit [this name will appear on the face of the export permit].

Name: Business Name:	Safari Taxidermy
Address:	47 Goud street
City:	Laboria, Polokwane
State/Province:	
Country, Postal Code:	RSA, 0704

5. Please be aware that the U.S. Fish and Wildlife Service may need to make a finding that your activities will enhance or benefit wild populations of the species involved. If you have any information that could support this finding (e.g., how the funds from license/trophy fees will be spent, what portion of the hunting fee will support conservation), please submit such information on a separate page with your application.

CERTIFICATION STATEMENT (original signature must be provided for either 6 or 7 below)

6. **If you are a broker or taxidermist applying on behalf of a foreign national,** provide documentation to show you have a **Power of Attorney** to act on your client's behalf and sign the following statement.

   I acknowledge that the sport-hunted trophy/trophies to be imported has been/will be personally hunted by my client and is being imported only for my client's personal use (i.e., **not for sale, transfer, donation, or exchange that is reasonably likely to result in economic use, gain, or benefit**). I understand that my client may only import two leopard trophies in one calendar year. I understand that my client may only import two African elephant trophies in one calendar year. In addition, I have advised my client that raw ivory, once imported into the United States, cannot be re-exported.

   Taxidermist/Broker's signature:_____ Date: _____

7. **If you are the hunter applying to import your own trophy**, please read and sign the following statement.

I acknowledge that the sport-hunted trophy/trophies to be imported has been/will be personally hunted by me and is being imported only for my personal use (i.e., **not for sale, transfer, donation, or exchange that is reasonably likely to result in economic use, gain, or benefit**). I understand that I may only import two leopard trophies in one calendar year. I understand that I may only import two African elephant trophies in one calendar year. In addition, I understand that raw ivory, once imported into the United States, cannot be re-exported.

Applicant's signature: Robert (b) (6) Milam Date: 7/15/16

Be aware that there may be additional permitting or approval requirements by your local or state governments, as well as required by other Federal agencies or foreign government to conduct your propose activity. While the Service will attempt to assist where possible, it is your responsibility to obtain such approval.

8. All international shipment(s) must be through a designated port. A list of designated ports (where an inspector is posted) is available from http://www.fws.gov/le/designated-ports.html. If you wish to use a port not listed, please contact the Office of Law Enforcement for a Designated Port Exemption Permit (form 3-200-2).

9. Name and address where you wish the permit to be mailed, **if** different from page 1 (All permits will be mailed via the U.S. Postal Service, unless you identify an alternative means below):

10. If you wish the permit to be delivered by means other than USPS regular mail, provide an air bill, pre-paid envelope, or billing information. If you do not have a pre-paid envelope or air bill and wish to pay for a courier service with your credit card, please check the box below. Please DO NOT include credit card number or other information; you will be contacted for this information.

☐ If a permit is issued, please send it via a courier service to the address on page 1 or question 9. I understand that you will contact me for my credit card information once the application has been processed.

11. Who should we contact if we have questions about the application? (Include name, phone number, and email):

Robe(b) (6) Milam, (b) (6) [redacted]

12. **Disqualification Factor.** A conviction, or entry of a plea of guilty or nolo contendere, for a felony violation of the Lacey Act, the Migratory Bird Treaty Act, or the Bald and Golden Eagle Protection Act disqualifies any such person from receiving or exercising the privileges of a permit, unless such disqualification has been expressly waived by the Service Director in response to a written petition. (50 CFR 13.21(c)) Have you or any of the owners of the business, if applying as a business, been convicted, or entered a plea of guilty or nolo contendere, forfeited collateral, or are currently under charges for any violations of the laws mentioned above?

☐ Yes ☑ No If you answered "Yes" provide: a) the individual's name, b) date of charge, c) charge(s), d) location of incident, e) court, and f) action taken for each violation.

SOUTH AFRICAN PROFESSIONAL HUNTING REGISTER AND TROPHY EXPORT APPLICATION

No. 5833

Duration of Hunt Commenced 23 / 03 / 2016 Terminated 24 / 03 / 2016

Tick appropriate Province block where hunt took place (separate sheet for each province)

KwaZulu-Natal (KZN)	Free State (FS)	Gauteng (GP)	Northern Province (NP)	North West (NW)	Mpumalanga (MPA)	Western Cape (CNC)	Eastern Cape (EC)	Northern Cape (NC)
			X					

Post Permit to (mark correct block with X)

PROFESSIONAL HUNTER

Name: Kuba Ampurg

Business Address: P.O. Box 13175

Cascades Code: 3202

I.D. No: 7206205073083

PH Permit No: 0078 - PA2001 - 00073

Date: 21/03/16 Signature: K. Ampurg

CLIENT

Name: Robert [redacted]

Permanent Postal Address [redacted]

Midland, TX

Code: [redacted] Country: USA

Passport No. [redacted]

Tel/Fax: [redacted]

Date: Signature:

HUNTING OUTFITTER X

Name: Jaco Arcuman

Business Address: P.O. Box 13175

Cascades Code: 3202

I.D. No: 6404015076085

Tel No: 027 341 2014 Fax No: 27 341 2015

PH Permit No: 0077 - CA2001 - 00076

Date 14-04-2016 Signature:

Farm Name Registration No.	Magisterial District	Name & Residential Address of Land Owner	Hunting Permit Certificate/Licence No.	Date Killed/ Wounded	Species Killed or Wounded	Number Killed or Wounded	Sex F	Sex M	Conservation Levy	Parts of Trophy to be Exported
Veratia Owaps Private Reserve	Musina	De Beers Mines 36 Stockdale Road Kimberley 8301	0139619 (NWK 60/2016)	20/03	Elephant	01		X	-	Skull & Tusks, Tail, Trunk, 4 Panels, 4 Feet

Copies: Client Original White

1st Copy Pink Forward to Nature conservation authority where hunt took place

Hunting Outfitter 2nd Copy Blue Retain for a period of three years

Taxidermist 3rd Copy Green Taxidermist

Professional Hunter Last Copy Yellow Remains in book

NB: A voluntary charge of $10 or €10 is levied for every trophy taken

Address to which trophies are to be sent: Safari Taxidermy - Pietermaritzburg

Country: RSA Code:

Trophy Export Date (Estimate):

VHJ 60/2016

ORDINARY PERMIT

PERMIT NUMBER: O № 13969

(Issued in terms of the provisions of the National Environmental Management: Biodiversity Act 2004, Act 10 of 2004)

NAME	ENVIRONMENTAL AFFAIRS
ADDRESS	MUSINA
PROVINCE	LIMPOPO

DETAILS OF PERMIT HOLDER

NAME	MR. ROBERT (b) (6)	ID NO.	
SURNAME	MILLAM	PASSPORT NO.	(b) (6)

	POSTAL ADDRESS	RESIDENTIAL ADDRESS
ADDRESS		
ADDRESS		
ADDRESS		(b) (6)
TOWN		MILAM, TEXAS
POSTAL CODE		(b) (6)
PROVINCE		USA

PROPERTY WHERE RESTRICTED ACTIVITIES WILL BE CARRIED OUT

NAME AND SURNAME OF APPLICANT	MR. JOHANNES ERASMUS WILLIE TALJOARD
NAME AND SURNAME: RESPONSIBLE PERSON	MR. RUDE MARAIS
NAME AND SURNAME OF AGENT	
PHYSICAL ADDRESS OF FACILITY	
PHYSICAL ADDRESS OF FACILITY	
DISTRICT	VHEMBE
PROVINCE	LIMPOPO
REGISTERED NAME AND NUMBER (in the case of game farm)	VENETIA LIMPOPO NATURE RESERVE

DETAILS OF SPECIES INVOLVED

SPECIES		SEX	QUANTITY	MARKING
COMMON NAME	SCIENTIFIC NAME	(if known)		(if applicable)
ELEPHANT	LOXODONTA AFRICANA	MALE	ONE	

DETAILS OF RESTRICTED ACTIVITIES INVOLVED

TO HUNT ONE ELEPHANT BULL DURING THE DAY WITH A RIFLE. TUSKS MUST BE MARKED AT THE MILAM ENVIRONMENTAL OFFICE BEFORE THEY ARE EXPORTED TO A TAXIDERMIST

NAME AND SURNAME OF PURCHASER/SELLER	
RESIDENTIAL ADDRESS OF PURCHASER/SELLER	

IN CASE OF INTERNATIONAL IMPORT/EXPORT:

NAME AND SURNAME OF CONSIGNEE/CONSIGNOR	
RESIDENTIAL ADDRESS OF CONSIGNEE/CONSIGNOR	

IN THE CASE OF A HUNT:

NAME AND SURNAME OF HUNTING CLIENT (if applicable)	MR. ROBERT DEAN MILAM
NAME AND SURNAME OF PROFESSIONAL HUNTER (if applicable)	MR. RUDE MARAIS
NAME AND SURNAME OF HUNTING OUTFITTER (if applicable)	MR. JOHN ABRAHAM
WEAPON AND METHOD OF HUNTING	RIFLE, IVORY & STALK

IN THE CASE OF POSSESSION OF ELEPHANT IVORY OR RHINOCEROS HORN:

WEIGHT OF EACH PIECE APPLIED FOR	
LENGTH OF THE ELEPHANT IVORY	
BASE CIRCUMFERENCE OF ELEPHANT IVORY OR RHINOCEROS HORN	
REGISTRATION NUMBER	
MICROCHIP NUMBER	

PERMIT VALIDATION

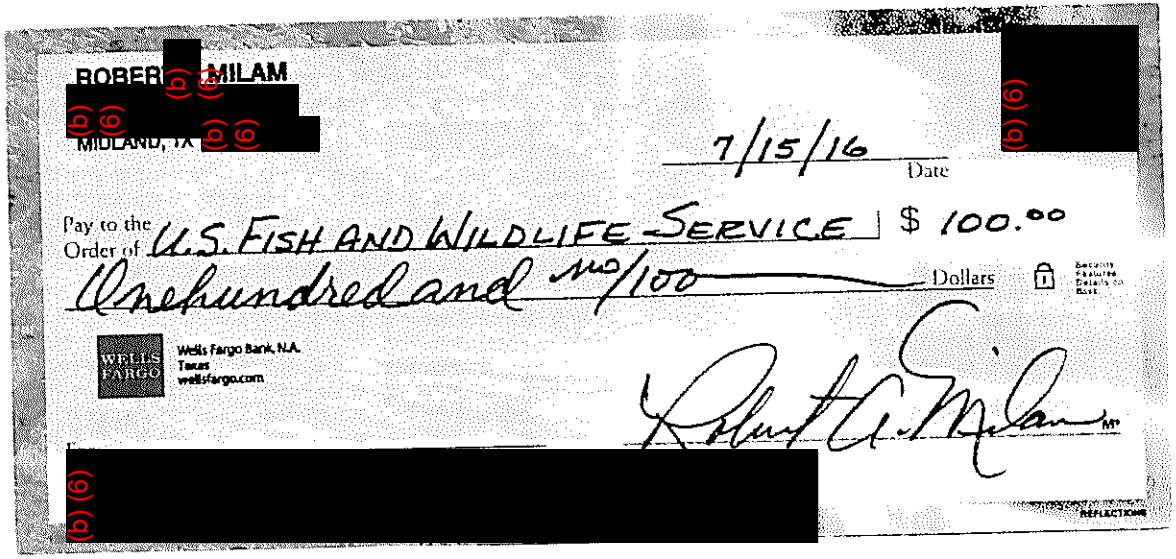
PERIOD OF VALIDITY	FROM: 24/07/2016	TO:	15/08/2016
RECEIPT NUMBER	1078591		

SIGNATURE OF ISSUING OFFICER:

SIGNATURE OF PERMIT HOLDER:

DATE STAMP:

RCVD JUL 18 2016



ROBERT [redacted] MILAM
[redacted]
MIDLAND, TX [redacted]

7/15/16
Date

Pay to the Order of U.S. FISH AND WILDLIFE SERVICE $ 100.00

One hundred and no/100 Dollars

WELLS FARGO
Wells Fargo Bank, N.A.
Texas
wellsfargo.com

[redacted]

FORM 3-201A (1/97)

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

IMPORT PERMIT

Page 1 of 1

1. Original Permit/Certificate No.
16US02051C/9

2. Valid
08/03/2017

3. Permittee (name and address, country)
ROBERT (b) (6) MILAM
(b) (6)
MIDLAND, TX (b) (6)
U.S.A.

4. Consignor (name and address, country)
SAFARI TAXIDERMY
47 GOUD STREET
LABORIA
POLOKWANE 0704
SOUTH AFRICA

5. Special Conditions

MUST COMPLY WITH ATTACHED GENERAL PERMIT CONDITIONS.

SPECIMEN MAY NOT BE SOLD OR TRANSFERRED FOR ANY FINANCIAL REMUNERATION.

MUST IMPORT THROUGH A DESIGNATED PORT LISTED IN CONDITION 10.

U.S. THREATENED SPECIES: TUSKS MUST BE MARKED AS PER [50 CFR 17.40(e)]. IN ACCORDANCE WITH THE AFRICAN ELEPHANT CONSERVATION ACT, RAW IVORY, INCLUDING SPORT-HUNTED TROPHIES THAT ARE WHOLLY OR PARTIALLY IVORY, MAY NOT BE RE-EXPORTED FROM THE U.S.

TROPHY MUST HAVE BEEN TAKEN DURING 2016 HUNTING SEASON.

5a. Purpose of Transaction
H

6. U.S. Management Authority
U.S. FISH AND WILDLIFE SERVICE
DIVISION OF MANAGEMENT AUTHORITY
BRANCH OF PERMITS, MS: IA
5275 LEESBURG PIKE
FALLS CHURCH VA 22041-3803

U.S. CITES Management Authority

-May not be used for commercial purposes. For live animals, only valid if the transport conditions comply with the CITES Guidelines for Transport of Live Animals or, in the case of air transport, with IATA Live Animals Regulations.

08/04/2016
Issuing Date

United States Management Authority

AUTHORITY: Endangered Species Act of 1973 (16 USC 1531 et. seq.)

7/8. Common Name and Scientific name (genus and species) of Animal or Plant	9. Description of Part or Derivative, including identifying marks or numbers (age/sex if live)	10. Appendix No. and Source
A. Common Name: AFRICAN ELEPHANT Scientific Name: LOXODONTA AFRICANA	9. IMPORT PERSONAL SPORT HUNTED TROPHY (shipment may contain bones, hair, hide, tusks, teeth, or any taxidermied part, as well as worked, manufactured, or handicraft items such as curios, jewelry, or other utilitarian items.)	10. 1 W 11. Quantity (including units): 1 NO 12. Country of Origin: SOUTH AFRICA
B. Common Name: [redacted] Scientific Name: [redacted]	9. [redacted]	10. [redacted] 11. Quantity (including units): [redacted] 12. Country of Origin: [redacted]
C. Common Name: [redacted] Scientific Name: [redacted]	9. [redacted]	10. [redacted] 11. Quantity (including units): [redacted] 12. Country of Origin: [redacted]
D. Common Name: [redacted] Scientific Name: [redacted]	9. [redacted]	10. [redacted] 11. Quantity (including units): [redacted] 12. Country of Origin: [redacted]
E. Common Name: [redacted] Scientific Name: [redacted]	9. [redacted]	10. [redacted] 11. Quantity (including units): [redacted] 12. Country of Origin: [redacted]

532517

2/10/17

US Fish and Wildlife Serice

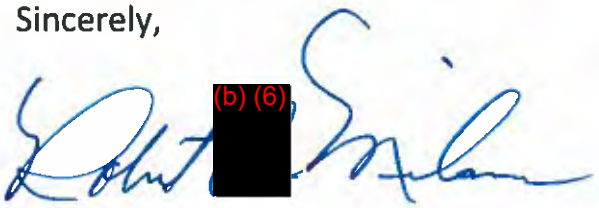
Attn: Jorge Zillaviciencio

RCVD FEB 13 2017 LB

I spoke with Kara in your offices today regarding an error made on my Import Permit No. 16US02051C/9 and she advised me to send in this form 3-200-52 Amendment with no additional payment due to the error was made by Fish and Wildlife in assigning the Appendix no. for my sport hunted trophy African Elephant. The exception for South Africa should have listed it as 2 W, instead of the assigned 1 W on my import permit. I am also enclosing the original import permit for replacement.

Please let me know if you need any further information.

Sincerely,



Robert (b) (6) Milam

(b) (6)

Department of the Interior
U.S. Fish and Wildlife Service

OMB No. 1018-0093
Expires 05/31/2017

Federal Fish and Wildlife Permit Application Form

RCVD FEB 13 2017

LB

Return to: U.S. Fish and Wildlife Service
(Enter address from pages 5 and 6 of application)

Type of Activity:
REISSUANCE, RENEWAL, OR AMENDMENT OF A PERMIT
(For this application, all permits, registrations, and certificates are referred to as a permit.)

Complete Sections A or B, C, D, and E of this application. U.S. address may be required in Section C, see instructions for details.
See attached instruction pages for information on how to make your application complete and help avoid unnecessary delays.

A. Complete if applying as an individual

1.a. Last name	1.b. First name	1.c. Middle name or initial	1.d. Suffix
Milam	Robert	(b) (6)	

2. Date of birth (mm/dd/yyyy)	3. Social Security No	4. Occupation	5. Affiliation/ Doing business as (see instructions)
(b) (6)			

6.a. Telephone number	6.b. Alternate telephone number	6.c. Fax number	6.d. E-mail address
(b) (6)			(b) (6)

B. Complete if applying on behalf of a business, corporation, public agency, Tribe, or institution

1.a. Name of business, agency, Tribe, or institution	1.b. Doing business as (dba)

2. Tax identification no.	3. Description of business, agency, Tribe, or institution

4.a. Principal officer Last name	4.b. Principal officer First name	4.c. Principal officer Middle name/ initial	4.d. Suffix

5. Principal officer title	6. Primary contact name

7.a. Business telephone number	7.b. Alternate telephone number	7.c. Business fax number	7.d. Business e-mail address

C. All applicants complete address information

1.a. Physical address (Street address, Apartment #, Suite #, or Room #, no P.O. Boxes)
(b) (6)

1.b. City	1.c. State	1.d. Zip code/Postal code	1.e. County/Province	1.f. Country
Midland	TX	(b) (6)		USA

2.a. Mailing Address (include if different than physical address; include name of contact person if applicable)

2.b. City	2.c. State	2.d. Zip code/Postal code	2.e. County/Province	2.f. Country

D. All applicants MUST complete

1. Attach check or money order payable to the U.S. FISH AND WILDLIFE SERVICE **in the amount indicated on pages 6 and 7**. Federal, Tribal, State, and local government agencies, and those acting on behalf of such agencies, are exempt from the processing fee – ***attach documentation of fee exempt status as outlined in instructions.*** (50 CFR 13.11(d))

2. Do you currently have or have you ever had any Federal Fish and Wildlife permits?
Yes ☑ If yes, list the number of the most current permit you have held or that you are applying to renew/re-issue: 16US02051C/9 No ☐

3. Certification: I hereby certify that I have read and am familiar with the regulations contained in ***Title 50, Part 13 of the Code of Federal Regulations*** and the other ***applicable parts in subch*** (b) (6) ***of Chapter I of Title 50***, and I certify that the information submitted in this application for a permit is complete and accurate to the best of my knowledge an[illegible] understand that any false statement herein may subject me to the criminal penalties of 18 U.S.C. 1001.

Robert [redacted] Milam — 02/10/2017

Signature (**in blue ink**) of applicant/person responsible for permit (No photocopied or stamped signatures) — Date of signature (mm/dd/yyyy)

E. REISSUANCE, RENEWAL, OR AMENDMENT OF A PERMIT (For this application, all permits, registrations, and certificates are referred to as a permit.)

NOTE 1: If you are renewing your Designated Port Exemption permit, use form 3-200-2 (http://www.fws.gov/forms/3-200-2.pdf) and submit to appropriate Office of Law Enforcement address. If you are renewing your Import/Export license (required for commercial activities), use form 3-200-3 (http://www.fws.gov/forms/3-200-3.pdf) and submit to appropriate Office of Law Enforcement address.

NOTE 2: This form **cannot** be used for lost or damaged permit. If you need to replace a lost or damaged permit, please use form 3-200-66, http://www.fws.gov/international/pdf/permit-application-form-3-200-66-replacement-document.pdf. The application **must** be submitted to the office that issued the initial permit. Lost or damaged permit

NOTE 3: Some activities, such as all master files for multiple shipments, Certificate of Scientific Exchange (COSE), circus/traveling exhibits, and artificially propagated plants, can only be re-issued, renewed, or amended by submitting a new application for permits for those activities. Please refer to http://www.fws.gov/international/permits/by-form-number/index.html to determine if another application form would be more appropriate or contact the Division of Management Authority for more information.

1. **Permit number.** Enter the permit number to be reissued/renewed/amend 16US02051C/9 .

2. Submit the original permit with this application.

3. **Past activities.**
   a. Provide copies of all cleared documents and form 3-177 (FWS declaration of wildlife) associated with this permit.
   b. Provide a summary detailing activities conducted under this permit, as well as a brief statement of why you are seeking reissuance/renewal.

4. **Annual Report.** If required by your permit, provide an annual report as conditioned (Please disregard if you have already submitted your annual report.)

5. **Sport-hunted trophies:** If you did not hunt during the hunting season stated in your original application, you are not eligible for a renewal. Please submit a new application form.

6. **Certification** - Complete one of the statements below and supply any additional documentation requested: (original signature is required)

   a. For **NO CHANGES** to original application:

   I certify that the information submitted in support of my original application for the permit indicated above has not changed and is still currently correct. I hereby request reissuance or renewal of this permit.

   Permittee's signature: _____ Date: _____

   b. For **CHANGES** to original application:

   On an attached page(s), provide a complete description of any changes (e.g., change in principal officer, personnel, address, location of activities, types of activities). Please sign each attached page. Also note that we need to request additional information regarding the changes after reviewing your initial request.

   I certify that the information submitted in support of my original application for the permit indicated above is still currently correct EXCEPT for the changes noted on the attached, signed page(s). I hereby request re-issuance or ren[redacted] this permit with the indicated changes.

   Permittee's signature: Robert [redacted] Williams Date: 02/10/2017

7. All international shipment(s) must be through a designated port, unless otherwise authorized. A list of designated ports (where an inspector is posted) is available from http://www.fws.gov/le/designated-ports.html. If you wish to use a port not listed, please contact either the Office of Law Enforcement for a Designated Port Exemption Permit (form 3-200-2) or the Division of Management Authority.

8. Name and address where you wish the permit to be mailed, **if** different from page 1 (All permits will be mailed via the U.S. Postal Service, unless you identify an alternative means below):

9. If you wish the permit to be delivered by means other than USPS regular mail, provide an air bill, pre-paid envelope, or billing information. If you do not have a pre-paid envelope or air bill and wish to pay for a courier service with your credit card, please check the box below. Please DO NOT include credit card number or other information; you will be contacted for this information.

   ☒ If a permit is issued, please send it via a courier service to the address on page 1 or question 8. I understand that you will contact me for my credit card information once the application has been processed.

11. Who should we contact if we have questions about the application? (Include name, phone number, and email):

Robert Milam(b) (6) [redacted]

12. **Disqualification Factor.** A conviction, or entry of a plea of guilty or nolo contendere, for a felony violation of the Lacey Act, the Migratory Bird Treaty Act, or the Bald and Golden Eagle Protection Act disqualifies any such person from receiving or exercising the privileges of a permit, unless such disqualification has been expressly waived by the Service Director in response to a written petition. [50 CFR 13.21(c)]. Have you or any of the owners of the business, if applying as a business, been convicted, or entered a plea of guilty or nolo contendere, forfeited collateral, or are currently under charges for any violations of the laws mentioned above?

☐ Yes ☑ No If you answered "Yes" provide: a) the individual's name, b) date of charge, c) charge(s), d) location of incident, e) court, and f) action taken for each violation.

FORM 3-201A (1/97)

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

IMPORT PERMIT

Page 1 of 1

1. Original Permit/Certificate No.
16US02051C/9

2. Valid
08/03/2017

3. Permittee (name and address, country)
ROBERT (b) (6) MILAM
(b) (6)
MIDLAND, T(b) (6)
U.S.A.

4. Consignor (name and address, country)
SAFARI TAXIDERMY
47 GOUD STREET
LABORIA
POLOKWANE 0704
SOUTH AFRICA

Original, Unused Permit Returned

5. Special Conditions

MUST COMPLY WITH ATTACHED GENERAL PERMIT CONDITIONS.

SPECIMEN MAY NOT BE SOLD OR TRANSFERRED FOR ANY FINANCIAL REMUNERATION.

MUST IMPORT THROUGH A DESIGNATED PORT LISTED IN CONDITION 10.

U.S. THREATENED SPECIES: TUSKS MUST BE MARKED AS PER [50 CFR 17.40(e)]. IN ACCORDANCE WITH THE AFRICAN ELEPHANT CONSERVATION ACT, RAW IVORY, INCLUDING SPORT-HUNTED TROPHIES THAT ARE WHOLLY OR PARTIALLY IVORY, MAY NOT BE RE-EXPORTED FROM THE U.S.

TROPHY MUST HAVE BEEN TAKEN DURING 2016 HUNTING SEASON.

5a. Purpose of Transaction
H

6. U.S. Management Authority
U.S. FISH AND WILDLIFE SERVICE
DIVISION OF MANAGEMENT AUTHORITY
BRANCH OF PERMITS, MS: IA
5275 LEESBURG PIKE
FALLS CHURCH VA 22041-3803

U.S. CITES Management Authority

-May not be used for commercial purposes. For live animals, only valid if the transport conditions comply with the CITES Guidelines for Transport of Live Animals or, in the case of air transport, with IATA Live Animals Regulations.

08/04/2016
Issuing Date

United States Management Authority

AUTHORITY: Endangered Species Act of 1973 (16 USC 1531 et. seq.)

7/8. Common Name and Scientific name (genus and species) of Animal or Plant	9. Description of Part or Derivative, including identifying marks or numbers (age/sex if live)	10. Appendix No. and Source
A. Common Name: AFRICAN ELEPHANT Scientific Name: LOXODONTA AFRICANA	9. IMPORT PERSONAL SPORT HUNTED TROPHY (shipment may contain bones, hair, hide, tusks, teeth, or any taxidermied part, as well as worked, manufactured, or handicraft items such as curios, jewelry, or other utilitarian items.)	10. 1 W 11. Quantity (including units) 1 NO 12. Country of Origin SOUTH AFRICA
B. Common Name: Scientific Name:	9.	10. 11. Quantity (including units) 12. Country of Origin
C. Common Name: Scientific Name:	9.	10. 11. Quantity (including units) 12. Country of Origin
D. Common Name: Scientific Name:	9.	10. 11. Quantity (including units) 12. Country of Origin
E. Common Name: Scientific Name:	9.	10. 11. Quantity (including units) 12. Country of Origin

532517

ELEPHANT IMPORT FROM SOUTH AFRICA

Permit Number: MA02051C-1
Effective: 03/13/2017 Expires: 08/03/2017

Issuing Office:

Department of the Interior
U.S. FISH AND WILDLIFE SERVICE
DIVISION OF MANAGEMENT AUTHORITY
BRANCH OF PERMITS, MS: IA
5275 LEESBURG PIKE
FALLS CHURCH VA 22041-3803

CHIEF, BRANCH OF PERMITS, DMA

Permittee:
ROBERT (b) (6) **MILAM**
(b) (6)
MIDLAND, TX (b) (6)
U.S.A.

Authority: Statutes and Regulations: 16 USC 1539 (a); 50 CFR 17.40 (e).

Location where authorized activity may be conducted:
IMPORT THROUGH ANY PORT LISTED IN 50 CFR 14.12

Reporting requirements: Not applicable

Conditions and Authorizations:

A. Authorized to import the sport-hunted trophy of one African elephant (*Loxodonta africana*), taken in South Africa for the purpose of enhancement of the survival of the species.

B. Specimen may not be sold or transferred for any financial remuneration.

C. U.S. Threatened Species: tusks must be marked as per [50 CFR 17.40(e)]. In accordance with the African Elephant Conservation Act, raw ivory, including sport-hunted trophies that are wholly or partially ivory, may not be re-exported from the U.S.

D. **Trophy must have been taken during the 2016 hunting season.**

E. Trophy must be accompanied by a valid Convention on International Trade in Endangered Species (CITES) Appendix II export permit issued by the Management Authority of South Africa.

F. General conditions set out in Subpart D of 50 CFR 13, and specific conditions contained in Federal regulations cited above, are hereby made a part of this permit. All activities authorized herein must be carried out in accord with and for the purposes described in the application submitted. Continued validity, or renewal of this permit is subject to complete and timely compliance with all applicable conditions, including the filing of all required information and reports.

G. The validity of this permit is also conditioned upon strict observance of all applicable foreign, state, local, tribal, or other federal law. **This permit can be photocopied.**

H. Valid for use by permittee named above.

I. Acceptance of this permit serves as evidence that the permittee understands and agrees to abide by the "General Permit Conditions" (copy attached).

Department of the Interior
U.S. Fish and Wildlife Service

OCT 18 2017

OMB No. 1018-0164
Expires 11/30/2016

Federal Fish and Wildlife Permit Application Form

Return to: U.S. Fish and Wildlife Service
Division of Management Authority (DMA)
Branch of Permits, MS: IA
5275 Leesburg Pike
Falls Church, VA 22041-3803
1-800-358-2104 or 703-358-2104

Type of Activity:
Import of Sport-hunted Trophies of Southern African Leopard, African Elephant, and Namibian Southern White Rhinoceros

Complete Sections A or B, and C, D, and E of this application. U.S. address may be required in Section C, see instructions for details.
See attached instruction pages for information on how to make your application complete and help avoid unnecessary delays.

A. Complete if applying as an individual

1.a. Last name	1.b. First name	1.c. Middle name or initial	1.d. Suffix
Newman	John	(b) (6)	Mr.

2. Date of birth (mm/dd/yyyy)	3. Occupation	4. Affiliation/ Doing business as (see instructions)
(b) (6)		

5.a. Telephone number	5.b. Alternate telephone number	5.c. Fax number	5.d. E-mail address
(b) (6)			(b) (6)

B. Complete if applying on behalf of a business, corporation, public agency, Tribe, or institution

1.a. Name of business, agency, Tribe, or institution	1.b. Doing business as (dba)

2. Tax identification no.	3. Description of business, agency, Tribe, or institution

4.a. Principal officer Last name	4.b. Principal officer First name	4.c Principal officer Middle name/ initial	4 d. Suffix

5. Principal officer title	6. Primary contact name

7.a. Business telephone number	7.b. Alternate telephone number	7.c. Business fax number	7.d. Business e-mail address

C. All applicants complete address information

1.a. Physical address (Street address; Apartment #, Suite #, or Room #; no P.O. Boxes)
(b) (6)

1.b. City	1.c. State	1.d. Zip code/Postal code:	1.e. County/Province	1.f. Country
Gladewater	TX	(b) (6)		USA

2.a. Mailing Address (include if different than physical address; include name of contact person if applicable)
(b) (6)

2.b. City	2.c. State	2.d. Zip code/Postal code:	2.e. County/Province	2.f. Country
(b) (6)				USA

D. All applicants MUST complete

1. Attach check or money order payable to the U.S. FISH AND WILDLIFE SERVICE **in the amount of $100, nonrefundable processing fee**. Federal, Tribal, State, and local government agencies, and those acting on behalf of such agencies, are exempt from the processing fee – ***attach documentation of fee exempt status as outlined in instructions.*** (50 CFR 13.11(d))

2. Do you currently have or have you ever had any Federal Fish and Wildlife permits?
Yes [X] If yes, list the number of the most current permit you have held or that you are applying to renew/re-issue: MA03036C-0 No [ ]

3. Certification: I hereby certify that I have read and am familiar with the regulations contained in ***Title 50, Part 13 of the Code of Federal Regulations*** and the other ***applicable parts in subchapter B of Chapter I of Title 50***, and I certify that the information submitted in this application for a permit is complete and accurate to the best of my knowledge and belief. I understand that any false statement herein may subject me to the criminal penalties of 18 U.S.C. 1001.

X _____ 10/08/2017
Signature of applicant/person responsible for permit (No photocopied or stamped signatures) — Date of signature (mm/dd/yyyy)

Please continue to next page

E. IMPORT OF SPORT-HUNTED TROPHIES OF SOUTHERN AFRICAN LEOPARD, AFRICAN ELEPHANT, AND NAMIBIAN SOUTHERN WHITE RHINOCEROS

Note 1: If you hold an import permit for a trophy/trophies that you did not use, please **return the unused original permit**. If you are requesting reissuance of a permit because you have taken a trophy, but were unable to import it prior to the expiration of the permit, please use the renewal form (3-200-52; http://www.fws.gov/international/permits/by-form-number/index.html) and return your original permit with that form.

Note 2: *Sport-hunted trophy* is defined at 50 CFR 23.74 as follows: *Sport-hunted trophy* means a whole dead animal or a readily recognizable part or derivative of an animal specifically identified on the accompanying CITES document that meets the following criteria:

(1) Is raw, processed, or manufactured;
(2) Was legally obtained by the hunter through hunting for his or her personal use;
(3) Is being imported, exported, or re-exported by or on behalf of the hunter as part of the transfer from its country of origin ultimately to the hunter's country of usual residence; and
(4) Includes worked, manufactured, or handicraft items made from the sport-hunted animal only when:
  (i) Such items are contained in the same shipment as raw or tanned parts of the sport-hunted animal and are for the personal use of the hunter;
  (ii) The quantity of such items is no more than could reasonably be expected given the number of animals taken by the hunter as shown on the license or other documentation of the authorized hunt accompanying the shipment; and
  (iii) The accompanying CITES documents (export document and, if appropriate, import permit) contain a complete itemization and description of all items included in the shipment.

Note 3: Certain hunting trophies, including leopard, elephant, and rhinoceros hunting trophies, are subject to restrictions on their use after import into the United States. Please see 50 CFR 23.55 for more information or contact the Division of Management Authority.

Please provide the following information. Complete all questions on the application. Mark questions that are not applicable with "N/A". If applying for more than one trophy, be sure to answer questions 2 and 3 for each trophy.

If importing trophies from more than one country, you must submit a separate application for each shipment in order to obtain separate import permits.

1. ENTER the quantity next to the name of the species you are applying to import (you may apply to import specimens of more than one species provided they have been/are being hunted in the same country):

Leopard (*Panthera pardus*) Quantity: 0 (Import is limited to two per hunter per calendar year)

African elephant (*Loxodonta africana*) Quantity: 1 (Import is limited to two per hunter per calendar year)
Note: once imported, ivory cannot be re-exported.

Southern white rhinoceros (*Ceratotherium simum simum*) from Namibia Quantity:_____ (An import permit is not required for trophies harvested in South Africa or Swaziland. If you wish to import from a different country, please use form 3-200-37).

2. **IF ANIMAL IS CURRENTLY LIVING IN THE WILD,** please enter the following:
   a. Country and place (area, region, GIS coordinates, ranch AND nearest city) where wildlife is to be taken from the wild:

NA

   b. Date wildlife is to be hunted:

NA

c. Description of the trophy and parts you intend to import (e.g., skin, skull, shoulder mount, life size mount, claws, horns, tusks).

NA

3. **IF THE ANIMAL IS DEAD**, please enter the following:
   a. Country and place (area, region, GIS coordinates, ranch, and/or AND nearest city) where trophy was removed from the wild: South Africa, Umbabat Private Nature Reserve
   b. Date wildlife was hunted: 12/22/2014 Hoedsplut
   c. Description of the trophy and parts you intend to import (e.g., skin, skull, shoulder mount, life size mount, claws, horn, tusks): Processed Leather from animal, Ivory Tusks, Feet
   d. The current location of the trophy (address and country) [the U.S. import permit will identify this country as the country of export/re-export and must match with the export/re-export document]: Trophex CC Po Box 5432 Onverwacht Limpopo Province 0557 South Africa

4. Complete name and address of overseas person or business shipping the trophy to you. If you are applying to import a trophy directly from Namibia, you **must** provide the name and address of the professional hunter listed on your Namibian hunting permit [this name will appear on the face of the export permit].

Name: Business Name: Address:	Trophex CC
Address:	PO Box 5432
City:	ONVERWACHT
State/Province:	LIMPOPO
Country, Postal Code:	PROVINCE 0557
	SOUTH Africa

5. Please be aware that the U.S. Fish and Wildlife Service may need to make a finding that your activities will enhance or benefit wild populations of the species involved. If you have any information that could support this finding (e.g., how the funds from license/trophy fees will be spent, what portion of the hunting fee will support conservation), please submit such information on a separate page with your application.

CERTIFICATION STATEMENT (original signature must be provided for either 6 or 7 below)

6. **If you are a broker or taxidermist applying on behalf of a foreign national,** provide documentation to show you have a **Power of Attorney** to act on your client's behalf and sign the following statement.

   I acknowledge that the sport-hunted trophy/trophies to be imported has been/will be personally hunted by my client and is being imported only for my client's personal use (i.e., **not for sale, transfer, donation, or exchange that is reasonably likely to result in economic use, gain, or benefit**). I understand that my client may only import two leopard trophies in one calendar year. I understand that my client may only import two African elephant trophies in one calendar year. In addition, I have advised my client that raw ivory, once imported into the United States, cannot be re-exported.

   Taxidermist/Broker's signature: NA Date: NA

7. **If you are the hunter applying to import your own trophy**, please read and sign the following statement.

I acknowledge that the sport-hunted trophy/trophies to be imported has been/will be personally hunted by me and is being imported only for my personal use (i.e., **not for sale, transfer, donation, or exchange that is reasonably likely to result in economic use, gain, or benefit**). I understand that I may only import two leopard trophies in one calendar year. I understand that I may only import two African elephant trophies in one calendar year. In addition, I understand that raw ivory, once imported into the United States, cannot be re-exported.

Applicant's signature: _____ Date: 10/08/2017

Be aware that there may be additional permitting or approval requirements by your local or state governments, as well as required by other Federal agencies or foreign government to conduct your propose activity. While the Service will attempt to assist where possible, it is your responsibility to obtain such approval.

8. All international shipment(s) must be through a designated port. A list of designated ports (where an inspector is posted) is available from http://www.fws.gov/le/designated-ports.html. If you wish to use a port not listed, please contact the Office of Law Enforcement for a Designated Port Exemption Permit (form 3-200-2).

Dallas/ Fort Worth
PO Box 610069
DFW AIRPORT, Tx 75261

Dallas / Fort Worth
1639 west 23, Suite 105

9. Name and address where you wish the permit to be mailed, if different from page 1 (All permits will be mailed via the U.S. Postal Service, unless you identify an alternative means below):

Nt

10. If you wish the permit to be delivered by means other than USPS regular mail, provide an air bill, pre-paid envelope, or billing information. If you do not have a pre-paid envelope or air bill and wish to pay for a courier service with your credit card, please check the box below. Please DO NOT include credit card number or other information; you will be contacted for this information.

☐ If a permit is issued, please send it via a courier service to the address on page 1 or question 9. I understand that you will contact me for my credit card information once the application has been processed.

11. Who should we contact if we have questions about the application? (Include name, phone number, and email):

James (b)(6) Bethune (b)(6) [redacted]

12. **Disqualification Factor**. A conviction, or entry of a plea of guilty or nolo contendere, for a felony violation of the Lacey Act, the Migratory Bird Treaty Act, or the Bald and Golden Eagle Protection Act disqualifies any such person from receiving or exercising the privileges of a permit, unless such disqualification has been expressly waived by the Service Director in response to a written petition. (50 CFR 13.21(c)) Have you or any of the owners of the business, if applying as a business, been convicted, or entered a plea of guilty or nolo contendere, forfeited collateral, or are currently under charges for any violations of the laws mentioned above?

☐ Yes ☒ No If you answered "Yes" provide: a) the individual's name, b) date of charge, c) charge(s), d) location of incident, e) court, and f) action taken for each violation.

OCT 1 8 2017

UNITED STATES POSTAL SERVICE

POSTAL MONEY ORDER

Serial Number
(b) (6)

Year Month Day
2017-10-18

(b) (6)

U.S. Dollars and Cents
$100.00

Amount
One Hundred Dollars and 00/100 ********

Pay to U.S. Fish and Wildlife Service

Clerk 07

Address 5225 Leesburg Pike
Falls Church, VA 22041

From John (b) (6) Newman

Address (b) (6)

Memo MA030360-0

Kilgore, TX (b) (6)

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SEE REVERSE WARNING • NEGOTIABLE ONLY IN THE U.S. AND POSSESSIONS

(b) (6)

ELEPHANT IMPORT FROM SOUTH AFRICA

Permit Number: MA03036C-1

Effective: 11/16/2017 Expires: 11/15/2018

Issuing Office:

Department of the Interior
U.S. FISH AND WILDLIFE SERVICE
DIVISION OF MANAGEMENT AUTHORITY
BRANCH OF PERMITS, MS: IA
5275 LEESBURG PIKE
FALLS CHURCH VA 22041-3803

CHIEF, BRANCH OF PERMITS, DMA

Permittee:
JOHN (b) (6) NEWMAN
(b) (6)
GLADEWATER, TX (b) (6)
U.S.A.

Authority: Statutes and Regulations: 16 USC 1539 (a); 50 CFR 17.40 (e).

Location where authorized activity may be conducted:
IMPORT THROUGH ANY PORT LISTED IN 50 CFR 14.12

Reporting requirements: Not applicable

Authorizations and Conditions:

A. Authorized to import the sport-hunted trophy of one African elephant (*Loxodonta africana*), taken in South Africa for the purpose of enhancement of the survival of the species.

B. Specimen may not be sold or transferred for any financial remuneration.

C. U.S. Threatened Species: tusks must be marked as per [50 CFR 17.40(e)]. In accordance with the African Elephant Conservation Act, raw ivory, including sport-hunted trophies that are wholly or partially ivory, may not be re-exported from the U.S.

D. **Trophy must have been taken during the 2014 hunting season.**

E. Trophy must be accompanied by a valid Convention on International Trade in Endangered Species (CITES) Appendix II export permit issued by the Management Authority of South Africa.

F. General conditions set out in Subpart D of 50 CFR 13, and specific conditions contained in Federal regulations cited above, are hereby made a part of this permit. All activities authorized herein must be carried out in accord with and for the purposes described in the application submitted. Continued validity, or renewal of this permit is subject to complete and timely compliance with all applicable conditions, including the filing of all required information and reports.

G. The validity of this permit is also conditioned upon strict observance of all applicable foreign, state, local, tribal, or other federal law. **This permit can be photocopied.**

H. Valid for use by permittee named above.

I. Acceptance of this permit serves as evidence that the permittee understands and agrees to abide by the "General Permit Conditions" (copy attached).

Department of the Interior
U.S. Fish and Wildlife Service

OMB No 1018-0164
Expires 11/30/2016

Federal Fish and Wildlife Permit Application Form

RCVD AUG 10 2016

Return to: U.S. Fish and Wildlife Service
Division of Management Authority (DMA)
Branch of Permits, MS: IA
5275 Leesburg Pike
Falls Church, VA 22041-3803
1-800-358-2104 or 703-358-2104

Type of Activity:
Import of Sport-hunted Trophies of Southern African Leopard, African Elephant, and Namibian Southern White Rhinoceros

Complete Sections A or B, and C, D, and E of this application. U.S. address may be required in Section C, see instructions for details.
See attached instruction pages for information on how to make your application complete and help avoid unnecessary delays.

A. Complete if applying as an individual

1.a. Last name	1.b. First name	1.c. Middle name or initial	1.d. Suffix
Jines	Michael	(b) (6)	

2. Date of birth (mm/dd/yyyy)	3. Occupation	4. Affiliation/ Doing business as (see instructions)	
(b) (6)			

5.a. Telephone number	5.b. Alternate telephone number	5.c. Fax number	5.d. E-mail address
(b) (6)			(b) (6)

B. Complete if applying on behalf of a business, corporation, public agency, Tribe, or institution

1.a. Name of business, agency, Tribe, or institution	1.b. Doing business as (dba)	

2. Tax identification no.	3. Description of business, agency, Tribe, or institution		

4.a. Principal officer Last name	4.b. Principal officer First name	4.c. Principal officer Middle name/ initial	4.d. Suffix

5. Principal officer title	6. Primary contact name		

7.a. Business telephone number	7.b. Alternate telephone number	7.c. Business fax number	7.d. Business e-mail address

C. All applicants complete address information

1.a. Physical address (Street address, Apartment #, Suite #, or Room #; no P.O. Boxes)
(b) (6)

1.b. City	1.c. State	1.d. Zip code/Postal code	1.e. County/Province	1.f. Country
Kingwood	Texas	(b) (6)		USA

2.a. Mailing Address (include if different than physical address; include name of contact person if applicable)

2.b. City	2.c. State	2.d. Zip code/Postal code	2.e. County/Province	2.f. Country

D. All applicants MUST complete

1. Attach check or money order payable to the U.S. FISH AND WILDLIFE SERVICE **in the amount of $100, nonrefundable processing fee**. Federal, Tribal, State, and local government agencies, and those acting on behalf of such agencies, are exempt from the processing fee – ***attach documentation of fee exempt status as outlined in instructions.*** (50 CFR 13.11(d))

2. Do you currently have or have you ever had any Federal Fish and Wildlife permits?
Yes ☑ If yes, list the number of the most current permit you have held or that you are applying to renew/re-issue: 07US165703/9 No ☐

3. Certification. I hereby certify that I have read and am familiar with the regulations contained in ***Title 50, Part 13 of the Code of Federal Regulations*** and the other ***applicable parts in subchapter B of Chapter I of Title 50***, and I certify that the information submitted in this application for a permit is complete and accurate to the best of my knowledge and belief. I understand that any false statement herein may subject me to the criminal penalties of 18 U.S.C. 1001.

Signature of applicant/person responsible for permit (No photocopied or stamped signatures) — Date of signature (mm/dd/yyyy): 08/04/2016

Please continue to next page

E. IMPORT OF SPORT-HUNTED TROPHIES OF SOUTHERN AFRICAN LEOPARD, AFRICAN ELEPHANT, AND NAMIBIAN SOUTHERN WHITE RHINOCEROS

Note 1: If you hold an import permit for a trophy/trophies that you did not use, please **return the unused original permit.** If you are requesting reissuance of a permit because you have taken a trophy, but were unable to import it prior to the expiration of the permit, please use the renewal form (3-200-52; http://www.fws.gov/international/permits/by-form-number/index.html) and return your original permit with that form.

Note 2: *Sport-hunted trophy* is defined at 50 CFR 23.74 as follows: *Sport-hunted trophy* means a whole dead animal or a readily recognizable part or derivative of an animal specifically identified on the accompanying CITES document that meets the following criteria:

(1) Is raw, processed, or manufactured;
(2) Was legally obtained by the hunter through hunting for his or her personal use;
(3) Is being imported, exported, or re-exported by or on behalf of the hunter as part of the transfer from its country of origin ultimately to the hunter's country of usual residence; and
(4) Includes worked, manufactured, or handicraft items made from the sport-hunted animal only when:
(i) Such items are contained in the same shipment as raw or tanned parts of the sport-hunted animal and are for the personal use of the hunter;
(ii) The quantity of such items is no more than could reasonably be expected given the number of animals taken by the hunter as shown on the license or other documentation of the authorized hunt accompanying the shipment; and
(iii) The accompanying CITES documents (export document and, if appropriate, import permit) contain a complete itemization and description of all items included in the shipment.

Note 3: Certain hunting trophies, including leopard, elephant, and rhinoceros hunting trophies, are subject to restrictions on their use after import into the United States. Please see 50 CFR 23.55 for more information or contact the Division of Management Authority.

Please provide the following information. Complete all questions on the application. Mark questions that are not applicable with "N/A". If applying for more than one trophy, be sure to answer questions 2 and 3 for each trophy.

If importing trophies from more than one country, you must submit a separate application for each shipment in order to obtain separate import permits.

1. ENTER the quantity next to the name of the species you are applying to import (you may apply to import specimens of more than one species provided they have been/are being hunted in the same country):

Leopard (*Panthera pardus*) Quantity: N/A (Import is limited to two per hunter per calendar year)

African elephant (*Loxodonta africana*) Quantity: 1 (Import is limited to two per hunter per calendar year)
Note: once imported, ivory cannot be re-exported.

Southern white rhinoceros (*Ceratotherium simum simum*) from Namibia Quantity: N/A (An import permit is not required for trophies harvested in South Africa or Swaziland. If you wish to import from a different country, please use form 3-200-37).

2. **IF ANIMAL IS CURRENTLY LIVING IN THE WILD,** please enter the following:
   a. Country and place (area, region, GIS coordinates, ranch AND nearest city) where wildlife is to be taken from the wild:

   N/A

   b. Date wildlife is to be hunted:

   N/A

c. Description of the trophy and parts you intend to import (e.g., skin, skull, shoulder mount, life size mount, claws, horns, tusks).

N/A

3. **IF THE ANIMAL IS DEAD**, please enter the following:
   a. Country and place (area, region, GIS coordinates, ranch, and/or AND nearest city) where trophy was removed from the wild: Zimbabwe Grid Reference 086276, Mbire Guruve North Area 1, Ward 2 Nearest City: Mushumbi Pools, Guruve
   b. Date wildlife was hunted: February 25, 2015
   c. Description of the trophy and parts you intend to import (e.g., skin, skull, shoulder mount, life size mount, claws, horn, tusks):

      Tusks (Ivory)

   d. The current location of the trophy (address and country) [the U.S. import permit will identify this country as the country of export/re-export and must match with the export/re-export document]:

      CMS Safaris, 14 Yellow Wood Lane, Kambanji, Harare, Zimbabwe

4. Complete name and address of overseas person or business shipping the trophy to you. If you are applying to import a trophy directly from Namibia, you **must** provide the name and address of the professional hunter listed on your Namibian hunting permit [this name will appear on the face of the export permit].

Name: Business	CMS Safaris
Name: Address:	14 Yellow Wood Lane
Address:	Kambanji
City:	Harare
State/Province:	
Country, Postal Code:	Zimbabwe

5. Please be aware that the U.S. Fish and Wildlife Service may need to make a finding that your activities will enhance or benefit wild populations of the species involved. If you have any information that could support this finding (e.g., how the funds from license/trophy fees will be spent, what portion of the hunting fee will support conservation), please submit such information on a separate page with your application.

CERTIFICATION STATEMENT (original signature must be provided for either 6 or 7 below)

6. **If you are a broker or taxidermist applying on behalf of a foreign national,** provide documentation to show you have a **Power of Attorney** to act on your client's behalf and sign the following statement.

   I acknowledge that the sport-hunted trophy/trophies to be imported has been/will be personally hunted by my client and is being imported only for my client's personal use (i.e., **not for sale, transfer, donation, or exchange that is reasonably likely to result in economic use, gain, or benefit**). I understand that my client may only import two leopard trophies in one calendar year. I understand that my client may only import two African elephant trophies in one calendar year. In addition, I have advised my client that raw ivory, once imported into the United States, cannot be re-exported.

   Taxidermist/Broker's signature:_____ Date: _____

7. **If you are the hunter applying to import your own trophy,** please read and sign the following statement.

I acknowledge that the sport-hunted trophy/trophies to be imported has been/will be personally hunted by me and is being imported only for my personal use (i.e., **not for sale, transfer, donation, or exchange that is reasonably likely to result in economic use, gain, or benefit**). I understand that I may only import two leopard trophies in one calendar year. I understand that I may only import two African elephant trophies in one calendar year. In addition, I understand that raw ivory, once imported into the United States, cannot be re-exported.

Applicant's signature: _____ Date: 08/04/2016

Be aware that there may be additional permitting or approval requirements by your local or state governments, as well as required by other Federal agencies or foreign government to conduct your propose activity. While the Service will attempt to assist where possible, it is your responsibility to obtain such approval.

8. All international shipment(s) must be through a designated port. A list of designated ports (where an inspector is posted) is available from http://www.fws.gov/le/designated-ports.html. If you wish to use a port not listed, please contact the Office of Law Enforcement for a Designated Port Exemption Permit (form 3-200-2).

9. Name and address where you wish the permit to be mailed, **if** different from page 1 (All permits will be mailed via the U.S. Postal Service, unless you identify an alternative means below):

N/A

10. If you wish the permit to be delivered by means other than USPS regular mail, provide an air bill, pre-paid envelope, or billing information. If you do not have a pre-paid envelope or air bill and wish to pay for a courier service with your credit card, please check the box below. Please DO NOT include credit card number or other information; you will be contacted for this information.

☐ If a permit is issued, please send it via a courier service to the address on page 1 or question 9. I understand that you will contact me for my credit card information once the application has been processed.

11. Who should we contact if we have questions about the application? (Include name, phone number, and email):

Michael (b) (6) Jines, (b) (6) [redacted]

12. **Disqualification Factor**. A conviction, or entry of a plea of guilty or nolo contendere, for a felony violation of the Lacey Act, the Migratory Bird Treaty Act, or the Bald and Golden Eagle Protection Act disqualifies any such person from receiving or exercising the privileges of a permit, unless such disqualification has been expressly waived by the Service Director in response to a written petition. (50 CFR 13.21(c)) Have you or any of the owners of the business, if applying as a business, been convicted, or entered a plea of guilty or nolo contendere, forfeited collateral, or are currently under charges for any violations of the laws mentioned above?

☐ Yes ☑ No If you answered "Yes" provide: a) the individual's name, b) date of charge, c) charge(s), d) location of incident, e) court, and f) action taken for each violation.

N/A

E.5 Supplemental Information

Please see information provided by ZPWMA, CM Safaris, other safari operators and Conservation Force since the date of the suspension. The elephant population has been established to be more than 80,000 and the poaching incidents (alleged 300 poisoned) have been greatly exaggerated by agenda driven Johnny Rodrigues.

RCVD AUG 10 2016

CONSERVATION FORCE

A FORCE FOR WILDLIFE CONSERVATION

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April 6, 2017

Chief Tim Van Norman
Branch of Permits, Division of Management Authority
U.S. Fish and Wildlife Service, MS: IA
5275 Leesburg Pike
Falls Church, Virginia 22041

APR 13 2017

BY EMAIL AND FEDERAL EXPRESS

Re: Request for Reconsideration of Denial of Permit Applications PRT-04846C and PRT-04205C

Dear Chief Van Norman:

We request reconsideration of the denials of two applications for permits to import hunting trophies of elephant taken in Zimbabwe in 2015 ("Denials"). The first application was submitted by Richard Bonander, PRT-04846C, for a bull elephant taken in the Ngamo/Sikumi Forest Block in Zimbabwe on March 21, 2015. The second was submitted by Michael Jines, PRT-04205C, for a bull elephant taken in the Mbire CAMPFIRE District in Zimbabwe on February 25, 2015. Conservation Force represents both Applicants.

The Denials should be reconsidered and reversed for eight primary reasons. First, they rely upon the *Enhancement Finding for African Elephant Taken as Sport-Hunted Trophies in Zimbabwe on or after January 1, 2015*, dated March 26, 2015 ("Finding"). But the Finding fails to consider significant information submitted by Conservation Force, Zimbabwe's Parks and Wildlife Management Authority ("ZPWMA"), and others. If considered, the negative conclusion would have to be reversed. The information provided:

- Establishes that Zimbabwe has the most up-to-date management plan for African elephant in the world, with adaptive and regionally-specific action items, clear assignment of responsibilities, and means of verifying its implementation successes;
- Establishes that Zimbabwe has a relatively stable elephant population, as determined by a recent countrywide survey;
- Demonstrates that Zimbabwe has been effectively enforcing laws and policies to protect elephant and other species, and has implemented new measures and ramped-up national and local efforts to combat poaching;
- Demonstrates that hunting offtakes are sustainable and based on the consideration of all causes of elephant mortality, biological and critical social factors, and scientific recommendations;
- Reflects the full cooperation of ZPWMA in responding to the FWS' information demands, including production of sensitive budget information that underscores the essential role hunting, especially elephant hunting, plays in supporting wildlife conservation, management, and protection, both in the Parks estate and community areas;
- Evidences how the government's grant of Appropriate Authority to local landholders has created a public-private-community partnership that obligates all stakeholders to invest in protection and conservation of wildlife on their lands; and

- Proves that licensed, regulated hunting enhances the survival of elephant and other species in the country by securing habitat, generating management funding, underwriting and supporting anti-poaching, and incentivizing greater tolerance of elephant by rural community members.

In sum, because the information provided demonstrates that the enhancement standard is met, and this information was not relied upon in denying the applications, we respectfully request reconsideration and reversal of the Denials and issuance of the requested import permits.

Reason for Reconsideration 1: Failure to Consider Best-Available Information

In the Finding, the FWS repeatedly stated it would review its negative conclusion if additional information was provided.[1] But the FWS has not done so. It has not considered hundreds of pages of information in the Denials, which rely upon the Finding.

The Finding was made on March 26, 2015. Information has been provided to the FWS from April 17, 2014 through as recently as February 2017 by Conservation Force, ZPWMA, the IUCN African Elephant Specialist Group ("AfESG"), the Safari Operators Association of Zimbabwe ("SOAZ"), Safari Club International ("SCI"), individual hunting operators, and others.[2] Most of this data has ***not*** been discussed in the Finding or in an updated finding, in the two-plus years since the Finding was made.

Rather, entire paragraphs in the Finding are identical to the July 22, 2014 negative enhancement finding.[3] Because they are not updated from July 2014, they fail to address points made by Conservation Force and ZPWMA to correct errors in that July finding. Moreover, the Finding states in several places that the FWS was not provided with specific information. However, Conservation Force previously cited to where the information was provided,[4] and ZPWMA submitted additional data in its prompt and thorough July 2015 response ("ZPWMA July 2015 Response") to the FWS' third questionnaire, dated May 12, 2015 (***after*** the Finding). The ZPWMA July 2015 Response was not considered in the Denials, which rely upon the Finding. However, the July 2015 Response provides substantial information the FWS asserts is missing.[5]

This up-to-date information cannot be ignored. It demonstrates that Zimbabwe's hunting program is well-managed and sustainable. It shows how hunting in Zimbabwe enhances the survival of the elephant. The FWS' failure to consider this information requires reconsideration of the Denials. The Finding is based on outdated information, and its reservations have been resolved. Once the new information is considered

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[1] E.g., *Finding*, p. 1, 3, 6, 11.

[2] An index of the information previously submitted to the FWS is attached.

[3] *Enhancement Finding for African Elephants Taken as Sport-Hunted Trophies in Zimbabwe During 2014*, dated July 22, 2014, p. 2 ¶ 6; p. 3 ¶¶ 1-3; p. 4 ¶¶ 1-2; p. 5 ¶¶ 2-3; p. 7 ¶¶ 3-4; p. 8 ¶ 4; p. 9 ¶ 1 (changed "2002 Panel of Experts" to "1997"); p. 9 ¶ 4; p. 10 ¶¶ 1-4; p. 11 ¶¶ 3-5; p. 12 ¶¶ 1-2, 5; p. 13 ¶ 1-2; p. 17 ¶ 3; p. 18 ¶¶ 2, 4; see also paragraphs in which several sentences are identical or nearly so: p. 4 ¶¶ 3-4; p. 5 ¶ 1; p. 6 ¶ 3-4; p. 7 ¶ 2; p. 8 ¶ 3; p. 9 ¶ 3; p. 14 ¶ 4 (changed numbers of RDCs); p. 16 ¶ 4; p. 17 ¶ 5; p. 18 ¶ 3.

[4] Conservation Force also provided an Appendix that cross-referenced statements claiming not to have information against the FWS' April 4, 2014 questionnaire to ZPWMA, which did not ask for much of this information. Conservation Force, *Comment Opposing the Negative Enhancement Finding for African Elephant Taken as Sport-Hunted Trophies in Zimbabwe in 2014*, dated Oct. 16, 2014 ("*CF Oct. Comment*"), passim, & Appendix 1.

[5] E.g., Compare *Finding*, p. 9, 11 (seeking revenue information), p. 11 (seeking offtake information) with ZPWMA July 2015 Response, p. 36-43 (providing revenue and offtake tables).

by the FWS, the "enhancement" generated by elephant hunting is clear, and the requested permits should issue.

The urgency of issuing these permits has not changed since the suspension was imposed in April 2014. As the Finding recognizes, elephant hunting generates operating budget revenue for ZPWMA, incentives for Zimbabwe's community-based natural resources management program (CAMPFIRE), anti-poaching, and more. The information provided, including two CAMPFIRE reports, a SOAZ report, the ZPWMA July 2015 Response and more, makes clear that American elephant hunters are the largest source of these benefits.[6] Continued refusal to issue import permits jeopardizes this enhancement and the survival of the species.

The failure to consider the best-available information is made worse because ZPWMA responded promptly to the FWS' requests. ZPWMA responded to the first questionnaire within two weeks. Its Director-General and high-level representatives immediately traveled to DC to reinforce their response. ZPWMA responded to the second questionnaire in under six weeks; responded to third—not considered in the Finding—in five weeks; responded to the fourth—not considered in the Finding—in two weeks; and responded to the fifth —not considered in the Finding—within several weeks, with the final plan prioritization completed within six months. ZPWMA has repeatedly redirected its resources to provide information to the FWS. But the FWS has repeatedly moved the target to create an unreachable standard and demanded additional, more intensive information. The bar has been raised beyond "enhancement." The FWS has acknowledged that elephant benefit from well-managed hunting.[7] But the Finding seems to require more than well-managed —it seeks management perfection. That is simply not possible, either in Zimbabwe or in this country (even the FWS is constrained by limited resources).

The information submitted shows that licensed, regulated hunting increases habitat security, generates law enforcement funding and support, and incentivizes tolerance for elephant. It shows a sustainable use of elephant at a level far too low to be detrimental. It shows that the enhancement standard, as originally defined[8] has been met. Thus, the Denials should be reconsidered and reversed.

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[6] E.g., *ZPWMA July 2015 Response*, p. 40-41 ("The US hunting market constitutes 51% and 54% of elephant trophy hunting in Zimbabwe for the years 2013 and 2014 respectively."); CAMPFIRE Association, *Trophy Imports Suspension and the CAMPFIRE Program*) (2014), p. 4 (*"CAMPFIRE Association Report"*) (U.S. hunters represent two-thirds or more of CAMPFIRE clients); E. Gandiwa, *Proceedings of the CAMPFIRE Stakeholders' Workshop: Towards the Development of a New Elephant Management Plan and Policy* (Nov. 2014) (*"CAMPFIRE Workshop Proceedings"*), p. 6-21; CAMPFIRE Association, *CAMPFIRE Hunting Income & Distribution* (Dec. 1, 2015) (*"CAMPFIRE Income Analysis"*), p. 6; ZPWMA, Presentation, *Legal Trade, Conservation, and Rural Livelihoods: A Zimbabwean Perspective* (Dec. 2016), p. 19; SOAZ, *Status of Elephant Populations, Hunting, and Anti-Poaching Effort in Safari Areas in Zimbabwe* (2014), p. 3-4 (*"SOAZ Report"*)

[7] E.g., FWS, *Suspension of Import of Elephant Hunting Trophies Taken in Tanzania and Zimbabwe in 2015 and Beyond, Questions & Answers* (2014).

[8] In denying import permits for elephant from Tanzania, the FWS defined enhancement as: "activities that provide a direct benefit to the specie being hunted. Such benefits could include the use of revenue generated by the hunt to support conservation projects or to manage the species. Other benefits that could result from activities that enhance the survival of the species include improving human-wildlife conflicts, anti-poaching efforts, or habitat conservation." According to this standard and definition, and not the one created in the Finding, there is no doubt the importation of sport-hunted elephant into the U.S. enhances the species.

Reason for Reconsideration 2:
The Denials Fail to Consider Zimbabwe's State-of-the-Art Elephant Management Plans

ZPWMA has recently adopted and is implementing the most cutting-edge elephant management regime among range nations, the *Zimbabwe Elephant Management Plan (2015-2020)* ("Plan"). This effort attests to ZPWMA's commitment to elephant management and conservation. The new Plan further exemplifies the importance of sport-hunting in this system. The Denials fail to consider this essential new Plan, which the FWS has had for over one year.

Instead, the outdated Finding errs by considering *Elephant Management in Zimbabwe* to be the country's management plan, despite being told it was not.[9] The FWS' concerns about a claimed lack of measurable outcomes in Zimbabwe's actual former management plan, the *Policy and Plan for Elephant Management in Zimbabwe*, have been resolved. As the FWS was repeatedly told, a new management plan was adopted, with specific action items, deliverables, and deadlines (as suggested was necessary by the April and July negative enhancement findings).[10] The FWS knew of the new Plan's details because the FWS received the *Plan Workshop Proceedings* in December 2014, before the Finding was made.[11] The FWS was also informed that Zimbabwe would manage each main range area adaptively pursuant to a regional plan. The FWS was sent the proceeding of regional workshops, and the final regional plans as part of the final national Plan.[12] And in November 2016, the FWS was provided with information on the implementation and prioritization of these plans at the request of the Chief of Permits.[13] In short, throughout the Plan's drafting, ZPWMA and Conservation Force kept the FWS fully apprised of the status and what the Plan would entail. However, little of this information was considered in the Finding or the Denials.

Had the new Plan been considered, these permits would have to be approved. The Plan incorporates an adaptive management framework with higher-level Targets, Key Components, Strategic Objectives, and Outputs. It breaks each Key Component into specific management actions, the achievement of which will be measured and verified through Key Performance Indicators ("KPIs") and Means of Verification of KPIs. The Plan sets deadlines and assigns specific responsibility for achieving each Action. It focuses on five key components: 1. Protection and Law Enforcement, 2. Biological Monitoring and Management, 3. Social,

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[9] *CF Oct. 2014 Comment*, p. 8 ("Elephant Management in Zimbabwe 'is not a management plan,' and FWS should not expect 'specific measurable or management actions' to be in that particular document") & related attachments.

[10] *CF June 2014 Comment*, p. 13 & related attachments; *CF Oct. 2014 Comment*, p. 9 & related attachments; *CF Dec. 2014 Comment*, p. 3 & related attachments; CF Email to T. Van Norman forwarding invitation to national workshop (Nov. 13, 2014); CF Email to T. Van Norman forwarding Workshop agenda (Dec. 1, 2014); CF Email to T. Van Norman forwarding summary of Plan Workshop (Dec. 5, 2014); *ZPWMA Dec. 2014 Response*, p. 18; *ZPWMA July 2015 Response*, p. 9-14, 18-19.

[11] CF Email to T. Van Norman forwarding Proceedings of the National Elephant Management Plan Workshop (Dec. 23, 2014) ("*Plan Workshop Proceedings*").

[12] CF Email to T. Van Norman forwarding preparatory documents for Sebungwe workshop (May 4, 2015); CF Email to T. Van Norman forwarding Mana Pools Workshop Proceedings (May 5 2015); CF Email to T. Van Norman forwarding Sebungwe workshop agenda (May 8, 2015); CF Email to T. Van Norman forwarding Sebungwe workshop fact sheet (May 14, 2015); CF Email to T. Van Norman forwarding South East Lowveld Workshop Proceedings (Sept. 30, 2015); CF Email to T. Van Norman forwarding final print of Plan (Feb. 29, 2016); *ZPWMA July 2015 Response*, Attachments.

[13] L. Nyaguse (ZPWMA) Email to T. Van Norman forwarding Zimbabwe National Elephant Supplementary Management Plan (2015-2010) (Nov. 9, 2016) ("*Plan Supplement*").

Economic, and Cultural Framework, 4. Building Conservation Capacity, and 5. Coordination, Collaboration, and Program Management.[14]

The Plan breaks down elephant management by range, as their challenges differ. For example, authorities must manage overpopulated elephant and provision of water in North West Matabeleland compared to a reduced population targeted to recover in Sebungwe. These differences are addressed in the actions and indicators of each regional plan.[15]

The Plan provides for accountability, transparency, and effective implementation in the terms of reference for an Elephant Manager tasked with directing elephant management in Zimbabwe. The Plan also created a National Elephant Management Committee and four range-specific committees to review progress and oversee implementation.[16]

Examples of "Protection" activities include establishing a rapid-response anti-poaching unit in conjunction with the Zimbabwe Republic Police, expanding ZPWMA's informer networks, and connecting national law enforcement databases. Monitoring activities include periodic surveys and setting Thresholds of Potential Concern as early-warning indicators in key habitats. An example KPI for "Building Conservation Capacity" is to channel most income from elephant hunting back into elephant management, with ongoing oversight through reports on funds available and utilized.[17] As these examples show, the Plan incorporates ***specific*** actions and KPIs, and specific oversight mechanisms.

The Plan addresses human-elephant conflict in the Social, Economic, and Cultural Framework component. The Plan recognizes there is no single solution to conflict, and commits to "undertake additional research on problem animal control and minimizing conflict." It emphasizes the importance of local communities' tolerance towards elephants through a system of benefits-sharing as a long-term solution to conflict.[18]

The Plan also specifically integrates licensed, regulated elephant hunting as a management tool:

> To have a future, elephant must have a value. Value to the governing authorities and to the local people. The greater the value, the greater the tolerance of them is likely to be ... Regulated sport hunting converts wildlife into assets for the benefit of local people and the country as a whole... elephant and other wildlife populations will be negatively affected though reduced conservation efforts arising from low funding and reduced goodwill from the communities, when... the elephant has the economic potential to raise adequate funds to support itself and other species. For these reasons, Zimbabwe confirms its commitment to the sustainable use of elephant and other wildlife in this Action Plan.[19]

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[14] *Plan*, p. 16-17.

[15] *Plan*, p. 38-80 (Annexes 9.4-9.7).

[16] *Plan*, p. 13-14, 35-37.

[17] E.g., *Plan*, p. 19-27.

[18] *Plan*, p. 15.

[19] *Plan*, p. 12.

The Plan addresses the Finding's concerns on every level. It implements an effective management system, with the necessary "specific goals and measures with specific actions to be taken."[20] Moreover, ZPWMA provided to FWS a 2016 report on its progress in implementing the Plan and prioritizing implementation, including of the regional plans. The Plan Supplement emphasizes law enforcement and training to combat poaching and ivory trafficking.[21] The FWS requested the prioritization, and ZPWMA again demonstrated its good faith in preparing and providing the document, which was not considered in the Finding or the Denials. Because the Finding's concerns are resolved and new information reveals an effective, adaptive management plan and implementation thereof in Zimbabwe, the Denials should be reconsidered and reversed.[22]

Reason for Reconsideration 3:
Zimbabwe has Current Elephant Population Information that Guides its Sustainable Use

The AfESG recently estimated Zimbabwe's elephant population at 82,630 ± 8,589 across a range of 81,228 km^2.[23] Zimbabwe maintains the second-largest elephant population in Africa, at a level nearly double its estimated carrying capacity.[24] The population is most concentrated in the North West Matabeleland and South East Lowveld ranges. The current national estimate is approximately 6,000 lower than the 2001 countrywide estimate, a percentage calculated as "not statistically significant" by the survey's authors.[25] Zimbabwe's current elephant population is 20% larger than its population in 1997 (66,000), when the FWS made a positive enhancement finding. The Finding does not explain why a 20% increase is insufficient.[26]

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[20] *Finding*, p. 6. The Plan applies a multi-tiered approach, using tailored goals leading to achievement of the "Long-Term Vision," which is: "To conserve elephants at levels that will enable them to contribute to the conservation of biodiversity, national development and Zimbabwe's cultural heritage." The Plan establishes intermediate "Targets" to achieving these goals, which are in line with the 1997 *Policy and Plan*: "1. To maintain at least four demographically and genetically viable elephant populations in Zimbabwe[;] 2. To maintain or increase core protected range of elephant in Zimbabwe[;] 3. To maintain numbers/density of elephant at levels that do not adversely impact on biodiversity conservation goals while contributing to economically viable and sustainable wildlife-based land uses in Zimbabwe." As in the draft provided to the FWS in December 2014, the final Plan is organized by "Key Components," and then "Strategic Objectives" that explain the "Key Components." "Outputs" describe the desired outcomes, and are to be achieved through implementation of "Key Activities/Actions." That implementation is monitored by the KPIs and Means of Verification of the KPIs.

[21] *Plan Supplement*, p. 6.

[22] As ZPWMA explained, Zimbabwe conserves and manages elephant on every level. Zimbabwe and bordering range states have formed Trans-Frontier Conservation Areas ("TFCAs") to address the elephant's migratory nature and cross border populations. Further, through the Plan Zimbabwe implements the action plans adopted by the Southern African Development Community ("SADC"), and the SADC Regional Elephant Management Strategy of 2007. E.g., *ZPWMA April 2014 Response*, p. 12; *ZPWMA July 2015 Response*, p. 15; *CF June 2014 Comment*, p. 12 & related attachments; *CF Oct. 2014 Comment*, p. 9 & related attachments.

[23] IUCN/AfESG, African Elephant Status Report 2016 (Sept. 2016), publicly available at https://www.dropbox.com/s/7a8w3kk6r9hzm0r/AfESG%20African%20Elephant%20Status%20Report%202016.pdf?dl=1.

[24] *Plan*, p. 3.

[25] *Plan*, p. 3. As explained above, the Management Plan incorporates regional plans to address challenges unique to each range and manage elephant within regional targets.

[26] The Finding suggests an increase to over 100,000 elephant would be acceptable. P. 8. As ZPWMA, Conservation Force, Rowan Martin, and others pointed out, a population of that size would be a catastrophe for the country's biodiversity. The Finding does not account for the expansion in Zimbabwe's elephant since 1997, or the management measures implemented since then. Zimbabwe's elephant population has rebounded incredibly, from a low of 4,000

Worse, the Finding does not rely on this up-to-date estimate, although the FWS received the preliminary survey results in December 2014.[27] Nor does the Finding rely on the best-available information in the FWS' possession as of March 2015, which included comments from the AfESG and numerous survey results.[28] The Denials should be reconsidered because the Finding relies upon outdated data that was proven to be inaccurate by Conservation Force, ZPWMA, and the AfESG.

For example, the Finding reuses language that cites a statistic from *Elephant Management in Zimbabwe*. The statement was disavowed by its author, and Conservation Force explained how the percent limitation was being taken out of context.[29] The Finding's failure to consider information that undercuts a "fact" on which its negative conclusion was based is clear grounds for reconsideration. Similarly, the Finding admits the April finding erroneously interpreted the AfESG's Elephant Database by misconstruing its data quality categories. This error was pointed out in CF's June 2014 Comment and in a May 30, 2014 email from Dr. Holly Dublin, AfESG Chair.[30] It was corrected in the July enhancement finding.

However, the July finding continued to ignore pertinent information in the database, prompting Dr. Dublin to send a November 3, 2014 comment in which she corrected several critical points of information. First, the addition of a 2007 survey resulted in the addition of 30,000 "Definite" elephant in Zimbabwe. Second, the results of four recent surveys did not show a "substantial decline," as the July finding stated, but largely reflected stable or increasing populations. The Finding apparently accepted these comments, and edited the prior statements to incorporate Dr. Dublin's corrections.[31]

However, Dr. Dublin offered three more corrections not discussed in the Finding. Instead, the challenged language was copied and pasted from the July document into the Finding.

- Dr. Dublin criticized the July finding's dismissal of a 2013 survey in Save Valley Conservancy for so-called "double counting," stating that, even if double-counting occurred, the count still reflected an increase in the elephant population;

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in 1900. *ZPWMA July 2015 Response*, p. 3; *CF June 2014 Comment*, p. 7-8 & related attachments; *CF Oct. 2014 Comment*, p. 7, 10 & related attachments. Compare FWS, *Enhancement Finding for African Elephants Taken as Sport-Hunted Trophies in Zimbabwe* (July 2, 1992), p. 1.

[27] CF Email to T. Van Norman forwarding *Plan Workshop Proceedings*.

[28] H. Dublin Email to T. Van Norman attaching AfESG Letter/Comment on July finding (Nov. 3, 2014), p. 2-9 (*"AfESG Letter"*); Aerial Survey of Elephants and Other Large Herbivores in the Mid-Zambezi Valley; 2007 Aerial Survey of Elephants and Other Large Herbivores in North-West Matabeleland; 2010 Aerial Survey of Elephants and Other Large Herbivores in Chewore Safari Area; 2013 Aerial Survey of Elephants and Other Large Herbivores in the Save Valley Conservancy; and 2013 Aerial Survey of Elephants and Other Large Herbivores in Gonarezhou National Park.

[29] *CF Oct. 2014 Comment*, p. 9, 15 & related attachments.

[30] Compare *Finding*, p. 7; with *CF June 2014 Comment*, p. 9 & related attachments; H. Dublin Email to T. Van Norman commenting on the April finding's misinterpretation of the AfESG Database (May 30, 2014).

[31] Compare *AfESG Letter*, p. 2 ("The AED shows, however, that three surveys carried out in this period ... estimated higher totals than their respective previous, comparable surveys, although the differences were not significant. A fourth survey, Chewore (2010), resulted in an estimate lower than its previous, comparable survey, but the difference was also not statistically significant. Furthermore, the 2010 survey for Chewore did not cover the entire Zambezi Valley ecosystem, and therefore it is possible that the apparent decline, however slight, may be due to elephant movements within the ecosystem rather than to an actual decline.") with July finding, p. 6; *March Finding*, p. 7.

- Dr. Dublin concluded that a 4% carcass ratio in a 2013 survey of Gonarezhou National Park was a "reasonable figure," and the July finding erroneously "conflat[ed] ... carcass ratios ... and mortality rates, and its conclusion is unwarranted";
- Dr. Dublin noted that updated PIKE data was publicly available months before the July finding was made, yet "the finding stated that 2012 and 2013 data were not available," and pointed out that the two PIKE sites in Zimbabwe "have relatively small elephant populations and are by no means intended to be representative of the situation in the country as a whole."[32]

Given that Dr. Dublin is one of the world's foremost experts in elephant, due deference should have been given to her comments and suggestions. Conservation Force made similar points in our June and October comments as well, and provided comments from the authors of the Save Valley survey report responding to the FWS' statements.[33] We provided fice surveys pending the AfESG's review and not included in the AfESG's or FWS' estimates, and submitted updated PIKE information showing the Proportion of Illegally Killed Elephant had declined at the Zimbabwe sites[34]—contrary to the July finding's statements, copied-and-pasted into the Finding. The Denials' failure to review this best-available information, and reliance upon out-of-date or misinterpreted information, requires reconsideration.

Reason for Reconsideration 4: The Best-Available Information Demonstrates that Zimbabwe has been Enforcing its National Regulations as Effectively as Possible

ZPWMA is succeeding in managing and conserving its elephant. The most compelling evidence is the historic increase in its population, to become Africa's second-largest. ZPWMA achieved these results by largely curbing poaching and successfully prosecuting poachers as a result of adaptive and pro-active law enforcement measures. ZPWMA has also implemented a system of sharing responsibility with the private sector and communal landholders so as to share the financial burden of its management and enforcement obligations. The Finding fails to acknowledge these achievements and responsibility-sharing.[35] Its failure to do so requires reconsideration, and reversal of the Denials.

Evidence of ZPWMA's enforcement success was provided in their April 2014 and July 2015 Responses, and in Conservation Forces' June 2014 and October 2014 Comments. For instance, ZPWMA rapidly responded to the 2013 Hwange poisoning incident. Working with the hunting operator's team to track the poachers,

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[32] *AfESG Letter*, p. 4-5.

[33] CF Email to T. Van Norman forwarding response from authors of the Save Valley Conservancy survey (Jan. 6, 2015); *CF Oct. 2014 Comment*, p. 13 & related attachments.

[34] E.g., 2005 Aerial Survey of Elephants and Other Large Herbivores in the Mid-Zambezi Valley; 2007 Aerial Survey of Elephants and Other Large Herbivores in North-West Matabeleland; 2010 Aerial Survey of Elephants and Other Large Herbivores in Chewore Safari Area; 2013 Aerial Survey of Elephants and Other Large Herbivores in the Save Valley Conservancy; and 2013 Aerial Survey of Elephants and Other Large Herbivores in Gonarezhou National Park; *see CF June 2014 Comment*, p. 4-7 & related attachments; *CF Oct. 2014 Comment*, p. 11 & related attachments.

[35] The FWS recognizes "there may be limited resources available for elephant management." *Finding*, p. 2. However, the FWS does not account for this in evaluating ZPWMA's efforts and results. "Enhancement" does not call for unlimited resources and perfect implementation, it seeks benefits. The benefits provided through the sport-hunting of elephant are clear and convincing, and the Denials should be reversed.

ZPWMA successfully arrested all 35 members of the team. ZPWMA's investigation and prosecution efforts led to the deterrent sentencing of each poacher to terms of 9 to 16 years in prison.[36]

ZPWMA specifically responded to the threat of poaching in Hwange by improving radio communications, adding aerial surveillance, and holding 35 public awareness meetings in the area.[37] ZPWMA then stepped-up its anti-poaching nationally by adopting a number of "Urgent Measures." ZPWMA acted to increase poaching penalties, criminalize the use of cyanide in poaching, increase air surveillance of protected areas, collaborate with national law enforcement and military agencies to raise elephant poaching to "a level of National Security in Zimbabwe," improve intelligence-sharing across international borders, and other important undertakings.[38] ZPWMA also held a judiciary awareness program to ensure full implementation of relevant poaching laws and penalties throughout prosecution and sentencing.[39]

ZPWMA directs most of its financial resources to anti-poaching and enforcement. As shown in the July 2015 Response, most of ZPWMA's budget (77%) is allocated for staff costs and patrol provisions.[40] These expenditures fund anti-poaching throughout the elephant range. Despite financial constraints, ZPWMA has been able to continuously hire to expand the number of patrol days in the field. ZPWMA has a staff of 1,504 active field rangers, with the intent to add more.[41] ZPWMA has shown that it can mobilize when called upon: after the Hwange poisoning, a new station with 15 field rangers was established in the area.[42]

Over 80% of spending under the new elephant management Plan has been on law enforcement (anti-poaching) and trainings, with law enforcement identified as the number one priority going forward.[43] The budget and operational data provided in the ZPWMA July 2015 Response and Plan Supplement addresses the FWS' asserted lack of information in the Finding. And although financial constraints exist in Zimbabwe (as in most range states), ZPWMA has effectively and efficiently maximized the impact of every dollar spent on anti-poaching. ZPWMA's results in curbing poaching speak for themselves.

The Finding continues to rely on outdated, unfounded criticisms from the July finding that were corrected by Conservation Force and ZPWMA. First, though the Finding claims not to have received information on Zimbabwe's poaching arrests and prosecutions, that information was not requested until May 2015, yet was provided in ZPWMA's April 2014 Response. It would be unfair to base a negative finding on data that had not been requested. But the data ***was*** provided, and should have been reviewed.[44]

Further, the Denials mistaken rely on the Finding's comments and interpretation of outdated ETIS reports. Conservation Force objected to these reports being taken out of context in our October 2014 Comment,

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[36] *ZPWMA July 2015 Response*, p. 35; *CF Oct. 2014 Comment*, p. 18 & related attachments.

[37] *ZPWMA July 2015 Response*, p. 35; *ZPWMA April 2014 Response*, p. 13; *ZPWMA Dec. 2014 Response*, p. 16-20; *CF Oct. 2014 Comment*, p. 18 & related attachments.

[38] *ZPWMA July 2015 Response*, p. 27-31; *ZPWMA Dec. 2014 Response*, p. 16-18.

[39] *ZPWMA July 2015 Response*, p. 34.

[40] *ZPWMA July 2015 Response*, p. 36-41.

[41] ZPWMA hired 100 rangers in 2014. *ZPWMA July 2015 Response*, p. 32-33.

[42] *ZPWMA July 2015 Response*, p. 27; *ZPWMA April 2014 Response*, p. 13.

[43] *Plan Supplement*, p. 3-4.

[44] *ZPWMA April 2014 Response*, p. 12, 14.

and provided evidence of improvements since 2010.[45] The Finding's reuse of these paragraphs, whose validity and applicability were challenged, merits reconsideration.

Finally, as discussed further under "Local Conservation Efforts," the Parks and Wildlife Act Chapter 20:14 devolved authority to manage and benefit from wildlife on communal and private lands to the landholders. In Safari Areas, ZPWMA leases concessions to pre-qualified hunting operators, which gives them authority to manage and benefit from approved wildlife in those areas.[46] "ZPWMA is engaging private players in co-management in some areas... this will help in resource mobilization and management for law enforcement. Long-term lease agreements (10-25 years) are being entered into to manage some protected areas."[47] In certain areas, ZPWMA partners with safari operators[48]; in others, they partner with non-profits, such as the Tashinga Initiative in the Zambezi Valley and WWF in the Hwange-Sanyati Biological Corridor.[49] In these ways, ZPWMA is sharing responsibility for enforcement of national regulations. This allows ZPWMA to do more with less, and has been especially crucial since receipts from hunting have fallen since the FWS suspension on ivory imports.

Reason for Reconsideration 5: Elephant Hunting in Zimbabwe is a Sustainable, Beneficial Use

ZPWMA's elephant hunting program is sustainable. Information submitted to the FWS demonstrates that quotas and offtakes are responsibly set in a participatory process, considering a range of inputs including all causes of elephant mortality; ZPWMA allocates quotas by region and locality; and recent poaching has remained fairly low, especially in comparison to other range states. This information has been submitted to the FWS on multiple occasions, including but not limited to:

- April 2014: poaching statistics; poacher arrest and prosecution statistics; four-page description of ZPWMA's quota-setting process;
- June 2014: poaching statistics in CAMPFIRE areas;
- December 2014: poaching and PAC statistics; offtake percentages from management, hunting, and trade in skins; two-page supplemental explanation of ZPWMA's quota-setting process;
- December 2014: hunting and PAC offtakes; quota utilization in CAMPFIRE areas;
- December 2014: carcass observance and estimates from the 2014 aerial survey;
- March 2015: updated MIKE/PIKE statistics;
- May 2015: poaching statistics from Mana Pools workshop;
- May 2015: poaching and offtake statistics in the Sebungwe;
- July 2015: carcass observance and estimates from the 2014 aerial survey; PIKE data; offtakes from six categories requested by the FWS; poaching and poacher investigation, arrest, and prosecution statistics; five-page supplemental explanation of ZPWMA's quota-setting process; quota allocation by range;
- September 2015: poaching and hunting offtakes from the South East Low Veld workshop;
- December 2015: hunting off-takes and quota utilization in CAMPFIRE areas;

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[45] *CF Oct. 2014 Comment*, p. 22 (pointing out that the ETIS report was known to "confound" legal and illegal trade in small ivory products) & related attachments.

[46] *ZPWMA April 2014 Response*, p. 23-25.

[47] *ZPWMA Dec. 2014 Response*, p. 19.

[48] *ZPWMA July 2015 Response*, p. 34.

[49] *ZPWMA July 2015 Response*, p. 33.

- December 2016: two-page supplemental explanation of ZPWMA's quota-setting process;
- And more.[50]

This long list of information provided refutes the Finding's complaint that the FWS did not have "adequate information" about elephant offtakes, poaching, or quota-setting. The information was available. But the Denials do not consider it. If it had been considered, the FWS would have had to make a positive finding.

This best-available information demonstrates that ZPWMA's quotas are "scientifically determined" not to "compromise[e] [the species'] biological proliferation... In Zimbabwe, determination and implementation of hunting quotas goes through a rigorous quota-setting methodology" that accounts for all mortalities, including from hunting, poaching, PAC, natural causes and disease. In setting quotas, ZPWMA considers population sizes, trends, and densities; property sizes and habitat quality; environmental changes; human-wildlife conflict, national policies, and management targets; poaching trends; land tenure; trophy quality; hunt success; ranger monitoring; species sensitivity and research on the species; and more.[51] Quotas are set in participatory workshops for each range area. While stakeholders may propose an initial quota, their proposals are reviewed and revised as needed by ZPWMA ecologists to ensure the quotas are assessed at a sustainable level, having negligible impact on the population.[52] In 2014, Zimbabwe's offtake quota was set under 300 elephant; in 2016, it was set at 400.[53] The level of ***offtake*** authorized is well below that of ***export*** allowed under Zimbabwe's CITES quota (500 elephant), for good reason—exports may be delayed due to transport, taxidermy/processing, or permitting issues.

ZPWMA's 2014 quota of 300 mature elephant bulls represents only 0.37% of the total elephant population (82,000+). Zimbabwe's 2016 quota represents only 0.49%. These percentages are comfortably below the sustainability threshold of 0.6-0.75%. Most critically, however, actual offtakes are even lower, on average only 204 mature elephant bulls per year. That represents only 0.25% of Zimbabwe's elephant population. The Denials should be reconsidered and reversed, as there can be no question this limited use of elephant through sport- hunting is sustainable.

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[50] *ZPWMA April 2014 Response*, p. 12, 14, 19-22; *CAMPFIRE Association Report*, p. 2; *ZPWMA Dec. 2014 Response*, p. 16, 22-25; *CAMPFIRE Workshop Proceedings*, p. 6-24; CF Email to T. Van Norman attaching newest MIKE/PIKE data (Mar. 11, 2015); *Proceedings of the Mana Pools Anti-Poaching Workshop* (May 2015); CF Email to T. Van Norman attaching background data on elephant in the Sebungwe range (May 11, 2015); *ZPWMA July 2015 Response*, p. 22-27, 43-49; *Proceedings of the South East Lowveld Elephant Management Planning Workshop* (Sept. 2015); CF Email forwarding *Hunting Income Analysis of CAMPFIRE Districts from Hunting* (Dec. 1, 2015); ZPWMA, Presentation, *Legal Trade, Conservation, and Rural Livelihoods: A Zimbabwean Perspective* (Dec. 2016), p. 5-6.

Publicly available data from the Great Elephant Census identified Zimbabwe as having one of the four lowest carcass ratios in Africa, behind only Uganda, Malawi, and Botswana, publicly available at www.greatelephantcensus.org.

[51] E.g., *ZPWMA Apr. 2014 Response*, p. 19-22; *ZPWMA Dec. 2014 Response*, p. 22-25; *ZPWMA July 2015 Response*, p. 43-47; ZPWMA, Presentation, *Legal Trade, Conservation, and Rural Livelihoods: A Zimbabwean Perspective* (Dec. 2016), p. 5-6.

[52] *ZPWMA July 2015 Response*, p. 43-46; ZPWMA, Presentation, *Legal Trade, Conservation, and Rural Livelihoods: A Zimbabwean Perspective* (Dec. 2016), p. 5-6. Licensed, regulated hunting has nominal effect on elephant population, because of the selectivity of the harvest. E.g., *CF June 2014 Comment*, p. 3, 9-10 & related attachments (including R. Martin, *Second Report: Trophy Hunting from Declining Population* (2014), p. 8, 10, 15, 18-20, & R. Martin, *Background Study, Elephants* (2015), p. 34, 56).

[53] *ZPWMA July 2015 Response*, p. 44, 46.

Further, the extensive documentation provided by ZPWMA, Conservation Force, and others demonstrates that other offtakes, including poaching and PAC, are sustainable. Poaching has largely been controlled in the last several years, and PAC is kept in check through the incentives generated by CAMPFIRE (please see the next section).[54]

Poaching levels have declined in Zimbabwe, and across Africa, since the worst of the impact in 2011.[55] As shown in ZPWMA's July 2015 Response, a decline in elephant poaching is evident since the high of 223 in 2011, to 212 in 2012 and 194 in 2014. (Poaching figures in 2013 are skewed by the mass poisoning incident at Hwange National Park that killed 103 elephant, but if that number is "normalized" to 190, it is consistent with the decreasing trend.)[56] Likewise, the Proportion of Illegally Killed Elephants ("PIKE") at the Chewore and Nyami Nyami Monitoring the Illegal Killing of Elephants ("MIKE") sites in Zimbabwe has fallen: to 0.40 in 2013, 0.17 in 2014, and 0.29 in 2015 at Chewore, and from 0.81 in 2011 to 0.27, 0.22, 0.37, and 0.35 in the years 2012 to 2015 at Nyami Nyami. The most recent figures are well below the 0.5% threshold which signifies unsustainable poaching.[57] The decline in poaching undoubtedly stems from ZPWMA's enhanced anti-poaching, as described in the section above.

Recognizing both a mutual interest, and that collaboration will allow for a more efficient use of resources, ZPWMA and the hunting sector collaborate extensively in anti-poaching. Conservation Force submitted numerous specific evidence of this.[58] A few examples from this evidence are below:

- The Dande Anti-Poaching Unit ("DAPU") in the Zambezi Valley has catalyzed a significant decrease in poaching in their areas. In 2010, DAPU reported 40 elephant carcasses. In 2016, they observed seven. DAPU team members have grown so skilled in anti-poaching tactics they work alongside ZPWMA rangers in patrolling Mana Pools National Park. Charlton McCallum Safaris spent $95,006 on DAPU's anti-poaching activities in 2016, including salaries, rations, rewards, equipment, and

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[54] PAC offtakes have been between 44-52 elephant from 2013-2015, a negligible amount in a population over 82,000 elephant, and at or below 1.0% when added to poaching and hunting offtakes. ZPWMA issues few PAC permits, and instead relies on the benefits of the CAMPFIRE program and voluntary actions of hunting operators to minimize crop-raiding and losses to elephant, and thus minimize PAC. The CAMPFIRE Workshop demonstrated that this system is working, as PAC figures were typically low across the districts. *CAMPFIRE Workshop Proceedings*, p. 6-21; *see also CF June 2014 Comment*, p. 15-7 & related attachments; *CF Oct. 2014 Comment*, p. 26-33 & related attachments; *CF Dec. 2014 Comment*, p. 3-7 & related attachments; *CF Jan. 2015 Comment* & related attachments.

The uncited "anecdotal evidence" relied upon in the Finding is unreliable, and is another incorrect "fact" on which the negative finding was based that requires reconsideration.

[55] G. Wittmeyer et al., *Illegal Killing for Ivory Drives Global Decline in African Elephants*, Proceedings of the National Academy of Sciences (July 22, 2014).

[56] *ZPWMA July 2015 Response*, p. 43.

[57] *CF Oct. 2014 Comment*, p. 21-22 & related attachments; CF Email to T. Van Norman attaching updated MIKE/PIKE data (Mar. 11, 2015); *ZPWMA July 2015 Response*, p. 25; CITES/MIKE Database, publicly available at https://cites.org/eng/ prog/mike/data_and_reports.

[58] E.g., *CF June 2014 Comment*, p. 17-19 & related attachments (including SOAZ report); *CF Oct. 2014 Comment*, p. 22, 26-33 & related attachments; *CF Dec. 2014 Comment*, p. 3-7 & related attachments; *CF Jan. 2015 Comment* & related attachments; *Proceedings of the Mana Pools Anti-Poaching Workshop* (May 2015); CF Email to T. Van Norman forwarding reports of anti-poaching efforts in Zambezi Valley (Dec. 3, 2015); CF Email to T. Van Norman forwarding hunting operator anti-poaching efforts in Zambezi Valley (Jan. 5, 2016); CF Email to T. Van Norman forwarding DAPU film (May 9, 2016); CF Emails to T. Van Norman forwarding DAPU Reports (June 15, 2015, May 23, 2016, & Jan. 18, 2017).

vehicles. DAPU's expenditures in 2015 topped $80,000 and in 2014, they were over $72,000. This is an expanding program, and has contributed significantly to anti-poaching in the Zambezi Valley, including through the additional support of aerial surveillance. ***Mr. Jines' hunt took place in the Mbire District and with Charlton McCallum Safaris. Mr. Jines' hunting fees, including his trophy fee and voluntary contributions, are directly contributing to DAPU and the operators' extensive community investment***.

- The SOAZ Report identified almost $1 million spent on anti-poaching in 2013 by a small sample of 14 operators. These operators employed a total of 245 scouts on the ground, an average of 17-18 scouts per company.
- Lodzi Hunters collaborates with the Binga district council to restore wildlife in their concession, on which they have a long-term lease. They maintain a 12-member anti-poaching team that patrols the concession and the borders of Hwange National Park. Lodzi Hunters coordinates with ZPWMA to ensure full and efficient coverage. Lodzi Hunters' anti-poaching and incentives programs cost the company over $350,000 per year, in addition to their contractual payments to the CAMPFIRE district and wards. 95% of Lodzi Hunters' income comes from elephant hunting.

In short, the private-sector's contributions against poaching are extensive. They were not duly considered in the Denials, even though they are an essential component of Zimbabwe's elephant management.[59] For this reason, the Denials should be reconsidered, and will need to be reversed based on proper evaluation of the submitted data.

Reason for Reconsideration 6: Revenues Generated from Elephant Hunting in Zimbabwe are Reinvested in Elephant Conservation Efforts by ZPWMA and CAMPFIRE Communities

The information provided to the FWS documents that elephant hunting accounts for the largest percent of revenue generated by hunting across all four land categories (safari areas, communal land, private land, and forestry areas). In 2014, over $6.2 million in trophy fees was generated from elephant hunts, with $5 million of that revenue accruing to ZPWMA to reinvest in wildlife management and enforcement.[60] Over 50% of that revenue comes from U.S. hunters.[61] Put differently, "the African elephant is one of the biggest drawcard species from a hunting perspective and is at the centre of all the major hunts... Generally hunting contributed an average of USD22m to the country's GDP in 2014 and 2015..."[62]

A significant portion of ZPWMA's operating budget relies upon hunting income (although that proportion declined in 2015, as hunting income has decreased, largely due to the FWS' elephant suspension and non-issuance of lion import permits).[63] Most of this is attributable to elephant hunts. In turn, most of ZPWMA's operating funds are directed to ranger salaries, anti-poaching, and law enforcement—over $3.1 million in Safari Areas alone (and staff costs in Safari Areas are covered by hunting revenues). Put simply, most of the revenues coming in from elephant hunting are reinvested in and contribute to the protection and

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[59] *Plan*, p. 12 ("The Role of Sport Hunting in Elephant Conservation").

[60] *ZPWMA July 2015 Response*, p. 48.

[61] *ZPWMA July 2015 Response*, p. 41.

[62] ZPWMA, Presentation, *Legal Trade, Conservation, and Rural Livelihoods: A Zimbabwean Perspective* (Dec. 2016), p. 9-10.

[63] *ZPWMA Dec.* 2014 *Response*, p. 21.

recovery of elephant by being reinvested in law enforcement and anti-poaching.[64] The Denials' failure to consider the July 2015 Response and information about ZPWMA's revenue, budget, and expenditures requires reconsideration and reversal.

In communal areas, elephant hunting is the financial backbone of CAMPFIRE. CAMPFIRE is the mechanism whereby communities benefit from living with wildlife, and largely from living with elephant. The program has built tolerance within communities through creation of incentives, especially due to the funding of infrastructure projects that improve rural livelihoods across communities.[65] The Finding correctly admits that "CAMPFIRE plays a role in elephant management." More precisely, CAMPFIRE plays an ***essential*** role in elephant conservation by reducing conflicts between elephant and the communities who maintain elephant on their lands. Zimbabwe's Parks and Wildlife Act Chapter 20:14 empowered rural people living among wildlife to effectively benefit from it. CAMPFIRE is the mechanism created to facilitate this.

From 1989-2006, CAMPFIRE channeled more than $20 million to rural villages and $17 million to rural district councils.[66] From 2010-2015, hunting fees accounted for over $11 million in revenue, 70% of which came from elephant hunting (until the suspension reduced demand for elephant hunting), and two-thirds of which came from U.S. elephant hunters. Put differently, over $5 million accrued directly to CAMPFIRE communities from U.S. elephant hunters until the suspension reduced that amount, e.g., to 54% of hunts in 2014.[67] (Until then, 70% of CAMPFIRE revenue was generated by elephant hunts and $550,000 in trophy fees alone were generated in communal lands in 2014.[68]) These income receipts are "often understated," as economic multipliers "are not captured as part of CAMPFIRE income," and "[t]he proportion of safari operating expenses paid locally in the form of wages and salaries, and purchase of materials is often not recorded."[69]

According to the most recent audit of participating CAMPFIRE districts, "Data from 9 CAMPFIRE Districts ... shows that approximately 60% of the allocated quota is utilized and that the majority of hunters (53%) originate from America. These hunters have contributed US$9 million ... during the period 2010-2015 compared to US$8 million by the 40 other nations.... The income generated from trophy fees in the last 6

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[64] *ZPWMA July 2015 Response*, p. 36-41, 48-51; ZPWMA, Presentation, *Legal Trade, Conservation, and Rural Livelihoods: A Zimbabwean Perspective* (Dec. 2016), p. 9-10.

[65] E.g., *CAMPFIRE Association Report*, p. 1-11; *CAMPFIRE Workshop Proceedings*, p. 6-24; CF Email to T. Van Norman attaching *CAMPFIRE Income Analysis*; CAMPFIRE Association, *The Role of Trophy Hunting of Elephant in Support of the Zimbabwe CAMPFIRE Program* (Dec. 2016), p. 12-16 ("*CAMPFIRE—Role of Hunting Report*"), publicly available at http://campfirezimbabwe.org/index.php/downloads.

[66] *CAMPFIRE Association Report*, p. 8; *CAMPFIRE—Role of Hunting Report*, p. 9-11; ZPWMA, Presentation, *Legal Trade, Conservation, and Rural Livelihoods: A Zimbabwean Perspective* (Dec. 2016), p. 19, (U.S. hunters make up 76% of CAMPFIRE clients).

[67] *CAMPFIRE Association Report*, p. 3-4; *CAMPFIRE Income Analysis*, p. 1, 6 ("it is highly probable that the decline in hunting income for 2014 was largely caused by the suspension of trophy imports by United States of America. The suspension has a lag effect on income, and preliminary calculations of earnings for 2015 indicate a further continuing decline."); *CAMPFIRE—Role of Hunting Report*, p. 9-11.

[68] *ZPWMA July 2015 Response*, p. 48, 50; *see also CAMPFIRE Workshop Proceedings*, p. 6-24.

[69] ZPWMA, Presentation, *Legal Trade, Conservation, and Rural Livelihoods: A Zimbabwean Perspective* (Dec. 2016), p. 17; *see also* p. 11-20.

years (2010 – 2015) is approximately US$11.4 million of which elephant trophy fees contributed 65%."[70] In short, U.S. elephant hunters are the critical source of funds for CAMPFIRE communities.

Hunting funds are invested in projects that benefit the communities overall: building classrooms or clinics; purchasing farm equipment; rehabilitating water supplies; purchasing vehicles used in wildlife monitoring and anti-poaching; installing solar power; and many other infrastructure improvements. CAMPFIRE links these tangible benefits for rural residents to protection of wildlife. Its infrastructure creates conservation officers and monitoring programs, and employs game scouts, which generates significant benefits for the elephant as well. This is vital because otherwise elephant are largely viewed as threats, not assets.[71]

The grant of Appropriate Authority means that ZPWMA foregoes the fees from hunting in CAMPFIRE areas, and the fees and other benefits accrue to the communities. Operators in CAMPFIRE communities contract with the district councils, and are bound to pay trophy, concession, and other fees—or more, depending on their contracts—to the councils (41%) and to the wards directly (55%). Conservation Force submitted documentation evidencing that many operators contribute much more than just fees. For example, in the Mbire District in which Mr. Jines hunted, Charlton McCallum Safaris operates a "genuine joint venture" with the Mbire district council and wards. In 2013-2015, Charlton McCallum Safaris paid over $1.05 million in fees and revenue-sharing, including over $470,000 directly into ward accounts. The district significantly benefits from this partnership, including: constructing a clinic and nurses' houses; constructing a wildlife administration office; constructing storerooms; constructing 14 classroom blocks, seven teachers' houses, and one school office; constructing and equipping of grinding mills; and constructing and equipping two hand-pump boreholes, water pipes, toilets, water storage; constructing one tourist camp; acquiring two tractors.[72] 90% of the district's income comes from hunting and ~35% of that is from elephant hunting. 90% of hunting clients are U.S. citizens. In short, at least $330,750 accrued to the Mbire district and rural communities as a result of U.S. elephant hunters in 2013-2015.[73] This is but one example. Conservation Force has submitted evidence of many more, including contributions of Lodzi Hunters and Martin Pieters Safaris, among others.[74]

The Denials do not consider the best-available information. They rely upon the Finding, which cites to old and limited data on CAMPFIRE. The best-available information demonstrating CAMPFIRE's benefits must be evaluated, and accordingly, the Denials should be reconsidered and reversed.

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[70] *CAMPFIRE—Role of Hunting Report*, p. ii.

[71] *CAMPFIRE Association Report*, p. 3-4, 7-11; *CAMPFIRE Income Analysis*, p. 1-2; *CAMPFIRE—Role of Hunting Report*, p. 9-19; ZPWMA, Presentation, *Legal Trade, Conservation, and Rural Livelihoods: A Zimbabwean Perspective* (Dec. 2016), p. 20-22. *See also CAMPFIRE—Role of Hunting Report*, p. ii (in the period 2009-2015, "96 human lives were lost to wildlife attacks, with elephant accounting for more than half of those deaths. Yet despite these challenges, communities still retain a high level of tolerance for elephants, but this support is rapidly dissipating as a result of the loss of income from trophy hunting. This places almost two million ha of land at risk, including the risk of increasing retaliatory killing through poisoning and illegal wildlife crime.").

[72] Chief Sen. D. Chisunga, *Land Use Planning at the Local Level*, Presentation at the 14th African Wildlife Consultative Forum (Nov. 10, 2015).

[73] *CF Dec. 2014 Comment*, p. 3-7 (citing Charlton McCallum Safaris, Elephant Hunting in Mbire District – A Perspective of the Private Sector (Nov. 17, 2014) & related attachments.

[74] Please see attached Index of Information Submitted.

Reason for Reconsideration 7:
Local Conservation Efforts Effectively Share the Responsibilities of Elephant Conservation

The Denials should be reconsidered because Conservation Force, ZPWMA, SOAZ, and others have provided extensive documentation of the benefits to elephant generated by "local conservation efforts." The FWS does not discuss this information specifically, but it should. This information proves that the contributions of safari operators, anti-poaching units, CAMPFIRE communities, private landholders/conservancies, and associated non-profits are integral to the functioning of Zimbabwe's wildlife management system. They are not "limited" efforts. They are extensive, and reduce the burden on ZPWMA's resources.

As Conservation Force and ZPWMA previously explained, conservation work is ***frequently*** carried out by non-governmental entities in Zimbabwe.[75] The Parks and Wildlife Act Chapter 20:14 devolved Appropriate Authority to private and communal landholders. Through this "government mechanism," the "legal right to utilize and manage wildlife on their property" was transferred to the landholders.[76] Due to this transfer, non-governmental entities such as safari operators, CAMPFIRE district councils, and private conservancies have both the authority and the obligation to protect, conserve, monitor, and benefit from wildlife in their areas.[77] As ZPWMA wrote:

> Fundamentally, ZimParks supports local efforts by providing a conducive legislative and policy environment which allows the private and community sectors to thrive. The grant of Appropriate Authority Status to private properties and Rural District councils is a case in point.[78]

ZPWMA supports local conservation efforts through training, support, and more.

The contributions of non-governmental interest to wildlife conservation are not limited or localized. Taken together, they cover the country.[79] A few examples from the information provided to the FWS are below:

- Lodzi Hunters, in the Northwest Matabeleland and Sebungwe ranges, contributed over $680,000 over two years to CAMPFIRE wards, to improve livelihoods, employ scouts, and increase tolerance of elephant and other species. The operator also maintains a twelve-person anti-poaching team.[80] Similarly, Charlton McCallum Safaris in the Zambezi Valley shares revenues with Mbire CAMPFIRE wards and the district council. In two years, the fees shared topped $750,000 (of which $380,000+

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[75] *ZPWMA April 2014 Response*, p. 15-16, 23-25; *CF Oct. 2014 Comment*, p. 28 & related attachments; *see also* R. Martin, *Personal Comment: Ban on the Import of Elephant Trophies into the USA from Tanzania and Zimbabwe* (Oct. 2014), p. 6 & attachment, M. Murphree & R. Martin, *Shifting Paradigms, Policy and Processes in Conservation and Development over the Past Four Decades* (2013).

[76] *ZPWMA April 2014 Response*, p. 15-16.

[77] *ZPWMA Dec. 2014 Response*, p. 18-21 ("This arrangement [Appropriate Authority] incentivizes landowners and tenants to not only tolerate wildlife, but to conserve and promote conservation and protection of wildlife..."), p. 25-27 (identifying contributions of safari operators, NGOs, conservancies, communal areas to wildlife conservation).

[78] *ZPWMA April 2014 Response*, p. 25.

[79] Please see attached map, which shows the breadth of these "local" operations.

[80] *CF Jan. 2015 Comment* & related attachments.

went directly to ward accounts) and anti-poaching expenditures topped $150,000.[81] Each of these operators is lessening the government's burden of community support and anti-poaching patrols by committing their private resources to these purposes.

- A small operator, Pro Safaris in the Zambezi Valley, allocates 6% of its turnover for water pumping, water pan installation, and other conservation activities. Pro Safaris maintains a ten-person anti-poaching team to patrol a 40-km international border,[82] which allows ZPWMA rangers to focus on patrolling the national park instead of the Safari Area.
- The Tashinga Initiative is a non-profit in the Zambezi Valley that obtains anti-poaching equipment, coordinates anti-poaching efforts, and organized the Sebungwe elephant management planning workshop. The Tashinga Initiative is supported by local safari operators (hunting and photo), and international donors like the Houston Safari Club.[83]
- Also in the Zambezi Valley/Sebungwe range, Martin Pieters Safaris maintains three patrol teams, and are helping develop a community-owned conservancy with two additional patrol teams. The company teams have recovered 15,000+ snares since 2007, and their nearly 300 patrols support ZPWMA's monitoring in this area. The community scouts were intensively trained by the operator teams. These scouts cooperate with ZPWMA against poaching in the Omay and Gokwe communal lands.[84]
- Save and Bubye Valley Conservancies in the Southeast Lowveld range each spend over $500,000 annually on anti-poaching and invest another $200,000+ in nearby villages. The conservancies do not draw on ZPWMA resources at all. They are wholly responsible (and largely depend on hunting income) to secure a land area about the size of New Jersey, the world's third-largest black rhino population, and an elephant population that exceeds 2,000.[85]
- CAMPFIRE communities monitor poaching losses and PAC off-take. They collaborate with ZPWMA to detect poaching and have developed a mutual informer network together. They also work with ZPWMA and safari operators to avoid problem animal off-takes and non-destructively deter crop-raiding elephant.[86] Because they have Appropriate Authority, they collaborate with ZPWMA, but do not need to depend on ZPWMA for wildlife management.
- The SOAZ report included data from 14 operators across the entire elephant range. It reported on these operators' monitoring of elephant populations and poaching losses and their anti-

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[81] *CF Dec. 2014 Comment*, p. 5-6 & related attachments; *CF Jan. 2015 Comment* & related attachments; CF Email to T. Van Norman forwarding DAPU film (May 9, 2016); CF Emails to T. Van Norman forwarding DAPU Reports (June 15, 2015, May 23, 2016, & Jan. 18, 2017).

[82] *Pro Safaris Report* (2016).

[83] E.g., CF Email to T. Van Norman forwarding information on anti-poaching in the Zambezi Valley and Sebungwe (Nov. 30, 2015); CF Email to T. Van Norman forwarding Tashinga Initiative press release (May 22, 2016); CF Email to T. Van Norman forwarding article on success in building new communications base (Nov. 14, 2016).

[84] Martin Pieters Safaris, *Blog Posts*, publicly available at http://www.martinpieterssafaris.com/blog/.

[85] B. du Preez et al., *Sport-Hunting and Lion (Panthera leo) Conservation in Zimbabwe* (Jan. 31, 2016); B. du Preez, *Bubye Valley Conservancy Lion Research Report* (Jan. 12, 2016); R. Groom, *Hunting in Zimbabwe's Save Valley Conservancy* (Jan. 27, 2013).

[86] *See generally CAMPFIRE Workshop Proceedings.*

poaching investment of almost $1 million in 2013. The 14 companies together employed 245 anti-poaching personnel, and cooperated closely with ZPWMA.[87]

The Finding highlights the Mana Pools elephant management planning workshop. It should also mention the Sebungwe and South East Lowveld workshops. They exemplify the public-private-communal partnership existing in Zimbabwe because stakeholders have Appropriate Authority. The Finding reveals the FWS' misunderstanding of Zimbabwe's conservation system, which requires reconsideration and reversal of the Denials.[88]

Reason for Reconsideration 8: Enhancement has been Shown

The FWS has defined "enhancement" as benefits to the species, such as protection of habitat, generation of conservation and anti-poaching funding, and reduction of human-wildlife conflicts through generation of conservation incentives. The information submitted to the FWS demonstrates that licensed, regulated hunting of elephant in Zimbabwe satisfies this standard. This information shows how hunting justifies the existence of significant elephant range.[89] It substantiates the anti-poaching partnership among ZPWMA, hunting operators, and communities, and demonstrates the success of their efforts (declining PIKE). It shows that communities are incentivized not to retaliate against elephant (low PAC offtakes). It describes the pre-suspension benefits generated for CAMPFIRE communities. The success of Zimbabwe's elephant management is underscored by the fact there are over 80,000 elephants in the country, and significant anti-poaching gains in the border area of the Zambezi Valley.

The FWS demands "enhancement." It has been shown. Sustainable offtakes have been shown. A stable elephant population has been shown. A well-managed and responsive elephant management system has been proven. The continued suspension obstructs this enhancement from reaching the elephant—and the people—of Zimbabwe. We encourage the FWS to stop moving the target. The FWS cannot continue to rely upon a Finding that ignores the facts.

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[87] *SOAZ Report*, p. 4.

[88] The Finding's first sentence is almost verbatim to the July finding, and still fails to respond to CF's objections on this point. We objected that we did not "emphasize the economic impact of the suspension to local conservation efforts," though that information was available in our submissions. The Finding's failure to respond to this objection, and its cutting-and-pasting of prior writing, merits reconsideration; it clearly does not consider the best-available and most current information. Note that the attachments in CF's comment also pointed to data showing "whether and to what extent these individuals would reduce their conservation efforts based on the inability of U.S. hunters to import a sport-hunted trophy," e.g., in the submitted Declarations, Charlton McCallum Safaris and DAPU documents, SOAZ Report, CAMPFIRE Reports, R. Martin Fourth Report, and more. E.g., *CF June 2014 Comment* Attachments; *CF Oct. 2014 Comment* Attachments.

[89] It should be noted that there is far more land secured in areas which allow, and largely rely upon, sustainable use. Compare the approximately 27,000 km^2 of habitat in national parks to the approximately 19,000 km^2 in Safari Areas, ~48,000 km^2 in CAMPFIRE areas, and 7,000+ km^2 in conservancies.

IUCN/UN, Protected Planet, http://blog.protectedplanet.net.

Given all this information, the Applicants request reconsideration, and reversal of the Denials.

Respectfully submitted,

Conservation Force
3240 S. I-10 Service Road W., Suite 200
Metairie, Louisiana 70001-6911
Phone: 504-837-1233
Fax: 504-837-1145
Email: cf@conservationforce.org

CC: Bryan Arroyo
Dr. Rosemarie Gnam

Attachments: Index
USB containing information submitted to the FWS by Conservation Force and ZPWMA
Map of "Local Conservation Efforts"

Index of Information Produced by Conservation Force, ZPWMA, and AfESG
In Support of Re-Opening Import of Sport-Hunted Elephant Trophies from Zimbabwe

Date	Producer	Document
7/2/1997	FWS	Positive enhancement finding
4/4/2014	FWS	First questionnaire to ZPWMA
4/4/2014	FWS	Negative enhancement finding
4/17/2014	FWS	Negative enhancement finding revised
4/17/2014	ZPWMA	Response to April 4, 2014 questionnaire sent to FWS, including all attachments ("ZPWMA April 2014 Response")
5/30/2014	AfESG	Email from H. Dublin to R. Gabel, subject "Clarification regarding Zimbabwe data"
6/6/2014	CF	First comment on April 2014 enhancement finding and publication in the Federal Register, including all attachments ("CF June 2014 Comment")
6/25/2014	CF	Email to T. Van Norman forwarding email from E. Chidziya/ZPWMA regarding National Elephant Management Plan Workshop
7/22/2014	FWS	Negative enhancement finding
10/4/2014	R. Martin	Personal comment and attachments sent to FWS
10/21/2014	CF	First comment on July 2014 enhancement finding, including all attachments ("CF Oct. 2014 Comment")
10/31/2014	FWS	Second questionnaire to ZPWMA
11/3/2014	AfESG	Email from H. Dublin to T. Van Norman attaching AfESG letter/ comment on July finding ("AfESG Nov. 2014 Letter")
11/13/2014	CF	Email to T. Van Norman forwarding invitation to National Elephant Management Plan Workshop
12/1/2014	CF	Email to T. Van Norman forwarding Agenda for Plan Workshop
12/5/2014	CF	Email to T. Van Norman attaching PowerPoint with survey results
12/5/2014	CF	Email to T. Van Norman summarizing outcomes of Plan Workshop
12/10/2014	ZPWMA	Response to October 31, 2014 questionnaire sent to FWS, including all attachments ("ZPWMA Dec. 2014 Response")
12/15/2014	CF	Second comment on July 2014 enhancement finding, including all attachments ("CF Dec. 2014 Comment")
12/16/2014	CF	Email to T. Van Norman forwarding CAMPFIRE Workshop proceedings
12/23/2014	CF	Email to T. Van Norman forwarding national Plan Workshop Proceedings
1/6/2015	CF	Email to T. Van Norman forwarding comments from the authors of the Save Valley Conservancy 2013 survey
1/12/2015	CF	Email to T. Van Norman forwarding invitation to Mana Pools Elephant Management Plan Workshop
1/19/2015	CF	Third comment on July 2014 enhancement finding, attaching Lodzi Hunters and Charlton McCallum Safari documents to substantiate enhancement/community investment ("CF. Jan. 2015 Comment")
1/23/2015	CF	Email to T. Van Norman with comment cover letter
3/3/2015	CF	Email to T. Van Norman forwarding article on ZPWMA anti-poaching success
3/11/2015	CF	Email to T. Van Norman attaching recent CITES/MIKE update

Index of Information Produced by Conservation Force, ZPWMA, and AfESG
In Support of Re-Opening Import of Sport-Hunted Elephant Trophies from Zimbabwe

Date	Producer	Document
3/11/2015	CF	Email to T. Van Norman forwarding invitation to rescheduled Mana Pools Elephant Management Plan Workshop
3/26/2015	FWS	Negative enhancement finding ("Finding")
4/13/2015	CF	Email to T. Van Norman forwarding article regarding effect of FWS suspension on CAMPFIRE
5/4/2015	CF	Email to T. Van Norman forwarding invitation to Sebungwe Elephant Management Plan Workshop
5/4/2015	CF	Email to T. Van Norman forwarding preparatory document for Sebungwe Workshop
5/5/2015	CF	Email to T. Van Norman forwarding study on elephant in the Sebungwe range
5/5/2015	CF	Email to T. Van Norman forwarding Mana Pools Workshop Proceedings
5/8/2015	CF	Email to T. Van Norman forwarding agenda for Sebungwe Workshop
5/11/2015	CF	Email to T. Van Norman forwarding background document on elephant populations in the Sebungwe range
5/12/2015	FWS	Third questionnaire to ZPWMA
5/14/2015	CF	Email to T. Van Norman forwarding fact sheet on Sebungwe Workshop
6/15/2015	CF	Email to T. Van Norman forwarding DAPU First-Quarter Report
7/20/2015	ZPWMA	Response to May 12, 2015 questionnaire sent to FWS, including all attachments ("ZPWMA June 2015 Response")
9/30/2015	CF	Email to T. Van Norman forwarding South East Lowveld Workshop Proceedings
11/30/2015	CF	Email to T. Van Norman forwarding A. Pole/AWF email describing Cabinet subcommittee meeting
11/30/2015	CF	Email to T. Van Norman forwarding email from L. Taylor regarding anti-poaching efforts in Sebungwe range (confidential)
12/1/2015	CF	Email to T. Van Norman forwarding analysis of income to CAMPFIRE districts from licensed, regulated hunting ("CAMPFIRE Income Analysis")
12/3/2015	CF	Email to T. Van Norman forwarding anti-poaching reports in the Mana Pools National Park area
12/7/2015	CF	Email to T. Van Norman attaching two presentations, one made by the CAMPFIRE Association and one made by Chief Chisunga of the Masoka Ward in the Mbire District
1/5/2016	CF	Email to T. Van Norman forwarding information about anti-poaching in the Zambezi Valley (confidential)
2/22/2016	CF	Email to T. Van Norman attaching article regarding ZPWMA ant-poaching success
2/24/2016	CF	Email to T. Van Norman including link to video regarding Bubye Valley Conservancy
2/29/2016	CF	Email to T. Van Norman forwarding final print of National Elephant Management Plan ("Plan")

Index of Information Produced by Conservation Force, ZPWMA, and AfESG
In Support of Re-Opening Import of Sport-Hunted Elephant Trophies from Zimbabwe

Date	Producer	Document
4/20/2016	CF	M. Pieters Blog Posts
4/20/2016	CF	Pro Safaris Report
4/20/2016	CF	B. du Preez, Bubye Valley Conservancy Lion Research Report
4/20/2016	CF	R. Groom, Hunting in Zimbabwe's Save Valley Conservancy
4/20/2016	CF	B. du Preez et al., Sport-Hunting and Lion (*Panthera leo*) Conservation in Zimbabwe
4/25/2016	CF	Email to T. Van Norman attaching article "Muchinguri speaks on Tsholotsho Jumbo ban"
5/2/2016	CF	Email to T. Van Norman attaching article on continued losses in Zimbabwe's hunting sector due to the FWS suspension
5/9/2016	CF	Email to T. Van Norman including link to video describing Charlton McCallum Safaris/DAPU's anti-poaching successes
5/9/2016	ZPWMA	Email to T. Van Norman attaching letter explaining use of elephant hunting funds
5/22/2016	CF	Email to T. Van Norman attaching press release for Houston Safari Club grant to the Tashinga Initiative
5/23/2016	CF	Email to T. Van Norman forwarding DAPU's First Quarter Report
7/18/2016	CF	Email to T. Van Norman forwarding email from D. Cumming confirming "go-ahead" to prepare Supplemental Plan
7/19/2016	CF	Email to T. Van Norman forwarding Mana Pools MIKES site information
9/19/2016	CF	Email to T. Van Norman forwarding article about CAMPFIRE review
9/2016	AfESG	AfESG African Elephant Status Report 2016
11/9/2016	ZPWMA	Email to T. Van Norman attaching requested Plan prioritization and Supplemental Plan
11/14/2016	CF	Email to T. Van Norman forwarding article describing anti-poaching efforts by the Tashinga Initiative in the Zambezi Valley
12/27/2016	CF	Email to T. Van Norman forwarding presentation by ZPWMA Elephant Coordinator
1/18/2017	CF	Email to T. Van Norman forwarding DAPU End-of-Year Report
2/1/2017	CF	Email forwarding anti-poaching report reflecting implementation of the Mana Pools/Zambezi Valley regional elephant management plan
3/6/2017	CF	Email forwarding status of Zimbabwe responses to FWS requests
4/6/2017	CF	CAMPFIRE Association, The Role of Trophy Hunting of Elephant in Support of the Zimbabwe CAMPFIRE Program
4/6/2017	CF	CITES/MIKE, Levels and Trends of Illegal Killing of Elephants in Africa to 31 December 2016

Note: This list is not and is not intended to be a complete record of the FWS' Zimbabwe elephant file. The FWS undoubtedly received information not listed here, including at least two information productions by Safari Club International. We believe that the FWS has received direct communications from applicants for import permits, safari hunting operators, ZPWMA, and others.

United States Department of the Interior

FISH AND WILDLIFE SERVICE
Washington, D.C. 20240

FEB 2 3 2017

In Reply Refer To:
FWS/AIA/DMA/PRT– 04205C

Mr. Michael (b) Jines
(b) (6) (6)
Kingwood, Texas (b) (6)

Dear Mr. Jines:

This letter responds to your August 4, 2016, application to import under the U.S. Endangered Species Act (Act), a personal sport-hunted African elephant (*Loxodonta africana*) trophy taken in Zimbabwe during the 2015 hunting season. After careful review of your request for a permit, and after reviewing all available data and information on activities and circumstances occurring in Zimbabwe at the time you conducted your hunt, your application is being denied for the reasons outlined below.

The African elephant is listed as threatened under the Act with a special rule under Section 4(d) of the Act[1], which is set forth in regulations found at 50 CFR 17.40 (e)[2]. Under the special rule, issuance of an import permit can only occur if the U.S. Fish and Wildlife Service (Service) finds that the killing of the trophy animal intended for import would enhance the survival of the species [50 CFR 17.40(e)(6)(i)(B)]. and the trophy is accompanied by a threatened species permit issued under 50 CFR 17.32[3]. To enhance the survival of the species, the importation must be associated with activities that provide a direct or indirect benefit to the species in the wild. In evaluating whether the killing of the trophy animal intended for import into the United States contributes to the enhancement of African elephant populations within a given country, the Service looks at a number of factors. Such factors may include: current elephant population estimates in a given country, whether said county has a valid national and/or regional management plan, is the plan currently being implemented and does it contain achievable and measurable objectives, does the plan take an adaptive management approach and how often is it reviewed and/or updated, the designated authorities responsible for overseeing elephant management and how they are funded, the level of human-wildlife conflict taking place and how it is being addressed, any anti-poaching efforts undertaken, habitat conservation measures currently in place, as well as the amount of revenue generated by elephant hunting and how it is utilized in supporting conservation projects and/or managing the species.

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1 The text of this Act can be found by using the search bar at the top of the following web page: http://Go.USA.Gov/xr6dd.
2 The text of this regulation can be found by using the search bar at the top of the following web page: http://Go.USA.Gov/xr6m3.
3 Ibis

The best available scientific and management data, as well as information provided to the Service by Zimbabwe Parks & Wildlife Management Authority (ZPWMA), Conservation Force, and Safari Club International, was used in our evaluation. In evaluating the available data and information on elephant hunting in Zimbabwe at the time your hunt occurred, the Service was unable to determine that the killing of African elephants in Zimbabwe, whose trophies are intended for importation into the United States, would enhance the survival of the species. Therefore, the import of sport-hunted elephant trophies taken in Zimbabwe during the 2015 hunting season cannot be authorized. A copy of the Division of Management Authority's finding for the 2015 hunting season is enclosed for your reference.

As provided in 50 CFR 13.29(a)[4], you may request reconsideration of our decision to deny your application. Such a request must be in writing with the original signature of the person requesting reconsideration or by that person's legal representative, must contain a certification statement as provided at 50 CFR 13.12(a)(5)[5], should refer to your file number, PRT–04205C, and must be received in this office within 45 days of the date of this letter. The reconsideration of the decision to deny your request will be based on the information you provided in your original application. As such, your letter requesting reconsideration must address how our decision to deny your application was based on a misinterpretation of the information provided in your application or information available to the Service when making the original denial or it must present clarification of this information. **Should you supply new information that changes the scope of your original application, a new application will need to be submitted to this office before such information can be considered.**

If you have any questions, please contact Supervisory Policy Specialist Michael S. Moore of this office: Division of Management Authority, Branch or Permits, MS:IA, 5275 Leesburg Pike, Falls Church, VA 22041-3803 (703-358-2104, ext. 1983).

Sincerely,

Timothy J. Van Norman, Chief
Branch of Permits
Division of Management Authority

Enclosure

4 The text of this regulation can be found by using the search bar at the top of the following web page: http://Go.USA.Gov/xYDUk
5 Ibis

United States Department of the Interior

FISH AND WILDLIFE SERVICE

International Affairs
5275 Leesburg Pike, MS: IA
Falls Church, VA 22041-3803

In Reply Refer To:
FWS/AIA/DMA/PRT– 04205C

MAY 16 2017

Mr. Michael (b) (6) Jines
(b) (6)
Kingwood, Texas (b) (6)

Dear Mr. Jines:

This letter responds to your April 6, 2017, letter from your representative, John J. Jackson, III, requesting reconsideration of the February 23, 2017, decision to deny your application for a permit to import a personal sport-hunted African elephant (*Loxodonta africana*) trophy taken on February 25, 2015, in Zimbabwe. After a thorough review of Mr. Jackson's response on your behalf, it is my decision to uphold the original denial of your application.

As you know, the African elephant is listed as threatened with a special rule under Section 4(d) of the U.S. Endangered Species Act (Act)[1]. Under the special rule, issuance of an import permit for a sport-hunted trophy can only occur if the U.S. Fish and Wildlife Service (Service) finds that the killing of the trophy animal would enhance the survival of the species, and the trophy is accompanied by a threatened species permit. To enhance the survival of the species, the importation must be associated with activities that provide a direct or indirect benefit to the species in the wild.

At the time you originally applied for a permit, the Service had reviewed the best available scientific and management data, including information made available to the Service by Zimbabwe Parks & Wildlife Management Authority (ZPWMA), Conservation Force, and Safari Club International, in evaluating the status of Zimbabwe's elephant management program at the time you conducted your hunt. Based on this material, the Division of Management Authority (DMA) made a finding on March 26, 2015, that we were unable to find that the import of an elephant trophy taken during the 2015 hunting season would meet the requirements of the Act and the special rule for African elephant. Mr. Jackson's April 6, 2017, letter asked that the Service reconsider your application, in part, based on his assertion that the enhancement finding failed to consider significant information submitted by Conservation Force, ZPWMA, and others, both before and after the finding was made, that would lead to a reversal of the Service's negative finding.

Regarding Mr. Jackson's assertion that the Service failed to consider significant information submitted by Conservation Force and ZPWMA when making its determination, the Service has taken into consideration all of the information available to the Service regarding elephant hunting

1 The text of this Act can be found by using the search bar at the top of the following web page: http://Go.USA.Gov/xr6dd.

in Zimbabwe at the time your hunt occurred (February 25, 2015). While Mr. Jackson's request for reconsideration included additional information that was not available to the Service at the time the March 26, 2015, finding was made, most of the new information documented activities and actions that occurred after the conclusion of your hunt. While this new information may be relevant to hunts that occurred after our March 26, 2015 finding, it does not demonstrate that the situation in Zimbabwe, at the time of your hunt, was different than previously considered by the Service and would result in a revision of the March 2015 finding. Therefore, I am upholding the original denial of your application.

As provided in 50 CFR 13.29(e)[2], you may appeal to the Director of the Fish and Wildlife Service, through this office: Division of Management Authority, Branch of Permits, MS: IA, 5275 Leesburg Pike, Falls Church, Virginia 22041-3803. This appeal must be in writing with the original signature of the person requesting an appeal or of that person's legal representative, should refer to your file number, PRT-04205C, and must be submitted to this office within 45 calendar days of the date of this letter. The appeal must state the reason(s) and issue(s) upon which the appeal is based. Your written appeal must address how the decision to deny the reconsideration of your request was based on a misinterpretation of the information provided in your request for reconsideration, or it must present a clarification of this information. **Should you supply new information that changes the content of your original request for reconsideration, you must submit a new application to this office before such information can be considered.**

If you have any questions, please contact Supervisory Policy Specialist Michael S. Moore of this office: Division of Management Authority, Branch or Permits, MS:IA, 5275 Leesburg Pike, Falls Church, VA 22041-3803 (703-358-2104, ext. 1983).

Sincerely,

Craig Hoover, Chief
Division of Management Authority

2 The text of this regulation can be found by using the search bar at the top of the following web page: http://Go.USA.Gov/xYDUk

APPEAL TO THE DIRECTOR

Appeal of the Denial of the Applicants'

Request for Reconsideration and

Request for Oral Argument

PRT-04846C and PRT-04205C

CONSERVATION FORCE

† BARON BERTRAND DES CLERS, PH.D.
† JAMES G. TEER, PH.D.
† BART O'GARA, PH.D.
† DON LINDSAY
† BERT KLINEBURGER

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June 27, 2017

Acting Director Greg Sheehan
U.S. Fish and Wildlife Service
1849 C Street N.W.
Washington, D.C. 20240

BY EMAIL AND FEDERAL EXPRESS

RE: Appeal of the Denials of PRT-04846C and PRT-04205C and Request for Oral Argument

Dear Director Sheehan:

We respectfully request reversal of the Division of Management Authority's denials of two trophy import permit applications. The first application, PRT-04846C, requested a permit to import an elephant hunting trophy lawfully taken in the Ngamo/Sikumi Forest Block in Zimbabwe on March 21, 2015. The second, PRT-04205C, requested a permit to import an elephant hunting trophy lawfully taken in the Mbire CAMPFIRE District in Zimbabwe on February 25, 2015. Conservation Force represents both applicants as a pro bono, public legal service. Both hunts generated revenue and conservation incentives to enhance the survival of Zimbabwe's elephant. However, both trophy import applications were denied in February 2017.

On April 6, 2017, we submitted a request for reconsideration of these denials, which was also denied in a letter dated May 16, 2017. This second denial relies on a negative enhancement finding made by the DMA on March 26, 2015 (the "Finding"). We turn to you for a final appeal on behalf of the applicants and the well-managed and beneficial hunting system in Zimbabwe, which has the world's second-largest elephant population.

These applications should be approved. The over-three-year suspension of elephant trophy imports from Zimbabwe should be lifted, for three primary reasons. First, it is based on errors and misinterpretation of facts. The DMA suspended imports without notifying or consulting Zimbabwe. Given the lack of contact with Zimbabwe, it is hardly surprising the three negative enhancement findings made in 2014 and 2015[1] are full of mistakes. When these mistakes were corrected by Zimbabwe's wildlife management authority, Conservation Force, and others, the DMA failed to make the changes, raised new "issues," and complained about not receiving information for which it had never asked. But this feint does not change the fact the reasons given for suspending elephant trophy imports from Zimbabwe did not and do not exist.

Second, the regulatory "enhancement" requirement has been satisfied several times over. The benefits of lawful elephant hunting in Zimbabwe were proven in the thousands of pages submitted to the DMA by

[1] Chief, Branch of Permits, *Enhancement Finding for African Elephants Taken as Sport-Hunted Trophies in Zimbabwe during 2014* (Apr. 17, 2014) ("*April Finding*"); Chief, Branch of Permits, *Enhancement Finding for African Elephants Taken as Sport-Hunted Trophies in Zimbabwe during 2014* (July 22, 2014) ("*July Finding*"); Chief, Branch of Permits, *Enhancement Finding for African Elephants Taken as Sport-Hunted Trophies in Zimbabwe on or after January 1, 2015* (Mar. 26, 2015) ("*Finding*").

the Zimbabwe Parks and Wildlife Management Authority ("ZPWMA"), Conservation Force, tourist hunting operators, and others. This information demonstrates tourist hunting revenues justify habitat protection, fund most elephant management and anti-poaching, and increase community tolerance of elephant and other game. The continued suspension of trophy imports obstructs all this. It blocks resources ZPWMA needs to successfully manage the country's 83,000+ elephant. The DMA has redefined "enhancement," and set ZPWMA up to fail the new test by cutting off the support on which ZPWMA relies. This is a "Catch-22" situation.

Third, denial of the applicants' request for reconsideration is arbitrary, capricious, and contradictory. The Finding's mistakes should be updated and corrected. The Finding itself requires this—it promises, at least four times, that the DMA will consider additional information when provided and re-evaluate its negative conclusion.[2] The DMA received such information in July 2015 in response to a May questionnaire sent by the Director of International Affairs almost two months after the Finding was made. Yet, the Finding has not been updated or revised. The denial of the request for reconsideration is wrong. It cannot be based on the best information because the Finding and this denial fail to consider the most up-to-date, complete data requested and received by the DMA.

Therefore, we respectfully appeal the DMA's errors to you, and request oral argument on the appeal.

I. THE SUSPENSION OF ELEPHANT TROPHY IMPORTS FROM ZIMBABWE IS BASED ON ERRONEOUS INFORMATION AND MISINTERPRETATION OF FACT AND HAS BEEN FROM THE VERY BEGINNING

The suspension has been improper from the start. The DMA's negative April Finding cited a "lack of recent data on what is occurring in Zimbabwe" as the "most significant aspect of our analysis."[3] But an asserted lack of data does not justify the suspension because it was due entirely to the DMA's failure to ask. The April Finding admits that prior to the suspension, the DMA had not reached out to ZPWMA in writing since 2007, and ZPWMA provided the requested information at that time. The DMA also met with Zimbabwean representatives "at various times in the past 6 years," but does not claim to have expressed concern about a lack of data during those meetings.[4] To our knowledge, there is no record of a 2007 information request, or any other written request until April 4, 2014.[5]

Rather than consulting with Zimbabwe as recommended by CITES Res. Conf. 11.3, or "provid[ing] … specific actions that can be taken by Zimbabwe … that might allow the Service to reconsider its findings" and "early engagement with the sport-hunting community to maintain positive relations and create opportunity for

[2] E.g., *Finding*, p. 1 & 3 ("The suspension on importation of trophies taken during calendar year 2015 or future hunting seasons could be lifted if additional information on the status and management of elephants in Zimbabwe becomes available…"), p. 6, 11 ("the Service can re-evaluate this finding, and the suspension on importation of trophies taken during calendar year 2015 or future hunting seasons could be lifted, if additional information on the status and management of elephants in Zimbabwe becomes available…").

[3] *April Finding*, p. 6.

[4] *April Finding*, p. 1, 2, 6; *July Finding*, p. 3.

[5] Conservation Force obtained documents in response to a Freedom of Information Act ("FOIA") request for the basis of the April 2014 suspension. That production included the April 4, 2014 questionnaire to ZPWMA, but no others.

cooperative action to affect [*sic*] change," as suggested in an internal memorandum,[6] the DMA suspended the import of elephant trophies without warning. The DMA's failure to engage Zimbabwe or the hunting community, and the resultant errors and omissions in the Findings, are so flagrant as to seem intentional. This conduct suggests an unpublished policy against regulated tourist hunting as a conservation tool.

For example, despite identifying a lack of data as the primary basis for suspending imports, the DMA did not request updated information from Zimbabwe until April 4, 2014—the same day it publicly announced the suspension in a press release.[7] ZPWMA was blindsided and its reaction was immediate. Its Director-General objected in a letter dated April 14 and sent a 32-page response to the questionnaire on April 17, 2014.[8] The Director-General took the initiative to explain the response, answer questions, and meet with FWS representatives in person in D.C.[9] (Note that ZPWMA was equally responsive to the FWS' October 31, 2014 and May 12, 2015 information requests.)[10]

But likely due to the failure to consult ZPWMA and reliance instead upon uninformed, biased sources, each negative enhancement finding has contained numerous errors.[11] And though the DMA received updated, best-available information and corrections, it has barely adjusted its findings and maintained much of the same language—and the same negative conclusion.

The import suspension was based initially on an inexplicable misunderstanding of Zimbabwe's elephant population status and poaching level. According to the April Finding, the IUCN African Elephant Specialist Group's ("AfESG") database showed Zimbabwe's elephant population "had been reduced" from 84,416 in 2007 to 47,366 in 2012; ZPWMA failed to properly monitor or manage these elephant; and a "2013 CITES Panel of Experts" identified weaknesses in ZPWMA's management, funding, and infrastructure. The April Finding also claimed "over 300" elephant were poisoned in Hwange National Park in 2013, and "anecdotal

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[6] CITES Conf. Res. 11.3; Conf. Res. 6.7 (recommending that parties intending to take stricter domestic measures first notify and consult with affected range states); B. Arroyo, *Information Memorandum for the Director* (Jan. 8, 2014), p. 2.

[7] *FWS FOIA Production*, p. 747-51 (T. Van Norman, Letter to E. Chidziya, Director-General of ZPWMA (Apr. 4, 2014)).

[8] ZPWMA, *Response to Questions Raised by the U.S. FWS to Address the USA Endangered Species Act* (Apr. 17, 2017) ("*ZPWMA Apr. 2014 Response*").

[9] Conservation Force, *Comment Opposing the Negative Enhancement Finding for African Elephant Taken as Sport-Hunted Trophies in Zimbabwe in 2014* (Oct. 16, 2014), p. 5 & attachments ("*CF Oct. 2014 Comment*").

[10] E.g., Conservation Force, *Request for Reconsideration of Denial of Permit Applications PRT-04846C and PRT-04205C* (Apr. 6, 207), p. 2-3, 8-10, 13-14 ("*Request for Reconsideration*") ("ZPWMA responded to the first questionnaire within two weeks … ZPWMA responded to the second questionnaire in under six weeks; responded to third—not considered in the Finding—in five weeks; responded to the fourth—not considered in the Finding—in two weeks; and responded to the fifth —not considered in the Finding—within several weeks, with the final plan prioritization completed within six months."); ZPWMA, *Response to the USFWS* (July 2015) ("*ZPWMA July 2015 Response*"); ZPWMA, *Response to the USFWS* (Dec. 10, 2014) ("*ZPWMA Dec. 2014 Response*").

[11] The FOIA production revealed largely dated articles in the record, FWS employees who recommended "unilaterally stop[ping] issuing any permits for any trophies from Zimbabwe immediately," without consulting ZPWMA, and the immediate refutation of the news reports by WWF. One of the most-cited sources in these articles, Johnny Rodrigues of the Zimbabwe Conservation Task Force ("ZCTF"), was shown to have alleged "twisted" and incorrect information, and was unknown to WWF or the Chair of the National Task Force on Poaching and Habitat Loss. See, e.g., *FWS FOIA Production*, p. 162, 176-78.

evidence" indicated that Zimbabwe's elephant population was "under siege."[12] These were all reasons to justify the suspension in the April Finding. And none of these were based in fact. They were factual errors, copied language from the positive, 1997 enhancement finding, or fabrications from anti-hunting sources the FWS knew already to be unreliable.

ZPWMA and Conservation Force submitted extensive information to correct these DMA mistakes. Among other things, we explained how the DMA misinterpreted the AfESG database's data categories to reflect a "reduction."[13] Even the AfESG corrected the DMA's misunderstanding.[14] We also submitted seven surveys dating from the past ten years, including a 2007 aerial estimate of North West Matabeleland/Hwange to correct the April Finding's incorrect opinion that ZPWMA did not monitor the elephant population.[15] The surveys covered over three-fourths of Zimbabwe's estimated elephant range, and were available through a website link to "new" surveys which the DMA apparently did not choose to click.[16]

This information provided showed that ~105 elephants were poisoned in Hwange, not 300, largely due to the quick intervention of ZPWMA rangers and the erly warning and assistance of the neighboring hunting

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[12] *April Finding*, p. 3-6; FWS Division of Public Affairs, *Service Suspends Import of Elephant Trophies from Tanzania and Zimbabwe* (Apr. 4, 2014) ("*Press Release*") ("Anecdotal evidence, such as the widely publicized poisoning last year of 300 elephants in Hwange National Park, suggests that Zimbabwe's elephants are also under siege.").

[13] As we previously explained, "The enhancement finding badly misunderstands the currentness and completeness of the AfESG's '2013 Africa' analysis. That data is updated only through a point in 2012 [as stated in the database], and only to the extent the under-funded volunteers of AfESG are able to review and incorporate 'new' surveys. The AfESG working group's pace is not always consistent or speedy due to funding constraints [discussed by the Chair in a document we attached from the Sixty-Fifth Meeting of the CITES Standing Committee]. Accordingly, there are '251 new surveys' advertised on the main page of the Database (which FWS should have visited to get to the '2013 Africa' report). These surveys 'have not yet been reviewed by the appropriate Data Review Working Group' [page attached] and are not reflected in the database tables. Had FWS clicked the link … it would have counted seven from Zimbabwe on the list. Of the seven, five were completed before 2012. (In fact, 221 of the 246 'new' surveys were conducted prior to 2013 and 185 were conducted prior to 2012, making most of the surveys on this list not very 'new.') Shouldn't FWS be sophisticated enough to understand the database's limitations?" *CF Oct. 2014 Comment*, p. 10-11.

[14] Zimbabwe requested the AfESG comment on the April and July Findings, which was done by email dated May 30, 2014 and a comprehensive letter dated November 3, 2014. The Chair wrote that the July Finding relied on a "serious oversight" in the database—the failure to include the 2007 survey of NW Matabeleland in the country total, although "this survey was listed in the 'New Surveys' portion of the AED website (http://www.elephantdatabase.org/population_submissions/154)." The Chair pointed out "four other instances in which the use of data from the AED presented within the finding's 'Population Status' section demonstrated oversights or misinterpretations as well as a fifth instance meriting clarification." These included: five surveys conducted between 2006-2010 estimated higher populations, contradicting the July Finding's statement that 2006-2010 surveys indicated "a substantial decline in the population"; even if "double-counting" occurred during the Save Valley Conservancy survey the population would still have increased, contradicting the July Finding's criticism; the statement about "a carcass ratio of less than 4%" "suggests a conflation of carcass ratios from aerial surveys and mortality rates," and "4% seems a reasonable figure"; and "sample counts are not inferior to total counts," contradicting the finding's suggestion and "betray[ing] a likely misunderstanding of the relative value of sample v. total counts," among other corrections. *AfESG Letter*, p. 1-4.

[15] Conservation Force, *Comment Opposing the Interim Suspension of Imports of Elephant Trophies from Zimbabwe* (June 6, 2014), p. 4-7 & attachments ("*CF June 2014 Comment*"). We also provided evidence of the monitoring which supplement periodic aerial surveys, including water hole game counts, road strip and walking transects, and ranger-based monitoring. E.g., *ZPWMA Apr. 2014 Response*, p. 6; *CF June 2014 Comment*, p. 4 & attachments; *CF Oct. 2014 Comment*, p. 10-12 & attachments.

[16] *CF Oct. 2014 Comment*, p. 11 & attachments (including website print); *ZPWMA Apr. 2014 Response*, p. 5; *AfESG Letter*, p. 1-2.

operator (an act of enhancement as discussed below). The poachers received deterrent 15-year sentences. In response, ZPWMA initiated a "private sector driven fund raising initiative" and "massive [ranger] recruitment drive" and increased criminal penalties for wildlife poisoning. Moreover, ZPWMA's data indicated poaching was lower in Zimbabwe than most other African countries. Zimbabwe's elephant were not "under siege," but generally stable or increasing.[17]

Moreover, the information proved that the "2013 CITES Panel of Experts" did not exist, and certainly did not query ZPWMA's dedicated elephant management. The 1997 enhancement finding—which approved trophy imports—included almost verbatim language. It seems this language was retained, and somehow edited to "2013," without any fact-checking by the author.[18] These avoidable, perhaps intentional, errors undercut the April Finding's negative conclusion. The DMA's express concerns did not and do not exist.

But instead of admitting its mistakes, the July Finding compounded them. It continued to claim Zimbabwe was suffering from a poaching crisis, lacked updated surveys, and was criticized by a "2002 CITES Panel of Experts." It relied upon outdated CITES/ETIS reports, incorrectly insisted a historical review of elephant management actions was Zimbabwe's elephant management plan, ignored four pages of explanation on quota-setting, and ignored a data-rich report from the CAMPFIRE Association. The "updated" July Finding did little more than entrench the prior finding's errors and omissions.[19]

Once again, Conservation Force tried to rectify these mistakes in a 34-page, substantive comment with 58 attachments. The comment painstakingly went through and fact-checked each section of the July Finding and pointed to information that had been ignored.[20] We emphasized the on-going update to Zimbabwe's

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[17] *ZPWMA Apr. 2014 Response*, p. 5-13; *CF June 2014 Comment*, p. 3-8 & attachments; *CF Oct. 2014 Comment*, p. 18 & attachments; G. Wittmyer et al., *Illegal Killing for Ivory Drives Global Decline in African Elephants*, Proceedings of the National Academy of Sciences (July 22, 2014). Reduced poaching in Zimbabwe was reflected in the Proportion of Illegally Killed Elephant ("PIKE") after 2012. In copying-and-pasting from the April Finding, the July Finding incorrectly stated that 2013 PIKE data was unavailable. But it was, as pointed out by the AfESG and Conservation Force. *AfESG Letter*, p. 4; *CF Oct. 2014 Comment*, p. 21-22 & attachments. Updated 2013 PIKE showed the illegal killing of elephant fell to 0.4 at the Chewore site and 0.22 at the NyamiNyami site, below the "unsustainable" level. CITES Secretariat, SC65 Doc. 42.1 & Inf. 42.1 (data reflected a "statistically significant" decline in poaching); *AfESG Letter*, p. 4-5; see also *ZPWMA July 2015 Response*, p. 25 (providing PIKE 2000-2014).

ZPWMA's July 2015 Response (p. 24-31) reports on "Urgent Measures" undertaken to bring about this reduction; see also *ZPWMA Dec. 2014 Response*, p. 13-14.

[18] *CF June 2014 Comment*, p. 14; compare *April Finding*, p. 3-4, with Chief, Branch of Permits, Enhancement Finding for African Elephants Taken Sport-Hunted Trophies in Zimbabwe (July 2, 1997), p. 3 ("*1997 Finding*").

[19] E.g., *July Finding*, p. 5 (failing to address pledge to update elephant management plan), p. 6 (misinterpreting AfESG database with almost verbatim language to April Finding), p. 6 (dismissing Save Valley Conservancy survey as "partial" and with "double counting"), p. 6-7 (misconstruing carcass ratio in Gonarezhou NP survey), p. 7 (claiming 2012 and 2013 PIKE unavailable), p. 7 (claiming to lack data on ZPWMA's funding), p. 7 (citing "2002 CITES Panel of Experts"), p. 8 (relying upon ivory seizure reports), p. 9 (complaining to lack offtakes figures), p. 10 (conflating human-elephant conflict with PAC offtake), p. 10 (raising a red herring of the CITES approved trade in hides), p. 10-11 (dictating what factors ZPWMA must consider in quota-setting), p. 11-12 (failing to discuss the CAMPFIRE Association Report).

[20] E.g., *CF Oct. 2014 Comment*, p. 8, 15-16 (explaining how *Elephant Management in Zimbabwe* was not a management plan and quote referred to maintaining trophy quality, not sustainability), p. 10-11 (correcting misinterpretation of AfESG database and existence of "new surveys"), p. 11-12 (noting additional surveys provided which refuted claims that "very few new surveys" had been conducted, Hwange had not been surveyed, and surveys showed downward trend), p. 13 (demonstrating that SVC survey was comparable to prior and "double-counting," if it even occurred, had minimal effect), p. 13-14 (correcting misreading of GNP survey report and omission of sentence in quote), p. 16-17

elephant management action plan that was largely omitted in the July Finding (although the DMA was kept informed of the process) and the 2014 aerial survey being planned with Zimbabwe's transfrontier partners to be comparable with past surveys, among (many) other things.[21]

However, the Finding still does not adequately consider these corrections and submitted data. As detailed in the Request for Reconsideration, the Finding repeatedly copies-and-pastes from the July Finding. (At least half the substantive paragraphs contain similar, sometimes verbatim language to the July Finding). The Finding fails to incorporate significant information submitted by ZPWMA or Conservation Force. Some of the errors made are fundamental.

For example, as in July, the Finding does not consider four of the seven recent elephant surveys provided, and cherry-picked from the two surveys it cited (and was corrected by the AfESG).[22] As in July, the Finding purportedly quotes from a "CITES Panel of Experts" that did not exist.[23] As in July, the Finding dismisses what it labels as "bright spots of conservation" as being "not enough," and criticizes Zimbabwe's lack of a "government mechanism" to encourage conservation. But Zimbabwe was the first African country to give "Appropriate Authority" to local communal land holders to manage and benefit from wildlife on their land. That authority is <u>exactly</u> the mechanism which incentivizes the existence of populations of elephant, lion, leopard, and other dangerous game that otherwise would not exist (see p. 11 below).[24] At the turn of the twentieth century, the elephant population in Zimbabwe was estimated to be fewer than 5,000. Now, thanks in part to the "bright spots" of hunter conservation and largely to the devolution of management authority, elephant populations are stable or increasing.[25] They are also sustainably hunted, as explained

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(explaining why 2014 national survey did not require cameras and comparability was main goal), p. 20-21 (proving "2002" CITES Panel of Experts did not exist), p. 21-22 (providing 2012 and 2013 PIKE data (which had been available in July)), p. 22 (explaining that ETIS data is "confounded" by some CITES-authorized, lawful trade in ivory in Zimbabwe that is subject to seizure abroad), p. 25-26 (justifying quota-setting process), p. 26-28 (noting omission of CAMPFIRE Association Report data), Appendix I (quoting April 4 inquiry and claimed lack of data to demonstrate that data was not requested).

[21] *CF Oct. 2014 Comment*, p. 9, 16-17, & attachments; *AfESG Letter*, p. 4-5. Please note that the DMA received the report of the national Elephant Management Plan Workshop in December 2014, and was sent invitations, agendas, and proceedings of the regional elephant management planning workshops as these were issued.

[22] *AfESG Letter*, p. 2-5 (correcting errors with paragraphs on Save Valley Conservancy and Gonarezhou surveys); CF Oct. 2014 Comment, p. 10-14.

[23] The Finding cannot possibly quote the Panel of Experts' report, which was clearly not reviewed, because the author still cannot get the correct date for the Panel after three tries. The author first chose 2013, then cut off a decade in the July Finding. Perhaps he or she considered 1997 to be a safe bet because Zimbabwe's elephant population was down-listed from Appendix I to Appendix II of CITES in 1997. However, that down-listing was in the works for several CoPs, and Zimbabwe's elephant status and management were reviewed by the CITES Panel of Experts in 1992. CITES Res. Conf. 7.9; Zimbabwe, *Consideration of Proposals for Amendment of Appendices I and II* (Prop. 10.27); CITES Panel of Experts, *Review of the Proposals Submitted by Botswana, Namibia, and Zimbabwe to Transfer Their National Populations of Loxodonta africana* (1992). Please note that even if the Finding intends to cite this Panel, their report is <u>twenty-five years old</u>.

[24] *CF Oct. 2014 Comment*, p. 27-30; *Request for Reconsideration*, p. 16-18. The Finding (p. 10) criticizes ZPWMA due to the commitment of hunting operators to provide enhancement. That should not be a criticism. It is a <u>benefit</u> to the elephant and other species. It represents the devolution of anti-poaching and community support obligations to the private sector, relieving some of the financial burden on ZPWMA. Accord *ZPWMA Apr. 2014 Response*, p. 14-16, 27-28; *ZPWMA Dec. 2014 Response*, p. 4, 17-20, 25-26; *ZPWMA July 2015 Response*, p. 14, 31-33.

[25] ZPWMA, *Zimbabwe National Elephant Management Plan (2015-2020)*, p. 3-11 ("*Plan*").

in three ZPWMA Responses and the non-detriment determination.[26] The participatory, locally allocated quotas represent a fraction (0.37% in 2014 and 0.49% in 2016) of the elephant population, and offtakes are even lower—0.23% on average (2010-2015).[27]

Rather than accepting the evidence of enhancement and sustainability, the Finding, as in July, twists facts, ignores relevant data, claims not to have information, and does everything it can to justify the negative conclusion in light of everything that points to a positive finding of enhancement. The DMA then tacitly admitted it had not requested information it claimed not to have when it sent a May 2015 questionnaire to ZPWMA.[28]

The concerns on which the trophy import suspension was based have been proven baseless. Zimbabwe's elephant management and tourist hunting system have been proven to benefit the species. If all of the submissions by ZPWMA, Conservation Force, and others are reviewed without a preconceived conclusion, then that best-available and most current information requires the suspension to be lifted. An unbiased and open-minded review is what we request by this appeal.

II. THE SUSPENSION OBSTRUCTS THE ENHANCEMENT GENERATED BY LAWFUL TOURIST HUNTING

During the last 38 months and counting, ZPWMA, Conservation Force, and others have provided far more than enough information to demonstrate that the "enhancement" standard is satisfied. Far more than in prior enhancement findings. This information reflects "activities that provide a direct or indirect benefit to the species in the wild."[29] Tourist hunting benefits elephant by creating incentives for habitat protection and expansion, operating funding for ZPWMA, funding for anti-poaching and "boots on the ground," rural community employment and investment, and much more. This is not an empty claim. It is borne out in the extensive documentation submitted.

A. Expansion and Protection of Habitat and Sustainable Funding

Tourist hunting enhances the survival of elephants in Zimbabwe by justifying protection of two-and-a-half times more habitat than in strictly-protected national parks. Although the ~28,000 km^2 in national parks contribute greatly to wildlife conservation, the parks are much smaller than the approximately 19,000 km^2 in safari areas, 40,000 km^2 in communal/CAMPFIRE areas, and over 7,100 km^2 in private conservancies.[30]

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[26] *ZPWMA Apr. 2014 Response*, p. 19-26; *ZPWMA Dec. 2014 Response*, p. 22-25; *ZPWMA July 2015 Response*, p. 43-48; ZPWMA, *Non-Detriment Finding for African Elephant in Zimbabwe* (May 16, 2014); *Request for Reconsideration*, p. 10-11.

[27] *ZPWMA July 2015 Response*, p. 43 (average offtake of <192 elephant per year), 44 (quota less than 300 in 2014), 46 (2016 quota).

[28] B. Arroyo, *Letter to Minister Kasukuwere* (May 12, 2015); .

[29] C. Hoover, *Letter to Applicant PRT-04846C* (May 16, 2017), p. 1 ¶ 2.

[30] IUCN, World Database on Protected Areas, publicly available at http://www.protectedplanet.net; CAMPFIRE Assn., *Trophy Imports Suspension and the CAMPFIRE Program* (2014), p. 1-2 ("*CAMPFIRE Association Report*"); *Request for Reconsideration*, p. 17 (citing B. du Preez et al., *Sport-Hunting and Lion (Panthera leo) Conservation in Zimbabwe* (Jan. 31, 2016); B. du Preez, *Bubye Valley Conservancy Lion Research Report* (Jan. 12, 2016) ("*BVC Report*"); R. Groom, *Hunting in Zimbabwe's Save Valley Conservancy* (Jan. 27, 2013).

Note, this estimate does not include all communal areas, but only nine significant hunting areas. It does not include all conservancies (most specifically, the 1,400 km^2 Nuanetsi area or the Gwayi Valley). And it does not include the

The revenue from lawful hunting sustains this expanded habitat. It is obviously an incentive in safari areas, but also in CAMPFIRE areas (prior to the suspension), hunting generated ~90% of all revenue, and elephant hunting generated three-quarters of this total.[31] In private conservancies such as Bubye and Savé Valley, operations, anti-poaching, and community programs are exclusively supported by hunting income.[32]

Hunting revenue also provides most of the operating budget on which ZPWMA relies to secure this habitat and police the national parks.[33] Conservation fees charged to hunting clients and others, and hunting fees charged for concession leases, licenses, and trophies, are the primary source of ZPWMA's funds. Elephant hunting fees account for the largest percent of revenue generated across all user-pay land categories (e.g., safari areas, communal land, private conservancies, and forestry concessions). In 2014, over $6 million in trophy fee revenue derived from elephant hunts. Approximately $5 million accrued to ZPWMA and was "ploughed back into conservation," law enforcement, and management.[34] Over 50% of the revenue had come from U.S. hunters prior to the suspension.[35]

According to ZPWMA's Elephant Coordinator: "the African elephant is one of the biggest drawcard species from a hunting perspective and is at the centre of all the major hunts … Generally hunting contributed an average of USD22m to the GDP in 2014 and 2015..."[36] Most of the revenue from elephant hunting is re-invested in and contributes to the recovery of the species by being used for law enforcement and anti-poaching.[37] Without this revenue, ZPWMA is hard-pressed to implement its state-of-the-art national and regional elephant management plans. The trophy import suspension reduced, and continues to reduce, this much-needed revenue.[38]

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forest reserves that allow sustainable hunting, such as those in the Matetsi/Kazuma Pan area. The habitat provided and protected in hunting areas is even larger than stated above.

[31] *CAMPFIRE Association Report*, p. 4; CAMPFIRE Assn., *CAMPFIRE Hunting Income and Distribution* (Dec. 1, 2015), p. 6 ("*CAMPFIRE Income Analysis*").

[32] Conservation Imperative, *Fate of the African Lion: Bubye Valley Conservancy* (sent to the DMA on Feb. 24, 2016).

[33] *ZPWMA Apr. 2014 Response*, p. 16, 25, 27; *ZPWMA Dec. 2014 Response*, p. 20-21; *ZPWMA July 2015 Response*, p. 48-53 & attachments; ZPWMA Email to DMA forwarding *Zimbabwe National Elephant Supplementary Management Plan (2015-2010)* (Nov. 9, 2016) ("*Plan Supplement*"); *CF Oct. 2014 Comment*, p. 30-31 & attachments.

[34] *ZPWMA Apr. 2014 Response*, p. 25; *CF June 2014 Comment*, p. 17 (CAMPFIRE revenue is also "ploughed back into wildlife conservation activities in CAMPFIRE areas. Proceeds are used directly for elephant conservation, provision of game water supplies, wildlife monitoring and anti-poaching programs on communal land").

[35] *ZPWMA July 2015 Response*, p. 40-41; *CAMPFIRE Association Report*, p. 4; *CAMPFIRE Income Analysis*, p. 6; ZPWMA, *Legal Trade, Conservation, and Rural Livelihoods: A Zimbabwean Perspective* (Dec. 2016), p. 19; SOAZ, *Status of Elephant Populations, Hunting, and Anti-Poaching Effort in Safari Areas in Zimbabwe* (2014), p. 3-4 ("*SOAZ Report*").

[36] ZPWMA, *Legal Trade, Conservation, and Rural Livelihoods* (Dec. 2016), p. 9-10.

[37] *ZPWMA July 2015 Response*, p. 36-41, 48-51; ZPWMA, *Legal Trade, Conservation, and Rural Livelihoods* (Dec. 2016), p. 9-10. Salaries and ranger equipment are the largest budget items, and most rangers are used for patrols that conduct monitoring and protection/enforcement. *ZPWMA July 2015 Response*, p. 34-36.

[38] See generally *Plan*; *Plan Supplement*, p. 6 ("One of the major challenges regarding implementation of the EMP is with regards to the adoption of stricter domestic measures by the United States of America. This has had the net effect of further reducing the revenue from hunting into the Authority, which therefore affects the budget allocated to resource protection, in particular the elephant in this case. One of the key impediments towards and full and comprehensive implementation of the Elephant Management Plan is limited resources."); CAMPFIRE Assn., *The Role of Trophy Hunting of Elephant in Support of the Zimbabwe CAMPFIRE Program* (Dec. 2016), p. 1, 22-25 ("*CAMPFIRE—Role of Hunting Report*"), publicly available at http://campfirezimbabwe.org/index.php/downloads.

B. Anti-Poaching and Encroachment

Lawful tourist safari hunting enhances the survival of elephant by being a key component of Zimbabwe's national anti-poaching strategy.[39] Hunting operators are often the first to observe poaching and the first line of defense against poachers because concessions frequently buffer national parks and international borders. The DMA was provided extensive documentation to evidence this enhancement, yet somehow misinterprets this evidence as a negative.

The Hwange National Park poisoning referenced in the April Finding and press release was first discovered by a hunting company's team of anti-poaching scouts. The scouts initially tracked the poachers, and the operator and team worked closely with ZPWMA rangers to minimize the damage.[40] This is a clear example of how hunting operators in the field[41] benefit elephant. Their presence adds to the capacity to police a park like Hwange, 1.6 times the size of Yellowstone National Park. Hunting operators' anti-poaching teams add a significant number of "boots on the ground." According to SOAZ, a sample of just fourteen operators invested almost $1 million in anti-poaching in 2013, including salaries for 245 scouts.[42] (The DMA received this data, but has never discussed or cited it in the Findings.)

Conservation Force submitted specific examples to further demonstrate the operators' commitments and contributions. One operator in an area bordering Mozambique "picked up over 5,000 snares and arrested over 60 poachers (in four years)," with an annual anti-poaching expenditure of $80,000 to $90,000. The scouts have grown so skilled in anti-poaching that they work with ZPWMA rangers to patrol Mana Pools National Park, in addition to patrolling the concession. The operator spent over $95,000 on anti-poaching activities in 2016 alone, and more in community payments (as discussed in the next section).[43]

Similarly, a hunting operator discovered the Hwange poisoning because the company's twelve-person anti-poaching team patrols the park's edge. This is an inherent benefit of tourist hunting. The company's anti-poaching and community programs exceeded $350,000 in 2014. Ninety-five percent of the company's revenue derived from elephant hunting prior to the trophy import suspension.[44]

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[39] *ZPWMA Apr. 2014 Response*, p. 26-28; *ZPWMA Dec. 2014 Response*, p. 17; *ZPWMA July 2015 Response*, p. 27, 33-34.

[40] *CF June 2014 Comment*, p. 4, 18-19 (attaching email and declaration from operator involved).

[41] The Finding, p. 10, misconstrues this as hunting clients ("armed hunters"). But our submissions have never claimed hunting **clients** contribute to anti-poaching. Rather, the extensive operator patrols protect the habitat and provide the key enhancement. E.g., *CF June 2014 Comment*, p. 4, 17-19 & attachments; CF Oct. 2014 Comment, p. 22, 27-33 & attachments; *Request for Reconsideration*, p. 12-13, 16-18 & attachments (e.g., examples of Charlton McCallum Safaris, Lodzi Hunters, Pro Safaris, Martin Pieters Safaris, etc.); *SOAZ Report*, p. 4.

[42] *SOAZ Report*, p. 4.

[43] Information for Charlton McCallum Safaris submitted in: *CF June 2014 Comment*, p. 16,18-19 & attachments; *CF Oct. 2014 Comment*, p. 27-30 & attachments; Conservation Force, *Supplementary Comment Opposing [July] Finding and Information Provided in Support of a Positive Enhancement Finding for 2015* (Dec. 15, 2014) p. 3-6 & attachments ("*CF Dec. 2014 Comment*"); CF, *Supporting Documentation for Comments Demonstrating Enhancement from Tourist Hunting in Zimbabwe* (Jan. 19, 2015), p. 1-4 & attachments ("*CF Jan. 2015 Comment*"); *Request for Reconsideration*, p. 12 (citing emails sent to the DMA attaching Charlton McCallum Safaris documents).

[44] Information for Lodzi Hunters: *CF Dec. 2014 Comment*, p. 3-6 & attachments; *CF Jan. 2015 Comment*, p. 1-4 & attachments; *Request for Reconsideration*, p. 13 & attachments.

Another hunting operator along the Zambian border invests over six percent of turnover in a ten-member anti-poaching team, and coordinates with ZPWMA rangers to police the over 500 km^2 concession (a little smaller than Zion National Park).[45] In 2013-2014, anti-poaching teams in the Omay communal area (which forms a corridor with several safari areas and national parks) conducted 289 patrols, recovered 165 snares, and arrested 123 poachers.[46]

The revenue from tourist hunting, and especially elephant hunting, underwrites anti-poaching programs throughout Zimbabwe. In the national parks, hunting operators work with and support ZPWMA rangers.[47] Their contributions do not "raise … concerns about the effectiveness of funds utilization" by ZPWMA,[48] but benefit the elephant and other wildlife by sharing law enforcement costs with the private sector, reducing the government burden. This is a customary and widely-recognized "enhancement" of regulated hunting in Zimbabwe and throughout Southern and Eastern Africa. As we previously explained:

> The examples … are not just "bright spots," as dismissed in the [July] finding … they form a steady beam of light that shines on Zimbabwe's elephant. These examples represent a consistent commitment throughout the safari community in Zimbabwe, and a shared goal of ensuring the conservation of elephant and other wildlife. That is … enhancement.[49]

And that enhancement is being reduced and threatened by the denial of these import permits.

C. CAMPFIRE/Reduction of Human-Elephant Conflicts

Zimbabwe was the first African country to devolve control over natural resources to the local communities living on that land. CAMPFIRE's innovation was to give communities a proprietary interest in the resource, including wildlife.[50] CAMPFIRE communities rely upon lawful tourist hunting to generate revenues, which are used for building schools and clinics, improving water supplies, paying school fees or pensions, shoring up food supplies, and more.[51] Benefits for rural communities are multiplied in jobs, gratuities, game meat, and other financial opportunities much valued in a country with high unemployment and poverty rates.[52]

Before the suspension of elephant trophy imports, approximately 90% of CAMPFIRE revenue derived from hunting concessions. The revenue is split among wards, rural district councils, and the national CAMPFIRE Association, with 55% of funds directed to ward bank accounts, and 26% of funds invested in community projects.[53] Elephant hunting was the financial backbone of CAMPFIRE. Over 70% of the revenue derived

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[45] *Request for Reconsideration*, p. 17 & attachments (Pro Safaris Report).

[46] *Request for Reconsideration*, p. 17 & attachments (Martin Pieters Safaris Reports).

[47] *CF June 2014 Comment*, p. 4, 18; *CF Oct. 2014 Comment*, p. 22, 28-30.

[48] *Finding*, p. 10.

[49] *CF Oct. 2014 Comment*, p. 33 (citing *CF June 2014 Comment*, p. 17-19).

[50] *CAMPFIRE—Role of Hunting Report*, p. 2-3.

[51] From 1986-2006, CAMPFIRE channeled more than $20 million to rural villages and $17 million to RDCs. *CAMPFIRE Association Report*, p. 3-4, 8.

[52] *CAMPFIRE Association Report*, p. 3-4, 7-11; *CAMPFIRE—Role of Hunting*, Annex 1; *ZPWMA Apr. 2014 Response*, 24-28 *CF June 2014 Comment*, p. 15-17 & attachments; *CF Oct. 2014 Comment*, p. 26-27, 30-33.

[53] Relying on outdated information, the July Finding (p. 11) and Finding (p. 18) each criticize distribution of CAMPFIRE revenues, but generally that has not been an issue in the last decade, since the CAMPFIRE Constitution and revenue-sharing guidelines were revised. It is "NOT about noncompliance in disbursement of revenue to communities. It is the quality of services provided by RDCs to communities, e.g. anti-poaching, problem animal control, hunting

from elephant hunting. This exceeded $1.7 million in 2012.[54] Over 53-66% of clients were U.S. citizens, and from 2010-2015, over $5 million was generated for CAMPFIRE communities from elephant hunts by U.S. hunters.[55] However, that number has fallen since 2014.[56]

The grant of Appropriate Authority means ZPWMA foregoes the hunting fees in CAMPFIRE areas. Fees and other benefits accrue directly to the communities. CAMPFIRE communities also benefit from contracts or joint ventures with hunting operators. Conservation Force submitted specific examples of community-operator arrangements which have reduced poaching and human-wildlife conflicts. In the Mbire District where applicant PRT-04205C hunted, the operator and community maintain a "genuine joint venture." In 2013 to 2015, the operator paid over $1 million to local wards.[57] Ninety percent of this income came from hunting, 90% of clients were U.S. citizens, and over one-third of the revenue derived from elephant hunts by U.S. citizens.[58]

Likewise, under contract with the Tsholotsho district council, one operator has paid over $530,000 to the community in the same period. Over $318,000 was deposited in ward bank accounts. The operator assists with village projects on top of these payments.[59]

These are two of the many examples of livelihood improvements related to tourist hunting, with reduced encroachment and conflict as the intended results. The continued suspension of elephant trophy imports, however, obstructs the benefits generated for local communities and reverses the tolerance gains.[60] The CAMPFIRE Association wrote four reports that have been submitted to the DMA, including the CAMPFIRE Workshop report, to raise the alarm about the suspension's detrimental impact. Yet CAMPFIRE's concerns and supporting statistics have not been credited or even discussed in the Findings.

The positive, 1997 enhancement finding cited CAMPFIRE as the means Zimbabwe used to mitigate human-elephant conflict.[61] In the past, the FWS consistently supported CAMPFIRE. CAMPFIRE was considered "an excellent example of a social program built on values obtained from the sustainable utilization of wildlife resources" and "an important political-economic-sociological institution that developed an environmental ethic, restored the perception of wildlife as a valuable resource, advocated wildlife management … and encouraged the conservation of natural ecosystems and wildlife habitats on tribal lands."[62]

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administration, that often creates tension." *CF Oct. 2014 Comment*, p. 31-32 (quoting C. Jonga (Sept. 30, 2014)). The Finding quotes a portion of this email, but still reaches the opposite conclusion.

[54] *CAMPFIRE Association Report*, p. 4; *CAMPFIRE Income Analysis*.

[55] From 2010 to 2015, hunting fees accounted for over $11 million, 70% from elephant hunting and 66% from U.S. hunters. *CAMPFIRE Association Report*, p. 3-4, 8; *CAMPFIRE Income Analysis*, p. 1, 6; *CAMPFIRE—Role of Hunting*, p. 9-11.

[56] *CAMPFIRE—Role of Hunting Report*, p. 22-23.

[57] *Request for Reconsideration*, p. 15 (citing Chief Sen. D. Chisunga, *Land Use Planning at the Local Level*, Presentation at the 14th African Wildlife Consultative Forum (Nov. 10, 2015)); *CF Oct. 2014 Comment*, p. 29 & attachments.

[58] Please see note 43.

[59] Please see note 45.

[60] *CAMPFIRE—Role of Hunting Report*, p. ii.

[61] *1997 Finding*, p. 2.

[62] 57 FR 35473-01, 35480, 35484 (Aug. 10, 1992), 1992 WL 188531(F.R).

In Zimbabwe, CAMPFIRE remains the primary way rural communities benefit from the sustainable use of wildlife. The DMA's failure to consider CAMPFIRE's enhancement or damage caused by the suspension is irresponsible and detrimental to the elephant.[63] CAMPFIRE's concerns, and the suspension's impact, have recently been corroborated by an independent paper concluding that tourist hunting is important to both wildlife conservation and rural development in Zimbabwe.[64]

D. Summary of Proven Enhancement

These direct and indirect benefits have been documented.[65] Every hectare of habitat secured, every dollar generated for management and enforcement, every snare picked up, every elephant spared based on the value of a hunting fee **is enhancement**. This satisfies the "special rule" self-imposed by the FWS.[66]

Unfortunately, the DMA has chosen to obstruct this enhancement. It admits "some benefits are shown." But it has repeatedly raised the bar. Instead of requiring hunting enhance the survival of the species, the DMA apparently requires the hunting "ensure" or "guarantee" the species' survival. But neither the ESA nor the special rule uses those words. Nor does the ESA or special rule mention detailed financial break-downs, changes to a country's accounting, tracking of every dollar spent by a U.S. citizen, or a completely flawless system. The DMA has invented a standard far higher than enhancement, perhaps to legitimize its original mistake in suspending imports of lawful elephant trophies and justify continued suspension. These decisions have seemed to be pre-made and based on a political imperative, not the reality of elephant in Zimbabwe or the ESA's legal requirements.

III. DENIAL OF THE REQUEST FOR RECONSIDERATION IS BASELESS AND CONTRADICTORY

Denial of the request for reconsideration is error. Like the enhancement Findings, the DMA's denial letter is based on misconceptions. The letter claims, "[at] the time you originally applied for a permit, the Service had reviewed the best available scientific and management data…"[67] But that is impossible. The Finding dates to 2015. These applications were filed in 2016. (Until then, no permit application was even required for CITES Appendix II-listed, ESA-threatened-listed elephant imports.[68]) Within its first three paragraphs, the denial misrepresents the facts.

Moreover, the best-available information for 2015 was not considered in the Finding, which copies-and-pastes most of the July Finding and fails to engage with most of the data submitted by Conservation Force. How can a finding purport to rely upon the best-available and most up-to-date information, when so much is repeated and so little new and additional information is incorporated?[69] Moreover, the DMA was aware that it had not asked for all the information it claimed not to have, as shown in the May 12, 2015 request

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[63] *CAMPFIRE—Role of Hunting Report*, p. ii, 22-25.

[64] V.K. Muposhi et al., *Trophy Hunting, Conservation, and Rural Development in Zimbabwe: Issues, Options, and Implications*, International Journal of Biodiversity (2016), publicly available at https://www.hindawi.com/journals/ijbd/ 2016/8763980/.

[65] Please see the Index to the Request for Reconsideration.

[66] 50 C.F.R. § 17.40(e)(6)(B).

[67] C. Hoover, *Letter to Applicant PRT-04846C* (May 16, 2017), p. 1 ¶ 3.

[68] 50 C.F.R. § 17.40(e), revised by 81 Fed. Reg. 36388 (June 6, 2016).

[69] See generally *Request for Reconsideration*.

for information sent to ZPWMA.[70] ZPWMA's July 2015 Response has not been discussed in any finding or otherwise considered, even though it provides information relevant to 2015 and before, and fills in alleged information gaps. Denial of the request for reconsideration is improper because the Finding should have been updated, in keeping with its own terms, to consider this 2015 response.[71]

Last, although the denial draws a line at March 26, 2015, there is no magic date by which a finding must be made. We have DMA enhancement findings dated in March, April, July, October, and December, and there are undoubtedly findings made in other months for other species.[72] It is arbitrary, capricious, and unfair to stand on a March finding when the DMA knew Zimbabwe was updating its elephant management plan and taking other steps to satisfy the DMA's own critiques and to cut off Zimbabwe's year-long hunting season after three months.[73] This line need not be drawn, and should be reversed.

CONCLUSION

More than sufficient information has been provided to override the anecdotal information cited as grounds to support the April 2014 suspension of elephant trophy imports. Enhancement has been shown, and the DMA's mistakes in the April, July, and March findings have been corrected in the submissions by ZPWMA, Conservation Force, and others. However, the DMA has not considered a great deal of that information submitted, to the detriment of the elephant, CAMPFIRE communities, and well-managed tourist hunting system in Zimbabwe.

Reversal of the over-long suspension is urgently due. In constantly re-defining "enhancement," the DMA has blocked the very benefits it purports to require for elephant and other species. Zimbabwe's elephant management strategy largely depends upon the revenues and incentives that come from a limited hunting offtake and trade. We remain concerned that little reason remains for Zimbabwe to maintain such a large and costly elephant population, when the incentive of U.S. hunters has been blocked by the U.S. FWS. The continued suspension of elephant trophy imports is itself the greatest threat to Zimbabwe's elephant.

The best-available information demonstrates that the suspension was a mistake from inception based on anecdote and misinformation. The best-available information demonstrates that lawful hunting fulfills its promise in Zimbabwe—it secures the most habitat, pays for management and anti-poaching, and improves human tolerance of elephant and other dangerous game. Because the enhancement standard is met, the continued suspension of elephant trophy imports is arbitrary, capricious, and unlawful.

Last, the best-available information demonstrates that denial of applicants' request for reconsideration was also in error. The March 25, 2016 enhancement finding is not updated. Its arbitrary time frame should be rejected. When the best-available information is properly considered, the import of elephant hunting trophies from 2015 and beyond should be approved. When the dependent conservation program of the elephant is considered, the permits should be approved.

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[70] B. Arroyo, *Letter to Minister Kasukuwere* (May 12, 2015); *ZPWMA July 2015 Response*.

[71] E.g., *March Finding*, p. 1, 3, 6, 11.

[72] The DMA made a positive enhancement finding for the import of sport-hunted elephant trophies from Zambia in December 2012, and a positive enhancement finding for the import of wild and wild-managed lion hunting trophies from South Africa in October 2016.

[73] The DMA apparently has not denied import permit applications for hunts occurring later in 2015, as we are aware of an applicant who hunted an elephant in Zimbabwe on May 5, 2015 who has not received a denial letter.

Accordingly, we respectfully request that you reverse the denial of these permit applications and order the DMA to issue these permits.

On behalf of the applicants, we respectfully request oral argument on this appeal. We ask that you provide a contact for scheduling or contact our office to schedule this argument.

Respectfully submitted,

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Counsel for Applicants

CC: Craig Hoover

Attachments:

- Chart of Key Documents and Quotations
- Copy of Request for Reconsideration and Index of Attachments
- Copy of letter denying Request for Reconsideration
- March 25, 2016 negative Enhancement Finding

ATTACHMENT

Request for Reconsideration

† BARON BERTRAND DES CLERS, PH.D.
† JAMES G. TEER, PH.D.
† BART O'GARA, PH.D.
† DON LINDSAY

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April 6, 2017

Chief Tim Van Norman
Branch of Permits, Division of Management Authority
U.S. Fish and Wildlife Service, MS: IA
5275 Leesburg Pike
Falls Church, Virginia 22041

BY EMAIL AND FEDERAL EXPRESS

Re: Request for Reconsideration of Denial of Permit Applications PRT-04846C and PRT-04205C

Dear Chief Van Norman:

We request reconsideration of the denials of two applications for permits to import hunting trophies of elephant taken in Zimbabwe in 2015 ("Denials"). The first application was submitted by Richard Bonander, PRT-04846C, for a bull elephant taken in the Ngamo/Sikumi Forest Block in Zimbabwe on March 21, 2015. The second was submitted by Michael Jines, PRT-04205C, for a bull elephant taken in the Mbire CAMPFIRE District in Zimbabwe on February 25, 2015. Conservation Force represents both Applicants.

The Denials should be reconsidered and reversed for eight primary reasons. First, they rely upon the *Enhancement Finding for African Elephant Taken as Sport-Hunted Trophies in Zimbabwe on or after January 1, 2015*, dated March 26, 2015 ("Finding"). But the Finding fails to consider significant information submitted by Conservation Force, Zimbabwe's Parks and Wildlife Management Authority ("ZPWMA"), and others. If considered, the negative conclusion would have to be reversed. The information provided:

- Establishes that Zimbabwe has the most up-to-date management plan for African elephant in the world, with adaptive and regionally-specific action items, clear assignment of responsibilities, and means of verifying its implementation successes;
- Establishes that Zimbabwe has a relatively stable elephant population, as determined by a recent countrywide survey;
- Demonstrates that Zimbabwe has been effectively enforcing laws and policies to protect elephant and other species, and has implemented new measures and ramped-up national and local efforts to combat poaching;
- Demonstrates that hunting offtakes are sustainable and based on the consideration of all causes of elephant mortality, biological and critical social factors, and scientific recommendations;
- Reflects the full cooperation of ZPWMA in responding to the FWS' information demands, including production of sensitive budget information that underscores the essential role hunting, especially elephant hunting, plays in supporting wildlife conservation, management, and protection, both in the Parks estate and community areas;
- Evidences how the government's grant of Appropriate Authority to local landholders has created a public-private-community partnership that obligates all stakeholders to invest in protection and conservation of wildlife on their lands; and

- Proves that licensed, regulated hunting enhances the survival of elephant and other species in the country by securing habitat, generating management funding, underwriting and supporting anti-poaching, and incentivizing greater tolerance of elephant by rural community members.

In sum, because the information provided demonstrates that the enhancement standard is met, and this information was not relied upon in denying the applications, we respectfully request reconsideration and reversal of the Denials and issuance of the requested import permits.

Reason for Reconsideration 1: Failure to Consider Best-Available Information

In the Finding, the FWS repeatedly stated it would review its negative conclusion if additional information was provided.[1] But the FWS has not done so. It has not considered hundreds of pages of information in the Denials, which rely upon the Finding.

The Finding was made on March 26, 2015. Information has been provided to the FWS from April 17, 2014 through as recently as February 2017 by Conservation Force, ZPWMA, the IUCN African Elephant Specialist Group ("AfESG"), the Safari Operators Association of Zimbabwe ("SOAZ"), Safari Club International ("SCI"), individual hunting operators, and others.[2] Most of this data has ***not*** been discussed in the Finding or in an updated finding, in the two-plus years since the Finding was made.

Rather, entire paragraphs in the Finding are identical to the July 22, 2014 negative enhancement finding.[3] Because they are not updated from July 2014, they fail to address points made by Conservation Force and ZPWMA to correct errors in that July finding. Moreover, the Finding states in several places that the FWS was not provided with specific information. However, Conservation Force previously cited to where the information was provided,[4] and ZPWMA submitted additional data in its prompt and thorough July 2015 response ("ZPWMA July 2015 Response") to the FWS' third questionnaire, dated May 12, 2015 (***after*** the Finding). The ZPWMA July 2015 Response was not considered in the Denials, which rely upon the Finding. However, the July 2015 Response provides substantial information the FWS asserts is missing.[5]

This up-to-date information cannot be ignored. It demonstrates that Zimbabwe's hunting program is well-managed and sustainable. It shows how hunting in Zimbabwe enhances the survival of the elephant. The FWS' failure to consider this information requires reconsideration of the Denials. The Finding is based on outdated information, and its reservations have been resolved. Once the new information is considered

[1] E.g., *Finding*, p. 1, 3, 6, 11.

[2] An index of the information previously submitted to the FWS is attached.

[3] *Enhancement Finding for African Elephants Taken as Sport-Hunted Trophies in Zimbabwe During 2014*, dated July 22, 2014, p. 2 ¶ 6; p. 3 ¶¶ 1-3; p. 4 ¶¶ 1-2; p. 5 ¶¶ 2-3; p. 7 ¶¶ 3-4; p. 8 ¶ 4; p. 9 ¶ 1 (changed "2002 Panel of Experts" to "1997"); p. 9 ¶ 4; p. 10 ¶¶ 1-4; p. 11 ¶¶ 3-5; p. 12 ¶¶ 1-2, 5; p. 13 ¶ 1-2; p. 17 ¶ 3; p. 18 ¶¶ 2, 4; see also paragraphs in which several sentences are identical or nearly so: p. 4 ¶¶ 3-4; p. 5 ¶ 1; p. 6 ¶ 3-4; p. 7 ¶ 2; p. 8 ¶ 3; p. 9 ¶ 3; p. 14 ¶ 4 (changed numbers of RDCs); p. 16 ¶ 4; p. 17 ¶ 5; p. 18 ¶ 3.

[4] Conservation Force also provided an Appendix that cross-referenced statements claiming not to have information against the FWS' April 4, 2014 questionnaire to ZPWMA, which did not ask for much of this information. Conservation Force, *Comment Opposing the Negative Enhancement Finding for African Elephant Taken as Sport-Hunted Trophies in Zimbabwe in 2014*, dated Oct. 16, 2014 ("*CF Oct. Comment*"), passim, & Appendix 1.

[5] E.g., Compare *Finding*, p. 9, 11 (seeking revenue information), p. 11 (seeking offtake information) with ZPWMA July 2015 Response, p. 36-43 (providing revenue and offtake tables).

by the FWS, the "enhancement" generated by elephant hunting is clear, and the requested permits should issue.

The urgency of issuing these permits has not changed since the suspension was imposed in April 2014. As the Finding recognizes, elephant hunting generates operating budget revenue for ZPWMA, incentives for Zimbabwe's community-based natural resources management program (CAMPFIRE), anti-poaching, and more. The information provided, including two CAMPFIRE reports, a SOAZ report, the ZPWMA July 2015 Response and more, makes clear that American elephant hunters are the largest source of these benefits.[6] Continued refusal to issue import permits jeopardizes this enhancement and the survival of the species.

The failure to consider the best-available information is made worse because ZPWMA responded promptly to the FWS' requests. ZPWMA responded to the first questionnaire within two weeks. Its Director-General and high-level representatives immediately traveled to DC to reinforce their response. ZPWMA responded to the second questionnaire in under six weeks; responded to third—not considered in the Finding—in five weeks; responded to the fourth—not considered in the Finding—in two weeks; and responded to the fifth —not considered in the Finding—within several weeks, with the final plan prioritization completed within six months. ZPWMA has repeatedly redirected its resources to provide information to the FWS. But the FWS has repeatedly moved the target to create an unreachable standard and demanded additional, more intensive information. The bar has been raised beyond "enhancement." The FWS has acknowledged that elephant benefit from well-managed hunting.[7] But the Finding seems to require more than well-managed —it seeks management perfection. That is simply not possible, either in Zimbabwe or in this country (even the FWS is constrained by limited resources).

The information submitted shows that licensed, regulated hunting increases habitat security, generates law enforcement funding and support, and incentivizes tolerance for elephant. It shows a sustainable use of elephant at a level far too low to be detrimental. It shows that the enhancement standard, as originally defined[8] has been met. Thus, the Denials should be reconsidered and reversed.

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[6] E.g., *ZPWMA July 2015 Response*, p. 40-41 ("The US hunting market constitutes 51% and 54% of elephant trophy hunting in Zimbabwe for the years 2013 and 2014 respectively."); CAMPFIRE Association, *Trophy Imports Suspension and the CAMPFIRE Program*) (2014), p. 4 ("*CAMPFIRE Association Report*") (U.S. hunters represent two-thirds or more of CAMPFIRE clients); E. Gandiwa, *Proceedings of the CAMPFIRE Stakeholders' Workshop: Towards the Development of a New Elephant Management Plan and Policy* (Nov. 2014) ("*CAMPFIRE Workshop Proceedings*"), p. 6-21; CAMPFIRE Association, *CAMPFIRE Hunting Income & Distribution* (Dec. 1, 2015) ("*CAMPFIRE Income Analysis*"), p. 6; ZPWMA, Presentation, *Legal Trade, Conservation, and Rural Livelihoods: A Zimbabwean Perspective* (Dec. 2016), p. 19; SOAZ, *Status of Elephant Populations, Hunting, and Anti-Poaching Effort in Safari Areas in Zimbabwe* (2014), p. 3-4 ("*SOAZ Report*")

[7] E.g., FWS, *Suspension of Import of Elephant Hunting Trophies Taken in Tanzania and Zimbabwe in 2015 and Beyond, Questions & Answers* (2014).

[8] In denying import permits for elephant from Tanzania, the FWS defined enhancement as: "activities that provide a direct benefit to the specie being hunted. Such benefits could include the use of revenue generated by the hunt to support conservation projects or to manage the species. Other benefits that could result from activities that enhance the survival of the species include improving human-wildlife conflicts, anti-poaching efforts, or habitat conservation." According to this standard and definition, and not the one created in the Finding, there is no doubt the importation of sport-hunted elephant into the U.S. enhances the species.

Reason for Reconsideration 2:
The Denials Fail to Consider Zimbabwe's State-of-the-Art Elephant Management Plans

ZPWMA has recently adopted and is implementing the most cutting-edge elephant management regime among range nations, the *Zimbabwe Elephant Management Plan (2015-2020)* ("Plan"). This effort attests to ZPWMA's commitment to elephant management and conservation. The new Plan further exemplifies the importance of sport-hunting in this system. The Denials fail to consider this essential new Plan, which the FWS has had for over one year.

Instead, the outdated Finding errs by considering *Elephant Management in Zimbabwe* to be the country's management plan, despite being told it was not.[9] The FWS' concerns about a claimed lack of measurable outcomes in Zimbabwe's actual former management plan, the *Policy and Plan for Elephant Management in Zimbabwe*, have been resolved. As the FWS was repeatedly told, a new management plan was adopted, with specific action items, deliverables, and deadlines (as suggested was necessary by the April and July negative enhancement findings).[10] The FWS knew of the new Plan's details because the FWS received the *Plan Workshop Proceedings* in December 2014, before the Finding was made.[11] The FWS was also informed that Zimbabwe would manage each main range area adaptively pursuant to a regional plan. The FWS was sent the proceeding of regional workshops, and the final regional plans as part of the final national Plan.[12] And in November 2016, the FWS was provided with information on the implementation and prioritization of these plans at the request of the Chief of Permits.[13] In short, throughout the Plan's drafting, ZPWMA and Conservation Force kept the FWS fully apprised of the status and what the Plan would entail. However, little of this information was considered in the Finding or the Denials.

Had the new Plan been considered, these permits would have to be approved. The Plan incorporates an adaptive management framework with higher-level Targets, Key Components, Strategic Objectives, and Outputs. It breaks each Key Component into specific management actions, the achievement of which will be measured and verified through Key Performance Indicators ("KPIs") and Means of Verification of KPIs. The Plan sets deadlines and assigns specific responsibility for achieving each Action. It focuses on five key components: 1. Protection and Law Enforcement, 2. Biological Monitoring and Management, 3. Social,

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[9] *CF Oct. 2014 Comment*, p. 8 ("Elephant Management in Zimbabwe 'is not a management plan,' and FWS should not expect 'specific measurable or management actions' to be in that particular document") & related attachments.

[10] *CF June 2014 Comment*, p. 13 & related attachments; *CF Oct. 2014 Comment*, p. 9 & related attachments; *CF Dec. 2014 Comment*, p. 3 & related attachments; CF Email to T. Van Norman forwarding invitation to national workshop (Nov. 13, 2014); CF Email to T. Van Norman forwarding Workshop agenda (Dec. 1, 2014); CF Email to T. Van Norman forwarding summary of Plan Workshop (Dec. 5, 2014); *ZPWMA Dec. 2014 Response*, p. 18; *ZPWMA July 2015 Response*, p. 9-14, 18-19.

[11] CF Email to T. Van Norman forwarding Proceedings of the National Elephant Management Plan Workshop (Dec. 23, 2014) ("*Plan Workshop Proceedings*").

[12] CF Email to T. Van Norman forwarding preparatory documents for Sebungwe workshop (May 4, 2015); CF Email to T. Van Norman forwarding Mana Pools Workshop Proceedings (May 5 2015); CF Email to T. Van Norman forwarding Sebungwe workshop agenda (May 8, 2015); CF Email to T. Van Norman forwarding Sebungwe workshop fact sheet (May 14, 2015); CF Email to T. Van Norman forwarding South East Lowveld Workshop Proceedings (Sept. 30, 2015); CF Email to T. Van Norman forwarding final print of Plan (Feb. 29, 2016); *ZPWMA July 2015 Response*, Attachments.

[13] L. Nyaguse (ZPWMA) Email to T. Van Norman forwarding Zimbabwe National Elephant Supplementary Management Plan (2015-2010) (Nov. 9, 2016) ("*Plan Supplement*").

Economic, and Cultural Framework, 4. Building Conservation Capacity, and 5. Coordination, Collaboration, and Program Management.[14]

The Plan breaks down elephant management by range, as their challenges differ. For example, authorities must manage overpopulated elephant and provision of water in North West Matabeleland compared to a reduced population targeted to recover in Sebungwe. These differences are addressed in the actions and indicators of each regional plan.[15]

The Plan provides for accountability, transparency, and effective implementation in the terms of reference for an Elephant Manager tasked with directing elephant management in Zimbabwe. The Plan also created a National Elephant Management Committee and four range-specific committees to review progress and oversee implementation.[16]

Examples of "Protection" activities include establishing a rapid-response anti-poaching unit in conjunction with the Zimbabwe Republic Police, expanding ZPWMA's informer networks, and connecting national law enforcement databases. Monitoring activities include periodic surveys and setting Thresholds of Potential Concern as early-warning indicators in key habitats. An example KPI for "Building Conservation Capacity" is to channel most income from elephant hunting back into elephant management, with ongoing oversight through reports on funds available and utilized.[17] As these examples show, the Plan incorporates ***specific*** actions and KPIs, and specific oversight mechanisms.

The Plan addresses human-elephant conflict in the Social, Economic, and Cultural Framework component. The Plan recognizes there is no single solution to conflict, and commits to "undertake additional research on problem animal control and minimizing conflict." It emphasizes the importance of local communities' tolerance towards elephants through a system of benefits-sharing as a long-term solution to conflict.[18]

The Plan also specifically integrates licensed, regulated elephant hunting as a management tool:

> To have a future, elephant must have a value. Value to the governing authorities and to the local people. The greater the value, the greater the tolerance of them is likely to be … Regulated sport hunting converts wildlife into assets for the benefit of local people and the country as a whole… elephant and other wildlife populations will be negatively affected though reduced conservation efforts arising from low funding and reduced goodwill from the communities, when… the elephant has the economic potential to raise adequate funds to support itself and other species. For these reasons, Zimbabwe confirms its commitment to the sustainable use of elephant and other wildlife in this Action Plan.[19]

[14] *Plan*, p. 16-17.

[15] *Plan*, p. 38-80 (Annexes 9.4-9.7).

[16] *Plan*, p. 13-14, 35-37.

[17] E.g., *Plan*, p. 19-27.

[18] *Plan*, p. 15.

[19] *Plan*, p. 12.

The Plan addresses the Finding's concerns on every level. It implements an effective management system, with the necessary "specific goals and measures with specific actions to be taken."[20] Moreover, ZPWMA provided to FWS a 2016 report on its progress in implementing the Plan and prioritizing implementation, including of the regional plans. The Plan Supplement emphasizes law enforcement and training to combat poaching and ivory trafficking.[21] The FWS requested the prioritization, and ZPWMA again demonstrated its good faith in preparing and providing the document, which was not considered in the Finding or the Denials. Because the Finding's concerns are resolved and new information reveals an effective, adaptive management plan and implementation thereof in Zimbabwe, the Denials should be reconsidered and reversed.[22]

Reason for Reconsideration 3:
Zimbabwe has Current Elephant Population Information that Guides its Sustainable Use

The AfESG recently estimated Zimbabwe's elephant population at 82,630 ± 8,589 across a range of 81,228 km^2.[23] Zimbabwe maintains the second-largest elephant population in Africa, at a level nearly double its estimated carrying capacity.[24] The population is most concentrated in the North West Matabeleland and South East Lowveld ranges. The current national estimate is approximately 6,000 lower than the 2001 countrywide estimate, a percentage calculated as "not statistically significant" by the survey's authors.[25] Zimbabwe's current elephant population is 20% larger than its population in 1997 (66,000), when the FWS made a positive enhancement finding. The Finding does not explain why a 20% increase is insufficient.[26]

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[20] *Finding*, p. 6. The Plan applies a multi-tiered approach, using tailored goals leading to achievement of the "Long-Term Vision," which is: "To conserve elephants at levels that will enable them to contribute to the conservation of biodiversity, national development and Zimbabwe's cultural heritage." The Plan establishes intermediate "Targets" to achieving these goals, which are in line with the 1997 *Policy and Plan*: "1. To maintain at least four demographically and genetically viable elephant populations in Zimbabwe[;] 2. To maintain or increase core protected range of elephant in Zimbabwe[;] 3. To maintain numbers/density of elephant at levels that do not adversely impact on biodiversity conservation goals while contributing to economically viable and sustainable wildlife-based land uses in Zimbabwe." As in the draft provided to the FWS in December 2014, the final Plan is organized by "Key Components," and then "Strategic Objectives" that explain the "Key Components." "Outputs" describe the desired outcomes, and are to be achieved through implementation of "Key Activities/Actions." That implementation is monitored by the KPIs and Means of Verification of the KPIs.

[21] *Plan Supplement*, p. 6.

[22] As ZPWMA explained, Zimbabwe conserves and manages elephant on every level. Zimbabwe and bordering range states have formed Trans-Frontier Conservation Areas ("TFCAs") to address the elephant's migratory nature and cross border populations. Further, through the Plan Zimbabwe implements the action plans adopted by the Southern African Development Community ("SADC"), and the SADC Regional Elephant Management Strategy of 2007. E.g., *ZPWMA April 2014 Response*, p. 12; *ZPWMA July 2015 Response*, p. 15; *CF June 2014 Comment*, p. 12 & related attachments; *CF Oct. 2014 Comment*, p. 9 & related attachments.

[23] IUCN/AfESG, African Elephant Status Report 2016 (Sept. 2016), publicly available at https://www.dropbox.com/s/7a8w3kk6r9hzm0r/AfESG%20African%20Elephant%20Status%20Report%202016.pdf?dl=1.

[24] *Plan*, p. 3.

[25] *Plan*, p. 3. As explained above, the Management Plan incorporates regional plans to address challenges unique to each range and manage elephant within regional targets.

[26] The Finding suggests an increase to over 100,000 elephant would be acceptable. P. 8. As ZPWMA, Conservation Force, Rowan Martin, and others pointed out, a population of that size would be a catastrophe for the country's bio-diversity. The Finding does not account for the expansion in Zimbabwe's elephant since 1997, or the management measures implemented since then. Zimbabwe's elephant population has rebounded incredibly, from a low of 4,000

Worse, the Finding does not rely on this up-to-date estimate, although the FWS received the preliminary survey results in December 2014.[27] Nor does the Finding rely on the best-available information in the FWS' possession as of March 2015, which included comments from the AfESG and numerous survey results.[28] The Denials should be reconsidered because the Finding relies upon outdated data that was proven to be inaccurate by Conservation Force, ZPWMA, and the AfESG.

For example, the Finding reuses language that cites a statistic from *Elephant Management in Zimbabwe*. The statement was disavowed by its author, and Conservation Force explained how the percent limitation was being taken out of context.[29] The Finding's failure to consider information that undercuts a "fact" on which its negative conclusion was based is clear grounds for reconsideration. Similarly, the Finding admits the April finding erroneously interpreted the AfESG's Elephant Database by misconstruing its data quality categories. This error was pointed out in CF's June 2014 Comment and in a May 30, 2014 email from Dr. Holly Dublin, AfESG Chair.[30] It was corrected in the July enhancement finding.

However, the July finding continued to ignore pertinent information in the database, prompting Dr. Dublin to send a November 3, 2014 comment in which she corrected several critical points of information. First, the addition of a 2007 survey resulted in the addition of 30,000 "Definite" elephant in Zimbabwe. Second, the results of four recent surveys did not show a "substantial decline," as the July finding stated, but largely reflected stable or increasing populations. The Finding apparently accepted these comments, and edited the prior statements to incorporate Dr. Dublin's corrections.[31]

However, Dr. Dublin offered three more corrections not discussed in the Finding. Instead, the challenged language was copied and pasted from the July document into the Finding.

- Dr. Dublin criticized the July finding's dismissal of a 2013 survey in Save Valley Conservancy for so-called "double counting," stating that, even if double-counting occurred, the count still reflected an increase in the elephant population;

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in 1900. *ZPWMA July 2015 Response*, p. 3; *CF June 2014 Comment*, p. 7-8 & related attachments; *CF Oct. 2014 Comment*, p. 7, 10 & related attachments. Compare FWS, *Enhancement Finding for African Elephants Taken as Sport-Hunted Trophies in Zimbabwe* (July 2, 1992), p. 1.

[27] CF Email to T. Van Norman forwarding preliminary survey results (Dec. 5, 2014).

[28] H. Dublin Email to T. Van Norman attaching AfESG Letter/Comment on July finding (Nov. 3, 2014), p. 2-9 ("*AfESG Letter*"); Aerial Survey of Elephants and Other Large Herbivores in the Mid-Zambezi Valley; 2007 Aerial Survey of Elephants and Other Large Herbivores in North-West Matabeleland; 2010 Aerial Survey of Elephants and Other Large Herbivores in Chewore Safari Area; 2013 Aerial Survey of Elephants and Other Large Herbivores in the Save Valley Conservancy; and 2013 Aerial Survey of Elephants and Other Large Herbivores in Gonarezhou National Park.

[29] *CF Oct. 2014 Comment*, p. 9, 15 & related attachments.

[30] Compare *Finding*, p. 7; with *CF June 2014 Comment*, p. 9 & related attachments; H. Dublin Email to T. Van Norman commenting on the April finding's misinterpretation of the AfESG Database (May 30, 2014).

[31] Compare *AfESG Letter*, p. 2 ("The AED shows, however, that three surveys carried out in this period … estimated higher totals than their respective previous, comparable surveys, although the differences were not significant. A fourth survey, Chewore (2010), resulted in an estimate lower than its previous, comparable survey, but the difference was also not statistically significant. Furthermore, the 2010 survey for Chewore did not cover the entire Zambezi Valley ecosystem, and therefore it is possible that the apparent decline, however slight, may be due to elephant movements within the ecosystem rather than to an actual decline.") with July finding, p. 6; *March Finding*, p. 7.

- Dr. Dublin concluded that a 4% carcass ratio in a 2013 survey of Gonarezhou National Park was a "reasonable figure," and the July finding erroneously "conflat[ed] … carcass ratios … and mortality rates, and its conclusion is unwarranted";
- Dr. Dublin noted that updated PIKE data was publicly available months before the July finding was made, yet "the finding stated that 2012 and 2013 data were not available," and pointed out that the two PIKE sites in Zimbabwe "have relatively small elephant populations and are by no means intended to be representative of the situation in the country as a whole."[32]

Given that Dr. Dublin is one of the world's foremost experts in elephant, due deference should have been given to her comments and suggestions. Conservation Force made similar points in our June and October comments as well, and provided comments from the authors of the Save Valley survey report responding to the FWS' statements.[33] We provided fice surveys pending the AfESG's review and not included in the AfESG's or FWS' estimates, and submitted updated PIKE information showing the Proportion of Illegally Killed Elephant had declined at the Zimbabwe sites[34]—contrary to the July finding's statements, copied-and-pasted into the Finding. The Denials' failure to review this best-available information, and reliance upon out-of-date or misinterpreted information, requires reconsideration.

Reason for Reconsideration 4: The Best-Available Information Demonstrates that Zimbabwe has been Enforcing its National Regulations as Effectively as Possible

ZPWMA is succeeding in managing and conserving its elephant. The most compelling evidence is the historic increase in its population, to become Africa's second-largest. ZPWMA achieved these results by largely curbing poaching and successfully prosecuting poachers as a result of adaptive and pro-active law enforcement measures. ZPWMA has also implemented a system of sharing responsibility with the private sector and communal landholders so as to share the financial burden of its management and enforcement obligations. The Finding fails to acknowledge these achievements and responsibility-sharing.[35] Its failure to do so requires reconsideration, and reversal of the Denials.

Evidence of ZPWMA's enforcement success was provided in their April 2014 and July 2015 Responses, and in Conservation Forces' June 2014 and October 2014 Comments. For instance, ZPWMA rapidly responded to the 2013 Hwange poisoning incident. Working with the hunting operator's team to track the poachers,

[32] *AfESG Letter*, p. 4-5.

[33] CF Email to T. Van Norman forwarding response from authors of the Save Valley Conservancy survey (Jan. 6, 2015); *CF Oct. 2014 Comment*, p. 13 & related attachments.

[34] E.g., 2005 Aerial Survey of Elephants and Other Large Herbivores in the Mid-Zambezi Valley; 2007 Aerial Survey of Elephants and Other Large Herbivores in North-West Matabeleland; 2010 Aerial Survey of Elephants and Other Large Herbivores in Chewore Safari Area; 2013 Aerial Survey of Elephants and Other Large Herbivores in the Save Valley Conservancy; and 2013 Aerial Survey of Elephants and Other Large Herbivores in Gonarezhou National Park; *see CF June 2014 Comment*, p. 4-7 & related attachments; *CF Oct. 2014 Comment*, p. 11 & related attachments.

[35] The FWS recognizes "there may be limited resources available for elephant management." *Finding*, p. 2. However, the FWS does not account for this in evaluating ZPWMA's efforts and results. "Enhancement" does not call for unlimited resources and perfect implementation, it seeks benefits. The benefits provided through the sport-hunting of elephant are clear and convincing, and the Denials should be reversed.

ZPWMA successfully arrested all 35 members of the team. ZPWMA's investigation and prosecution efforts led to the deterrent sentencing of each poacher to terms of 9 to 16 years in prison.[36]

ZPWMA specifically responded to the threat of poaching in Hwange by improving radio communications, adding aerial surveillance, and holding 35 public awareness meetings in the area.[37] ZPWMA then stepped-up its anti-poaching nationally by adopting a number of "Urgent Measures." ZPWMA acted to increase poaching penalties, criminalize the use of cyanide in poaching, increase air surveillance of protected areas, collaborate with national law enforcement and military agencies to raise elephant poaching to "a level of National Security in Zimbabwe," improve intelligence-sharing across international borders, and other important undertakings.[38] ZPWMA also held a judiciary awareness program to ensure full implementation of relevant poaching laws and penalties throughout prosecution and sentencing.[39]

ZPWMA directs most of its financial resources to anti-poaching and enforcement. As shown in the July 2015 Response, most of ZPWMA's budget (77%) is allocated for staff costs and patrol provisions.[40] These expenditures fund anti-poaching throughout the elephant range. Despite financial constraints, ZPWMA has been able to continuously hire to expand the number of patrol days in the field. ZPWMA has a staff of 1,504 active field rangers, with the intent to add more.[41] ZPWMA has shown that it can mobilize when called upon: after the Hwange poisoning, a new station with 15 field rangers was established in the area.[42]

Over 80% of spending under the new elephant management Plan has been on law enforcement (anti-poaching) and trainings, with law enforcement identified as the number one priority going forward.[43] The budget and operational data provided in the ZPWMA July 2015 Response and Plan Supplement addresses the FWS' asserted lack of information in the Finding. And although financial constraints exist in Zimbabwe (as in most range states), ZPWMA has effectively and efficiently maximized the impact of every dollar spent on anti-poaching. ZPWMA's results in curbing poaching speak for themselves.

The Finding continues to rely on outdated, unfounded criticisms from the July finding that were corrected by Conservation Force and ZPWMA. First, though the Finding claims not to have received information on Zimbabwe's poaching arrests and prosecutions, that information was not requested until May 2015, yet was provided in ZPWMA's April 2014 Response. It would be unfair to base a negative finding on data that had not been requested. But the data ***was*** provided, and should have been reviewed.[44]

Further, the Denials mistaken rely on the Finding's comments and interpretation of outdated ETIS reports. Conservation Force objected to these reports being taken out of context in our October 2014 Comment,

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[36] *ZPWMA July 2015 Response*, p. 35; *CF Oct. 2014 Comment*, p. 18 & related attachments.

[37] *ZPWMA July 2015 Response*, p. 35; *ZPWMA April 2014 Response*, p. 13; *ZPWMA Dec. 2014 Response*, p. 16-20; *CF Oct. 2014 Comment*, p. 18 & related attachments.

[38] *ZPWMA July 2015 Response*, p. 27-31; *ZPWMA Dec. 2014 Response*, p. 16-18.

[39] *ZPWMA July 2015 Response*, p. 34.

[40] *ZPWMA July 2015 Response*, p. 36-41.

[41] ZPWMA hired 100 rangers in 2014. *ZPWMA July 2015 Response*, p. 32-33.

[42] *ZPWMA July 2015 Response*, p. 27; *ZPWMA April 2014 Response*, p. 13.

[43] *Plan Supplement*, p. 3-4.

[44] *ZPWMA April 2014 Response*, p. 12, 14.

and provided evidence of improvements since 2010.[45] The Finding's reuse of these paragraphs, whose validity and applicability were challenged, merits reconsideration.

Finally, as discussed further under "Local Conservation Efforts," the Parks and Wildlife Act Chapter 20:14 devolved authority to manage and benefit from wildlife on communal and private lands to the landholders. In Safari Areas, ZPWMA leases concessions to pre-qualified hunting operators, which gives them authority to manage and benefit from approved wildlife in those areas.[46] "ZPWMA is engaging private players in co-management in some areas … this will help in resource mobilization and management for law enforcement. Long-term lease agreements (10-25 years) are being entered into to manage some protected areas."[47] In certain areas, ZPWMA partners with safari operators[48]; in others, they partner with non-profits, such as the Tashinga Initiative in the Zambezi Valley and WWF in the Hwange-Sanyati Biological Corridor.[49] In these ways, ZPWMA is sharing responsibility for enforcement of national regulations. This allows ZPWMA to do more with less, and has been especially crucial since receipts from hunting have fallen since the FWS suspension on ivory imports.

Reason for Reconsideration 5: Elephant Hunting in Zimbabwe is a Sustainable, Beneficial Use

ZPWMA's elephant hunting program is sustainable. Information submitted to the FWS demonstrates that quotas and offtakes are responsibly set in a participatory process, considering a range of inputs including all causes of elephant mortality; ZPWMA allocates quotas by region and locality; and recent poaching has remained fairly low, especially in comparison to other range states. This information has been submitted to the FWS on multiple occasions, including but not limited to:

- April 2014: poaching statistics; poacher arrest and prosecution statistics; four-page description of ZPWMA's quota-setting process;
- June 2014: poaching statistics in CAMPFIRE areas;
- December 2014: poaching and PAC statistics; offtake percentages from management, hunting, and trade in skins; two-page supplemental explanation of ZPWMA's quota-setting process;
- December 2014: hunting and PAC offtakes; quota utilization in CAMPFIRE areas;
- December 2014: carcass observance and estimates from the 2014 aerial survey;
- March 2015: updated MIKE/PIKE statistics;
- May 2015: poaching statistics from Mana Pools workshop;
- May 2015: poaching and offtake statistics in the Sebungwe;
- July 2015: carcass observance and estimates from the 2014 aerial survey; PIKE data; offtakes from six categories requested by the FWS; poaching and poacher investigation, arrest, and prosecution statistics; five-page supplemental explanation of ZPWMA's quota-setting process; quota allocation by range;
- September 2015: poaching and hunting offtakes from the South East Low Veld workshop;
- December 2015: hunting off-takes and quota utilization in CAMPFIRE areas;

[45] *CF Oct. 2014 Comment*, p. 22 (pointing out that the ETIS report was known to "confound" legal and illegal trade in small ivory products) & related attachments.

[46] *ZPWMA April 2014 Response*, p. 23-25.

[47] *ZPWMA Dec. 2014 Response*, p. 19.

[48] *ZPWMA July 2015 Response*, p. 34.

[49] *ZPWMA July 2015 Response*, p. 33.

- December 2016: two-page supplemental explanation of ZPWMA's quota-setting process;
- And more.[50]

This long list of information provided refutes the Finding's complaint that the FWS did not have "adequate information" about elephant offtakes, poaching, or quota-setting. The information was available. But the Denials do not consider it. If it had been considered, the FWS would have had to make a positive finding.

This best-available information demonstrates that ZPWMA's quotas are "scientifically determined" not to "compromise[e] [the species'] biological proliferation… In Zimbabwe, determination and implementation of hunting quotas goes through a rigorous quota-setting methodology" that accounts for all mortalities, including from hunting, poaching, PAC, natural causes and disease. In setting quotas, ZPWMA considers population sizes, trends, and densities; property sizes and habitat quality; environmental changes; human-wildlife conflict, national policies, and management targets; poaching trends; land tenure; trophy quality; hunt success; ranger monitoring; species sensitivity and research on the species; and more.[51] Quotas are set in participatory workshops for each range area. While stakeholders may propose an initial quota, their proposals are reviewed and revised as needed by ZPWMA ecologists to ensure the quotas are assessed at a sustainable level, having negligible impact on the population.[52] In 2014, Zimbabwe's offtake quota was set under 300 elephant; in 2016, it was set at 400.[53] The level of ***offtake*** authorized is well below that of ***export*** allowed under Zimbabwe's CITES quota (500 elephant), for good reason—exports may be delayed due to transport, taxidermy/processing, or permitting issues.

ZPWMA's 2014 quota of 300 mature elephant bulls represents only 0.37% of the total elephant population (82,000+). Zimbabwe's 2016 quota represents only 0.49%. These percentages are comfortably below the sustainability threshold of 0.6-0.75%. Most critically, however, actual offtakes are even lower, on average only 204 mature elephant bulls per year. That represents only 0.25% of Zimbabwe's elephant population. The Denials should be reconsidered and reversed, as there can be no question this limited use of elephant through sport- hunting is sustainable.

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[50] *ZPWMA April 2014 Response*, p. 12, 14, 19-22; *CAMPFIRE Association Report*, p. 2; *ZPWMA Dec. 2014 Response*, p. 16, 22-25; *CAMPFIRE Workshop Proceedings*, p. 6-24; CF Email to T. Van Norman attaching newest MIKE/PIKE data (Mar. 11, 2015); *Proceedings of the Mana Pools Anti-Poaching Workshop* (May 2015); CF Email to T. Van Norman attaching background data on elephant in the Sebungwe range (May 11, 2015); *ZPWMA July 2015 Response*, p. 22-27, 43-49; *Proceedings of the South East Lowveld Elephant Management Planning Workshop* (Sept. 2015); CF Email forwarding *Hunting Income Analysis of CAMPFIRE Districts from Hunting* (Dec. 1, 2015); ZPWMA, Presentation, *Legal Trade, Conservation, and Rural Livelihoods: A Zimbabwean Perspective* (Dec. 2016), p. 5-6.

Publicly available data from the Great Elephant Census identified Zimbabwe as having one of the four lowest carcass ratios in Africa, behind only Uganda, Malawi, and Botswana, publicly available at www.greatelephantcensus.org.

[51] E.g., *ZPWMA Apr. 2014 Response*, p. 19-22; *ZPWMA Dec. 2014 Response*, p. 22-25; *ZPWMA July 2015 Response*, p. 43-47; ZPWMA, Presentation, *Legal Trade, Conservation, and Rural Livelihoods: A Zimbabwean Perspective* (Dec. 2016), p. 5-6.

[52] *ZPWMA July 2015 Response*, p. 43-46; ZPWMA, Presentation, *Legal Trade, Conservation, and Rural Livelihoods: A Zimbabwean Perspective* (Dec. 2016), p. 5-6. Licensed, regulated hunting has nominal effect on elephant population, because of the selectivity of the harvest. E.g., *CF June 2014 Comment*, p. 3, 9-10 & related attachments (including R. Martin, *Second Report: Trophy Hunting from Declining Population* (2014), p. 8, 10, 15, 18-20, & R. Martin, *Background Study, Elephants* (2015), p. 34, 56).

[53] *ZPWMA July 2015 Response*, p. 44, 46.

Further, the extensive documentation provided by ZPWMA, Conservation Force, and others demonstrates that other offtakes, including poaching and PAC, are sustainable. Poaching has largely been controlled in the last several years, and PAC is kept in check through the incentives generated by CAMPFIRE (please see the next section).[54]

Poaching levels have declined in Zimbabwe, and across Africa, since the worst of the impact in 2011.[55] As shown in ZPWMA's July 2015 Response, a decline in elephant poaching is evident since the high of 223 in 2011, to 212 in 2012 and 194 in 2014. (Poaching figures in 2013 are skewed by the mass poisoning incident at Hwange National Park that killed 103 elephant, but if that number is "normalized" to 190, it is consistent with the decreasing trend.)[56] Likewise, the Proportion of Illegally Killed Elephants ("PIKE") at the Chewore and Nyami Nyami Monitoring the Illegal Killing of Elephants ("MIKE") sites in Zimbabwe has fallen: to 0.40 in 2013, 0.17 in 2014, and 0.29 in 2015 at Chewore, and from 0.81 in 2011 to 0.27, 0.22, 0.37, and 0.35 in the years 2012 to 2015 at Nyami Nyami. The most recent figures are well below the 0.5% threshold which signifies unsustainable poaching.[57] The decline in poaching undoubtedly stems from ZPWMA's enhanced anti-poaching, as described in the section above.

Recognizing both a mutual interest, and that collaboration will allow for a more efficient use of resources, ZPWMA and the hunting sector collaborate extensively in anti-poaching. Conservation Force submitted numerous specific evidence of this.[58] A few examples from this evidence are below:

- The Dande Anti-Poaching Unit ("DAPU") in the Zambezi Valley has catalyzed a significant decrease in poaching in their areas. In 2010, DAPU reported 40 elephant carcasses. In 2016, they observed seven. DAPU team members have grown so skilled in anti-poaching tactics they work alongside ZPWMA rangers in patrolling Mana Pools National Park. Charlton McCallum Safaris spent $95,006 on DAPU's anti-poaching activities in 2016, including salaries, rations, rewards, equipment, and

[54] PAC offtakes have been between 44-52 elephant from 2013-2015, a negligible amount in a population over 82,000 elephant, and at or below 1.0% when added to poaching and hunting offtakes. ZPWMA issues few PAC permits, and instead relies on the benefits of the CAMPFIRE program and voluntary actions of hunting operators to minimize crop-raiding and losses to elephant, and thus minimize PAC. The CAMPFIRE Workshop demonstrated that this system is working, as PAC figures were typically low across the districts. *CAMPFIRE Workshop Proceedings*, p. 6-21; *see also CF June 2014 Comment*, p. 15-7 & related attachments; *CF Oct. 2014 Comment*, p. 26-33 & related attachments; *CF Dec. 2014 Comment*, p. 3-7 & related attachments; *CF Jan. 2015 Comment* & related attachments.

The uncited "anecdotal evidence" relied upon in the Finding is unreliable, and is another incorrect "fact" on which the negative finding was based that requires reconsideration.

[55] G. Wittmeyer et al., *Illegal Killing for Ivory Drives Global Decline in African Elephants*, Proceedings of the National Academy of Sciences (July 22, 2014).

[56] *ZPWMA July 2015 Response*, p. 43.

[57] *CF Oct. 2014 Comment*, p. 21-22 & related attachments; CF Email to T. Van Norman attaching updated MIKE/PIKE data (Mar. 11, 2015); *ZPWMA July 2015 Response*, p. 25; CITES/MIKE Database, publicly available at https://cites.org/ eng/ prog/mike/data_and_reports.

[58] E.g., *CF June 2014 Comment*, p. 17-19 & related attachments (including SOAZ report); *CF Oct. 2014 Comment*, p. 22, 26-33 & related attachments; *CF Dec. 2014 Comment*, p. 3-7 & related attachments; *CF Jan. 2015 Comment* & related attachments; *Proceedings of the Mana Pools Anti-Poaching Workshop* (May 2015); CF Email to T. Van Norman forwarding reports of anti-poaching efforts in Zambezi Valley (Dec. 3, 2015); CF Email to T. Van Norman forwarding hunting operator anti-poaching efforts in Zambezi Valley (Jan. 5, 2016); CF Email to T. Van Norman forwarding DAPU film (May 9, 2016); CF Emails to T. Van Norman forwarding DAPU Reports (June 15, 2015, May 23, 2016, & Jan. 18, 2017).

vehicles. DAPU's expenditures in 2015 topped $80,000 and in 2014, they were over $72,000. This is an expanding program, and has contributed significantly to anti-poaching in the Zambezi Valley, including through the additional support of aerial surveillance. ***Mr. Jines' hunt took place in the Mbire District and with Charlton McCallum Safaris. Mr. Jines' hunting fees, including his trophy fee and voluntary contributions, are directly contributing to DAPU and the operators' extensive community investment***.

- The SOAZ Report identified almost $1 million spent on anti-poaching in 2013 by a small sample of 14 operators. These operators employed a total of 245 scouts on the ground, an average of 17-18 scouts per company.
- Lodzi Hunters collaborates with the Binga district council to restore wildlife in their concession, on which they have a long-term lease. They maintain a 12-member anti-poaching team that patrols the concession and the borders of Hwange National Park. Lodzi Hunters coordinates with ZPWMA to ensure full and efficient coverage. Lodzi Hunters' anti-poaching and incentives programs cost the company over $350,000 per year, in addition to their contractual payments to the CAMPFIRE district and wards. 95% of Lodzi Hunters' income comes from elephant hunting.

In short, the private-sector's contributions against poaching are extensive. They were not duly considered in the Denials, even though they are an essential component of Zimbabwe's elephant management.[59] For this reason, the Denials should be reconsidered, and will need to be reversed based on proper evaluation of the submitted data.

Reason for Reconsideration 6: Revenues Generated from Elephant Hunting in Zimbabwe are Reinvested in Elephant Conservation Efforts by ZPWMA and CAMPFIRE Communities

The information provided to the FWS documents that elephant hunting accounts for the largest percent of revenue generated by hunting across all four land categories (safari areas, communal land, private land, and forestry areas). In 2014, over $6.2 million in trophy fees was generated from elephant hunts, with $5 million of that revenue accruing to ZPWMA to reinvest in wildlife management and enforcement.[60] Over 50% of that revenue comes from U.S. hunters.[61] Put differently, "the African elephant is one of the biggest drawcard species from a hunting perspective and is at the centre of all the major hunts… Generally hunting contributed an average of USD22m to the country's GDP in 2014 and 2015..."[62]

A significant portion of ZPWMA's operating budget relies upon hunting income (although that proportion declined in 2015, as hunting income has decreased, largely due to the FWS' elephant suspension and non-issuance of lion import permits).[63] Most of this is attributable to elephant hunts. In turn, most of ZPWMA's operating funds are directed to ranger salaries, anti-poaching, and law enforcement—over $3.1 million in Safari Areas alone (and staff costs in Safari Areas are covered by hunting revenues). Put simply, most of the revenues coming in from elephant hunting are reinvested in and contribute to the protection and

[59] *Plan*, p. 12 ("The Role of Sport Hunting in Elephant Conservation").

[60] *ZPWMA July 2015 Response*, p. 48.

[61] *ZPWMA July 2015 Response*, p. 41.

[62] ZPWMA, Presentation, *Legal Trade, Conservation, and Rural Livelihoods: A Zimbabwean Perspective* (Dec. 2016), p. 9-10.

[63] *ZPWMA Dec.* 2014 *Response*, p. 21.

recovery of elephant by being reinvested in law enforcement and anti-poaching.[64] The Denials' failure to consider the July 2015 Response and information about ZPWMA's revenue, budget, and expenditures requires reconsideration and reversal.

In communal areas, elephant hunting is the financial backbone of CAMPFIRE. CAMPFIRE is the mechanism whereby communities benefit from living with wildlife, and largely from living with elephant. The program has built tolerance within communities through creation of incentives, especially due to the funding of infrastructure projects that improve rural livelihoods across communities.[65] The Finding correctly admits that "CAMPFIRE plays a role in elephant management." More precisely, CAMPFIRE plays an ***essential*** role in elephant conservation by reducing conflicts between elephant and the communities who maintain elephant on their lands. Zimbabwe's Parks and Wildlife Act Chapter 20:14 empowered rural people living among wildlife to effectively benefit from it. CAMPFIRE is the mechanism created to facilitate this.

From 1989-2006, CAMPFIRE channeled more than $20 million to rural villages and $17 million to rural district councils.[66] From 2010-2015, hunting fees accounted for over $11 million in revenue, 70% of which came from elephant hunting (until the suspension reduced demand for elephant hunting), and two-thirds of which came from U.S. elephant hunters. Put differently, over $5 million accrued directly to CAMPFIRE communities from U.S. elephant hunters until the suspension reduced that amount, e.g., to 54% of hunts in 2014.[67] (Until then, 70% of CAMPFIRE revenue was generated by elephant hunts and $550,000 in trophy fees alone were generated in communal lands in 2014.[68]) These income receipts are "often understated," as economic multipliers "are not captured as part of CAMPFIRE income," and "[t]he proportion of safari operating expenses paid locally in the form of wages and salaries, and purchase of materials is often not recorded."[69]

According to the most recent audit of participating CAMPFIRE districts, "Data from 9 CAMPFIRE Districts … shows that approximately 60% of the allocated quota is utilized and that the majority of hunters (53%) originate from America. These hunters have contributed US$9 million … during the period 2010-2015 compared to US$8 million by the 40 other nations.... The income generated from trophy fees in the last 6

[64] *ZPWMA July 2015 Response*, p. 36-41, 48-51; ZPWMA, Presentation, *Legal Trade, Conservation, and Rural Livelihoods: A Zimbabwean Perspective* (Dec. 2016), p. 9-10.

[65] E.g., *CAMPFIRE Association Report*, p. 1-11; *CAMPFIRE Workshop Proceedings*, p. 6-24; CF Email to T. Van Norman attaching *CAMPFIRE Income Analysis*; CAMPFIRE Association, *The Role of Trophy Hunting of Elephant in Support of the Zimbabwe CAMPFIRE Program* (Dec. 2016), p. 12-16 ("*CAMPFIRE—Role of Hunting Report*"), publicly available at http://campfirezimbabwe.org/index.php/downloads.

[66] *CAMPFIRE Association Report*, p. 8; *CAMPFIRE—Role of Hunting Report*, p. 9-11; ZPWMA, Presentation, *Legal Trade, Conservation, and Rural Livelihoods: A Zimbabwean Perspective* (Dec. 2016), p. 19, (U.S. hunters make up 76% of CAMPFIRE clients).

[67] *CAMPFIRE Association Report*, p. 3-4; *CAMPFIRE Income Analysis*, p. 1, 6 ("it is highly probable that the decline in hunting income for 2014 was largely caused by the suspension of trophy imports by United States of America. The suspension has a lag effect on income, and preliminary calculations of earnings for 2015 indicate a further continuing decline."); *CAMPFIRE—Role of Hunting Report*, p. 9-11.

[68] *ZPWMA July 2015 Response*, p. 48, 50; *see also CAMPFIRE Workshop Proceedings*, p. 6-24.

[69] ZPWMA, Presentation, *Legal Trade, Conservation, and Rural Livelihoods: A Zimbabwean Perspective* (Dec. 2016), p. 17; *see also* p. 11-20.

years (2010 – 2015) is approximately US$11.4 million of which elephant trophy fees contributed 65%."[70] In short, U.S. elephant hunters are the critical source of funds for CAMPFIRE communities.

Hunting funds are invested in projects that benefit the communities overall: building classrooms or clinics; purchasing farm equipment; rehabilitating water supplies; purchasing vehicles used in wildlife monitoring and anti-poaching; installing solar power; and many other infrastructure improvements. CAMPFIRE links these tangible benefits for rural residents to protection of wildlife. Its infrastructure creates conservation officers and monitoring programs, and employs game scouts, which generates significant benefits for the elephant as well. This is vital because otherwise elephant are largely viewed as threats, not assets.[71]

The grant of Appropriate Authority means that ZPWMA foregoes the fees from hunting in CAMPFIRE areas, and the fees and other benefits accrue to the communities. Operators in CAMPFIRE communities contract with the district councils, and are bound to pay trophy, concession, and other fees—or more, depending on their contracts—to the councils (41%) and to the wards directly (55%). Conservation Force submitted documentation evidencing that many operators contribute much more than just fees. For example, in the Mbire District in which Mr. Jines hunted, Charlton McCallum Safaris operates a "genuine joint venture" with the Mbire district council and wards. In 2013-2015, Charlton McCallum Safaris paid over $1.05 million in fees and revenue-sharing, including over $470,000 directly into ward accounts. The district significantly benefits from this partnership, including: constructing a clinic and nurses' houses; constructing a wildlife administration office; constructing storerooms; constructing 14 classroom blocks, seven teachers' houses, and one school office; constructing and equipping of grinding mills; and constructing and equipping two hand-pump boreholes, water pipes, toilets, water storage; constructing one tourist camp; acquiring two tractors.[72] 90% of the district's income comes from hunting and ~35% of that is from elephant hunting. 90% of hunting clients are U.S. citizens. In short, at least $330,750 accrued to the Mbire district and rural communities as a result of U.S. elephant hunters in 2013-2015.[73] This is but one example. Conservation Force has submitted evidence of many more, including contributions of Lodzi Hunters and Martin Pieters Safaris, among others.[74]

The Denials do not consider the best-available information. They rely upon the Finding, which cites to old and limited data on CAMPFIRE. The best-available information demonstrating CAMPFIRE's benefits must be evaluated, and accordingly, the Denials should be reconsidered and reversed.

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[70] *CAMPFIRE—Role of Hunting Report*, p. ii.

[71] *CAMPFIRE Association Report*, p. 3-4, 7-11; *CAMPFIRE Income Analysis*, p. 1-2; *CAMPFIRE—Role of Hunting Report*, p. 9-19; ZPWMA, Presentation, *Legal Trade, Conservation, and Rural Livelihoods: A Zimbabwean Perspective* (Dec. 2016), p. 20-22. *See also CAMPFIRE—Role of Hunting Report*, p. ii (in the period 2009-2015, "96 human lives were lost to wildlife attacks, with elephant accounting for more than half of those deaths. Yet despite these challenges, communities still retain a high level of tolerance for elephants, but this support is rapidly dissipating as a result of the loss of income from trophy hunting. This places almost two million ha of land at risk, including the risk of increasing retaliatory killing through poisoning and illegal wildlife crime.").

[72] Chief Sen. D. Chisunga, *Land Use Planning at the Local Level*, Presentation at the 14th African Wildlife Consultative Forum (Nov. 10, 2015).

[73] *CF Dec. 2014 Comment*, p. 3-7 (citing Charlton McCallum Safaris, Elephant Hunting in Mbire District – A Perspective of the Private Sector (Nov. 17, 2014) & related attachments.

[74] Please see attached Index of Information Submitted.

Reason for Reconsideration 7:
Local Conservation Efforts Effectively Share the Responsibilities of Elephant Conservation

The Denials should be reconsidered because Conservation Force, ZPWMA, SOAZ, and others have provided extensive documentation of the benefits to elephant generated by "local conservation efforts." The FWS does not discuss this information specifically, but it should. This information proves that the contributions of safari operators, anti-poaching units, CAMPFIRE communities, private landholders/conservancies, and associated non-profits are integral to the functioning of Zimbabwe's wildlife management system. They are not "limited" efforts. They are extensive, and reduce the burden on ZPWMA's resources.

As Conservation Force and ZPWMA previously explained, conservation work is ***frequently*** carried out by non-governmental entities in Zimbabwe.[75] The Parks and Wildlife Act Chapter 20:14 devolved Appropriate Authority to private and communal landholders. Through this "government mechanism," the "legal right to utilize and manage wildlife on their property" was transferred to the landholders.[76] Due to this transfer, non-governmental entities such as safari operators, CAMPFIRE district councils, and private conservancies have both the authority and the obligation to protect, conserve, monitor, and benefit from wildlife in their areas.[77] As ZPWMA wrote:

> Fundamentally, ZimParks supports local efforts by providing a conducive legislative and policy environment which allows the private and community sectors to thrive. The grant of Appropriate Authority Status to private properties and Rural District councils is a case in point.[78]

ZPWMA supports local conservation efforts through training, support, and more.

The contributions of non-governmental interest to wildlife conservation are not limited or localized. Taken together, they cover the country.[79] A few examples from the information provided to the FWS are below:

- Lodzi Hunters, in the Northwest Matabeleland and Sebungwe ranges, contributed over $680,000 over two years to CAMPFIRE wards, to improve livelihoods, employ scouts, and increase tolerance of elephant and other species. The operator also maintains a twelve-person anti-poaching team.[80] Similarly, Charlton McCallum Safaris in the Zambezi Valley shares revenues with Mbire CAMPFIRE wards and the district council. In two years, the fees shared topped $750,000 (of which $380,000+

[75] *ZPWMA April 2014 Response*, p. 15-16, 23-25; *CF Oct. 2014 Comment*, p. 28 & related attachments; *see also* R. Martin, *Personal Comment: Ban on the Import of Elephant Trophies into the USA from Tanzania and Zimbabwe* (Oct. 2014), p. 6 & attachment, M. Murphree & R. Martin, *Shifting Paradigms, Policy and Processes in Conservation and Development over the Past Four Decades* (2013).

[76] *ZPWMA April 2014 Response*, p. 15-16.

[77] *ZPWMA Dec. 2014 Response*, p. 18-21 ("This arrangement [Appropriate Authority] incentivizes landowners and tenants to not only tolerate wildlife, but to conserve and promote conservation and protection of wildlife…"), p. 25-27 (identifying contributions of safari operators, NGOs, conservancies, communal areas to wildlife conservation).

[78] *ZPWMA April 2014 Response*, p. 25.

[79] Please see attached map, which shows the breadth of these "local" operations.

[80] *CF Jan. 2015 Comment* & related attachments.

went directly to ward accounts) and anti-poaching expenditures topped $150,000.[81] Each of these operators is lessening the government's burden of community support and anti-poaching patrols by committing their private resources to these purposes.

- A small operator, Pro Safaris in the Zambezi Valley, allocates 6% of its turnover for water pumping, water pan installation, and other conservation activities. Pro Safaris maintains a ten-person anti-poaching team to patrol a 40-km international border,[82] which allows ZPWMA rangers to focus on patrolling the national park instead of the Safari Area.
- The Tashinga Initiative is a non-profit in the Zambezi Valley that obtains anti-poaching equipment, coordinates anti-poaching efforts, and organized the Sebungwe elephant management planning workshop. The Tashinga Initiative is supported by local safari operators (hunting and photo), and international donors like the Houston Safari Club.[83]
- Also in the Zambezi Valley/Sebungwe range, Martin Pieters Safaris maintains three patrol teams, and are helping develop a community-owned conservancy with two additional patrol teams. The company teams have recovered 15,000+ snares since 2007, and their nearly 300 patrols support ZPWMA's monitoring in this area. The community scouts were intensively trained by the operator teams. These scouts cooperate with ZPWMA against poaching in the Omay and Gokwe communal lands.[84]
- Save and Bubye Valley Conservancies in the Southeast Lowveld range each spend over $500,000 annually on anti-poaching and invest another $200,000+ in nearby villages. The conservancies do not draw on ZPWMA resources at all. They are wholly responsible (and largely depend on hunting income) to secure a land area about the size of New Jersey, the world's third-largest black rhino population, and an elephant population that exceeds 2,000.[85]
- CAMPFIRE communities monitor poaching losses and PAC off-take. They collaborate with ZPWMA to detect poaching and have developed a mutual informer network together. They also work with ZPWMA and safari operators to avoid problem animal off-takes and non-destructively deter crop-raiding elephant.[86] Because they have Appropriate Authority, they collaborate with ZPWMA, but do not need to depend on ZPWMA for wildlife management.
- The SOAZ report included data from 14 operators across the entire elephant range. It reported on these operators' monitoring of elephant populations and poaching losses and their anti-

[81] *CF Dec. 2014 Comment*, p. 5-6 & related attachments; *CF Jan. 2015 Comment* & related attachments; CF Email to T. Van Norman forwarding DAPU film (May 9, 2016); CF Emails to T. Van Norman forwarding DAPU Reports (June 15, 2015, May 23, 2016, & Jan. 18, 2017).

[82] *Pro Safaris Report* (2016).

[83] E.g., CF Email to T. Van Norman forwarding information on anti-poaching in the Zambezi Valley and Sebungwe (Nov. 30, 2015); CF Email to T. Van Norman forwarding Tashinga Initiative press release (May 22, 2016); CF Email to T. Van Norman forwarding article on success in building new communications base (Nov. 14, 2016).

[84] Martin Pieters Safaris, *Blog Posts*, publicly available at http://www.martinpieterssafaris.com/blog/.

[85] B. du Preez et al., *Sport-Hunting and Lion (Panthera leo) Conservation in Zimbabwe* (Jan. 31, 2016); B. du Preez, *Bubye Valley Conservancy Lion Research Report* (Jan. 12, 2016); R. Groom, *Hunting in Zimbabwe's Save Valley Conservancy* (Jan. 27, 2013).

[86] *See generally CAMPFIRE Workshop Proceedings*.

poaching investment of almost $1 million in 2013. The 14 companies together employed 245 anti-poaching personnel, and cooperated closely with ZPWMA.[87]

The Finding highlights the Mana Pools elephant management planning workshop. It should also mention the Sebungwe and South East Lowveld workshops. They exemplify the public-private-communal partnership existing in Zimbabwe because stakeholders have Appropriate Authority. The Finding reveals the FWS' misunderstanding of Zimbabwe's conservation system, which requires reconsideration and reversal of the Denials.[88]

Reason for Reconsideration 8: Enhancement has been Shown

The FWS has defined "enhancement" as benefits to the species, such as protection of habitat, generation of conservation and anti-poaching funding, and reduction of human-wildlife conflicts through generation of conservation incentives. The information submitted to the FWS demonstrates that licensed, regulated hunting of elephant in Zimbabwe satisfies this standard. This information shows how hunting justifies the existence of significant elephant range.[89] It substantiates the anti-poaching partnership among ZPWMA, hunting operators, and communities, and demonstrates the success of their efforts (declining PIKE). It shows that communities are incentivized not to retaliate against elephant (low PAC offtakes). It describes the pre-suspension benefits generated for CAMPFIRE communities. The success of Zimbabwe's elephant management is underscored by the fact there are over 80,000 elephants in the country, and significant anti-poaching gains in the border area of the Zambezi Valley.

The FWS demands "enhancement." It has been shown. Sustainable offtakes have been shown. A stable elephant population has been shown. A well-managed and responsive elephant management system has been proven. The continued suspension obstructs this enhancement from reaching the elephant—and the people—of Zimbabwe. We encourage the FWS to stop moving the target. The FWS cannot continue to rely upon a Finding that ignores the facts.

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[87] *SOAZ Report*, p. 4.

[88] The Finding's first sentence is almost verbatim to the July finding, and still fails to respond to CF's objections on this point. We objected that we did not "emphasize the economic impact of the suspension to local conservation efforts," though that information was available in our submissions. The Finding's failure to respond to this objection, and its cutting-and-pasting of prior writing, merits reconsideration; it clearly does not consider the best-available and most current information. Note that the attachments in CF's comment also pointed to data showing "whether and to what extent these individuals would reduce their conservation efforts based on the inability of U.S. hunters to import a sport-hunted trophy," e.g., in the submitted Declarations, Charlton McCallum Safaris and DAPU documents, SOAZ Report, CAMPFIRE Reports, R. Martin Fourth Report, and more. E.g., *CF June 2014 Comment* Attachments; *CF Oct. 2014 Comment* Attachments.

[89] It should be noted that there is far more land secured in areas which allow, and largely rely upon, sustainable use. Compare the approximately 27,000 km^2 of habitat in national parks to the approximately 19,000 km^2 in Safari Areas, ~48,000 km^2 in CAMPFIRE areas, and 7,000+ km^2 in conservancies.

IUCN/UN, Protected Planet, http://blog.protectedplanet.net.

Given all this information, the Applicants request reconsideration, and reversal of the Denials.

Respectfully submitted,

Conservation Force
3240 S. I-10 Service Road W., Suite 200
Metairie, Louisiana 70001-6911
Phone: 504-837-1233
Fax: 504-837-1145
Email: cf@conservationforce.org

CC: Bryan Arroyo
Dr. Rosemarie Gnam

Attachments: Index
USB containing information submitted to the FWS by Conservation Force and ZPWMA
Map of “Local Conservation Efforts”

Index of Information Produced by Conservation Force, ZPWMA, and AfESG
In Support of Re-Opening Import of Sport-Hunted Elephant Trophies from Zimbabwe

Date	Producer	Document
7/2/1997	FWS	Positive enhancement finding
4/4/2014	FWS	First questionnaire to ZPWMA
4/4/2014	FWS	Negative enhancement finding
4/17/2014	FWS	Negative enhancement finding revised
4/17/2014	ZPWMA	Response to April 4, 2014 questionnaire sent to FWS, including all attachments ("ZPWMA April 2014 Response")
5/30/2014	AfESG	Email from H. Dublin to R. Gabel, subject "Clarification regarding Zimbabwe data"
6/6/2014	CF	First comment on April 2014 enhancement finding and publication in the Federal Register, including all attachments ("CF June 2014 Comment")
6/25/2014	CF	Email to T. Van Norman forwarding email from E. Chidziya/ZPWMA regarding National Elephant Management Plan Workshop
7/22/2014	FWS	Negative enhancement finding
10/4/2014	R. Martin	Personal comment and attachments sent to FWS
10/21/2014	CF	First comment on July 2014 enhancement finding, including all attachments ("CF Oct. 2014 Comment")
10/31/2014	FWS	Second questionnaire to ZPWMA
11/3/2014	AfESG	Email from H. Dublin to T. Van Norman attaching AfESG letter/ comment on July finding ("AfESG Nov. 2014 Letter")
11/13/2014	CF	Email to T. Van Norman forwarding invitation to National Elephant Management Plan Workshop
12/1/2014	CF	Email to T. Van Norman forwarding Agenda for Plan Workshop
12/5/2014	CF	Email to T. Van Norman attaching PowerPoint with survey results
12/5/2014	CF	Email to T. Van Norman summarizing outcomes of Plan Workshop
12/10/2014	ZPWMA	Response to October 31, 2014 questionnaire sent to FWS, including all attachments ("ZPWMA Dec. 2014 Response")
12/15/2014	CF	Second comment on July 2014 enhancement finding, including all attachments ("CF Dec. 2014 Comment")
12/16/2014	CF	Email to T. Van Norman forwarding CAMPFIRE Workshop proceedings
12/23/2014	CF	Email to T. Van Norman forwarding national Plan Workshop Proceedings
1/6/2015	CF	Email to T. Van Norman forwarding comments from the authors of the Save Valley Conservancy 2013 survey
1/12/2015	CF	Email to T. Van Norman forwarding invitation to Mana Pools Elephant Management Plan Workshop
1/19/2015	CF	Third comment on July 2014 enhancement finding, attaching Lodzi Hunters and Charlton McCallum Safari documents to substantiate enhancement/community investment ("CF. Jan. 2015 Comment")
1/23/2015	CF	Email to T. Van Norman with comment cover letter
3/3/2015	CF	Email to T. Van Norman forwarding article on ZPWMA anti-poaching success
3/11/2015	CF	Email to T. Van Norman attaching recent CITES/MIKE update

Index of Information Produced by Conservation Force, ZPWMA, and AfESG
In Support of Re-Opening Import of Sport-Hunted Elephant Trophies from Zimbabwe

Date	Producer	Document
3/11/2015	CF	Email to T. Van Norman forwarding invitation to rescheduled Mana Pools Elephant Management Plan Workshop
3/26/2015	FWS	Negative enhancement finding ("Finding")
4/13/2015	CF	Email to T. Van Norman forwarding article regarding effect of FWS suspension on CAMPFIRE
5/4/2015	CF	Email to T. Van Norman forwarding invitation to Sebungwe Elephant Management Plan Workshop
5/4/2015	CF	Email to T. Van Norman forwarding preparatory document for Sebungwe Workshop
5/5/2015	CF	Email to T. Van Norman forwarding study on elephant in the Sebungwe range
5/5/2015	CF	Email to T. Van Norman forwarding Mana Pools Workshop Proceedings
5/8/2015	CF	Email to T. Van Norman forwarding agenda for Sebungwe Workshop
5/11/2015	CF	Email to T. Van Norman forwarding background document on elephant populations in the Sebungwe range
5/12/2015	FWS	Third questionnaire to ZPWMA
5/14/2015	CF	Email to T. Van Norman forwarding fact sheet on Sebungwe Workshop
6/15/2015	CF	Email to T. Van Norman forwarding DAPU First-Quarter Report
7/20/2015	ZPWMA	Response to May 12, 2015 questionnaire sent to FWS, including all attachments ("ZPWMA June 2015 Response")
9/30/2015	CF	Email to T. Van Norman forwarding South East Lowveld Workshop Proceedings
11/30/2015	CF	Email to T. Van Norman forwarding A. Pole/AWF email describing Cabinet subcommittee meeting
11/30/2015	CF	Email to T. Van Norman forwarding email from L. Taylor regarding anti-poaching efforts in Sebungwe range (confidential)
12/1/2015	CF	Email to T. Van Norman forwarding analysis of income to CAMPFIRE districts from licensed, regulated hunting ("CAMPFIRE Income Analysis")
12/3/2015	CF	Email to T. Van Norman forwarding anti-poaching reports in the Mana Pools National Park area
12/7/2015	CF	Email to T. Van Norman attaching two presentations, one made by the CAMPFIRE Association and one made by Chief Chisunga of the Masoka Ward in the Mbire District
1/5/2016	CF	Email to T. Van Norman forwarding information about anti-poaching in the Zambezi Valley (confidential)
2/22/2016	CF	Email to T. Van Norman attaching article regarding ZPWMA ant-poaching success
2/24/2016	CF	Email to T. Van Norman including link to video regarding Bubye Valley Conservancy
2/29/2016	CF	Email to T. Van Norman forwarding final print of National Elephant Management Plan ("Plan")

Index of Information Produced by Conservation Force, ZPWMA, and AfESG
In Support of Re-Opening Import of Sport-Hunted Elephant Trophies from Zimbabwe

Date	Producer	Document
4/20/2016	CF	M. Pieters Blog Posts
4/20/2016	CF	Pro Safaris Report
4/20/2016	CF	B. du Preez, Bubye Valley Conservancy Lion Research Report
4/20/2016	CF	R. Groom, Hunting in Zimbabwe's Save Valley Conservancy
4/20/2016	CF	B. du Preez et al., Sport-Hunting and Lion (*Panthera leo*) Conservation in Zimbabwe
4/25/2016	CF	Email to T. Van Norman attaching article "Muchinguri speaks on Tsholotsho Jumbo ban"
5/2/2016	CF	Email to T. Van Norman attaching article on continued losses in Zimbabwe's hunting sector due to the FWS suspension
5/9/2016	CF	Email to T. Van Norman including link to video describing Charlton McCallum Safaris/DAPU's anti-poaching successes
5/9/2016	ZPWMA	Email to T. Van Norman attaching letter explaining use of elephant hunting funds
5/22/2016	CF	Email to T. Van Norman attaching press release for Houston Safari Club grant to the Tashinga Initiative
5/23/2016	CF	Email to T. Van Norman forwarding DAPU's First Quarter Report
7/18/2016	CF	Email to T. Van Norman forwarding email from D. Cumming confirming "go-ahead" to prepare Supplemental Plan
7/19/2016	CF	Email to T. Van Norman forwarding Mana Pools MIKES site information
9/19/2016	CF	Email to T. Van Norman forwarding article about CAMPFIRE review
9/2016	AfESG	AfESG African Elephant Status Report 2016
11/9/2016	ZPWMA	Email to T. Van Norman attaching requested Plan prioritization and Supplemental Plan
11/14/2016	CF	Email to T. Van Norman forwarding article describing anti-poaching efforts by the Tashinga Initiative in the Zambezi Valley
12/27/2016	CF	Email to T. Van Norman forwarding presentation by ZPWMA Elephant Coordinator
1/18/2017	CF	Email to T. Van Norman forwarding DAPU End-of-Year Report
2/1/2017	CF	Email forwarding anti-poaching report reflecting implementation of the Mana Pools/Zambezi Valley regional elephant management plan
3/6/2017	CF	Email forwarding status of Zimbabwe responses to FWS requests
4/6/2017	CF	CAMPFIRE Association, The Role of Trophy Hunting of Elephant in Support of the Zimbabwe CAMPFIRE Program
4/6/2017	CF	CITES/MIKE, Levels and Trends of Illegal Killing of Elephants in Africa to 31 December 2016

Note: This list is not and is not intended to be a complete record of the FWS' Zimbabwe elephant file. The FWS undoubtedly received information not listed here, including at least two information productions by Safari Club International. We believe that the FWS has received direct communications from applicants for import permits, safari hunting operators, ZPWMA, and others.

ATTACHMENT

Letter Denying Request for Reconsideration

United States Department of the Interior

FISH AND WILDLIFE SERVICE

International Affairs
5275 Leesburg Pike, MS: IA
Falls Church, VA 22041-3803

MAY 16 2017

In Reply Refer To:
FWS/AIA/DMA/PRT– 04846C

Mr. Richard (b) Bonander
(b) (6)
Casper, Wyoming (b) (6)

Dear Mr. Bonander:

This letter responds to your April 6, 2017, letter from your representative, John J. Jackson, III, requesting reconsideration of the February 23, 2017, decision to deny your application for a permit to import a personal sport-hunted African elephant (*Loxodonta africana*) trophy taken on March 21, 2015, in Zimbabwe. After a thorough review of Mr. Jackson's response on your behalf, it is my decision to uphold the original denial of your application.

As you know, the African elephant is listed as threatened with a special rule under Section 4(d) of the U.S. Endangered Species Act (Act)[1]. Under the special rule, issuance of an import permit for a sport-hunted trophy can only occur if the U.S. Fish and Wildlife Service (Service) finds that the killing of the trophy animal would enhance the survival of the species, and the trophy is accompanied by a threatened species permit. To enhance the survival of the species, the importation must be associated with activities that provide a direct or indirect benefit to the species in the wild.

At the time you originally applied for a permit, the Service had reviewed the best available scientific and management data, including information made available to the Service by Zimbabwe Parks & Wildlife Management Authority (ZPWMA), Conservation Force, and Safari Club International, in evaluating the status of Zimbabwe's elephant management program at the time you conducted your hunt. Based on this material, the Division of Management Authority (DMA) made a finding on March 26, 2015, that we were unable to find that the import of an elephant trophy taken during the 2015 hunting season would meet the requirements of the Act and the special rule for African elephant. Mr. Jackson's April 6, 2017, letter asked that the Service reconsider your application, in part, based on his assertion that the enhancement finding failed to consider significant information submitted by Conservation Force, ZPWMA, and others, both before and after the finding was made, that would lead to a reversal of the Service's negative finding.

Regarding Mr. Jackson's assertion that the Service failed to consider significant information submitted by Conservation Force and ZPWMA when making its determination, the Service has taken into consideration all of the information available to the Service regarding elephant hunting

1 The text of this Act can be found by using the search bar at the top of the following web page: http://Go.USA.Gov/xr6dd.

in Zimbabwe at the time your hunt occurred (March 21, 2015). While Mr. Jackson's request for reconsideration included additional information that was not available to the Service at the time the March 26, 2015, finding was made, most of the information documented activities and actions that occurred after the conclusion of your hunt. While this new information may be relevant to hunts that occurred after our March 26, 2015 finding, it does not demonstrate that the situation in Zimbabwe, at the time of your hunt, was different than previously considered by the Service and would result in a revision of the March 2015 finding. Therefore, I am upholding the original denial of your application.

As provided in 50 CFR 13.29(e)[2], you may appeal to the Director of the Fish and Wildlife Service, through this office: Division of Management Authority, Branch of Permits, MS: IA, 5275 Leesburg Pike, Falls Church, Virginia 22041-3803. This appeal must be in writing with the original signature of the person requesting an appeal or of that person's legal representative, should refer to your file number, PRT-04846C, and must be submitted to this office within 45 calendar days of the date of this letter. The appeal must state the reason(s) and issue(s) upon which the appeal is based. Your written appeal must address how the decision to deny the reconsideration of your request was based on a misinterpretation of the information provided in your request for reconsideration, or it must present a clarification of this information. **Should you supply new information that changes the content of your original request for reconsideration, you must submit a new application to this office before such information can be considered.**

If you have any questions, please contact Supervisory Policy Specialist Michael S. Moore of this office: Division of Management Authority, Branch or Permits, MS:IA, 5275 Leesburg Pike, Falls Church, VA 22041-3803 (703-358-2104, ext. 1983).

Sincerely,

Craig Hoover, Chief
Division of Management Authority

2 The text of this regulation can be found by using the search bar at the top of the following web page: http://Go.USA.Gov/xYDUk

ATTACHMENT

March 26, 2015 Negative Enhancement Finding

United States Department of the Interior

FISH AND WILDLIFE SERVICE
Washington, D.C. 20240

In Reply Refer To:
FWS/AIA/DMA

Memorandum

To: The File

From: Chief, Branch of Permits

Date: MAR 26 2015

Subject: Enhancement Finding for African Elephants Taken as Sport-hunted Trophies in Zimbabwe On or After January 1, 2015.

The African Elephant (*Loxodonta africana*) is listed as threatened under the U.S. Endangered Species Act (ESA) and is regulated under an ESA section 4(d) special rule [50 CFR 17.40(e)]. The 4(d) special rule gives the requirements for the import of sport-hunted trophies. Under paragraph 17.40(e)(3)(iii)(C), in order for the U.S. Fish and Wildlife Service (Service) to authorize the import of a sport-hunted elephant trophy, the Service must make a finding that the killing of the animal whose trophy is intended for import would enhance the survival of the species in the wild. In evaluating the available data on elephant hunting in Zimbabwe, the Service has determined that it is unable to make a finding that the killing of elephants in Zimbabwe, on or after January 1, 2015, whose trophies are intended for importation into the United States, would enhance the survival of the African elephant in the wild. Therefore, the trophies, part or products, of elephants taken in Zimbabwe during the 2015 hunting season and future hunting seasons, will not be allowed to be imported into the United States. The suspension on importation of trophies taken during calendar year 2015 or future hunting seasons 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.

General considerations:

As stated in previous findings, in evaluating whether the killing of the animal whose sport-hunted trophy is intended for import into the United States contributes to the enhancement of African elephants within a country, the Service looks at a number of factors. We evaluate whether a country has a valid national or regional management plan and if the country has the resources and political will to enact the plan. If there is a plan, what government entities

implement the plan and how often is it reviewed and updated? Does the plan have clear, achievable objectives? Are the objectives measurable and are they being achieved? Is there an adaptive management approach within the plan so that enacting agencies can quickly respond to changing environmental or social issues?

The Service also evaluates the status of the elephant population within a country and trends over time. Particularly, we are interested in population numbers, sex and age-class distribution, and mortality rates (both natural and human-induced). Are standardized surveys being conducted and, if so, what are the timing, census methodology, and coverage? Since elephant populations can move across international borders, what level of cooperation is there between neighboring countries in management and surveying efforts for shared populations? How is poaching accounted for within survey efforts?

The Service takes into account all forms of offtake when evaluating population viability and sustainability, including human-elephant conflicts, problem animal control, poaching, and sport-hunting. While recognizing that there may be limited resources available for elephant management, the Service considers what national policies are in place to address human-elephant conflicts and problem elephant control. Is there a policy on culling surplus animals and removal of nuisance animals? Does domestic harvesting of elephants occur for local consumption or use? The amount of protected area either set aside for elephants or managed for elephant populations and the level of protection provided are also important in the Service's evaluation of whether imports of trophies could be authorized.

Finally, the Service considers the country's sport-hunting program and whether it contributes to the conservation and management of the species. Is the hunting program scientifically based and has it been incorporated into national/regional management strategies, particularly in light of data on population numbers and trends and levels of utilization (both legal and illegal)? Are the funds generated by hunters going directly to in-situ conservation and management efforts or deposited into a general treasury fund? How are hunting quotas distributed? If there are concession areas, how are they managed and allocated? Do U.S. hunters, through their participation in the hunting program, contribute sufficient funds to address management needs of the species, and are those funds utilized in a meaningful manner?

In short, the Service is looking to determine if a country has sufficient numbers of elephants to support a hunting program, if the country has a management plan and adequate laws and regulations to effectively implement a hunting program, and if the participation of U.S. hunters in the program provides a clear benefit to the species to meet the requirements for the import of sport-hunted trophies under paragraph 17.40(e)(3)(iii)(C).

Basis for Finding for Zimbabwe:

In the April 4, 2014, finding, and the revised finding of April 17, 2014, the Service stated that it was unable to make a positive finding to allow imports, primarily due to the limited information available to the Service at that time. On April 4, 2014, the Fish and Wildlife Service sent a letter

to the Zimbabwe Parks & Wildlife Management Authority (ZPWMA) with a series of questions that would assist the Service in making a final determination on trophy imports. On April 14, 2014, the Director-General of ZPWMA sent a letter to the Service expressing concerns over our decision to establish a temporary suspension. On April 17, 2014, the Director-General sent a response to the Service inquiry. Several weeks later, the Service received a number of documents, including copies of Zimbabwean laws, and other items referenced in the ZPWMA response. In addition, on June 6, 2014, the Service received additional information from Conservation Force, a U.S.-based conservation and hunting non-governmental organization (NGO). In its July 17, 2014 finding, as revised on July 22, 2014, the Service stated that it continued to be unable to make a positive finding to allow imports. Since that time, the Service has received a number of comments from individuals and associations connected to the hunting industry in Zimbabwe or southern Africa. On October 21, 2014, the Service received additional comments from Conservation Force. Further information was provided by Conservation Force on January 19, 2015. After reviewing this information, the Service delivered a second letter, dated October 31, 2014, to ZPWMA while attending the 13th Annual African Wildlife Consultative Forum in Ethiopia. This letter requested clarification of information submitted to the Service, and also requested additional information to address questions that were raised from our review of available information. The Service received a response to this inquiry on December 10, 2014. Safari Club International also provided supplemental information on December 17, 2014, and January 23, 2015. This finding is the result of an analysis of all of this information. Based on the information available to the Service, we are unable to make a finding that the killing of elephants in Zimbabwe, on or after January 1, 2015, whose trophies are intended for importation into the United States, would enhance the survival of the African elephant in the wild. As noted above, the suspension on importation of trophies taken during calendar year 2015 or future hunting seasons could be lifted if additional information on the status and management of elephants in Zimbabwe becomes available which satisfies the conditions of the 4(d) special rule under the ESA.

Management Plans: In its April 4, 2014, letter, the Service asked whether Zimbabwe had a current national management plan for elephants. In the ZPWMA response, Zimbabwe responded that the "management plan" consisted primarily of The Policy and Plan for Elephant Management in Zimbabwe (1997) and Elephant Management in Zimbabwe, third edition (July 1996). In addition, ZPWMA stated that they also implement other plans: "The African Elephant Action Plan" (CoP15 Inf. 68), SADC Protocol on Wildlife, and Elephant and Rhino Security Plan. In the ZPWMA response, ZPWMA stated that all of the protected areas in Zimbabwe have "specific aspects of elephant monitoring programs that are implemented and reviewed on an annual basis". ZPWMA stated that information on the status of the elephant is derived from aerial surveys, water hole counts, walking transects, visitor observation, and ranger-based monitoring. In addition, ZPWMA stated that they are regularly monitoring the status of the elephant population, including poaching, at two sites through the CITES "Monitoring the Illegal Killing of Elephants" (MIKE) program.

According to their initial response, ZPWMA is the sole legal authority, under the terms of the Parks and Wildlife Act, Chapter 20:14, for administering the management plans and overall

management of elephants in Zimbabwe. Through an adaptive management approach, ZPWMA stated that aspects of the elephant management plan are "reviewed through annual stakeholder consultative national workshops" with government, NGO, local community, safari operator, and private sector participation.

Elephant Management in Zimbabwe provides a historical review of elephant status in Zimbabwe prior to 1996. The document also identifies three major management goals for ZPWMA: maintain at least four demographically and genetically viable populations; maintain numbers and densities below levels that will not compromise biodiversity; and maintain or increase elephant range at or above 1996 levels. However, the document primarily focuses on intentional reduction of elephant populations through culling rather than on maintenance or increase of populations under threat. While the Service recognizes the potential role of culling as part of a management program, Elephant Management in Zimbabwe is largely irrelevant since it does not establish specific measurables or management actions that need to be taken. Instead, it largely presents a philosophical discussion of the merits of culling and efforts that must be taken to ensure that culls meet the desired management results. The document did make one relevant statement that when managing elephant males for sport hunting, it is essential to account for all adult males removed from a population, including animals taken through problem animal control and poaching. The document goes on to state that the "sport hunting quota should be reduced, to zero if necessary, if more than 0.75% of the populations [per annum] is being killed in other ways."

The Policy and Plan for Elephant Management in Zimbabwe was the outcome of a "Zimbabwe Elephant Management Framework" workshop held on January 13, 1997, in Harare. The document summarizes the issues that were affecting elephant populations in Zimbabwe at the time, and recommended policy statements on elephant management. While the document states a clear goal and establishes ten objectives with management actions identified, it does not sufficiently expand on any methodology to meet the objectives or complete management actions. Without a plan to take specific actions to meet the objectives, or at least a clear framework on how adaptive management efforts would be monitored to ensure that they are meeting the stated objectives, it is not clear to the Service how this document could serve as a "management plan". Given the general nature of the stated objectives, it could be stated that the objectives and, possibly, the management actions of this 1997 document are still valid, but without specific measurable outcomes identified to implement these goals and actions, the document is insufficient to address the management of elephants. Further, while the material received from Conservation Force and the ZPWMA in response to the Service's April 4, 2014, and October 31, 2014, inquiries provided some information related to the objectives, the Service has not received sufficient information to indicate, since the inception of this document in 1997, which objectives are being met or how they are being met.

Other documents provided by ZPWMA in response to our inquiries, e.g. "The African Elephant Action Plan" (CoP15 Inf. 68), SADC Protocol on Wildlife, and Elephant and Rhino Security Plan also establish broad policy goals and objectives, but provide very little with regard to specific management actions or measurables. At a December 2014, three-day workshop, hosted by ZPWMA, to review Zimbabwe's Elephant Conservation Policy and Management Plan, the participants discussed the SADC Protocol, which went into effect in 2003. According to the

information from this workshop, the participants felt that the protocol was a good framework for Southern African countries to work together on law enforcement and anti-poaching efforts. It is not clear, however, how successful Zimbabwe has been in implementing this protocol (limited information has been provided supporting or refuting Zimbabwe's implementation of the Plan). The Zimbabwe Policy for Wild Life is a general framework, published in November 2000, on how ZPWMA would be managed to ensure that Zimbabwe's wildlife and their habitats are appropriately managed. This document specifically acknowledges that "[I]t is intended that [this] policy will be followed by detailed management plans and enabling legislation for those issues which merit them." It is not clear if detailed management plans for elephants have not been developed because ZPWMA does not believe that elephants merit such plans, or if detailed plans have been developed, but were not provided to the Service.

Finally, the National Environmental Policy and Strategies, published in June 2009, is a general policy framework for all environmental issues in Zimbabwe. The document, while addressing ways to maintain environmental integrity, social issues, economic issues, and environmental management, establishes "guiding principles" and "strategic directions" for addressing biodiversity (Guiding Principle #9 and 10), flora (#11 and 12), fauna (#13), genetic resources (#14), protected areas(#15), natural resource management (#43), and wildlife and fisheries (#45). However, these guiding principles and corresponding strategic directions are only broad guidance and do not identify any specific management activities.

Without a management plan or plans, or other guiding document, with specific, measurable goals and actions, it is very difficult for the Service to determine if ZPWMA is implementing the well-articulated, but general, goals and objectives that appear in Elephant Management in Zimbabwe, The Policy and Plan for Elephant Management in Zimbabwe, and other Zimbabwean policy documents. It should also be noted that both elephant management plans are more than 15 years old.

In several documents available to the Service, ZPWMA stated that they do not have a proscriptive management plan because they utilize an adaptive management approach to elephant conservation and management. However, no information has been provided that indicates how this adaptive management approach is carried out. While the Service acknowledges the value of such an approach generally, a clear framework or guidance would be necessary to ensure consistent implementation on a national basis. Even if the documents mentioned above were the overarching guidance for the country and adaptive management was carried out independently for each of the four subpopulations (North West Matabeleland, Zambezi Valley, Sebungwe, and Gonarezhou (or South-East Lowveld)), it would stand to reason that each subpopulation would need guidance that is more specific. In both of the ZPWMA responses to the Service, they spoke of "devolving wildlife management authority to local branches, private conservancies, and CAMPFIRE's RDC [rural development councils]". The Service does not disagree with a regional or local management approach, however, since the Service has been informed that elephants in Zimbabwe are managed at a national level, there needs to be a national approach and understanding of the basis of this adaptive management and that the country, as a whole, is taking a logical, scientifically based approach to reaching the agreed upon end result.

In December 2014, ZPWMA hosted a three-day workshop at Hwange Safari Lodge in Zimbabwe to review Zimbabwe's Elephant Conservation Policy and Management Plan. The workshop was attended by the ZPWMA Director General, the Permanent Secretary for Environment, Water and Climate, members of the Zimbabwe Parks and Wildlife Board, Executive Directors of Rural District Councils, and various NGOs. Both the Permanent Secretary and the Director General acknowledged at the workshop that the 1997 management plan was outdated and has been overtaken by events at the global, regional, and local level and cannot address current challenges.

The workshop participants agreed on a framework for the upcoming management plan. The proposed revised management plan has the same long-term vision of the 1997 plan and basically the same target goals (i.e., maintain at least 4 demographically and genetically viable populations; maintain or increase elephant range; maintain numbers/densities of elephants at levels that do not adversely impact biodiversity conservation goals while contributing to economically viable and sustainable wildlife-based land uses). The workshop participants identified the beginnings of strategic objectives and outputs, as well as some key activities. The outcome of the workshop appears to be a starting point for reevaluating the current management plan(s). However, according to the Proceedings, there was insufficient time at the workshop to complete the section on means of verifying the key performance indicators. A schedule was agreed upon: by Dec. 15, 2014, ZPWMA would appoint a drafting team to write up the management plan; the 1st draft of the plan would be ready by Jan. 30, 2015; the Elephant Management Plan Coordinating Committee would be convened by ZPWMA by Feb. 28, 2015; Final draft of management plan by April 30, 2015; and Operational annual management plans for 4 sub-regions by May 30, 2015.

Overall, ZPWMA has not provided, and the Service has not otherwise received, any information regarding the 2014 or future hunting seasons that indicates that Zimbabwe is implementing appropriate management of the national elephant population. While the Service does not have adequate information to conclude that the current management regime is sufficient to meet the criteria under 50 CFR 17.40(e)(3)(iii)(C), a revised national plan that includes specific goals and measures with specific actions to be taken is a necessary first step towards a re-evaluation of this finding in the future.

Population Status: To manage any population to ensure an appropriate population level and determine whether sport-hunting is having a positive effect, it is vital to have sufficient data on population numbers and population trends to base management decisions. Elephant Management in Zimbabwe states that sport-hunting quotas should be reduced or eliminated if the overall offtake of male elephants, from all sources, is greater than 0.75% of the total population per annum. Without current population data, it is not clear how one can calculate the number to offtake. Without information on population demography and mortality, it is not possible to determine accurately what impact hunting, in conjunction with other offtakes, including problem animal control and poaching, is having on Zimbabwe's elephant population. However, Rowan Martin, author of this document, stated in comments submitted to the Service that he wished he could "disavow one's own writing". Dr. Martin stated that "It [the document] is correct in saying that close attention should be paid to problem animal control and illegal hunting…[but] my current thinking is that trophy hunting should continue regardless and the management thrust should be on reducing illegal hunting and problem animal control. A well-functioning trophy hunting industry

could be the one factor that reduces number of elephants killed illegally and as problem animals." While the Service agrees that a well-functioning hunting industry can provide financial benefits, we also believe that a clear understanding of all off-take is necessary and hunting should not continue without adequate population data.

At the time the Service made its April and July 2014 findings, we relied heavily on population information in the IUCN SSC African Elephant Database report "2013 Africa". According to this this report, the elephant population in Zimbabwe in 2007 was estimated to be 99,107, of which 85% (84,416) was classified as "definite", although less than 1% of these animals were identified by aerial or direct counts, and only 0.3% (291) was classified as "speculative". While the total population in 2012 was estimated at 100,291, only 47% (47,366) was classified as "definite" and 45% (45,375) was classified as "speculative". Only 304 "definite" animals were counted by aerial or ground counts (less than 1% of the definite animals), while 41,840 of these animals were counted through sample counts or dung counts, a less accurate methodology than properly conducted aerial surveys, and the remaining 5,222 were estimated through "other guesses". According to this report, 23 of 40 population estimates included in 2012 are older than 10 years, undermining the quality of the data. Further, according to the report, only eight of the 40 estimates used in the "2013 Africa" report were the result of repeated surveys. As noted in that report, "this lack of systematic and updated monitoring data is of serious concern for possibly the third largest elephant population in Africa." However, in a November 3, 2014, letter to the Service, the IUCN/SSC African Elephant Special Group stated that data had been inadvertently left out of the 2013 provisional report. Specifically, a 2007 survey of Hwange National Park was left off, although it was recorded under "New Surveys" on their website. The results of this survey would have added an additional 30,000 elephants to the "definite" category (from the "speculative" category), while not changing the overall population estimate. Nonetheless, the majority of surveys that contributed to the overall population estimate of 100,291 were more than 10 years old. Given the current circumstances in Zimbabwe and across the continent (e.g., poaching, habitat loss, human population expansion), this information is outdated and cannot be relied upon to show the current status of elephants.

In 2012-2013, according to information provided by ZPWMA, two surveys were conducted in Save Valley Conservancy and in Gonarezhou National Park (and surrounding areas). In Aerial Survey of the Larger Herbivores, Save Valley Conservancy, Zimbabwe, a report compiled in September 2013 by the Technical Advisory Committee of the Save Valley Conservancy, 1,538 elephants were counted. Based on nine years of aerial surveys (2004-2010 and 2012-2013), not all of which covered all of the Save Valley Conservancy, there does appear to be a short-term increase in elephant population density of 9.5%. However, trend analysis of the last three aerial surveys indicated only a 2.2% population increase in elephants. Further, the 2012-2013 surveys were only partial surveys and conditions were such that some double counting may have occurred.

In October 2013, additional aerial surveys were conducted in Gonarezhou National Park, Malapati Safari Area, and adjacent communal lands. From these surveys, it was estimated that there were 10,151 elephants in the Gonarezhou National Park area, the highest estimate since sample surveys began there in 1975. The estimated total number of elephant carcasses in the entire survey was 513. The "1+2" carcass ratio (fresh carcasses (category 1) and recent carcasses (category 2)),

however, was 0.39% in the entire survey area. The Service recognizes that the apparent elephant population increase in Gonarezhou National Park is excellent news. However, a carcass ratio of less than 4%, which is the expected carcass level due to natural mortality alone, is low. This low number could be an indication that the aerial survey method did not accurately detect all carcasses.

In 2014, the Pan African Aerial Elephant Survey (http://www.greatelephantcensus.com/) was carried out over a significant portion of the elephant's range in Africa. Preliminary results from the Pan African survey report a provisional estimate for elephant abundance in Zimbabwe to be between 82,000 and 83,000 individuals. This represents a 6% decline since 2001 surveys. This decline in elephant abundance is important when compared to 5% increase in elephant abundance per annum during the time period immediately prior to the 2001 survey. This overall downward decline in elephant abundance in Zimbabwe is troubling, as an example if elephant abundance in Zimbabwe was predicted to be 99,107 in 2007 and had a constant growth rate of 5% per annum, the Zimbabwe population would be predicted to exceed 139,454 by 2014.

Figures presented at the 16th Meeting of the Conference of the Parties to the Convention on International Trade in Endangered Species of Wild Fauna and Flora in Bangkok, Thailand, March 3-14, 2013 (CoP16 Doc. 53.1) indicated that, during 2002 – 2010, the percentage of illegally killed elephants (PIKE) in the Chewore area (Mana Pools and Chewore Safari Park) Zimbabwe was circa .24, whereas in 2011 that number jumped to .67. A PIKE level of 0.5 or higher (half or more of all carcasses were the result of illegally killed elephants) means that the elephant population is very likely to be in net decline. At the 65th meeting of the Standing Committee, updated PIKE data were provided for Zimbabwe (SC65 Inf.1). PIKE numbers from the two MIKE sites in Zimbabwe showed an increase in 2012 to 0.79 (out of 43 carcasses found) and 0.27 (out of 52 carcasses found). In 2013, the PIKE rates reported for the same two sites were 0.4 (91 carcasses found) and 0.22 (36 carcasses found). From these data, it appears that there was an increase in elephant poaching in 2012, but the poaching level might have declined in 2013 to below the 2011 level. According to the preliminary results from the Pan African Aerial Survey, carcass counts in Mid Zambezi Valley were estimated at 553 (4.3% of live population); Sebungwe had an estimated 1,424 (28.2%). North West Matabeleland was estimated at 4,087 (7.6%) and Gonarezhou National Park at 523 (4.6%) carcasses. There are no estimates available as to the proportion of these carcasses that were the result of poaching.

Regulations and Enforcement: The regulatory mechanisms for ZPWMA and its programs have been established under the Parks and Wild Life Act. This law includes sections on virtually every aspect of ZPWMA, including requirements for annual financial audits and reporting to the central government. The law also provides for substantial penalties for the unlawful possession of or trading in ivory. The first offense carries a minimum of 5 years and a maximum of 15 years in prison. The second offense carries a minimum prison term of 7 years and a maximum of 15 years. However, according to the response from ZPWMA to our April 4, 2014, inquiry, the General Laws Amendment Act (No. 5) of 2010 provides for a mandatory imprisonment of not less than nine years for poaching. If properly enforced, it appears these penalties would be a sufficient deterrent to poaching. However, we did not receive any information on the number of poaching crimes that are prosecuted nor the average sentence or penalty.

In January 1996, the Government of Zimbabwe approved the establishment of the Parks and Wild Life Conservation Fund, a statutory "Fund" that provides for financing wildlife operations directly from revenues generated through wildlife related activities. However, only revenues generated through sport-hunting conducted on state and private lands are used to finance ZPWMA; to our knowledge, no other government funding is provided, and only limited outside funding from NGOs or other governments appears to be available. The 1997 CITES Panel of Experts raised concerns as to the status of ZPWMA relating to its weak financial base, lack of management skills, inadequate and old equipment, and poor infrastructure. While the concerns raised by the Panel of Experts are dated, no new information was provided by ZPWMA or other sources regarding these concerns in response to the Service's April 4, 2014, inquiry.

Based on their December 10, 2014, letter, ZPWMA has a current operating budget in excess of US$28 million. In 2013, ZPWMA reported having revenues of US$29 million against expenditures of US$26 million. According to the letter, "...except for activities like game water supplies in Hwange NP and aerial surveys, there is no budget specifically to manage elephant because ZimParks takes a holistic approach to conservation of all wildlife resources including elephants." ZPWMA also stated that elephant hunting contributes in excess of US$14 million annually and that approximately 30% of ZPWMA's revenue is from hunting, of which the elephant is the major contributor. Besides these statements, however, we do not have adequate information about how much money is generated by elephant hunting, how these funds are distributed, or how these funds impact the ability of ZPWMA to adequately enforce the Parks and Wild Life Act, day-to-day management, or anti-poaching efforts.

That being stated, the Service received documents written by Rowan B. Martin entitled "Ban on Import of Elephant Trophies into the USA from Tanzania and Zimbabwe: Costs of Protection of Elephant Areas." The undated documents discussed the budget requirements for protecting wildlife areas in Zimbabwe based on calculations developed by Mr. Martin in 1996 and 2004. The documents stated that for Zimbabwe, given the total elephant range within the areas controlled by ZPWMA, the annual budget required to protect the elephant range would be US$21 million. In 2013, ZPWMA requested $28 million from the Treasury, the major part of which was intended for anti-poaching efforts. They were allocated only $1.5 million. According to Martin, this amount, along with the revenue from trophy hunting licenses, is not sufficient to provide the needed level of protection for land under ZPWMA's authority. However, in their December 10, 2014, letter, ZPWMA stated that they did not accept Dr. Martin's evaluation and did not consider it accurate. Dr. Martin also presented at the December workshop on this issue. According to the proceedings from the workshop, Dr. Martin suggested that ZPWMA would need US$5,275,480 to protect the National Parks, US$7,055,268 to protect safari areas, and US$3,891,536 for forest areas annually. In addition, communal lands would need US$6,101,101 and private land $3,826,770. Since we have not received a communication from ZPWMA since their December 10, 2014, letter, it is unclear if they agree or disagree with these numbers.

In evaluating the resources available to ZPWMA and their ability to implement regulations and enforcement, we also considered documents from recent Meetings of the Conference of the Parties to CITES. At the 15th Meeting of the Conference of the Parties to CITES, a report on the Elephant Trade Information System (ETIS) was presented (CoP15 Doc. 44.1 Annex). In the report,

Zimbabwe was specifically identified with regard to illicit ivory trade. The report noted the existence of organized criminal activities within Zimbabwe, including reports of the involvement of politicians, military personnel, and Chinese nationals in illicit wildlife trade. The report goes on to state that the law enforcement effort ratio within the countries grouped for the analysis had dropped to 40%, a decline of 4% from the CoP14 analysis. This decline indicates a less than average performance and was attributed to the situation in Zimbabwe.

At the 16th Meeting of the Conference of the Parties to CITES, the report on ETIS (CoP16 Doc. 53.2.2) expressed concerns about Zimbabwe with regard to illegal trade in ivory. The report stated that, as a group, Zimbabwe, Botswana, and Namibia were in the middle range, when compared to 64 other consumer or producer countries of elephant ivory, in terms of the mean number of seizures identified, but ranked fifth in the measure of scale, indicating that most of the seizures were in the 10-100 kg class (i.e., an average number of seizures that were predominately smaller in size). The report noted that 65% of the ivory trade between 2006 and 2011 had occurred since 2009, indicating that illegal ivory trade is increasing. Governance indicators were mixed, with a much lower than average World Bank "rule of law" score, but the second highest law enforcement ratio of any group of countries evaluated. The report, however, supports the Service's governance concerns by specifically identifying Zimbabwe as pulling these scores down in both cases, "especially in the 'rule of law' score, indicating that far greater challenges exist in that country." The report also noted that Zimbabwe was the source of nearly two tons of worked ivory seized in Cape Town, South Africa, in 2009.

In several letters sent to the Service by Zimbabwean safari outfitters and hunting guide organizations, it was stated many times that the presence of hunters, specifically U.S. hunters since they appear to make up the vast majority of sport-hunters in Zimbabwe, and subsequently the professional hunters and safari outfitters guiding the hunters, are the major deterrent to poaching in Zimbabwe. Several specific incidents were reported where safari outfitters and hunters, and not the ZPWMA rangers, thwarted poachers. In at least one incident, the 2013 Hwange National Park poisoning, it was reported that the safari outfitter paid for all of the anti-poaching efforts, including paying for all transportation for the ZPWMA rangers and feeding them. We would expect that the presence of anyone in the field, particularly armed hunters, could deter poachers from carrying out illegal activities where the likelihood of being captured is heightened. However, no evidence was presented to the Service that supports the belief that, without hunters, specifically U.S. elephant hunters, poaching in Zimbabwe would significantly increase. Based on the information provided, we believe that it is not likely that legal hunting for elephants or other wildlife is widespread enough or at a high enough density level to reduce significantly poaching levels in and of itself. This is particularly true for national parks, where hunting is not allowed.

Various statements about trophy hunters and outfitters being a major deterrent to poaching raise concern about existing ZPWMA funding levels and funding utilization. First, concerns center on the ability of ZPWMA to generate sufficient funds to support adequately their stated mission. Secondly, there is concern about ZPWMA's ability to utilize existing funding to support on-going activities. Without additional information on ZPWMA's funding sources (or income) and operating expenses, the Service is unable to determine if Zimbabwe has adequate resources to

enforce existing laws and regulations.

Even with the revised December 10, 2014, information regarding the current ZPWMA budget, we continue to lack sufficient information regarding funding levels or any indication that the financial base, management skills, equipment, or infrastructure have improved. It is possible, of course, that recent and upcoming events, such as the Hwange meeting in December 2014 and other meetings scheduled for early 2015, may lead to a clearer understanding of funding levels and the utilization of ZPWMA revenue. As noted previously, the Service can re-evaluate this finding, and the suspension on importation of trophies taken during calendar year 2015 or future hunting seasons could be lifted, if additional information on the status and management of elephants in Zimbabwe becomes available which satisfies the conditions of the 4(d) special rule under the ESA.

Sustainable Use: We have not been provided with adequate information regarding offtake in Zimbabwe, including basic fundamental information like the number of elephants that have been sport-hunted annually and the number of elephants that have been legally killed for the hide trade. For both the 2014 and 2015 hunting seasons (January – December), Zimbabwe has established an annual export quota of 500 elephants (1000 tusks). This is the same quota that Zimbabwe has reported to the CITES Secretariat since 2004. According to available information, it does not appear that Zimbabwe actually fills this quota each year, but due to variation in how trophies are categorized in CITES trade data, it is difficult to categorically identify the actual numbers of hunted elephants that are exported each year. Information provided by ZPWMA in response to our April 4, 2014, inquiry did not identify the number of trophies exported annually. Several statements from safari outfitters indicated that approximately 160 elephants are taken annually, but this number is not supported by any documentation.

ZPWMA categorizes offtake into six categories: Cropping (hunting and population control, which may include meat supply to rural communities and live animals to breeders), Natural Mortality (found dead of natural causes), Accidents (killed by trains, landmines, or vehicles), Poaching (illegal take), Problem Animals (elephants killed to protect human life and property), and Management Offtake (offtake due to other management decisions). No information was given on the number of elephants that are taken in each of these categories. It does not appear that Zimbabwe is currently conducting any culling operations, besides trophy hunting if considered a "cull".

According to information from ZPWMA, 293 elephants were poached in 2013, including the 105 elephants poisoned in Hwange National Park.[1] Of the five years of data ZPWMA provided in their April 17, 2014, response, an average of 190 elephants were identified as being poached annually. In 2009 and 2010, there was an average of 111 elephants poached; however, between 2011 and 2013, the average more than doubled to 243 elephants. It is not clear what stimulated this significant increase. Many countries have experienced a marked increase in poaching, due to the increase in demand for ivory. It is also possible that shifts in land tenure, governance,

[1] In our April 4, 2014, finding, we incorrectly stated that over 300 elephants had been poisoned.

ZPWMA's limited financial resources, or economic factors contributed to the increase. Further, while the number of animals poached in Zimbabwe does not appear to be as high as in other countries, information that was presented at CoP16 (CoP16 Doc. 53.1) indicates that there has been a steep rise in poaching incidents. Without more definitive population data, like what should come from the Pan African Aerial Elephant Survey when all of the data are released, there is no way to determine whether these numbers, combined with other offtake, are sustainable.

While the number of elephants taken as problem animals was not elucidated in material provided by ZPWMA in April 2014, it appears, based on their response and documentation provided by Conservation Force, that a large number of elephants are taken each year. ZPWMA reported that in a 3-year period (2009-2011), there were 372 human-elephant conflict cases for four "hot spot" districts. It is not clear if elephants were removed in each of these cases. However, the Service has anecdotal evidence suggesting that the number of problem animals may equal or exceed the number of elephants taken through sport-hunting.

The December 10, 2014, letter from ZPWMA, however, included some further information on off-takes. According to this letter, the percentage breakdown of all off-takes was as follows: 5% from problem animal control, 55-60% from hunting, and 35% from poaching and natural mortality. While specific numbers were not provided, the letter also stated that an average of 40 elephants was taken annually as problem animals. Therefore, if these percentages are correct, hunting off-take would be 440-480 animals, and poaching/natural mortality would be approximately 280 animals. However, the December letter also stated that management offtake (culling, training exercise, and meat production for park staff) was approximately 95 elephants annually. Based on these numbers and with a reported 3-year average of 180 elephants taken annually due to poaching (the 2013 Hwange incident of 105 elephants being poisoned was not included in this average), the natural mortality of elephants in Zimbabwe is approximately 100 animals/year or 0.12% annually. Since this is far below the likely natural mortality rate of healthy elephant populations, we question the accuracy of the percentage breakdown provided by ZPWMA in their letter.

African elephants in Zimbabwe are listed in CITES Appendix II, with an annotation that allows trade in hides. According to CITES trade data, at least 2,373 hides were exported in 2010, 3,204 in 2011, and 4,675 in 2012. It should be noted that these numbers probably do not equate to whole animals, but include whole hides and parts of hides. Some of these hides may have been obtained from sport-hunted trophies, problem animal control, or culling operations. Based on these reported numbers, it is not possible to determine the elephants taken specifically for the hide trade, however. While the Service asked about the export of hides in its October 31 letter, ZPWMA did not directly address the issue in its response letter. They did state that the export of hides was authorized under the annotation for African elephants and that all hides that are exported are legally obtained.

We continue to have fundamental questions regarding how the number of elephants to be hunted in an area is decided. In addition to questions about how the overall offtake is determined, we also have not received an adequate explanation on how the quota is allocated spatially. According to information from ZPWMA, and from safari outfitters and professional hunters associations, the principle form of utilization of the elephant in Zimbabwe is sport-hunting.

Quotas are apparently set to maximize the sustainable production of high-quality trophies without detriment to the population. However, it appears that the national export quota of 500 elephants may be the primary driver when establishing individual quotas for each hunting area, as opposed to determining the best quota to facilitate management goals for those areas. According to the material provided to the Service, it appears that the annual national quota of 500 elephants is divided up and allocated to each area based on recommendations from ZPWMA ecologists, field staff, safari operators, other stakeholders, and technical specialists through "multiple stakeholder participatory quota setting". According to information provided by ZPWMA, on an annual basis, stakeholders use available population data to propose a particular quota for an area to a Quota Setting Workshop. At this workshop, it is determined if the proposed quota should be adopted or modified in relation to other proposed quotas. Factors that are considered each year include population estimates, growth rates of populations, size of hunting areas, status of habitat, and target elephant population size.

While the material provided to the Service lays out the general process, the Service did not receive any specific information on how quotas are established in practice. ZPWMA provided the District Quota Setting Toolbox and the Quota Setting Manual, published in 2000 and 1997, respectively. While these documents are useful training material, they only provide a general overview of quota setting for all species in Zimbabwe. In establishing a quota, one must take into consideration not only the habitat, population size, and size of the hunting area, but other offtakes and environmental impacts that may be affecting the species. Nothing that ZPWMA provided addresses these elements specifically. Further, if ZPWMA starts with the premise that the sum of all established quotas must equal the national export quota, it is not clear if the science is driving the quota-setting process or if the social/economic benefits derived from hunting is the driving force. Finally, without current population data and information on the distribution of elephants across the country, both of which would come from scientifically based population surveys, it would appear that establishing a scientifically viable quota, either higher or lower than previous years, would be impossible. The current quota-setting process utilized by ZPWMA may take into consideration issues raised in this document, but without providing an explanation of the system used and describing the calculations, the Service cannot determine if sport-hunting quotas are reasonable or beneficial to elephant populations, and therefore whether sport-hunting is enhancing the survival of the species.

One of the aspects of whether current elephant management facilitates long-term sustainability of hunting programs is the length of hunting leases. There is a general consensus, supported by antidotal evidence, that shorter leases do not give safari operators an incentive for long-term planning. A representative of the Safari Operators Association of Zimbabwe (SOAZ) and the Zimbabwe Professional Hunters and Guides Association (ZPHGA) at the 2014 workshop, stated that the "present 5-year leases are not working as areas are being abused at the expense of wildlife" and that "[l]onger leases will provide better protection and investment in such areas. All leases must be open and transparent." In addition, he expressed that "[a]t present, large fixed quotas are forcing concession holders to take young animals that should not be shot, to recoup moneys paid for leases and trophy fees. Authorities need to stop transfers of quotas from one area to another for elephant and for all trophy species." He spoke of the need for taking smaller,

non-trophy bulls that are conducting crop raids to compensate local communities. He also spoke of stopping commercial hunts in the national parks and "most of all, keep the South Africans out – they are abusing our wildlife". He recommended that ZPWMA allocate all quotas by December 1 each year so that operators can market their hunts effectively. He also called for greater communication between ZPWMA and SOAZ and ZPHGA.

A second presenter at the workshop representing the Zambezi Society, stated in the working session on Coordination, Monitoring, Reporting, and Annual Adaptive Management that "we are looking at managing a multi-million dollar resource and what is a major project but appointing a part-time coordinator to attempt to pull together a multitude of stakeholders with a result that will fail". The speaker further stated, "[t]he way elephant conservation has been managed over the last several years in the face of an escalating poaching threat has clearly failed. ...The four sub-regions have differing characteristics and problems and separate plans are required for each sub-region" and called for a professional project manager to head the elephant conservation and management program in Zimbabwe, "otherwise it will not succeed."

While the above comments were made by two individuals at the workshop, since both individuals represented National organizations, their statements could be taken as an indication that additional work is needed to better coordinate professional hunters, safari outfitters, and NGOs with ZPWMA and communities. Without this "partnership" long-term sustainability of the hunting program could be affected and the role that U.S. hunters play could be questioned.

Revenue Utilization: On communal lands in Zimbabwe, the protection of elephants falls primarily under the Communal Areas Management Programme for Indigenous Resources (CAMPFIRE), which encourages reductions in human-elephant conflicts through conservation-based community development. The program was established in 1989 as a means of providing an economic incentive and return to rural communities while encouraging tolerance for the elephant and sustainable use of natural resources. This program has been the model for community-based conservation efforts in several other African countries and identified as an innovative program in the past. Under this program, there are currently 29 Rural District Councils (RDCs) that have been granted Appropriate Authority status under the Parks and Wild Life Act. Based on several CAMPFIRE documents presented to the Service, between 12 and 16 RDCs with exploitable wildlife resources make up the core of the CAMPFIRE program. While the Service recognizes that CAMPFIRE plays a role in elephant management, we did not receive clear information on the significance they play in elephant conservation (e.g., amount of elephant habitat occurring on RDC land or the percentage of elephant trophies taken on RDC lands).

According to the Revised CAMPFIRE Revenue Sharing Guidelines, which were incorporated into the Constitution of the CAMPFIRE Association in 2007, at least 55% of generated revenue from hunting should be devolved to producer communities, no more than 26% and 15% for management and overhead at RDC level, respectively, and 4% as a levy to the CAMPFIRE Association. According to an undated document (but presumably produced in late 2014) produced by CAMPFIRE (CAMPFIRE report undated) at least 10 RDCs comply with the Revenue Guidelines. As reported in this document, data were presented in an October 2013

report stating an estimated US$2,496,349 was generated by 15 RDCs in 2012 from hunting revenue. While this report states that 5 out of 13 RDCs contributed 84% of the hunting revenue, the supporting table to this statement does not reflect this number. Further, the report states that an assessment of 18 main CAMPFIRE districts allocated hunting quotas for 2014 shows that 106 out of 167 bull elephant hunts were booked by U.S. hunters and that elephant hunting contributes more than 70% of the income to the CAMPFIRE program, and that 90% of all CAMPFIRE revenue comes from all hunting.

The CAMPFIRE report (undated) reported that in the Community Based Natural Resources Management Stocktaking Assessment Report by Mazambani and Dembetembe (2010) [Service does not have a copy of this report], between 1989 and 2006, US$88.9 million in gross revenue was realized by key stakeholders in the CAMPFIRE program. Of this revenue, 55% went to safari outfitters, 23.4% to producer communities, 19.8% to RDCs, and 1.8% to CAMPFIRE Association. (The Service has no additional documentation or information to validate these figures.)

CAMPFIRE may well provide a "multiplier effect" concerning ecosystems goods and services. According to information received by the Service, in 2007, an estimated 777,000 households from 37 RDCs benefited directly or indirectly from CAMPFIRE. According to an estimate by CAMPFIRE officials (CAMPFIRE report undated), given that 58 RDCs now participate in CAMPFIRE (other sources state that there are 60 RDCs in CAMPFIRE), it has been extrapolated that over 1 million households now benefit from CAMPFIRE.

Several reports provided to the Service identify a large number of community projects funded by CAMPFIRE. These reports indicate CAMPFIRE programs contribute to employment at a local level – CAMPFIRE managers and officers, timber measurers, office clerks, game scouts; community projects employ resource monitors, tour guides, preschool teachers, grain millers, bookkeepers; and safari operators employ managers, scouts, trackers, drivers, cooks, camp minders, and professional staff such as bookkeepers and professional hunters.

On 17-18 November 2014, a workshop titled "CAMPFIRE Stakeholder's workshop: Towards the Development of a New Elephant Management Plan and Policy" was held in Zimbabwe. The discussions and recommendations touched on the effectiveness of the CAMPFIRE concept and its relationship to tourist hunting. At the workshop, Charles McCallum Safari reported that they had contributed over $349,000 to CAMPFIRE wards and the RDC in 2013 – U.S. elephant hunters contributed 40% of this total ($132,870). In 2014, the total was up to $400,995 but contributions due to U.S. hunters dropped to 27% ($100,800) – all elephant hunting was only 32% of the total ($118,425). It appears that the workshop may have been a good starting point to address issues faced by RDCs and to improve the effectiveness of CAMPFIRE. However, according to Conservation Force, represented at the workshop, CAMPFIRE needs to find a balance between a large elephant population and human population pressures, as well as ensure that revenue from tourist hunting and other resource uses continue to flow to local communities. The 2014 Pan African survey preliminary results appear to confirm that elephant populations in the Zambezi Valley and in Sebungwe have decreased significantly. These areas include

communal land. The declines indicate that the persistence of elephants in these areas may be in question in future years if the trend is not halted or reversed.

Dr. Martin states in his "Third Report: Potential Financial Returns from Trophy Hunting" (pg. 19, 21) that "when the results from all the available hunting areas in Zimbabwe are added up, there is sufficient income from trophy hunting to meet the conservation budgets for all the areas [of the elephant range]..." This may very well be true, but no such data was provided to the Service. We received reports from some private areas, conservancies, and RDCs, but even in these cases, insufficient information was provided. We received generalized reporting of hunting as a whole, without a breakdown of elephant vs. other species, or U.S. hunter vs. all hunters. Although there is some indication that some benefits are occurring, insufficient information has been provided to show that revenues generated by U.S. elephant hunters satisfy the conditions of enhancement under the ESA.

FWS does not disagree that local communities can benefit from well-managed resource management programs, but we are unable to determine how much revenue is generated by elephant hunting, how those funds are distributed within Zimbabwe, and what portion of that budget is accounted for by US hunters? SCI indicates, in their January 23, 2015 letter, that the inability to import trophies in 2014 resulted in an increase in human-elephant conflicts in CAMPFIRE RDCs from 412 incidents in 2013 to 597 in 2014. No data was provided to document a link between the increase in human-elephant conflicts indicated by SCI and the suspension of imports in 2014.

Local conservation efforts: Conservation Force and other commenters emphasized the economic impact of the suspension to local conservation efforts being carried out by individual landowners and leaseholders, safari outfitters, and conservancies. Effective conservation work is being carried out in some independently managed areas. Individuals may be impacted by a suspension of elephant trophy imports, however, it is unknown whether and to what extent these individuals would reduce their conservation efforts based on the inability of U.S. hunters to import a sport-hunted trophy. In addition, the information available to the Service on the conservation work being carried out by non-governmental entities, at this time, is limited, and is not the norm for Zimbabwe as a whole. While these pockets of conservation are greatly needed, there does not appear to be a mechanism in place, such as government support, tax incentives, or land tenure security, to promote or sustain these efforts across Zimbabwe's elephant range. The Service was made aware of several workshops that will be held or were held in the beginning of 2015. According to Conservation Force, a workshop on anti-poaching strategies for Mana Pools National Park was held on 26-29 January 2015. The workshop appears to have been sponsored by ZPWMA with NGO, safari operators, and some RDC representation; however, we have not received any information on the purpose of the workshop or any results. In addition, a workshop in Sebungwe was held sometime in January or February 2015. Again, we are not clear on the purpose of the workshop or any results. However, if these and other workshops were held that bring ZPWMA, RDCs, and safari operators together to discuss elephant conservation and management, it would appear that steps are being made to move forward in increasing communication and addressing issues.

Therefore, with the information made available to us, the Service cannot at this time determine that these limited activities would provide the enhancement required under the ESA to allow imports of trophies taken throughout Zimbabwe.

Summary: The issue before us is whether the killing of an elephant in Zimbabwe whose trophy is intended for import into the United States would enhance the survival of the species in the wild. When the Service announced the interim suspension on the import of elephant trophies from Zimbabwe on April 4, 2014, we based the decision on the lack of information available to the Service at that time that would enable us to make a positive finding. In response to our April 4, 2014, announcement and letters sent to the Government of Zimbabwe on April 4 and October 31, 2014, we received a large volume of information directly from ZPWMA, Conservation Force, Safari Club International, and a number of safari outfitters and professional hunter associations. Some information indicated that hunting in Zimbabwe was providing a benefit to elephants, while other information raised questions that were not answered. Many of our specific questions were not answered with the information provided. Based on our review of all of this information, we are unable to find that the killing of an elephant whose trophy is intended for import would enhance the survival of the species in the wild due to the following factors:

- Zimbabwe's current elephant management plan consists of two primary documents drafted in 1996 and 1997. Although the documents provide a well-developed list of goals and objectives, there is no information on whether these goals and objectives have been met or could be met. This is supported by statements from ZPWMA that the plans are outdated and need to be revised.

- Now that the Pan African Elephant Aerial Survey has been conducted in Zimbabwe and preliminary findings have been announced, ZPWMA and RDCs have a better elephant baseline population abundance estimate to assess future off-take quotas, management efforts, and anti-poaching activities. This is a significant, positive, step forward in Zimbabwe having adequate information to establish scientifically defensible hunting quotas, particularly in light of the limited information on other means of off-take, such as poaching and problem animal control. If this information is incorporated into ZPMWA management activities in a scientifically sound manner, the Service may have a better basis to re-evaluate our finding with regard to importation of elephants taken in the future.

- There appear to be adequate laws and regulations in place to address elephant management, but it is not clear if or to what extent ZPWMA is able to successfully implement them. Since the central Zimbabwean Government is not allocating funding to ZPWMA and the vast majority of funding must come from hunting revenues, ZPWMA, and CAMPFIRE need to document more fully the amount of revenue generated and how it is utilized. For the 2014 hunting season, the Service received limited evidence to support a positive enhancement finding. If accounting mechanisms are in place or are put in place that document hunting revenue and details are provided on how those funds are used for resource protection such that the Service would be able to find that hunting revenues generated

through sport-hunting of elephants in Zimbabwe whose trophies are intended for import into the United States would enhance the survival of the species in the wild, the Service could re-evaluate our finding with regard to importation of elephants taken during the 2015 hunting season or future hunting seasons.

- According to the information provided, Zimbabwe has established hunting quotas for all areas of the country. However, the Service did not receive specific information on how these quotas are established, whether other forms of offtake, such as poaching and problem animal control, were taken into account, or to what extent biological factors are taken into consideration (as opposed to economic and societal considerations).

- While CAMPFIRE has provided conservation benefits in the past and improved tolerance of wildlife in rural communities, the program has more recently come under criticism relating to excessive retention of generated funds by district councils, resulting in diminished benefits to communities. Sport-hunting may be an important tool that gives these communities a stake in sustainable management of the elephant as a natural and economic resource and offsets the costs of conflict with wildlife. However, without current information on how funds are utilized and the basis for hunting off-takes, the Service is unable to confirm whether revenue generated through sport-hunting actually provides an incentive to local communities to conserve elephants. The Service was pleased to hear about the November workshop and acknowledges that additional work is needed by CAMPFIRE to address current management concerns. Again, if additional information is forthcoming regarding activities in 2015, the Service may be able to revisit this finding.

- As stated in the previous finding, there are "bright spots" regarding elephant conservation efforts, particularly those carried out by non-governmental entities that are providing a benefit to elephants in some areas. However, there are not enough of these "bright spots" to overcome the problems currently facing Zimbabwe elephant populations and to support a finding that sport-hunting is enhancing the survival of the species. Without more support from the Central Government and Rural District Councils, these efforts are not likely to be fully successful or to compensate for the management deficiencies described above.

Therefore, based on this finding, no elephants harvested in Zimbabwe on or after January 1, 2015 may be imported into the United States.

ATTACHMENT

Chart of Key Documents and Supporting Evidence

EXCERPTS FROM KEY DOCUMENTS IN SUPPORT OF THIS APPEAL

The charts below contain key quotations from some of the key documents submitted during the thirty-eight months of the suspension. These documents include ZPWMA responses to FWS information requests, reports from the CAMPFIRE Association, reports from safari hunting operators, and the letter from the AfESG, among others. The following charts are broken down by the sub-topics of the March 26, 2015 Finding. Issue-by-issue, the documents refute the alleged lack of data, reliance on "anecdotal" or "antidotal" information, and mistakes in the Finding and provide extensive documentation of enhancement.

All documents have previously been produced to the FWS including, most recently, in support of the applicants' request for reconsideration.

Management Plans

DOCUMENT NAME	SAMPLE OF KEY QUOTATIONS
ZPWMA Apr. 2014 Response	- The Authority supervises the implementation of the plan outside protected areas including communal areas, Conservancies, Forestry Commission area and private land. (p. 2)
ZPWMA Dec. 2014 Response	- 1.4 Has ZimParks established specific measurables of management actions for the goals identified in the management plan documents that will/are being taken? … Yes we have specific measurables of management actions for example: - i) Population parameters: numbers, Eg Aerial survey results, age, sex, distribution movement patterns through satellite tracking and collaring (through monitoring and surveys), trophy quality - ii) Law enforcement effort: Number of patrols, patrol nights, number of convictions, number of elephants poached, number of new Statutory Instruments approved - iii) Game water supple: number of boreholes working, number of elephant mortalities - iv) Fire management: Annual fire management plans developed and implemented, area burnt by unplanned fires, length of fireguards - v) Awareness programs: No. of awareness campaigns held, no. of people reached (p. 11-14)
ZPWMA July 2015 Response	- The population estimate from the 2014 aerial survey stands at 82,092 elephants. In the early 1900s the elephant population in Zimbabwe was estimated to be about 4,000. By 1980 the population had increased to an estimate of 46 426 elephants. The population continued to increase … twenty-fold … despite attempts to limit elephant population growth between 1960 and 1989 … The human population has also increased twenty-fold between 1900 and 2000, resulting in increased demand for land for

	agriculture and other forms of land-use outside protected areas thereby limiting the area available for elephants with a resultant increase in human elephant conflict … The high economic value conferred to the elephant through consumptive utilization has also resulted in increased tolerance by local communities. (p. 1) - Explanation of specifics of Elephant Management Plan (p. 9-19) - Zimbabwe has developed a number of national policies, as well as adopting regional and international protocols to address poaching. As explained the 17 April 2014 response to the USFWS poaching incidents are handled though a coordinated public-private response, including heightened law enforcement, severe deterrent sentencing, awareness campaigns, and substantial donations from the private sector to boost ranger and equipment capacity. Steps were also taken after the Hwange poisoning incidents to improve radio communications in that area, as well as establishing a new station with 15 rangers, to increase law enforcement coverage. Aerial surveillance in Hwange and other areas has been intensified. (p. 27) - It is one of the ZPWMA's policies to cooperate with safari operators, who provide significant assistance by alerting ZPWMA rangers to poaching threats; providing equipment, training and transport; and conducting their own anti-poaching patrols among other things. (p. 27)
ZPWMA, Elephant Management Plan 2015-2020	- The Role of Sport Hunting in Elephant Conservation: Elephants are a charismatic species but can also be destructive when they destroy crops, threaten livestock and even human lives. To have a future, elephants must have value. Value to the governing authorities and to the local people. The greater the value, the greater the tolerance of them is likely to be. The local people who live closest to them will determine the long-term survival of species like elephant. Regulated sport hunting converts wildlife into assets for the benefit of local people and the country as a whole. Wildlife can be a most valuable asset and in turn empower local communities and provide basic necessities. When it is viewed as a valuable asset, wildlife becomes an economically competitive land use in Zimbabwe, which leads to habitat preservation instead of habitat destruction and conversion to agriculture or livestock production. Game animals have a survival advantage because of user-pay stewardship systems where use revenue generated from tourist hunters is paid through to wildlife authorities and local communities. The presence of regulated hunting can also reduce illegal activities. Many hunting operators in Zimbabwe have specialised anti-poaching units. Private operators' lease agreements are being reviewed to include anti-poaching as an obligation of the concessionaire. Regulated hunting is the opposite of poaching. One is a lawful activity designed by government wildlife authorities and experts to perpetuate resources and the other is prohibited thievery outside of and away from the system. The first is like making a bank

	deposit and the second is like a bank robbery, without sustainable limits. Trophy hunting revenues are vital because there are not enough tourists to otherwise generate income to support all protected areas. Eco-tourism revenues are typically sufficient to cover the costs of only some of the parks and certainly not to justify wildlife as a land use outside of protected areas. Hunting is able to generate revenues under a wider range of scenarios than eco-tourism, including in remote areas lacking infra-structure, attractive scenery, or high densities of viewable wildlife. Consequently, elephant and other wildlife populations will be negatively affected through reduced conservation efforts arising from low funding and reduced goodwill from the communities, when in reality the elephant has the economic potential to raise adequate funds to support itself and other species. For these reasons, Zimbabwe confirms its commitment to the sustainable use of elephant and other wildlife in this Action Plan. (p. 12, Box 1) - v) Private sector: The corporate community participates in elephant management mainly through resource mobilization. Safari operators report poaching and assist in anti-poaching patrols. Through lease and trophy fees they provide revenue to ZPWMA. They help develop infrastructure, provide funds to communities and supplement diets with meat from trophy animals. Zimbabwe subscribes to the principle of sustainable utilisation of wildlife resources including elephants. Sport hunting is the principal form of wildlife utilisation whereby offtakes are adaptively managed and monitored through a participatory and science based process. This process allows for sustainable offtakes, and rigorous resource monitoring programmes that allow recruitment within a population to ensure the continued survival of the population in the wild. The high economic value conferred to the elephant through consumptive utilisation has also resulted in increased tolerance by local communities. (p. 12) - vi) Local communities: Local communities are involved in elephant management in CAMPFIRE areas, through sharing of information, advocacy and wildlife protection. They report human-elephant conflicts and carryout some of the conflict management activities. (p. 12-13) - The Importance of Community Based Conservation to the Future of Elephant Management in Zimbabwe: The Community Areas Management Programme for Indigenous Resources (CAMPFIRE) of Zimbabwe has been widely regarded as one of Africa's most successful contemporary conservation initiatives. It permits the residents of communal lands – basically the poor rural communities – to share in the benefits generated by wildlife utilization on those lands by granting Appropriate Authority to Rural District Councils (RDCs) to manage wildlife on communal lands and requiring a certain percentage of revenue to be paid to the wards and councils. CAMPFIRE operates in about 50,000 km2 (12.7%) of land in Zimbabwe. This is roughly equivalent landmass to the Parks and Wildlife Estate. CAMPFIRE encompasses about 777,000 households with an average family size of five, who face food insecurity and deep poverty (average income $1 a day). Between 1994 and 2012, CAMPFIRE generated $39 million of which $21.5 million was allocated to communities and used for resource management (22%), household benefits

	(26%), and community projects (52%). About 90% of CAMPFIRE's revenue comes from hunting, with elephant hunting contributing more than 70% of annual revenue. Based on the Constitution of the CAMPFIRE Association as amended in 2007, all major hunting RDCs use CAMPFIRE revenue-sharing guidelines. In these districts safari operators pay revenue directly into community-controlled bank accounts using the following breakdown: CAMPFIRE community share (55%), RDC fees (41%), CAMPFIRE Association levy (4%). Despite its achievements CAMPFIRE still faces fundamental challenges. In particular, the development strategies of households in CAMPFIRE areas focus on land uses that are incompatible with wildlife such as human immigration to rural areas, the extension of basic agricultural schemes and increased livestock numbers. Other CAMPFIRE challenges include: (i) the downturn in Zimbabwe's economy and tourism sector post-2000, (ii) great reliance on consumptive trophy hunting and less focus on other uses and non-consumptive uses of natural resources, (iii) increasing human populations averaging 16-20 people per km^2 in some key wildlife districts, and (iv) lack of re-investment in development, fixed assets, human capital, and management and protection of wildlife in CAMPFIRE areas. Despite these challenges, CAMPFIRE stands very high in the agenda of Zimbabwe's Government, and a review dedicated to improving the programme, including greater devolution of ownership of wildlife to communities, is ongoing and should be finalized by the end of 2015. Zimbabwe's Government recognizes that the survival of wild animals depends entirely on those among whom they live. Unless local people want to save them, wildlife will be poached to the point where just a few remain in fortified reserves. CAMPFIRE is meant to avoid this and the future of wildlife in communal areas rests on the success of this programme. (p. 12-13, Box 2) - 1.3.5 Links with continental (African Elephant Action Plan / SADC) and other regional initiatives: This Action Plan recognizes the existence of the African Elephant Action Plan and initiatives that are currently taking place at a continental level, including by the African Union. These include the development of the Common Strategy on Combating Illegal Exploitation and Illegal Trade in Wild Fauna and Flora in Africa. At the SADC level initiatives involve developing a Plan of Action and implementing the SADC Protocol on Wildlife Conservation and Law Enforcement. This Action Plan will be reviewed periodically in the light of developments that are taking place in the SADC Region, Africa and beyond. - 1.3.6 Regional strategies within Zimbabwe: The devolution of management oversight to regional levels, with more detailed action plans within the national plan, provides the basis for effective adaptive management at regional and local levels. As set forth in the framework below (Sections 3 and 4), four regional plans have been drafted to address the unique challenges of each region, and will implement the broader goals of this national Action Plan at a more specific level. In addition, Park-level plans for specific protected areas (including Hwange National Park, Mana Pools National Park, and Gonarezhou

	National Park) contribute to this Action Plan and govern the management of elephant within those protected areas. (p. 14) - 1.3.8 Human elephant conflict: As Zimbabwe's human population grows, elephant are being restricted to smaller areas and as their populations expand they increasingly move out of their designated habitat, and raid crops and sometimes threaten human lives. As a result in many rural areas where elephants exist in Zimbabwe, human-elephant conflicts are increasing, creating substantial negative attitudes to the conservation efforts of elephants. These are often among the poorest rural farmers, which makes the issue complex in social and economic terms. Unresolved conflicts stimulate poaching or retaliation. Poachers or retaliators can be seen as "local heroes" because they provide meat to the communities and resolve the conflict. A major challenge for elephant management is keeping human-elephant conflicts to a minimum. Developing a Social, Economic, and Cultural Framework has been identified as a Key Component of this Action Plan in an effort to address and reduce human-elephant conflicts. (p. 15) - Towards a Comprehensive Strategy to Reduce Human-Elephant Conflict: Some methods of reducing human-elephant conflict focus on curing the effects, not the cause. Such methods include chilli sprays, fences, and evening patrols to scare off marauding elephants. However, these are not necessarily long-term solutions. Long-term solutions require growing the tolerance of local communities for elephant by ensuring the communities benefit from having elephant on their lands. Tolerance is likely to increase if communities realise and appreciate economic returns earned from the sustainable use of elephant. Economic returns may be generated by consumptive and non-consumptive tourism. The devolution of decision-making on aspects of problem animal control to communities may result in better outcomes for the management of the costs and benefits of this activity. Problem animal control includes disturbing, removing, translocating, or ultimately killing those elephant that persist in damaging crops or threatening human life. Clearly, no one management option will successfully deal with all problem elephants and conflict situations. As part of this Action Plan, ZPWMA will undertake additional research on problem animal control and minimizing conflict, and will develop new solutions and a more comprehensive response to these issues. (p. 15, Box 4)
ZPWMA, Elephant Management Plan Supplement (2016)	- Table 1: Financial resources deployed up to August 2016 (p. 1) - Table 2: Other Non-Financial Resources (p. 2) - Progress towards Implementation of the Elephant Management Plan (2015 – 2020): Several milestones stated in the Elephant Management Plan have already been achieved which include the following: - Appointment of the Elephant Manager as in section 4.5 of the Zimbabwe Elephant Management Plan (2015 – 2020).

	- Getting a basic agreement of implementation in the 4 relevant regions. - Some work towards Law Enforcement, Monitoring, Investigations, Training and Community Relations. As of August 2016, more than USD 1 million had been spent on these activities. - Constraints and Challenges: One of the major challenges regarding implementation of the EMP is with regards to the adoption of stricter domestic measures by the United States of America. This has had the net effect of further reducing the revenue from hunting into the Authority, which therefore affects the budget allocated to resource protection, in particular the elephant in this case. One of the key impediments towards the full and comprehensive implementation of the Elephant Management Plan is the limited resources. However, Zimbabwe is at an advanced stage in the development of resource mobilisation strategies. These strategies include partnering with both local and international institutions in resourcing and financing aspects of the programme. (p. 2-3) - Priorities: Due to the fact that Zimbabwe is experiencing some funding constraints with respect to the full implementation of the Elephant Management Plan, which means therefore that it will not be possible to fully implement every aspect of the plan at the same time, we have developed a set of priorities (all drawn from the plan), that we feel are implementable and enable the work of conservation to proceed smoothly. - Law Enforcement: Law enforcement continues to be one of the most critical aspects of this strategy. From the perspective of the EMP, it has also to date been allocated the biggest budget (Table 1). While strategic gaps still exist with respect to the law enforcement capacity (the numbers of rangers on the ground are still in need of improving to effectively cover that Parks Estate, more patrol kits and equipment are still required to improve enforcement capacity). In order to effectively combat poaching and illegal trade the Law enforcement capabilities are top priority. - Monitoring: Biological monitoring and management, with respect to the priorities for this plan would come in as a second priority. This enables monitoring programmes and research to support science based adaptive management of elephants in this action plan. The resource allocation to this activity needs to be dramatically improved, although innovations have had to be put in place to manage that insufficient resource allocation. Rangers on patrol also carry out significant monitoring activities which feed into the biological monitoring and management of the elephants. - Investigations/Intelligence: The investigations capacity (together with training) are critical components of this action plan. To date of the available resources, allocations to investigations have been minimal. Innovations have also been developed in this area, for support from various private players, institutions and state institutions in the investigative processes. (p. 3)

	- Appointment of Elephant Manager: While the appointment of the National Elephant Manager has been concluded (April 2016) to enhance implementation, monitoring and evaluation of the Action Plan, funding constraints still exists. Some funding for the activities of the Elephant Manager have been unlocked through cooperation with stakeholders in the monitoring and evaluation activities of the office. This includes setting up of the Regional Elephant Management Committees and funding their activities. (p. 4) - Four annexes – status of implementation of each regional elephant management plan

Population Status

DOCUMENT NAME	SAMPLE OF KEY QUOTATIONS
ZPWMA Apr. 2014 Response	- Information on the status of elephants is derived from surveys which include, aerial, water-hole, road strip, walking transects, visitor observations /sightings and ranger based monitoring. (p. 1) - Currently the Authority is in the process of planning a national aerial survey in the dry season of 2014… (p. 4)
ZPWMA Dec. 2014 Response	- Population estimates for elephants are determined through various methodologies which include: aerial surveys, water hole counts, road strip counts and ranger based monitoring. Waterhole counts are conducted for Hwange and Mana Pools on an annual basis. A national aerial survey of elephants was conducted in 2014 as part of the Pan African Aerial Survey for Elephants. Monitoring of trends in trophy quality and other forms of utilization are on-going programs. Results from the monitoring are used to adjust hunting quotas in order to achieve the desired levels of trophy quality. (p. 2) - In addition to aerial surveys, the Authority conducts regular waterhole counts and road strip counts. Water hole surveys, for instance, provide valuable information which can be used to make decisions in the absence of aerial survey data. A good example is the general increase of the Hwange elephant population shown by water hole counts that have been conducted annually from 1972 to 20 14. (p. 15)
ZPWMA July 2015 Response	- The population estimate from the 2014 aerial survey stands at 82,092 elephants [and attaching survey results]. In the early 1900s the elephant population in Zimbabwe was estimated to be about 4,000. By 1980 the population had increased to an estimate of 46 426 elephants. The population continued to increase … twenty-fold … despite attempts to limit elephant population growth between 1960 and 1989 … The human population has also increased twenty-fold between 1900 and 2000, resulting in increased demand for land for agriculture and other forms of land-use outside protected areas thereby limiting the

area available for elephants with a resultant increase in human elephant conflict … The high economic value conferred to the elephant through consumptive utilization has also resulted in increased tolerance by local communities. (p. 1)

- Table 4a & 4b: MIKE data 2000-2014 (p. 25)

Chewore

	2010	2011	2012	2013	2014
Total Carcasses	29	51	43	91	52
# Illegally Killed	4	34	34	36	9
PIKE	0.14	0.67	0.79	0.40	0.17

NyamiNyami

	2010	2011	2012	2013	2014
Total Carcasses	19	16	52	36	27
# Illegally Killed	19	13	14	8	10
PIKE	1.00	0.81	0.27	0.22	0.37

ZPWMA, Non-Detriment Finding (2014)

- In Zimbabwe, despite the threat of poaching in some areas, the elephant populations have continued to increase in all the protected areas as indicated in Tables 4 and 5. Illegal off-takes remain at a low level. The major threat to the survival of viable populations is habitat loss and fragmentation outside protected areas due to the expansion of human settlements and agriculture. The protected areas within the Sebungwe region (Fig 1), for example, are relatively small (less than 10,000 km^2) and surrounded by communal lands. The existence of a hard edge between such protected areas and communal lands leads to serious human/elephant conflicts. Healthy and viable populations inside protected areas are depended on the existence of suitable habitats in communal areas. (p. 19)

IUCN AFESG Letter

- … on the basis of the AfESG's 2013 Provisional Status Report, the USFWS enhancement finding indicated that no surveys had been conducted in Hwange National Park … but in fact, a survey had been completed in 2007 … this survey was listed in the "New Surveys" portion of the AED website … the estimate … (financed by the USFWS) was 39,765 elephants … which would have added over 30,000 elephants to the DEFINITE category and changed the distribution of elephants across all data categories. (p. 2)
- There are four other instances in which the use of data from the AED presented within the finding's "Population Status" section demonstrated oversights or misinterpretations, as well as a fifth instance meriting clarification. First, the finding stated, "Several areas that were covered in the current surveys

	(2006-2010) indicate that there has been a substantial decline in the population" (page 6). The AED shows, however, that three surveys carried out in this period … estimated higher totals than their respective previous, comparable surveys [and pointing out that these four surveys plus the NW Matabeleland survey all dated since 2006 and exceeded 70,000 elephants] … As a result, we do not find support for the claim that these four surveys from 2006 to 2010 indicate a substantial population decline, nor do we understand the basis for this statement in the enhancement finding. (p. 2) - Even if all of these elephants [in the Save Valley survey] were double counted, which is highly unlikely, the total number would decline from 1,538 to 1,492 – a figure still higher than any previous counts of the area. (p. 3) - Additionally, the finding states that "A carcass ratio of less than 4% … is considered unrealistically low…" The first sentence suggests a conflation of carcass ratios from aerial surveys and mortality rates, and its conclusion is unwarranted… In the opinion of our DRWG, 4% seems a reasonable figure for a population not particularly affected by poaching. (p. 3) - Fourth, … the finding's comment that "only 304 definite animals were counted by aerial or ground counts" …, considering methodology within the DEFINITE category, is not relevant; and as stated in the next section, sample counts are not inferior to total counts. (p. 3) - [T]he USFWS also presented statements regarding the appropriateness of Zimbabwe's survey methodology … Our opinion … is that the methodological approaches applied in Zimbabwe are both adequate to estimate elephant population numbers and to allow the most consistent possible means for comparing these numbers over time. (p. 3-4) - [T]he enhancement finding suggests the incorporation of new technology as being necessary to improve estimate accuracy … This statement disregards the well-recognised and accepted advantages to maintaining consistent survey methods while indirectly implying the approach undertaken in Zimbabwe has been somehow sub-standard. While it is always the case that some improvements in accuracy might result from the use of new techniques, it is generally recognized that the survey techniques used in Zimbabwe are of a high standard and have been consistently applied over time. (p. 4) - Despite the fact that PIKE data for 2012 has been available … and updated findings for 2013 were posted … nearly a month before the enhancement finding was updated, the finding stated that 2012 and 2013 data were not available. (p. 4-5)
SOAZ Report	- We have received information from fourteen safari operators in Zimbabwe. The operations of these companies cover a wide range of safari concessions including Government Safaris Areas, Campfire Areas and Private Conservancies. They also include safari concessions in the three main wildlife systems in

	Zimbabwe being; (1) Zambezi Valley and Sebungwe, (2) the North West including Hwange/Matetsi/Vic Falls and (3) the South & South East Lowveld including Gonarezhou, Save Valley Conservancy & Bubye Conservancy. (p. 1) - The members of SOAZ do not believe that the national population of elephant is in decline or under threat as a result of poaching. On consultation with our members, most populations would appear to be increasing or stable. There does seem to be concern about the elephant population in the Sebungwe region where the impact of poaching is indicated as significant. While much of this information is anecdotal and not based on scientific survey, we are confident that in the vast majority of safari areas throughout the country, the elephant population is not significantly declining or under threat. (p. 4) - While National Parks provide the primary refuge for elephant populations in Zimbabwe, a significant proportion of elephant live in the safari areas which are generally more marginal in terms of wildlife numbers and often have large rural human populations within or adjacent to them. The role of safari operations in providing a benefit to such communities and enforcing anti poaching as a means of maintaining elephant and other wildlife populations in these areas cannot be underestimated. (p. 4)

Regulations and Enforcement

<table>
<tr><th>DOCUMENT NAME</th><th>SAMPLE OF KEY QUOTATIONS</th></tr>
<tr><td>ZPWMA Apr. 2014 Response</td><td>- (p. 12):
<table>
<tr><td>Year</td><td>2009</td><td>2010</td><td>2011</td><td>2012</td><td>2013</td></tr>
<tr><td>No. of Elephants Poached</td><td>145</td><td>77</td><td>223</td><td>212</td><td>293</td></tr>
</table>
- It is however important to note that although the trends in poaching have increased in recent years, the impact of poaching on the national elephant population is not significant. The Government of Zimbabwe reacted swiftly to the unprecedented elephant poisoning incident in Hwange National Park in 2013. A private sector driven fund raising initiative was set up which has to date managed to mobilize 21 vehicles, communication and field equipment for enhanced law enforcement. The ZPWMA has increased manpower level for Hwange and other protected areas through a massive recruitment drive. The police and the judiciary also actively collaborated with the ZPWMA in apprehending all 35 poachers that were involved in the elephant poisoning... (p. 13)
- Summary of arrests and prosecution of elephant poaching cases for period between 2011 and 2013 (p. 14)</td></tr>
</table>

	- The Parks and Wildlife Act Chapter 20:14 … recognises any land that is being used for wildlife conservation and designates the legal occupant of that land as Appropriate Authority. On communal lands/tribal Appropriate Authority is accorded to the Rural District Council. Appropriate Authority is the legal right to utilize and manage wildlife on the property under community jurisdiction. (p. 15-16)
ZPWMA Dec. 2014 Response	- Law enforcement activities are carried out in and outside protected areas through various strategies including extended, daily and strategic patrols in the elephant range areas. There are also regular training exercises in basic, intermediate and advanced anti-poaching tactics for the rangers as part of management activities to improve law enforcement. Rapid response anti-poaching units who have specialized training for deployment to high risk areas have been constituted as a result of the training activities. In 2013, countrywide law enforcement efforts resulted in the detection of a large number of poacher incursions and armed contacts including recovery of poached wildlife specimens and ammunition. In the same year, there were 27 armed contacts that resulted in 9 poachers being killed during field operations, whilst recoveries from poachers and illegal traders included 35 rifles, 1000 rounds of ammunition, 9 rhino horns and 491 elephant tusks. (p. 2) - There are no amendments to land tenure however, the elephant range extends into large areas of communal lands which form part of the migratory routes. Elephants are also found on private land where there is enough space for relatively sizable populations, e.g. in Conservancies. In most cases there is connectivity from core protected areas to communal areas under CAMPFIRE and to private farms, in some cases. The elephant range and migration corridors have been extended through the TFCA program—a regional policy initiative which Zimbabwe is implementing in collaboration with its neighbours. Currently Zimbabwe is pursuing six TFCA initiatives. Most of Zimbabwe's large protected areas are on the countries boundaries and the elephant populations are linked to these neighbouring countries' boundaries and as such, creation of these large conservation areas is a viable option for elephant range expansion. In doing so, Zimbabwe is implementing a policy direction adopted at a regional level to increase the habitat available to wildlife including elephants. (p. 11) - The Authority has successfully lobbied the Judiciary for stiffer penalties for wildlife crime including poaching … The measurable indicators include number of Statutory Instruments (SI) that have been gazetted, for example SI 45 of 2014. Capacity building workshops to improve investigations and prosecution of wildlife crime are conducted in partnerships with NGOs and these are also measurable indicators of management actions. (p. 13-14) - Table 1 shows the number and trends in elephant poaching in the parks estate since 2012 to October 2014. (p. 15)

ZPWMA July 2015 Response	- ZPWMA has a staff complement of 1,500 field rangers whose core mandate is anti-poaching activities. Table 5 below is an indicative budget for effective protection of the Parks and Wildlife Estates. Table 5: Budget for anti-poaching activities (p. 34-35) - Table 6: Summary of Serious Wildlife Crime Cases recorded in Zimbabwe (p. 35-36)
ZPWMA, Non-Detriment Finding (2014)	- Elephant poaching in Zimbabwe is relatively low but trends have been increasing in recent years … The conviction rate for the period under review (2011-2014 February) is 69% of locals and 95% of foreigners arrested. The high conviction rates indicate the level of understanding and appreciation of the elephant value by judiciary. Elephant poaching and illegal possession of elephant products are classified as an economic crime which carry a mandatory sentence of not less than nine years on conviction. The provision of a mandatory imprisonment of not less than nine years crimes as provided for in the General Laws Amendment Act (No. 5) of 2010 ensures deterrent sentences for poaching. (p. 19-20)
CAMPFIRE—Role of Hunting Report	- In 1982, the government amended the 1975 Parks and Wildlife Act to enable Rural District Councils (RDCs) to obtain 'appropriate authority' (AA) to utilize wildlife for commercial gain … This Act provided an opportunity to extend to communities in the Communal Lands the benefits that the private landowners enjoyed as a result of the 1975 Parks and Wild Life Act. This eventually led to the birth of Zimbabwe's Community Areas Management Program for Indigenous Resources (CAMPFIRE), which had far reaching impacts on wildlife productivity as well as the socio-economic wellbeing of CAMPFIRE communities. (p. 2) - The CAMPFIRE program was conceptually designed to focus on wildlife, woodlands, water, grazing resources, and grasslands. In practice, it focused on managing wildlife because of the direct monetary benefits which this resource offered to producer communities. The CAMPFIRE concept … was developed in response to the realization that unless communities living adjacent to National Parks can obtain direct value from wildlife, they will not protect the wildlife. These communities would also need to have a much greater say in how those benefits would be derived and utilized. (p. 2)
SOAZ Report	- We have received information from fourteen safari operators in Zimbabwe. The operations of these companies cover a wide range of safari concessions including Government Safaris Areas, Campfire Areas and Private Conservancies. They also include safari concessions in the three main wildlife systems in Zimbabwe being; (1) Zambezi Valley and Sebungwe, (2) the North West including Hwange/Matetsi/Vic Falls and (3) the South & South East Lowveld including Gonarezhou, Save Valley Conservancy & Bubye Conservancy. (p. 1)

<table>
<tr><td></td><td>
- Table 2 shows that the 14 Safari Operators that responded to the questionnaire spent a combined total of $957,843.00 on anti poaching in their areas and this employs 245 people specifically for anti poaching. (p. 4)
- Table 2. The expenditure on Anti Poaching and number of Anti Poaching personnel employed by 14 Safari Operators in Zimbabwe (p. 4)
<table>
<tr><td>Anti Poaching expenditure – 2013</td><td>Anti Poaching Personnel Employed</td></tr>
<tr><td>US$957,843.00</td><td>245</td></tr>
</table>
- As in Section 3, if these figures are extrapolated out to give figures relative to the 160 sport hunted elephant imported into the USA each year from Zimbabwe, we can make the assumption that US hunters are assisting with the funding of $1,388,872.35 towards anti poaching in Zimbabwe through their safari payments and that this is enabling the employment of 355 anti poaching personnel along with all the equipment and support required. The imposed suspension on the import of sport hunted elephant into the USA from Zimbabwe will have a significant detrimental impact on these figures and in many cases the anti poaching efforts will not be sustained. (p. 4)
</td></tr>
<tr><td></td><td></td></tr>
<tr><td>FWS Press Release</td><td>
- In Zimbabwe, available data, though limited, indicate a significant decline in the elephant population. Anecdotal evidence, such as the widely publicized poisoning last year of 300 elephants in Hwange National Park, suggests that Zimbabwe's elephants are also under siege.
- Legal, well-regulated sport hunting, as part of a sound management program, can benefit the conservation of listed species by providing incentives to local communities to conserve the species and by putting much-needed revenue back into conservation. At this time, the Service does not have conservation concerns with African elephant sport hunting in Namibia, South Africa, or Botswana; though it should be noted that Botswana is not currently open to elephant sport hunting.
</td></tr>
</table>

Sustainable Use

DOCUMENT NAME	SAMPLE OF KEY QUOTATIONS
ZPWMA Apr. 2014 Response	- Allocation of quotas in hunting areas is based on a consultative process that involves ZPWMA authorities, hunters, safari operators, local communities, land owners, researchers, and NGOs. The participatory approach ensures that the quotas allocated for each hunting area are sustainable. (p. 4) - Factors considered for quota-setting annually (p. 20-22)

ZPWMA Dec. 2014 Response	- The quota-setting process is participatory involving private landowners, ZimParks and CAMPFIRE or local community wildlife managers. Quotas are set so as to have a representative number of animals that can be safely removed during a hunting season without inflicting biological damage to the population. The aim of quotas is to ensure that the utilization of wildlife is sustainable. Data on genetic drift, estimated population, disease outbreak, trophy size, age of animal hunted, habitat status and illegal offtake is used to safeguard sustainable quotas … Trophy quality is monitored and quotas are adjusted in order to maintain desired trophy quality. (p. 7-8) - As an example in 2014 to date over 90 cases of PAC have been reported whilst only 37 elephants have been killed. This is in line with the annual average offtake of 40 individuals [as PAC]. It is therefore not true to state that the number of elephants taken on PAC is equal to or may exceed the number of elephants taken on sport hunting. (p. 23) - In Zimbabwe, the quota setting process is participatory. This participatory quota setting process is ideal as it aims at having a co management approach where all the relevant stake holders become active participants who complement the Authority's efforts. Inputs into the quota setting process includes population estimates, densities, distribution patterns, habitat quality, trophy quality, hunting success rate, ranger based monitoring reports, environmental variations, natural mortality, capture and translocations, diseases, size of hunting area, management systems in place, CITES National Export quotas, trade and export data. Before any hunting takes place in Zimbabwe, the hunter has to have a hunting quota which will have been determined through an annual transparent consultative quota setting workshops. The workshops are done at local community and property level first and foremost. At this level stakeholders include: field managers, safari operators, technical specialists and local community. Secondly, the process then goes to a national quota setting level where the Scientific Authority in this case ZIMPARKS ecologists and all other stakeholders will be present. The Scientific Authority through an adaptive management process and rigorous resource monitoring programme, uses all the information generated to ensure that all off-takes are sustainable. Quotas can be reduced to allow recruitment into a population if there is a decline in trophy quality or low hunting success rate and other factors such as poaching. Quotas are therefore adjusted annually in response to prevailing conditions. As an example, the proposed 2015 sport hunting quotas were set in consultative workshops held at various centres around the country using a participatory approach taking into account factors that influence the ecological viability of the hunted species such as population numbers, spatial distribution, management practices (especially for private properties), illegal harvest levels, offtake rates (hunting success) and trophy quality trends. Preliminary results of the just concluded aerial census of elephants and other mega herbivores, trophy quality trends and offtake rates from the TR2 database were the main sources of information for input into the quota determination process. Overall, there

	were downward revisions for quotas for all the major species in the year 2015 except for crocodile. The proposed 2015 quotas for the other major species are as follows, (for comparison, 2014 quota are in brackets); Elephant 380 (500), Buffalo 1 268 (1 363), Leopard 500 (483) and Lion 74 (99). (p. 23-24)
ZPWMA July 2015 Response	- Elephant mortalities were recorded under various categories as shown in Table 9 below. The major causes of mortalities over the five year period are natural, poaching and sport hunting. It should be noted that other management off-takes entail ration and training quotas which were set at about 95 animals nationally for ZPWMA run areas. (p. 43) - Table 9: Causes of elephant death from 2010 to 2015 (p. 43) - Trophy hunting of elephants, or any wildlife species in Zimbabwe, is undertaken through a strictly regulated quota setting system. Quotas are issued each year to approved landholders by ZPWMA and this is done through national quota setting workshops. These workshops rely on information supplied by landholders as well as ecological reports submitted by Parks' ecologists and independent wildlife consultants … All offtakes for the African elephant in Zimbabwe are sustainable. Key factors that Zimbabwe considers when setting quotas are shown in the Table 10. (p. 43-44) - Table 10: Quota allocation for 2014 by major range (p. 44) - Table 11: Factors considered in quota setting (p. 44-46) - Quotas are set so as to have a representative number of animals that can be safely removed during a hunting season without inflicting biological damage to the population. The aim of quotas is to ensure that the utilization of wildlife is sustainable. Data on genetic drift, estimated population, disease outbreak, trophy size, age of animal hunted, habitat status and illegal off take is used to safeguard sustainable quotas. On average, quotas are set based on current data at approximately. The quota for 2016 is set at 400 elephant which is 0.49% of the national population. (p. 46) - Figure 8: Multi stakeholder participatory quota setting (p. 47)
ZPWMA, Non-Detriment Finding (2014)	- Trophy hunting of elephants is undertaken through a strictly regulated quota system. Quotas are issued each year to approved landholders by the Zimbabwe Parks and Wildlife Management Authority and non-detriment findings are conducted for all exports. Policies and legislation related to utilization of the African elephant are strictly adhered to and implemented. In areas where there is a decline in trophy quality, a hunting moratorium can be imposed to allow the population to recover as was the case with African lions North West Matabeleland from 2004 to 2008. Quotas are also reduced in areas where

	there is a decline in trophy quality. All the off-takes for the African elephant in Zimbabwe are sustainable. Key factors that Zimbabwe considers when setting quotas are shown in Table 8. (p. 25) - Table 8: Some key factors considered in quota setting (p. 26) - Figure 8: Export of sport hunted elephant trophies from Zimbabwe (2008 – 2013) Source: (TR2 Database ZPWMA 2014) (p. 31) - The ZPWMA has a comprehensive system to monitor off-takes from the elephant population. All field stations report on a monthly basis, animals killed through all forms of offtake. Safari operators are required by law to submit returns to the ZPWMA of all the animals taken through a Tourism Hunt Return Form (TR2). All elephants killed through Problem Animal Control (PAC) and recreational hunting are considered as part of the annual off-take quota to ensure that the offtakes are sustainable. Trophies taken on PAC cannot be exported. (p. 31) - Some elephants are taken in communal areas during problem animal management but the off-takes other very low and insignificant. In addition to problem elephant management, other elephant off takes are for training of ZPWMA staff and professional hunters on how to handle dangerous game and again the numbers are very low and insignificant. Private properties have approved Elephant Management Plans but apply for annual sport hunting and management quotas. For example, Save Valley Conservancy has an approved Elephant Management Plan for its closed elephant population. The elephant population is increasing in this closed system. On this private property, culling is done on an annual basis as a management tool to control the elephant population… (p. 31-32) - CONCLUSION: In view of the foregoing, Zimbabwe is making use of the best available scientific information on the status of the African elephant in the country to make non-detriment findings. The current harvest levels are not detrimental to the survival of the species. It is also evident that both quantitative and qualitative data is used in the decisionmaking process. The African elephant population in Zimbabwe is growing and that current levels of trade are not detrimental to the survival of the African elephant in the wild. The species exists and is well monitored throughout its range. In most of the areas where the elephant occurs however there is local over-abundance and severe habitat conversion. The Government of Zimbabwe has recently revised its policies and legislation to promote wildlife conservation and to support local community development programmes. Levels of harvest and quotas for the African elephant are determined through an adaptive management approach, using baseline data, monitoring the impacts of previous harvests and responding to environmental variations. It is evident that quotas and offtake levels for the African elephant fall within very safe and sustainable limits in Zimbabwe. Protocols for monitoring are in place but significant resources are required to carry out regular national aerial surveys. Efforts by the Government of Zimbabwe through the strict management

	regimes and trade controls promote the conservation of not only African elephant but other wildlife species. (p. 49-50)

ZPWMA, Legal Trade, Conservation and Rural Livelihoods: A Zimbabwean Perspective	- A hunting quota is a scientifically determined system of harvesting animals from a population without compromising its biological proliferation. In Zimbabwe determination and implementation of hunting quotas goes through a rigorous quota setting methodology that entails factoring population sizes, property (area) sizes, habitats, national policies among other parameters. With all the set parameters met, it is anticipated that biodiversity and hunting industry are sustained and the economy improves as the country maintains its position as a prime hunting destination. (p. 5)
	- [Factors considered in quota-setting (p. 6)]
	  - 1. CITES National Quota
	  - 2. National aerial survey results
	  - 3. Research publications and preliminary results
	  - 4. Off takes for key species including leopards, lion and elephant
	  - 5. Size of property relative to the species requested and distribution
	  - 6. Illegal Off-take/Poaching
	  - 7. Property based Ecological assessments
	  - 8. Management regime on the properties (habitat, fire, water, land-use planning and zonation, fencing, supplementary feeding).
	  - 9. Human wildlife Conflict hotspots, Communal Benefits and conflict mitigation
	  - 10. Species sensitivity
	  - 11. Other off-takes (illegal management offtakes, live sells)
	  - 12. Trophy Quality
	  - 13. Habitat Change/fragmentation
	  - 14. Recommended sustainable off-take levels
	  - 15. Offtake Data

CAMPFIRE Association Report	- A participatory quota setting methodology adaptively adjusts quotas in response to animal numbers, trophy quality, community monitoring, illegal off-take and safari operator “catch effort”. (p. 3)
CAMPFIRE Income Analysis	- Figure 7: Numerical Elephant Quota and Take Off per District (p. 7)

SOAZ Report	- It is estimated that trophies of 160 sport hunted elephant are imported into the USA from Zimbabwe each year. If the information in Table 1 is extrapolated out for a quota of 160 elephant (I.e. multiply each figure by a factor of 1.45) then we can assume that the financial loss to Zimbabwe of the suspension will be in the region $4,878,452.50. It will have a direct impact on 126 Operators and Professional Hunters, 1132 staff, 355 anti poaching personnel and approximately 155,000 people living in rural communities. (p. 3)

Revenue Utilization

DOCUMENT NAME	SAMPLE OF KEY QUOTATIONS
ZPWMA Apr. 2014 Response	- The Parks and Wildlife Act Chapter 20:14 … recognises any land that is being used for wildlife conservation and designates the legal occupant of that land as Appropriate Authority. On communal lands/tribal Appropriate Authority is accorded to the Rural District Council. Appropriate Authority is the legal right to utilize and manage wildlife on the property under community jurisdiction. (p. 15-16) - The Zimbabwe Parks and Wildlife Management Authority, which is the Government's Agency responsible for managing all wildlife in the country ploughs back all the money into managing conservation and protection of the Parks Estate, which includes the range areas for elephants. (p. 25)
ZPWMA Dec. 2014 Response	- The Parks and Wildlife Act accorded Appropriate Authority status to communal and private property areas with significant wildlife populations which confer user rights to the property owners. Appropriate Authority allows the property owners or tenants to manage and benefit from the wildlife on their land. Local communities through CAMPFIRE programs participate in quota setting workshops in which local communities get the opportunity to learn wildlife management practices from the various technocrats who will be presenting their game management practices. The local communities also get an opportunity to market their offtake to safari operators, which if they get a hunting client, proceeds, are remitted to the community thereby improving their livelihoods. This arrangement incentivizes landowners and tenants to not only tolerate wildlife, but to conserve and promote conservation and protection of wildlife. ZPWMA also provides para-military training to Rural District Council game guards, to equip them with law enforcement and anti-poaching techniques. In the communal areas, ZPWMA is working towards increasing its network of informers to assist in intelligence gathering, a vital tool in the fight against poaching. (p. 20) - The current operating budget is estimated to be in excess of USD28 million. (p. 20)

	- Elephant hunting contributes in excess of USD$ 14 million every year … Approximately, 67% of the annual elephant export quota is allocated to local communities and private sectors with more than half of this going to local communities. It is worth noting that elephants contribute approximately 60% of total hunting revenue by Rural District Councils. Approximately 30% of the Authority's revenue is from hunting, of which the elephant is the major contributor. (p. 21)
ZPWMA July 2015 Response	- ZPWMA has a staff complement of 1,500 field rangers whose core mandate is anti-poaching activities. Table 5 below is an indicative budget for effective protection of the Parks and Wildlife Estates. Table 5: Budget for anti-poaching activities (p. 34-35) - The major sources of [budget] funds [for ZPWMA] are conservation fees (land and river) constituting a total of US$9 898 695 and hunting constituting a total of US$ 4 032 733 for 2014. The bulk of the revenue generated in ZPWMA goes towards staff costs (69%) and operation costs (18%) which translated to US$17,751,988 and USS 4,706,787 respectively for 2014 … Full details are specified in the attached approved budgets for 2015 (p. 36) - Table 7a: ZPWMA Actual and projected Budgets for 2014 and 2015 in USS (p. 37) - Table 7b: Expenditure for ZPWMA (p. 37) - Conservation fees (Park entry and fishing permits) and hunting revenue constitute the bulk of the sources of revenue for ZPWMA, with a contribution of 42% and 17% respectively. (p. 38) - Figure 5a: Main Sources of Revenue for 2014 (p. 38) - Figure 5b: Itemized costs for ZPWMA … Note: See attached approved budgets for 2015 for budget details. (p. 39) - The US hunting market constituted 51% and 54% of the elephant trophy hunting in Zimbabwe for the years 2013 and 2014 respectively. (p. 40) - Figure 6a: Source markets for Safari Hunting in Zimbabwe in 2013 from ZPWMA Database (p. 40) - Figure 7: Source markets for Sport Hunting in Zimbabwe in 2014 from ZPWMA Database (p. 41) - Hunting revenue is distributed by land-use categories as to sustain the upkeep of the land area where it is accrued. These land areas administered by different authorities with the ZPWMA having the overall authority to oversee wildlife use on these areas … Over a four year period revenue collected from hunting contributed a total of US$ 21,339,609. There was a 11.9% decrease in revenue collection from hunting in 2014 compared to 2013. Of all the hunting received the American market is estimated to 54% and is inclusive of concession fees and trophy fees. (p. 41)

<table>
<tr><td></td><td>
- Table 8a: Revenue collected from hunting within the parks Estate 2011 to 2014. (p. 41)
<table>
<tr><td></td><td>2011</td><td>2012</td><td>2013</td><td>2014</td><td>Totals</td></tr>
<tr><td>Total hunting revenue</td><td>5,362,198</td><td>5,144,579</td><td>5,760,339</td><td>5,072,493</td><td>21,339,609</td></tr>
</table>
- Across all land categories, the elephant, even in the private land category where only a small proportion of properties have elephants, accounts for the highest proportion of revenue. Table 12 below highlights elephant populations and revenue generated in the four land use categories in terms of trophy fees … The most important form of revenue is the trophy fees, which average US$ 10,000 per trophy elephant. Other forms of revenue include hunting daily rates and incidental revenue which can raise the value of an elephant hunt up to $25,000.00. (p. 48)
- Table 13: Staff costs incurred in Safari Areas (p. 49)
- The communal areas benefits from wildlife through the CAMPFIRE program. This program is key in that it helps to encourage the communities to co-existence with wildlife. (p. 50)
- During the 2014 hunting season, a total of about US$ 1,419,384.00 (costs including trophy fees, daily rates and concession fees) was realized as revenue from elephant hunts under the CAMPFIRE program. Revenue generated from the CAMPFIRE program is ploughed back into managing and protecting the wildlife resource through activities such as anti-poaching patrols, wildlife censuses and problem animal control (PAC), and wildlife surveys. … Table 14: Distribution of Revenue between Communities, RDC and CAMPFIRE Association. (p. 50-51)
- Table 15: The Distribution of CAMPFIRE Revenue by Communities. (p. 51)
</td></tr>
<tr><td colspan="2"></td></tr>
<tr><td>ZPWMA, Elephant Management Plan (2015-2020)</td><td>
- vi) Local communities: Local communities are involved in elephant management in CAMPFIRE areas, through sharing of information, advocacy and wildlife protection. They report human-elephant conflicts and carryout some of the conflict management activities. (p. 12-13)
- The Importance of Community Based Conservation to the Future of Elephant Management in Zimbabwe: The Community Areas Management Programme for Indigenous Resources (CAMPFIRE) of Zimbabwe has been widely regarded as one of Africa's most successful contemporary conservation initiatives. It permits the residents of communal lands – basically the poor rural communities – to share in the benefits generated by wildlife utilization on those lands by granting Appropriate Authority to Rural District Councils (RDCs) to manage wildlife on communal lands and requiring a certain percentage of revenue to be paid to the wards and councils. CAMPFIRE operates in about 50,000 km2 (12.7%) of land in Zimbabwe. This is roughly equivalent landmass to the Parks and Wildlife Estate. CAMPFIRE encompasses about 777,000 households with an average family size of five, who face food insecurity and deep poverty
</td></tr>
</table>

	(average income $1 a day). Between 1994 and 2012, CAMPFIRE generated $39 million of which $21.5 million was allocated to communities and used for resource management (22%), household benefits (26%), and community projects (52%). About 90% of CAMPFIRE's revenue comes from hunting, with elephant hunting contributing more than 70% of annual revenue. Based on the Constitution of the CAMPFIRE Association as amended in 2007, all major hunting RDCs use CAMPFIRE revenue-sharing guidelines. In these districts safari operators pay revenue directly into community-controlled bank accounts using the following breakdown: CAMPFIRE community share (55%), RDC fees (41%), CAMPFIRE Association levy (4%). Despite its achievements CAMPFIRE still faces fundamental challenges. In particular, the development strategies of households in CAMPFIRE areas focus on land uses that are incompatible with wildlife such as human immigration to rural areas, the extension of basic agricultural schemes and increased livestock numbers. Other CAMPFIRE challenges include: (i) the downturn in Zimbabwe's economy and tourism sector post-2000, (ii) great reliance on consumptive trophy hunting and less focus on other uses and non-consumptive uses of natural resources, (iii) increasing human populations averaging 16-20 people per km^2 in some key wildlife districts, and (iv) lack of re-investment in development, fixed assets, human capital, and management and protection of wildlife in CAMPFIRE areas. Despite these challenges, CAMPFIRE stands very high in the agenda of Zimbabwe's Government, and a review dedicated to improving the programme, including greater devolution of ownership of wildlife to communities, is ongoing and should be finalized by the end of 2015. Zimbabwe's Government recognizes that the survival of wild animals depends entirely on those among whom they live. Unless local people want to save them, wildlife will be poached to the point where just a few remain in fortified reserves. CAMPFIRE is meant to avoid this and the future of wildlife in communal areas rests on the success of this programme. (p. 12-13, Box 2) - 1.3.8 Human elephant conflict: As Zimbabwe's human population grows, elephant are being restricted to smaller areas and as their populations expand they increasingly move out of their designated habitat, and raid crops and sometimes threaten human lives. As a result in many rural areas where elephants exist in Zimbabwe, human-elephant conflicts are increasing, creating substantial negative attitudes to the conservation efforts of elephants. These are often among the poorest rural farmers, which makes the issue complex in social and economic terms. Unresolved conflicts stimulate poaching or retaliation. Poachers or retaliators can be seen as "local heroes" because they provide meat to the communities and resolve the conflict. A major challenge for elephant management is keeping human-elephant conflicts to a minimum. Developing a Social, Economic, and Cultural Framework has been identified as a Key Component of this Action Plan in an effort to address and reduce human-elephant conflicts. (p. 15) - Towards a Comprehensive Strategy to Reduce Human-Elephant Conflict: Some methods of reducing human-elephant conflict focus on curing the effects, not the cause. Such methods include chilli sprays,

	fences, and evening patrols to scare off marauding elephants. However, these are not necessarily long-term solutions. Long-term solutions require growing the tolerance of local communities for elephant by ensuring the communities benefit from having elephant on their lands. Tolerance is likely to increase if communities realise and appreciate economic returns earned from the sustainable use of elephant. Economic returns may be generated by consumptive and non-consumptive tourism. The devolution of decision-making on aspects of problem animal control to communities may result in better outcomes for the management of the costs and benefits of this activity. Problem animal control includes disturbing, removing, translocating, or ultimately killing those elephant that persist in damaging crops or threatening human life. Clearly, no one management option will successfully deal with all problem elephants and conflict situations. As part of this Action Plan, ZPWMA will undertake additional research on problem animal control and minimizing conflict, and will develop new solutions and a more comprehensive response to these issues. (p. 15, Box 4)
ZPWMA, Elephant Management Plan Supplement (2016)	- Table 1: Financial resources deployed up to August 2016 (p. 1) - Table 2: Other Non-Financial Resources (p. 2) - Constraints and Challenges: One of the major challenges regarding implementation of the EMP is with regards to the adoption of stricter domestic measures by the United States of America. This has had the net effect of further reducing the revenue from hunting into the Authority, which therefore affects the budget allocated to resource protection, in particular the elephant in this case. One of the key impediments towards the full and comprehensive implementation of the Elephant Management Plan is the limited resources. However, Zimbabwe is at an advanced stage in the development of resource mobilisation strategies. These strategies include partnering with both local and international institutions in resourcing and financing aspects of the programme. (p. 2-3)
ZPWMA, Non-Detriment Finding (2014)	- In Zimbabwe a foreign hunter buys a bag which may or may not include an elephant. If an elephant is included, the amount paid increases. The amount declines depending on key species in the bag such as leopard and buffalo. A foreign hunter pays to the operator who then pays to the Authority relevant trophy fees where applicable. A hunting permit is only issued to the hunting operator or a private land holder or to communities with Appropriate Authority Status. The foreign hunter only pays for the daily rates and trophy fees to the particular operator they will be hunting with. Both the daily rates and trophy fees vary with the area being hunted, type of animals in the hunting package and the target market of the operator. The daily rate is paid for services received in camp which include accommodation, food and beverages, professional hunter services etc. The hunter also pays government

	levies which are 2% Zimbabwe Tourism Authority levy on daily rate and 4% on trophy fees … The Zimbabwe Parks and Wildlife Management Authority, which is the Government's Agency responsible for managing all wildlife in the country ploughs back all the money into managing conservation and protection of the Parks Estate, which includes the range areas for elephants. (p. 37) - Communities are provided for through the Communal Areas Management Programme for Indigenous Resources of Flora and Fauna. Some of the revenue that accrues to Rural District Councils under this program is ploughed back into wildlife conservation activities in CAMPFIRE areas. Proceeds are used directly for elephant conservation, provision of game water supplies, wildlife monitoring and anti-poaching programs on communal land as well as community development programmes in the form of schools, clinics, roads and other infrastructural development projects. (p. 37) - The centralised command and control approach to law enforcement to protect the elephant is unlikely to work as proved in most parts of Africa. The long-term solution is to ensure greater return of elephants to the community. Conservation of elephants will be achieved as a by-product of the quest for sustainability. (p. 37) - Resources Available For Law Enforcement and Fire Management: A total of 1,346 of the 1,437 recruited rangers were available for deployment against a field ranger establishment of 2,200. The current ranger complement is able to cover 29,120 km^2 giving a variance of 33, 110 km^2 from the total Parks area of 62, 230 km^2. As at 31 December 2013, the Authority had a total of 103 vehicles for field law-enforcement duties and only 69 vehicles were operational. Ideally the Authority should have 150 vehicles dedicated for law enforcement duties. Thirteen (13) of the vehicles were received from donors. The Authority also bought 7 vehicles and 2 boats. 38 radios and 3 repeater links were also procured. Due to financial constraints, the Authority is not able to procure all of its transport (vehicle and fuel) requirements including field equipment and patrol kits. The rangers for field patrols are also not adequate. Table 11 below shows the ranger staffing levels, vehicles and boats status in the Authority in 2013. (p. 39) - Table 11: Status of Rangers, Vehicles and Boats in 2013 (p. 39)
ZPWMA, Legal Trade, Conservation and Rural Livelihoods: A Zimbabwean Perspective	- Zimbabwe's Protected Area Management Funding (table) (p. 10) - As shown in the Table above, CAMPFIRE income is often understated as it is largely recorded based on income receipts from safari hunting only. Economic multipliers like taxidermy, travel, extended tourism activities, food and others, are not captured as part of CAMPFIRE income. The proportion of safari operating expenses paid locally in the form of wages and salaries, and purchase of materials is also not recorded. Income from tourism ventures under CAMPFIRE is also mostly unrecorded, as a result of low investment and returns due to the current downturn in tourism receipts for the country. (p. 17)

	- American clients generally constitute 76% of hunters in CAMPFIRE areas for all animals hunted each year. The suspension of ivory imports from Tanzania and Zimbabwe by the United States of America (USA) in April 2014 resulted in the cancellation of 108 out of 189 (57%) elephant hunts initially booked by US citizens in CAMPFIRE areas. As a result of the ban, CAMPFIRE income dropped to US$2,1 million in 2014, compared to US$2,3 million in 2013, as fewer American hunters conducted their safaris nevertheless in anticipation of the lifting of the ban. However, the ban continued into 2015, resulting in a massive decline of total CAMPFIRE income to US$1,6 million. (p. 19)
CAMPFIRE Association Report	- CAMPFIRE generates on average US$2 million in net income every year … mostly through the lease of sport hunting rights to commercial safari operators (p. 1) - … the CAMPFIRE program at national level still protects an area of wild land in excess of 50,000 km^2, which is roughly equivalent in extent to the Parks and Wildlife Estate (Table 1). There are over 200,000 households that actively participate in the Program in CAMPFIRE hunting areas. Revenue received by communities, though relatively small, is used to directly offset the costs of living with wildlife through employment of game scouts or resource monitors. (p. 2) - Revised CAMPFIRE Revenue Sharing Guidelines, which were incorporated into the Constitution of the CAMPFIRE Association (CA) in 2007, prescribe that at least 55% of revenues should be devolved to producer communities, no more than 26%, and 15% for management and overheads (respectively) at RDC level, and 4% as a levy to the CAMPFIRE Association. At least 10 RDCs are in compliance with the Revenue Guidelines, and in these districts CAMPFIRE revenue is paid directly into community controlled bank accounts by safari operators (Table 4). (p. 3-4) - An analysis of data presented in October 2013 … provides an estimated total of US$2,496,349 from hunting in 2012 (Table 5). Hunting contributes an average of 90% of CAMPFIRE revenue annually. (p. 4) - An assessment of 18 main CAMPFIRE districts allocated hunting quotas for 2014 shows that 106 out of 167 Bull Elephant hunts were booked by US citizens (Table 6). Elephant trophy hunting contributes more than 70% income to the CAMPFIRE program. (p. 4) - Photographic tourism contributes an estimated 1.8% of total CAMPFIRE revenue annually according to 2006 evaluation reports on CAMPFIRE (Table 7). (p. 6) - In all CAMPFIRE districts, revenue from hunting is used to support various management activities such as; fire awareness and purchase of fire-fighting equipment; opening of roads and fireguards; training of committees; look and learn tours to other CAMPFIRE districts; purchase of communication equipment; purchase of firearms for Resource Monitors; and rehabilitation of water supply systems to hunting areas. CAMPFIRE thus contributes to job creation, empowerment, and diversification of livelihoods for rural

	communities. Substantial investments are also made annually by RDCs and safari operators in problem animal control (PAC) and anti-poaching. (p. 8) - Most of the income has been invested in infrastructure which has long term benefits to local communities. Infrastructure such as clinics, schools, and grinding mills, boreholes, roads, fencing to keep out wildlife, has been set up in a number of districts (Table 10). Purchase of tractors and drought relief food by communities has also contributed to food security in many drought prone CAMPFIRE areas. Children benefit from reduced walking distances through the construction of schools in the wards. Others benefit through procurement of learning materials and payment of school fees from CAMPFIRE proceeds. Communities also benefit from meat from safari hunting operations and occasionally from problem animal control. (p. 8-9) - Table 10: Summary of CAMPFIRE Revenue Funded Projects per District (p. 9)
CAMPFIRE Income Analysis	- In 2014, … CAMPFIRE generated a total net hunting income of US$2,102,007 in 13 districts of Zimbabwe that hunt most species, including elephant. … The major hunted species is elephant, which contributed 54% (US$1,138,375.09) of the total income. (p. 1) - Table 1: Income generated by Elephants vs. Total Income; and Percentage Income (p. 2) - Figure 6: Total Hunting Income for 12 Districts: 2009-2014 (p. 5) - As shown in Figure 6, it is highly probable that the decline in hunting income for 2014 was largely caused by the suspension of trophy imports by United States of America. The suspension has a lag effect on income, and preliminary calculations of earnings for 2015 indicate a further continuing decline. The major contributor to hunting income, elephants, had a 52% off-take rate in the 13 districts (animals hunted vs the quota). Seven districts out of 13 had an elephant off-take rate below 50% as shown in Figure 6. (p. 6) - Table 2: Examples of Community Projects funded from CAMPFIRE Revenue: 2010-14 (p. 7-8)
CAMPFIRE—Role of Hunting Report	- The income generated from trophy fees in the last 6 years (2010 – 2015) is approximately US$11.4 million of which elephant trophy fees contributed 65%, while a further US$4 million has come from the sale of hides, concession fees and other sundry income. These funds have been distributed to CAMPFIRE communities in various Wards who received approximately 57% (range 39% - 77%) of the Trophy Fees … At the District level, approximately 80% of the funds are used to support the administration and management of the CAMPFIRE program, including investment on law enforcement. In contrast, 55% of revenues provided to the producer Wards are channeled towards supporting social services such schools,

	clinics and other programs that benefit the community. The cost of living with wildlife, and particularly elephants, is shown through providing data on the scale of crop damage (7,000ha over 6 years) that has a significant impact in terms of its monetary value on rural communities who face food insecurity and deep poverty (average income US$1 a day). 96 human lives were lost to wildlife attacks, with elephant accounting for more than half of those deaths. Yet despite these challenges, communities still retain a high level of tolerance for elephants, but this support is rapidly dissipating as a result of the loss of income from trophy hunting. This places almost two million hectares of wild land at risk, including the risk of increasing retaliatory killing through poisoning and illegal wildlife crime. A way forward is discussed outlining how the resumption of trophy imports can offset the challenges facing the CAMPFIRE program and through this, enhance the conservation of elephant outside of the protected areas. (p. ii)
	- In summary, CAMPFIRE protects about 50,000 km^2 (12.7%) of land in Zimbabwe (Figure 1). Benefits from wildlife and other incomes encompass:
	  - Approximately 777,000 households (25%) in Zimbabwe benefited from CAMPFIRE directly or indirectly;
	  - Approximately 25% of Zimbabwe's people are receiving incentives to conserve wildlife and prevent anti-poaching through CAMPFIRE;
	  - Between 1994 and 2012, CAMPFIRE generated US$39 million of which US$21.5 million was allocated to communities and used for resource management (22%), household benefits (26%), and community projects (52%).
	  - About 90% of CAMPFIRE revenue comes from hunting with elephant hunting contributing up to 70% of annual revenue.
	  - Based on Constitution of the CAMPFIRE Association as amended in 2007, all major RDCs use CAMPFIRE revenue sharing guidelines, and in these districts revenue is paid directly into community controlled bank accounts by safari operators using the following guideline: RDC fees (41%), CAMPFIRE Association Levy (4%), and CAMPFIRE community (55%). (p. 5)
	- The CAMPFIRE program relies almost exclusively on income from hunting. (p. 5)
	- Figure 2: Total allocation of trophy elephant (N=1087) to nine major CAMPFIRE areas over a 6-year period (p. 7)
	- A total of 1,087 elephants have been allocated on quota to nine major CAMPFIRE areas since 2010 (Figure 2). This equates to 180 elephants per year. The distribution of this quota among the nine CAMPFIRE areas is dictated by the relative density of elephants in the neighboring protected areas and those residing in the CAMPFIRE areas. Tsholotsho, for example, that borders the southern boundary of Hwange National Park, was allocated 158 elephants (or 26/year) while Hwange, Binga and Hurungwe

	CAMPFIRE Areas that do not border onto areas of high elephant densities receive approximately 10 elephants/year. (p. 7) - Figure 3: Overall utilization (%) of elephant quotas in nine major CAMPFIRE Areas over a 6-year period (p. 8) - Table 2: Origin of hunting clients visiting the major CAMPFIRE Areas :2010 – 2015. (p. 8) - Figure 4: Contribution of hunting clients to the CAMPFIRE Program (p. 9) - Figure 5: Income (US$) generated from the sale of key trophies (p. 10) - The importance of the income from elephant is clear from these data. Trophy fees from elephant account for 64% of all fees generated from the key species (approximately US$1.2 million/year). Buffalo (20%) are ranked second while leopard, hippo and crocodile contribute approximately 5% each. Noteworthy here is the low contribution of lion (approximately 2%). This low level of income generation is partly a result of the impact of the lion import suspension into the USA and Europe, decreasing quota allocations and decreasing offtake levels brought about by the recently imposed lion age hunting regulations. By comparison, the 897 American clients who hunted in CAMPFIRE Areas in the six-year period paid US$9 million in trophy fees and daily rates. Other nationalities, contributed US$8 million. (p. 10) - RDCs can generate income for other revenue streams, notably receiving a percentage of the daily rate, concession fees, bed night levies from photographic camps and from the lease/rent of equipment (Figure 6). The eight RDCs for which data are available generated approximately US$4 million from these revenue streams. Excluded here are revenues that could have been earned from the sale of ivory recovered from problem animal control (PAC) and natural deaths, and from the distribution of meat estimated at 550,000kg over the 6-year period. (p. 10) - Figure 6: Income (US$) accruing to the RDCs from related income revenue streams (p. 10) - Over the last 6 years, the income generated from trophy fees is approximately US$11 million while a further US$4 million has come from the sale of hides, concession fees and other sundry income. The agreed split of these funds is that not less than 55% of the revenues is paid as Ward dividends, not more than 35% is allocated to the RDC for wildlife management (habitat management, fire control, monitoring, hiring of game scouts, etc.), and 15% is retained by the RDC as an administrative levy. Some RDCs do not consider all these revenues as “CAMPFIRE Funds” and segregate trophy fees from the other revenues. On average, the CAMPFIRE District Wards received 42% (range 23% - 66%) of the combined Concession and Trophy Fees, but the Wards received approximately 58% (range 26% - 77%) of the Trophy Fees (Table 3). (p. 11)

	- Table 3: Summary of the benefit sharing (US$) of hunting related income between RDCs and Wards: 2010 – 2015 (p. 12) - Most RDCs employ Game Scouts to conduct routine patrols and undertake basic law enforcement activities. In most cases this is low key since the CAMPFIRE program relies on members of the community to report incidents of wildlife crime, and any other matters related to wildlife in their respective Wards and villages. (p. 14) - Although the data are incomplete, it is estimated that 7,000ha of crops were destroyed by elephant during the 6-year period under review. It is not possible to accurately place a monetary value to this because crop production varies greatly from one year to the next, and from one region to another. It is important however to take into consideration that the impact of crop destruction in the highly prone drought areas and areas of low rainfall (e.g. Beit Bridge, Binga, Tsholotsho) is more acute than in areas where crop production may be higher. To place this into perspective, the national average maize yield is estimated at 300 – 600kg/ha, and the minimum cash value is US$180/ton. The approximate value of the maize lost is therefore US$500,000 – US$1.0 million … (p. 18) - Table 8: Summary of the extent of human – wildlife conflict recorded in CAMPFIRE Wards: 2010 – 2015 (p. 18) - Table 10: Examples of Social Services funded in selected CAMPFIRE areas from Ward Revenues generated from sport hunting: 2010-15 (p. 20) - The income to CAMPFIRE from the sustainable use of elephants has been declining since 2013, with 2014 registering a significant drop following the announcement of the ban on ivory imports into America (Figure 9). Although the hunting industry responded by seeking alternative markets (e.g. Russia, Middle East), this trend continued through 2015 and unconfirmed reports suggest that the decline has continued in 2016. (p. 22) - Figure 9: Annual income (US$) and offtake of elephants in 10 CAMPFIRE Districts (p. 23) - It is difficult to show concisely how the American ban on importation of elephant ivory from Zimbabwe has contributed to the decline in CAMPFIRE revenue and how hunting has enhanced the conservation of this species, due to the nature of the hunting industry in the CAMPFIRE areas. The hunting sector is integrated across a wide range of socio-economic activities and withdrawing one segment adversely affects a range of other wildlife based activities. Several indicators are provided here to demonstrate this: - 1. The US suspension of ivory imports from Zimbabwe has had a significant impact on CAMPFIRE, and resulted in the cancellation of 108 out of 189 (57%) elephant hunts in all major districts initially

	booked by US citizens in 2014. The net impact of this was a reduction of CAMPFIRE income for all areas from US$2.2m in 2013 to US$1.7m in 2014. A similar pattern prevailed in 2015 (US$1.6m), and a further decline is anticipated in 2016 where outfitters struggled to sell elephant safaris and those that did had to heavily discount their prices. - 2. The key trophy species (elephant, buffalo, leopard, hippo, crocodile and lion) contribute approximately US$1.2 million/year to CAMPFIRE revenues. Elephant account for 64% of these fees. (p. 22) - 3. Quota utilisation of elephant prior to the ban did not exceed 60% of the CAMPFIRE quota allocation. - 4. American hunters make up 53% of the clients in CAMPFIRE areas. - 5. CAMPFIRE producer Wards receive on average 57% of all trophy revenues. - 6. The CAMPFIRE hunting industry in the 9 RDCs covered in this analysis directly supports 104 producer Wards, representing 737 villages or 85,847 households. - 7. The CAMPFIRE program employs managers, officers and game scouts at both the District and Ward level who are responsible for monitoring wildlife based land use activities in their areas and these are directly paid from safari hunting income. - 8. Both RDCs and Wards invest in a variety of equipment that benefits communities and wildlife management. The operational and maintenance costs for this equipment are drawn from safari hunting income. - 9. RDCs utilise 80% of the CAMPFIRE revenues to support administration and management of the program. 20% is invested in global social services that benefit communities at the District level. - 10. Producer Wards, representing approximately 2.6 million hectares, bear the cost of living with wildlife. Under the 6-year period under review, elephants are responsible for the destruction of approximately 7,000ha of croplands in the 9 Districts. The minimum cost of this in terms of food production is estimated at US$500,000 – US$1.0 million. - 11. Producer Wards have elected to invest 55% of their dividends from CAMPFIRE revenues in social services (schools, clinics etc.). 74% of these revenues are generated through trophy fees where elephant play a significant role. - 12. Although CAMPFIRE communities suffer most from elephant crop damage, the number of elephant destroyed as problem animals is well within acceptable limits and with few exceptions, has little or no impact on population numbers. (p. 23) - In conclusion, the CAMPFIRE program relies almost exclusively on revenues generated through hunting. These revenues cannot be replaced through alternative wildlife based activities. This places almost two million hectares of wild land at risk, including the risk of increasing retaliatory killing through poisoning

	and illegal wildlife crime. Wildlife in Communal Lands is under pressure. Removing any benefits will tip the balance and disgruntled CAMPFIRE communities will turn to pastoralism and unsustainable agricultural practices, thereby reducing wildlife habitat. The suspension of trophy imports is effectively encouraging communities to become willing tools for poaching – a forced abandonment of CAMPFIRE. (p. 23) - The presence of regulated hunting can also reduce illegal activities, and private outfitters' lease agreements are being reviewed to include anti-poaching as an obligation of the concessionaire. Trophy hunting revenues are vital to facilitating not only law enforcement activities but also general wildlife management. Alternative wildlife land use practices, e.g. eco-tourism, cannot generate sufficient revenues to cover these costs, and certainly not to justify wildlife as a land use outside of protected areas. Hunting can generate revenues under a wider range of scenarios than eco-tourism, including in remote areas lacking infra-structure, attractive scenery, or high densities of viewable wildlife. Consequently, elephant and other wildlife populations will be negatively affected through reduced conservation efforts arising from low funding and reduced goodwill from the communities. CAMPFIRE has been widely regarded as one of Africa's most successful contemporary conservation initiatives. Hunting of elephants plays an integral part in promoting CAMPFIRE as it permits the residents of communal lands to share in the benefits generated by wildlife utilization on those lands. (p. 24) - As shown above, the bulk of CAMPFIRE's revenue comes from hunting, with elephant hunting contributing more than 60% of annual revenue. The current revenue sharing guidelines require safari outfitters to pay revenue directly into community-controlled bank accounts and this has had a positive impact on community attitudes to wildlife conservation. These funds have been used by RDCs and producer Wards to promote wildlife conservation, but despite its achievements, CAMPFIRE still faces fundamental challenges. The most crucial of these challenges is developing strategies to accommodate the increasing human populations averaging 16-20 people per km^2 in some key CAMPFIRE areas. Understandably, the focus of these households is on food security requiring the extension of basic agricultural schemes and increased livestock numbers. Such land uses are incompatible with wildlife based land use … Despite these challenges, CAMPFIRE stands very high in the agenda of Zimbabwe's Government, and an evaluation dedicated to improving the program is ongoing and should be finalized by the end of 2017. Zimbabwe's Government recognizes that the survival of wild animals depends entirely on those among whom they live. Unless local people want to save them, wildlife will be poached to the point where just a few remain in fortified reserves. CAMPFIRE is meant to avoid this and the future of wildlife in communal areas rests on the success of this program. (p. 24) - The hunting of elephants, under sustainable and well-regulated conditions, has the potential to raise adequate funds to support itself and other species in CAMPFIRE areas. For these reasons, Zimbabwe

<table>
<tr><td></td><td>confirms its commitment to the sustainable use of elephant and other wildlife in its Elephant Management Plan, and recognizes the role that elephant play in the CAMPFIRE program. (p. 25)</td></tr>
<tr><td colspan="2"></td></tr>
<tr><td>SOAZ Report</td><td>
- The results of questionnaire responses from 14 safari operators indicate that for the 110 elephant on quota between them, there will be a combined financial loss of $3,364,450 to them and to Zimbabwe (Table 1). This will have a direct impact on 87 operators and Professional Hunters, 781 Staff, 245 Anti poaching personnel and approximately 108,000 people in rural communities living with elephants. (p. 3)
- Table 1. Results to show the number of dependents, elephant on quota and the loss of revenue and hunting days as a result of the US Fish & Wildlife Services suspension on import of elephant trophies for 14 Safari Operators in Zimbabwe (p. 3)
<table>
<tr><th colspan="4">Dependents</th><th rowspan="2">Number of Elephant on Quota</th><th rowspan="2">Hunting Days Lost Suspension</th><th rowspan="2">Value of Loss</th></tr>
<tr><th>Operator & PH's</th><th>Staff</th><th>Anti Poaching</th><th>Com-munity</th></tr>
<tr><td>87</td><td>781</td><td>245</td><td>108312</td><td>110</td><td>1430</td><td>US$3,364,450.00</td></tr>
</table>
- It is estimated that trophies of 160 sport hunted elephant are imported into the USA from Zimbabwe each year. If the information in Table 1 is extrapolated out for a quota of 160 elephant (I.e. multiply each figure by a factor of 1.45) then we can assume that the financial loss to Zimbabwe of the suspension will be in the region $4,878,452.50. It will have a direct impact on 126 Operators and Professional Hunters, 1132 staff, 355 anti poaching personnel and approximately 155,000 people living in rural communities. (p. 3)
- Table 2 shows that the 14 Safari Operators that responded to the questionnaire spent a combined total of $957,843.00 on anti poaching in their areas and this employs 245 people specifically for anti poaching. (p. 4)
- Table 2. The expenditure on Anti Poaching and number of Anti Poaching personnel employed by 14 Safari Operators in Zimbabwe (p. 4)
<table>
<tr><th>Anti Poaching expenditure – 2013</th><th>Anti Poaching Personnel Employed</th></tr>
<tr><td>US$957,843.00</td><td>245</td></tr>
</table>
- As in Section 3, if these figures are extrapolated out to give figures relative to the 160 sport hunted elephant imported into the USA each year from Zimbabwe, we can make the assumption that US hunters are assisting with the funding of $1,388,872.35 towards anti poaching in Zimbabwe through their safari
</td></tr>
</table>

	payments and that this is enabling the employment of 355 anti poaching personnel along with all the equipment and support required. The imposed suspension on the import of sport hunted elephant into the USA from Zimbabwe will have a significant detrimental impact on these figures and in many cases the anti poaching efforts will not be sustained. (p. 4)
FWS Press Release	- Legal, well-regulated sport hunting, as part of a sound management program, can benefit the conservation of listed species by providing incentives to local communities to conserve the species and by putting much-needed revenue back into conservation. At this time, the Service does not have conservation concerns with African elephant sport hunting in Namibia, South Africa, or Botswana; though it should be noted that Botswana is not currently open to elephant sport hunting.

Local Conservation Efforts

DOCUMENT NAME	SAMPLE OF KEY QUOTATIONS
ZPWMA Apr. 2014 Response	- The Parks and Wildlife Act Chapter 20:14 … recognises any land that is being used for wildlife conservation and designates the legal occupant of that land as Appropriate Authority. On communal lands/tribal Appropriate Authority is accorded to the Rural District Council. Appropriate Authority is the legal right to utilize and manage wildlife on the property under community jurisdiction. (p. 15-16)
ZPWMA Dec. 2014 Response	- The Parks and Wildlife Act accorded Appropriate Authority status to communal and private property areas with significant wildlife populations which confer user rights to the property owners. Appropriate Authority allows the property owners or tenants to manage and benefit from the wildlife on their land. Local communities through CAMPFIRE programs participate in quota setting workshops in which local communities get the opportunity to learn wildlife management practices from the various technocrats who will be presenting their game management practices. The local communities also get an opportunity to market their offtake to safari operators, which if they get a hunting client, proceeds, are remitted to the community thereby improving their livelihoods. This arrangement incentivizes landowners and tenants to not only tolerate wildlife, but to conserve and promote conservation and protection of wildlife. ZPWMA also provides para-military training to Rural District Council game guards, to equip them with law enforcement and anti-poaching techniques. In the communal areas, ZPWMA is working towards increasing its network of informers to assist in intelligence gathering, a vital tool in the fight against poaching. (p. 20) - ZPWMA strongly believes that local effort has played a major role in elephant conservation.

	- Safari operators in the field are cooperating with Government agencies in anti-poaching and intelligence gathering. Very often they generally provide transport and other resources to rangers. - NGOs have played a pivotal role in supporting elephant surveys, game water supply and research. - Private owned conservancies provide key habitats for elephants outside the protected area system, including law enforcement and research into elephant population dynamics. In some communal areas, land has been set aside as wildlife management areas. Many farmers with wildlife on their properties are receiving technical assistance on wildlife conservation including intensive breeding and ranching operations. (p. 25) - Fundamentally, ZimParks supports local efforts by providing a conducive legislative and policy environment which allows the private and community sectors to thrive. The granting of Appropriate Authority Status to private properties and Rural District Councils is a case in point. - In addition, we also do the following: - share anti-poaching intelligence with the stakeholders - hold joint patrols and send reinforcements when required - restocking - offer technical advisory services - collaborate in implementing the TFCA Programme - Partnerships and joint ventures (p. 26) - Mechanisms have been put in place such as tax incentives to promote and sustain efforts across Zimbabwe's elephant range. The Parks and Wildlife Act accorded Appropriate Authority status to communal and private properties areas with significant wildlife populations which confers user rights to the property owners. Appropriate Authority allows the property owners or tenants to manage and benefit from the wildlife on their land in a coordinated manner. This arrangement gives incentives to landowners and tenants to not only tolerate wildlife, but to conserve and promote conservation and protection of wildlife. The Wildlife Based Land Reform Policy and other related policies; measures have been put in place to encourage wildlife production in areas that are not suitable for agriculture… (p. 26)
ZPWMA July 2015 Response	- The communal areas benefits from wildlife through the CAMPFIRE program. This program is key in that it helps to encourage the communities to co-existence with wildlife. (p. 50)
ZPWMA, Elephant Management Plan 2015-2020	- The Role of Sport Hunting in Elephant Conservation: Elephants are a charismatic species but can also be destructive when they destroy crops, threaten livestock and even human lives. To have a future, elephants must have value. Value to the governing authorities and to the local people. The greater the

	value, the greater the tolerance of them is likely to be. The local people who live closest to them will determine the long-term survival of species like elephant. Regulated sport hunting converts wildlife into assets for the benefit of local people and the country as a whole. Wildlife can be a most valuable asset and in turn empower local communities and provide basic necessities. When it is viewed as a valuable asset, wildlife becomes an economically competitive land use in Zimbabwe, which leads to habitat preservation instead of habitat destruction and conversion to agriculture or livestock production. Game animals have a survival advantage because of user-pay stewardship systems where use revenue generated from tourist hunters is paid through to wildlife authorities and local communities. The presence of regulated hunting can also reduce illegal activities. Many hunting operators in Zimbabwe have specialised anti-poaching units. Private operators' lease agreements are being reviewed to include anti-poaching as an obligation of the concessionaire. Regulated hunting is the opposite of poaching. One is a lawful activity designed by government wildlife authorities and experts to perpetuate resources and the other is prohibited thievery outside of and away from the system. The first is like making a bank deposit and the second is like a bank robbery, without sustainable limits. Trophy hunting revenues are vital because there are not enough tourists to otherwise generate income to support all protected areas. Eco-tourism revenues are typically sufficient to cover the costs of only some of the parks and certainly not to justify wildlife as a land use outside of protected areas. Hunting is able to generate revenues under a wider range of scenarios than eco-tourism, including in remote areas lacking infra-structure, attractive scenery, or high densities of viewable wildlife. Consequently, elephant and other wildlife populations will be negatively affected through reduced conservation efforts arising from low funding and reduced goodwill from the communities, when in reality the elephant has the economic potential to raise adequate funds to support itself and other species. For these reasons, Zimbabwe confirms its commitment to the sustainable use of elephant and other wildlife in this Action Plan. (p. 12, Box 1) - v) Private sector: The corporate community participates in elephant management mainly through resource mobilization. Safari operators report poaching and assist in anti-poaching patrols. Through lease and trophy fees they provide revenue to ZPWMA. They help develop infrastructure, provide funds to communities and supplement diets with meat from trophy animals. Zimbabwe subscribes to the principle of sustainable utilisation of wildlife resources including elephants. Sport hunting is the principal form of wildlife utilisation whereby offtakes are adaptively managed and monitored through a participatory and science based process. This process allows for sustainable offtakes, and rigorous resource monitoring programmes that allow recruitment within a population to ensure the continued survival of the population in the wild. The high economic value conferred to the elephant through consumptive utilisation has also resulted in increased tolerance by local communities. (p. 12)

ZPWMA, Non-Detriment Finding (2014)	- The centralised command and control approach to law enforcement to protect the elephant is unlikely to work as proved in most parts of Africa. The long-term solution is to ensure greater return of elephants to the community. Conservation of elephants will be achieved as a by-product of the quest for sustainability. (p. 37)
SOAZ Report	- We have received information from fourteen safari operators in Zimbabwe. The operations of these companies cover a wide range of safari concessions including Government Safaris Areas, Campfire Areas and Private Conservancies. They also include safari concessions in the three main wildlife systems in Zimbabwe being; (1) Zambezi Valley and Sebungwe, (2) the North West including Hwange/Matetsi/Vic Falls and (3) the South & South East Lowveld including Gonarezhou, Save Valley Conservancy & Bubye Conservancy. (p. 1) - The results of questionnaire responses from 14 safari operators indicate that for the 110 elephant on quota between them, there will be a combined financial loss of $3,364,450 to them and to Zimbabwe (Table 1). This will have a direct impact on 87 operators and Professional Hunters, 781 Staff, 245 Anti poaching personnel and approximately 108,000 people in rural communities living with elephants. (p. 3) - While National Parks provide the primary refuge for elephant populations in Zimbabwe, a significant proportion of elephant live in the safari areas which are generally more marginal in terms of wildlife numbers and often have large rural human populations within or adjacent to them. The role of safari operations in providing a benefit to such communities and enforcing anti poaching as a means of maintaining elephant and other wildlife populations in these areas cannot be underestimated. (p. 4)
FWS Press Release	- In Zimbabwe, available data, though limited, indicate a significant decline in the elephant population. Anecdotal evidence, such as the widely publicized poisoning last year of 300 elephants in Hwange National Park, suggests that Zimbabwe's elephants are also under siege. - Legal, well-regulated sport hunting, as part of a sound management program, can benefit the conservation of listed species by providing incentives to local communities to conserve the species and by putting much-needed revenue back into conservation. At this time, the Service does not have conservation concerns with African elephant sport hunting in Namibia, South Africa, or Botswana; though it should be noted that Botswana is not currently open to elephant sport hunting.

RCVD AUG 16 2016

OMB No. 1018-0093
Expires 05/31/2017

Department of the Interior
U.S. Fish and Wildlife Service

Federal Fish and Wildlife Permit Application Form

Return to: U.S. Fish and Wildlife Service
Division of Management Authority (DMA)
Branch of Permits, MS: IA
5275 Leesburg Pike
Falls Church, VA 22041-3803
1-800-358-2104 or 703-358-2104

Type of Activity:
Import of Sport-hunted Trophies of Southern African Leopard, African Elephant, and Namibian Southern White Rhinoceros

Complete Sections A or B, and C, D, and E of this application. U.S. address may be required in Section C, see instructions for details.
See attached instruction pages for information on how to make your application complete and help avoid unnecessary delays.

A. Complete if applying as an individual

1.a. Last name	1.b. First name	1.c. Middle name or initial	1.d. Suffix
Yacobucci	Dean	(b) (6)	

2. Date of birth (mm/dd/yyyy)	3. Social Security No.	4. Occupation	5. Affiliation/ Doing business as (see instructions)
(b) (6)			

6.a. Telephone number	6.b. Alternate telephone number	6.c. Fax number	6.d. E-mail address
(b) (6)			(b) (6)

B. Complete if applying on behalf of a business, corporation, public agency, Tribe, or institution

1.a. Name of business, agency, Tribe, or institution	1.b. Doing business as (dba)

2. Tax identification no.	3. Description of business, agency, Tribe, or institution

4.a. Principal officer Last name	4.b. Principal officer First name	4.c. Principal officer Middle name/ initial	4.d. Suffix

5. Principal officer title	6. Primary contact name

7.a. Business telephone number	7.b. Alternate telephone number	7.c. Business fax number	7.d. Business e-mail address

C. All applicants complete address information

1.a. Physical address (Street address; Apartment #, Suite #, or Room #; no P.O. Boxes)
(b) (6)

1.b. City	1.c. State	1.d. Zip code/Postal code:	1.e. County/Province	1.f. Country
East Aurora	NY	(b) (6)		US

2.a. Mailing Address (include if different than physical address; include name of contact person if applicable)

2.b. City	2.c. State	2.d. Zip code/Postal code:	2.e. County/Province	2.f. Country

D. All applicants MUST complete

1. Attach check or money order payable to the U.S. FISH AND WILDLIFE SERVICE **in the amount of $100, nonrefundable processing fee**. Federal, Tribal, State, and local government agencies, and those acting on behalf of such agencies, are exempt from the processing fee – ***attach documentation of fee exempt status as outlined in instructions.*** (50 CFR 13.11(d))

2. Do you currently have or have you ever had any Federal Fish and Wildlife permits?
Yes ☐ If yes, list the number of the most current permit you have held or that you are applying to renew/re-issue: _____ No ☒

3. Certification: I hereby certify that I have read and am familiar with the regulations contained in ***Title 50, Part 13 of the Code of Federal Regulations*** and the other ***applicable parts in subchapter B of Chapter I of Title 50***, and I certify that the information submitted in this application for a permit is complete and accurate to the best of my knowledge and belief. I understand that any false statement herein may subject me to the criminal penalties of 18 U.S.C. 1001.

Signature (in blue ink) of applicant/person responsible for permit (No photocopied or stamped signatures) — Date of signature (mm/dd/yyyy): 08/11/2016

Please continue to next page

E. IMPORT OF SPORT-HUNTED TROPHIES OF SOUTHERN AFRICAN LEOPARD, AFRICAN ELEPHANT, AND NAMIBIAN SOUTHERN WHITE RHINOCEROS

Note 1: If you hold an import permit for trophy/trophies that you did not use, please **return the unused original permit**. If you are requesting reissuance of a permit because you have taken a trophy, but were unable to import it prior to the expiration of the permit, please use the renewal form (3-200-52; http://www.fws.gov/international/permits/by-form-number/index.html) and return your original permit with that form.

Note 2: The U.S. FWS has determined that a trophy consists of raw or tanned parts of a specimen taken by a hunter during a sport hunt for personal use. It may include the bones, claws, hair, head, hide, hooves, horns, meat, skull, teeth, tusks, or any taxidermied part, including, but not limited to, a rug or taxidermied head, shoulder, or full mount. It does not include articles made from a trophy, such as worked, manufactured, or handicraft items for use as clothing, curios, ornamentation, jewelry, or other utilitarian items. If you wish to import such products, please contact the Division of Management Authority for the proper application form.

Note 3: Certain hunting trophies, including leopard, elephant, and rhinoceros hunting trophies, are subject to restrictions on their use after import into the United States. Please see 50 CFR 23.55 for more information or contact the Division of Management Authority.

Please provide the following information. Complete all questions on the application. Mark questions that are not applicable with "N/A". If applying for more than one trophy, be sure to answer questions 2 and 3 for each trophy. If importing trophies from more than one country, you must submit a separate application for each shipment in order to obtain separate import permits.

1. ENTER the quantity next to the name of the species you are applying to import (you may apply to import specimens of more than one species provided they have been/are being hunted in the same country):

Leopard (*Panthera pardus*) Quantity: _____ (Limited to the import of two per calendar year)

African elephant (*Loxodonta africana*) Quantity: 1 (Import permit is not required for trophies harvested in Botswana, Namibia, South Africa, or Zimbabwe). **Note: once imported, ivory cannot be re-exported.**

Southern white rhinoceros (*Ceratotherium simum simum*) from Namibia Quantity: _____ (An import permit is not required for trophies harvested in South Africa or Swaziland. If you are looking to import from a different country, please use form 3-200-37).

2. **IF ANIMAL IS CURRENTLY LIVING IN THE WILD**, please enter the following:
   a. Country and place (area, region, GIS coordinates, ranch AND nearest city) where wildlife is to be taken from the wild:

   b. Date wildlife is to be hunted:

   c. Description of the trophy and parts you intend to import (e.g., skin, skull, shoulder mount, life size mount, claws, horns, tusks).

3. **IF THE ANIMAL IS DEAD**, please enter the following:
   a. Country and place (area, region, GIS coordinates, ranch, and/or AND nearest city) where trophy was removed from the wild: Impalila, Namibia
   b. Date wildlife was hunted: 8-18-2015

c. Description of the trophy and parts you intend to import (e.g., skin, skull, shoulder mount, life size mount, claws, horn, tusks): tusks, molars, lower jaw bone, skin, tail, four feet

ISO codes NA IS 0060 12.70 NA IS 0059 13.10

d. The current location of the trophy (address and country) [the U.S. import permit will identify this country as the country of export/re-export and must match with the export/re-export document]:

Reiser Taxidermy
P.O. Box 11908
Windhoek, Namibia 9000

4. Complete name and address of overseas person or business shipping the trophy to you. If you are applying to import a trophy directly from Namibia, you **must** provide the name and address of the professional hunter listed on your Namibian hunting permit [this name will appear on the face of the export permit].

Name:	Reiser Taxidermy/Shipping	professional hunter
Business Name:		Tobie Engelbrecht
Address:	P.O. Box 11908	P.O. Box 66
Address:		
City:	Windhoek	Tsumeb, Namibia
State/Province:	Namibia 9000	
Country, Postal Code:		

5. Please be aware that the U.S. Fish and Wildlife Service may need to make a finding that your activities will enhance or benefit wild populations of the species involved. If you have any information that could support this finding (e.g., how the funds from license/trophy fees will be spent, what portion of the hunting fee will support conservation), please submit such information on a separate page with your application.

CERTIFICATION STATEMENT (original signature must be provided for either 6 or 7 below)

6. **If you are a broker or taxidermist applying on behalf of a foreign national,** provide documentation to show you have a **Power of Attorney** to act on your client's behalf and sign the following statement.

I acknowledge that the sport-hunted trophy/trophies to be imported has been/will be personally hunted by my client and is being imported only for my client's personal use (i.e., **not for sale, transfer, donation, or exchange that is reasonably likely to result in economic use, gain, or benefit**). I understand that my client may only import two leopard trophies in one calendar year (if applicable). In addition, I have advised my client that raw ivory, once imported into the United States, cannot be re-exported.

Taxidermist/Broker's signature: _____ Date: _____

7. **If you are the hunter applying to import your own trophy**, please read and sign the following statement.

I acknowledge that the sport-hunted trophy/trophies to be imported has been/will be personally hunted by me and is being imported only for my personal use (i.e., **not for sale, transfer, donation, or exchange that is reasonably likely to result in economic use, gain, or benefit**). I understand that I may only import two leopard trophies in one calendar year (if applicable). In addition, I understand that raw ivory, once imported into the United States, cannot be re-exported.

Applicant's signature: _____ Date: 8-11-2016

Be aware that there may be additional permitting or approval requirements by your local or state governments, as well as required by other Federal agencies or foreign government to conduct your propose activity. While the Service will attempt to assist where possible, it is your responsibility to obtain such approval.

8. All international shipment(s) must be through a designated port. A list of designated ports (where an inspector is posted) is available from http://www.fws.gov/le/designated-ports.html. If you wish to use a port not listed, please contact the Office of Law Enforcement for a Designated Port Exemption Permit (form 3-200-2).

9. Name and address where you wish the permit to be mailed, if different from page 1 (All permits will be mailed via the U.S. Postal Service, unless you identify an alternative means below):

10. If you wish the permit to be delivered by means other than USPS regular mail, provide an air bill, pre-paid envelope, or billing information. If you do not have a pre-paid envelope or air bill and wish to pay for a courier service with your credit card, please check the box below. Please DO NOT include credit card number or other information; you will be contacted for this information.

☐ If a permit is issued, please send it via a courier service to the address on page 1 or question 9. I understand that you will contact me for my credit card information once the application has been processed.

11. Who should we contact if we have questions about the application? (Include name, phone number, and email):

Dean Yacobucci
(b) (6) [redacted]

12. **Disqualification Factor**. A conviction, or entry of a plea of guilty or nolo contendere, for a felony violation of the Lacey Act, the Migratory Bird Treaty Act, or the Bald and Golden Eagle Protection Act disqualifies any such person from receiving or exercising the privileges of a permit, unless such disqualification has been expressly waived by the Service Director in response to a written petition. (50 CFR 13.21(c)) Have you or any of the owners of the business, if applying as a business, been convicted, or entered a plea of guilty or nolo contendere, forfeited collateral, or are currently under charges for any violations of the laws mentioned above?

☐ Yes ☒ No If you answered "Yes" provide: a) the individual's name, b) date of charge, c) charge(s), d) location of incident, e) court, and f) action taken for each violation.

To: US Fish and Wildlife Service

From: Dean Yacobucci(b) (6)

Re: Support of permit to import African Elephant

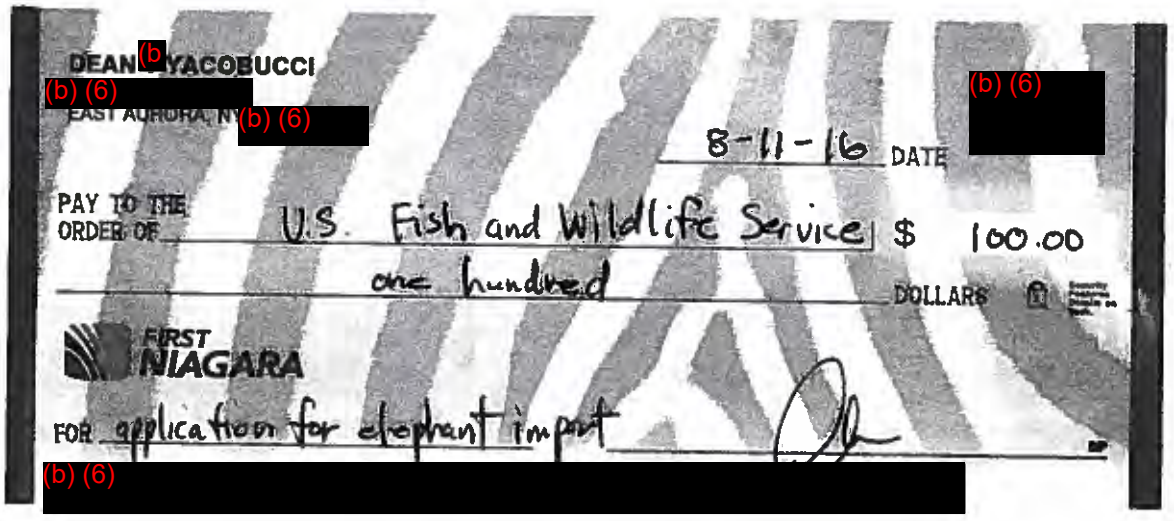
To whom it may concern,

The African Elephant that I harvested was taken in the Eastern Caprivi region of Namibia, which is currently known for its healthy elephant population and Namibia is well-known for its low poaching activity. The conservancy it was taken in is administered by the indigenous peoples and well established conservation policies are in force. Literally, within minutes of harvesting the elephant, natives were present to obtain the elephant meat. The taking of game animals provides needed protein for the local inhabitants and at least 100 villagers were quickly present to obtain the meat, some were even refugees from Zambia. In four hours all the elephant meat was gone, taken away by the villagers. In addition to the meat, the tribal conservancy benefits from monies that are paid to it from the harvest of the game animals in their area. While in that conservancy, I harvested a Buffalo exclusively for the tribal Chief to be used in his yearly celebration. A hippo was also later taken. All the meat and the monies from these additional animals went as well to the local populous to fund building infrastructure, conservation measures, and crime prevention including control of the poaching of game animals. I was personally thanked by the regional tribal chief for my support of their community.

Sincerely,

Dean Yacobucci

RCVD AUG 16 2016



OMB Control #1018-0093 Expires: 05/31/2017

ELEPHANT IMPORT FROM NAMIBIA

Permit Number: MA04322C-0

Effective: 10/07/2016 Expires: 10/06/2017

Issuing Office:

Department of the Interior
U.S. FISH AND WILDLIFE SERVICE
DIVISION OF MANAGEMENT AUTHORITY
BRANCH OF PERMITS, MS: IA
5275 LEESBURG PIKE
FALLS CHURCH VA 22041-3803

Mary Ceglian

FOR
CHIEF, BRANCH OF PERMITS, DMA

Permittee:
DEAN (b) (6) YACOBUCCI
(b) (6)
EAST AURORA, NY (b) (6)
U.S.A.

Authority: Statutes and Regulations: 16 USC 1539 (a); 50 CFR 17.40 (e).

Location where authorized activity may be conducted:
IMPORT THROUGH ANY PORT LISTED IN 50 CFR 14.12

Reporting requirements: Not applicable

Conditions and Authorizations:

A. General conditions set out in Subpart D of 50 CFR 13, and specific conditions contained in Federal regulations cited above, are hereby made a part of this permit. All activities authorized herein must be carried out in accord with and for the purposes described in the application submitted. Continued validity, or renewal of this permit is subject to complete and timely compliance with all applicable conditions, including the filing of all required information and reports.

B. The validity of this permit is also conditioned upon strict observance of all applicable foreign, state, local, tribal, or other federal law.

C. Valid for use by permittee named above.

D. Acceptance of this permit serves as evidence that the permittee understands and agrees to abide by the "General Permit Conditions" (copy attached).

E. Authorized to import the sport-hunted trophy of one African elephant (*Loxodonta africana*), taken in Namibia for the purpose of enhancement of the survival of the species.

F. Specimen may not be sold or transferred for any financial remuneration.

G. U.S. Threatened Species: tusks must be marked as per [50 CFR 17.40(e)]. In accordance with the African Elephant Conservation Act, raw ivory, including sport-hunted trophies that are wholly or partially ivory, may not be re-exported from the U.S.

H. **Trophy must have been taken during the 2015 hunting season.**

I. Trophy must be accompanied by a valid Convention on International Trade in Endangered Species (CITES) Appendix II export permit issued by the Management Authority of Namibia.

OCT 1 7 2017

October 6, 2017

To: US Fish and Wildlife Service

From: Dean Yacobucci

Re: Permit Renewal Permit Number MA04322C-0

Dear Officer,

Over 1 year ago I applied for and was issued Permit MA04322C-0 for the Import of Elephant from Namibia. The taxidermist and shipper were aware of the expiration date of the permit as 10/06/2017 for months and the trophies had been ready for export for weeks. Despite this, the trophies were finally transferred to the airport cargo hold in Namibia as the permit was due to expire. At the risk of not having them arrive before the permit expired, a stop was put on their transport from Namibia on the last day of the permit. Please renew the existing permit that has expired. There have been no changes from the original application.

Thank you,

Dean Yacobucci
(b) (6) [redacted]
East Aurora, NY (b) (6) [redacted]
(b) (6) [redacted]

OCT 1 7 2017

Department of the Interior
U.S. Fish and Wildlife Service

OMB No. 1018-0093
Expires 05/31/2017

Federal Fish and Wildlife Permit Application Form

Return to: U.S. Fish and Wildlife Service
(Enter address from pages 5 and 6 of application)

Type of Activity:
REISSUANCE, RENEWAL, OR AMENDMENT OF A PERMIT
(For this application, all permits, registrations, and certificates are referred to as a permit.)

Complete Sections A or B, C, D, and E of this application. U.S. address may be required in Section C, see instructions for details.
See attached instruction pages for information on how to make your application complete and help avoid unnecessary delays.

A. Complete if applying as an individual

1.a. Last name	1.b. First name	1.c. Middle name or initial	1.d. Suffix
Yacobucci	Dean	(b) (6)	

2. Date of birth (mm/dd/yyyy)	3. Social Security No.	4. Occupation	5. Affiliation/ Doing business as (see instructions)
(b) (6)			

6.a. Telephone number	6.b. Alternate telephone number	6.c. Fax number	6.d. E-mail address
(b) (6)			(b) (6)

B. Complete if applying on behalf of a business, corporation, public agency, Tribe, or institution

1.a. Name of business, agency, Tribe, or institution	1.b. Doing business as (dba)

2. Tax identification no.	3. Description of business, agency, Tribe, or institution

4.a. Principal officer Last name	4.b. Principal officer First name	4.c. Principal officer Middle name/ initial	4.d. Suffix

5. Principal officer title	6. Primary contact name

7.a. Business telephone number	7.b. Alternate telephone number	7.c. Business fax number	7.d. Business e-mail address

C. All applicants complete address information

1.a. Physical address (Street address; Apartment #, Suite #, or Room #; no P.O. Boxes)
(b) (6)

1.b. City	1.c. State	1.d. Zip code/Postal code:	1.e. County/Province	1.f. Country
East Aurora	NY	(b) (6)		USA

2.a. Mailing Address (include if different than physical address; include name of contact person if applicable)

2.b. City	2.c. State	2.d. Zip code/Postal code:	2.e. County/Province	2.f. Country

D. All applicants MUST complete

1. Attach check or money order payable to the U.S. FISH AND WILDLIFE SERVICE **in the amount indicated on pages 6 and 7**. Federal, Tribal, State, and local government agencies, and those acting on behalf of such agencies, are exempt from the processing fee – ***attach documentation of fee exempt status as outlined in instructions.*** (50 CFR 13.11(d))

2. Do you currently have or have you ever had any Federal Fish and Wildlife permits?
Yes [X] If yes, list the number of the most current permit you have held or that you are applying to renew/re-issue: MA04322C-0 No [ ]

3. Certification: I hereby certify that I have read and am familiar with the regulations contained in ***Title 50, Part 13 of the Code of Federal Regulations*** and the other ***applicable parts in subchapter B of Chapter I of Title 50***, and I certify that the information submitted in this application for a permit is complete and accurate to the best of my knowledge and belief. I understand that any false statement herein may subject me to the criminal penalties of 18 U.S.C. 1001.

Signature (in blue ink) of applicant/person responsible for permit (No photocopied or stamped signatures) — Date of signature (mm/dd/yyyy): 10-10-2017

E. REISSUANCE, RENEWAL, OR AMENDMENT OF A PERMIT (For this application, all permits, registrations, and certificates are referred to as a permit.)

NOTE 1: If you are renewing your Designated Port Exemption permit, use form 3-200-2 (http://www.fws.gov/forms/3-200-2.pdf) and submit to appropriate Office of Law Enforcement address. If you are renewing your Import/Export license (required for commercial activities), use form 3-200-3 (http://www.fws.gov/forms/3-200-3.pdf) and submit to appropriate Office of Law Enforcement address.

NOTE 2: This form **cannot** be used for lost or damaged permit. If you need to replace a lost or damaged permit, please use form 3-200-66, http://www.fws.gov/international/pdf/permit-application-form-3-200-66-replacement-document.pdf. The application **must** be submitted to the office that issued the initial permit. Lost or damaged permit

NOTE 3: Some activities, such as all master files for multiple shipments, Certificate of Scientific Exchange (COSE), circus/traveling exhibits, and artificially propagated plants, can only be re-issued, renewed, or amended by submitting a new application for permits for those activities. Please refer to http://www.fws.gov/international/permits/by-form-number/index.html to determine if another application form would be more appropriate or contact the Division of Management Authority for more information.

1. **Permit number.** Enter the permit number to be reissued/renewed/amend MA04322C-0

2. Submit the original permit with this application.

3. **Past activities.**
   a. Provide copies of all cleared documents and form 3-177 (FWS declaration of wildlife) associated with this permit.
   b. Provide a summary detailing activities conducted under this permit, as well as a brief statement of why you are seeking reissuance/renewal.

4. **Annual Report.** If required by your permit, provide an annual report as conditioned (Please disregard if you have already submitted your annual report.)

5. **Sport-hunted trophies:** If you did not hunt during the hunting season stated in your original application, you are not eligible for a renewal. Please submit a new application form.

6. **Certification** - Complete one of the statements below and supply any additional documentation requested: (original signature is required)

   a. For **NO CHANGES** to original application:

   I certify that the information submitted in support of my original application for the permit indicated above has not changed and is still currently correct. I hereby request reissuance or renewal of this permit.

   Permittee's signature: _____ Date: 10-10-2017

   b. For **CHANGES** to original application:

   On an attached page(s), provide a complete description of any changes (e.g., change in principal officer, personnel, address, location of activities, types of activities). Please sign each attached page. Also note that we need to request additional information regarding the changes after reviewing your initial request.

   I certify that the information submitted in support of my original application for the permit indicated above is still currently correct EXCEPT for the changes noted on the attached, signed page(s). I hereby request re-issuance or renewal of this permit with the indicated changes.

   Permittee's signature: _____ Date: _____

7. All international shipment(s) must be through a designated port, unless otherwise authorized. A list of designated ports (where an inspector is posted) is available from http://www.fws.gov/le/designated-ports.html. If you wish to use a port not listed, please contact either the Office of Law Enforcement for a Designated Port Exemption Permit (form 3-200-2) or the Division of Management Authority.

8. Name and address where you wish the permit to be mailed, if different from page 1 (All permits will be mailed via the U.S. Postal Service, unless you identify an alternative means below):

9. If you wish the permit to be delivered by means other than USPS regular mail, provide an air bill, pre-paid envelope, or billing information. If you do not have a pre-paid envelope or air bill and wish to pay for a courier service with your credit card, please check the box below. Please DO NOT include credit card number or other information; you will be contacted for this information.

   ☐ If a permit is issued, please send it via a courier service to the address on page 1 or question 8. I understand that you will contact me for my credit card information once the application has been processed.

11. Who should we contact if we have questions about the application? (Include name, phone number, and email):

Dean Yasharian
(b) (6) [redacted]

12. **Disqualification Factor.** A conviction, or entry of a plea of guilty or nolo contendere, for a felony violation of the Lacey Act, the Migratory Bird Treaty Act, or the Bald and Golden Eagle Protection Act disqualifies any such person from receiving or exercising the privileges of a permit, unless such disqualification has been expressly waived by the Service Director in response to a written petition. [50 CFR 13.21(c)]. Have you or any of the owners of the business, if applying as a business, been convicted, or entered a plea of guilty or nolo contendere, forfeited collateral, or are currently under charges for any violations of the laws mentioned above?

☐ Yes ☒ No If you answered "Yes" provide: a) the individual's name, b) date of charge, c) charge(s), d) location of incident, e) court, and f) action taken for each violation.

OCT 17 2017

VERIFY THE AUTHENTICITY OF THIS MULTI-TONE SECURITY DOCUMENT. CHECK BACKGROUND AREA CHANGES COLOR GRADUALLY FROM TOP TO BOTTOM.

MONEY ORDER

(b) (6) [redacted]

82-20
311

074 - Dansville
Dansville, New York

Date 10/10/2017

Pay To The Order Of U.S. Fish and Wildlife Service $ 100.00 ***

Pay ONE HUNDRED DOLLARS AND 00 CENTS

Dean Yacobucci
SENDER

(b) (6) [redacted] Aurora, NY (b) (6) [redacted]
ADDRESS

NOT VALID FOR MORE THAN $2500.00

MEMO permit MA043222C-0

Issued by: Citibank N.A. One Penn's Way, New Castle, DE 19720
For information about this instrument, call: 1-888-556-5142

(b) (6) [redacted]

ELEPHANT IMPORT FROM NAMIBIA

Permit Number: MA04322C-1

Effective: 12/15/2017 Expires: 12/14/2018

Issuing Office:

Department of the Interior
U.S. FISH AND WILDLIFE SERVICE
DIVISION OF MANAGEMENT AUTHORITY
BRANCH OF PERMITS, MS: IA
5275 LEESBURG PIKE
FALLS CHURCH VA 22041-3803

Mary Coghlan
FOR
CHIEF, BRANCH OF PERMITS, DMA

Permittee:

DEAN (b) (6) YACOBUCCI
(b) (6)
EAST AURORA, NY (b) (6)
U.S.A.

Authority: Statutes and Regulations: 16 USC 1539 (a); 50 CFR 17.40 (e).

Location where authorized activity may be conducted:
IMPORT THROUGH ANY PORT LISTED IN 50 CFR 14.12

Reporting requirements: Not applicable

Authorizations and Conditions:

A. General conditions set out in Subpart D of 50 CFR 13, and specific conditions contained in Federal regulations cited above, are hereby made a part of this permit. All activities authorized herein must be carried out in accord with and for the purposes described in the application submitted. Continued validity, or renewal of this permit is subject to complete and timely compliance with all applicable conditions, including the filing of all required information and reports.

B. The validity of this permit is also conditioned upon strict observance of all applicable foreign, state, local, tribal, or other federal law.

C. Valid for use by permittee named above.

D. Acceptance of this permit serves as evidence that the permittee understands and agrees to abide by the "General Permit Conditions" (copy attached).

E. Authorized to import the sport-hunted trophy of one African elephant (*Loxodonta africana*), taken in Namibia for the purpose of enhancement of the survival of the species.

F. Specimen may not be sold or transferred for any financial remuneration.

G. U.S. Threatened Species: tusks must be marked as per [50 CFR 17.40(e)]. In accordance with the African Elephant Conservation Act, raw ivory, including sport-hunted trophies that are wholly or partially ivory, may not be re-exported from the U.S.

H. **Trophy must have been taken during the 2015 hunting season.**

I. Trophy must be accompanied by a valid Convention on International Trade in Endangered Species (CITES) Appendix II export permit issued by the Management Authority of Namibia.

Department of the Interior
U.S. Fish and Wildlife Service

OMB No. 1018-0093
Expires 05/31/2017

Federal Fish and Wildlife Permit Application Form

RCVD SEP 06 2017

Return to: U.S. Fish and Wildlife Service
(Enter address from pages 5 and 6 of application)

Type of Activity:
REISSUANCE, RENEWAL, OR AMENDMENT OF A PERMIT
(For this application, all permits, registrations, and certificates are referred to as a permit.)

Complete Sections A or B, C, D, and E of this application. U.S. address may be required in Section C, see instructions for details.
See attached instruction pages for information on how to make your application complete and help avoid unnecessary delays.

A. Complete if applying as an individual

1.a. Last name	1.b. First name	1.c. Middle name/ initial	1.d. Suffix
DAVIS	TODD	(b) (6)	

2. Date of birth (mm/dd/yyyy)	3. Social Security No.	4. Occupation	5. Affiliation/ Doing business as (see instructions)
(b) (6)			

6.a. Telephone number	6.b. Alternate telephone number	6.c. Fax number	6.d. E-mail address
(b) (6)		(b) (6)	

B. Complete if applying on behalf of a business, corporation, public agency, Tribe, or institution

1.a. Name of business, agency, Tribe, or institution	1.b. Doing business as (dba)

2. Tax identification no.	3. Description of business, agency, Tribe, or institution

4.a. Principal officer Last name	4.b. Principal officer First name	4.c. Principal officer Middle name/ initial	4.d. Suffix

5. Principal officer title	6. Primary contact name

7.a. Business telephone number	7.b. Alternate telephone number	7.c. Business fax number	7.d. Business e-mail address

C. All applicants complete address information

1.a. Physical address (Street address; Apartment #, Suite #, or Room #; no P.O. Boxes)
(b) (6)

1.b. City	1.c. State	1.d. Zip code/Postal code:	1.e. County/Province	1.f. Country
Smithfield	UTAH	(b) (6)		USA

2.a. Mailing Address (include if different than physical address; include name of

2.b. City	2.c. State	2.d. Zip code/Postal code:	2.e. County/Province	2.f. Country

D. All applicants MUST complete

1. Attach check or money order payable to the U.S. FISH AND WILDLIFE SERVICE **in the amount indicated on pages 6 and 7.** Federal, Tribal, State, and local government agencies, and those acting on behalf of such agencies, are exempt from the processing fee – ***attach documentation of fee exempt status as outlined in instructions.*** (50 CFR 13.11(d))

2. Do you currently have or have you ever had any Federal Fish and Wildlife permits?
Yes ☒ If yes, list the number of the most current permit you have held or that you are applying to renew/re-issue: MA043276-0 No ☐

3. Certification: I hereby certify that I have read and am familiar with the regulations contained in ***Title 50, Part 13 of the Code of Federal Regulations*** and the other ***applicable parts in subchapter B of Chapter I of Title 50,*** and I certify that the information submitted in this application for a permit is complete and accurate to the best of my knowledge and (b) (6) that any false statement herein may subject me to the criminal penalties of 18 U.S.C. 1001.

Signature (**in blue ink**) of applicant/person responsible for permit (No photocopied or stamped signatures) — Date of signature (mm/dd/yyyy): 8-31-17

E. REISSUANCE, RENEWAL, OR AMENDMENT OF A PERMIT (For this application, all permits, registrations, and certificates are referred to as a permit.)

NOTE 1: If you are renewing your Designated Port Exemption permit, use form 3-200-2 (http://www.fws.gov/forms/3-200-2.pdf) and submit to appropriate Office of Law Enforcement address. If you are renewing your Import/Export license (required for commercial activities), use form 3-200-3 (http://www.fws.gov/forms/3-200-3.pdf) and submit to appropriate Office of Law Enforcement address.

NOTE 2: This form **cannot** be used for lost or damaged permit. If you need to replace a lost or damaged permit, please use form 3-200-66, http://www.fws.gov/international/pdf/permit-application-form-3-200-66-replacement-document.pdf. The application **must** be submitted to the office that issued the initial permit. Lost or damaged permit

NOTE 3: Some activities, such as all master files for multiple shipments, Certificate of Scientific Exchange (COSE), circus/traveling exhibits, and artificially propagated plants, can only be re-issued, renewed, or amended by submitting a new application for permits for those activities. Please refer to http://www.fws.gov/international/permits/by-form-number/index.html to determine if another application form would be more appropriate or contact the Division of Management Authority for more information.

1. **Permit number.** Enter the permit number to be reissued/renewed/amend MA043276-0

2. Submit the original permit with this application.

3. **Past activities.**
   a. Provide copies of all cleared documents and form 3-177 (FWS declaration of wildlife) associated with this permit.
   b. Provide a summary detailing activities conducted under this permit, as well as a brief statement of why you are seeking reissuance/renewal.

4. **Annual Report.** If required by your permit, provide an annual report as conditioned (Please disregard if you have already submitted your annual report.)

5. **Sport-hunted trophies:** If you did not hunt during the hunting season stated in your original application, you are not eligible for a renewal. Please submit a new application form.

6. **Certification** - Complete one of the statements below and supply any additional documentation requested: (original signature is required)

   a. For **NO CHANGES** to original application:

   I certify that the information submitted in support of my original application for the permit indicated above has not changed and is still currently correct. I hereby request reissuance or renewal of this permit.

   Permittee's signature: _____ (b) (6) _____ Date: 8-31-17

   b. For **CHANGES** to original application:

   On an attached page(s), provide a complete description of any changes (e.g., change in principal officer, personnel, address, location of activities, types of activities). Please sign each attached page. Also note that we need to request additional information regarding the changes after reviewing your initial request.

   I certify that the information submitted in support of my original application for the permit indicated above is still currently correct EXCEPT for the changes noted on the attached, signed page(s). I hereby request re-issuance or renewal of this permit with the indicated changes.

   Permittee's signature: _____ Date: _____

7. All international shipment(s) must be through a designated port, unless otherwise authorized. A list of designated ports (where an inspector is posted) is available from http://www.fws.gov/le/designated-ports.html. If you wish to use a port not listed, please contact either the Office of Law Enforcement for a Designated Port Exemption Permit (form 3-200-2) or the Division of Management Authority.

8. Name and address where you wish the permit to be mailed, if different from page 1 (All permits will be mailed via the U.S. Postal Service, unless you identify an alternative means below):

9. If you wish the permit to be delivered by means other than USPS regular mail, provide an air bill, pre-paid envelope, or billing information. If you do not have a pre-paid envelope or air bill and wish to pay for a courier service with your credit card, please check the box below. Please DO NOT include credit card number or other information; you will be contacted for this information.

   ☒ If a permit is issued, please send it via a courier service to the address on page 1 or question 8. I understand that you will contact me for my credit card information once the application has been processed.

11. Who should we contact if we have questions about the application? (Include name, phone number, and email):

12. **Disqualification Factor.** A conviction, or entry of a plea of guilty or nolo contendere, for a felony violation of the Lacey Act, the Migratory Bird Treaty Act, or the Bald and Golden Eagle Protection Act disqualifies any such person from receiving or exercising the privileges of a permit, unless such disqualification has been expressly waived by the Service Director in response to a written petition. [50 CFR 13.21(c)]. Have you or any of the owners of the business, if applying as a business, been convicted, or entered a plea of guilty or nolo contendere, forfeited collateral, or are currently under charges for any violations of the laws mentioned above?

☐ Yes ☒ No If you answered "Yes" provide: a) the individual's name, b) date of charge, c) charge(s), d) location of incident, e) court, and f) action taken for each violation.

DEPARTMENT OF THE INTERIOR
U.S. FISH AND WILDLIFE SERVICE
DIVISION OF MANAGEMENT AUTHORITY
BRANCH OF PERMITS, MS: IA
5275 LEESBURG PIKE
FALLS CHURCH VA 22041-3803

FEDERAL FISH AND WILDLIFE PERMIT

1 PERMITTEE
TODD (b) (6) DAVIS
(b) (6)
SMITHFIELD, UT (b) (6)
U.S.A.

2 AUTHORITY STATUTES
16 USC 1539 (a)

REGULATIONS
50 CFR 17.40 (e)

Original, Unused Permit Returned

3 NUMBER
MA04327C-0

4 RENEWABLE
☒ YES
☐ NO

5 MAY COPY
☐ YES
☒ NO

6 EFFECTIVE
09/06/2016

7 EXPIRES
09/05/2017

8 NAME AND TITLE OF PRINCIPAL OFFICER *(If #1 is a business)*

9 TYPE OF PERMIT
ELEPHANT IMPORT FROM NAMIBIA

10 LOCATION WHERE AUTHORIZED ACTIVITY MAY BE CONDUCTED
IMPORT THROUGH ANY PORT LISTED IN 50 CFR 14.12

11 CONDITIONS AND AUTHORIZATIONS

A GENERAL CONDITIONS SET OUT IN SUBPART D OF 50 CFR 13, AND SPECIFIC CONDITIONS CONTAINED IN FEDERAL REGULATIONS CITED IN BLOCK #2 ABOVE, ARE HEREBY MADE A PART OF THIS PERMIT. ALL ACTIVITIES AUTHORIZED HEREIN MUST BE CARRIED OUT IN ACCORD WITH AND FOR THE PURPOSES DESCRIBED IN THE APPLICATION SUBMITTED. CONTINUED VALIDITY, OR RENEWAL, OF THIS PERMIT IS SUBJECT TO COMPLETE AND TIMELY COMPLIANCE WITH ALL APPLICABLE CONDITIONS, INCLUDING THE FILING OF ALL REQUIRED INFORMATION AND REPORTS

B THE VALIDITY OF THIS PERMIT IS ALSO CONDITIONED UPON STRICT OBSERVANCE OF ALL APPLICABLE FOREIGN, STATE, LOCAL, TRIBAL, OR OTHER FEDERAL LAW.

C VALID FOR USE BY PERMITTEE NAMED ABOVE.

D. Acceptance of this permit serves as evidence that the permittee understands and agrees to abide by the "General Permit Conditions" (copy attached).

E. Authorized to import the sport-hunted trophy of one African elephant (*Loxodonta africana*), taken in Namibia for the purpose of enhancement of the survival of the species.

F. Specimen may not be sold or transferred for any financial remuneration.

G. U.S. Threatened Species: tusks must be marked as per [50 CFR 17.40(e)]. In accordance with the African Elephant Conservation Act, raw ivory, including sport-hunted trophies that are wholly or partially ivory, may not be re-exported from the U.S.

H. **Trophy must have been taken during the 2016 hunting season.**

I. Trophy must be accompanied by a valid Convention on International Trade in Endangered Species (CITES) Appendix II export issued by the Management Authority of Namibia.

☒ ADDITIONAL CONDITIONS AND AUTHORIZATIONS ALSO APPLY

12. REPORTING REQUIREMENTS

ISSUED BY	TITLE	DATE
	CHIEF, BRANCH OF PERMITS, DMA	09/06/2016

(6) (6)
97-232/1243
(6) (6)
DATE 8-31-17
PAY TO THE ORDER OF US Fish + Wildlife
Che Hunt & NO/180
$ 100 00
DOLLARS
Heat Reactive Ink
Cache Valley Bank
121 NORTH MAIN
LOGAN, UTAH 84321
(435) 753-3000
1710 NORTH MAIN
NORTH LOGAN, UTAH 84341
(435) 753-8736
55 plus
MEMO
Permit Renewal
(6) (6)
(6) (6)
(6) (6)
LOOK FOR FRAUD-DETERR
SECURITY SQUARE AND HEAT-REACTIVE INK. DETAILS ON BACK.

ELEPHANT IMPORT FROM NAMIBIA

Permit Number: MA04327C-1

Effective: 09/21/2017 Expires: 09/20/2018

Issuing Office:

Department of the Interior
U.S. FISH AND WILDLIFE SERVICE
DIVISION OF MANAGEMENT AUTHORITY
BRANCH OF PERMITS, MS: IA
5275 LEESBURG PIKE
FALLS CHURCH VA 22041-3803

CHIEF, BRANCH OF PERMITS, DMA

Permittee:

TODD (b) (6) DAVIS
(b) (6)
SMITHFIELD, UT (b) (6)
U.S.A.

Authority: Statutes and Regulations: 16 USC 1539 (a); 50 CFR 17.40 (e).

Location where authorized activity may be conducted:
IMPORT THROUGH ANY PORT LISTED IN 50 CFR 14.12

Reporting requirements: Not applicable

Authorizations and Conditions:

A. Authorized to import the sport-hunted trophy of one African elephant (*Loxodonta africana*), taken in Namibia for the purpose of enhancement of the survival of the species.

B. Specimen may not be sold or transferred for any financial remuneration.

C. U.S. Threatened Species: tusks must be marked as per [50 CFR 17.40(e)]. In accordance with the African Elephant Conservation Act, raw ivory, including sport-hunted trophies that are wholly or partially ivory, may not be re-exported from the U.S.

D. Trophy must have been taken during the 2018 hunting season.

E. Trophy must be accompanied by a valid Convention on International Trade in Endangered Species (CITES) Appendix II export permit issued by the Management Authority of Namibia.

F. General conditions set out in Subpart D of 50 CFR 13, and specific conditions contained in Federal regulations cited above, are hereby made a part of this permit. All activities authorized herein must be carried out in accord with and for the purposes described in the application submitted. Continued validity, or renewal of this permit is subject to complete and timely compliance with all applicable conditions, including the filing of all required information and reports.

G. The validity of this permit is also conditioned upon strict observance of all applicable foreign, state, local, tribal, or other federal law. This permit can be photocopied.

H. Valid for use by permittee named above.

I. Acceptance of this permit serves as evidence that the permittee understands and agrees to abide by the "General Permit Conditions" (copy attached).

CONSERVATION FORCE
A Force For Wildlife Conservation

† Baron Bertrand des Clers, Ph.D.
† James G. Teer, Ph.D.
† Bart O'Gara, Ph.D.
† Don Lindsay

BOARD OF DIRECTORS:

John J. Jackson, III, J.D.
Chrissie Jackson
Philippe Chardonnet, D.V.M.
Bert Klineburger
Shane Mahoney
Dale Towell, Ph.D.

July 29, 2016

RCVD AUG 22 2016 LB

U.S. Fish and Wildlife Service
Division of Management Authority (DMA)
Branch of Permits, MS: IA
5275 Leesburg Pike
Falls Church, VA 22041

Re: Two Applications for Import of Elephant Trophies from Zimbabwe:

Dear Chief Van Norman,

Enclosed please find two permit applications for harvested African elephant trophies from Zimbabwe:

- Richard (b) (6) Bonander
- Thomas (b) (6) Whaley

Please refer to the numerous documents and responses previously sent to the U.S. Fish and Wildlife Service by the Zimbabwe Parks and Wildlife Management Authority, Conservation Force, professional hunters and operators, professional hunting organizations, and the CAMPFIRE Association, which demonstrates that Zimbabwe's elephant hunting program is well managed and the hunting enhances the survival of the species.

Sincerely,

John J. Jackson, III

3240 S I-10 Service Rd. W. Suite 200, Metairie, Louisiana 70001-6911, USA
Telephone: (504) 837-1233 • Fax (504) 837-1145 • E-mail: jjj@conservationforce.org
www.conservationforce.org

NOTICE OF REPRESENTATION

RCVD AUG 22 2016

This is a notice to the U.S. Fish and Wildlife Service that I have appointed John J. Jackson, III and Regina Lennox of the non-profit firm Conservation Force as my attorneys and legal representatives for all matters concerning my application for a permit to import a threatened-listed African elephant trophy.

This authority is inclusive and extends to all applications and filings, whether administrative or judicial, including but not limited to any request for reconsideration, appeal, and litigation.

I also request that these attorneys, through the address for Conservation Force below, be copied with all correspondence, acknowledgements, notices and decisions concerning my application to import my ~~lion~~ Elephant trophy at the following address:

John J. Jackson, III
Regina Lennox
Conservation Force
3240 S. I-10 Service Road W., Suite 200
Metairie, Louisiana 70001 USA
T: (504) 837-1233
F: (504) 837-1145
E: jjw-no2@att.net
E: regina.lennox@conservationforce.org

Signed: [redacted (b)(6)]

Name: Richard [redacted (b)(6)] Bonander

Date: July 15, 2016

Department of the Interior
U.S. Fish and Wildlife Service

OMB No. 1018-0164
Expires 11/30/2016

Federal Fish and Wildlife Permit Application Form

RCVD AUG 22 2016

LB

Return to: U.S. Fish and Wildlife Service
Division of Management Authority (DMA)
Branch of Permits, MS: IA
5275 Leesburg Pike
Falls Church, VA 22041-3803
1-800-358-2104 or 703-358-2104

Type of Activity:
Import of Sport-hunted Trophies of Southern African Leopard, African Elephant, and Namibian Southern White Rhinoceros

Complete Sections A or B, and C, D, and E of this application. U.S. address may be required in Section C, see instructions for details.
See attached instruction pages for information on how to make your application complete and help avoid unnecessary delays.

A. Complete if applying as an individual

1.a. Last name	1.b. First name	1.c. Middle name or initial	1.d. Suffix
Bonander	Richard	(b) (6)	

2. Date of birth (mm/dd/yyyy)	3. Occupation	4. Affiliation/ Doing business as (see instructions)
(b) (6)		

5.a. Telephone number	5.b. Alternate telephone number	5.c. Fax number	5.d. E-mail address
(b) (6)			

B. Complete if applying on behalf of a business, corporation, public agency, Tribe, or institution

1.a. Name of business, agency, Tribe, or institution	1.b. Doing business as (dba)

2. Tax identification no.	3. Description of business, agency, Tribe, or institution

4.a. Principal officer Last name	4.b. Principal officer First name	4.c. Principal officer Middle name/ initial	4.d. Suffix

5. Principal officer title	6. Primary contact name

7.a. Business telephone number	7.b. Alternate telephone number	7.c. Business fax number	7.d. Business e-mail address

C. All applicants complete address information

1.a. Physical address (Street address; Apartment #, Suite #, or Room #; no P.O. Boxes)
(b) (6)

1.b. City	1.c. State	1.d. Zip code/Postal code:	1.e. County/Province	1.f. Country
Casper	Wyoming	(b) (6)		USA

2.a. Mailing Address (include if different than physical address; include name of contact person if applicable)

2.b. City	2.c. State	2.d. Zip code/Postal code:	2.e. County/Province	2.f. Country

D. All applicants MUST complete

1. Attach check or money order payable to the U.S. FISH AND WILDLIFE SERVICE **in the amount of $100, nonrefundable processing fee**. Federal, Tribal, State, and local government agencies, and those acting on behalf of such agencies, are exempt from the processing fee – ***attach documentation of fee exempt status as outlined in instructions.*** (50 CFR 13.11(d))

2. Do you currently have or have you ever had any Federal Fish and Wildlife permits?
Yes ☑ If yes, list the number of the most current permit you have held or that you are applying to renew/re-issue: MA66124B-0 No ☐

3. Certification: I hereby certify that I have read and am familiar with the regulations contained in ***Title 50, Part 13 of the Code of Federal Regulations*** and the other ***applicable parts in subchapter B of Chapter I of Title 50***, and I certify that the information submitted in this application for a permit is complete and accurate to the best of my knowledge and belief. I understand that any false statement herein may subject me to the criminal penalties of 18 U.S.C. 1001.

Richard Bonander — 07/18/2016

Signature of applicant/person responsible for permit (No photocopied or stamped signatures) — Date of signature (mm/dd/yyyy)

Please continue to next page

E. IMPORT OF SPORT-HUNTED TROPHIES OF SOUTHERN AFRICAN LEOPARD, AFRICAN ELEPHANT, AND NAMIBIAN SOUTHERN WHITE RHINOCEROS

Note 1: If you hold an import permit for a trophy/trophies that you did not use, please **return the unused original permit.** If you are requesting reissuance of a permit because you have taken a trophy, but were unable to import it prior to the expiration of the permit, please use the renewal form (3-200-52; http://www.fws.gov/international/permits/by-form-number/index.html) and return your original permit with that form.

Note 2: *Sport-hunted trophy* is defined at 50 CFR 23.74 as follows: *Sport-hunted trophy* means a whole dead animal or a readily recognizable part or derivative of an animal specifically identified on the accompanying CITES document that meets the following criteria:

(1) Is raw, processed, or manufactured;
(2) Was legally obtained by the hunter through hunting for his or her personal use;
(3) Is being imported, exported, or re-exported by or on behalf of the hunter as part of the transfer from its country of origin ultimately to the hunter's country of usual residence; and
(4) Includes worked, manufactured, or handicraft items made from the sport-hunted animal only when:
(i) Such items are contained in the same shipment as raw or tanned parts of the sport-hunted animal and are for the personal use of the hunter;
(ii) The quantity of such items is no more than could reasonably be expected given the number of animals taken by the hunter as shown on the license or other documentation of the authorized hunt accompanying the shipment; and
(iii) The accompanying CITES documents (export document and, if appropriate, import permit) contain a complete itemization and description of all items included in the shipment.

Note 3: Certain hunting trophies, including leopard, elephant, and rhinoceros hunting trophies, are subject to restrictions on their use after import into the United States. Please see 50 CFR 23.55 for more information or contact the Division of Management Authority.

Please provide the following information. Complete all questions on the application. Mark questions that are not applicable with "N/A". If applying for more than one trophy, be sure to answer questions 2 and 3 for each trophy.

If importing trophies from more than one country, you must submit a separate application for each shipment in order to obtain separate import permits.

1. ENTER the quantity next to the name of the species you are applying to import (you may apply to import specimens of more than one species provided they have been/are being hunted in the same country):

Leopard (*Panthera pardus*) Quantity:_____(Import is limited to two per hunter per calendar year)

African elephant (*Loxodonta africana*) Quantity:__1__(Import is limited to two per hunter per calendar year)
Note: once imported, ivory cannot be re-exported.

Southern white rhinoceros (*Ceratotherium simum simum*) from Namibia Quantity:_____ (An import permit is not required for trophies harvested in South Africa or Swaziland. If you wish to import from a different country, please use form 3-200-37).

2. **IF ANIMAL IS CURRENTLY LIVING IN THE WILD,** please enter the following:
   a. Country and place (area, region, GIS coordinates, ranch AND nearest city) where wildlife is to be taken from the wild:

   b. Date wildlife is to be hunted:

c. Description of the trophy and parts you intend to import (e.g., skin, skull, shoulder mount, life size mount, claws, horns, tusks).

3. **IF THE ANIMAL IS DEAD**, please enter the following:
   a. Country and place (area, region, GIS coordinates, ranch, and/or AND nearest city) where trophy was removed from the wild: Zimbabwe, Ngamo/Sikumi Forest Block Matabeleland N Grid Reference 246130, Wanke, Zimbabwe (Hwange)
   b. Date wildlife was hunted: March 21, 2015
   c. Description of the trophy and parts you intend to import (e.g., skin, skull, shoulder mount, life size mount, claws, horn, tusks):

      Skin, tusks, skull and 2 leg bones

   d. The current location of the trophy (address and country) [the U.S. import permit will identify this country as the country of export/re-export and must match with the export/re-export document]:

      Trophy Consultants International, No. 4 Josiah Chinamana Road, Belmont, Bulawayo, Zimbabwe

4. Complete name and address of overseas person or business shipping the trophy to you. If you are applying to import a trophy directly from Namibia, you **must** provide the name and address of the professional hunter listed on your Namibian hunting permit [this name will appear on the face of the export permit].

Name: Business	Trophy Consultants International
Name: Address:	No. 4 Josiah Chinamano Road
Address:	Belmont
City:	Bulawayo
State/Province:	
Country, Postal Code:	Zimbabwe

phone # 263-9-74356

5. Please be aware that the U.S. Fish and Wildlife Service may need to make a finding that your activities will enhance or benefit wild populations of the species involved. If you have any information that could support this finding (e.g., how the funds from license/trophy fees will be spent, what portion of the hunting fee will support conservation), please submit such information on a separate page with your application.

Please see information submitted by Conservation Force, range state authorities, safari hunting operators, and others.

CERTIFICATION STATEMENT (original signature must be provided for either 6 or 7 below)

6. **If you are a broker or taxidermist applying on behalf of a foreign national,** provide documentation to show you have a **Power of Attorney** to act on your client's behalf and sign the following statement.

   I acknowledge that the sport-hunted trophy/trophies to be imported has been/will be personally hunted by my client and is being imported only for my client's personal use (i.e., **not for sale, transfer, donation, or exchange that is reasonably likely to result in economic use, gain, or benefit**). I understand that my client may only import two leopard trophies in one calendar year. I understand that my client may only import two African elephant trophies in one calendar year. In addition, I have advised my client that raw ivory, once imported into the United States, cannot be re-exported.

   Taxidermist/Broker's signature:_____ Date: _____

If you are the hunter applying to import your own trophy, please read and sign the following statement.

I acknowledge that the sport-hunted trophy/trophies to be imported has been/will be personally hunted by me and is being imported only for my personal use (i.e., **not for sale, transfer, donation, or exchange that is reasonably likely to result in economic use, gain, or benefit**). I understand that I may only import two leopard trophies in one calendar year. I understand that I may only import two African elephant trophies in one calendar year. In addition, I understand that raw ivory, once imported into the United States, cannot be re-exported.

Applicant's signature: _____ Date: July 18, 2016

Be aware that there may be additional permitting or approval requirements by your local or state governments, as well as required by other Federal agencies or foreign government to conduct your proposed activity. While the Service will attempt to assist where possible, it is your responsibility to obtain such approval.

8. All international shipment(s) must be through a designated port. A list of designated ports (where an inspector is posted) is available from http://www.fws.gov/le/designated-ports.html. If you wish to use a port not listed, please contact the Office of Law Enforcement for a Designated Port Exemption Permit (form 3-200-2).

   Portland, OR

9. Name and address where you wish the permit to be mailed, **if different from page 1** (All permits will be mailed via the U.S. Postal Service, unless you identify an alternative means below):

10. If you wish the permit to be delivered by means other than USPS regular mail, provide an air bill, pre-paid envelope, or billing information. If you do not have a pre-paid envelope or air bill and wish to pay for a courier service with your credit card, please check the box below. Please DO NOT include credit card number or other information; you will be contacted for this information.

    ☐ If a permit is issued, please send it via a courier service to the address on page 1 or question 9. I understand that you will contact me for my credit card information once the application has been processed.

11. Who should we contact if we have questions about the application? (Include name, phone number, and email):

    Applicant or John J. Jackson, III or Regina Lennox of Conservation Force, 504-837-1233, cf@conservationforce.org

12. **Disqualification Factor.** A conviction, or entry of a plea of guilty or nolo contendere, for a felony violation of the Lacey Act, the Migratory Bird Treaty Act, or the Bald and Golden Eagle Protection Act disqualifies any such person from receiving or exercising the privileges of a permit, unless such disqualification has been expressly waived by the Service Director in response to a written petition. (50 CFR 13.21(c)) Have you or any of the owners of the business, if applying as a business, been convicted, or entered a plea of guilty or nolo contendere, forfeited collateral, or are currently under charges for any violations of the laws mentioned above?

    ☐ Yes ☑ No If you answered "Yes" provide: a) the individual's name, b) date of charge, c) charge(s), d) location of incident, e) court, and f) action taken for each violation.

Ngamo Safaris
P. O. Box 467
Bulawayo
Zimbabwe
Tel/Fax: 263-9-76009, 76053

9 March 2015

TO WHOM IT MAY CONCERN

INVITATION TO HUNT IN THE NGAMO / SIKUMI FORESTRY HUNTING CONCESSION , ZIMBABWE

We would like to extend an invitation to :

Mr Richard (b) (6) Bonander , who resides at Address: (b) (6) , Casper, WY (b) (6) USA

American Passport, number : (b) (6) Expires 20/12/20. Issued in Montana USA.

Date of birth: (b) (6)

Details for Bonander Safari -

Arrive 20/3/15
Hunt 21/3/15 to 4/4/15
Depart 5/4/15

He will join Ngamo Safaris, on a hunt in the Ngamo/Sikumi Hunting Concession Area, Zimbabwe. This hunt will commence on 21 March to 4 April. Mr Bonander will be accompanied on his hunt by one of the Company's Professional Hunters who are licensed by the Zimbabwe National Parks Authority to conduct Trophy Hunts.

He will be hunting game using the following Firearm :

Dakota 76 AFR .416 Rigby and Swarovski scope

He will be issued with a Visitors Permit to Possess Firearms and Ammunition at Customs and Immigration on arrival in Zimbabwe. The rifle will be used for hunting purposes only.

He will be flying on South African Airways into Victoria Falls Airport 20/3/15.

Yours sincerely,

R Cooke
FOR AND ON BEHALF OF NGAMO SAFARIS

3. DETAILS OF DEPOSITS

(All inclusive of Daily Rate, Trophy Fees, Processing, Handling charges and any other incidentals)

(I) Safari Operator

	Value Date	ECA Number	ECA Date	Currency	Invoice Amount	Amount Paid
1	31-OCT-2014	SEP/169	07-JAN-2016	USD	44,444.25	40,685.96
2						
3						
4						

(II) Taxidermist

	Value Date	ECA Number	ECA Date	Currency	Invoice Amount	Amount Paid
1						
2						
3						
4						

4. FINANCIAL DATA

Total Daily rate	23,700.00	Total Guests rate	1,380.00
Less Commission	3,758.30	Total Trophy fees	18,055.00
Other fees (Incidentals)	1,309.25	Grand Total USD	40,685.96
Percentage Commission Charged	8.46	Total Processing Fees	

5. DETAILS OF SPECIES HUNTED

	SPECIES	SEX	WK	CONCESSION/FARM	GRID REF	DATE SHOT	SCI TROPHY SIZE	TROPHY FEES
1	FRANCOLIN	N	Killed	Ngamo/Sikumi	561028	02-APR-2015	n/a	20
2	ELEPHANT - WITH TUSKS	M	Killed	Ngamo/Sikumi	246130	21-MAR-2015	123.2"	14,500
3	GUINEA FOWL	N	Killed	Ngamo/Sikumi	522042	23-MAR-2015	n/a	35
4	SABLE ANTELOPE	M	Killed	Ngamo/Sikumi	521032	24-MAR-2015	97"	3,500
5								
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HUNTING RETURN FORM - TRAS2
APPLICATION FOR HUNTING NP/CITES

Issued in terms of Exchange Control Act (Chapter 22:05),
The Parks and Wild Life Act (Chapter 20:14) and the Tourism Act (Chapter 14:20)

0000075359
HUNT_FUNDS_CAPTURED

1. DETAILS OF THE SAFARI OPERATOR

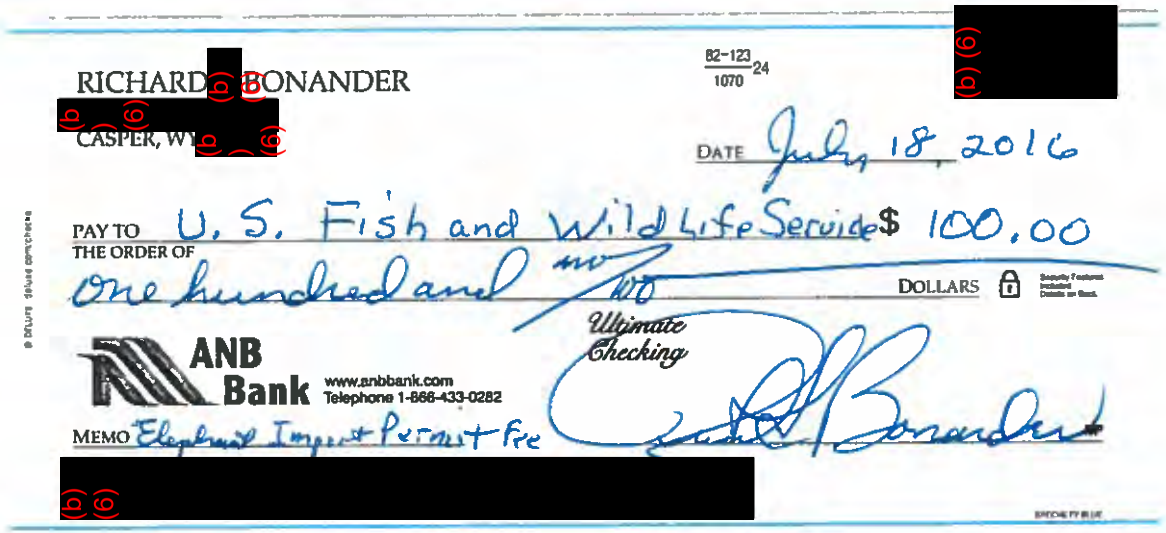
Name of Operator	Forestry Commision t/a Ngamo Safaris	Client's Full Name	Richard (b) Bonander
ZTA (HOP) No.	HOP0134	Passport Number	(b) (6)
		Country of Issue	UNITED STATES
Address	71 FIFE STREET P.O. BOX 467 BULAWAYO	Address	(b) (6) Casper, WY (b) (6)
Name of Professional Hunter	RICHARD COOKE	Licence No.	77
Telephone		Fax	0
Number of Accompanying Guests			0
Are the trophies being exported after tanning and mounting?			
Are the trophies being exported after primary treatment?			
Name of Processing Agent or Taxidermist	TROPHY CONSULTANTS INTERNATIONAL	Address	4 JOSIAH CHINAMANO RD BELMONT BULAWAYO
Name of Shipping Agent	Maple freight	Address	4th Josiah Chinamano Road Belmont Bulawayo Zimbabwe
Name of Foreign Agent		Address	

2. HUNTING AREAS

	Hunting Area Name	Province	Signature of Land Authority
1	Ngamo/Sikumi	Matabeleland North	
2			
3			
4			
5			
6			
7			
8			
9			
10			
11			
12			
13			
14			
15			

Date of Safari From	21-03-2015
Date of Safari To	04-04-2015
Daily Rate Charged For Big Game USD	1,420.00
Daily Rate Charged For Plains Game USD	.00
Daily Rate Charged for Non hunting guests USD	.00
Number of Accompanying Guests	0

ZPWMA
Date Stamp



RICHARD [redacted] BONANDER
[redacted]
CASPER, WY [redacted]

82-123
1070
24

[redacted]

DATE July 18, 2016

PAY TO THE ORDER OF U. S. Fish and Wild Life Service $ 100.00

one hundred and no/100 DOLLARS

ANB Bank
www.anbbank.com
Telephone 1-866-433-0282

Ultimate Checking

MEMO Elephant Import Permit Fee

[redacted]

RCVD AUG 22 2016

United States Department of the Interior

FISH AND WILDLIFE SERVICE
Washington, D.C. 20240

FEB 2 3 2017

In Reply Refer To:
FWS/AIA/DMA/PRT– 04846C

Mr. Richard (b) Bonander
(b) (6)
Casper, Wyoming (b) (6)

Dear Mr. Bonander:

This letter responds to your July 18, 2016, application to import under the U.S. Endangered Species Act (Act), a personal sport-hunted African elephant (*Loxodonta africana*) trophy taken in Zimbabwe during the 2015 hunting season. After careful review of your request for a permit, and after reviewing all available data and information on activities and circumstances occurring in Zimbabwe at the time you conducted your hunt, your application is being denied for the reasons outlined below.

The African elephant is listed as threatened under the Act with a special rule under Section 4(d) of the Act[1], which is set forth in regulations found at 50 CFR 17.40 (e)[2]. Under the special rule, issuance of an import permit can only occur if the U.S. Fish and Wildlife Service (Service) finds that the killing of the trophy animal intended for import would enhance the survival of the species [50 CFR 17.40(e)(6)(i)(B)], and the trophy is accompanied by a threatened species permit issued under 50 CFR 17.32[3]. To enhance the survival of the species, the importation must be associated with activities that provide a direct or indirect benefit to the species in the wild. In evaluating whether the killing of the trophy animal intended for import into the United States contributes to the enhancement of African elephant populations within a given country, the Service looks at a number of factors. Such factors may include: current elephant population estimates in a given country, whether said county has a valid national and/or regional management plan, is the plan currently being implemented and does it contain achievable and measurable objectives, does the plan take an adaptive management approach and how often is it reviewed and/or updated, the designated authorities responsible for overseeing elephant management and how they are funded, the level of human-wildlife conflict taking place and how it is being addressed, any anti-poaching efforts undertaken, habitat conservation measures currently in place, as well as the amount of revenue generated by elephant hunting and how it is utilized in supporting conservation projects and/or managing the species.

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1 The text of this Act can be found by using the search bar at the top of the following web page: http://Go.USA.Gov/xr6dd.

2 The text of this regulation can be found by using the search bar at the top of the following web page: http://Go.USA.Gov/xr6m3.

3 Ibis

The best available scientific and management data, as well as information provided to the Service by Zimbabwe Parks & Wildlife Management Authority (ZPWMA), Conservation Force, and Safari Club International, was used in our evaluation. In evaluating the available data and information on elephant hunting in Zimbabwe at the time your hunt occurred, the Service was unable to determine that the killing of African elephants in Zimbabwe, whose trophies are intended for importation into the United States, would enhance the survival of the species. Therefore, the import of sport-hunted elephant trophies taken in Zimbabwe during the 2015 hunting season cannot be authorized. A copy of the Division of Management Authority's finding for the 2015 hunting season is enclosed for your reference.

As provided in 50 CFR 13.29(a)[4], you may request reconsideration of our decision to deny your application. Such a request must be in writing with the original signature of the person requesting reconsideration or by that person's legal representative, must contain a certification statement as provided at 50 CFR 13.12(a)(5)[5], should refer to your file number, PRT–04846C, and must be received in this office within 45 days of the date of this letter. The reconsideration of the decision to deny your request will be based on the information you provided in your original application. As such, your letter requesting reconsideration must address how our decision to deny your application was based on a misinterpretation of the information provided in your application or information available to the Service when making the original denial or it must present clarification of this information. **Should you supply new information that changes the scope of your original application, a new application will need to be submitted to this office before such information can be considered.**

If you have any questions, please contact Supervisory Policy Specialist Michael S. Moore of this office: Division of Management Authority, Branch or Permits, MS:IA, 5275 Leesburg Pike, Falls Church, VA 22041-3803 (703-358-2104, ext. 1983).

Sincerely,

Timothy J. Van Norman, Chief
Branch of Permits
Division of Management Authority

Enclosure

4 The text of this regulation can be found by using the search bar at the top of the following web page: http://Go.USA.Gov/xYDUk
5 Ibis

United States Department of the Interior

FISH AND WILDLIFE SERVICE

International Affairs
5275 Leesburg Pike, MS: IA
Falls Church, VA 22041-3803

In Reply Refer To:
FWS/AIA/DMA/PRT– 04846C

MAY 16 2017

Mr. Richard (b) Bonander
(b) (6) (6)
Casper, Wyoming (b) (6)

Dear Mr. Bonander:

This letter responds to your April 6, 2017, letter from your representative, John J. Jackson, III, requesting reconsideration of the February 23, 2017, decision to deny your application for a permit to import a personal sport-hunted African elephant (*Loxodonta africana*) trophy taken on March 21, 2015, in Zimbabwe. After a thorough review of Mr. Jackson's response on your behalf, it is my decision to uphold the original denial of your application.

As you know, the African elephant is listed as threatened with a special rule under Section 4(d) of the U.S. Endangered Species Act (Act)[1]. Under the special rule, issuance of an import permit for a sport-hunted trophy can only occur if the U.S. Fish and Wildlife Service (Service) finds that the killing of the trophy animal would enhance the survival of the species, and the trophy is accompanied by a threatened species permit. To enhance the survival of the species, the importation must be associated with activities that provide a direct or indirect benefit to the species in the wild.

At the time you originally applied for a permit, the Service had reviewed the best available scientific and management data, including information made available to the Service by Zimbabwe Parks & Wildlife Management Authority (ZPWMA), Conservation Force, and Safari Club International, in evaluating the status of Zimbabwe's elephant management program at the time you conducted your hunt. Based on this material, the Division of Management Authority (DMA) made a finding on March 26, 2015, that we were unable to find that the import of an elephant trophy taken during the 2015 hunting season would meet the requirements of the Act and the special rule for African elephant. Mr. Jackson's April 6, 2017, letter asked that the Service reconsider your application, in part, based on his assertion that the enhancement finding failed to consider significant information submitted by Conservation Force, ZPWMA, and others, both before and after the finding was made, that would lead to a reversal of the Service's negative finding.

Regarding Mr. Jackson's assertion that the Service failed to consider significant information submitted by Conservation Force and ZPWMA when making its determination, the Service has taken into consideration all of the information available to the Service regarding elephant hunting

1 The text of this Act can be found by using the search bar at the top of the following web page: http://Go.USA.Gov/xr6dd.

in Zimbabwe at the time your hunt occurred (March 21, 2015). While Mr. Jackson's request for reconsideration included additional information that was not available to the Service at the time the March 26, 2015, finding was made, most of the information documented activities and actions that occurred after the conclusion of your hunt. While this new information may be relevant to hunts that occurred after our March 26, 2015 finding, it does not demonstrate that the situation in Zimbabwe, at the time of your hunt, was different than previously considered by the Service and would result in a revision of the March 2015 finding. Therefore, I am upholding the original denial of your application.

As provided in 50 CFR 13.29(e)[2], you may appeal to the Director of the Fish and Wildlife Service, through this office: Division of Management Authority, Branch of Permits, MS: IA, 5275 Leesburg Pike, Falls Church, Virginia 22041-3803. This appeal must be in writing with the original signature of the person requesting an appeal or of that person's legal representative, should refer to your file number, PRT-04846C, and must be submitted to this office within 45 calendar days of the date of this letter. The appeal must state the reason(s) and issue(s) upon which the appeal is based. Your written appeal must address how the decision to deny the reconsideration of your request was based on a misinterpretation of the information provided in your request for reconsideration, or it must present a clarification of this information. **Should you supply new information that changes the content of your original request for reconsideration, you must submit a new application to this office before such information can be considered.**

If you have any questions, please contact Supervisory Policy Specialist Michael S. Moore of this office: Division of Management Authority, Branch or Permits, MS:IA, 5275 Leesburg Pike, Falls Church, VA 22041-3803 (703-358-2104, ext. 1983).

Sincerely,

Craig Hoover, Chief
Division of Management Authority

2 The text of this regulation can be found by using the search bar at the top of the following web page: http://Go.USA.Gov/xYDUk

CONSERVATION FORCE

A FORCE FOR WILDLIFE CONSERVATION

† BARON BERTRAND DES CLERS, PH.D.
† JAMES G. TEER, PH.D.
† BART O'GARA, PH.D.
† DON LINDSAY

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April 6, 2017

Chief Tim Van Norman
Branch of Permits, Division of Management Authority
U.S. Fish and Wildlife Service, MS: IA
5275 Leesburg Pike
Falls Church, Virginia 22041

APR 13 2017

BY EMAIL AND FEDERAL EXPRESS

Re: Request for Reconsideration of Denial of Permit Applications PRT-04846C and PRT-04205C

Dear Chief Van Norman:

We request reconsideration of the denials of two applications for permits to import hunting trophies of elephant taken in Zimbabwe in 2015 ("Denials"). The first application was submitted by Richard Bonander, PRT-04846C, for a bull elephant taken in the Ngamo/Sikumi Forest Block in Zimbabwe on March 21, 2015. The second was submitted by Michael Jines, PRT-04205C, for a bull elephant taken in the Mbire CAMPFIRE District in Zimbabwe on February 25, 2015. Conservation Force represents both Applicants.

The Denials should be reconsidered and reversed for eight primary reasons. First, they rely upon the *Enhancement Finding for African Elephant Taken as Sport-Hunted Trophies in Zimbabwe on or after January 1, 2015*, dated March 26, 2015 ("Finding"). But the Finding fails to consider significant information submitted by Conservation Force, Zimbabwe's Parks and Wildlife Management Authority ("ZPWMA"), and others. If considered, the negative conclusion would have to be reversed. The information provided:

- Establishes that Zimbabwe has the most up-to-date management plan for African elephant in the world, with adaptive and regionally-specific action items, clear assignment of responsibilities, and means of verifying its implementation successes;
- Establishes that Zimbabwe has a relatively stable elephant population, as determined by a recent countrywide survey;
- Demonstrates that Zimbabwe has been effectively enforcing laws and policies to protect elephant and other species, and has implemented new measures and ramped-up national and local efforts to combat poaching;
- Demonstrates that hunting offtakes are sustainable and based on the consideration of all causes of elephant mortality, biological and critical social factors, and scientific recommendations;
- Reflects the full cooperation of ZPWMA in responding to the FWS' information demands, including production of sensitive budget information that underscores the essential role hunting, especially elephant hunting, plays in supporting wildlife conservation, management, and protection, both in the Parks estate and community areas;
- Evidences how the government's grant of Appropriate Authority to local landholders has created a public-private-community partnership that obligates all stakeholders to invest in protection and conservation of wildlife on their lands; and

- Proves that licensed, regulated hunting enhances the survival of elephant and other species in the country by securing habitat, generating management funding, underwriting and supporting anti-poaching, and incentivizing greater tolerance of elephant by rural community members.

In sum, because the information provided demonstrates that the enhancement standard is met, and this information was not relied upon in denying the applications, we respectfully request reconsideration and reversal of the Denials and issuance of the requested import permits.

Reason for Reconsideration 1: Failure to Consider Best-Available Information

In the Finding, the FWS repeatedly stated it would review its negative conclusion if additional information was provided.[1] But the FWS has not done so. It has not considered hundreds of pages of information in the Denials, which rely upon the Finding.

The Finding was made on March 26, 2015. Information has been provided to the FWS from April 17, 2014 through as recently as February 2017 by Conservation Force, ZPWMA, the IUCN African Elephant Specialist Group ("AfESG"), the Safari Operators Association of Zimbabwe ("SOAZ"), Safari Club International ("SCI"), individual hunting operators, and others.[2] Most of this data has ***not*** been discussed in the Finding or in an updated finding, in the two-plus years since the Finding was made.

Rather, entire paragraphs in the Finding are identical to the July 22, 2014 negative enhancement finding.[3] Because they are not updated from July 2014, they fail to address points made by Conservation Force and ZPWMA to correct errors in that July finding. Moreover, the Finding states in several places that the FWS was not provided with specific information. However, Conservation Force previously cited to where the information was provided,[4] and ZPWMA submitted additional data in its prompt and thorough July 2015 response ("ZPWMA July 2015 Response") to the FWS' third questionnaire, dated May 12, 2015 (***after*** the Finding). The ZPWMA July 2015 Response was not considered in the Denials, which rely upon the Finding. However, the July 2015 Response provides substantial information the FWS asserts is missing.[5]

This up-to-date information cannot be ignored. It demonstrates that Zimbabwe's hunting program is well-managed and sustainable. It shows how hunting in Zimbabwe enhances the survival of the elephant. The FWS' failure to consider this information requires reconsideration of the Denials. The Finding is based on outdated information, and its reservations have been resolved. Once the new information is considered

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[1] E.g., *Finding*, p. 1, 3, 6, 11.

[2] An index of the information previously submitted to the FWS is attached.

[3] *Enhancement Finding for African Elephants Taken as Sport-Hunted Trophies in Zimbabwe During 2014*, dated July 22, 2014, p. 2 ¶ 6; p. 3 ¶¶ 1-3; p. 4 ¶¶ 1-2; p. 5 ¶¶ 2-3; p. 7 ¶¶ 3-4; p. 8 ¶ 4; p. 9 ¶ 1 (changed "2002 Panel of Experts" to "1997"); p. 9 ¶ 4; p. 10 ¶¶ 1-4; p. 11 ¶¶ 3-5; p. 12 ¶¶ 1-2, 5; p. 13 ¶ 1-2; p. 17 ¶ 3; p. 18 ¶¶ 2, 4; see also paragraphs in which several sentences are identical or nearly so: p. 4 ¶¶ 3-4; p. 5 ¶ 1; p. 6 ¶ 3-4; p. 7 ¶ 2; p. 8 ¶ 3; p. 9 ¶ 3; p. 14 ¶ 4 (changed numbers of RDCs); p. 16 ¶ 4; p. 17 ¶ 5; p. 18 ¶ 3.

[4] Conservation Force also provided an Appendix that cross-referenced statements claiming not to have information against the FWS' April 4, 2014 questionnaire to ZPWMA, which did not ask for much of this information. Conservation Force, *Comment Opposing the Negative Enhancement Finding for African Elephant Taken as Sport-Hunted Trophies in Zimbabwe in 2014*, dated Oct. 16, 2014 ("*CF Oct. Comment*"), passim, & Appendix 1.

[5] E.g., Compare *Finding*, p. 9, 11 (seeking revenue information), p. 11 (seeking offtake information) with ZPWMA July 2015 Response, p. 36-43 (providing revenue and offtake tables).

by the FWS, the "enhancement" generated by elephant hunting is clear, and the requested permits should issue.

The urgency of issuing these permits has not changed since the suspension was imposed in April 2014. As the Finding recognizes, elephant hunting generates operating budget revenue for ZPWMA, incentives for Zimbabwe's community-based natural resources management program (CAMPFIRE), anti-poaching, and more. The information provided, including two CAMPFIRE reports, a SOAZ report, the ZPWMA July 2015 Response and more, makes clear that American elephant hunters are the largest source of these benefits.[6] Continued refusal to issue import permits jeopardizes this enhancement and the survival of the species.

The failure to consider the best-available information is made worse because ZPWMA responded promptly to the FWS' requests. ZPWMA responded to the first questionnaire within two weeks. Its Director-General and high-level representatives immediately traveled to DC to reinforce their response. ZPWMA responded to the second questionnaire in under six weeks; responded to third—not considered in the Finding—in five weeks; responded to the fourth—not considered in the Finding—in two weeks; and responded to the fifth —not considered in the Finding—within several weeks, with the final plan prioritization completed within six months. ZPWMA has repeatedly redirected its resources to provide information to the FWS. But the FWS has repeatedly moved the target to create an unreachable standard and demanded additional, more intensive information. The bar has been raised beyond "enhancement." The FWS has acknowledged that elephant benefit from well-managed hunting.[7] But the Finding seems to require more than well-managed —it seeks management perfection. That is simply not possible, either in Zimbabwe or in this country (even the FWS is constrained by limited resources).

The information submitted shows that licensed, regulated hunting increases habitat security, generates law enforcement funding and support, and incentivizes tolerance for elephant. It shows a sustainable use of elephant at a level far too low to be detrimental. It shows that the enhancement standard, as originally defined[8] has been met. Thus, the Denials should be reconsidered and reversed.

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[6] E.g., *ZPWMA July 2015 Response*, p. 40-41 ("The US hunting market constitutes 51% and 54% of elephant trophy hunting in Zimbabwe for the years 2013 and 2014 respectively."); CAMPFIRE Association, *Trophy Imports Suspension and the CAMPFIRE Program*) (2014), p. 4 (*"CAMPFIRE Association Report"*) (U.S. hunters represent two-thirds or more of CAMPFIRE clients); E. Gandiwa, *Proceedings of the CAMPFIRE Stakeholders' Workshop: Towards the Development of a New Elephant Management Plan and Policy* (Nov. 2014) (*"CAMPFIRE Workshop Proceedings"*), p. 6-21; CAMPFIRE Association, *CAMPFIRE Hunting Income & Distribution* (Dec. 1, 2015) (*"CAMPFIRE Income Analysis"*), p. 6; ZPWMA, Presentation, *Legal Trade, Conservation, and Rural Livelihoods: A Zimbabwean Perspective* (Dec. 2016), p. 19; SOAZ, *Status of Elephant Populations, Hunting, and Anti-Poaching Effort in Safari Areas in Zimbabwe* (2014), p. 3-4 (*"SOAZ Report"*)

[7] E.g., FWS, *Suspension of Import of Elephant Hunting Trophies Taken in Tanzania and Zimbabwe in 2015 and Beyond, Questions & Answers* (2014).

[8] In denying import permits for elephant from Tanzania, the FWS defined enhancement as: "activities that provide a direct benefit to the specie being hunted. Such benefits could include the use of revenue generated by the hunt to support conservation projects or to manage the species. Other benefits that could result from activities that enhance the survival of the species include improving human-wildlife conflicts, anti-poaching efforts, or habitat conservation." According to this standard and definition, and not the one created in the Finding, there is no doubt the importation of sport-hunted elephant into the U.S. enhances the species.

Reason for Reconsideration 2:
The Denials Fail to Consider Zimbabwe's State-of-the-Art Elephant Management Plans

ZPWMA has recently adopted and is implementing the most cutting-edge elephant management regime among range nations, the *Zimbabwe Elephant Management Plan (2015-2020)* ("Plan"). This effort attests to ZPWMA's commitment to elephant management and conservation. The new Plan further exemplifies the importance of sport-hunting in this system. The Denials fail to consider this essential new Plan, which the FWS has had for over one year.

Instead, the outdated Finding errs by considering *Elephant Management in Zimbabwe* to be the country's management plan, despite being told it was not.[9] The FWS' concerns about a claimed lack of measurable outcomes in Zimbabwe's actual former management plan, the *Policy and Plan for Elephant Management in Zimbabwe*, have been resolved. As the FWS was repeatedly told, a new management plan was adopted, with specific action items, deliverables, and deadlines (as suggested was necessary by the April and July negative enhancement findings).[10] The FWS knew of the new Plan's details because the FWS received the *Plan Workshop Proceedings* in December 2014, before the Finding was made.[11] The FWS was also informed that Zimbabwe would manage each main range area adaptively pursuant to a regional plan. The FWS was sent the proceeding of regional workshops, and the final regional plans as part of the final national Plan.[12] And in November 2016, the FWS was provided with information on the implementation and prioritization of these plans at the request of the Chief of Permits.[13] In short, throughout the Plan's drafting, ZPWMA and Conservation Force kept the FWS fully apprised of the status and what the Plan would entail. However, little of this information was considered in the Finding or the Denials.

Had the new Plan been considered, these permits would have to be approved. The Plan incorporates an adaptive management framework with higher-level Targets, Key Components, Strategic Objectives, and Outputs. It breaks each Key Component into specific management actions, the achievement of which will be measured and verified through Key Performance Indicators ("KPIs") and Means of Verification of KPIs. The Plan sets deadlines and assigns specific responsibility for achieving each Action. It focuses on five key components: 1. Protection and Law Enforcement, 2. Biological Monitoring and Management, 3. Social,

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[9] *CF Oct. 2014 Comment*, p. 8 ("Elephant Management in Zimbabwe 'is not a management plan,' and FWS should not expect 'specific measurable or management actions' to be in that particular document") & related attachments.

[10] *CF June 2014 Comment*, p. 13 & related attachments; *CF Oct. 2014 Comment*, p. 9 & related attachments; *CF Dec. 2014 Comment*, p. 3 & related attachments; CF Email to T. Van Norman forwarding invitation to national workshop (Nov. 13, 2014); CF Email to T. Van Norman forwarding Workshop agenda (Dec. 1, 2014); CF Email to T. Van Norman forwarding summary of Plan Workshop (Dec. 5, 2014); *ZPWMA Dec. 2014 Response*, p. 18; *ZPWMA July 2015 Response*, p. 9-14, 18-19.

[11] CF Email to T. Van Norman forwarding Proceedings of the National Elephant Management Plan Workshop (Dec. 23, 2014) ("*Plan Workshop Proceedings*").

[12] CF Email to T. Van Norman forwarding preparatory documents for Sebungwe workshop (May 4, 2015); CF Email to T. Van Norman forwarding Mana Pools Workshop Proceedings (May 5 2015); CF Email to T. Van Norman forwarding Sebungwe workshop agenda (May 8, 2015); CF Email to T. Van Norman forwarding Sebungwe workshop fact sheet (May 14, 2015); CF Email to T. Van Norman forwarding South East Lowveld Workshop Proceedings (Sept. 30, 2015); CF Email to T. Van Norman forwarding final print of Plan (Feb. 29, 2016); *ZPWMA July 2015 Response*, Attachments.

[13] L. Nyaguse (ZPWMA) Email to T. Van Norman forwarding Zimbabwe National Elephant Supplementary Management Plan (2015-2010) (Nov. 9, 2016) ("*Plan Supplement*").

Economic, and Cultural Framework, 4. Building Conservation Capacity, and 5. Coordination, Collaboration, and Program Management.[14]

The Plan breaks down elephant management by range, as their challenges differ. For example, authorities must manage overpopulated elephant and provision of water in North West Matabeleland compared to a reduced population targeted to recover in Sebungwe. These differences are addressed in the actions and indicators of each regional plan.[15]

The Plan provides for accountability, transparency, and effective implementation in the terms of reference for an Elephant Manager tasked with directing elephant management in Zimbabwe. The Plan also created a National Elephant Management Committee and four range-specific committees to review progress and oversee implementation.[16]

Examples of "Protection" activities include establishing a rapid-response anti-poaching unit in conjunction with the Zimbabwe Republic Police, expanding ZPWMA's informer networks, and connecting national law enforcement databases. Monitoring activities include periodic surveys and setting Thresholds of Potential Concern as early-warning indicators in key habitats. An example KPI for "Building Conservation Capacity" is to channel most income from elephant hunting back into elephant management, with ongoing oversight through reports on funds available and utilized.[17] As these examples show, the Plan incorporates ***specific*** actions and KPIs, and specific oversight mechanisms.

The Plan addresses human-elephant conflict in the Social, Economic, and Cultural Framework component. The Plan recognizes there is no single solution to conflict, and commits to "undertake additional research on problem animal control and minimizing conflict." It emphasizes the importance of local communities' tolerance towards elephants through a system of benefits-sharing as a long-term solution to conflict.[18]

The Plan also specifically integrates licensed, regulated elephant hunting as a management tool:

> To have a future, elephant must have a value. Value to the governing authorities and to the local people. The greater the value, the greater the tolerance of them is likely to be ... Regulated sport hunting converts wildlife into assets for the benefit of local people and the country as a whole... elephant and other wildlife populations will be negatively affected though reduced conservation efforts arising from low funding and reduced goodwill from the communities, when... the elephant has the economic potential to raise adequate funds to support itself and other species. For these reasons, Zimbabwe confirms its commitment to the sustainable use of elephant and other wildlife in this Action Plan.[19]

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[14] *Plan*, p. 16-17.

[15] *Plan*, p. 38-80 (Annexes 9.4-9.7).

[16] *Plan*, p. 13-14, 35-37.

[17] E.g., *Plan*, p. 19-27.

[18] *Plan*, p. 15.

[19] *Plan*, p. 12.

The Plan addresses the Finding's concerns on every level. It implements an effective management system, with the necessary "specific goals and measures with specific actions to be taken."[20] Moreover, ZPWMA provided to FWS a 2016 report on its progress in implementing the Plan and prioritizing implementation, including of the regional plans. The Plan Supplement emphasizes law enforcement and training to combat poaching and ivory trafficking.[21] The FWS requested the prioritization, and ZPWMA again demonstrated its good faith in preparing and providing the document, which was not considered in the Finding or the Denials. Because the Finding's concerns are resolved and new information reveals an effective, adaptive management plan and implementation thereof in Zimbabwe, the Denials should be reconsidered and reversed.[22]

Reason for Reconsideration 3:
Zimbabwe has Current Elephant Population Information that Guides its Sustainable Use

The AfESG recently estimated Zimbabwe's elephant population at 82,630 ± 8,589 across a range of 81,228 km^2.[23] Zimbabwe maintains the second-largest elephant population in Africa, at a level nearly double its estimated carrying capacity.[24] The population is most concentrated in the North West Matabeleland and South East Lowveld ranges. The current national estimate is approximately 6,000 lower than the 2001 countrywide estimate, a percentage calculated as "not statistically significant" by the survey's authors.[25] Zimbabwe's current elephant population is 20% larger than its population in 1997 (66,000), when the FWS made a positive enhancement finding. The Finding does not explain why a 20% increase is insufficient.[26]

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[20] *Finding*, p. 6. The Plan applies a multi-tiered approach, using tailored goals leading to achievement of the "Long-Term Vision," which is: "To conserve elephants at levels that will enable them to contribute to the conservation of biodiversity, national development and Zimbabwe's cultural heritage." The Plan establishes intermediate "Targets" to achieving these goals, which are in line with the 1997 *Policy and Plan*: "1. To maintain at least four demographically and genetically viable elephant populations in Zimbabwe[;] 2. To maintain or increase core protected range of elephant in Zimbabwe[;] 3. To maintain numbers/density of elephant at levels that do not adversely impact on biodiversity conservation goals while contributing to economically viable and sustainable wildlife-based land uses in Zimbabwe." As in the draft provided to the FWS in December 2014, the final Plan is organized by "Key Components," and then "Strategic Objectives" that explain the "Key Components." "Outputs" describe the desired outcomes, and are to be achieved through implementation of "Key Activities/Actions." That implementation is monitored by the KPIs and Means of Verification of the KPIs.

[21] *Plan Supplement*, p. 6.

[22] As ZPWMA explained, Zimbabwe conserves and manages elephant on every level. Zimbabwe and bordering range states have formed Trans-Frontier Conservation Areas ("TFCAs") to address the elephant's migratory nature and cross border populations. Further, through the Plan Zimbabwe implements the action plans adopted by the Southern African Development Community ("SADC"), and the SADC Regional Elephant Management Strategy of 2007. E.g., *ZPWMA April 2014 Response*, p. 12; *ZPWMA July 2015 Response*, p. 15; *CF June 2014 Comment*, p. 12 & related attachments; *CF Oct. 2014 Comment*, p. 9 & related attachments.

[23] IUCN/AfESG, African Elephant Status Report 2016 (Sept. 2016), publicly available at https://www.dropbox.com/s/7a8w3kk6r9hzm0r/AfESG%20African%20Elephant%20Status%20Report%202016.pdf?dl=1.

[24] *Plan*, p. 3.

[25] *Plan*, p. 3. As explained above, the Management Plan incorporates regional plans to address challenges unique to each range and manage elephant within regional targets.

[26] The Finding suggests an increase to over 100,000 elephant would be acceptable. P. 8. As ZPWMA, Conservation Force, Rowan Martin, and others pointed out, a population of that size would be a catastrophe for the country's biodiversity. The Finding does not account for the expansion in Zimbabwe's elephant since 1997, or the management measures implemented since then. Zimbabwe's elephant population has rebounded incredibly, from a low of 4,000

Worse, the Finding does not rely on this up-to-date estimate, although the FWS received the preliminary survey results in December 2014.[27] Nor does the Finding rely on the best-available information in the FWS' possession as of March 2015, which included comments from the AfESG and numerous survey results.[28] The Denials should be reconsidered because the Finding relies upon outdated data that was proven to be inaccurate by Conservation Force, ZPWMA, and the AfESG.

For example, the Finding reuses language that cites a statistic from *Elephant Management in Zimbabwe*. The statement was disavowed by its author, and Conservation Force explained how the percent limitation was being taken out of context.[29] The Finding's failure to consider information that undercuts a "fact" on which its negative conclusion was based is clear grounds for reconsideration. Similarly, the Finding admits the April finding erroneously interpreted the AfESG's Elephant Database by misconstruing its data quality categories. This error was pointed out in CF's June 2014 Comment and in a May 30, 2014 email from Dr. Holly Dublin, AfESG Chair.[30] It was corrected in the July enhancement finding.

However, the July finding continued to ignore pertinent information in the database, prompting Dr. Dublin to send a November 3, 2014 comment in which she corrected several critical points of information. First, the addition of a 2007 survey resulted in the addition of 30,000 "Definite" elephant in Zimbabwe. Second, the results of four recent surveys did not show a "substantial decline," as the July finding stated, but largely reflected stable or increasing populations. The Finding apparently accepted these comments, and edited the prior statements to incorporate Dr. Dublin's corrections.[31]

However, Dr. Dublin offered three more corrections not discussed in the Finding. Instead, the challenged language was copied and pasted from the July document into the Finding.

- Dr. Dublin criticized the July finding's dismissal of a 2013 survey in Save Valley Conservancy for so-called "double counting," stating that, even if double-counting occurred, the count still reflected an increase in the elephant population;

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in 1900. *ZPWMA July 2015 Response*, p. 3; *CF June 2014 Comment*, p. 7-8 & related attachments; *CF Oct. 2014 Comment*, p. 7, 10 & related attachments. Compare FWS, *Enhancement Finding for African Elephants Taken as Sport-Hunted Trophies in Zimbabwe* (July 2, 1992), p. 1.

[27] CF Email to T. Van Norman forwarding *Plan Workshop Proceedings*.

[28] H. Dublin Email to T. Van Norman attaching AfESG Letter/Comment on July finding (Nov. 3, 2014), p. 2-9 ("*AfESG Letter*"); Aerial Survey of Elephants and Other Large Herbivores in the Mid-Zambezi Valley; 2007 Aerial Survey of Elephants and Other Large Herbivores in North-West Matabeleland; 2010 Aerial Survey of Elephants and Other Large Herbivores in Chewore Safari Area; 2013 Aerial Survey of Elephants and Other Large Herbivores in the Save Valley Conservancy; and 2013 Aerial Survey of Elephants and Other Large Herbivores in Gonarezhou National Park.

[29] *CF Oct. 2014 Comment*, p. 9, 15 & related attachments.

[30] Compare *Finding*, p. 7; with *CF June 2014 Comment*, p. 9 & related attachments; H. Dublin Email to T. Van Norman commenting on the April finding's misinterpretation of the AfESG Database (May 30, 2014).

[31] Compare *AfESG Letter*, p. 2 ("The AED shows, however, that three surveys carried out in this period ... estimated higher totals than their respective previous, comparable surveys, although the differences were not significant. A fourth survey, Chewore (2010), resulted in an estimate lower than its previous, comparable survey, but the difference was also not statistically significant. Furthermore, the 2010 survey for Chewore did not cover the entire Zambezi Valley ecosystem, and therefore it is possible that the apparent decline, however slight, may be due to elephant movements within the ecosystem rather than to an actual decline.") with July finding, p. 6; *March Finding*, p. 7.

- Dr. Dublin concluded that a 4% carcass ratio in a 2013 survey of Gonarezhou National Park was a "reasonable figure," and the July finding erroneously "conflat[ed] ... carcass ratios ... and mortality rates, and its conclusion is unwarranted";
- Dr. Dublin noted that updated PIKE data was publicly available months before the July finding was made, yet "the finding stated that 2012 and 2013 data were not available," and pointed out that the two PIKE sites in Zimbabwe "have relatively small elephant populations and are by no means intended to be representative of the situation in the country as a whole."[32]

Given that Dr. Dublin is one of the world's foremost experts in elephant, due deference should have been given to her comments and suggestions. Conservation Force made similar points in our June and October comments as well, and provided comments from the authors of the Save Valley survey report responding to the FWS' statements.[33] We provided fice surveys pending the AfESG's review and not included in the AfESG's or FWS' estimates, and submitted updated PIKE information showing the Proportion of Illegally Killed Elephant had declined at the Zimbabwe sites[34]—contrary to the July finding's statements, copied-and-pasted into the Finding. The Denials' failure to review this best-available information, and reliance upon out-of-date or misinterpreted information, requires reconsideration.

Reason for Reconsideration 4: The Best-Available Information Demonstrates that Zimbabwe has been Enforcing its National Regulations as Effectively as Possible

ZPWMA is succeeding in managing and conserving its elephant. The most compelling evidence is the historic increase in its population, to become Africa's second-largest. ZPWMA achieved these results by largely curbing poaching and successfully prosecuting poachers as a result of adaptive and pro-active law enforcement measures. ZPWMA has also implemented a system of sharing responsibility with the private sector and communal landholders so as to share the financial burden of its management and enforcement obligations. The Finding fails to acknowledge these achievements and responsibility-sharing.[35] Its failure to do so requires reconsideration, and reversal of the Denials.

Evidence of ZPWMA's enforcement success was provided in their April 2014 and July 2015 Responses, and in Conservation Forces' June 2014 and October 2014 Comments. For instance, ZPWMA rapidly responded to the 2013 Hwange poisoning incident. Working with the hunting operator's team to track the poachers,

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[32] *AfESG Letter*, p. 4-5.

[33] CF Email to T. Van Norman forwarding response from authors of the Save Valley Conservancy survey (Jan. 6, 2015); *CF Oct. 2014 Comment*, p. 13 & related attachments.

[34] E.g., 2005 Aerial Survey of Elephants and Other Large Herbivores in the Mid-Zambezi Valley; 2007 Aerial Survey of Elephants and Other Large Herbivores in North-West Matabeleland; 2010 Aerial Survey of Elephants and Other Large Herbivores in Chewore Safari Area; 2013 Aerial Survey of Elephants and Other Large Herbivores in the Save Valley Conservancy; and 2013 Aerial Survey of Elephants and Other Large Herbivores in Gonarezhou National Park; *see CF June 2014 Comment*, p. 4-7 & related attachments; *CF Oct. 2014 Comment*, p. 11 & related attachments.

[35] The FWS recognizes "there may be limited resources available for elephant management." *Finding*, p. 2. However, the FWS does not account for this in evaluating ZPWMA's efforts and results. "Enhancement" does not call for unlimited resources and perfect implementation, it seeks benefits. The benefits provided through the sport-hunting of elephant are clear and convincing, and the Denials should be reversed.

ZPWMA successfully arrested all 35 members of the team. ZPWMA's investigation and prosecution efforts led to the deterrent sentencing of each poacher to terms of 9 to 16 years in prison.[36]

ZPWMA specifically responded to the threat of poaching in Hwange by improving radio communications, adding aerial surveillance, and holding 35 public awareness meetings in the area.[37] ZPWMA then stepped-up its anti-poaching nationally by adopting a number of "Urgent Measures." ZPWMA acted to increase poaching penalties, criminalize the use of cyanide in poaching, increase air surveillance of protected areas, collaborate with national law enforcement and military agencies to raise elephant poaching to "a level of National Security in Zimbabwe," improve intelligence-sharing across international borders, and other important undertakings.[38] ZPWMA also held a judiciary awareness program to ensure full implementation of relevant poaching laws and penalties throughout prosecution and sentencing.[39]

ZPWMA directs most of its financial resources to anti-poaching and enforcement. As shown in the July 2015 Response, most of ZPWMA's budget (77%) is allocated for staff costs and patrol provisions.[40] These expenditures fund anti-poaching throughout the elephant range. Despite financial constraints, ZPWMA has been able to continuously hire to expand the number of patrol days in the field. ZPWMA has a staff of 1,504 active field rangers, with the intent to add more.[41] ZPWMA has shown that it can mobilize when called upon: after the Hwange poisoning, a new station with 15 field rangers was established in the area.[42]

Over 80% of spending under the new elephant management Plan has been on law enforcement (anti-poaching) and trainings, with law enforcement identified as the number one priority going forward.[43] The budget and operational data provided in the ZPWMA July 2015 Response and Plan Supplement addresses the FWS' asserted lack of information in the Finding. And although financial constraints exist in Zimbabwe (as in most range states), ZPWMA has effectively and efficiently maximized the impact of every dollar spent on anti-poaching. ZPWMA's results in curbing poaching speak for themselves.

The Finding continues to rely on outdated, unfounded criticisms from the July finding that were corrected by Conservation Force and ZPWMA. First, though the Finding claims not to have received information on Zimbabwe's poaching arrests and prosecutions, that information was not requested until May 2015, yet was provided in ZPWMA's April 2014 Response. It would be unfair to base a negative finding on data that had not been requested. But the data ***was*** provided, and should have been reviewed.[44]

Further, the Denials mistaken rely on the Finding's comments and interpretation of outdated ETIS reports. Conservation Force objected to these reports being taken out of context in our October 2014 Comment,

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[36] *ZPWMA July 2015 Response*, p. 35; *CF Oct. 2014 Comment*, p. 18 & related attachments.

[37] *ZPWMA July 2015 Response*, p. 35; *ZPWMA April 2014 Response*, p. 13; *ZPWMA Dec. 2014 Response*, p. 16-20; *CF Oct. 2014 Comment*, p. 18 & related attachments.

[38] *ZPWMA July 2015 Response*, p. 27-31; *ZPWMA Dec. 2014 Response*, p. 16-18.

[39] *ZPWMA July 2015 Response*, p. 34.

[40] *ZPWMA July 2015 Response*, p. 36-41.

[41] ZPWMA hired 100 rangers in 2014. *ZPWMA July 2015 Response*, p. 32-33.

[42] *ZPWMA July 2015 Response*, p. 27; *ZPWMA April 2014 Response*, p. 13.

[43] *Plan Supplement*, p. 3-4.

[44] *ZPWMA April 2014 Response*, p. 12, 14.

and provided evidence of improvements since 2010.[45] The Finding's reuse of these paragraphs, whose validity and applicability were challenged, merits reconsideration.

Finally, as discussed further under "Local Conservation Efforts," the Parks and Wildlife Act Chapter 20:14 devolved authority to manage and benefit from wildlife on communal and private lands to the landholders. In Safari Areas, ZPWMA leases concessions to pre-qualified hunting operators, which gives them authority to manage and benefit from approved wildlife in those areas.[46] "ZPWMA is engaging private players in co-management in some areas... this will help in resource mobilization and management for law enforcement. Long-term lease agreements (10-25 years) are being entered into to manage some protected areas."[47] In certain areas, ZPWMA partners with safari operators[48]; in others, they partner with non-profits, such as the Tashinga Initiative in the Zambezi Valley and WWF in the Hwange-Sanyati Biological Corridor.[49] In these ways, ZPWMA is sharing responsibility for enforcement of national regulations. This allows ZPWMA to do more with less, and has been especially crucial since receipts from hunting have fallen since the FWS suspension on ivory imports.

Reason for Reconsideration 5: Elephant Hunting in Zimbabwe is a Sustainable, Beneficial Use

ZPWMA's elephant hunting program is sustainable. Information submitted to the FWS demonstrates that quotas and offtakes are responsibly set in a participatory process, considering a range of inputs including all causes of elephant mortality; ZPWMA allocates quotas by region and locality; and recent poaching has remained fairly low, especially in comparison to other range states. This information has been submitted to the FWS on multiple occasions, including but not limited to:

- April 2014: poaching statistics; poacher arrest and prosecution statistics; four-page description of ZPWMA's quota-setting process;
- June 2014: poaching statistics in CAMPFIRE areas;
- December 2014: poaching and PAC statistics; offtake percentages from management, hunting, and trade in skins; two-page supplemental explanation of ZPWMA's quota-setting process;
- December 2014: hunting and PAC offtakes; quota utilization in CAMPFIRE areas;
- December 2014: carcass observance and estimates from the 2014 aerial survey;
- March 2015: updated MIKE/PIKE statistics;
- May 2015: poaching statistics from Mana Pools workshop;
- May 2015: poaching and offtake statistics in the Sebungwe;
- July 2015: carcass observance and estimates from the 2014 aerial survey; PIKE data; offtakes from six categories requested by the FWS; poaching and poacher investigation, arrest, and prosecution statistics; five-page supplemental explanation of ZPWMA's quota-setting process; quota allocation by range;
- September 2015: poaching and hunting offtakes from the South East Low Veld workshop;
- December 2015: hunting off-takes and quota utilization in CAMPFIRE areas;

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[45] *CF Oct. 2014 Comment*, p. 22 (pointing out that the ETIS report was known to "confound" legal and illegal trade in small ivory products) & related attachments.

[46] *ZPWMA April 2014 Response*, p. 23-25.

[47] *ZPWMA Dec. 2014 Response*, p. 19.

[48] *ZPWMA July 2015 Response*, p. 34.

[49] *ZPWMA July 2015 Response*, p. 33.

- December 2016: two-page supplemental explanation of ZPWMA's quota-setting process;
- And more.[50]

This long list of information provided refutes the Finding's complaint that the FWS did not have "adequate information" about elephant offtakes, poaching, or quota-setting. The information was available. But the Denials do not consider it. If it had been considered, the FWS would have had to make a positive finding.

This best-available information demonstrates that ZPWMA's quotas are "scientifically determined" not to "compromise[e] [the species'] biological proliferation... In Zimbabwe, determination and implementation of hunting quotas goes through a rigorous quota-setting methodology" that accounts for all mortalities, including from hunting, poaching, PAC, natural causes and disease. In setting quotas, ZPWMA considers population sizes, trends, and densities; property sizes and habitat quality; environmental changes; human-wildlife conflict, national policies, and management targets; poaching trends; land tenure; trophy quality; hunt success; ranger monitoring; species sensitivity and research on the species; and more.[51] Quotas are set in participatory workshops for each range area. While stakeholders may propose an initial quota, their proposals are reviewed and revised as needed by ZPWMA ecologists to ensure the quotas are assessed at a sustainable level, having negligible impact on the population.[52] In 2014, Zimbabwe's offtake quota was set under 300 elephant; in 2016, it was set at 400.[53] The level of ***offtake*** authorized is well below that of ***export*** allowed under Zimbabwe's CITES quota (500 elephant), for good reason—exports may be delayed due to transport, taxidermy/processing, or permitting issues.

ZPWMA's 2014 quota of 300 mature elephant bulls represents only 0.37% of the total elephant population (82,000+). Zimbabwe's 2016 quota represents only 0.49%. These percentages are comfortably below the sustainability threshold of 0.6-0.75%. Most critically, however, actual offtakes are even lower, on average only 204 mature elephant bulls per year. That represents only 0.25% of Zimbabwe's elephant population. The Denials should be reconsidered and reversed, as there can be no question this limited use of elephant through sport- hunting is sustainable.

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[50] *ZPWMA April 2014 Response*, p. 12, 14, 19-22; *CAMPFIRE Association Report*, p. 2; *ZPWMA Dec. 2014 Response*, p. 16, 22-25; *CAMPFIRE Workshop Proceedings*, p. 6-24; CF Email to T. Van Norman attaching newest MIKE/PIKE data (Mar. 11, 2015); *Proceedings of the Mana Pools Anti-Poaching Workshop* (May 2015); CF Email to T. Van Norman attaching background data on elephant in the Sebungwe range (May 11, 2015); *ZPWMA July 2015 Response*, p. 22-27, 43-49; *Proceedings of the South East Lowveld Elephant Management Planning Workshop* (Sept. 2015); CF Email forwarding *Hunting Income Analysis of CAMPFIRE Districts from Hunting* (Dec. 1, 2015); ZPWMA, Presentation, *Legal Trade, Conservation, and Rural Livelihoods: A Zimbabwean Perspective* (Dec. 2016), p. 5-6.

Publicly available data from the Great Elephant Census identified Zimbabwe as having one of the four lowest carcass ratios in Africa, behind only Uganda, Malawi, and Botswana, publicly available at www.greatelephantcensus.org.

[51] E.g., *ZPWMA Apr. 2014 Response*, p. 19-22; *ZPWMA Dec. 2014 Response*, p. 22-25; *ZPWMA July 2015 Response*, p. 43-47; ZPWMA, Presentation, *Legal Trade, Conservation, and Rural Livelihoods: A Zimbabwean Perspective* (Dec. 2016), p. 5-6.

[52] *ZPWMA July 2015 Response*, p. 43-46; ZPWMA, Presentation, *Legal Trade, Conservation, and Rural Livelihoods: A Zimbabwean Perspective* (Dec. 2016), p. 5-6. Licensed, regulated hunting has nominal effect on elephant population, because of the selectivity of the harvest. E.g., *CF June 2014 Comment*, p. 3, 9-10 & related attachments (including R. Martin, *Second Report: Trophy Hunting from Declining Population* (2014), p. 8, 10, 15, 18-20, & R. Martin, *Background Study, Elephants* (2015), p. 34, 56).

[53] *ZPWMA July 2015 Response*, p. 44, 46.

Further, the extensive documentation provided by ZPWMA, Conservation Force, and others demonstrates that other offtakes, including poaching and PAC, are sustainable. Poaching has largely been controlled in the last several years, and PAC is kept in check through the incentives generated by CAMPFIRE (please see the next section).[54]

Poaching levels have declined in Zimbabwe, and across Africa, since the worst of the impact in 2011.[55] As shown in ZPWMA's July 2015 Response, a decline in elephant poaching is evident since the high of 223 in 2011, to 212 in 2012 and 194 in 2014. (Poaching figures in 2013 are skewed by the mass poisoning incident at Hwange National Park that killed 103 elephant, but if that number is "normalized" to 190, it is consistent with the decreasing trend.)[56] Likewise, the Proportion of Illegally Killed Elephants ("PIKE") at the Chewore and Nyami Nyami Monitoring the Illegal Killing of Elephants ("MIKE") sites in Zimbabwe has fallen: to 0.40 in 2013, 0.17 in 2014, and 0.29 in 2015 at Chewore, and from 0.81 in 2011 to 0.27, 0.22, 0.37, and 0.35 in the years 2012 to 2015 at Nyami Nyami. The most recent figures are well below the 0.5% threshold which signifies unsustainable poaching.[57] The decline in poaching undoubtedly stems from ZPWMA's enhanced anti-poaching, as described in the section above.

Recognizing both a mutual interest, and that collaboration will allow for a more efficient use of resources, ZPWMA and the hunting sector collaborate extensively in anti-poaching. Conservation Force submitted numerous specific evidence of this.[58] A few examples from this evidence are below:

- The Dande Anti-Poaching Unit ("DAPU") in the Zambezi Valley has catalyzed a significant decrease in poaching in their areas. In 2010, DAPU reported 40 elephant carcasses. In 2016, they observed seven. DAPU team members have grown so skilled in anti-poaching tactics they work alongside ZPWMA rangers in patrolling Mana Pools National Park. Charlton McCallum Safaris spent $95,006 on DAPU's anti-poaching activities in 2016, including salaries, rations, rewards, equipment, and

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[54] PAC offtakes have been between 44-52 elephant from 2013-2015, a negligible amount in a population over 82,000 elephant, and at or below 1.0% when added to poaching and hunting offtakes. ZPWMA issues few PAC permits, and instead relies on the benefits of the CAMPFIRE program and voluntary actions of hunting operators to minimize crop-raiding and losses to elephant, and thus minimize PAC. The CAMPFIRE Workshop demonstrated that this system is working, as PAC figures were typically low across the districts. *CAMPFIRE Workshop Proceedings*, p. 6-21; *see also CF June 2014 Comment*, p. 15-7 & related attachments; *CF Oct. 2014 Comment*, p. 26-33 & related attachments; *CF Dec. 2014 Comment*, p. 3-7 & related attachments; *CF Jan. 2015 Comment* & related attachments.

The uncited "anecdotal evidence" relied upon in the Finding is unreliable, and is another incorrect "fact" on which the negative finding was based that requires reconsideration.

[55] G. Wittmeyer et al., *Illegal Killing for Ivory Drives Global Decline in African Elephants*, Proceedings of the National Academy of Sciences (July 22, 2014).

[56] *ZPWMA July 2015 Response*, p. 43.

[57] *CF Oct. 2014 Comment*, p. 21-22 & related attachments; CF Email to T. Van Norman attaching updated MIKE/PIKE data (Mar. 11, 2015); *ZPWMA July 2015 Response*, p. 25; CITES/MIKE Database, publicly available at https://cites.org/eng/ prog/mike/data_and_reports.

[58] E.g., *CF June 2014 Comment*, p. 17-19 & related attachments (including SOAZ report); *CF Oct. 2014 Comment*, p. 22, 26-33 & related attachments; *CF Dec. 2014 Comment*, p. 3-7 & related attachments; *CF Jan. 2015 Comment* & related attachments; *Proceedings of the Mana Pools Anti-Poaching Workshop* (May 2015); CF Email to T. Van Norman forwarding reports of anti-poaching efforts in Zambezi Valley (Dec. 3, 2015); CF Email to T. Van Norman forwarding hunting operator anti-poaching efforts in Zambezi Valley (Jan. 5, 2016); CF Email to T. Van Norman forwarding DAPU film (May 9, 2016); CF Emails to T. Van Norman forwarding DAPU Reports (June 15, 2015, May 23, 2016, & Jan. 18, 2017).

vehicles. DAPU's expenditures in 2015 topped $80,000 and in 2014, they were over $72,000. This is an expanding program, and has contributed significantly to anti-poaching in the Zambezi Valley, including through the additional support of aerial surveillance. ***Mr. Jines' hunt took place in the Mbire District and with Charlton McCallum Safaris. Mr. Jines' hunting fees, including his trophy fee and voluntary contributions, are directly contributing to DAPU and the operators' extensive community investment***.

- The SOAZ Report identified almost $1 million spent on anti-poaching in 2013 by a small sample of 14 operators. These operators employed a total of 245 scouts on the ground, an average of 17-18 scouts per company.
- Lodzi Hunters collaborates with the Binga district council to restore wildlife in their concession, on which they have a long-term lease. They maintain a 12-member anti-poaching team that patrols the concession and the borders of Hwange National Park. Lodzi Hunters coordinates with ZPWMA to ensure full and efficient coverage. Lodzi Hunters' anti-poaching and incentives programs cost the company over $350,000 per year, in addition to their contractual payments to the CAMPFIRE district and wards. 95% of Lodzi Hunters' income comes from elephant hunting.

In short, the private-sector's contributions against poaching are extensive. They were not duly considered in the Denials, even though they are an essential component of Zimbabwe's elephant management.[59] For this reason, the Denials should be reconsidered, and will need to be reversed based on proper evaluation of the submitted data.

Reason for Reconsideration 6: Revenues Generated from Elephant Hunting in Zimbabwe are Reinvested in Elephant Conservation Efforts by ZPWMA and CAMPFIRE Communities

The information provided to the FWS documents that elephant hunting accounts for the largest percent of revenue generated by hunting across all four land categories (safari areas, communal land, private land, and forestry areas). In 2014, over $6.2 million in trophy fees was generated from elephant hunts, with $5 million of that revenue accruing to ZPWMA to reinvest in wildlife management and enforcement.[60] Over 50% of that revenue comes from U.S. hunters.[61] Put differently, "the African elephant is one of the biggest drawcard species from a hunting perspective and is at the centre of all the major hunts... Generally hunting contributed an average of USD22m to the country's GDP in 2014 and 2015..."[62]

A significant portion of ZPWMA's operating budget relies upon hunting income (although that proportion declined in 2015, as hunting income has decreased, largely due to the FWS' elephant suspension and non-issuance of lion import permits).[63] Most of this is attributable to elephant hunts. In turn, most of ZPWMA's operating funds are directed to ranger salaries, anti-poaching, and law enforcement—over $3.1 million in Safari Areas alone (and staff costs in Safari Areas are covered by hunting revenues). Put simply, most of the revenues coming in from elephant hunting are reinvested in and contribute to the protection and

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[59] *Plan*, p. 12 ("The Role of Sport Hunting in Elephant Conservation").

[60] *ZPWMA July 2015 Response*, p. 48.

[61] *ZPWMA July 2015 Response*, p. 41.

[62] ZPWMA, Presentation, *Legal Trade, Conservation, and Rural Livelihoods: A Zimbabwean Perspective* (Dec. 2016), p. 9-10.

[63] *ZPWMA Dec.* 2014 *Response*, p. 21.

recovery of elephant by being reinvested in law enforcement and anti-poaching.[64] The Denials' failure to consider the July 2015 Response and information about ZPWMA's revenue, budget, and expenditures requires reconsideration and reversal.

In communal areas, elephant hunting is the financial backbone of CAMPFIRE. CAMPFIRE is the mechanism whereby communities benefit from living with wildlife, and largely from living with elephant. The program has built tolerance within communities through creation of incentives, especially due to the funding of infrastructure projects that improve rural livelihoods across communities.[65] The Finding correctly admits that "CAMPFIRE plays a role in elephant management." More precisely, CAMPFIRE plays an ***essential*** role in elephant conservation by reducing conflicts between elephant and the communities who maintain elephant on their lands. Zimbabwe's Parks and Wildlife Act Chapter 20:14 empowered rural people living among wildlife to effectively benefit from it. CAMPFIRE is the mechanism created to facilitate this.

From 1989-2006, CAMPFIRE channeled more than $20 million to rural villages and $17 million to rural district councils.[66] From 2010-2015, hunting fees accounted for over $11 million in revenue, 70% of which came from elephant hunting (until the suspension reduced demand for elephant hunting), and two-thirds of which came from U.S. elephant hunters. Put differently, over $5 million accrued directly to CAMPFIRE communities from U.S. elephant hunters until the suspension reduced that amount, e.g., to 54% of hunts in 2014.[67] (Until then, 70% of CAMPFIRE revenue was generated by elephant hunts and $550,000 in trophy fees alone were generated in communal lands in 2014.[68]) These income receipts are "often understated," as economic multipliers "are not captured as part of CAMPFIRE income," and "[t]he proportion of safari operating expenses paid locally in the form of wages and salaries, and purchase of materials is often not recorded."[69]

According to the most recent audit of participating CAMPFIRE districts, "Data from 9 CAMPFIRE Districts ... shows that approximately 60% of the allocated quota is utilized and that the majority of hunters (53%) originate from America. These hunters have contributed US$9 million ... during the period 2010-2015 compared to US$8 million by the 40 other nations.... The income generated from trophy fees in the last 6

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[64] *ZPWMA July 2015 Response*, p. 36-41, 48-51; ZPWMA, Presentation, *Legal Trade, Conservation, and Rural Livelihoods: A Zimbabwean Perspective* (Dec. 2016), p. 9-10.

[65] E.g., *CAMPFIRE Association Report*, p. 1-11; *CAMPFIRE Workshop Proceedings*, p. 6-24; CF Email to T. Van Norman attaching *CAMPFIRE Income Analysis*; CAMPFIRE Association, *The Role of Trophy Hunting of Elephant in Support of the Zimbabwe CAMPFIRE Program* (Dec. 2016), p. 12-16 ("*CAMPFIRE—Role of Hunting Report*"), publicly available at http://campfirezimbabwe.org/index.php/downloads.

[66] *CAMPFIRE Association Report*, p. 8; *CAMPFIRE—Role of Hunting Report*, p. 9-11; ZPWMA, Presentation, *Legal Trade, Conservation, and Rural Livelihoods: A Zimbabwean Perspective* (Dec. 2016), p. 19, (U.S. hunters make up 76% of CAMPFIRE clients).

[67] *CAMPFIRE Association Report*, p. 3-4; *CAMPFIRE Income Analysis*, p. 1, 6 ("it is highly probable that the decline in hunting income for 2014 was largely caused by the suspension of trophy imports by United States of America. The suspension has a lag effect on income, and preliminary calculations of earnings for 2015 indicate a further continuing decline."); *CAMPFIRE—Role of Hunting Report*, p. 9-11.

[68] *ZPWMA July 2015 Response*, p. 48, 50; *see also CAMPFIRE Workshop Proceedings*, p. 6-24.

[69] ZPWMA, Presentation, *Legal Trade, Conservation, and Rural Livelihoods: A Zimbabwean Perspective* (Dec. 2016), p. 17; *see also* p. 11-20.

years (2010 – 2015) is approximately US$11.4 million of which elephant trophy fees contributed 65%."[70] In short, U.S. elephant hunters are the critical source of funds for CAMPFIRE communities.

Hunting funds are invested in projects that benefit the communities overall: building classrooms or clinics; purchasing farm equipment; rehabilitating water supplies; purchasing vehicles used in wildlife monitoring and anti-poaching; installing solar power; and many other infrastructure improvements. CAMPFIRE links these tangible benefits for rural residents to protection of wildlife. Its infrastructure creates conservation officers and monitoring programs, and employs game scouts, which generates significant benefits for the elephant as well. This is vital because otherwise elephant are largely viewed as threats, not assets.[71]

The grant of Appropriate Authority means that ZPWMA foregoes the fees from hunting in CAMPFIRE areas, and the fees and other benefits accrue to the communities. Operators in CAMPFIRE communities contract with the district councils, and are bound to pay trophy, concession, and other fees—or more, depending on their contracts—to the councils (41%) and to the wards directly (55%). Conservation Force submitted documentation evidencing that many operators contribute much more than just fees. For example, in the Mbire District in which Mr. Jines hunted, Charlton McCallum Safaris operates a "genuine joint venture" with the Mbire district council and wards. In 2013-2015, Charlton McCallum Safaris paid over $1.05 million in fees and revenue-sharing, including over $470,000 directly into ward accounts. The district significantly benefits from this partnership, including: constructing a clinic and nurses' houses; constructing a wildlife administration office; constructing storerooms; constructing 14 classroom blocks, seven teachers' houses, and one school office; constructing and equipping of grinding mills; and constructing and equipping two hand-pump boreholes, water pipes, toilets, water storage; constructing one tourist camp; acquiring two tractors.[72] 90% of the district's income comes from hunting and ~35% of that is from elephant hunting. 90% of hunting clients are U.S. citizens. In short, at least $330,750 accrued to the Mbire district and rural communities as a result of U.S. elephant hunters in 2013-2015.[73] This is but one example. Conservation Force has submitted evidence of many more, including contributions of Lodzi Hunters and Martin Pieters Safaris, among others.[74]

The Denials do not consider the best-available information. They rely upon the Finding, which cites to old and limited data on CAMPFIRE. The best-available information demonstrating CAMPFIRE's benefits must be evaluated, and accordingly, the Denials should be reconsidered and reversed.

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[70] *CAMPFIRE—Role of Hunting Report*, p. ii.

[71] *CAMPFIRE Association Report*, p. 3-4, 7-11; *CAMPFIRE Income Analysis*, p. 1-2; *CAMPFIRE—Role of Hunting Report*, p. 9-19; ZPWMA, Presentation, *Legal Trade, Conservation, and Rural Livelihoods: A Zimbabwean Perspective* (Dec. 2016), p. 20-22. *See also CAMPFIRE—Role of Hunting Report*, p. ii (in the period 2009-2015, "96 human lives were lost to wildlife attacks, with elephant accounting for more than half of those deaths. Yet despite these challenges, communities still retain a high level of tolerance for elephants, but this support is rapidly dissipating as a result of the loss of income from trophy hunting. This places almost two million ha of land at risk, including the risk of increasing retaliatory killing through poisoning and illegal wildlife crime.").

[72] Chief Sen. D. Chisunga, *Land Use Planning at the Local Level*, Presentation at the 14th African Wildlife Consultative Forum (Nov. 10, 2015).

[73] *CF Dec. 2014 Comment*, p. 3-7 (citing Charlton McCallum Safaris, Elephant Hunting in Mbire District – A Perspective of the Private Sector (Nov. 17, 2014) & related attachments.

[74] Please see attached Index of Information Submitted.

Reason for Reconsideration 7:
Local Conservation Efforts Effectively Share the Responsibilities of Elephant Conservation

The Denials should be reconsidered because Conservation Force, ZPWMA, SOAZ, and others have provided extensive documentation of the benefits to elephant generated by "local conservation efforts." The FWS does not discuss this information specifically, but it should. This information proves that the contributions of safari operators, anti-poaching units, CAMPFIRE communities, private landholders/conservancies, and associated non-profits are integral to the functioning of Zimbabwe's wildlife management system. They are not "limited" efforts. They are extensive, and reduce the burden on ZPWMA's resources.

As Conservation Force and ZPWMA previously explained, conservation work is ***frequently*** carried out by non-governmental entities in Zimbabwe.[75] The Parks and Wildlife Act Chapter 20:14 devolved Appropriate Authority to private and communal landholders. Through this "government mechanism," the "legal right to utilize and manage wildlife on their property" was transferred to the landholders.[76] Due to this transfer, non-governmental entities such as safari operators, CAMPFIRE district councils, and private conservancies have both the authority and the obligation to protect, conserve, monitor, and benefit from wildlife in their areas.[77] As ZPWMA wrote:

> Fundamentally, ZimParks supports local efforts by providing a conducive legislative and policy environment which allows the private and community sectors to thrive. The grant of Appropriate Authority Status to private properties and Rural District councils is a case in point.[78]

ZPWMA supports local conservation efforts through training, support, and more.

The contributions of non-governmental interest to wildlife conservation are not limited or localized. Taken together, they cover the country.[79] A few examples from the information provided to the FWS are below:

- Lodzi Hunters, in the Northwest Matabeleland and Sebungwe ranges, contributed over $680,000 over two years to CAMPFIRE wards, to improve livelihoods, employ scouts, and increase tolerance of elephant and other species. The operator also maintains a twelve-person anti-poaching team.[80] Similarly, Charlton McCallum Safaris in the Zambezi Valley shares revenues with Mbire CAMPFIRE wards and the district council. In two years, the fees shared topped $750,000 (of which $380,000+

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[75] *ZPWMA April 2014 Response*, p. 15-16, 23-25; *CF Oct. 2014 Comment*, p. 28 & related attachments; *see also* R. Martin, *Personal Comment: Ban on the Import of Elephant Trophies into the USA from Tanzania and Zimbabwe* (Oct. 2014), p. 6 & attachment, M. Murphree & R. Martin, *Shifting Paradigms, Policy and Processes in Conservation and Development over the Past Four Decades* (2013).

[76] *ZPWMA April 2014 Response*, p. 15-16.

[77] *ZPWMA Dec. 2014 Response*, p. 18-21 ("This arrangement [Appropriate Authority] incentivizes landowners and tenants to not only tolerate wildlife, but to conserve and promote conservation and protection of wildlife..."), p. 25-27 (identifying contributions of safari operators, NGOs, conservancies, communal areas to wildlife conservation).

[78] *ZPWMA April 2014 Response*, p. 25.

[79] Please see attached map, which shows the breadth of these "local" operations.

[80] *CF Jan. 2015 Comment* & related attachments.

went directly to ward accounts) and anti-poaching expenditures topped $150,000.[81] Each of these operators is lessening the government's burden of community support and anti-poaching patrols by committing their private resources to these purposes.

- A small operator, Pro Safaris in the Zambezi Valley, allocates 6% of its turnover for water pumping, water pan installation, and other conservation activities. Pro Safaris maintains a ten-person anti-poaching team to patrol a 40-km international border,[82] which allows ZPWMA rangers to focus on patrolling the national park instead of the Safari Area.
- The Tashinga Initiative is a non-profit in the Zambezi Valley that obtains anti-poaching equipment, coordinates anti-poaching efforts, and organized the Sebungwe elephant management planning workshop. The Tashinga Initiative is supported by local safari operators (hunting and photo), and international donors like the Houston Safari Club.[83]
- Also in the Zambezi Valley/Sebungwe range, Martin Pieters Safaris maintains three patrol teams, and are helping develop a community-owned conservancy with two additional patrol teams. The company teams have recovered 15,000+ snares since 2007, and their nearly 300 patrols support ZPWMA's monitoring in this area. The community scouts were intensively trained by the operator teams. These scouts cooperate with ZPWMA against poaching in the Omay and Gokwe communal lands.[84]
- Save and Bubye Valley Conservancies in the Southeast Lowveld range each spend over $500,000 annually on anti-poaching and invest another $200,000+ in nearby villages. The conservancies do not draw on ZPWMA resources at all. They are wholly responsible (and largely depend on hunting income) to secure a land area about the size of New Jersey, the world's third-largest black rhino population, and an elephant population that exceeds 2,000.[85]
- CAMPFIRE communities monitor poaching losses and PAC off-take. They collaborate with ZPWMA to detect poaching and have developed a mutual informer network together. They also work with ZPWMA and safari operators to avoid problem animal off-takes and non-destructively deter crop-raiding elephant.[86] Because they have Appropriate Authority, they collaborate with ZPWMA, but do not need to depend on ZPWMA for wildlife management.
- The SOAZ report included data from 14 operators across the entire elephant range. It reported on these operators' monitoring of elephant populations and poaching losses and their anti-

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[81] *CF Dec. 2014 Comment*, p. 5-6 & related attachments; *CF Jan. 2015 Comment* & related attachments; CF Email to T. Van Norman forwarding DAPU film (May 9, 2016); CF Emails to T. Van Norman forwarding DAPU Reports (June 15, 2015, May 23, 2016, & Jan. 18, 2017).

[82] *Pro Safaris Report* (2016).

[83] E.g., CF Email to T. Van Norman forwarding information on anti-poaching in the Zambezi Valley and Sebungwe (Nov. 30, 2015); CF Email to T. Van Norman forwarding Tashinga Initiative press release (May 22, 2016); CF Email to T. Van Norman forwarding article on success in building new communications base (Nov. 14, 2016).

[84] Martin Pieters Safaris, *Blog Posts*, publicly available at http://www.martinpieterssafaris.com/blog/.

[85] B. du Preez et al., *Sport-Hunting and Lion (Panthera leo) Conservation in Zimbabwe* (Jan. 31, 2016); B. du Preez, *Bubye Valley Conservancy Lion Research Report* (Jan. 12, 2016); R. Groom, *Hunting in Zimbabwe's Save Valley Conservancy* (Jan. 27, 2013).

[86] *See generally CAMPFIRE Workshop Proceedings.*

poaching investment of almost $1 million in 2013. The 14 companies together employed 245 anti-poaching personnel, and cooperated closely with ZPWMA.[87]

The Finding highlights the Mana Pools elephant management planning workshop. It should also mention the Sebungwe and South East Lowveld workshops. They exemplify the public-private-communal partnership existing in Zimbabwe because stakeholders have Appropriate Authority. The Finding reveals the FWS' misunderstanding of Zimbabwe's conservation system, which requires reconsideration and reversal of the Denials.[88]

Reason for Reconsideration 8: Enhancement has been Shown

The FWS has defined "enhancement" as benefits to the species, such as protection of habitat, generation of conservation and anti-poaching funding, and reduction of human-wildlife conflicts through generation of conservation incentives. The information submitted to the FWS demonstrates that licensed, regulated hunting of elephant in Zimbabwe satisfies this standard. This information shows how hunting justifies the existence of significant elephant range.[89] It substantiates the anti-poaching partnership among ZPWMA, hunting operators, and communities, and demonstrates the success of their efforts (declining PIKE). It shows that communities are incentivized not to retaliate against elephant (low PAC offtakes). It describes the pre-suspension benefits generated for CAMPFIRE communities. The success of Zimbabwe's elephant management is underscored by the fact there are over 80,000 elephants in the country, and significant anti-poaching gains in the border area of the Zambezi Valley.

The FWS demands "enhancement." It has been shown. Sustainable offtakes have been shown. A stable elephant population has been shown. A well-managed and responsive elephant management system has been proven. The continued suspension obstructs this enhancement from reaching the elephant—and the people—of Zimbabwe. We encourage the FWS to stop moving the target. The FWS cannot continue to rely upon a Finding that ignores the facts.

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[87] *SOAZ Report*, p. 4.

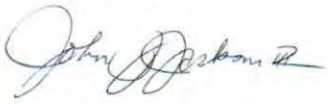
[88] The Finding's first sentence is almost verbatim to the July finding, and still fails to respond to CF's objections on this point. We objected that we did not "emphasize the economic impact of the suspension to local conservation efforts," though that information was available in our submissions. The Finding's failure to respond to this objection, and its cutting-and-pasting of prior writing, merits reconsideration; it clearly does not consider the best-available and most current information. Note that the attachments in CF's comment also pointed to data showing "whether and to what extent these individuals would reduce their conservation efforts based on the inability of U.S. hunters to import a sport-hunted trophy," e.g., in the submitted Declarations, Charlton McCallum Safaris and DAPU documents, SOAZ Report, CAMPFIRE Reports, R. Martin Fourth Report, and more. E.g., *CF June 2014 Comment* Attachments; *CF Oct. 2014 Comment* Attachments.

[89] It should be noted that there is far more land secured in areas which allow, and largely rely upon, sustainable use. Compare the approximately 27,000 km^2 of habitat in national parks to the approximately 19,000 km^2 in Safari Areas, ~48,000 km^2 in CAMPFIRE areas, and 7,000+ km^2 in conservancies.

IUCN/UN, Protected Planet, http://blog.protectedplanet.net.

Given all this information, the Applicants request reconsideration, and reversal of the Denials.

Respectfully submitted,



Conservation Force
3240 S. I-10 Service Road W., Suite 200
Metairie, Louisiana 70001-6911
Phone: 504-837-1233
Fax: 504-837-1145
Email: cf@conservationforce.org

CC: Bryan Arroyo
Dr. Rosemarie Gnam

Attachments: Index
USB containing information submitted to the FWS by Conservation Force and ZPWMA
Map of "Local Conservation Efforts"

Index of Information Produced by Conservation Force, ZPWMA, and AfESG
In Support of Re-Opening Import of Sport-Hunted Elephant Trophies from Zimbabwe

Date	Producer	Document
7/2/1997	FWS	Positive enhancement finding
4/4/2014	FWS	First questionnaire to ZPWMA
4/4/2014	FWS	Negative enhancement finding
4/17/2014	FWS	Negative enhancement finding revised
4/17/2014	ZPWMA	Response to April 4, 2014 questionnaire sent to FWS, including all attachments ("ZPWMA April 2014 Response")
5/30/2014	AfESG	Email from H. Dublin to R. Gabel, subject "Clarification regarding Zimbabwe data"
6/6/2014	CF	First comment on April 2014 enhancement finding and publication in the Federal Register, including all attachments ("CF June 2014 Comment")
6/25/2014	CF	Email to T. Van Norman forwarding email from E. Chidziya/ZPWMA regarding National Elephant Management Plan Workshop
7/22/2014	FWS	Negative enhancement finding
10/4/2014	R. Martin	Personal comment and attachments sent to FWS
10/21/2014	CF	First comment on July 2014 enhancement finding, including all attachments ("CF Oct. 2014 Comment")
10/31/2014	FWS	Second questionnaire to ZPWMA
11/3/2014	AfESG	Email from H. Dublin to T. Van Norman attaching AfESG letter/ comment on July finding ("AfESG Nov. 2014 Letter")
11/13/2014	CF	Email to T. Van Norman forwarding invitation to National Elephant Management Plan Workshop
12/1/2014	CF	Email to T. Van Norman forwarding Agenda for Plan Workshop
12/5/2014	CF	Email to T. Van Norman attaching PowerPoint with survey results
12/5/2014	CF	Email to T. Van Norman summarizing outcomes of Plan Workshop
12/10/2014	ZPWMA	Response to October 31, 2014 questionnaire sent to FWS, including all attachments ("ZPWMA Dec. 2014 Response")
12/15/2014	CF	Second comment on July 2014 enhancement finding, including all attachments ("CF Dec. 2014 Comment")
12/16/2014	CF	Email to T. Van Norman forwarding CAMPFIRE Workshop proceedings
12/23/2014	CF	Email to T. Van Norman forwarding national Plan Workshop Proceedings
1/6/2015	CF	Email to T. Van Norman forwarding comments from the authors of the Save Valley Conservancy 2013 survey
1/12/2015	CF	Email to T. Van Norman forwarding invitation to Mana Pools Elephant Management Plan Workshop
1/19/2015	CF	Third comment on July 2014 enhancement finding, attaching Lodzi Hunters and Charlton McCallum Safari documents to substantiate enhancement/community investment ("CF. Jan. 2015 Comment")
1/23/2015	CF	Email to T. Van Norman with comment cover letter
3/3/2015	CF	Email to T. Van Norman forwarding article on ZPWMA anti-poaching success
3/11/2015	CF	Email to T. Van Norman attaching recent CITES/MIKE update

Index of Information Produced by Conservation Force, ZPWMA, and AfESG
In Support of Re-Opening Import of Sport-Hunted Elephant Trophies from Zimbabwe

Date	Producer	Document
3/11/2015	CF	Email to T. Van Norman forwarding invitation to rescheduled Mana Pools Elephant Management Plan Workshop
3/26/2015	FWS	Negative enhancement finding ("Finding")
4/13/2015	CF	Email to T. Van Norman forwarding article regarding effect of FWS suspension on CAMPFIRE
5/4/2015	CF	Email to T. Van Norman forwarding invitation to Sebungwe Elephant Management Plan Workshop
5/4/2015	CF	Email to T. Van Norman forwarding preparatory document for Sebungwe Workshop
5/5/2015	CF	Email to T. Van Norman forwarding study on elephant in the Sebungwe range
5/5/2015	CF	Email to T. Van Norman forwarding Mana Pools Workshop Proceedings
5/8/2015	CF	Email to T. Van Norman forwarding agenda for Sebungwe Workshop
5/11/2015	CF	Email to T. Van Norman forwarding background document on elephant populations in the Sebungwe range
5/12/2015	FWS	Third questionnaire to ZPWMA
5/14/2015	CF	Email to T. Van Norman forwarding fact sheet on Sebungwe Workshop
6/15/2015	CF	Email to T. Van Norman forwarding DAPU First-Quarter Report
7/20/2015	ZPWMA	Response to May 12, 2015 questionnaire sent to FWS, including all attachments ("ZPWMA June 2015 Response")
9/30/2015	CF	Email to T. Van Norman forwarding South East Lowveld Workshop Proceedings
11/30/2015	CF	Email to T. Van Norman forwarding A. Pole/AWF email describing Cabinet subcommittee meeting
11/30/2015	CF	Email to T. Van Norman forwarding email from L. Taylor regarding anti-poaching efforts in Sebungwe range (confidential)
12/1/2015	CF	Email to T. Van Norman forwarding analysis of income to CAMPFIRE districts from licensed, regulated hunting ("CAMPFIRE Income Analysis")
12/3/2015	CF	Email to T. Van Norman forwarding anti-poaching reports in the Mana Pools National Park area
12/7/2015	CF	Email to T. Van Norman attaching two presentations, one made by the CAMPFIRE Association and one made by Chief Chisunga of the Masoka Ward in the Mbire District
1/5/2016	CF	Email to T. Van Norman forwarding information about anti-poaching in the Zambezi Valley (confidential)
2/22/2016	CF	Email to T. Van Norman attaching article regarding ZPWMA ant-poaching success
2/24/2016	CF	Email to T. Van Norman including link to video regarding Bubye Valley Conservancy
2/29/2016	CF	Email to T. Van Norman forwarding final print of National Elephant Management Plan ("Plan")

Index of Information Produced by Conservation Force, ZPWMA, and AfESG
In Support of Re-Opening Import of Sport-Hunted Elephant Trophies from Zimbabwe

Date	Producer	Document
4/20/2016	CF	M. Pieters Blog Posts
4/20/2016	CF	Pro Safaris Report
4/20/2016	CF	B. du Preez, Bubye Valley Conservancy Lion Research Report
4/20/2016	CF	R. Groom, Hunting in Zimbabwe's Save Valley Conservancy
4/20/2016	CF	B. du Preez et al., Sport-Hunting and Lion (*Panthera leo*) Conservation in Zimbabwe
4/25/2016	CF	Email to T. Van Norman attaching article "Muchinguri speaks on Tsholotsho Jumbo ban"
5/2/2016	CF	Email to T. Van Norman attaching article on continued losses in Zimbabwe's hunting sector due to the FWS suspension
5/9/2016	CF	Email to T. Van Norman including link to video describing Charlton McCallum Safaris/DAPU's anti-poaching successes
5/9/2016	ZPWMA	Email to T. Van Norman attaching letter explaining use of elephant hunting funds
5/22/2016	CF	Email to T. Van Norman attaching press release for Houston Safari Club grant to the Tashinga Initiative
5/23/2016	CF	Email to T. Van Norman forwarding DAPU's First Quarter Report
7/18/2016	CF	Email to T. Van Norman forwarding email from D. Cumming confirming "go-ahead" to prepare Supplemental Plan
7/19/2016	CF	Email to T. Van Norman forwarding Mana Pools MIKES site information
9/19/2016	CF	Email to T. Van Norman forwarding article about CAMPFIRE review
9/2016	AfESG	AfESG African Elephant Status Report 2016
11/9/2016	ZPWMA	Email to T. Van Norman attaching requested Plan prioritization and Supplemental Plan
11/14/2016	CF	Email to T. Van Norman forwarding article describing anti-poaching efforts by the Tashinga Initiative in the Zambezi Valley
12/27/2016	CF	Email to T. Van Norman forwarding presentation by ZPWMA Elephant Coordinator
1/18/2017	CF	Email to T. Van Norman forwarding DAPU End-of-Year Report
2/1/2017	CF	Email forwarding anti-poaching report reflecting implementation of the Mana Pools/Zambezi Valley regional elephant management plan
3/6/2017	CF	Email forwarding status of Zimbabwe responses to FWS requests
4/6/2017	CF	CAMPFIRE Association, The Role of Trophy Hunting of Elephant in Support of the Zimbabwe CAMPFIRE Program
4/6/2017	CF	CITES/MIKE, Levels and Trends of Illegal Killing of Elephants in Africa to 31 December 2016

Note: This list is not and is not intended to be a complete record of the FWS' Zimbabwe elephant file. The FWS undoubtedly received information not listed here, including at least two information productions by Safari Club International. We believe that the FWS has received direct communications from applicants for import permits, safari hunting operators, ZPWMA, and others.

Subject: Fwd: Update from MAPP
From: "John J. Jackson, III" <jjw-no2@att.net>
Date: 1/5/2016 9:45 AM
To: Tim Vannorman <Tim_Vannorman@fws.gov>, Bryan Arroyo - FWS <bryan_arroyo@fws.gov>, Dan Ashe <dan_ashe@fws.gov>, Rosemarie Gnam <Rosemarie_Gnam@fws.gov>, "Craig_Hoover@fws.gov" <Craig_Hoover@fws.gov>

FYI

-------- Forwarded Message --------
Subject: Update from MAPP
Date: Tue, 5 Jan 2016 14:22:57 +0200
From: Lynne Taylor (b) (6)
To: John J. Jackson III <jjw-no2@att.net>, John J. Jackson, <cf@conservationforce.org>
CC: Marco Pani (b) (6), Regina Lennox <regina.lennox@conservationforce.org>

Dear John,

MAPP have recently been asking Zambezi Elephant Fund for support to fund Enock Muziringa, ex Prosecutor from Kariba who has taken on the work of collation of all the results from the action in the field. This is it.

This is for one month only, and a very fine start.

I have by email advised Kevin Higgins that USD500.00 is available to the key informant which led to the arrest of the ivory poacher from Conservation Force.

This is a very good start to 2016.

I do not know to whom Kevin has sent this onto at Parks and will leave that to him to conclude.

Best wishes
Lynne

Attachments:

MAPP MONTLY RETURNS FOR DECEMBER.docx	19.7 KB
Attached Message Part	615 bytes
tti4.gif	10.6 KB
Attached Message Part	6 bytes

Subject: Fwd: Fwd: Mission to Zimbabwe (Elephant ban)
From: "John J. Jackson, III" <jjw-no2@att.net>
Date: 1/6/2015 8:22 AM
To: undisclosed-recipients:;
BCC: John Thodos [redacted], bill brewster <bbrewster@caphillgrp.com>, Ralph Cunningham [redacted], Mike Branham [redacted] Lori Clem <Lori@toothacres.com>, Alan Sackman <a.sackman@sackman.com>, James Mitchell [redacted], Wes Bates <wcbates@steemer.com>, Shane Mahoney <conservationvisions@gmail.com>, Chrissie Jackson <cjackson@conservationforce.org>, Don Lindsay <railwood@iafrica.com>, Bert Klineburge[redacted] Dale Toweill [redacted] "Damm, Gerhard" <gerhard@muskwa.co.za>, Philippe Chardonnet <p.chardonnet@fondation-igf.fr>, Regina Lennox <regina.lennox@conservationforce.org>, Marco Pani [redacted], Tim Vannorman <Tim_Vannorman@fws.gov>, Bryan Arroyo - FWS <bryan_arroyo@fws.gov>, Dan Ashe <dan_ashe@fws.gov>, Rosemarie Gnam <Rosemarie_Gnam@fws.gov>

FYI

-------- Forwarded Message --------
Subject: Fwd: Mission to Zimbabwe (Elephant ban)
Date: Sun, 4 Jan 2015 15:09:45 +0200
From: Alistair Pole [redacted]
To: John J. Jackson, <jjw-no2@att.net>, John J. Jackson, III <cf@conservationforce.org>

Hi John,

Happy New Year to you. Any news from Fish and Wildlife on the Zim ban. I will go to Parks and tomorrow and try and find out if they replied to Fish & Wildlife questions.

Probably a bit late but below is response from Dusty Joubert who did all the SVC Aerial surveys on double counting.

On another note, we have secured all the funding for the Mana Pools anti poaching workshop so this will go ahead as planned end of January. I haven't heard anything more from Richard on the Sebungwe one, is this still all on track.

Very best

Alistair

Begin forwarded message:

From: "Dusty Joubert" <selatibig5@telkomsa.net>
To: "'Sango HQ'" <sangohq@sango-wildlife.com>
Cc: "'Alistair Pole \(June 07\)'" (b) (6) [redacted]
Subject: RE: Fwd: Mission to Zimbabwe (Elephant ban)
Date: 03 January 2015 at 9:03:51 AM CAT

Morning Dave

Please find below my response to Conservation Force.

- Potential double counting – Any aerial survey to an extent a chance of over- or under counting. These over/under counts are potentially caused by time delays resulting from large area sizes needing consecutive days or refuelling and long transect lines whilst the survey is conducted. Whilst animal movement for the latter is easily recognised and accounted for it is not the case for animals moving across transect lines from one day to the next. Because of this effect and especially for clumped species it is important to count as often as possible. In the case of the SVC it was attempted to count once a year. A trend is established over time rather than exact numbers, although the attempt is to be as accurate as possible. The trend is used to establish population health status whilst a most accurate figure is necessary for management purposes. The mentioning of potential double counting on Senuko was as a result of one or two herds (not in excess of 50 animals) that was observed as potentially crossing the next transect whilst the survey was conducted. The mentioning of potential double counting in the report was merely a comment for interpreting results gathered from future surveys and should not be seen as a definite.
- Growth rates – If one considers the past two survey results the population grew at 9.5% in one year. Natural or large elephant populations can breed up to 8%. The survey results suggest thus that there has either been an influx of animals from one survey to the next or there has been some double counting or a bit of both. The fact is we will never know. What we do know is that the population in its entirety is increasing and in a healthy state. Whether it is 1.6% over 12 years or 8.1% since 2010 etc. is not relevant. A good argument in your favour would be the 8.1% since 2010 as it was after the culling. A population response indicating growth when pressured. I would bring Rowan Martin's assessment into this argument and indicate the projections for culling 60 and then scale down to 30. As the aerial survey results complement his predictions very well.
- Culling – Graham Connear will be able to supply all the details. If I may ask that these are also passed onto me as I have an elephant issue down here that I would like to address as well.

Apologies for the long delay but sure the arguments are going to take some time. I fear that the decision to ban elephant hunting is a political one. So good luck having any rationale. Hope all is well in Zimbabwe, you all had a great Christmas and may your 2015 be blessed with goodwill.

Regards Dusty

From: Sango HQ [mailto:sangohq@sango-wildlife.com]

Sent: 21 September 2014 06:55 PM
To: Dusty Joubert
Cc: Wilfried Pabst; Alistair Pole (June 07)
Subject: Re: Fwd: Mission to Zimbabwe (Elephant ban)

Hi Dusty,

Yes please if you could still comment, we are in for a long fight on this one.

I will use your new address from now on. Hope all is well with you and the family.

Regards
David

On 2014/09/21 6:45 PM, Dust Joubert wrote:

> Thanks Dave. I have changed e-mail adress an rarely use this mail. I will go through these and comment if it is still relevant. My new e-mail is (b) (6) Regards Dusty
>
> On Tue, Sep 2, 2014 at 5:58 PM, Sango HQ <sangohq@sango-wildlife.com> wrote:
>
> Hi Dusty,
>
> This is the set of documents Willy is asking for your comment on.
>
> Regards
> David
>
> -------- Forwarded Message --------
> **Subject:** Fwd: Mission to Zimbabwe
> **Date:** Tue, 26 Aug 2014 22:21:54 +0300
> **From:** Wilfried Pabst <wp@pabstholding.co.za>
> **To:** Joubert . Sango Dusty (b) (6) , Sango HQ . <sangohq@sango-wildlife.com>
> **CC:** Zambezi Hunters, Dr Alistair Pole . (b) (6) Jackson, John . <jjj@conservationforce.org>
>
> Dusty, David, good evening,
>
> Just stopped on my overnight back to Joburg.
>
> Can you assist drafting a response as required by John and let me know how long that wound take?
>
> Tks much
>
> Willy
>
> Sent from my iPhone

Begin forwarded message:

From: "John J. Jackson, III" <cf@conservationforce.org>
Date: 26 August 2014 at 21:53:56 GMT+3
To: Wilfried Pabst <wp@pabstholding.co.za>
Subject: Re: Mission to Zimbabwe

Willy,
We could use your assistance in responding to the FWS' negative enhancement finding, which upholds the suspension of elephant trophy imports from Zimbabwe. In addressing updated population surveys provided by ZimParks and Conservation Force, the enhancement finding criticizes in part the 2013 Save Valley aerial survey. Attached is an excerpt from the enhancement finding related to Save Valley. My staff reviewed the 2013 aerial survey and made a few recommendations about a possible response. If you would prepare a brief response to the FWS' criticism, or perhaps ask the survey's authors to prepare a brief response, it could help strengthen the upcoming comment we will be filing with the FWS.
Copies of the July 22, 2014 enhancement finding and the 2013 Save Valley Conservancy survey are attached for ease of reference.
Thanks for your support,
John

--
John J. Jackson, III
CONSERVATION FORCE
3240 S. I-10 Service Road W., Suite 200
Metairie, Louisiana 70001
Tel: (504) 837-1233
Fax: (504) 837-1145
jjw-no@att.net
www.conservationforce.org

On 8/26/2014 11:09 AM, Wilfried Pabst wrote:

> Understood, tks John,
>
> Any hope to have ban lifted still this year? Doesn't look like it from here,
>
> Best
>
> Willy
>
> Sent from my iPhone
>
> On 26 Aug 2014, at 17:49, "John J. Jackson, III" <cf@conservationforce.org> wrote:
>
> > Willy,
> >
> > I do not think so. We have proven our case in the SAVE. That is not disputed.

Best,
John

--
John J. Jackson, III
CONSERVATION FORCE
3240 S. I-10 Service Road W., Suite 200
Metairie, Louisiana 70001
Tel: (504) 837-1233
Fax: (504) 837-1145
jjw-no@att.net
www.conservationforce.org

On 8/26/2014 9:33 AM, Willy Pabst wrote:

> tks John,
>
> should they include the Save Valley Conservancy? If so how do we suggest?
>
> We can certainly put them up and take them around,
>
> tks
>
> Willy
>
> Wilfried Pabst
> Cape Town: +27 21 761 5716
> South African Mobile: +27 82 461 6001
> Zimbabwe mobile: +263 775 297 072
> German Mobile: +49 172 251 1332
> Hamburg office: +49 40 536 2886
> Hamburg office fax: +49 40 536 7702
> e-mail: wp@pabstholding.co.za
>
> **August 4 - 19 in South Africa, August 20 - August 26 in Germany, August 27 - 30 in Zimbabwe, August 31 - September 6 in south Africa, September 7 - 11 in Australia, September 12 onwards back in South Africa.**
>
> On 26 Aug 2014, at 16:22, John J. Jackson, III <cf@conservationforce.org> wrote:
>
> FYI

-------- Original Message --------
Subject: Re: Mission to Zimbabwe
Date: Tue, 26 Aug 2014 11:06:50 +0200
From: Marco Pani (b) (6)
To: CAMPFIRE - Charles Jonga <email@campfirezimbabwe.org>
CC: (b) (6) Edson CHIDZIYA <wsithole@zimparks.co.zw>, Olivia Mufute <omufute@zimparks.co.zw>, Olivia Mufute (b) (6), John J. Jackson, III <cf@conservationforce.org>, Rowan Martin (b) (6), David Cumming (b) (6), Regina Lennox <regina.lennox@conservationforce.org>, Stephanie Coulter <stephanie.coulter@conservationforce.org>, Michael Murphree (b) (6)

Dear Charles,

I am ready to help to draft a CAMPFIRE supplement response to the July USFWS Final Enhancement determination, in conjunction with PWMA, as I am assisting Conservation Force on this issue.

I will be in Harare from 1st September and the full first week will be dedicated to the USFWS issue. Conservation Force have already done throughout analysis of the USFWS document.

Also I am ready to assist you in the preparation of a CAMPFIRE Elephant workshop to be held before the planned National Workshop on Elephant Management Plan, organized by PWMA with the financial assistance of Conservation Force and other sponsors

The second part of my mission includes a 3 day (6 to 8) field trip to a representative Elephant and Communities area, and I am wondering if you can assist in the preparation of the field trip, where we could have a good opportunity to draft and plan the above. In this way we can optimize time.

Best wishes

Il giorno 25/ago/2014, alle ore 17:25, John J. Jackson, III <cf@conservationforce.org> ha scritto:

Marco,

Make sure to meet with Charles Jonga of CAMPFIRE and offer to help him submit a Supplement ASAP to the July Final Enhancement Determination and, second, see what if anything he may suggest to better represent CAMPFIRE's interest. What does he think about holding a CAMPFIRE Workshop of some sort before the December (now first week of December) Elephant Workshop? If it is a good strategy we may be able to fund it. Tentatively, CAMPFIRE will have two representatives at the Elephant Workshop but he may see value in holding their own meeting beforehand since the suspension of imports directly reduces their single largest source of revenue - elephant hunting. Their interest in elephant hunting is too important to neglect! My legal staff will be getting an email to him within a few days about a CAMPFIRE Supplement to the FWS questions to Zimbabwe that were CAMPFIRE-related and the FWS July Final Enhancement Finding that included FWS's response to CAMPFIRE's own document.

Best,
John

--
John J. Jackson, III
CONSERVATION FORCE
3240 S. I-10 Service Road W., Suite 200
Metairie, Louisiana 70001
Tel: (504) 837-1233
Fax: (504) 837-1145
jjw-no@att.net
www.conservationforce.org

--
C.J. Joubert
General Manager,
Selati Game Reserve, Gravelotte
South Africa

(+27) 072 989 5076

avast This email is free from viruses and malware because avast! Antivirus protection is active.

Subject: Re: Mana Pools National Park Workshop
From: "John J. Jackson, III" <cf@conservationforce.org>
Date: 1/12/2015 9:06 AM
To: undisclosed-recipients:;
BCC: Tim Vannorman <Tim_Vannorman@fws.gov>, Bryan Arroyo - FWS <bryan_arroyo@fws.gov>, Dan Ashe <dan_ashe@fws.gov>, Rosemarie Gnam <Rosemarie_Gnam@fws.gov>, John Thodos <johnthodos@gmail.com>, bill brewster <bbrewster@caphillgrp.com>, Ralph Cunningham <ralphscunn@aol.com>, Mike Branham <mwbranham@gmail.com>, Lori Clem <Lori@toothacres.com>, Alan Sackman <a.sackman@sackman.com>, James Mitchell <jamesfrancis7277@aol.com>, Wes Bates <wcbates@steemer.com>, Shane Mahoney <conservationvisions@gmail.com>, Chrissie Jackson <cjackson@conservationforce.org>, Don Lindsay <railwood@iafrica.com>, Bert Klineburger <bklineburger@gmail.com>, Dale Toweill <dtoweill@gmail.com>, "Damm, Gerhard" <gerhard@muskwa.co.za>, Philippe Chardonnet <p.chardonnet@fondation-igf.fr>

FYI

From: Geoffreys Matipano [mailto:gmatipano@zimparks.co.zw]
Sent: 11 January 2015 18:01
To: john@johnstevenssafaris.com; (b) (6) lynne@thetashingainitiative.org; (b) (6) clive@carguard.co.zw; (b) (6) humphrey@tailormade-safaris.com; tesscat@mweb.co.zw; (b) (6) ; jjw-no2@att.net; (b) (6) graham@hhksafaris.com; zimwild@mweb.co.zw; (b) (6) alida@yoafrica.com; lisa@tikkihywoodtrust.co.zw; (b) (6) carl@chirundusafarilodge.com; Alistair Pole; t.chipere@afri-hype.com; tom.milliken@traffic.org
Subject: invitation

Dear Stakeholders

You are being invited to a workshop on antipoaching strategies for Mana Pools National Park to be held at Spurwing from 26 to 29 Janaury 2015 inclusive of travelling days. See attachments.

STEERING COMMITTEE

John and Nicci of John Stevens Safaris

Russell Taylor- WWF Namibia

Lynne Taylor – The Tashinga Initiative

Richard Maasdorp- Zambezi Society

Clive Jones- Kavinga Safaris

Diane Skinner- Consultant

LOWER ZAMBEZI TOUR OPERATORS ASSOCIATION- three representatives- Humprey Gumpo, Dave McFarlane, Andy Smith

Marco Pani-Conservation task Force

Rod Huck- Kavinga Safaris

Graham Hingeston- HHK safaris

Willie Nduku- WEZ

Franscesco Marconati-Vine Camp

Jan Stander- Hurungwe RDC

Lisa Hywood- Tikki Hywood

Carl van der Riet- Chirundu Croco Farm

Jurgen Wickie- WEZ –Makonde Branch

Alistar Pole-AWF

Nyakasanga Lease Holder representative-

Tom Miliken -TRAFFIC

For further information please contact G. Matipano and Mrs Lynne Taylor of The

Tashinga Initiative.

With Regards

Mr. Geoffreys Matipano

Head Management Services

Cnr Borrowdale Rd/Sandringham Drive

P.O Box CY 140, Causeway, Harare, Zimbabwe

Telephone: +263-4-7077624-7

Direct line : +263-4-792782

Cell : +263 912 116 389

If this email is spam, report it to www.OnlyMyEmail.com

Subject: Enhancement information for lion and elephant permit applications -- DAPU Report
From: "Regina A. Lennox" <regina.lennox@conservationforce.org>
Date: 1/18/2017 10:04 AM
To: "Vannorman, Tim" <tim_vannorman@fws.gov>
CC: Bryan Arroyo <bryan_arroyo@fws.gov>, "Vargas, Darcy" <darcy_vargas@fws.gov>, "John J. Jackson, III" <cf@conservationforce.org>

Dear Tim,

Please see the attached Dande Anti-Poaching Unit (DAPU) end of year report. Please consider this information in making an enhancement finding for the import of elephant and lion trophies from Zimbabwe, including but not limited to the permit applications PRT 86473B, 86471B, etc. (lion), submitted on January 26 of last year; the permit applications PRT 94868B, 94870B, etc. (lion), submitted on April 20 of last year; and the permit applications PRT 03369C, 03902C, etc. (elephant), submitted in August of last year.

As the attached report demonstrates, all wildlife populations have increased in this area due to the committed anti-poaching efforts of Charlton McCallum Safaris and DAPU. For example, buffalo have increased to over 2,000, at a rate of almost 10% per year. Poaching is greatly decreased. In 2015, DAPU picked up 2,375 snares. But in 2016, they only had to collect 1,479. That is almost a 40% decline in snaring.

Charlton McCallum invests extensively in the Mbire community and runs the company as a joint venture with the community. (We provided details of their community programs in our January 19, *2015* letter providing enhancement information for the elephant.) As the attached report explains, in 2016, they drilled additional boreholes for the community to help relieve pressure from the continued drought.

However, it is an open question how long this success will last, with the decline in U.S. clients due to the suspension of elephant imports and the non-issuance of lion permits. Charlton McCallum Safaris' sales are down 40% since 2014. DAPU and the company's community programs are expensive (see page 9, showing $80,000+ in expenditures for 2016 and the proposed $95,000+ for 2017). We hope the FWS will act to issue permits before another of the best and most involved operators is irreparably damaged by the continued suspension of trophy imports.

Regina A. Lennox
Conservation Force
3240 S I-10 Service Road W, Suite 200
Metairie, Louisiana 70001 USA
504-837-1233 (office)

919-452-8652 (cell)
regina.lennox@conservationforce.org

---------- Forwarded message ----------
From: **John Jackson** <jjjiii@att.net>
Date: Tue, Jan 17, 2017 at 11:06 AM
Subject: Fwd: DAPU end of year report
To: Regina Lennox <regina.lennox@conservationforce.org>, Office <JJW-NO@att.net>, Marco Pani [redacted], Chrissie Jackson [redacted] matt.boguslawski@conservationforce.org, Shane Mahoney <shane@conservationvisions.com>, Philippe Chardonnet <igf@fondation-igf.fr>, Bert Klineburger [redacted]

-------- Forwarded Message --------
Subject: DAPU end of year report
Date: Tue, 17 Jan 2017 11:48:39 +0000
From: CM Safaris <buzzandmyles@cmsafaris.com>
To: John J. Jackson, III <jjj@conservationforce.org>

Attachments:

DAPU end of year 2016(2).pdf 944 KB

DAPU

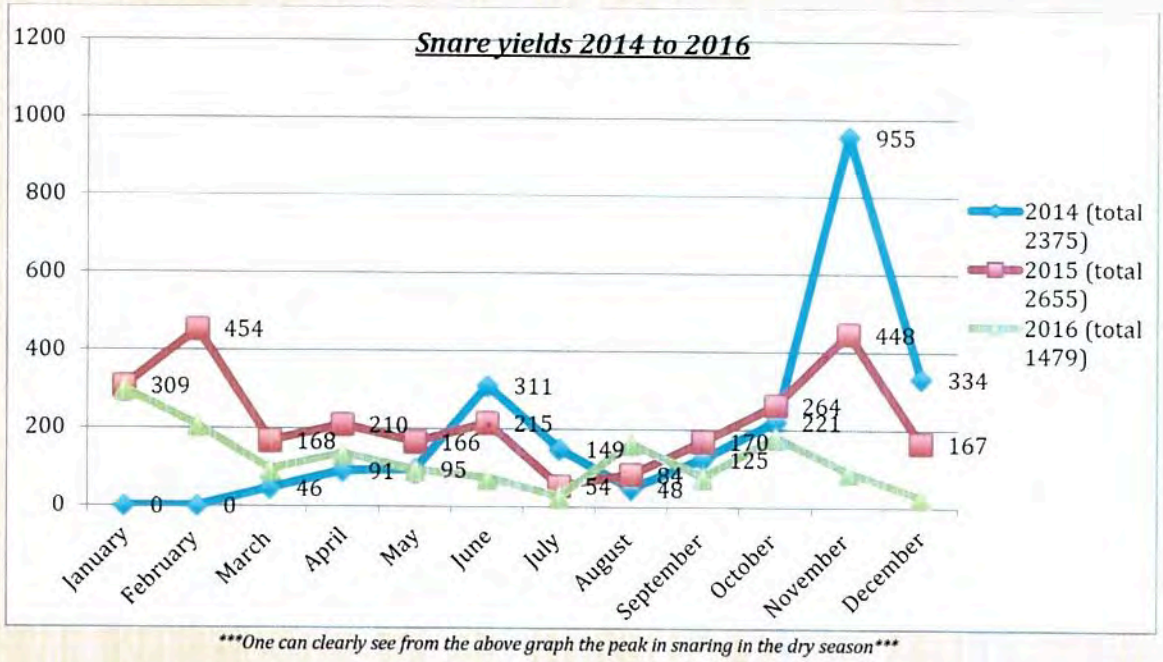
DANDE ANTI POACHING UNIT

End of year 2016

Dear Friends,

We have had a good 2016 – in fact after 7 years of running in DAPU Buzz and I can finally say for the first time we have really noticed the positive effects of our efforts. Every patrol report and every hunter or visitor is reporting more and more game. We estimate that we have consistently in excess of 2000 resident buffalo now – up from the 1200 in 2010 so the population has increased over 60% in 7 years (nearly 10% per annum).
With the exception of waterbuck it is safe to say that all game populations have increased nicely – so in theory, our year on year gains now should really accelerate as the math is finally on our side!

Snaring & general poaching.
We have long used "snaring" as an index with which to measure our general poaching, and we are happy to report that in 2016 our total snare yield of 1479 snares was 60% less than the 2375 snares found in 2014. Bongi and his teams have managed to really keep on top of their patrols.



****One can clearly see from the above graph the peak in snaring in the dry season****

2016 DAPU summary (12 months).

Month	No. of snares	Dogs shot	Meat Poachers convicted	Elephant poachers	Weapons retrieved	Rewards paid
January	300	0	3	0	0	US$821
February	208	0	0	2	0	US$978
March	95	0	0		0	US$97
April	137	0	1	0	2	US$321
	740	**0**	**4**	**2**	**2**	**US$2,217**
May	94	0	5	0	4	US$1,310
June	75	0	0	0	0	US$83
July	27	0	0	0	2	US$67
August	164	1	0	0	0	US$254
	360	**1**	**5**	**0**	**6**	**US$1,714**
September	78	0	0	0	1	US$97
October	181	0	1	0	1	US$447
November	92	0	2	0	0	US$442
December	28	0	0	0	0	US$532
	379	**0**	**3**	**0**	**2**	**US$1,518**
Total 2016	**1479**	**1**	**12**	**2**	**10**	**US$5,449**

**** It is clear to see the decline in poaching during the hunting season and also ... the impending increase in poaching activity as hunting slows down and we head towards Christmas. ****

****DAPU call sign posing proudly with "their" poacher and "his" warthog! ****

**** A typical haul of snares****

Third time offender – kudu cow

Elephant poaching.

Dande North and East (180,000 ha/ 462,000 acres) total loss for 2016 was 7 elephants. It is still too high a number but a fraction of those suffered by our surrounding areas (including Mana Pools National Park). There is most certainly a gang still operating in Dande and surrounding areas that we have failed to account for.

National Parks had a lucky break on Friday 25th November at 2250 hours when they arrested a gentleman with "1.8kgs of cyanide at Dande River Bridge. The accused was en route to Angwa where the cyanide was to be bought by a poaching syndicate and to be used on elephants for their ivory"

*** The accused with his Cyanide***

**** poached bull found by DAPU on neighbouring concession October 2017 – what a waste.****

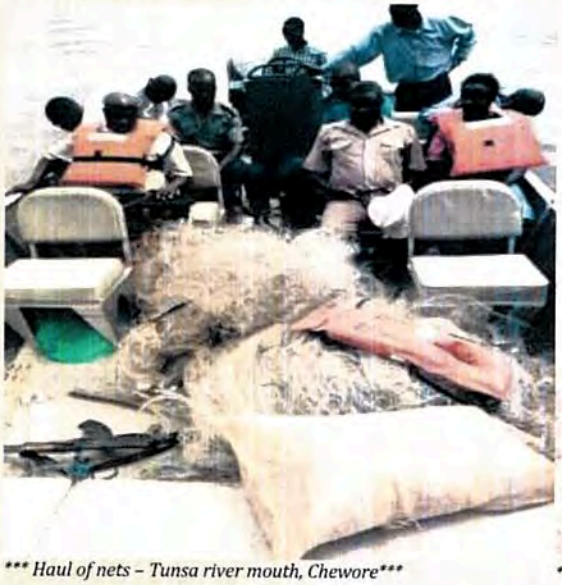
Year	No. of Elephant Carcasses
2010	40
2011	36
2012	16
2013	4
2014	9
2015	4
2016	7

Pushing the boundaries.

Now that the core areas of Dande North and East are much better controled and managed we have started "pushing the boundaries" which basically means DAPU along with National Parks has begun to conduct offensive partols in:

1. *Our neighbouring (Zim) concessions South of us and*
2. *Along the Zambezi river from Kanyemba way up into Chewore – and area that has been to long neglected. Considering that 75% of elephant poachers and ivory trade originates in Zambia – it only makes sense. Squirrel Merredith of Masau camp has been the driving force behind the initiative and DAPU/ CMS assisted with $500.00 which was used for rewards. DAPU will continue to be involved and help grow in this initiative .*

Area	Meters of nets	Dugouts	Banana boats	Arrests
Tunsa (Chewore)	600	0	4	2
DDF Kanyemba	1200	2	0	2



*** Haul of nets – Tunsa river mouth, Chewore***

lioness and kudu remains – neighboring concession

Horror scene

53 dead buffalo – in Mozambique close to our Zim border. An entire village turned out and chased the buffalo into the mud then killed them.

Problem Animal Control.

Duties for DAPU scouts also include attending to Problem Animal reports (PAC).

a. Elephant – There were not many serious reports in 2016 mostly because of the drought. Bongi and crew managed to successfully chase all elephant's out of crops and avoided shooting any which was great.

b. Lions – No loss of life reported in 2016 but a fair number of cattle were killed. No lions shot.

c. Buffalo – One man was seriously injured in the East in April, another killed in Kanyemba on the 14th August by a dagga boy and a second person injured by the same bull two weeks prior. As the buffalo population increases so there is more and more conflict.

d. Crocodiles – One person killed 2016.

e. Snake bites – One person killed 2016.
f. Hyenas – there are consistent and accurate reports of hyenas killing livestock especially in the East. It is a problem that is going to be addressed in 2017.

"Patrol Kit"

In the previous newsletters we mentioned that we were expecting some boots from the USA. Well they have arrived and have been issued so we have VERY happy Scouts!!! There is a second shipment expected with still more boots, handcuffs and water bottles. A HUGE thank you to Duke McCall who single handedly organized this!!!

Goals for 2016	Completed?
1. Continue with anti-poaching patrols.	Yes
2. Replace scouts that are not performing.	Yes
3. Early burning	Yes
4. Repair firearms where possible or replace	No
5. New boots and patrol kit.	Yes

Cost savings.

One of our biggest costs is obviously, vehicles, which are all but irreplaceable. In order to optimize our DAPU vehicle mileage we have had satellite-tracking units fitted to AAX 9832 as well as ABK 7074. The tracking units were both sponsored and fitted by "Trackit" – so a huge thank you to Richard Tennant and Hannes Scholtz of Trackit for their extremely valuable and useful donation.
If any of you are interested in specifically sponsoring one of these vehicles we will supply you with the login details and you can track the vehicle live!

Outreach work and general improvements.

In addition to our normal annual social programs, CMS drilled 7 boreholes in 2016 – of which 3 were successful and consequently equipped. The best of them was at Sende Village in the East and it will improve immeasurably the quality of life for those folk. One borehole was in the DSA for game. We are constantly looking for ways to improve Dande – ultimately the better managed the area is, and the more it yields then clearly it is easier to:

1. *Better afford anti poaching efforts.*
2. *Easier to push home long-term arguments to continue to protect the environment.*
3. *Easier to push forward long-term arguments to look after the animals – as they are worth looking after.*

**** Sende Village 30,000 liters/ hr.****

****Bongi at pumped pan in DSA – water is life****

The year behind us – 2016.

As I mentioned earlier 2016 has been our best year to date. The poaching trend has continued to decline and game populations have really started to improve quite quickly now. Elephant poaching trends continue to be stable. As DAPU has managed to really get on top of our local poaching, so they have begun to build momentum with offensive external patrols. In the end it is not enough for only Dande to be safe and healthy – we need our neighbors to be in the same state!

Massive thankyous to

Buzz and I would like to extend our eternal gratitude to so many well wishers, without whose help - none of what DAPU has achieved would have been possible. Our company sales have been down 40% since 2014 (thanks to USFWS) BUT we still to met our own annual commitments to DAPU and thanks entirely to the generosity of folk listed below actually received $15,000.00 more than we anticipated allowing us to exceed our budget by 18% (or ... $15,000!).

The list seems endless and includes but is not limited to:
Safari club International, The National Capital Chapter of Safari Club, The Chisholm Trail Chapter of Safari Club, The Sylvarnus Charitable Trust, Trackit, Flying for Wildlife,
Jytte Merjentsen, Juel Granum, Barry Shaw, Ike Ikeguchi, William Shores, Carl Frederick Nagel, Robert Keeler, Duke McCall, Mike Core, Bob Keeler, David Adams, Jerry Jurena, Marty Vick, Morten Skarra, Jerry Beardmore and Bob Schofield.

And <u>every client</u> that hunted with us in 2016 – they all contributed generously.

Special mention to <u>three young Zimbabwean farmers</u>, Charl Grobbelar, Pieter Greytenbach and Pip Madinson – who have helped suppliment rations and fuel. We know how tough it is for them so that makes their help even more special and shows the broad support DAPU has earned for itself.

<u>Artsits.</u> Gareth Hook and Peter Stewart who donated stunning work to be auctioned – proceeds to DAPU.

We must not forget <u>National Parks</u> and the <u>DAPU Scouts</u>, who are the ones that are actually out there, often in dangerous and uncomfortable conditions. Not only do they run the risk of being hurt by poachers but also by the wildlife.

Lastly a big thank you to Bongani Ndebele – aka "Bongi" who is a true leader and is responsible in no small part for the success. Bongi was deputized by Muno and Alfa both of whom made very positive impacts in their own way.

The year ahead 2017.

Bongi will continue to lead DAPU and our mission is to continue to improve our patrols and their effectiveness to help ensure the long-term viability of Dande North and East (.46% of Zimbabwe's total area!). With DAPU's help we are well on the way to making Dande the Zimbabwean flagship model for responsible sustainable use conservation.

All the very best for 2017.

Buzz and Myles

DAPU Income and Expenses 2016 - End of Year.

Income

Safari Club International	**US$8,900.00**
National Capital Safari Club	**US$1,500.00**
Chisolm trail Chapter of Safari Club	**US$500.00**
Sylvarnus Trust	**US$6,000.00**
Clients and Individual donations	**US$33,671.20**
Total.	**US$50,571.20**
C.M.S	**US$44,435.05**
Total Income	**US$95,006.25**

Expenses

 # 1 Wages, rewards and rations.

	Game Scouts	Bongi Muno & Alfa	Rations	Rewards	Total
January	US$1,100	US$1,605	US$770	US$821	US$4,296
February	US$1,100	US$1,605	US$770	US$978	US$4,453
March	US$1,100	US$1,605	US$770	US$97	US$3,572
April	US$1,100	US$1,605	US$770	US$321	US$3,796
	US$4,400	US$6,420	US$3,080	US$2,217	**US$16,117**
May	US$1,100	US$1,605	US$770	US$1,310	US$4,785
June	US$1,100	US$1,605	US$770	US$83	US$3,558
July	US$1,100	US$1,605	US$770	US$67	US$3,542
August	US$1,100	US$1,605	US$770	US$254	US$3,729
	US$4,400	US$6,420	US$3,080	US$1,714	**US$15,614**
September	US$1,100	US$1,605	US$770	US$97	US$3,572
October	US$1,100	US$1,605	US$770	US$447	US$3,922
November	US$1,100	US$1,605	US$770	US$442	US$3,917
December	US$2,200	US$3,210	US$770	US$532	US$6,712
	US$5,500	US$8,025	US$3,080	US$1,518	**US$18,123**

 # 2 2016 DAPU equipment expenses

DAPU Ammunition - National Cartridges	US$362.00
DAPU tents - Mabels Canvas	US$2,242.50
Uniform downsizing	US$330.00
Uniforms	US$1,078.00
Dapu # 1Toyota Land Cruiser AAX 9832 - Grease Junky	US$2,230.75
Dapu # 1Toyota Land Cruiser AAX 9832 - Tineo Enterprises	US$1,078.00
Dapu # 2 ABK 7074 - Alpine panel beaters	US$1,437.00
DAPU # 2 ABK 7074 Burj Auto	US$1,425.00
DAPU # 2 ABK 7074 Grease Junky	US$3,974.00
DAPU # 2 ABK 7074 Windscreen	US$60.00
DAPU # 2 ABK 7074 injector pump Geribran services	US$720.00
	US$14,937.25

 # 3 Vehicles (2).

Mileage ABM 5149 Jan - April 3400 +10297 km,s = 13697 x $.5/ km	US$6,849
Mileage AAX 9832/ABK 7074 january - April = 8000+ 6783 = 14,783 *.5/km	US$7,392
Mielage AAX 9832 May - December 2016 = 17350 kms * $.05/km=	US$8,675
Mileage ABK 7074 May- December 2016 = 14,600km *$.5/km =	US$7,300
	US$30,215

Total expenses		**US$95,006**
Total Income	**US$95,006**	
Shortfall		**US$0**

DAPU actual 2016 BUDGET and proposed 2017.

	2017 Budget	% Variance	2016 actual	2016 (proposed)	2015 (actual)	2014 (actual)
Reciepts						
From Sylvarnus Trust, SCI & clients	US$50,571	48%	US$50,571	US$34,056.00	US$34,956.00	US$35,904.00
Charlton McCallum Safaris	US$44,435	-5%	US$44,435	US$46,653.00	US$49,756.70	US$36,064.00
	US$95,006	**18%**	**US$95,006**	**US$80,709**	**US$84,713**	**US$71,968**
Less Expenses						
Wages (scouts)	US$14,300	0%	US$14,300	US$14,300.00	US$14,300.00	US$13,075.00
Management	US$20,865	15%	US$20,865	US$18,200.00	US$18,200.00	US$18,200.00
Rations (from January x 22 scouts).	US$9,240	0%	US$9,240	US$9,240.00	US$9,240.00	US$7,980.00
Rewards	US$5,449	-43%	US$5,449	US$9,582.00	US$9,582.00	US$9,602.00
Equipment	US$14,937	76%	US$14,937	US$8,500.00	US$2,603.00	US$6,861.00
Landcruiser opperating costs	US$30,215	45%	US$30,215	US$20,888.00	US$20,888.00	US$16,250.00
	US$95,006	**18%**	**US$95,006**	**US$80,710.00**	**US$74,813.00**	**US$71,968.00**
Shortfall	**US$0**	**0%**	**US$0**	**-US$1.00**	**US$0.00**	**US$0.00**

*** Thanks to extra income we were able to go 18% over budget and we spent that money on deployments and vehicles***

*** We hope to be able to achieve in 2017 exactly what we were able to in 2016 hence our budget is same as 2016 actual***

CONSERVATION FORCE A FORCE FOR WILDLIFE CONSERVATION

† BARON BERTRAND DES CLERS, PH.D.
† JAMES G. TEER, PH.D.
† BART O'GARA, PH.D.

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DALE TOWEILL, PH.D.

Timothy J. Van Norman, Chief, Branch of Permits
Division of Management Authority
U.S. Fish and Wildlife Service
5275 Leesburg Pike
Falls Church, Virginia 22041-3803
Phone: 703-358-2104, ext. 1983

January 19, 2015

BY FEDERAL EXPRESS AND EMAIL (without attachments)

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John J. Jackson, III
Conservation Force
3240 S. I-10 Service Road W., Suite 200
Metairie, Louisiana 70001-6911
Phone: 504-837-1233
Fax: 504-837-1145
Email: jjw-no@att.net

CC: Dan Ashe, Director of FWS (Letter by email)
Bryan Arroyo (Letter by email)
Rosemarie Gnam (Letter by email)
Attachments

Subject: Supporting Documentation - Comments Demonstrating Enhancement from Tourist Hunting in Zimbabwe
From: "John J. Jackson, III" <jjw-no2@att.net>
Date: 1/23/2015 9:11 AM
To: Tim Vannorman <Tim_Vannorman@fws.gov>
CC: Dan Ashe <dan_ashe@fws.gov>, Bryan Arroyo - FWS <bryan_arroyo@fws.gov>, "Gnam, Rosemarie" <rosemarie_gnam@fws.gov>

Tim,

See attached cover letter. The entire package was Fed Ex'd to you yesterday afternoon.

Best,
John

--
John J. Jackson, III
CONSERVATION FORCE
3240 S. I-10 Service Road W., Suite 200
Metairie, Louisiana 70001
Tel: (504) 837-1233
Fax: (504) 837-1145
jjw-no@att.net
www.conservationforce.org

Attachments:

Supporting Documentation - Enhancement Zimbabwe.pdf	1.9 MB

Timothy J. Van Norman, Chief, Branch of Permits
Division of Management Authority
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5275 Leesburg Pike
Falls Church, Virginia 22041-3803
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Fax: 504-837-1145
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CC: Dan Ashe, Director of FWS (Letter by email)
Bryan Arroyo (Letter by email)
Rosemarie Gnam (Letter by email)
Attachments

Index of Attachments

1. Lodzi Hunters
   - Social Responsibilities Carried Out Within the Tsholotsho South CAMPFIRE Area 2013 / 2014 – Schools
   - Social Responsibilities Carried Out Within the Tsholotsho South CAMPFIRE Area 2013 / 2014 – Payments to the Tsholotsho South CAMPFIRE / RDC
   - Social Responsibilities Carried Out Within the Tsholotsho South CAMPFIRE Area 2013 / 2014 – Local Wards
   - Social Responsibilities Carried Out Within the Tsholotsho South CAMPFIRE Area 2013 / 2014 – Assistance Rendered to Hwange National Park
   - Social Responsibilities Carried Out Within the Tsholotsho South CAMPFIRE Area 2013 / 2014 – Health Clinics, Rural District Council, Government Departments
   - Social Responsibilities Carried Out Within the Tsholotsho South CAMPFIRE Area 2013 / 2014 – Other Relevant Documents
   - Tender Proposal to the Tsholotsho South CAMPFIRE Area
2. Charlton McCallum Safaris, Dande Anti-Poaching Unit Book
3. Sworn Declaration of Chrissie Jackson, Treasurer of Conservation Force

Gmail **Regina Lennox <regina.lennox.cf@gmail.com>**

Confidential Anti-Poaching Information for Zimbabwe

1 message

Regina A. Lennox <regina.lennox@conservationforce.org> Wed, Feb 1, 2017 at 9:51 AM
To: "Vannorman, Tim" <tim_vannorman@fws.gov>

Dear Tim,
Attached please find confidential anti-poaching information for Zimbabwe. This reflects implementation of the Mana Pools/Lower Zambezi regional elephant management plan.
Please consider this information in making an enhancement finding for Zimbabwe.
Best wishes,
Regina

Regina A. Lennox
Conservation Force
3240 S I-10 Service Road W, Suite 200
Metairie, Louisiana 70001 USA
504-837-1233 (office)
919-452-8652 (cell)
regina.lennox@conservationforce.org

Da: Chris Moore (b) (6)
Oggetto: 2016 AFRICAN CONSERVANCIES report (2).docx - Hword
Data: 31 gennaio 2017 15:21:32 CET
A: Marco Pan (b) (6)

Hi Marco,

Not as dramatic as 2015, not from lack of effort but we had far fewer incursions due to removal of space and removal of firearms 2015. We are working on securing the southern boundary now. I am going to have to find some funding this year. I feel my best way is to auction some hunts?

I hope this finds you well and when are you and Mr. Jackson coming to visit us in Omay to hunt a nyami?

Chris

2016 AFRICAN CONSERVANCIES report (2).docx
191K

AFRICAN CONSERVANCIES

ANTI-POACHING REPORT

2016

AFRICAN CONSERVANCIES

African Conservancies was established in 2014, and the first project was in Nyaminyami Rural District Council, the Omay Communal Land hunting area. AC comprises Carbon Green International, the relevant Rural District Council and the relevant community in which the conservation plan falls. A trust has been formed that will include these parties as beneficiaries.

The primary goal of AC was to locate a suitable area to form, build and manage a sustainable community conservation area. The Omay 1 hunting area between the Ume and Sengwa Rivers was selected as a perfect phase one. The criteria of selection include: being communal land hunting area, falling within the CGI REDD+ project area, and having a suitable residual resource and forest land to be able to resuscitate.

OBJECTIVES OF AFRICAN CONSERVANCIES

The primary objective of AC was to select an area within the REDD+ project, (stretching from Binga to Kanyemba in the communal areas) and partner the community and council. The belief in building sustainable conservation areas and in particular enabling communities to truly and directly benefit from this sustainable utilization is at the core of this project.

The immediate goals with the Ume River Community Conservation Area were to reduce hunting offtake and reduce poaching. The hunting offtake was reduced in 2014, 2015 and in 2016. For example, 2014 saw twelve buffalo being hunted from the quota of thirty five. In 2015 we had a buffalo offtake of ten from the possible thirty five. Having done our own numbers on the ground, our offtakes are very conservative and the population increase through relocation due to no hunting pressure is clearly visible, with far better trophy quality and substantial numbers increases across species.

Anti-poaching began in 2014, with six CGI game scouts based out of Manyuli camp close to the Gokwe boundary and six scouts based out the Ume hunting camp. We decided at the close of 2014 that the anti-poaching was not having enough effect on the structured elephant poaching, so in March 2015 Steve Wentzel and I decided that it needed direction and management. So beginning in March, I personally came into the Omay to oversee and manage the anti-poaching teams.

I immediately amalgamated the two teams and brought in Mr Charles Khumalo to head up this new team. Charles is ex-Zimbabwean National Army, a brave, dedicated leader, who has commanded not only the respect of this unit, but myself and the community at large.

We started in-house training incorporating firearms training, tactical house clearances, offensive tracking and in the process building a more intense unit that could cope with a far more aggressive outlook to the poaching problems. This immediately began to produce results.

This team has increased in size and area of operations; in 2015 additional capacity was attained to eighteen personnel and there are four fixed bases of operations.

Our focus has been on hardened, armed poachers with the theory that the fish, snare, and dog bushmeat poachers would be dealt with in the process of eliminating the more "serious" elements.

AREA OF OPERATIONS

Though we in theory are based in the Omay communal land, our operations stretch into Gokwe, around Chizarira and Charisa and Binga. Due to our operations being outside of the National Parks we predominantly operate with Zimbabwe Republic Police details and RDC game scouts. Our entire unit has now been accepted as Police reservists and we are awaiting our Police force numbers.

It has been agreed that our unit, having been accepted as reservists, will establish a dedicated reaction team within the police force that I shall train and manage. The first in-house courses in conjunction with Police and ourselves are set to begin early 2017. We hope to achieve better safety, operational cohesion and teamwork by implementing standardized Standard Operating Procedures and insight into our intelligence and operations work.

OPERATIONS

In August 2015 Charles Khumalo was tasked with resurrecting and bettering the information gathering networks, as reacting to shots fired is almost a pointless affair. The poaching teams shoot toward last light and fifteen minutes from shots fired the elephant's face is chopped off and the poachers are moving. There is no way to track them fast enough to catch them up at this stage. The needle-in-a-haystack affair is almost pointless for arresting poachers. There are over two million acres of bush to patrol and it would require an army to do this.

The informant/intelligence network has had significant effect; we had over one hundred and twenty people on our books at the beginning of 2015. We have over one hundred and eighty at this time. Over ninety five percent of our arrests have occurred and been made possible through the capturing or purchasing of intelligence that is then collated, vetted and prioritized.

Our full-time Intel man has proven time and time again that our focus on the "funnies" department produces results. By taking away the safe zones of the community that the poaching teams utilized in the past, they are now severely limited as to where and how to carry out illegal operations without being compromised. We incorporate many layers into this department.

EDUCATION

Educating people and school children to the value of their wildlife and ensuring the CAMPFIRE funds trickle down and are utilized correctly is essential. In doing this we ask communities to embrace the teams' desire to protect their valuable resources and to understand that without the participation of the community in our protection efforts there is very little hope for the future as the community only has their renewable resources to consistently rely on.

PAC

We make sure the community is protected from the wildlife and ensure that we promptly carry out PAC (Problem Animal Control) operations. We carry out PAC work in predominantly a non-

lethal method, fireworks, implementation of beehive projects on elephant entrance routes, reinforcing stock pens against lions, and teaching methods of pushing unwanted wildlife back into the conservation areas - and supporting communities to do this.

UNDERCOVER OPERATIONS

There are continual rolling undercover operations taking place. These again vary in style and target various criminal elements. The “sales” department, “purchase” department and “poaching” department. The covert teams pose as the above, leading to sting operations carried out in conjunction with the police. These teams actively work their way into the ivory trade in the area, building up intelligence and “networking” the illegals and setting up stings that protect the identities and integrity of undercover teams and Confidential Informants. These ops by nature are very testing and have a high danger component that takes a certain type of individual to carry out with a high degree of success.

ENTRIES AND EXITS

The poaching teams generally originate from south of Nyaminyami district, with a few (under 5%) from Zambia to the north. Over 85% of them have to enter and exit the areas and cover substantial distances generally on foot. A substantial amount of time is put into understanding these routes, mapping them, walking and timing them, watching them physically or with trail cameras or in establishing informants to monitor the routes. By doing so we have formed a very good idea of which team is on the way in or has come into the area and where to intercept them on the way out or set up sting ops to catch them on exit.

GENERAL PATROLS

General cross-graining for spoor is carried out between intel operations, with the entries and exits work helping to minimalize the amount of area that requires coverage. We will also utilize this quiet time to carry out work on lesser criminal activities like bushmeat and fish poaching.

SUCCESFUL OPERATIONS

25 January. Confidential Informant (CI) resulted in a night operation on a poacher’s home resulting in an arrest and recovery of an illegal firearm used for elephant poaching.

13 March. CI led to an ambush of an entrance route from Binga. The poaching team changed their route, resulting in an imperfect ambush. On contact, one was arrested and three escaped. Tracker team follow-up found the escapees fled to Zambia to avoid arrest.

21 March. A patrol found a fresh snare line. Tracker team followed up approximately 30 km to homesteads. Subsequent search and questioning led to the arrest of two and recovery of 25 snares and spears.

4 April. CI led to a night op on two locations. One with an illegal firearm and the second with the ammunition, both recovered. Warrants of arrest have been issued for the individuals involved.

13 July. Tracker team follow-up of suspicious spoor led to the arrest of an individual laying cable snares, 17 cable snares were recovered.

15 July. Observation team sighted a suspicious fire at night. OP guided tracker team in at first light. Were fired upon, poachers fled during exchange of fire.

15 October. Tracker team with information from CI followed spoor of elephant poaching team leading to Matusadona National Park. Contact and exchange of fire ensued, contact initiated prematurely due poaching teams imminent entry to the Park. Suspects fled into the Park unfortunately holding the firearm but dropping other equipment. Cross-boundary follow up delayed due the time of day.

3 November. Suspect photographed by trail cam exiting Park with Ivory. After positive ID, night op resulted in his arrest. Trial is ongoing, critical due to the first time photographic evidence of this nature will be utilized for state prosecution.

3 November. CI information led to the arrest of a poacher found in possession of poached buffalo meat and poaching equipment.

18 December. CI information led to arrest of an individual in possession of pangolin scales and skins, buffalo carcass and equipment.

26 December. CI information led to a night op and the arrest of a known meat poacher. Illegal bush meat, snares and equipment were recovered.

ARRESTS

ELEPHANT POACHING	**3**
MEAT POACHING	**12**
ILLEGAL FISHING	**30**
GOLD PANNING	**7**

	52
RECOVERIES	
WEAPONS	**2**
SNARES	**119**
ILLEGAL NETS	**+ 4000m**

GENERAL

2016 saw a massive reduction in poaching activities and the increase in game numbers is now quite visible. Over the last nineteen months only four elephant have been poached in the whole of Omay. We believe that these results have been achieved by the continuous efforts to reduce the operating space and safe zones for poaching teams and the significant reduction in firearms available to the teams from our 2015 recoveries of illegal weapons.

Poaching teams still enter Matusadona National Park via their southern boundary, and 2017 will see our teams operating to close these routes down and we expect significant action over the coming months.

2015 saw the unfortunate murder of one of our confidential informants. The person targeted was the head of our intel section. His brother, the CI was poisoned and died. The subsequent attempts to poison senior members of our team and myself just go to prove the impact that we have had on the illegal elephant poaching in the Omay and to the lengths these gangs will go.

We would not be able to operate without the significant financial assistance we receive from Carbon Green Africa and the Safari stakeholders in the Omay. Hunting and the sustainable utilization of forests plays a pivotal role in the subsistence of the communities that live in Omay. Our role in contributing to a sustainable livelihood from these renewable resources on behalf of the communities is imperative. Any assistance contributed toward this in any format always goes a long way.

CHRIS MOORE
AFRICAN CONSERVANCIES
chrismoore.saf@gmail.com

Gmail **Regina Lennox <regina.lennox.cf@gmail.com>**

Zambian poacher shot in Zimbabwe

Regina A. Lennox <regina.lennox@conservationforce.org> Mon, Feb 22, 2016 at 4:33 PM
To: "Vannorman, Tim" <tim_vannorman@fws.gov>
Cc: "John J. Jackson, III" <jjw-no2@att.net>

Dear Tim,
Please see the article below on recent anti-poaching efforts in Zimbabwe.
Kind regards,
Regina

---------- Forwarded message ----------
From: **Regina A. Lennox** <regina.lennox@conservationforce.org>
Date: Mon, Feb 22, 2016 at 12:01 PM
Subject: Zambian poacher shot in Zimbabwe
To: John Jackson <jjjiii@att.net>, "John J. Jackson, III" <jjw-no2@att.net>

Interesting because it refers ton a "new hit-and-run tactic." The good news is that ZimParks was quick to respond.

Zambian poacher shot dead in Zimbabwe

news/africa /

22 February 2016 at 11:22am

By: Oscar Nkala [this guy writes for the National Geographic Wildlife Watch blog]

Gaborone - A Zambian poacher was killed by Zimbabwean game rangers in a gun-battle that led to recovery of a rifle and 13 rounds of live ammunition at the Matetsi National Park, near the resort town of Victoria Falls on Saturday morning, a leading conservation group has reported.

According to a statement released on Sunday by Trevor Lane, chairman of the Victoria Falls-based conservation group Bhejane Trust, two other suspects escaped arrest and abandoned their cellphones after being ambushed by game rangers.

The rangers recovered the carcass of an elephant the poachers had just killed. The tusks were still intact.

“Two shots were reported early on Sunday morning, and parks rangers immediately reacted by deploying patrols in the area,”said Lane, adding that “two more shots were then heard, and the patrol went to investigate and found a dead elephant with the tusks intact”.

Giving further details Lane said: “They went into ambush and three Zambians showed up. The rangers killed the gunner in the ensuing gun-battle, but the other two escaped. They recovered the body, a .375 rifle, 13 rounds and two cell phones”.

Further, he said the poaching operation confirmed a new hit-and-run tactic developed by Zambian poachers, who enter Zimbabwe in small groups and escape back to their country immediately after committing poaching crimes.

The fatal shooting of the poacher came a few days after the bodies of two more Zambian poachers were found floating on the Zambezi River near Victoria Falls.

Police believe the two dead poachers could have been shot in a February 14 gun-battle with game rangers.

The relatives of the deceased have since collected the bodies for burial in Zambia.

Another Zambian poacher who was arrested with 25 rounds of ammunition, two axes, butcher knives and 2kg of dagga was due to appear at the Victoria Falls Magistrates Court on Monday.

Christopher Malasa Mandanya is facing charges of illegal possession of firearms, possession of drugs and illegal entry into Zimbabwe.

African News Agency

http://www.iol.co.za/news/africa/zambian-poacher-shot-dead-in-zimbabwe-1987901

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Regina Lennox <regina.lennox.cf@gmail.com>

Enhancement information for African lion and elephant

3 messages

Regina A. Lennox <regina.lennox@conservationforce.org> Wed, Feb 24, 2016 at 10:28 AM

To: "Vannorman, Tim" <tim_vannorman@fws.gov>
Cc: Rosemarie Gnam <rosemarie_gnam@fws.gov>, bryan_arroyo@fws.gov, "John J. Jackson, III" <jjw-no2@att.net>
Bcc: John Jackson <jjjiii@att.net>

Dear Tim,

In the email below, please find links to four recent videos documenting the benefits of conservation hunting in Tanzania, Zambia, and Zimbabwe. These videos include interviews with government officials, anti-poaching scouts, safari operators, landowners, and others. They demonstrate the enhancement generated by lion hunting: it protects the most habitat, provides the backbone for anti-poaching, and incentivizes community participation in wildlife conservation. Without hunting, these benefits would be lost, and the wildlife would be lost. As Tanzania's former Minister of Natural Resources and Tourism put it in the video titled "Custodians of Wilderness": "So for those who are anti-hunting and would like to see hunting closed: if hunting is completely gone, you're gonna kill Selous, you're gonna kill all the 28 game reserves in this country for sure, and all the wildlife coming out of the protected areas into the open areas for example will be gone."

Please consider this information in evaluating whether to issue import permits for hunting trophies of African lion and elephant, including but not limited to elephant trophies from Tanzania and Zimbabwe and lion trophies from Tanzania, Zambia, and Zimbabwe (including but not limited to the applications already submitted by Conservation Force, such as the applications submitted on January 26, 2016, which include MA86474B-0 and MA86472B-0, and MA88388B).

There are many important points in these videos which document and demonstrate enhancement. A few examples are included here, but the videos should be considered on the whole.

First, in the video "Custodians of Wilderness," safari operators discuss and demonstrate their community development programs. Among other things, Derrick Hurt of Robin Hurt Safaris/Robin Hurt Wildlife Foundation points out that over $100,000 in community assistance was spent in one schoolyard in one village – all proceeds from hunting, and the Hurt Foundation makes clear to the community these benefits come directly from the protection of wildlife.

Another representative from the Hurt Foundation points out that there are around 50 hunting companies in Tanzania with 3 to 4 blocks each, meaning there are approximately 200 vehicles patrolling hunting areas every day, adding an incredible amount of anti-poaching value to protect the lion's prey base. This Tanzania video is available at: http://theconservationimperative.com/.

Second, in the video "The Fate of the African Lion: Tanzania," a representative of the Friedkin Conservation Fund points out there is a lot of pressure on the boundaries of hunting areas in Tanzania because of the extensive population growth and human, livestock, and agricultural encroachment. The hunting areas are buffer zones for the national parks and the private sector bears the cost of opposing the encroachment pressure. But if the hunting areas disappeared, the pressure would be on the national parks directly. In his words: "What is interesting in Tanzania is that when the hunting concessions were designated as such, a lot of them were

designated around the national parks. And this forms a buffer zone around the national park. If these [hunting] areas become degazetted or lose viability ... the human pressures that are occurring on those hunting concessions can be directly transferred onto the national parks. And we're talking national treasures ... This happened in Kenya..."

Put differently, hunting areas play a key role in maintaining the viability of national parks, and thus serve to expand and better protect habitat and prey base and keep human-wildlife conflicts out of the treasured national parks. This Tanzania video is available at: http://theconservationimperative.com/?p=124.

Third, the video "The Fate of the African Lion: Zambia" focuses on several hunting concessions in Game Management Areas in Zambia. It interviews a former poacher turned anti-poaching officer who talks about the communities around the Game Management Areas benefiting from the sustainable use of lion and turning away from poaching. This Zambia video is available at: http://theconservationimperative.com/?p=118.

Last but not least, the video "The Fate of the African Lion: Bubye Valley Conservancy" describes the history and conservation of the conservancy and current challenges it faces, including an overpopulation of lion. The video shows how the revenue generated by lion hunting pays for extensive anti-poaching to protect the prey base and important populations of black and white rhino (among other species; put differently, the hunting of one species pays for the protection of many). Bubye Valley Conservancy derives its income from hunting, and hunting has proven to be the most viable use for the area, which is proven because ranching and other uses were tried. As Bubye Valley's anti-poaching manager notes: "Having this large unit of land set aside for wildlife has meant that endangered species like black and white rhinoceros thrive here. We've got important populations of cheetah, wild dog as well, brown hyena, pangolins ... So under the umbrella of hunting, this whole habitat is benefiting a whole variety of other species that are not consumptively hunted but they're benefiting from this wildlife area. Without hunting, we would be very hard put to justify keeping this big expensive land in its current land use."

The video also evidences the community assistance program of Bubye Valley Conservancy, which includes among other things, a clinic, a water supply for a school, and a meat donation system that gives local chiefs the choice about how to use the meat (i.e., whether to eat or sell it). The game meat donation program is a "direct spinoff" of the hunting, and builds a strong relationship with the chiefs. Poachers from these communities are taken to the chiefs' courts and prosecuted there, and "asked to compensate for the value of the animals killed and the compensation goes back to the community kitty." This is a powerful community engagement system that benefits the wildlife directly.

The video emphasizes that Bubye's lion population has to be managed (because the conservancy is fenced and the lion will over-eat the plains game). The options are hunting or culling, but hunting offers a better value generation. As the video concludes: "Bubye Valley Conservancy is one of the most ambitious, self-sustaining private sector initiatives for wildlife conservation in Africa today. It is not reliant on donor or government handouts for its existence. It is an extremely efficient game sanctuary with a comprehensive management plan which includes detailed research projects. It also provides a land use model not only for Zimbabwe, but the whole of Africa and beyond. But, it is reliant on sport-hunting for its survival." This Zimbabwe video is available at: http://theconservationimperative.com/?p=112.

Please let us know if you have any questions about these videos.

Kind regards,

Regina

--

Regina A. Lennox
Conservation Force

Gmail

Regina Lennox <regina.lennox.cf@gmail.com>

Zimbabwe Elephant Enhancement -- Final print of National Elephant Management Action Plan

1 message

Regina A. Lennox <regina.lennox@conservationforce.org> Mon, Feb 29, 2016 at 11:26 AM
To: "Vannorman, Tim" <tim_vannorman@fws.gov>, craig_hoover@fws.gov
Cc: bryan_arroyo@fws.gov, Rosemarie Gnam <rosemarie_gnam@fws.gov>, dan_ashe@fws.gov, "John J. Jackson, III" <jjw-no2@att.net>
Bcc: John Jackson <jjjiii@att.net>

Dear Tim and Craig,
Attached please find a final PDF version of Zimbabwe's National Elephant Management Action Plan which includes the Minister's, Permanent Secretary's, and Director-General's signatures and cover page. This is the final format of the "hot off the presses" version we handed you in Vegas.
Regards,

--
Regina A. Lennox
Conservation Force
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Metairie, Louisiana 70001 USA
504-837-1233 (office)
919-452-8652 (cell)
regina.lennox@conservationforce.org

ZIMBABWE ELEPHANT MANAGEMENT PLAN APPROVED FINAL.pdf
2556K

Subject: Fwd: Re: ZimParks recovers $50 000 elephant tusks from poachers
From: "John J. Jackson, III" <jjw-no2@att.net>
Date: 3/3/2015 9:10 AM
To: Tim Vannorman <Tim_Vannorman@fws.gov>

FYI

-------- Forwarded Message --------
Subject: Re: ZimParks recovers $50 000 elephant tusks from poachers
Date: Tue, 3 Mar 2015 15:09:11 +0100
From: Marco Pani <(b) (6)
To: John Jackson <jjjipad@conservationforce.org>, John J. Jackson III <jjw-no2@att.net>

John,

Thank you very much for your message.

I have not yet established my flights and trip organization because I was waiting for an invitation. I will email Lynne to see at which stage of preparation they are.

Best

Marco

> Il giorno 03/mar/2015, alle ore 14:57, John Jackson <jjjipad@conservationforce.org> ha scritto:
>
> MARCO, thank you.
> Chrissie tells me she is making the wire transfer you this morning which should bring your monthly fee through March. Have you established your flight for the next workshop? Please get on it to keep the costs down. Conservation Force is absorbing your costs fully, not SHIKAR or DSC.
>
> Sent from my iPad
>
> On Mar 3, 2015, at 7:08 AM, Marco Pani <(b) (6) > wrote:

FYI

Marco

https://www.newsday.co.zw/2015/02/26/zimparks-recovers-50-000-elephant-tusks-poachers/

ZimParks recovers $50 000 elephant tusks from poachers

February 26, 2015 in **News**

The Zimbabwe Parks and Wildlife Management Authority (ZimParks) ambushed 12 suspected poachers from Zambia and recovered almost $50 000 worth of elephant tusks in a recent operation in Katombora, Zambezi National Parks' Mdhaka area.

BY OUR STAFF

ZimParks public relations manager Caroline Washaya-Moyo said the success of the operation was achieved through regional collaborations with rangers from neighbouring countries.

"However the suspects, believed to be Zambian nationals, fled leaving behind the 29 tusks which weighed 297,3kg and valued at $47 468, a giraffe tail, digital scale and some food items," she said in a statement.

Investigations were in progress including another case in which two rhinos, one female and a calf, were poached in Save Valley Conservancy. Both had all their horns removed.

Recently, two poachers were shot and killed by ZimParks rangers during an armed contact in the Kapungashiri area on the southern boundary of Matusadonha National Park.

Rangers who were on patrol in the area were alerted by two heavy calibre gunshots which led them to three poachers who opened fire.

During the shootout two of the poachers were killed while the third one escaped unhurt.

Poaching remains a threat in the country's vast game parks as long as there is a ready market for ivory and rhino horn. Stakeholders have called for stiffer penalties to deter poachers.

Subject: Fwd: Re: Zimbabwe Update
From: "John J. Jackson, III" <jjj@conservationforce.org>
Date: 3/6/2017 9:18 AM
To: Bryan Arroyo - FWS <bryan_arroyo@fws.gov>
CC: Tim Vannorman <Tim_Vannorman@fws.gov>, Rosemarie Gnam <Rosemarie_Gnam@fws.gov>

Bryan,

This is the status of Zimbabwe from my end . I hope we can get some movement from FWS.

Thanks,

John

On Mar 3, 2017, at 2:53 PM, John J. Jackson, III <jjj@conservationforce.org> wrote:

> -------- Forwarded Message --------
> **Subject:** Re: Zimbabwe Update
> **Date:** Fri, 3 Mar 2017 22:40:21 +0200
> **From:** Mupazviriho [(b) (6) redacted]
> **To:** John J. Jackson, III <jjj@conservationforce.org>
>
> We have submitted all the documentation required relating to
> Non detrimental findings for both lions and leopards
> Elephant management plans showing priority areas
> Budgets for conservation arising from hunting
> Community livelihoods from hunting
>
> It would be important to ask Bryon Arroyo what is the next step since Zimbabwe submitted what they asked for and we are willing to collaborate closely so that the matter is resolved in the interest of conservation
> Best regards
> Prince Mupazviriho

Sent from my iPad

On 03 Mar,2017, at 6:13 PM, John J. Jackson, III <jjj@conservationforce.org> wrote:

> Prince,
>
> I'd like to speak with you about any conversations you have had with the USFWS at the SCI convention. I expect to be meeting with Bryan Arroyo the Director of International Affairs next week. I want to arm myself with the facts so I can ask the right questions. What is your Skype number?
>
> I need to be updated on lion, elephant and leopard in Zimbabwe. So that I can make the most of the new U.S. Administration.
>
> Thank
>
> --
> <mime-attachment.jpg>

Subject: Fwd: Mana Pools Workshop
From: "John J. Jackson, III" <cf@conservationforce.org>
Date: 3/11/2015 10:45 AM
To: undisclosed-recipients:;
BCC: Tim Vannorman <Tim_Vannorman@fws.gov>, Bryan Arroyo - FWS <bryan_arroyo@fws.gov>, Pamela_Hall@fws.gov, "Gnam, Rosemarie" <rosemarie_gnam@fws.gov>, Shane Mahoney <conservationvisions@gmail.com>, Chrissie Jackson <cjackson@conservationforce.org>, Don Lindsay <railwood@iafrica.com>, Bert Klineburger <bklineburger@gmail.com>, Dale Toweill <dtoweill@gmail.com>, "Damm, Gerhard" <gerhard@muskwa.co.za>, Philippe Chardonnet <p.chardonnet@fondation-igf.fr>, John Thodos <johnthodos@gmail.com>, bill brewster <bbrewster@caphillgrp.com>, Ralph Cunningham <ralphscunn@aol.com>, Mike Branham <mwbranham@gmail.com>, Lori Clem <Lori@toothacres.com>, Alan Sackman <a.sackman@sackman.com>, James Mitchell <jamesfrancis7277@aol.com>, Wes Bates <wcbates@steemer.com>, Rolf Baldus <rolfbaldus@t-online.de>, Thys De Vries <lde@netconnect.co.zw>

FYI

-------- Forwarded Message --------
Subject: Mana Pools Workshop
Date: Wed, 11 Mar 2015 12:23:49 +0200
From: Lynne Taylor <lynne@thetashingainitiative.org>
To: David Cumming <(b) (6)>, Diane Skinner <(b) (6)>, Nicci & John Stevens <nicci@johnstevenssafaris.com>, Alistair Pole <APole@awf.org>, Clive Jones <clive@carguard.co.zw>, Richard Maasdorp <(b) (6)>
CC: Russell Taylor <(b) (6)>, Marco Pani <(b) (6)>, John J. Jackson, <jjw-no2@att.net>

Dear All,

Geoffreys Matipano has confirmed yesterday evening by email that the Workshop can go

ahead.

I have made payment to Chirundu Safari Lodge using the funding raised by John and Nicci! Fantastic!

I do not know when the invitations will be sent out, but the DRAFT versions, one for Parks, one for non-Parks invitees, are attached for your information again.

I met with Alistair Pole this morning and TI will complete the Grant Award Agreement from AWF for its fantastic donation towards the Mana Pools Workshop. Thank you very very much Alistair for making this happen.

Best wishes,
Lynne

Attachments:

NON-PWMA INVITATION 2015 MANA POOLS WORKSHOP.pdf	757 KB
Attached Message Part	217 bytes
PWMA INVITATION 2015 MANA POOLS WORKSHOP.pdf	631 KB
Attached Message Part	2.3 KB

INVITATION

A COLLABORATIVE WORKSHOP HELD BY PARKS AND WILDLIFE MANAGEMENT AND PRIVATE SECTOR TO DEVELOP AN ANTIPOACHING STRATEGY FOR MANA POOLS NATIONAL PARK

Zimbabwe Parks and Wildlife Management authority cordially invites you to attend a Workshop

To travel to Chirundu Safari Lodge on 30th March, Workshop to be held 31st March and 1st April, depart 2nd April, 2015

at CHIRUNDU SAFARI LODGE

RATIONALE:

There is need for a greater coordinated and collaborative effort than before amongst Zimbabwe's people to deal with ongoing wildlife crimes that are threatening biodiversity conservation. Specifically, private sector tourism and safari operators providing safari services in the Parks and Wildlife Estate see the threat as not only undermining the conservation status of the PWMA Estate but the very resources upon which their businesses depend.

As the threat of poaching grows, the need for better and improved communication, collaboration and coordination has become increasingly apparent amongst various partners operating in Mana Pools National Park. This is essential if optimum efficiency and effectiveness in wildlife protection is to be achieved.

In the Zambezi Valley with its unique and aesthetic settings and abundance of wildlife, offers from the private sector to provide antipoaching support to PWMA have increased. However, careful thought needs to be given as to how best to harness this goodwill so that ZPWMA and the private sector can work together within a coordinated framework so as to achieve measurable success against wildlife crime.

Current trends in poaching in the Zambezi Valley have demanded that a facilitated workshop hosted by ZPWMA and attended by key stakeholders from the tourism, conservation agency, and relevant Government sectors specific to Mana Pools, to strategise on wildlife protection. .

The goal of the workshop is to *undertake detailed stakeholder and problem analyses from which a set of solutions and associated objectives can be developed leading to an action plan for implementation.*

ACCOMMODATION AT CHIRUNDU SAFARI LODGE

The Workshop Organisers will provide the participants' accommodation, 3 x meals per day, 2 x teas per day. Drinks are for participants' own account.

TRANSPORTATION:

- Would participants please make their own way to Chirundu Safari Lodge, on 30th March, 2015 to arrive no later than 1600hrs please.
- Thursday 2nd April: After breakfast, a Workshop working session until 1000hrs. Departure from 1000hrs onwards for Harare and other destinations through own transport arrangements.
- Please contact lynne@thetashingainitiative.org or 0772348671 with any further enquiries.

WORKSHOP:

The workshop will be held at Chirundu Safari Lodge, with workshop materials provided on site. Workshop will be facilitated by Dr David Cumming.

NB: PARTICIPATION!

Please respond by email to this invitation as soon as possible, clearly stating MANA POOLS WORKSHOP ATTENDANCE in your email subject line, thank you.

INVITATION

A COLLABORATIVE WORKSHOP HELD BY PARKS AND WILDLIFE MANAGEMENT AND PRIVATE SECTOR TO DEVELOP AN ANTIPOACHING STRATEGY FOR MANA POOLS NATIONAL PARK

Zimbabwe Parks and Wildlife Management authority cordially invites you to attend a Workshop

To travel to Chirundu Safari Lodge on 30th March, Workshop held on 31st March, and 1st April, and depart on 2nd April, 2015

at CHIRUNDU SAFARI LODGE

ZPWMA INVITEES: PLEASE RESPOND BY EMAIL OR BY COMPLETING THE ATTACHED FORM TO THIS INVITATION AS SOON AS POSSIBLE. PLEASE INDICATE YOUR REQUIRED MODE OF TRANSPORTATION FROM WHICH DEPARTURE POINT, I.E. MANA, CHEWORE, HARARE

RATIONALE:

There is need for a greater coordinated and collaborative effort than before amongst Zimbabwe's people to deal with ongoing wildlife crimes that are threatening biodiversity conservation. Specifically, private sector tourism and safari operators providing safari services in the Parks and Wildlife Estate see the threat as not only undermining the conservation status of the PWMA Estate but the very resources upon which their businesses depend.

As the threat of poaching grows, the need for better and improved communication, collaboration and coordination has become increasingly apparent amongst various partners operating in Mana Pools National Park. This is essential if optimum efficiency and effectiveness in wildlife protection is to be achieved.

In the Zambezi Valley with its unique and aesthetic settings and abundance of wildlife, offers from the private sector to provide antipoaching support to PWMA have increased. However, careful thought needs to be given as to how best to harness this goodwill so that ZPWMA and the private sector can work together within a coordinated framework so as to achieve measurable success against wildlife crime.

Current trends in poaching in the Zambezi Valley have demanded that a facilitated workshop hosted by ZPWMA and attended by key stakeholders from the tourism,

conservation agency, and relevant Government sectors specific to Mana Pools, to strategise on wildlife protection. .

The goal of the workshop is to *undertake detailed stakeholder and problem analyses from which a set of solutions and associated objectives can be developed leading to an action plan for implementation.*

ACCOMMODATION AT CHIRUNDU SAFARI LODGE

The Workshop Organisers will provide the participants' accommodation, 3 x meals per day, 2 x teas per day, plus a per diem for all PWMA personnel to cover drinks.

TRANSPORTATION

1. Transportation from Harare to Chirundu

    - Monday 30th March: Transportation for Participants from PWMA Head Office: For those who require transportation, the organisers are liaising with PWMA on Transport arrangements which will be advised. Participants should arrive at Chirundu Safari Lodge no later than 1600hrs.

    - Thursday 2nd April: After breakfast, departure time will be 1000hrs

2. Transportation from Chewore North and South, Mana Pools National Park and Marongora to Chirundu and return:

    - Fuel funds will be provided to Head Office and Regional Office, Chinhoyi.to assist in transport arrangements.

    - If there is a need for collection from field stations,, i.e. should PWMA vehicle not be available, please advise TTI - lynne@thetashingainitiative.org or 0772348671 by 20th March 2015.

WORKSHOP:

The workshop will be held at Chirundu Safari Lodge with workshop materials provided on site. The workshop will be facilitated by Dr David Cumming

NB: PARTICIPATION! A form is attached for your completion please

ATTENDANCE FORM & MAP

A COLLABORATIVE WORKSHOP HELD BY PARKS AND WILDLIFE MANAGEMENT AND PRIVATE SECTOR TO DEVELOP AN ANTIPOACHING STRATEGY FOR MANA POOLS NATIONAL PARK

To travel to venue on 30th March, Workshop held on 31st March, and 1st April, and depart on 2nd April, 2015

at CHIRUNDU SAFARI LODGE

ATTENDING: YES/NO? .....

NAME: .....RANK .....

I.D. : .....

STATION: .....

REQUIREMENT FOR TRANSPORT: Yes/No .....

FROM:.....

TO: .....

RETURN TRANSPORTATION REQUIRED: Yes/No.....

FROM: .....

TO: .....

Subject: FW: MIKE Trend Update 2014
From: "John J. Jackson, III" <jjw-no2@att.net>
Date: 3/11/2015 12:03 PM
To: Tim Vannorman <Tim_Vannorman@fws.gov>, Pamela_Hall@fws.gov, Bryan Arroyo - FWS <bryan_arroyo@fws.gov>, "Gnam, Rosemarie" <rosemarie_gnam@fws.gov>

FYI

CITES recently released a 2014 MIKE update. Please note that PIKE has declined and is below 0.5 for Eastern Africa, for the first time since 2010. PIKE was substantially reduced at the Ruaha-Rungwa site in Tanzania. PIKE is also below 0.5 in Southern Africa. Like Ruaha-Rungwa, the Chewore site in Zimbabwe was listed as a site "with a substantial reduction" in PIKE in 2014. The decline in illegal killings in Chewore results from the efforts of safari operators, as the Chewore MIKE site is a safari area.

Best,
John

--
John J. Jackson, III
CONSERVATION FORCE
3240 S. I-10 Service Road W., Suite 200
Metairie, Louisiana 70001
Tel: (504) 837-1233
Fax: (504) 837-1145
jjw-no@att.net
www.conservationforce.org

Attachments:

MIKE_trend_update_2014_new.pdf 216 KB

CONVENTION ON INTERNATIONAL TRADE IN
ENDANGERED SPECIESOF WILD FAUNA AND FLORA

Monitoring the Illegal Killing of Elephants

UPDATE ON ELEPHANT POACHING TRENDS IN AFRICA TO 31 DECEMBER 2014

Introduction

The CITES programme for Monitoring the Illegal Killing of Elephants, commonly known as MIKE, was established by the Conference of the Parties (CoP) at its 10th Meeting (Harare, 1997) in accordance with the provisions in Resolution Conf. 10.10 (Rev. CoP16) on *Trade in elephant specimens*. The MIKE Programme is managed by the CITES Secretariat under the supervision of the CITES Standing Committee. Since implementation began in 2001, the operation of the MIKE Programme in Africa has been possible thanks to the financial support of the European Union.

MIKE aims to inform and improve decision-making on elephants by measuring trends in levels of illegal killing of elephants, identifying factors associated with those trends, and building capacity for elephant management in range States. MIKE operates in a large sample of sites spread across elephant range in 30 countries in Africa and 13 countries in Asia. There are some 60 designated MIKE sites in Africa, which together hold an estimated 30 to 40% of the African elephant population, and 27 sites in Asia.

MIKE data is collected by law enforcement patrols and other means in designated MIKE sites. When an elephant carcass is found, site personnel try to establish the cause of death and other details, such as sex and age of the animal, status of ivory and stage of decomposition of the carcass. This information is recorded in standardized carcass forms, details of which are then submitted to the MIKE Programme. A database of more than 15,000 carcass records has been assembled so far, providing a substantial information base for statistical analysis.

MIKE evaluates relative poaching levels based on the Proportion of Illegally Killed Elephants (PIKE), which is calculated as the number of illegally killed elephants found divided by the total number of elephant carcasses encountered by patrols or other means, aggregated by year for each site. Coupled with estimates of population size and natural mortality rates, PIKE can be used to estimate numbers of elephants killed and absolute poaching rates.

While PIKE provides a sensitive measure of poaching trends, it may be affected by a number of potential biases related to data quality, carcass detection probabilities, variation in natural mortality rates and other factors, and hence results need to be interpreted with caution. However, the fact that the quantitative results presented below are in good agreement with quantitative information available from the Elephant Trade Information System (ETIS), as well as with qualitative information from the IUCN/SSC African elephant Specialist Group, gives confidence as to the robustness of the results.

Trend analysis 2014

Previous trend analyses of MIKE data using standardized methodology have been presented to the 15th and 16th Meetings of the Conference of the Parties to CITES; to the 61st, 62nd and 65th Meetings of the CITES Standing Committee, as well as to other meetings such as the African Elephant Summit (Gaborone, December 2013). In addition, analyses of MIKE data have been published in the peer-reviewed scientific literature (Burn et al. 2011; Wittemyer et al. 2014). Since the report submitted to the 65th Meeting of the Standing Committee (SC65), records for 1,440 carcasses found in 2014 were received from 46 sites in Africa.

The data set used for analysis consist of 13,511 records of elephant carcasses found between 2002 and the end of 2014 at 53 MIKE sites in 29 range States in Africa, representing a total of 488 site-years.

Figure 1 shows empirically derived time trends in PIKE at the continental level for reporting African MIKE sites, with 95% confidence intervals. The chart shows a steady increase in levels of illegal killing of elephants starting in 2006, peaking in 2011 and slightly declining and leveling off thereafter. The PIKE level in 2014 remained virtually unchanged compared to 2013.

Despite the slight decline since 2011, estimated poaching rates overall remain higher than the normal growth rate of elephant populations. Therefore, the elephant population at MIKE sites overall is likely to have continued to decline in 2014. In some areas, a decline in PIKE may be the result of a substantial decline in the elephant population, making it more difficult for poachers to find suitable targets in such areas. However, without recent and reliable elephant population estimates from such areas, it is difficult to verify the impact of poaching on such populations.

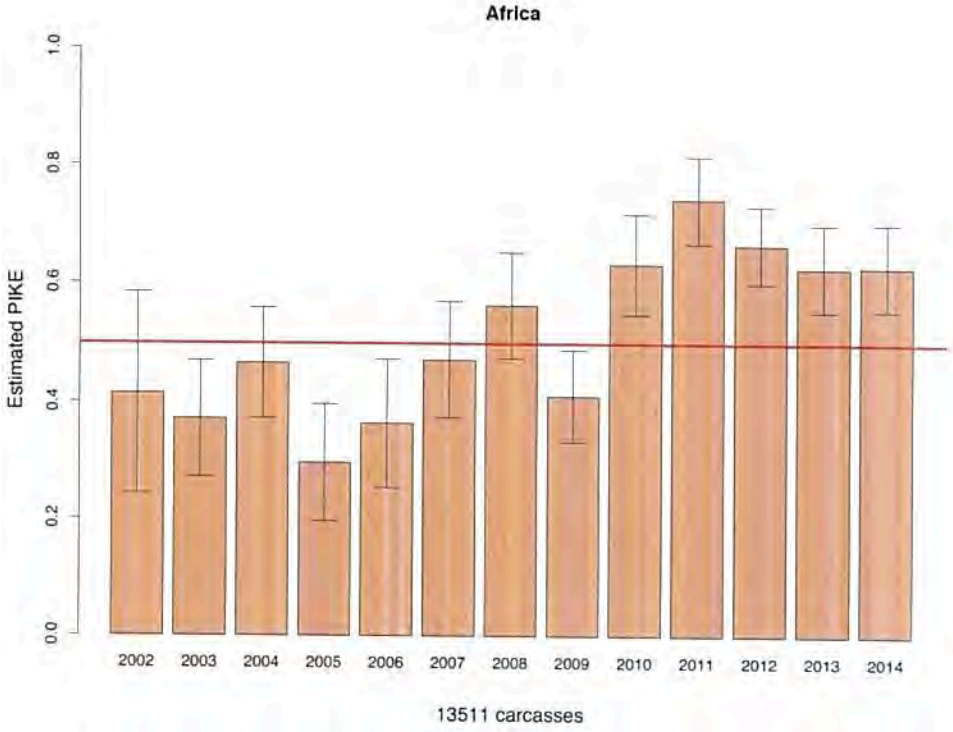


Figure 1. PIKE trends in Africa with 95 % confidence intervals. PIKE levels above the horizontal line at 0.5 (i.e. where half of dead elephants found are deemed to have been illegally killed) are likely to be unsustainable. The number of carcasses on which the chart is based is shown at the bottom of the figure.)

It is also difficult to estimate poaching impact at the site level, especially in sites that do not have sufficiently large carcass sample sizes, or where there may be indications of bias in reported PIKE levels. Among sites that have reported 20 or more carcasses in 2014, where the site-level PIKE can be taken to be relatively reliable, those that remain of particular concern (with a PIKE level of 0.7 or higher) in 2014 include Bangassou (Central African Republic); Garamba (Democratic Republic of the Congo); Niassa (Mozambique); Pendjari (Benin); and Selous-Mikumi (United Republic of Tanzania). On the other hand, substantial declines in PIKE in 2014 have been reported in Caprivi (Namibia); Chewore (Zimbabwe); Meru and Samburu Laikipia (Kenya); Ruaha-Rungwa (United Republic of Tanzania); and South Luangwa (Zambia).

The stability in PIKE levels in the last two years is also reflected at the subregional level, although there are differences between the subregions (Figure 2). The downward trend since 2011 in Central Africa was broken in 2014 with a slight (but not statistically significant) increase over 2013. The downward trend did continue in Eastern Africa, although the PIKE value in 2014 is not significantly different from the value recorded in 2013. It is nevertheless worth noting that, for the first time since 2010, the PIKE level in Eastern Africa in 2014 was below 0.5. In Southern Africa, PIKE in 2014 remained very similar to the levels recorded in 2012 and 2013. The only subregion where a substantial increase in PIKE was recorded in 2014 was West Africa, but the

paucity of carcass data from that subregion continue to make inferences on trends unreliable. However, it is worth pointing out that the value of PIKE for West Africa in 2014 is the highest ever recorded in that subregion.

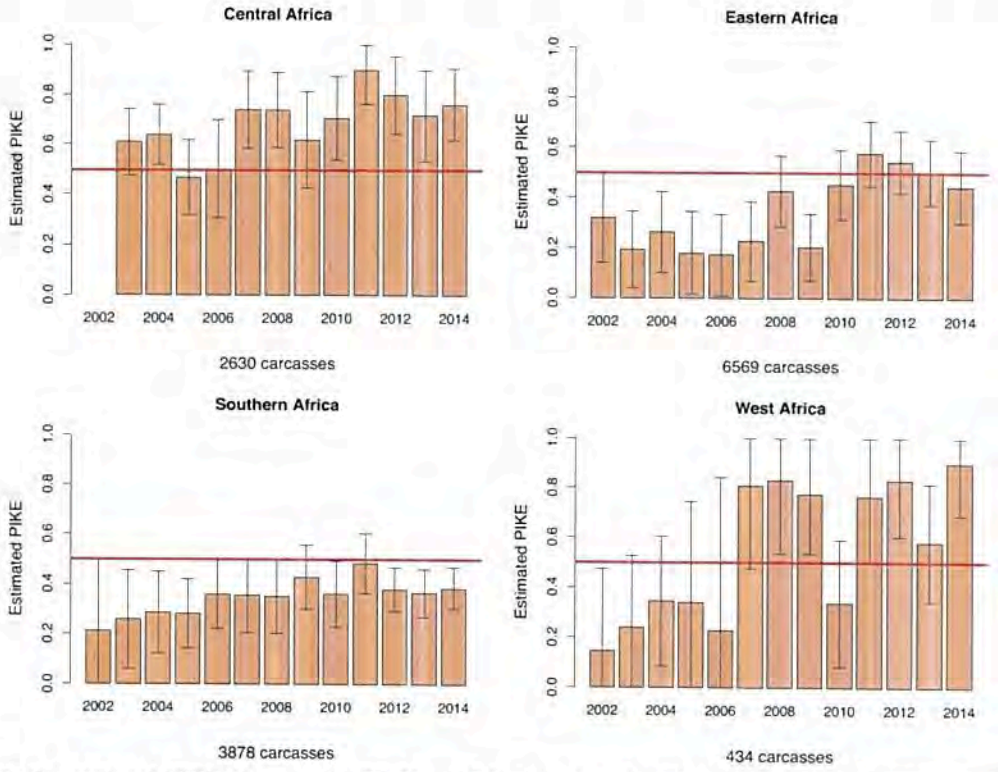


Figure 2. Subregional PIKE trends with 95 % confidence intervals. The numbers of carcasses on which the graphs are based are shown at the bottom of each graph.

In conclusion, while poaching levels seem to be stabilizing across MIKE sites, they remain above the likely sustainability threshold, especially in Central and West Africa, but also in specific sites in Eastern and Southern Africa.

References

Burn, R.W., Underwood, F.M. & Blanc, J., 2011. Global trends and factors associated with the illegal killing of elephants: a hierarchical Bayesian analysis of carcass encounter data. *PLoS ONE*, 6(9), p.e24165.

Wittemyer, G. et al., 2014. Illegal killing for ivory drives global decline in African elephants. *Proceedings of the National Academy of Sciences*, 111(36), pp.13117–13121.

United States Department of the Interior

FISH AND WILDLIFE SERVICE
Washington, D.C. 20240

In Reply Refer To:
FWS/AIA/DMA

Memorandum

To: The File

From: Chief, Branch of Permits

Date: MAR 26 2015

Subject: Enhancement Finding for African Elephants Taken as Sport-hunted Trophies in Zimbabwe On or After January 1, 2015.

The African Elephant (*Loxodonta africana*) is listed as threatened under the U.S. Endangered Species Act (ESA) and is regulated under an ESA section 4(d) special rule [50 CFR 17.40(e)]. The 4(d) special rule gives the requirements for the import of sport-hunted trophies. Under paragraph 17.40(e)(3)(iii)(C), in order for the U.S. Fish and Wildlife Service (Service) to authorize the import of a sport-hunted elephant trophy, the Service must make a finding that the killing of the animal whose trophy is intended for import would enhance the survival of the species in the wild. In evaluating the available data on elephant hunting in Zimbabwe, the Service has determined that it is unable to make a finding that the killing of elephants in Zimbabwe, on or after January 1, 2015, whose trophies are intended for importation into the United States, would enhance the survival of the African elephant in the wild. Therefore, the trophies, part or products, of elephants taken in Zimbabwe during the 2015 hunting season and future hunting seasons, will not be allowed to be imported into the United States. The suspension on importation of trophies taken during calendar year 2015 or future hunting seasons 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.

General considerations:

As stated in previous findings, in evaluating whether the killing of the animal whose sport-hunted trophy is intended for import into the United States contributes to the enhancement of African elephants within a country, the Service looks at a number of factors. We evaluate whether a country has a valid national or regional management plan and if the country has the resources and political will to enact the plan. If there is a plan, what government entities

implement the plan and how often is it reviewed and updated? Does the plan have clear, achievable objectives? Are the objectives measurable and are they being achieved? Is there an adaptive management approach within the plan so that enacting agencies can quickly respond to changing environmental or social issues?

The Service also evaluates the status of the elephant population within a country and trends over time. Particularly, we are interested in population numbers, sex and age-class distribution, and mortality rates (both natural and human-induced). Are standardized surveys being conducted and, if so, what are the timing, census methodology, and coverage? Since elephant populations can move across international borders, what level of cooperation is there between neighboring countries in management and surveying efforts for shared populations? How is poaching accounted for within survey efforts?

The Service takes into account all forms of offtake when evaluating population viability and sustainability, including human-elephant conflicts, problem animal control, poaching, and sport-hunting. While recognizing that there may be limited resources available for elephant management, the Service considers what national policies are in place to address human-elephant conflicts and problem elephant control. Is there a policy on culling surplus animals and removal of nuisance animals? Does domestic harvesting of elephants occur for local consumption or use? The amount of protected area either set aside for elephants or managed for elephant populations and the level of protection provided are also important in the Service's evaluation of whether imports of trophies could be authorized.

Finally, the Service considers the country's sport-hunting program and whether it contributes to the conservation and management of the species. Is the hunting program scientifically based and has it been incorporated into national/regional management strategies, particularly in light of data on population numbers and trends and levels of utilization (both legal and illegal)? Are the funds generated by hunters going directly to in-situ conservation and management efforts or deposited into a general treasury fund? How are hunting quotas distributed? If there are concession areas, how are they managed and allocated? Do U.S. hunters, through their participation in the hunting program, contribute sufficient funds to address management needs of the species, and are those funds utilized in a meaningful manner?

In short, the Service is looking to determine if a country has sufficient numbers of elephants to support a hunting program, if the country has a management plan and adequate laws and regulations to effectively implement a hunting program, and if the participation of U.S. hunters in the program provides a clear benefit to the species to meet the requirements for the import of sport-hunted trophies under paragraph 17.40(e)(3)(iii)(C).

Basis for Finding for Zimbabwe:

In the April 4, 2014, finding, and the revised finding of April 17, 2014, the Service stated that it was unable to make a positive finding to allow imports, primarily due to the limited information available to the Service at that time. On April 4, 2014, the Fish and Wildlife Service sent a letter

to the Zimbabwe Parks & Wildlife Management Authority (ZPWMA) with a series of questions that would assist the Service in making a final determination on trophy imports. On April 14, 2014, the Director-General of ZPWMA sent a letter to the Service expressing concerns over our decision to establish a temporary suspension. On April 17, 2014, the Director-General sent a response to the Service inquiry. Several weeks later, the Service received a number of documents, including copies of Zimbabwean laws, and other items referenced in the ZPWMA response. In addition, on June 6, 2014, the Service received additional information from Conservation Force, a U.S.-based conservation and hunting non-governmental organization (NGO). In its July 17, 2014 finding, as revised on July 22, 2014, the Service stated that it continued to be unable to make a positive finding to allow imports. Since that time, the Service has received a number of comments from individuals and associations connected to the hunting industry in Zimbabwe or southern Africa. On October 21, 2014, the Service received additional comments from Conservation Force. Further information was provided by Conservation Force on January 19, 2015. After reviewing this information, the Service delivered a second letter, dated October 31, 2014, to ZPWMA while attending the 13th Annual African Wildlife Consultative Forum in Ethiopia. This letter requested clarification of information submitted to the Service, and also requested additional information to address questions that were raised from our review of available information. The Service received a response to this inquiry on December 10, 2014. Safari Club International also provided supplemental information on December 17, 2014, and January 23, 2015. This finding is the result of an analysis of all of this information. Based on the information available to the Service, we are unable to make a finding that the killing of elephants in Zimbabwe, on or after January 1, 2015, whose trophies are intended for importation into the United States, would enhance the survival of the African elephant in the wild. As noted above, the suspension on importation of trophies taken during calendar year 2015 or future hunting seasons could be lifted if additional information on the status and management of elephants in Zimbabwe becomes available which satisfies the conditions of the 4(d) special rule under the ESA.

Management Plans: In its April 4, 2014, letter, the Service asked whether Zimbabwe had a current national management plan for elephants. In the ZPWMA response, Zimbabwe responded that the "management plan" consisted primarily of The Policy and Plan for Elephant Management in Zimbabwe (1997) and Elephant Management in Zimbabwe, third edition (July 1996). In addition, ZPWMA stated that they also implement other plans: "The African Elephant Action Plan" (CoP15 Inf. 68), SADC Protocol on Wildlife, and Elephant and Rhino Security Plan. In the ZPWMA response, ZPWMA stated that all of the protected areas in Zimbabwe have "specific aspects of elephant monitoring programs that are implemented and reviewed on an annual basis". ZPWMA stated that information on the status of the elephant is derived from aerial surveys, water hole counts, walking transects, visitor observation, and ranger-based monitoring. In addition, ZPWMA stated that they are regularly monitoring the status of the elephant population, including poaching, at two sites through the CITES "Monitoring the Illegal Killing of Elephants" (MIKE) program.

According to their initial response, ZPWMA is the sole legal authority, under the terms of the Parks and Wildlife Act, Chapter 20:14, for administering the management plans and overall

management of elephants in Zimbabwe. Through an adaptive management approach, ZPWMA stated that aspects of the elephant management plan are "reviewed through annual stakeholder consultative national workshops" with government, NGO, local community, safari operator, and private sector participation.

Elephant Management in Zimbabwe provides a historical review of elephant status in Zimbabwe prior to 1996. The document also identifies three major management goals for ZPWMA: maintain at least four demographically and genetically viable populations; maintain numbers and densities below levels that will not compromise biodiversity; and maintain or increase elephant range at or above 1996 levels. However, the document primarily focuses on intentional reduction of elephant populations through culling rather than on maintenance or increase of populations under threat. While the Service recognizes the potential role of culling as part of a management program, Elephant Management in Zimbabwe is largely irrelevant since it does not establish specific measurables or management actions that need to be taken. Instead, it largely presents a philosophical discussion of the merits of culling and efforts that must be taken to ensure that culls meet the desired management results. The document did make one relevant statement that when managing elephant males for sport hunting, it is essential to account for all adult males removed from a population, including animals taken through problem animal control and poaching. The document goes on to state that the "sport hunting quota should be reduced, to zero if necessary, if more than 0.75% of the populations [per annum] is being killed in other ways."

The Policy and Plan for Elephant Management in Zimbabwe was the outcome of a "Zimbabwe Elephant Management Framework" workshop held on January 13, 1997, in Harare. The document summarizes the issues that were affecting elephant populations in Zimbabwe at the time, and recommended policy statements on elephant management. While the document states a clear goal and establishes ten objectives with management actions identified, it does not sufficiently expand on any methodology to meet the objectives or complete management actions. Without a plan to take specific actions to meet the objectives, or at least a clear framework on how adaptive management efforts would be monitored to ensure that they are meeting the stated objectives, it is not clear to the Service how this document could serve as a "management plan". Given the general nature of the stated objectives, it could be stated that the objectives and, possibly, the management actions of this 1997 document are still valid, but without specific measurable outcomes identified to implement these goals and actions, the document is insufficient to address the management of elephants. Further, while the material received from Conservation Force and the ZPWMA in response to the Service's April 4, 2014, and October 31, 2014, inquiries provided some information related to the objectives, the Service has not received sufficient information to indicate, since the inception of this document in 1997, which objectives are being met or how they are being met.

Other documents provided by ZPWMA in response to our inquiries, e.g. "The African Elephant Action Plan" (CoP15 Inf. 68), SADC Protocol on Wildlife, and Elephant and Rhino Security Plan also establish broad policy goals and objectives, but provide very little with regard to specific management actions or measurables. At a December 2014, three-day workshop, hosted by ZPWMA, to review Zimbabwe's Elephant Conservation Policy and Management Plan, the participants discussed the SADC Protocol, which went into effect in 2003. According to the

information from this workshop, the participants felt that the protocol was a good framework for Southern African countries to work together on law enforcement and anti-poaching efforts. It is not clear, however, how successful Zimbabwe has been in implementing this protocol (limited information has been provided supporting or refuting Zimbabwe's implementation of the Plan). The Zimbabwe Policy for Wild Life is a general framework, published in November 2000, on how ZPWMA would be managed to ensure that Zimbabwe's wildlife and their habitats are appropriately managed. This document specifically acknowledges that "[I]t is intended that [this] policy will be followed by detailed management plans and enabling legislation for those issues which merit them." It is not clear if detailed management plans for elephants have not been developed because ZPWMA does not believe that elephants merit such plans, or if detailed plans have been developed, but were not provided to the Service.

Finally, the National Environmental Policy and Strategies, published in June 2009, is a general policy framework for all environmental issues in Zimbabwe. The document, while addressing ways to maintain environmental integrity, social issues, economic issues, and environmental management, establishes "guiding principles" and "strategic directions" for addressing biodiversity (Guiding Principle #9 and 10), flora (#11 and 12), fauna (#13), genetic resources (#14), protected areas(#15), natural resource management (#43), and wildlife and fisheries (#45). However, these guiding principles and corresponding strategic directions are only broad guidance and do not identify any specific management activities.

Without a management plan or plans, or other guiding document, with specific, measurable goals and actions, it is very difficult for the Service to determine if ZPWMA is implementing the well-articulated, but general, goals and objectives that appear in Elephant Management in Zimbabwe, The Policy and Plan for Elephant Management in Zimbabwe, and other Zimbabwean policy documents. It should also be noted that both elephant management plans are more than 15 years old.

In several documents available to the Service, ZPWMA stated that they do not have a proscriptive management plan because they utilize an adaptive management approach to elephant conservation and management. However, no information has been provided that indicates how this adaptive management approach is carried out. While the Service acknowledges the value of such an approach generally, a clear framework or guidance would be necessary to ensure consistent implementation on a national basis. Even if the documents mentioned above were the overarching guidance for the country and adaptive management was carried out independently for each of the four subpopulations (North West Matabeleland, Zambezi Valley, Sebungwe, and Gonarezhou (or South-East Lowveld)), it would stand to reason that each subpopulation would need guidance that is more specific. In both of the ZPWMA responses to the Service, they spoke of "devolving wildlife management authority to local branches, private conservancies, and CAMPFIRE's RDC [rural development councils]". The Service does not disagree with a regional or local management approach, however, since the Service has been informed that elephants in Zimbabwe are managed at a national level, there needs to be a national approach and understanding of the basis of this adaptive management and that the country, as a whole, is taking a logical, scientifically based approach to reaching the agreed upon end result.

In December 2014, ZPWMA hosted a three-day workshop at Hwange Safari Lodge in Zimbabwe to review Zimbabwe's Elephant Conservation Policy and Management Plan. The workshop was attended by the ZPWMA Director General, the Permanent Secretary for Environment, Water and Climate, members of the Zimbabwe Parks and Wildlife Board, Executive Directors of Rural District Councils, and various NGOs. Both the Permanent Secretary and the Director General acknowledged at the workshop that the 1997 management plan was outdated and has been overtaken by events at the global, regional, and local level and cannot address current challenges.

The workshop participants agreed on a framework for the upcoming management plan. The proposed revised management plan has the same long-term vision of the 1997 plan and basically the same target goals (i.e., maintain at least 4 demographically and genetically viable populations; maintain or increase elephant range; maintain numbers/densities of elephants at levels that do not adversely impact biodiversity conservation goals while contributing to economically viable and sustainable wildlife-based land uses). The workshop participants identified the beginnings of strategic objectives and outputs, as well as some key activities. The outcome of the workshop appears to be a starting point for reevaluating the current management plan(s). However, according to the Proceedings, there was insufficient time at the workshop to complete the section on means of verifying the key performance indicators. A schedule was agreed upon: by Dec. 15, 2014, ZPWMA would appoint a drafting team to write up the management plan; the 1st draft of the plan would be ready by Jan. 30, 2015; the Elephant Management Plan Coordinating Committee would be convened by ZPWMA by Feb. 28, 2015; Final draft of management plan by April 30, 2015; and Operational annual management plans for 4 sub-regions by May 30, 2015.

Overall, ZPWMA has not provided, and the Service has not otherwise received, any information regarding the 2014 or future hunting seasons that indicates that Zimbabwe is implementing appropriate management of the national elephant population. While the Service does not have adequate information to conclude that the current management regime is sufficient to meet the criteria under 50 CFR 17.40(e)(3)(iii)(C), a revised national plan that includes specific goals and measures with specific actions to be taken is a necessary first step towards a re-evaluation of this finding in the future.

Population Status: To manage any population to ensure an appropriate population level and determine whether sport-hunting is having a positive effect, it is vital to have sufficient data on population numbers and population trends to base management decisions. Elephant Management in Zimbabwe states that sport-hunting quotas should be reduced or eliminated if the overall offtake of male elephants, from all sources, is greater than 0.75% of the total population per annum. Without current population data, it is not clear how one can calculate the number to offtake. Without information on population demography and mortality, it is not possible to determine accurately what impact hunting, in conjunction with other offtakes, including problem animal control and poaching, is having on Zimbabwe's elephant population. However, Rowan Martin, author of this document, stated in comments submitted to the Service that he wished he could "disavow one's own writing". Dr. Martin stated that "It [the document] is correct in saying that close attention should be paid to problem animal control and illegal hunting…[but] my current thinking is that trophy hunting should continue regardless and the management thrust should be on reducing illegal hunting and problem animal control. A well-functioning trophy hunting industry

could be the one factor that reduces number of elephants killed illegally and as problem animals." While the Service agrees that a well-functioning hunting industry can provide financial benefits, we also believe that a clear understanding of all off-take is necessary and hunting should not continue without adequate population data.

At the time the Service made its April and July 2014 findings, we relied heavily on population information in the IUCN SSC African Elephant Database report "2013 Africa". According to this this report, the elephant population in Zimbabwe in 2007 was estimated to be 99,107, of which 85% (84,416) was classified as "definite", although less than 1% of these animals were identified by aerial or direct counts, and only 0.3% (291) was classified as "speculative". While the total population in 2012 was estimated at 100,291, only 47% (47,366) was classified as "definite" and 45% (45,375) was classified as "speculative". Only 304 "definite" animals were counted by aerial or ground counts (less than 1% of the definite animals), while 41,840 of these animals were counted through sample counts or dung counts, a less accurate methodology than properly conducted aerial surveys, and the remaining 5,222 were estimated through "other guesses". According to this report, 23 of 40 population estimates included in 2012 are older than 10 years, undermining the quality of the data. Further, according to the report, only eight of the 40 estimates used in the "2013 Africa" report were the result of repeated surveys. As noted in that report, "this lack of systematic and updated monitoring data is of serious concern for possibly the third largest elephant population in Africa." However, in a November 3, 2014, letter to the Service, the IUCN/SSC African Elephant Special Group stated that data had been inadvertently left out of the 2013 provisional report. Specifically, a 2007 survey of Hwange National Park was left off, although it was recorded under "New Surveys" on their website. The results of this survey would have added an additional 30,000 elephants to the "definite" category (from the "speculative" category), while not changing the overall population estimate. Nonetheless, the majority of surveys that contributed to the overall population estimate of 100,291 were more than 10 years old. Given the current circumstances in Zimbabwe and across the continent (e.g., poaching, habitat loss, human population expansion), this information is outdated and cannot be relied upon to show the current status of elephants.

In 2012-2013, according to information provided by ZPWMA, two surveys were conducted in Save Valley Conservancy and in Gonarezhou National Park (and surrounding areas). In Aerial Survey of the Larger Herbivores, Save Valley Conservancy, Zimbabwe, a report compiled in September 2013 by the Technical Advisory Committee of the Save Valley Conservancy, 1,538 elephants were counted. Based on nine years of aerial surveys (2004-2010 and 2012-2013), not all of which covered all of the Save Valley Conservancy, there does appear to be a short-term increase in elephant population density of 9.5%. However, trend analysis of the last three aerial surveys indicated only a 2.2% population increase in elephants. Further, the 2012-2013 surveys were only partial surveys and conditions were such that some double counting may have occurred.

In October 2013, additional aerial surveys were conducted in Gonarezhou National Park, Malapati Safari Area, and adjacent communal lands. From these surveys, it was estimated that there were 10,151 elephants in the Gonarezhou National Park area, the highest estimate since sample surveys began there in 1975. The estimated total number of elephant carcasses in the entire survey was 513. The "1+2" carcass ratio (fresh carcasses (category 1) and recent carcasses (category 2)),

however, was 0.39% in the entire survey area. The Service recognizes that the apparent elephant population increase in Gonarezhou National Park is excellent news. However, a carcass ratio of less than 4%, which is the expected carcass level due to natural mortality alone, is low. This low number could be an indication that the aerial survey method did not accurately detect all carcasses.

In 2014, the Pan African Aerial Elephant Survey (http://www.greatelephantcensus.com/) was carried out over a significant portion of the elephant's range in Africa. Preliminary results from the Pan African survey report a provisional estimate for elephant abundance in Zimbabwe to be between 82,000 and 83,000 individuals. This represents a 6% decline since 2001 surveys. This decline in elephant abundance is important when compared to 5% increase in elephant abundance per annum during the time period immediately prior to the 2001 survey. This overall downward decline in elephant abundance in Zimbabwe is troubling, as an example if elephant abundance in Zimbabwe was predicted to be 99,107 in 2007 and had a constant growth rate of 5% per annum, the Zimbabwe population would be predicted to exceed 139,454 by 2014.

Figures presented at the 16th Meeting of the Conference of the Parties to the Convention on International Trade in Endangered Species of Wild Fauna and Flora in Bangkok, Thailand, March 3-14, 2013 (CoP16 Doc. 53.1) indicated that, during 2002 – 2010, the percentage of illegally killed elephants (PIKE) in the Chewore area (Mana Pools and Chewore Safari Park) Zimbabwe was circa .24, whereas in 2011 that number jumped to .67. A PIKE level of 0.5 or higher (half or more of all carcasses were the result of illegally killed elephants) means that the elephant population is very likely to be in net decline. At the 65th meeting of the Standing Committee, updated PIKE data were provided for Zimbabwe (SC65 Inf.1). PIKE numbers from the two MIKE sites in Zimbabwe showed an increase in 2012 to 0.79 (out of 43 carcasses found) and 0.27 (out of 52 carcasses found). In 2013, the PIKE rates reported for the same two sites were 0.4 (91 carcasses found) and 0.22 (36 carcasses found). From these data, it appears that there was an increase in elephant poaching in 2012, but the poaching level might have declined in 2013 to below the 2011 level. According to the preliminary results from the Pan African Aerial Survey, carcass counts in Mid Zambezi Valley were estimated at 553 (4.3% of live population); Sebungwe had an estimated 1,424 (28.2%). North West Matabeleland was estimated at 4,087 (7.6%) and Gonarezhou National Park at 523 (4.6%) carcasses. There are no estimates available as to the proportion of these carcasses that were the result of poaching.

Regulations and Enforcement: The regulatory mechanisms for ZPWMA and its programs have been established under the Parks and Wild Life Act. This law includes sections on virtually every aspect of ZPWMA, including requirements for annual financial audits and reporting to the central government. The law also provides for substantial penalties for the unlawful possession of or trading in ivory. The first offense carries a minimum of 5 years and a maximum of 15 years in prison. The second offense carries a minimum prison term of 7 years and a maximum of 15 years. However, according to the response from ZPWMA to our April 4, 2014, inquiry, the General Laws Amendment Act (No. 5) of 2010 provides for a mandatory imprisonment of not less than nine years for poaching. If properly enforced, it appears these penalties would be a sufficient deterrent to poaching. However, we did not receive any information on the number of poaching crimes that are prosecuted nor the average sentence or penalty.

In January 1996, the Government of Zimbabwe approved the establishment of the Parks and Wild Life Conservation Fund, a statutory "Fund" that provides for financing wildlife operations directly from revenues generated through wildlife related activities. However, only revenues generated through sport-hunting conducted on state and private lands are used to finance ZPWMA; to our knowledge, no other government funding is provided, and only limited outside funding from NGOs or other governments appears to be available. The 1997 CITES Panel of Experts raised concerns as to the status of ZPWMA relating to its weak financial base, lack of management skills, inadequate and old equipment, and poor infrastructure. While the concerns raised by the Panel of Experts are dated, no new information was provided by ZPWMA or other sources regarding these concerns in response to the Service's April 4, 2014, inquiry.

Based on their December 10, 2014, letter, ZPWMA has a current operating budget in excess of US$28 million. In 2013, ZPWMA reported having revenues of US$29 million against expenditures of US$26 million. According to the letter, "...except for activities like game water supplies in Hwange NP and aerial surveys, there is no budget specifically to manage elephant because ZimParks takes a holistic approach to conservation of all wildlife resources including elephants." ZPWMA also stated that elephant hunting contributes in excess of US$14 million annually and that approximately 30% of ZPWMA's revenue is from hunting, of which the elephant is the major contributor. Besides these statements, however, we do not have adequate information about how much money is generated by elephant hunting, how these funds are distributed, or how these funds impact the ability of ZPWMA to adequately enforce the Parks and Wild Life Act, day-to-day management, or anti-poaching efforts.

That being stated, the Service received documents written by Rowan B. Martin entitled "Ban on Import of Elephant Trophies into the USA from Tanzania and Zimbabwe: Costs of Protection of Elephant Areas." The undated documents discussed the budget requirements for protecting wildlife areas in Zimbabwe based on calculations developed by Mr. Martin in 1996 and 2004. The documents stated that for Zimbabwe, given the total elephant range within the areas controlled by ZPWMA, the annual budget required to protect the elephant range would be US$21 million. In 2013, ZPWMA requested $28 million from the Treasury, the major part of which was intended for anti-poaching efforts. They were allocated only $1.5 million. According to Martin, this amount, along with the revenue from trophy hunting licenses, is not sufficient to provide the needed level of protection for land under ZPWMA's authority. However, in their December 10, 2014, letter, ZPWMA stated that they did not accept Dr. Martin's evaluation and did not consider it accurate. Dr. Martin also presented at the December workshop on this issue. According to the proceedings from the workshop, Dr. Martin suggested that ZPWMA would need US$5,275,480 to protect the National Parks, US$7,055,268 to protect safari areas, and US$3,891,536 for forest areas annually. In addition, communal lands would need US$6,101,101 and private land $3,826,770. Since we have not received a communication from ZPWMA since their December 10, 2014, letter, it is unclear if they agree or disagree with these numbers.

In evaluating the resources available to ZPWMA and their ability to implement regulations and enforcement, we also considered documents from recent Meetings of the Conference of the Parties to CITES. At the 15th Meeting of the Conference of the Parties to CITES, a report on the Elephant Trade Information System (ETIS) was presented (CoP15 Doc. 44.1 Annex). In the report,

Zimbabwe was specifically identified with regard to illicit ivory trade. The report noted the existence of organized criminal activities within Zimbabwe, including reports of the involvement of politicians, military personnel, and Chinese nationals in illicit wildlife trade. The report goes on to state that the law enforcement effort ratio within the countries grouped for the analysis had dropped to 40%, a decline of 4% from the CoP14 analysis. This decline indicates a less than average performance and was attributed to the situation in Zimbabwe.

At the 16th Meeting of the Conference of the Parties to CITES, the report on ETIS (CoP16 Doc. 53.2.2) expressed concerns about Zimbabwe with regard to illegal trade in ivory. The report stated that, as a group, Zimbabwe, Botswana, and Namibia were in the middle range, when compared to 64 other consumer or producer countries of elephant ivory, in terms of the mean number of seizures identified, but ranked fifth in the measure of scale, indicating that most of the seizures were in the 10-100 kg class (i.e., an average number of seizures that were predominately smaller in size). The report noted that 65% of the ivory trade between 2006 and 2011 had occurred since 2009, indicating that illegal ivory trade is increasing. Governance indicators were mixed, with a much lower than average World Bank "rule of law" score, but the second highest law enforcement ratio of any group of countries evaluated. The report, however, supports the Service's governance concerns by specifically identifying Zimbabwe as pulling these scores down in both cases, "especially in the 'rule of law' score, indicating that far greater challenges exist in that country." The report also noted that Zimbabwe was the source of nearly two tons of worked ivory seized in Cape Town, South Africa, in 2009.

In several letters sent to the Service by Zimbabwean safari outfitters and hunting guide organizations, it was stated many times that the presence of hunters, specifically U.S. hunters since they appear to make up the vast majority of sport-hunters in Zimbabwe, and subsequently the professional hunters and safari outfitters guiding the hunters, are the major deterrent to poaching in Zimbabwe. Several specific incidents were reported where safari outfitters and hunters, and not the ZPWMA rangers, thwarted poachers. In at least one incident, the 2013 Hwange National Park poisoning, it was reported that the safari outfitter paid for all of the anti-poaching efforts, including paying for all transportation for the ZPWMA rangers and feeding them. We would expect that the presence of anyone in the field, particularly armed hunters, could deter poachers from carrying out illegal activities where the likelihood of being captured is heightened. However, no evidence was presented to the Service that supports the belief that, without hunters, specifically U.S. elephant hunters, poaching in Zimbabwe would significantly increase. Based on the information provided, we believe that it is not likely that legal hunting for elephants or other wildlife is widespread enough or at a high enough density level to reduce significantly poaching levels in and of itself. This is particularly true for national parks, where hunting is not allowed.

Various statements about trophy hunters and outfitters being a major deterrent to poaching raise concern about existing ZPWMA funding levels and funding utilization. First, concerns center on the ability of ZPWMA to generate sufficient funds to support adequately their stated mission. Secondly, there is concern about ZPWMA's ability to utilize existing funding to support on-going activities. Without additional information on ZPWMA's funding sources (or income) and operating expenses, the Service is unable to determine if Zimbabwe has adequate resources to

enforce existing laws and regulations.

Even with the revised December 10, 2014, information regarding the current ZPWMA budget, we continue to lack sufficient information regarding funding levels or any indication that the financial base, management skills, equipment, or infrastructure have improved. It is possible, of course, that recent and upcoming events, such as the Hwange meeting in December 2014 and other meetings scheduled for early 2015, may lead to a clearer understanding of funding levels and the utilization of ZPWMA revenue. As noted previously, the Service can re-evaluate this finding, and the suspension on importation of trophies taken during calendar year 2015 or future hunting seasons could be lifted, if additional information on the status and management of elephants in Zimbabwe becomes available which satisfies the conditions of the 4(d) special rule under the ESA.

Sustainable Use: We have not been provided with adequate information regarding offtake in Zimbabwe, including basic fundamental information like the number of elephants that have been sport-hunted annually and the number of elephants that have been legally killed for the hide trade. For both the 2014 and 2015 hunting seasons (January – December), Zimbabwe has established an annual export quota of 500 elephants (1000 tusks). This is the same quota that Zimbabwe has reported to the CITES Secretariat since 2004. According to available information, it does not appear that Zimbabwe actually fills this quota each year, but due to variation in how trophies are categorized in CITES trade data, it is difficult to categorically identify the actual numbers of hunted elephants that are exported each year. Information provided by ZPWMA in response to our April 4, 2014, inquiry did not identify the number of trophies exported annually. Several statements from safari outfitters indicated that approximately 160 elephants are taken annually, but this number is not supported by any documentation.

ZPWMA categorizes offtake into six categories: Cropping (hunting and population control, which may include meat supply to rural communities and live animals to breeders), Natural Mortality (found dead of natural causes), Accidents (killed by trains, landmines, or vehicles), Poaching (illegal take), Problem Animals (elephants killed to protect human life and property), and Management Offtake (offtake due to other management decisions). No information was given on the number of elephants that are taken in each of these categories. It does not appear that Zimbabwe is currently conducting any culling operations, besides trophy hunting if considered a "cull".

According to information from ZPWMA, 293 elephants were poached in 2013, including the 105 elephants poisoned in Hwange National Park.[1] Of the five years of data ZPWMA provided in their April 17, 2014, response, an average of 190 elephants were identified as being poached annually. In 2009 and 2010, there was an average of 111 elephants poached; however, between 2011 and 2013, the average more than doubled to 243 elephants. It is not clear what stimulated this significant increase. Many countries have experienced a marked increase in poaching, due to the increase in demand for ivory. It is also possible that shifts in land tenure, governance,

[1] In our April 4, 2014, finding, we incorrectly stated that over 300 elephants had been poisoned.

ZPWMA's limited financial resources, or economic factors contributed to the increase. Further, while the number of animals poached in Zimbabwe does not appear to be as high as in other countries, information that was presented at CoP16 (CoP16 Doc. 53.1) indicates that there has been a steep rise in poaching incidents. Without more definitive population data, like what should come from the Pan African Aerial Elephant Survey when all of the data are released, there is no way to determine whether these numbers, combined with other offtake, are sustainable.

While the number of elephants taken as problem animals was not elucidated in material provided by ZPWMA in April 2014, it appears, based on their response and documentation provided by Conservation Force, that a large number of elephants are taken each year. ZPWMA reported that in a 3-year period (2009-2011), there were 372 human-elephant conflict cases for four "hot spot" districts. It is not clear if elephants were removed in each of these cases. However, the Service has anecdotal evidence suggesting that the number of problem animals may equal or exceed the number of elephants taken through sport-hunting.

The December 10, 2014, letter from ZPWMA, however, included some further information on off-takes. According to this letter, the percentage breakdown of all off-takes was as follows: 5% from problem animal control, 55-60% from hunting, and 35% from poaching and natural mortality. While specific numbers were not provided, the letter also stated that an average of 40 elephants was taken annually as problem animals. Therefore, if these percentages are correct, hunting off-take would be 440-480 animals, and poaching/natural mortality would be approximately 280 animals. However, the December letter also stated that management offtake (culling, training exercise, and meat production for park staff) was approximately 95 elephants annually. Based on these numbers and with a reported 3-year average of 180 elephants taken annually due to poaching (the 2013 Hwange incident of 105 elephants being poisoned was not included in this average), the natural mortality of elephants in Zimbabwe is approximately 100 animals/year or 0.12% annually. Since this is far below the likely natural mortality rate of healthy elephant populations, we question the accuracy of the percentage breakdown provided by ZPWMA in their letter.

African elephants in Zimbabwe are listed in CITES Appendix II, with an annotation that allows trade in hides. According to CITES trade data, at least 2,373 hides were exported in 2010, 3,204 in 2011, and 4,675 in 2012. It should be noted that these numbers probably do not equate to whole animals, but include whole hides and parts of hides. Some of these hides may have been obtained from sport-hunted trophies, problem animal control, or culling operations. Based on these reported numbers, it is not possible to determine the elephants taken specifically for the hide trade, however. While the Service asked about the export of hides in its October 31 letter, ZPWMA did not directly address the issue in its response letter. They did state that the export of hides was authorized under the annotation for African elephants and that all hides that are exported are legally obtained.

We continue to have fundamental questions regarding how the number of elephants to be hunted in an area is decided. In addition to questions about how the overall offtake is determined, we also have not received an adequate explanation on how the quota is allocated spatially. According to information from ZPWMA, and from safari outfitters and professional hunters associations, the principle form of utilization of the elephant in Zimbabwe is sport-hunting.

Quotas are apparently set to maximize the sustainable production of high-quality trophies without detriment to the population. However, it appears that the national export quota of 500 elephants may be the primary driver when establishing individual quotas for each hunting area, as opposed to determining the best quota to facilitate management goals for those areas. According to the material provided to the Service, it appears that the annual national quota of 500 elephants is divided up and allocated to each area based on recommendations from ZPWMA ecologists, field staff, safari operators, other stakeholders, and technical specialists through "multiple stakeholder participatory quota setting". According to information provided by ZPWMA, on an annual basis, stakeholders use available population data to propose a particular quota for an area to a Quota Setting Workshop. At this workshop, it is determined if the proposed quota should be adopted or modified in relation to other proposed quotas. Factors that are considered each year include population estimates, growth rates of populations, size of hunting areas, status of habitat, and target elephant population size.

While the material provided to the Service lays out the general process, the Service did not receive any specific information on how quotas are established in practice. ZPWMA provided the District Quota Setting Toolbox and the Quota Setting Manual, published in 2000 and 1997, respectively. While these documents are useful training material, they only provide a general overview of quota setting for all species in Zimbabwe. In establishing a quota, one must take into consideration not only the habitat, population size, and size of the hunting area, but other offtakes and environmental impacts that may be affecting the species. Nothing that ZPWMA provided addresses these elements specifically. Further, if ZPWMA starts with the premise that the sum of all established quotas must equal the national export quota, it is not clear if the science is driving the quota-setting process or if the social/economic benefits derived from hunting is the driving force. Finally, without current population data and information on the distribution of elephants across the country, both of which would come from scientifically based population surveys, it would appear that establishing a scientifically viable quota, either higher or lower than previous years, would be impossible. The current quota-setting process utilized by ZPWMA may take into consideration issues raised in this document, but without providing an explanation of the system used and describing the calculations, the Service cannot determine if sport-hunting quotas are reasonable or beneficial to elephant populations, and therefore whether sport-hunting is enhancing the survival of the species.

One of the aspects of whether current elephant management facilitates long-term sustainability of hunting programs is the length of hunting leases. There is a general consensus, supported by antidotal evidence, that shorter leases do not give safari operators an incentive for long-term planning. A representative of the Safari Operators Association of Zimbabwe (SOAZ) and the Zimbabwe Professional Hunters and Guides Association (ZPHGA) at the 2014 workshop, stated that the "present 5-year leases are not working as areas are being abused at the expense of wildlife" and that "[l]onger leases will provide better protection and investment in such areas. All leases must be open and transparent." In addition, he expressed that "[a]t present, large fixed quotas are forcing concession holders to take young animals that should not be shot, to recoup moneys paid for leases and trophy fees. Authorities need to stop transfers of quotas from one area to another for elephant and for all trophy species." He spoke of the need for taking smaller,

non-trophy bulls that are conducting crop raids to compensate local communities. He also spoke of stopping commercial hunts in the national parks and "most of all, keep the South Africans out – they are abusing our wildlife". He recommended that ZPWMA allocate all quotas by December 1 each year so that operators can market their hunts effectively. He also called for greater communication between ZPWMA and SOAZ and ZPHGA.

A second presenter at the workshop representing the Zambezi Society, stated in the working session on Coordination, Monitoring, Reporting, and Annual Adaptive Management that "we are looking at managing a multi-million dollar resource and what is a major project but appointing a part-time coordinator to attempt to pull together a multitude of stakeholders with a result that will fail". The speaker further stated, "[t]he way elephant conservation has been managed over the last several years in the face of an escalating poaching threat has clearly failed. ...The four sub-regions have differing characteristics and problems and separate plans are required for each sub-region" and called for a professional project manager to head the elephant conservation and management program in Zimbabwe, "otherwise it will not succeed."

While the above comments were made by two individuals at the workshop, since both individuals represented National organizations, their statements could be taken as an indication that additional work is needed to better coordinate professional hunters, safari outfitters, and NGOs with ZPWMA and communities. Without this "partnership" long-term sustainability of the hunting program could be affected and the role that U.S. hunters play could be questioned.

Revenue Utilization: On communal lands in Zimbabwe, the protection of elephants falls primarily under the Communal Areas Management Programme for Indigenous Resources (CAMPFIRE), which encourages reductions in human-elephant conflicts through conservation-based community development. The program was established in 1989 as a means of providing an economic incentive and return to rural communities while encouraging tolerance for the elephant and sustainable use of natural resources. This program has been the model for community-based conservation efforts in several other African countries and identified as an innovative program in the past. Under this program, there are currently 29 Rural District Councils (RDCs) that have been granted Appropriate Authority status under the Parks and Wild Life Act. Based on several CAMPFIRE documents presented to the Service, between 12 and 16 RDCs with exploitable wildlife resources make up the core of the CAMPFIRE program. While the Service recognizes that CAMPFIRE plays a role in elephant management, we did not receive clear information on the significance they play in elephant conservation (e.g., amount of elephant habitat occurring on RDC land or the percentage of elephant trophies taken on RDC lands).

According to the Revised CAMPFIRE Revenue Sharing Guidelines, which were incorporated into the Constitution of the CAMPFIRE Association in 2007, at least 55% of generated revenue from hunting should be devolved to producer communities, no more than 26% and 15% for management and overhead at RDC level, respectively, and 4% as a levy to the CAMPFIRE Association. According to an undated document (but presumably produced in late 2014) produced by CAMPFIRE (CAMPFIRE report undated) at least 10 RDCs comply with the Revenue Guidelines. As reported in this document, data were presented in an October 2013

report stating an estimated US$2,496,349 was generated by 15 RDCs in 2012 from hunting revenue. While this report states that 5 out of 13 RDCs contributed 84% of the hunting revenue, the supporting table to this statement does not reflect this number. Further, the report states that an assessment of 18 main CAMPFIRE districts allocated hunting quotas for 2014 shows that 106 out of 167 bull elephant hunts were booked by U.S. hunters and that elephant hunting contributes more than 70% of the income to the CAMPFIRE program, and that 90% of all CAMPFIRE revenue comes from all hunting.

The CAMPFIRE report (undated) reported that in the Community Based Natural Resources Management Stocktaking Assessment Report by Mazambani and Dembetembe (2010) [Service does not have a copy of this report], between 1989 and 2006, US$88.9 million in gross revenue was realized by key stakeholders in the CAMPFIRE program. Of this revenue, 55% went to safari outfitters, 23.4% to producer communities, 19.8% to RDCs, and 1.8% to CAMPFIRE Association. (The Service has no additional documentation or information to validate these figures.)

CAMPFIRE may well provide a "multiplier effect" concerning ecosystems goods and services. According to information received by the Service, in 2007, an estimated 777,000 households from 37 RDCs benefited directly or indirectly from CAMPFIRE. According to an estimate by CAMPFIRE officials (CAMPFIRE report undated), given that 58 RDCs now participate in CAMPFIRE (other sources state that there are 60 RDCs in CAMPFIRE), it has been extrapolated that over 1 million households now benefit from CAMPFIRE.

Several reports provided to the Service identify a large number of community projects funded by CAMPFIRE. These reports indicate CAMPFIRE programs contribute to employment at a local level – CAMPFIRE managers and officers, timber measurers, office clerks, game scouts; community projects employ resource monitors, tour guides, preschool teachers, grain millers, bookkeepers; and safari operators employ managers, scouts, trackers, drivers, cooks, camp minders, and professional staff such as bookkeepers and professional hunters.

On 17-18 November 2014, a workshop titled "CAMPFIRE Stakeholder's workshop: Towards the Development of a New Elephant Management Plan and Policy" was held in Zimbabwe. The discussions and recommendations touched on the effectiveness of the CAMPFIRE concept and its relationship to tourist hunting. At the workshop, Charles McCallum Safari reported that they had contributed over $349,000 to CAMPFIRE wards and the RDC in 2013 – U.S. elephant hunters contributed 40% of this total ($132,870). In 2014, the total was up to $400,995 but contributions due to U.S. hunters dropped to 27% ($100,800) – all elephant hunting was only 32% of the total ($118,425). It appears that the workshop may have been a good starting point to address issues faced by RDCs and to improve the effectiveness of CAMPFIRE. However, according to Conservation Force, represented at the workshop, CAMPFIRE needs to find a balance between a large elephant population and human population pressures, as well as ensure that revenue from tourist hunting and other resource uses continue to flow to local communities. The 2014 Pan African survey preliminary results appear to confirm that elephant populations in the Zambezi Valley and in Sebungwe have decreased significantly. These areas include

communal land. The declines indicate that the persistence of elephants in these areas may be in question in future years if the trend is not halted or reversed.

Dr. Martin states in his "Third Report: Potential Financial Returns from Trophy Hunting" (pg. 19, 21) that "when the results from all the available hunting areas in Zimbabwe are added up, there is sufficient income from trophy hunting to meet the conservation budgets for all the areas [of the elephant range]..." This may very well be true, but no such data was provided to the Service. We received reports from some private areas, conservancies, and RDCs, but even in these cases, insufficient information was provided. We received generalized reporting of hunting as a whole, without a breakdown of elephant vs. other species, or U.S. hunter vs. all hunters. Although there is some indication that some benefits are occurring, insufficient information has been provided to show that revenues generated by U.S. elephant hunters satisfy the conditions of enhancement under the ESA.

FWS does not disagree that local communities can benefit from well-managed resource management programs, but we are unable to determine how much revenue is generated by elephant hunting, how those funds are distributed within Zimbabwe, and what portion of that budget is accounted for by US hunters? SCI indicates, in their January 23, 2015 letter, that the inability to import trophies in 2014 resulted in an increase in human-elephant conflicts in CAMPFIRE RDCs from 412 incidents in 2013 to 597 in 2014. No data was provided to document a link between the increase in human-elephant conflicts indicated by SCI and the suspension of imports in 2014.

Local conservation efforts: Conservation Force and other commenters emphasized the economic impact of the suspension to local conservation efforts being carried out by individual landowners and leaseholders, safari outfitters, and conservancies. Effective conservation work is being carried out in some independently managed areas. Individuals may be impacted by a suspension of elephant trophy imports, however, it is unknown whether and to what extent these individuals would reduce their conservation efforts based on the inability of U.S. hunters to import a sport-hunted trophy. In addition, the information available to the Service on the conservation work being carried out by non-governmental entities, at this time, is limited, and is not the norm for Zimbabwe as a whole. While these pockets of conservation are greatly needed, there does not appear to be a mechanism in place, such as government support, tax incentives, or land tenure security, to promote or sustain these efforts across Zimbabwe's elephant range. The Service was made aware of several workshops that will be held or were held in the beginning of 2015. According to Conservation Force, a workshop on anti-poaching strategies for Mana Pools National Park was held on 26-29 January 2015. The workshop appears to have been sponsored by ZPWMA with NGO, safari operators, and some RDC representation; however, we have not received any information on the purpose of the workshop or any results. In addition, a workshop in Sebungwe was held sometime in January or February 2015. Again, we are not clear on the purpose of the workshop or any results. However, if these and other workshops were held that bring ZPWMA, RDCs, and safari operators together to discuss elephant conservation and management, it would appear that steps are being made to move forward in increasing communication and addressing issues.

Therefore, with the information made available to us, the Service cannot at this time determine that these limited activities would provide the enhancement required under the ESA to allow imports of trophies taken throughout Zimbabwe.

Summary: The issue before us is whether the killing of an elephant in Zimbabwe whose trophy is intended for import into the United States would enhance the survival of the species in the wild. When the Service announced the interim suspension on the import of elephant trophies from Zimbabwe on April 4, 2014, we based the decision on the lack of information available to the Service at that time that would enable us to make a positive finding. In response to our April 4, 2014, announcement and letters sent to the Government of Zimbabwe on April 4 and October 31, 2014, we received a large volume of information directly from ZPWMA, Conservation Force, Safari Club International, and a number of safari outfitters and professional hunter associations. Some information indicated that hunting in Zimbabwe was providing a benefit to elephants, while other information raised questions that were not answered. Many of our specific questions were not answered with the information provided. Based on our review of all of this information, we are unable to find that the killing of an elephant whose trophy is intended for import would enhance the survival of the species in the wild due to the following factors:

- Zimbabwe's current elephant management plan consists of two primary documents drafted in 1996 and 1997. Although the documents provide a well-developed list of goals and objectives, there is no information on whether these goals and objectives have been met or could be met. This is supported by statements from ZPWMA that the plans are outdated and need to be revised.

- Now that the Pan African Elephant Aerial Survey has been conducted in Zimbabwe and preliminary findings have been announced, ZPWMA and RDCs have a better elephant baseline population abundance estimate to assess future off-take quotas, management efforts, and anti-poaching activities. This is a significant, positive, step forward in Zimbabwe having adequate information to establish scientifically defensible hunting quotas, particularly in light of the limited information on other means of off-take, such as poaching and problem animal control. If this information is incorporated into ZPMWA management activities in a scientifically sound manner, the Service may have a better basis to re-evaluate our finding with regard to importation of elephants taken in the future.

- There appear to be adequate laws and regulations in place to address elephant management, but it is not clear if or to what extent ZPWMA is able to successfully implement them. Since the central Zimbabwean Government is not allocating funding to ZPWMA and the vast majority of funding must come from hunting revenues, ZPWMA, and CAMPFIRE need to document more fully the amount of revenue generated and how it is utilized. For the 2014 hunting season, the Service received limited evidence to support a positive enhancement finding. If accounting mechanisms are in place or are put in place that document hunting revenue and details are provided on how those funds are used for resource protection such that the Service would be able to find that hunting revenues generated

through sport-hunting of elephants in Zimbabwe whose trophies are intended for import into the United States would enhance the survival of the species in the wild, the Service could re-evaluate our finding with regard to importation of elephants taken during the 2015 hunting season or future hunting seasons.

- According to the information provided, Zimbabwe has established hunting quotas for all areas of the country. However, the Service did not receive specific information on how these quotas are established, whether other forms of offtake, such as poaching and problem animal control, were taken into account, or to what extent biological factors are taken into consideration (as opposed to economic and societal considerations).

- While CAMPFIRE has provided conservation benefits in the past and improved tolerance of wildlife in rural communities, the program has more recently come under criticism relating to excessive retention of generated funds by district councils, resulting in diminished benefits to communities. Sport-hunting may be an important tool that gives these communities a stake in sustainable management of the elephant as a natural and economic resource and offsets the costs of conflict with wildlife. However, without current information on how funds are utilized and the basis for hunting off-takes, the Service is unable to confirm whether revenue generated through sport-hunting actually provides an incentive to local communities to conserve elephants. The Service was pleased to hear about the November workshop and acknowledges that additional work is needed by CAMPFIRE to address current management concerns. Again, if additional information is forthcoming regarding activities in 2015, the Service may be able to revisit this finding.

- As stated in the previous finding, there are "bright spots" regarding elephant conservation efforts, particularly those carried out by non-governmental entities that are providing a benefit to elephants in some areas. However, there are not enough of these "bright spots" to overcome the problems currently facing Zimbabwe elephant populations and to support a finding that sport-hunting is enhancing the survival of the species. Without more support from the Central Government and Rural District Councils, these efforts are not likely to be fully successful or to compensate for the management deficiencies described above.

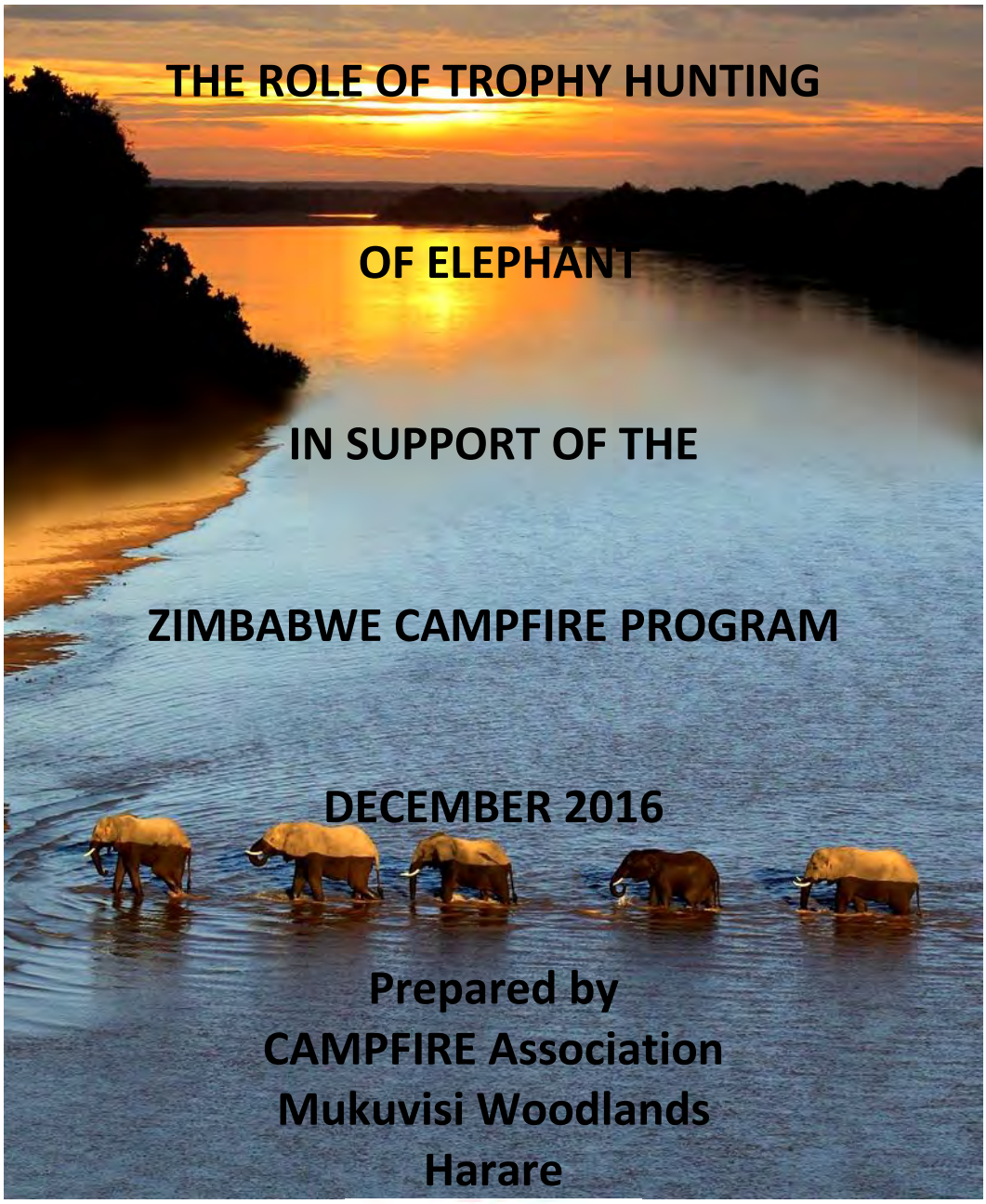
Therefore, based on this finding, no elephants harvested in Zimbabwe on or after January 1, 2015 may be imported into the United States.

THE ROLE OF TROPHY HUNTING

OF ELEPHANT

IN SUPPORT OF THE

ZIMBABWE CAMPFIRE PROGRAM



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ACRONYMS AND ABBREVIATIONS

AA	Appropriate Authority
CA	CAMPFIRE Association
CAMPFIRE	Community Areas Management Program for Indigenous Resources
CCG	CAMPFIRE Collaborative Group
DNPWLM	Department of National Parks and Wildlife Management
ESA	Endangered Species Act
FWS	United States Fish and Wildlife Service
RDCs	Rural District Councils
SOAZ	Safari Operators Association of Zimbabwe
USAID	United States Agency for International Development
ZPHGA	Zimbabwe Professional Hunters and Guides Association
ZPWMA	Zimbabwe Parks and Wildlife Management Authority

Acknowledgements

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Cover photo: Lin Berrie, Chilo Lodge, Mahenya CAMPFIRE Area

EXECUTIVE SUMMARY

In April 2014, the United States Fish and Wildlife Service (FWS) suspended the import of elephant trophies taken in Zimbabwe. In March 2015, the suspension was extended to include future hunting seasons. For it to reverse this decision, the FWS must make a finding that the killing of the animal whose trophy is intended for import would enhance the survival of the species in the wild. The Zimbabwe Parks and Wildlife Management Authority (ZPWMA) defended its position and provided the FWS with significant amounts of information and data related to elephant management. While this is acknowledged, the FWS was still of the opinion that its concerns had not been addressed, and identified six areas where additional information was required.

The CAMPFIRE Association has taken these into consideration, especially the issues regarding "excessive retention of generated funds by Rural District Councils", and how much revenue elephant sport-hunting provides and how much of that comes from U.S. hunters. This document addresses part of the information requested by the FWS under "Revenue Utilization" to demonstrate that by allowing the importation of trophies taken by U.S. hunters, the survival of elephants in Zimbabwe would be enhanced. To support this position, the CAMPFIRE Association outlines the evolution of the CAMPFIRE Program, describing the extent of its coverage and the impact that it has had on wildlife conservation in Communal Areas of Zimbabwe.

Evidence from the 2014 national elephant survey is provided to show that Zimbabwe has a substantial elephant population that is managed sustainably through an adaptive quota setting mechanism. Data from 9 CAMPFIRE Districts that participated in this audit of CAMPFIRE revenue shows that approximately 60% of the allocated elephant quota is utilized and that the majority of hunters (53%) originate from America. These hunters have contributed US$9 million towards the CAMPFIRE Program during the period 2010-2015 compared to US$8 million by the 40 other nations.

The income generated from trophy fees in the last 6 years (2010 – 2015) is approximately US$11.4 million of which elephant trophy fees contributed 65%, while a further US$4 million has come from the sale of hides, concession fees and other sundry income. These funds have been distributed to CAMPFIRE communities in various Wards who received approximately 57% (range 39% - 77%) of the Trophy Fees.

A standardized tool designed to gather baseline data has provided information on the physical and human parameters of the 9 participating Districts including how and on what the revenues from hunting have been utilized. At the District level, approximately 80% of the funds are used to support the administration and management of the CAMPFIRE program, including investment on law enforcement. In contrast, 55% of revenues provided to the producer Wards are channeled towards supporting social services such schools, clinics and other programs that benefit the community.

The cost of living with wildlife, and particularly elephants, is shown through providing data on the scale of crop damage (7,000ha over 6 years) that has a significant impact in terms of its monetary value on rural communities who face food insecurity and deep poverty (average income US$1 a day). 96 human lives were lost to wildlife attacks, with elephant accounting for more than half of those deaths. Yet despite these challenges, communities still retain a high level of tolerance for elephants, but this support is rapidly dissipating as a result of the loss of income from trophy hunting. This places almost two million hectares of wild land at risk, including the risk of increasing retaliatory killing through poisoning and illegal wildlife crime.

A way forward is discussed outlining how the resumption of trophy imports can offset the challenges facing the CAMPFIRE program and through this, enhance the conservation of elephant outside of the protected areas.

1 INTRODUCTION

In April 2014, the United States Fish and Wildlife Service (FWS) suspended the import of elephant trophies taken in Zimbabwe. The suspension was extended to include future hunting seasons on March 26, 2015. In May 2015, the Assistant Director (International Affairs) from the United States Fish and Wildlife Service (FWS), Mr. Byron Arroyo, wrote to the (then) Minister of Environment, Water and Climate outlining the reasons why the Service made a determination on 26th March 2015 that it was unable to authorize the import of elephant trophies taken in Zimbabwe in future. This is further explained in detail in the "Enhancement Findings for African Elephant Taken as Sport-hunted Trophies in Zimbabwe during 2014" published on the 7/22/14 (see reference FWS/AIA/DMA).

The FWS make the point that for it to authorize imports of sport-hunted African elephant trophies into the USA, the Service must be able to determine that the requirements of the special rule for the African elephant under the U.S. Endangered Species Act (ESA) have been met (see 50 CFR 17.40(e)(3)(iii)C). Specifically, the FWS must make a finding that the killing of the animal whose trophy is intended for import would enhance the survival of the species in the wild.

In defense of this, the Zimbabwe Parks and Wildlife Management Authority (ZPWMA) provided the FWS with significant amounts of information and data related to elephant management. The FWS also communicated with various stakeholders including the Safari Operators Association of Zimbabwe (SOAZ), Zimbabwe Professional Hunters and Guides Association (ZPHGA), the CAMPFIRE Association, as well as individual professional hunters and outfitters, and independent scientific researchers.

The FWS acknowledged this input but still believed the data received did not fully address the questions regarding how elephants are managed in Zimbabwe, and how, by allowing the importation of trophies taken by U.S. hunters, that the survival of elephants in Zimbabwe would be enhanced. Six areas were identified where additional information was required. These are:

1: Updated Elephant Management Plan with formalized targets or indicators

2: Current elephant population data and the impact of hunting on the elephant population

3: Levels of poaching and prevention, including MIKE and PIKE data

4: Regulation and enforcement, particularly regarding the use of funds generated by U.S. hunters to support law enforcement and management

5: Sustainable use of elephant, specifically information of the levels of legal and illegal offtake

6: Revenue utilization from the hunting of elephant on Communal Lands, Safari Areas, Forestry and Private Conservancies.

The CAMPFIRE Association is not able to address these issues since these are the prerogative of the ZPWMA who is responsible for the conservation and management of elephant at the national level. Nonetheless, the CAMPFIRE Association is in a position to address part of the information requested under "Revenue Utilization", and contribute indirectly to the other five issues raised by the FWS.

2 Overview of Community Based Natural Resources Management in Zimbabwe

There are numerous reports and references in the literature that analyze the community based natural resources management program (CBNRM) in Zimbabwe. A more recent assessment can be found in the document prepared for USAID Zimbabwe by Mazambani and Dembetembe (2010).

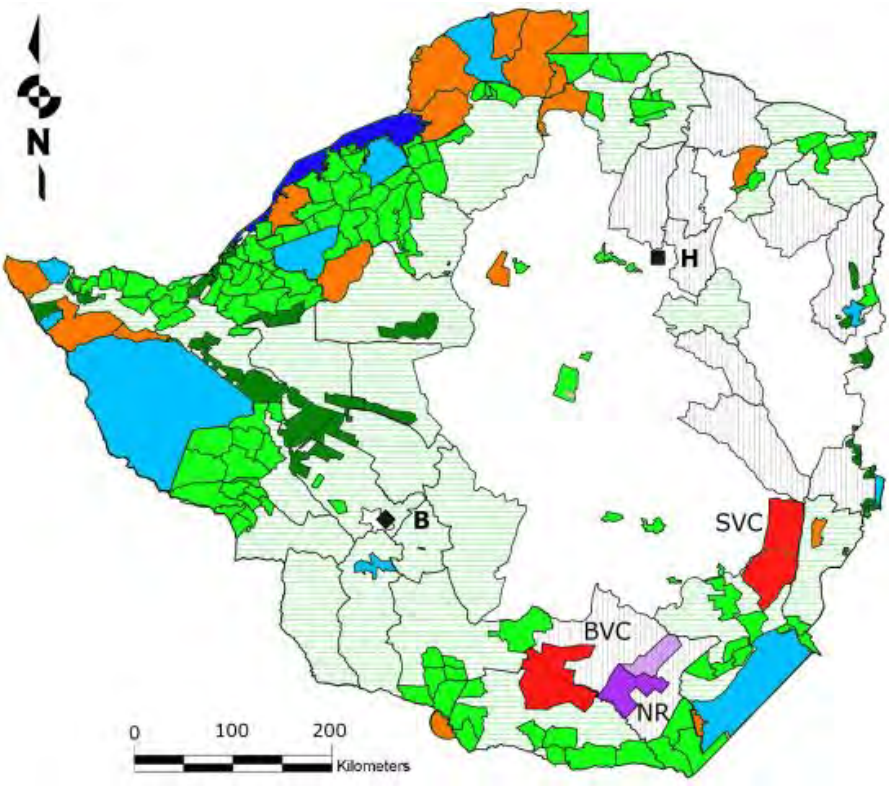

Figure 1: The location of CAMPFIRE areas (in light green) relative to National Parks (blue), Safari Areas (orange), Forest Areas (dark green) and Conservancies (red).

In 1982, the government amended the 1975 Parks and Wildlife Act to enable Rural District Councils (RDCs) to obtain 'appropriate authority' (AA) to utilize wildlife for commercial gain. The proposed changes were aimed at finding alternative forms of land use to subsistence agriculture on marginal lands. At that time, there was no particular model as to how this could happen without threatening the resource base. The (then) Department of National Parks and Wildlife Management (DNPWLM) began to explore options within the framework of an integrated landuse plan for the communal lands bordering National Parks and Safari Areas. This Act provided an opportunity to extend to communities in the Communal Lands the benefits that the private landowners enjoyed as a result of the 1975 Parks and Wild Life Act. This eventually led to the birth of Zimbabwe's Community Areas Management Program for Indigenous Resources (CAMPFIRE), which had far reaching impacts on wildlife productivity as well as the socio-economic wellbeing of CAMPFIRE communities.

2.1 The CAMPFIRE Program

The CAMPFIRE program was conceptually designed to focus on wildlife, woodlands, water, grazing resources, and grasslands. In practice, it focused on managing wildlife because of the direct monetary benefits which this resource offered to producer communities. The CAMPFIRE concept (see Murphree, 1993; Jones and Murphree, 2001) was developed in response to the realization that unless communities living adjacent to National Parks can obtain direct value from wildlife, they will not protect the wildlife. These communities would also need to have a much greater say in how those benefits would be derived and utilized.

While the 1982 amendment of the 1975 Parks and Wildlife Act permitted devolution of authority over wildlife to Rural District Councils (RDCs), the DNPWLM had meager resources to render the program operational (Jones and Murphree, 2001). The DNPWLM therefore turned to such institutions as the Center for Applied Social Sciences (CASS) at the University of Zimbabwe, which was assigned a socio-economic research and evaluation role; the WWF Multispecies Animal Production System Project in Zimbabwe; and the Zimbabwe Trust—an NGO focusing on rural development. These agencies had different but complementary objectives and together with the DNPWLM they formed the original CAMPFIRE Collaborative Group (CCG).

From 1986 to 1988, DNPWLM and its CCG partners engaged in discussions with selected communities and RDCs to identify locations for the inception of the program. The discussions focused on two main criteria, namely:

(a) voluntary interest in participation by communities and District Councils, and

(b) the presence of wildlife populations capable of producing sustainable and economically significant revenues.

The CCG work during this period also involved securing political support for the program, and attending to the demands of institutional and administrative detail associated with the conferment of Appropriate Authority (AA) by DNPWLM to RDCs, including the guidelines for awarding revenues and other benefits to communities from the the number of animals harvested within a local community's area each hunting season.

The agreed but non-binding guidelines stated that not less than 50% of the revenues was to be paid to the communities (as wards), not more than 35% was to be allocated to wildlife management (habitat management, fire control, monitoring, hiring of game scouts, etc.), and that 15% could be retained by the District Councils as an administrative levy.

Under the CCG, the CAMPFIRE Program attracted donor support and evolved through a number of phases.

- **Phase I** 1989-1994: (US$10m grant support – USAID and various partners). The period saw the initiation of CAMPFIRE and donor support was channelled towards the improvement of safari hunting in major districts that had been granted AA by 1995. This is also the period in which CAMPFIRE Association was established to coordinate the program.
- **Phase II** 1994-2003: (US$30m - USAID). This support focused on the capture of other natural resources (e.g. timber, sand, fishing, etc.). High-end non-consumptive tourism facilities were developed in Nyaminyami and Chipinge districts in the early 1990s, and 12 'joint venture' eco-tourism lodges were in operation in communal areas by 1999. Small grants were also provided to support the development of eco-tourism, crafts, and other community based natural resources management projects. Investments were also made in the production of natural resource products (e.g. fish in Beitbridge, Mwenezi; mopane worms in Bulilima Mangwe and Gwanda; honey in Binga, Kusile, Mutoko, and Nyanga districts) and many other products.
- **Phase III** 2003-2007: (US$165,000 – Ford Foundation). This period saw the cessation of major donor funding to CAMPFIRE, and it also coincided with larger macro level policy changes in

Zimbabwe after 2000, and the subsequent adverse socio-economic conditions. This led to the collapse of financial and technical support previously provided by the CCG.

- **Phase IV** 2007-present: (US$350,000 WK Kellogg Foundation). During this period, there was hyper-inflation, which led to the loss of income from hunting in real terms. This situation stabilised in 2009, when multiple foreign currencies were introduced. The CAMPFIRE Association maintained operations through a 4% levy paid by major hunting districts amounting to less than US$100,000 annually.

Following are key achievements in the development of CAMPFIRE (see Mazambani and Dembetembe, 2010):

I. Guruve and Nyaminyami, the first RDCs to be granted AA status, received their first hunting revenues in 1988. This had a dramatic effect in that many districts that are rich in wildlife applied for AA status and by the end of 1991 eleven additional districts had been granted AA status.

II. By the end of 1991, the 13 districts participating in the program collectively grossed US$1.1 million in revenue for that year.

III. By 1995 there were 23 districts participating in the program.

IV. The CAMPFIRE Association (CA), the secretariat for all districts with CAMPFIRE activities, was formed in 1992. Its primary objectives were to promote the wildlife interests of RDCs and to serve as an association of producer communities. The association played an important role in securing full government support for wildlife management in communal lands so that CAMPFIRE became a recognized conservation program.

V. Between 1995 and 2000 CAMPFIRE not only witnessed growth in terms of attracting more districts, but also in building the capacity of the RDCs, and in diversifying their activities to include other natural resources. The number of RDCs that were awarded AA status to manage wildlife increased from 2 in 1988 to 27 in 1996. Institutional capacity building grants via United States Agency for International Development (USAID) funding were secured for 24 districts from 1996 to 1999.

VI. Between 1989 and 2001, CAMPFIRE revenues amounted to almost USD $ 20.3 million, 97% of which originated in the original 13 districts. Of this, 49% was disbursed to communities (118 wards with over 121,500 households), 20% used for wildlife management, just over 12% retained by the District Councils as a levy, 3% used for other expenses (including the then 1.5% levy to the CAMPFIRE Association), and about 15% was retained by the RDCs pending allocation (Khumalo, 2003). Almost 90% of this income came from safari trophy hunting.

VII. The period from 2001 to 2003 witnessed two significant developments in CAMPFIRE:
   a. formation and registration of community trusts as a strategy for devolving decision making and control over resources from the RDCs to community groups, and
   b. a concerted drive to diversify CAMPFIRE. Twenty-eight non-wildlife-based community projects received financial support through CAMPFIRE compared to only five wildlife-based community projects.

VIII. At its peak in 2002, CAMPFIRE encompassed 53 districts with AA, though only 23 of these really functioned as intended, while only 12 received regular income from wildlife.

IX. The Association has spearheaded the revision of CAMPFIRE revenue sharing guidelines to improve the community's share of income from 50% to 55% of hunting income. A Direct Payment System was developed in 2006 to ensure that communities receive their income on

time. A standard hunting contract has been developed to improve hunting administration by RDCs.

In summary, CAMPFIRE protects about 50,000 km^2 (12.7%) of land in Zimbabwe (Figure 1). Benefits from wildlife and other incomes encompass:

- Approximately 777,000 households (25%) in Zimbabwe benefited from CAMPFIRE directly or indirectly;
- Approximately 25% of Zimbabwe's people are receiving incentives to conserve wildlife and prevent anti-poaching through CAMPFIRE;
- Between 1994 and 2012, CAMPFIRE generated US$39 million of which US$21.5 million was allocated to communities and used for resource management (22%), household benefits (26%), and community projects (52%).
- About 90% of CAMPFIRE revenue comes from hunting with elephant hunting contributing up to 70% of annual revenue.
- Based on Constitution of the CAMPFIRE Association as amended in 2007, all major RDCs use CAMPFIRE revenue sharing guidelines, and in these districts revenue is paid directly into community controlled bank accounts by safari operators using the following guideline:
  - RDC fees (41%), CAMPFIRE Association Levy (4%), and CAMPFIRE community (55%).

In the following sections, we describe how the income from the hunting of elephant is generated and utilized using data from 9 Districts (Beitbridge, Binga, Bulilima, Chipinge, Chiredzi, Hwange, Mbire, Nyaminyami, and Tsholotsho) for the period 2010 and 2015[1]. For each of these areas we provided:

- Total number of elephant hunted
- Total revenue earned from elephant (and other trophy species)
- How the revenue is spent on various management and social services

We also provide examples of community project support and the impact of human-wildlife conflict over this period.

3 Sustainable Use and Utilization of CAMPFIRE Resources and Revenues

The CAMPFIRE program relies almost exclusively on income from hunting. Since 2009, the number of RDCs where hunting is practiced has decreased, mostly because of the prevailing socio-economic conditions that have resulted in high levels of poverty. This is seen as the key driver of the escalating levels of illegal wildlife crime, and poaching of elephant in particular. Maintaining elephant numbers outside of the protected areas is important to their overall conservation, and the reason why Zimbabwe regards the sustainable utilization of all wildlife as critical to its national conservation strategy. The hunting of elephant in CAMPFIRE areas thus plays an important role and is the major source of income to communities in these areas.

[1] Hurungwe provided partial information, as explained in relevant parts of the report

3.1 NUMBERS, DISTRIBUTION AND REGIONAL TRENDS OF ELEPHANT IN ZIMBABWE

Elephants are distributed in four main regional populations in Zimbabwe, namely, Northwest Matabeleland, the Sebungwe, the mid-Zambezi Valley, and the South-East Lowveld**.** Crude ecological densities vary between 2.16 elephant/km^2 in Northwest Matabeleland and 0.46 elephant/km^2 in the Sebungwe region**.**

Elephant densities in the Communal Areas varies from 1.50 elephant/km^2 in the south-east Lowveld to 0.06 elephant/km^2 in the Sebungwe region. Overall it is estimated that 5,000 elephants reside in Communal Areas and occupy approximately 16,000km^2 (Table 1, Zimbabwe Elephant Management Plan: 2015-2020).

Table 1. Numbers and densities of elephants in the four regions of elephant range within Zimbabwe. (Source: Zimbabwe National Elephant Management Plan 2015 - 2020, see Dunham *et. al.* 2015a, b, c and d).

Name of Region & Area	Area (km2)	Estimated Number of Elephants	Density of Elephants/km^2
NW Matabeleland	**24,989**	**53,991**	**2.16**
Hwange National Park	15,180	45,846	3.02
Matetsi Complex	4,402	4,843	1.10
Forest Areas	2,332	1, 101	0.47
Communal Lands	**3,075**	**2,201**	**0.72**
Sebungwe	**15,529**	**3,407**	**0.22**
Parks & Wildlife Estate	6,234	2,894	0.46
Forest Areas	261	16	0.06
Communal Lands	**9,034**	**497**	**0.06**
Mid-Zambezi Valley	**16,014**	**11,656**	**0.73**
Parks & Wildlife Estate	12,257	9,752	0.80
Communal Lands	**3,757**	**1,904**	**0.51**
South East Lowveld	**8,835**	**13,037**	**1.48**
Gonarezhou NP & Malapati SA	5,118	11,120	2.17
Save Conservancy	3,496	1,585	0.45
Communal Lands	**221**	**332**	**1.50**
Mozambique Border	*1,574*	*0*	*0*
National Total*	**65,367**	**82,091**	**1.23**
Parks & Wildlife Estate	43,191	74,455	1.75
Forest Areas	2,593	1,117	0.43
Save Conservancy	3,496	1,585	0.45
Communal Lands	**16,087**	**4,934**	**0.18**

* The survey did not include Bubye Valley Conservancy or the Tuli Safari Area and some other small populations that likely add another 1,000 elephants to the estimated total for the country. The area surveyed in Mozambique is not included in the national total or in the South-East Lowveld total area.

3.2 ELEPHANT QUOTA ALLOCATION AND UTILISATION

Zimbabwe is allocated an export quota of 500 elephants (1,000 tusks) in terms of the CITES regulations (see https://cites.org/eng/res/10/E-Res-10-10R16.pdf). In practice, Zimbabwe adopts an adaptive management strategy that sets the overall elephant quota at up to 0.75% of the overall population. This implies that the maximum national quota should not exceed 600 animals at the current population estimate of 80,000 elephants. However, to maintain trophy quality at approximately 35kg (77lbs), the national quota is set at 0.3 – 0.5% of the overall population i.e. 240 – 400 elephants, assuming an average offtake of 60% (R.B. Martin, pers. comm.).

The approach applied to the CAMPFIRE areas is to set quotas that use parameters that are higher than these national guidelines. This strategy is adopted to provide incentives to local communities that reside in areas where high levels of human-elephant conflict is recorded, and to facilitate benefits to local communities through sport hunting.

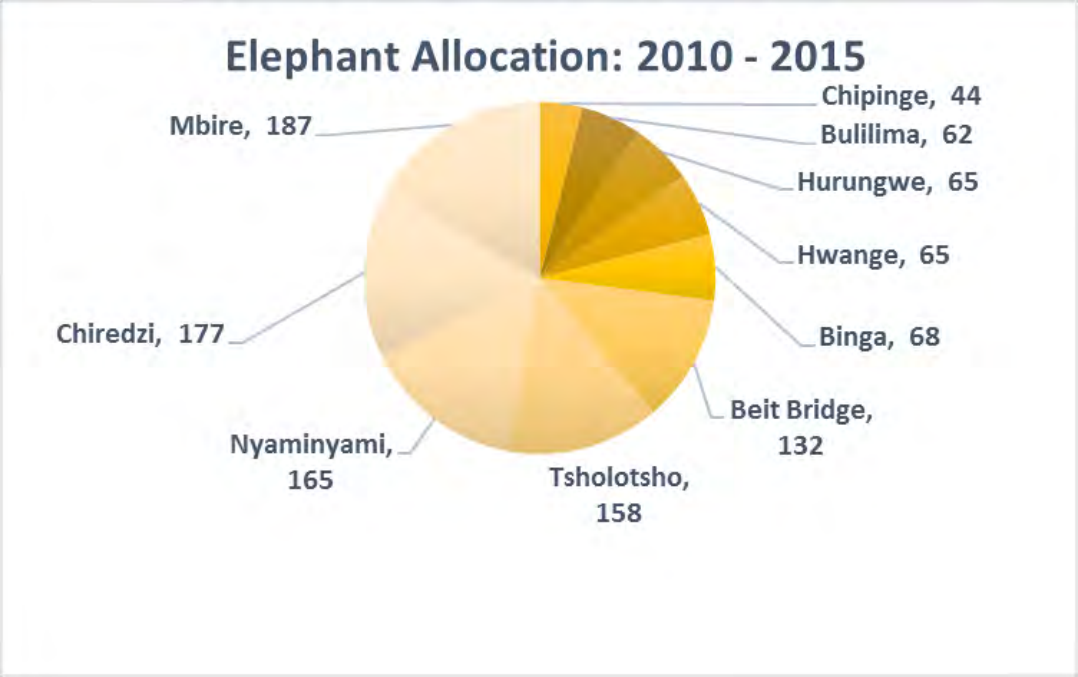

Figure 2: Total allocation of trophy elephant (N=1087) to nine major CAMPFIRE areas over a 6-year period

A total of 1,087 elephants have been allocated on quota to nine major CAMPFIRE areas since 2010 (Figure 2). This equates to 180 elephants per year. The distribution of this quota among the nine CAMPFIRE areas is dictated by the relative density of elephants in the neighboring protected areas and those residing in the CAMPFIRE areas. Tsholotsho, for example, that borders the southern boundary of Hwange National Park, was allocated 158 elephants (or 26/year) while Hwange, Binga and Hurungwe CAMPFIRE Areas that do not border onto areas of high elephant densities receive approximately 10 elephants/year.

The historical trend of utilization of the elephant quota (667 elephant or 61% of the quota allocation) is provided in Figure 3.

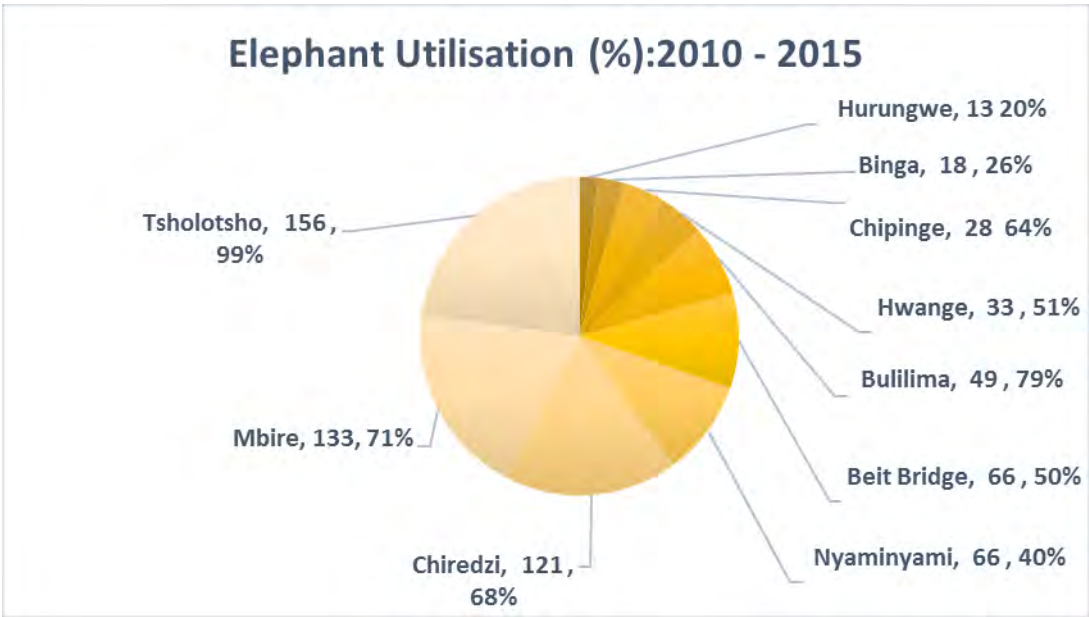

Figure 3: Overall utilization (%) of elephant quotas in nine major CAMPFIRE Areas over a 6-year period

Over the six years, Tsholotsho (99%), Mbire (71%) and Chiredzi (68%) have successfully utilized their allocated quotas while areas such as Hurungwe (20%) and Binga (26%) have not performed as well. The origin of clients hunting in these areas is summarized in Table 2. Over the 6-year period 1702 clients (average 284/year) have hunted in the seven CAMPFIRE Areas (excluding Binga and Hurungwe for which no data are available). Of these 897 clients (c.150/year or 53%) originated from the USA and 461 (c.77 or 27%) from Europe.

Table 2: Origin of hunting clients visiting the major CAMPFIRE Areas :2010 – 2015. Note. No data are available for Binga and Hurungwe

Origin of Clients	USA	Europe	Africa	Asia	South America	Oceania	Canada	Middle East	Total	Average
Beit Bridge	172	36	10	3	14	9	3	0	247	41
Bulilima	17	9	0	0	7	0	0	4	37	6
Chipinge	17	5	0	0	1	0	0	0	23	4
Chiredzi	151	52	57	69	0	0	0	0	329	55
Hwange	20	14	1	5	4	4	1	1	50	8
Mbire	213	90	36	0	10	16	3	0	368	61
Nyaminyami	273	218	24	1	18	21	8	0	563	94
Tsholotsho	34	37	3	4	1	1	1	4	85	14
Total	**897**	**461**	**131**	**82**	**55**	**51**	**16**	**9**	**1702**	**284**
Percentage	**53%**	**27%**	**8%**	**5%**	**3%**	**3%**	**0.9%**	**0.5%**		
Average/year	150	77	22	14	9	9	3	2		

3.3 Income Generation from Sport Hunting of elephants and other Key Species

3.3.1 Income received by Outfitters

To fully account for earnings in the hunting sector, the Reserve Bank of Zimbabwe, in collaboration with all the relevant stakeholders, introduced the Tourism Receipts Accounting System (TRAS) that required all outfitters to submit returns listing the revenue generated for hunting activities. This system has been in place for several years but required manual analysis of the data to extract the information. In January 2015, a web-based system (TRAS2) was introduced which links Safari Operators, Zimbabwe Parks and Wildlife Management Authority, Taxidermists, Shipping Agents, International Marketing Agents and Reserve Bank. Under this system all authorized hunts are registered allowing for the capture of hunting data (origin of clients, value of trophies and hunts, area hunted etc.), monitoring hunting quota utilization and tracking hunted trophies (Chitauro, 2016). The Exchange Control Division of the Reserve Bank of Zimbabwe and the ZPWMA are now able to:

1. Assess regional price differentials of similar hunts and the reasons thereof;
2. Present TRAS2 systems updates and reports to the users including international marketing agents;
3. Engage with international marketing agents of sport-hunting;
4. Obtain relevant insights on governing of the hunting sector; and
5. Come up with an effective mechanism to fully account for export proceeds from the hunting sector.

Outfitters that operate hunting concessions in CAMPFIRE Areas are required to deposit copies of the TRAS2 form with the CAMPFIRE Office in their respective RDCs/Wards. Each Office is therefore able to extract data on daily rates, trophy fees and other incidental revenues. Figure 4 provides a summary of the income by country of origin. This data confirms the major role of American hunters to the CAMPFIRE program who contribute 52% of the overall income.

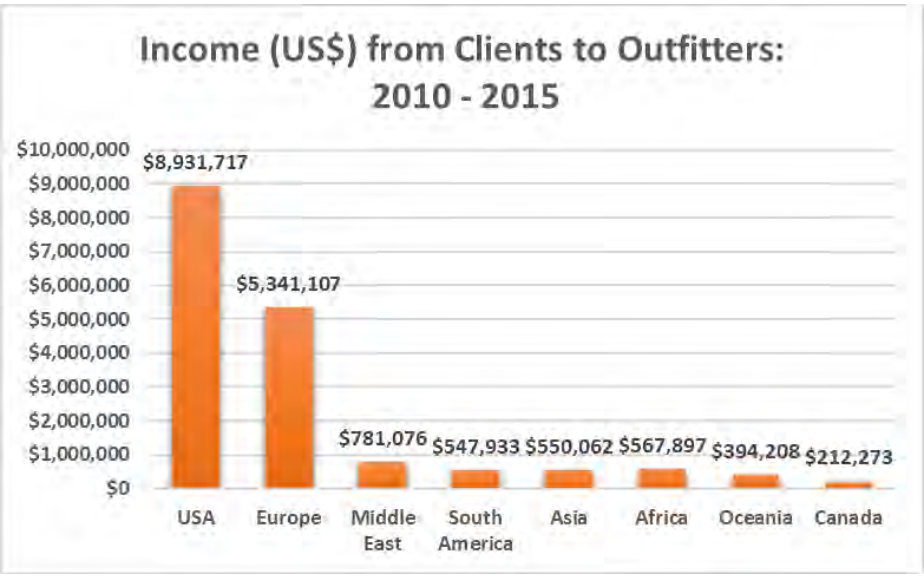

Figure 4: Contribution of hunting clients to the CAMPFIRE Program

3.3.2 Income from Trophy Fees

The data for the total amount of revenue generated for elephant, buffalo, leopard, hippo, crocodile and lion between 2010 – 2015 (approximately US$11 million) is shown in Figure 5.

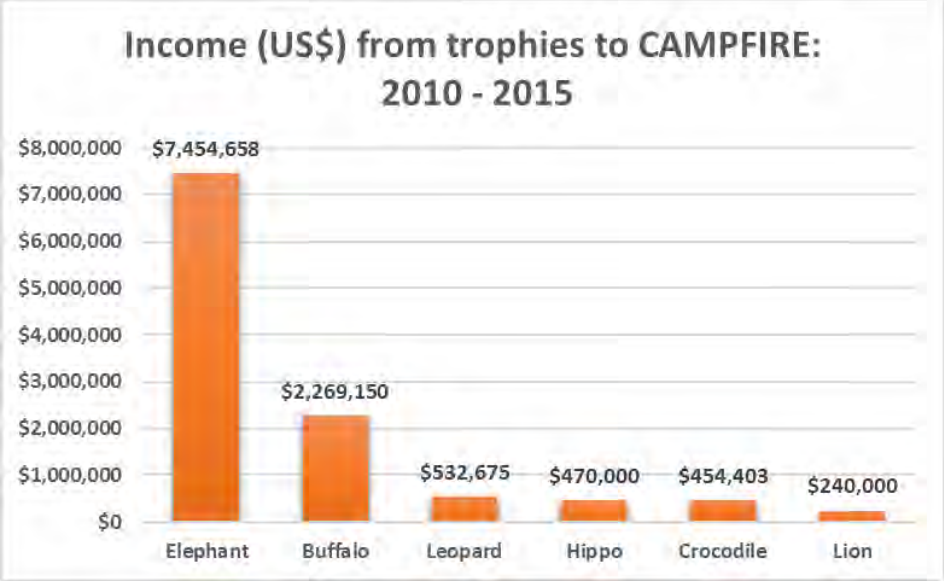

Figure 5: Income (US$) generated from the sale of key trophies

The importance of the income from elephant is clear from these data. Trophy fees from elephant account for 64% of all fees generated from the key species (approximately US$1.2 million/year). Buffalo (20%) are ranked second while leopard, hippo and crocodile contribute approximately 5% each. Noteworthy here is the low contribution of lion (approximately 2%). This low level of income generation is partly a result of the impact of the lion import suspension into the USA and Europe, decreasing quota allocations and decreasing offtake levels brought about by the recently imposed lion age hunting regulations. By comparison, the 897 American clients who hunted in CAMPFIRE Areas in the six-year period paid US$9 million in trophy fees and daily rates. Other nationalities, contributed US$8 million.

3.3.3 Other Income to RDCs

RDCs can generate income for other revenue streams, notably receiving a percentage of the daily rate, concession fees, bed night levies from photographic camps and from the lease/rent of equipment (Figure 6). The eight RDCs for which data are available generated approximately US$4 million from these revenue streams. Excluded here are revenues that could have been earned from the sale of ivory recovered from problem animal control (PAC) and natural deaths, and from the distribution of meat estimated at 550,000kg over the 6-year period.

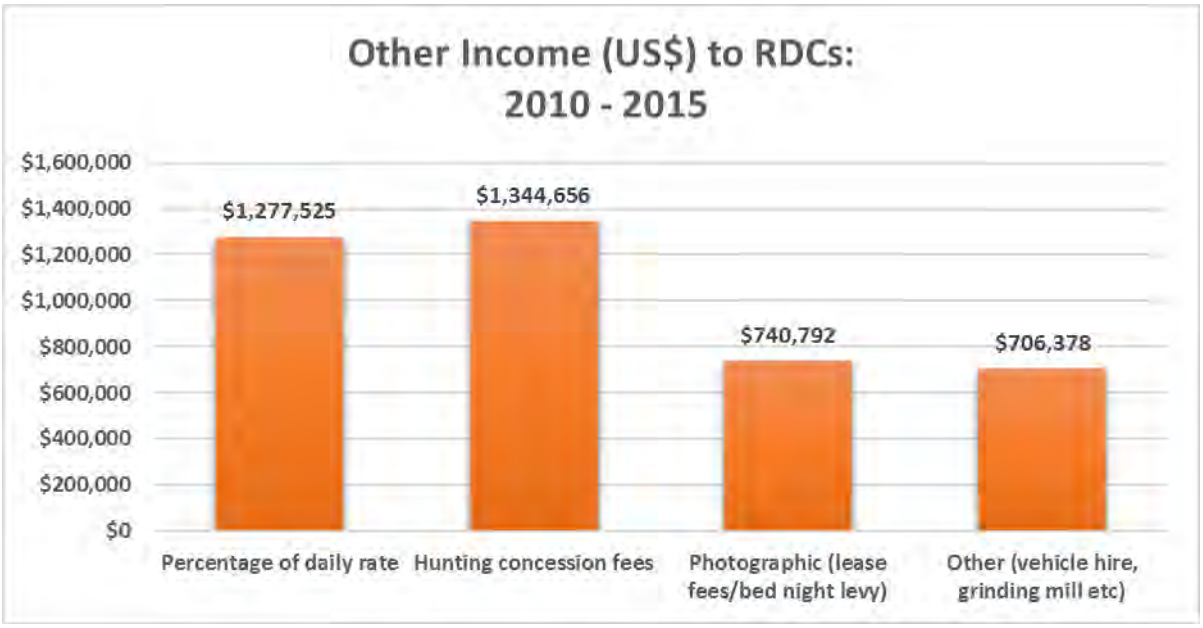

Figure 6: Income (US$) accruing to the RDCs from related income revenue streams

3.3.4 Benefit sharing: RDC vs Wards

Communities at the Ward level receive funds directly from the outfitter utilizing their area, except for those in Beitbridge and Hwange who are paid from dedicated CAMPFIRE accounts with the respective RDC. These funds are generated through trophy fees and income from the sale of hides, concession fees etc. (Table 3).

Over the last 6 years, the income generated from trophy fees is approximately US$11 million while a further US$4 million has come from the sale of hides, concession fees and other sundry income. The agreed split of these funds is that not less than 55% of the revenues is paid as Ward dividends, not more than 35% is allocated to the RDC for wildlife management (habitat management, fire control, monitoring, hiring of game scouts, etc.), and 15% is retained by the RDC as an administrative levy. Some RDCs do not consider all these revenues as "CAMPFIRE Funds" and segregate trophy fees from the other revenues. On average, the CAMPFIRE District Wards received 42% (range 23% - 66%) of the ***combined Concession and Trophy Fees***, but the Wards received approximately 58% (range 26% - 77%) of the ***Trophy Fees*** (Table 3).

Table 3: Summary of the benefit sharing (US$) of hunting related income between RDCs and Wards: 2010 - 2015

Districts	Income to RDC from trophy fees	Income to RDC from Hides, Concession fees etc.	Income to Wards	% All Revenue share: RDC vs Wards	% Trophy Fee Revenue share: RDC vs Wards
Beit Bridge	$657,458	$12,298	$370,228	55%	56%
Binga	$299,800	$364,224	$162,062	24%	54%
Bulilima	$521,700	$46,337	$403,685	71%	77%
Chipinge	$349,500	$139,259	$135,572	28%	39%
Chiredzi	$1,848,600	$181,420	$1,339,678	66%	72%
Hwange	$394,000	$105,131	$237,245	48%	60%
Mbire	$3,022,250	$54,420	$1,740,714	57%	58%
Nyaminyami	$1,883,853	$1,319,772	$1,132,204	35%	60%
Tsholotsho	$2,136,000	$1,990,200	$1,109,956	27%	52%
Total	**$11,420,886**	**$4,213,061**	**$6,631,342**	**42%**	**58%**

4 USE OF FUNDS BY RDCS AND WARDS

The CAMPFIRE Association prepared two templates in conjunction with district based CAMPFIRE Managers that were used as tools to audit the flow of income from safari hunting for the period 2010-2015, and how these funds are used to benefit CAMPFIRE communities. The tools gathered information on the following:

Tool 1: Data related to Rural District Councils

1. Area of district (either sq. km / ha) and total number of wards
2. The income generated by elephant, lion, leopard, hippo and crocodile i.e. Allocated quota (Number), Trophy fee, number hunted (offtake), percentage quota utilization.
3. The origin of the hunters (i.e. USA, Germany etc.) and the value of the safaris extracted from the TRAS2 forms where available. This data provided an indication of the income generation by outfitters.
4. The gross income that CAMPFIRE Districts received from the hunting and photographic activities (i.e. trophy fees, daily rates, concession fees, photographic fees, meat and any other sundry income).
5. Human resources employed at the District level (i.e. number of Wildlife Managers, number of Game Scouts, equipment (e.g., vehicles, patrol equipment etc.), patrol days per year.
6. The use of the funds to support:
    a. Meetings and Administration (i.e. the “15%” of funds)

   b. Law enforcement (RDC Game scouts, equipment, operational costs etc.)
   c. Compensation schemes (burial expenses, education, payment for hospital expenses etc.)
7. Management activities (fire guards, rehabilitation of water supplies, anti-poaching, problem animal control etc.)
8. Social services i.e. support to clinics, schools etc.
9. Other expenses not related to the above.

Tool 2: Data related to Wards

The following data was summarized for each ward in the District. The data collected at the Ward level was supported with evidence of income and expenditure e.g. copy of accounts, photographs of infrastructure etc.

1. Name of ward and ward number
2. Name and size of hunting area(s)
3. Name and number of village(s) and number of household beneficiaries
4. Income received at Ward level from hunting income, income generating projects from wildlife and other income (grinding mills etc.)
5. Allocation and use of income at Ward level for
   a. Meetings and Administration
   b. Wages/salaries
   c. Compensation schemes (e.g., burial expenses, education)
   d. Management activities (e.g., fire guards, rehabilitation of water supplies, anti-poaching, problem animal control.)
   e. Project running costs
   f. Social services (e.g. clinics, schools, grinding mills, roads, fencing, equipment, boreholes/pumps)
   g. Food security
   h. Direct cash benefits (i.e. to individuals, households, if applicable)
   i. Other
6. Human resources employed at the Ward level (i.e. number of Wildlife Managers, number of Game Scouts, equipment (e.g., vehicles, patrol equipment etc.), patrol days per year.
7. Number of Human and Wildlife Conflict cases by year and type (human death, injury, livestock, infrastructure)
8. Population estimates of major species (where available)

4.1 Profile of Rural District Councils

The data presented here has been extracted from Tool 1. For ease of understanding, these are presented below as follows:

- Characteristics of CAMPFIRE Districts
- Human resources and patrol effort
- Investment in equipment
- Expenditure

4.1.1 Characteristics of the CAMPFIRE Districts

The main parameters of the 10 RDCs (including Hurungwe) that provided data for this analysis are provided in Table 4. These RDCs represent approximately 9 million hectares of which 3.7 million hectares fall under the CAMPFIRE program. These RDCs have entered into agreements with both hunting and photographic outfitters who have invested in 26 hunting camps and 8 photographic camps respectively.

Altogether there are 224 Wards represented in these areas of which 104 are under the CAMPFIRE program. Excluding Hurungwe, there are 737 villages with a minimum of 85,847 households. This represents a community of approximately 600,000 people assuming that the average household is represented by 7 family members.

Table 4: Baseline features of the nine CAMPFIRE Districts

District	Total Area (Ha)	CAMPFIRE Area (Ha)	Hunting camps	Photo camps	Number of Wards	Number of Campfire Wards	Number of Villages	Number of Households
Beit Bridge	1,269,700	310,300	4	1	15	8	15	5,070
Binga	1,230,800	364,000	1	0	25	21	51	19,474
Bulilima	203,300	203,300	1	0	22	13	51	7,767
Chipinge	522,300	40,800	1	1	33	2	15	951
Chiredzi	1,710,239	481,004	5	0	32	9	52	9,461
Hurungwe	1,967,834	529,800	2	1	26	7	N/A	N/A
Hwange	376,963	376,963	2	1	20	18	93	13,980
Mbire	781,000	898,000	6	0	17	9	328	12,302
Nyaminyami	369,931	140,000	3	3	12	6	62	5,875
Tsholotsho	833,600	410,000	2	1	22	11	70	10,967
Total	**9,265,667**	**3,754,167**	**26**	**8**	**224**	**104**	**737**	**85,847**

4.1.2 Human resources and equipment employed at the District Level

Each of the RDCs employ staff to manage the CAMPFIRE program in their Districts. The number of people employed and the roles that they play is dependent on the level of income generated by the CAMPFIRE program. The core function of these staff is to monitor wildlife related activities in their respective areas, notably recording and dealing with human and wildlife conflict, coordinating meetings at the Ward level and monitoring outfitter hunting activities.

Most RDCs employ Game Scouts to conduct routine patrols and undertake basic law enforcement activities. In most cases this is low key since the CAMPFIRE program relies on members of the community to report incidents of wildlife crime, and any other matters related to wildlife in their respective Wards and villages.

Table 5: Summary of Human Resources Employed at District Level.

District	Wildlife Managers	Wildlife Officers	Game Scouts	Employees	Patrol Days
Beit Bridge	2	0	0	76	0
Binga	2	0	9	0	48
Bulilima	1	0	4	5	24
Chipinge	1	0	10	0	365
Chiredzi	2	0	8	8	91
Hurungwe	1	1	4	0	31
Hwange	1	0	6	0	144
Mbire	2	0	21	50	255
Nyaminyami	1	0	23	46	112
Tsholotsho	1	0	10	30	162
Total	**14**	**1**	**94**	**215**	**1231**

All RDCs have invested in various equipment that are employed on wildlife management activities. The number and type of equipment depends on the level of income and sophistication of the CAMPFIRE program. For example, the relatively wildlife endowed Mbire RDC has invested in a VHF radio system and camping gear for its scout force.

Table 6: Examples of equipment used in the CAMPFIRE Districts.

District	Vehicle (4 x 4, pick up etc.)	Truck	Tractor	Trailer	Grader/Tow Grader	Motor cycle	Bicycles	Radio Base Station	Radio hand sets	Rifles	Tents	Other
Beit Bridge	2	-	-	-	-	-	-	-	-	7	-	-
Binga	1	-	-	-	-	-	-	-	-	-	-	-
Bulilima	1	1	-	-	-	-	2	-	-	-	-	-
Chiredzi	2	-	1	1	1	-	-	-	-	-	-	-
Chipinge	1	-	-	-	-	-	-	-	-	7	-	-
Hurungwe	1	-	-	-	-	-	-	-	-	-	-	-
Hwange	1	-	-	-	-	3	-	-	-	7	1	-
Mbire	3	-	-	-	-	2	20	6	15	-	23	8
Nyaminyami	1	-	-	-	-	-	-	-	-	27	-	10
Tsholotsho	2	-	-	-	-	-	-	-	-	-	-	-
Total	**15**	**1**	**1**	**1**	**1**	**5**	**22**	**6**	**15**	**48**	**24**	**18**

4.1.3 RDC expenditure

CAMPFIRE related expenditure over the 6-year period is approximately US$6.2 million (or US$1.0 million/year). Figure 7 represents a breakdown of how the RDCs utilize the income from hunting to support the CAMPFIRE Program in their respective areas. These can be broken down into Administration, Management and Law Enforcement which accounts for approximately 80% of the expenses (or approximately US$835,000/year). The remaining 20% are used to support various community benefits and are aggregated under Social Services, Compensation and Other[2] activities. This equates to approximately US$220,000/year.

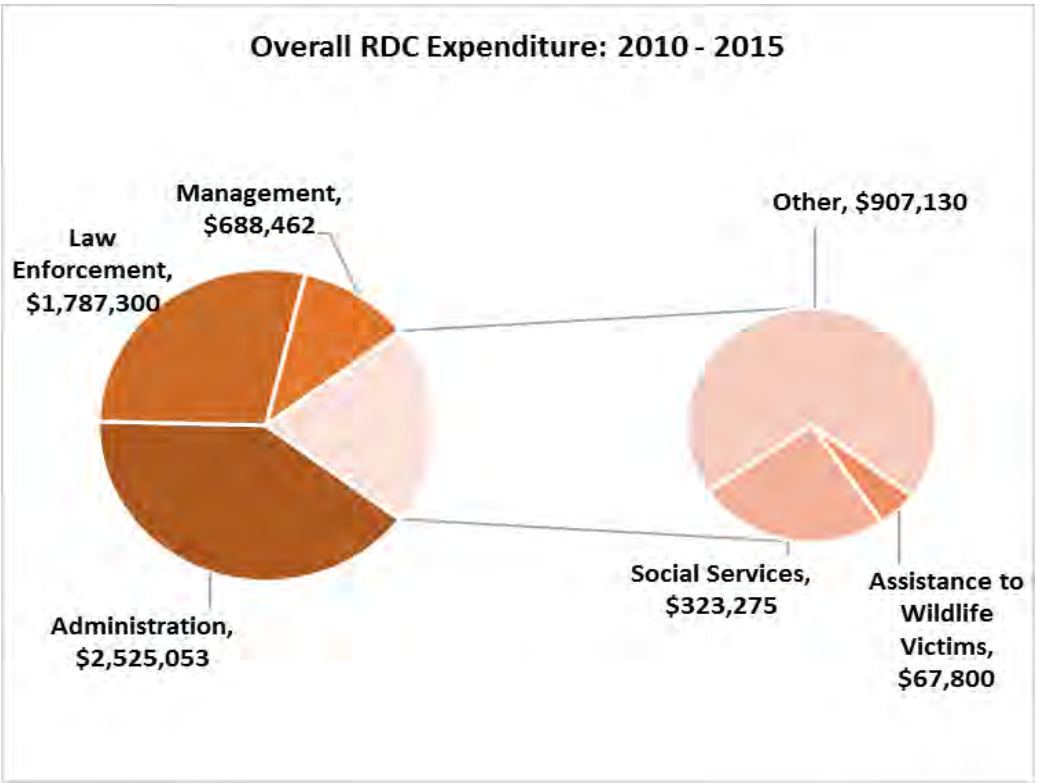

Figure 7: Breakdown of expenditure at the District level on CAMPFIRE program activities

A strategy employed by most RDCs is to invest more in activities related to the management and administration of the CAMPFIRE program rather than on social services. On average, 40% is spent on administration, 20% of law enforcement and 11% on management related expenses while 6% is allocated to support social services. There is no official national compensation scheme, however, RDCs and Wards (including outfitters) assist people and families who are injured or killed by wildlife.

4.2 PROFILE OF CAMPFIRE PRODUCER WARDS

[2] The "Other" activities have been skewed by the inclusion of a number of expenses registered by Mbire RDC that include construction and maintenance of staff housing, promoting and managing a community cattle production scheme and purchasing vehicles and office equipment.

The data presented here has been extracted from Tool 2. For ease of understanding, these are presented below as follows:

- Human resources and patrol effort
- Human and Wildlife Conflict
- Investment in equipment
- Expenditure

4.2.1 Human Resources, Patrol Effort and Equipment

Table 7 represents the decision that the CAMPFIRE producer Wards elect to invest in their respective CAMPFIRE Programs. Each Ward is required to establish a Wildlife Committee to which at least 7 members are elected from the villages located in that ward. Each Wildlife Committee employs several people either as ward based monitors or as Game Scouts. This workforce is responsible for approximately 2.6 million hectares of land and represents the 85,847 households that reside in the 737 villages.

The decision to invest in equipment is dictated by the level of income that each producer Ward receives, and the ability of the Ward to service and maintain the equipment in the long term. The records kept at the Ward level under estimate the number of patrol days (minimum 3,002/year) achieved.

Table 7: Average number of staff employed at the Ward level, patrol effort and investment in equipment

District	Number of Wildlife Committee members	Number of Employees paid by community	Number of Game Scouts paid by community	Patrol days per year	Equipment (e.g., vehicles, tractors, grinding mills)	Concession Area (Ha)	Number of Villages	Number of Households
Beit Bridge	66	1	3	152	1	324,300	15	5,070
Binga	7	-	-	-	-	364,000	51	19,474
Bulilima	-	-	100	7	-	193,984	51	7,767
Chiredzi	56	32	-	-	3	N/A	52	9,461
Chipinge	9	5	5	1,584	4	9,400	15	951
Hwange	49	-	-	-	-	342,750	93	13,980
Mbire	76	90	48	1,259	19	898,000	328	12,302
Nyaminyami	45	30	12	-	-	140,000	62	5,875
Tsholotsho	77	2	-	-	1	410,000	70	10,967
Total	**385**	**161**	**168**	**3,002**	**28**	**2,682,434**	**737**	**85,847**

4.2.2 Human and Wildlife Conflict and Problem Animal Control

Communities living in CAMPFIRE areas are on the front line and are required to deal with wildlife problems almost on a daily basis. Table 8 below provides a summary of the magnitude of human and wildlife conflict (HWC) recorded over a 6-year period (2010 – 2015) in 9 CAMPFIRE Districts.

Conflict with wildlife falls under two areas: crop damage and livestock deaths. While there are many other wildlife species responsible for crop damage (baboons, monkeys, bushpig, rats, quelea birds etc.), elephant are considered the greatest threat and problem.

Although the data are incomplete, it is estimated that 7,000ha of crops were destroyed by elephant during the 6-year period under review. It is not possible to accurately place a monetary value to this because crop production varies greatly from one year to the next, and from one region to another. It is important however to take into consideration that the impact of crop destruction in the highly prone drought areas and areas of low rainfall (e.g. Beit Bridge, Binga, Tsholotsho) is more acute than in areas where crop production may be higher. To place this into perspective, the national average maize yield is estimated at 300 – 600kg/ha, and the minimum cash value is US$180/ton[3]. The approximate value of the maize lost is therefore US$500,000 – US$1.0 million. Applying this to livestock losses, the average price of cattle is US$400 – US$700/head depending on the time of year and condition of the livestock. Lion and crocodile are responsible for most cattle deaths and at these prices, the value of stock lost to these predators is US$500,000 – US$1.0 million. Hyena equally destroy cattle but are more likely to kill small livestock (goats, sheep). At US$75 – US$125/head, the minimum cost of predation on small livestock is estimated at US$170,000 – US$300,000 (Table 8).

Table 8: Summary of the extent of human – wildlife conflict recorded in CAMPFIRE Wards: 2010 - 2015

District	Crop Damage (estimated Ha)			Livestock killed (cattle, goats, sheep)				Human deaths
	Elephant	Hippo	Buffalo	Lion	Leopard	Crocodile	Hyena	
Beit Bridge	268	-	1	3	-	-	30	4
Binga	26	35	-	1	-	32	29	7
Bulilima	522	-	-	5	-	-	231	-
Chiredzi	18	9	-	122	-	21	-	2
Chipinge	22	10	-	5	-	7	-	7
Hwange	461	-	-	71	2	15	-	2
Mbire	3,878	475	1,146	426	52	416	1,870	53
Nyaminyami	1,216	49	102	59	6	9	-	13
Tsholotsho	1,085	-	20	175	19	-	211	8
Total	**7,495**	**578**	**1,269**	**867**	**79**	**500**	**2,371**	**96**
	9,342ha			**3,817**				
Cost (US$)	**@300kg/ha*$180/ton**		**$504,473**	**Cattle@$400 - $700/head**		**$546,800 - $1,040,400**		
	@600kg/ha*$180/ton		**$1,008,947**	**Small livestock@$75 - $125/head**		**$177,825 - $296,375**		

Communities who live with wildlife also pay the ultimate price and 96 people have lost their lives and others injured after encountering dangerous animals. Crocodile and hippo are responsible for most human deaths and injuries but there are many incidents where elephant have killed and maimed people who were tending their fields or traversing wildlife areas.

[3] Note: the official price for maize is approximately $350/ton but sellers rarely receive this price from the millers and other interested buyers.

Table 9 summarizes the incidents of problem animal control and illegal activities recorded in the 9 major CAMPFIRE RDCs (data extracted from The Proceedings of the CAMPFIRE workshop, Gandiwa et. al. 2014).

Table 9: Summary of problem elephant destroyed and through illegal activities in 9 CAMPFIRE Districts

	2009	2010	2011	2012	2013	2014	Total
Conflict	250	283	340	208	295	478	**1854**
PAC	55	66	41	33	36	66	**297**
Illegal	7	14	12	11	16	19	**79**

It is not unexpected that local communities will seek to mitigate these losses either through retaliatory killings (this applies mostly to the carnivores) or through removal of problem animals. With respect to elephant, it is important to understand the relationship between trophy hunting, problem animal control and illegal offtake. The interactions amongst all three variables are not simply additive. For example, a relatively small offtake of problem animals can have a significant influence on the mean tusk weight of hunting trophies taken from the population and, hence, the income derived from hunting. Martin (pers. comm.) uses a population simulation model (Craig et. al. 2011) to carry out an analysis to examine these interactions. This model assumes that Problem Animal Control (PAC) is selective, and that most of the elephants killed are males between the ages of 13-36 years old and females between the ages of 22-42 years old. Moreover, more males are killed than females (5:1).

Martin demonstrates that the combined effect of trophy hunting quotas and level of PAC shows that in a scenario where there is no PAC, trophy hunting quotas can be set ranging from 0.1 - 0.6 % of the population. However, as PAC increases, so the trophy hunting quotas must be decreased to maintain trophy quality. The magnitude of the changes caused by relatively minor increments in PAC are highly significant. The modelling shows that increases in the trophy hunting quotas and PAC offtake causes only a minor drop in the rate of increase of the population which remains above 4% per annum, however, if the PAC offtake exceeds 1% of the population, then hunting quotas should not exceed 0.1% of the population. Unless these ratios are maintained, there is a real risk that the elephant populations will decline with the consequential loss of income from sport hunting.

Currently Zimbabwe adheres to quotas set at 0.3 – 0.4% of the population, and slightly higher in the CAMPFIRE areas. The PAC levels shown in Table 9 do not approach these critical thresholds, however, close attention needs to be paid to trophy quality and age (see discussion of elephant hunting in Mbire - in The Proceedings of the CAMPFIRE workshop, Gandiwa et. al. 2014).

4.2.3 Beneficiaries of CAMPFIRE Income at the Ward Level

The beneficiaries of revenues from the CAMPFIRE program are the community's resident in the producer Wards. However, the volume of people residing in these areas precludes providing individuals with direct dividends since the value of such dividends would be meaningless. The CAMPFIRE wards have therefore elected to invest in projects that provide social services to the whole community and only in special circumstances are dividends paid out for food security and direct cash benefits.

Table 10: Examples of Social Services funded in selected CAMPFIRE areas from Ward Revenues generated from sport hunting: 2010-15

District	Project
Beitbridge	Rehabilitation of schools, clinics and protection of irrigation schemes
Bililima	Rehabilitation of 3 clinics and 3 primary schools, hall, fencing of fields and rehabilitation of lodge, community truck, tractor, dam repair machinery.
Chipinge	3 grinding mills, lorry, teachers houses, community office, shop
Chiredzi	Clinic, teachers' houses, primary school, community-grinding mill, Police sub-office, piped water and electrification of clinic.
Hurungwe	Construction of classroom block Nyamakate Secondary, Maintenance of Nyamakate bridge. Purchase of tractor tube, payment of carpenters, Roofing Chipfuko Primary School and Huyo Secondary School, CAMPFIRE Ward tractor major service, Purchase of Treasurers bicycle, Payment of Nyamakate Clinic guard, 7 resource monitors allowances, 26 bag cement Chitindiva, Kabidza , Manyenyedzi and Mawau schools for toilets construction, renovation Karuru School (5 bags cement), and toilet construction, Chitindiva Clinic toilet construction, Roofing Chikova Secondary School, Purchase of buiding materials Chikova Secondary Block, Painting Dete Primary School, Building toilets Makwiye school, Building shed Mupuse school, Roofing Bhashungwe primary school, Sanyati Bridge camp renovation, Purchase of Cement Tashinga Primary School, 6 pairs uniform for resource monitors, Purchase of 20 bags cement Chisipite Primary School, Purchase of tires for Ward tractor, Bridge maintenance
Mbire	Clinic, nurse's houses, office, storerooms, 14 classrooms, 7 teachers houses, grinding mill, school office, wildlife administration offices, 2 hand pump boreholes, water piping, toilet, water storage tanks, 2 tractors, a basic tourist camp with 4 chalets;
Nyaminyami	Tillage tractors, renovation of dispensary at clinic, nurse's house. Construction of Mayovhe classroom block, 3 grinding mills, Teacher's house, Jongola school. School bursaries x 3 students at Seke Teacher's College. Renovation of pre-schools x 2. Negande: Rehabilitation of water pipeline, grinding mill. Nebiri: Chikuro primary block, rehabilitation of Harudziva water pipeline. Kasvisva: Rehabilitation of water pipeline to supply water to Kasvisva clinic, Kasvisva Secondary school block. Msampa: Teacher's house, Majazu primary, renovation of ward warehouse; Kanyati: Cement for teacher's house renovation.
Tsholotsho	Classroom blocks and furniture (Sihazela, Mlevu, Mtshwayeli, Ntulula, Dibutibu, Gwaai, Nkwizhi, Zibalongwe, Malindi, Mgodimasili, Phelela, Mpilo, Jimila, and Kapane Primary schools), 2 F14 cottages, 10 sewing machines (Dibutibu Secondary school), 7km piped water system for Thembile primary school, Sikente Clinic, Tshitatshawa and Jowa clinics construction, fencing of Madlangombe clinic, 10 water engines, borehole drilling and repairs and repair kits, Lister diesel engines for 6 villages in ward 21 and at Sihazela Line in ward 1, grinding mills, solar water pumping in wards 1, 2 and 4. 2 pickup trucks for wildlife monitoring purchased in 2015.

Figure 8 summaries the distribution of the US$5.4 million that Wards in 9 CAMPFIRE areas received over the 6-year period under review (2010 – 2015). As with the District expenditure, the Ward Wildlife Committees allocate 42% of the funds (US$2.2 million) for administrative functions (i.e. Meetings and Administration, Wages and Salaries, Management and Projects) and 55% of the funds (US$2.9 million) to

community benefits. Most of the funds are allocated to social services (US$2.4 million) that support schools, clinics and other infrastructure that benefit the whole community. Examples of this support are provided in Annex 1.

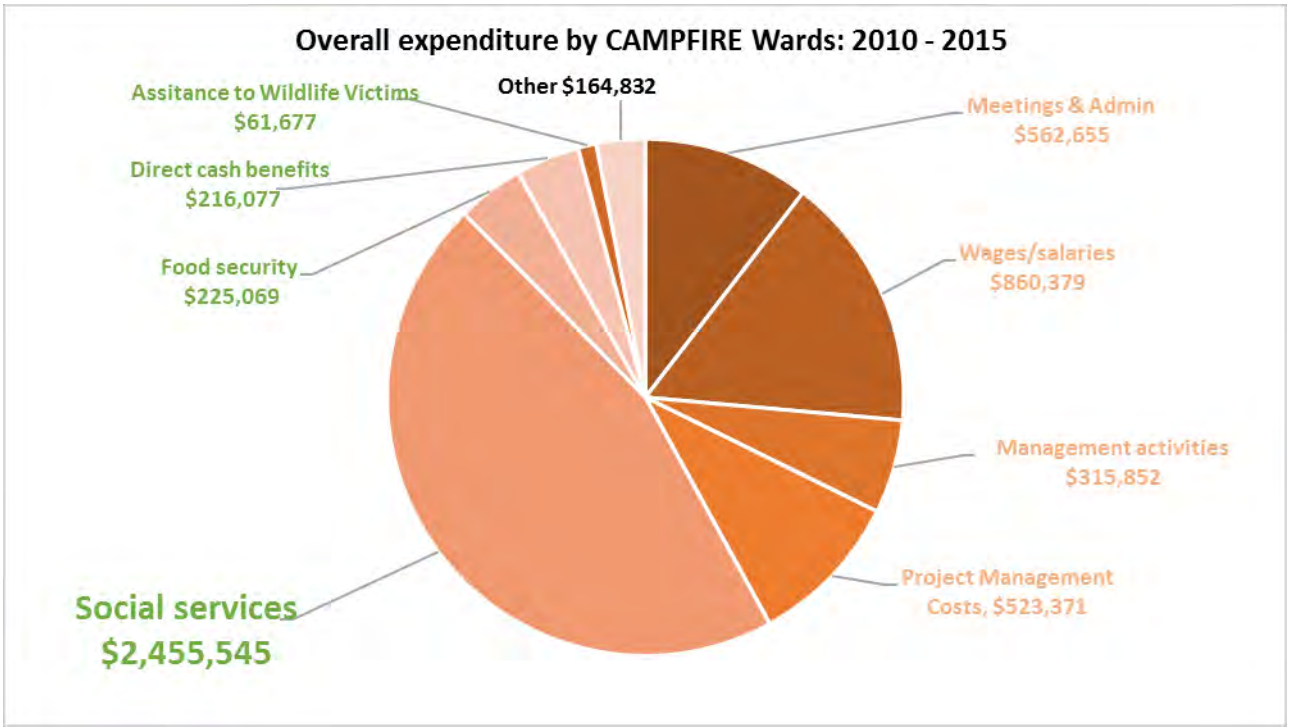

Figure 8: Allocation of Ward Campfire funds

5 IMPACT OF THE SUSPENSION OF ELEPHANT TROPHY IMPORTS TO THE UNITED STATES ON THE CAMPFIRE PROGRAM

The income to CAMPFIRE from the sustainable use of elephants has been declining since 2013, with 2014 registering a significant drop following the announcement of the ban on ivory imports into America (Figure 9). Although the hunting industry responded by seeking alternative markets (e.g. Russia, Middle East), this trend continued through 2015 and unconfirmed reports suggest that the decline has continued in 2016.

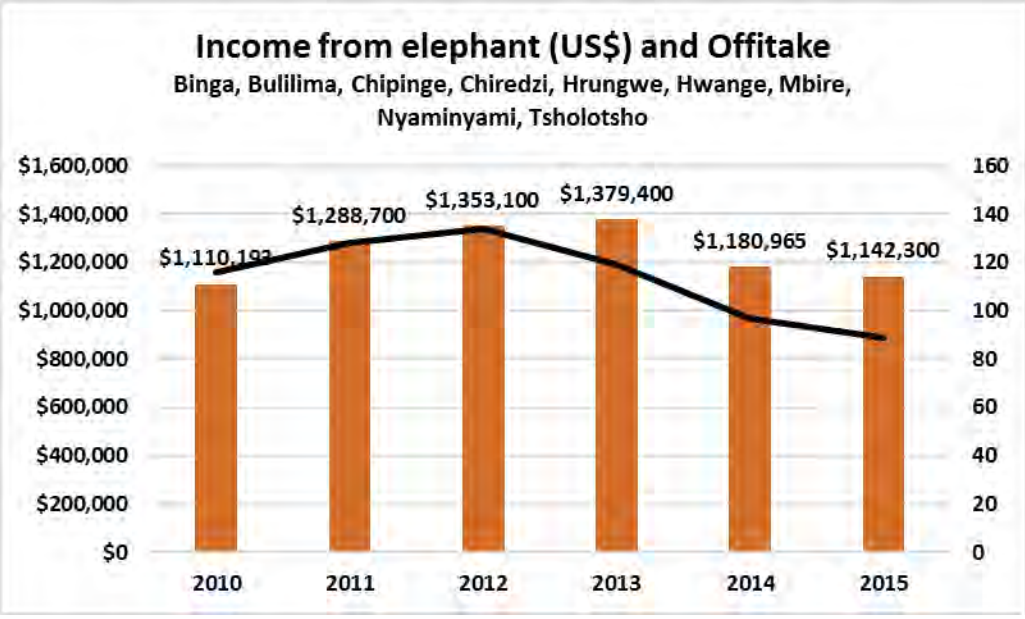

Figure 9: Annual income (US$) and offtake of elephants in 10 CAMPFIRE Districts

It is difficult to show concisely how the American ban on importation of elephant ivory from Zimbabwe has contributed to the decline in CAMPFIRE revenue and how hunting has enhanced the conservation of this species, due to the nature of the hunting industry in the CAMPFIRE areas. The hunting sector is integrated across a wide range of socio-economic activities and withdrawing one segment adversely affects a range of other wildlife based activities. Several indicators are provided here to demonstrate this:

1. The US suspension of ivory imports from Zimbabwe has had a significant impact on CAMPFIRE, and resulted in the cancellation of 108 out of 189 (57%) elephant hunts in all major districts initially booked by US citizens in 2014. The net impact of this was a reduction of CAMPFIRE income for all areas from US$2.2m in 2013 to US$1.7m in 2014. A similar pattern prevailed in 2015 (US$1.6m), and a further decline is anticipated in 2016 where outfitters struggled to sell elephant safaris and those that did had to heavily discount their prices.
2. The key trophy species (elephant, buffalo, leopard, hippo, crocodile and lion) contribute approximately US$1.2 million/year to CAMPFIRE revenues. Elephant account for 64% of these fees.

3. Quota utilisation of elephant prior to the ban did not exceed 60% of the CAMPFIRE quota allocation.
4. American hunters make up 53% of the clients in CAMPFIRE areas.
5. CAMPFIRE producer Wards receive on average 57% of all trophy revenues.
6. The CAMPFIRE hunting industry in the 9 RDCs covered in this analysis directly supports 104 producer Wards, representing 737 villages or 85,847 households.
7. The CAMPFIRE program employs managers, officers and game scouts at both the District and Ward level who are responsible for monitoring wildlife based land use activities in their areas and these are directly paid from safari hunting income.
8. Both RDCs and Wards invest in a variety of equipment that benefits communities and wildlife management. The operational and maintenance costs for this equipment are drawn from safari hunting income.
9. RDCs utilise 80% of the CAMPFIRE revenues to support administration and management of the program. 20% is invested in global social services that benefit communities at the District level.
10. Producer Wards, representing approximately 2.6 million hectares, bear the cost of living with wildlife. Under the 6-year period under review, elephants are responsible for the destruction of approximately 7,000ha of croplands in the 9 Districts. The minimum cost of this in terms of food production is estimated at US$500,000 – US$1.0 million.
11. Producer Wards have elected to invest 55% of their dividends from CAMPFIRE revenues in social services (schools, clinics etc.). 74% of these revenues are generated through trophy fees where elephant play a significant role.
12. Although CAMPFIRE communities suffer most from elephant crop damage, the number of elephant destroyed as problem animals is well within acceptable limits and with few exceptions, has little or no impact on population numbers.

In conclusion, the CAMPFIRE program relies almost exclusively on revenues generated through hunting. These revenues cannot be replaced through alternative wildlife based activities. This places almost two million hectares of wild land at risk, including the risk of increasing retaliatory killing through poisoning and illegal wildlife crime.

Wildlife in Communal Lands is under pressure. Removing any benefits will tip the balance and disgruntled CAMPFIRE communities will turn to pastoralism and unsustainable agricultural practices, thereby reducing wildlife habitat. The suspension of trophy imports is effectively encouraging communities to become willing tools for poaching – a forced abandonment of CAMPFIRE.

6 THE WAY FORWARD

The ZPWMA has recently developed and approved its 5-year Elephant Management Plan (ZPWMA, 2015). This plan recognizes that if elephants are to survive in the future, they must have a value, both to the governing authorities and to the local people. Unless the local communities, who live closest to elephants, are tolerant of this charismatic yet destructive species, it is unlikely that they will survive in the long term.

The Elephant Management Plan recognizes that "*regulated sport hunting converts wildlife into assets for the benefit of local people and the country as a whole. Wildlife can be a most valuable asset and in turn empower local communities and provide basic necessities. When it is viewed as a valuable asset, wildlife becomes an economically competitive land use in Zimbabwe, which leads to habitat preservation instead of habitat destruction and conversion to agriculture or livestock production*."

The presence of regulated hunting can also reduce illegal activities, and private outfitters' lease agreements are being reviewed to include anti-poaching as an obligation of the concessionaire. Trophy hunting revenues are vital to facilitating not only law enforcement activities but also general wildlife management. Alternative wildlife land use practices, e.g. eco-tourism, cannot generate sufficient revenues to cover these costs, and certainly not to justify wildlife as a land use outside of protected areas.

Hunting can generate revenues under a wider range of scenarios than eco-tourism, including in remote areas lacking infra-structure, attractive scenery, or high densities of viewable wildlife. Consequently, elephant and other wildlife populations will be negatively affected through reduced conservation efforts arising from low funding and reduced goodwill from the communities.

CAMPFIRE has been widely regarded as one of Africa's most successful contemporary conservation initiatives. Hunting of elephants plays an integral part in promoting CAMPFIRE as it permits the residents of communal lands to share in the benefits generated by wildlife utilization on those lands.

As shown above, the bulk of CAMPFIRE's revenue comes from hunting, with elephant hunting contributing more than 60% of annual revenue. The current revenue sharing guidelines require safari outfitters to pay revenue directly into community-controlled bank accounts and this has had a positive impact on community attitudes to wildlife conservation. These funds have been used by RDCs and producer Wards to promote wildlife conservation, but despite its achievements, CAMPFIRE still faces fundamental challenges.

The most crucial of these challenges is developing strategies to accommodate the increasing human populations averaging 16-20 people per km^2 in some key CAMPFIRE areas. Understandably, the focus of these households is on food security requiring the extension of basic agricultural schemes and increased livestock numbers. Such land uses are incompatible with wildlife based land use.

Other CAMPFIRE challenges include: (i) the downturn in Zimbabwe's economy and tourism sector post-2000, (ii) great reliance on consumptive trophy hunting and less focus on other uses and non-consumptive uses of natural resources due to viability considerations, and (iii) low re-investment in development, fixed assets, human capital, and management and protection of wildlife in CAMPFIRE areas.

Despite these challenges, CAMPFIRE stands very high in the agenda of Zimbabwe's Government, and an evaluation dedicated to improving the program is ongoing and should be finalized by the end of 2017. Zimbabwe's Government recognizes that the survival of wild animals depends entirely on those among whom they live. Unless local people want to save them, wildlife will be poached to the point where just a few remain in fortified reserves. CAMPFIRE is meant to avoid this and the future of wildlife in communal areas rests on the success of this program.

The hunting of elephants, under sustainable and well-regulated conditions, has the potential to raise adequate funds to support itself and other species in CAMPFIRE areas. For these reasons, Zimbabwe confirms its commitment to the sustainable use of elephant and other wildlife in its Elephant Management Plan, and recognizes the role that elephant play in the CAMPFIRE program.

7 ANNEX 1: EXAMPLES OF SOCIAL SERVICES PROJECTS SUPPORTED BY CAMPFIRE FUNDS AT THE DISTRICT AND WARD LEVEL

CHINONGE WARD Binga District: Clinic under construction and example of Ward bank statement.

Results 1 - 11 of 11

Account Statement
Account : 103000008919
Customer : 174696
Address 1 CHINONGE WARD CAMPFIRE FUND
Address 2 CHINONGE WARD CAMPFIRE FUND
Address 3 BOX 23 BINGA

Currency : USD
Name : CHINONGE WARD CAMPFIRE FUND

Value date	Description	Reference	Post date	Debit	Credit	Amount
	Balance at Period Start				3,030.45	
16 SEP 14	Cash Withdrawal Charge 06011533Z06 NEVER NDLOVU	TT14259HDYZH	16 SEP 14	-29.30		3,001.15
16 SEP 14	Cash Withdrawal 06011533Z06 NEVER NDLOVU	TT14259HDYZH	16 SEP 14	-2,930.00		71.15
01 OCT 14	Ledger Fees	103000008919-2014093	30 SEP 14	-12.50		58.65
01 OCT 14	Service Fees 103000008919	103000008919.SERVICE	30 SEP 14	-2.00		56.65
01 NOV 14	Ledger Fees	103000008919-2014103	31 OCT 14	-12.50		44.15
01 NOV 14	Service Fees 103000008919	103000008919.SERVICE	31 OCT 14	-2.00		42.15
10 NOV 14	TRANSFER LODZI HUNTERS	FT143140JG30\TRE	10 NOV 14		2,800.00	2,842.15
10 NOV 14	TRANSFER	FT143150JG40\TRE	11 NOV 14	-2,800.00		42.15
10 NOV 14	TRANSFER LODZI HUNTERS	FT143150JG41\TRE	11 NOV 14		2,800.00	2,842.15
01 DEC 14	Ledger Fees	103000008919-2014113	29 NOV 14	-12.50		2,829.65
01 DEC 14	Service Fees 103000008919	103000008919.SERVICE	29 NOV 14	-2.00		2,827.65
	Balance at Period End				2,827.65	

Agriculture Development Bank of Zimbabwe AGRIBANK
16 DEC 2014
ENQUIRIES BINGA BRANCH

Beit Bridge CAMPFIRE Program: Masera Secondary School Classroom Block and Staff Housing

Tsholotsho RDC: CAMPFIRE Vehicles, Tshitatshawa Clinic under construction in Ward 8, Tsholotsho CAMPFIRE District Wildlife Committee, Hunting Camp, and solar powered 7km piped water scheme

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MIKE REPORT

LEVELS AND TRENDS OF ILLEGAL KILLING OF ELEPHANTS IN AFRICA TO 31 DECEMBER 2016 – PRELIMINARY FINDINGS

Background on MIKE

The CITES programme for Monitoring the Illegal Killing of Elephants, commonly known as MIKE, was established by the Conference of the Parties (CoP) to CITES at its 10th Meeting (Harare, 1997) in accordance with the provisions in Resolution Conf. 10.10 (Rev. CoP16) on Trade in elephant specimens. The MIKE Programme is managed by the CITES Secretariat under the supervision of the CITES Standing Committee. Since implementation began in 2001, the operation of the MIKE Programme in Africa has been possible thanks to the generous financial support of the European Union.

MIKE aims to inform and improve decision-making on elephants by measuring trends in levels of illegal killing of elephants, identifying factors associated with those trends, and building capacity for elephant management in range States. MIKE operates in a large sample of sites spread across elephant range in 30 countries in Africa and 13 countries in Asia. There are some 60 designated MIKE sites in Africa, which together hold an estimated 30 to 40% of the African elephant population, and 27 sites in Asia.

MIKE data is collected by ranger patrols in the field and other means in designated MIKE sites. When an elephant carcass is found, site personnel try to establish the cause of death and other details, such as sex and age of the animal, status of ivory and stage of decomposition of the carcass. This information is recorded in standardized carcass forms, details of which are then submitted to the MIKE Programme. A database of more than 15,900 carcass records has been assembled to date, providing the most substantial information base available for making a statistical analysis of the levels of illegal killing of elephants.

MIKE evaluates relative poaching levels based on the Proportion of Illegally Killed Elephants (PIKE), which is calculated as the number of illegally killed elephants found divided by the total number of elephant carcasses encountered by patrols or other means, aggregated by year for each site. Coupled with estimates of population size and natural mortality rates, PIKE can be used to estimate numbers of elephants killed and absolute poaching rates.

While PIKE provides a sensitive measure of poaching trends, it may be affected by a number of potential biases related to data quality, reporting rate, carcass detection probabilities, variation in natural mortality rates and other factors, and hence results need to be interpreted with caution. However, the fact that the quantitative results presented below are in good agreement with quantitative information available from other sources, such as the Elephant Trade Information System (ETIS) and the African Elephant Database of the IUCN/SSC African Elephant Specialist Group, gives confidence as to the robustness of the results.

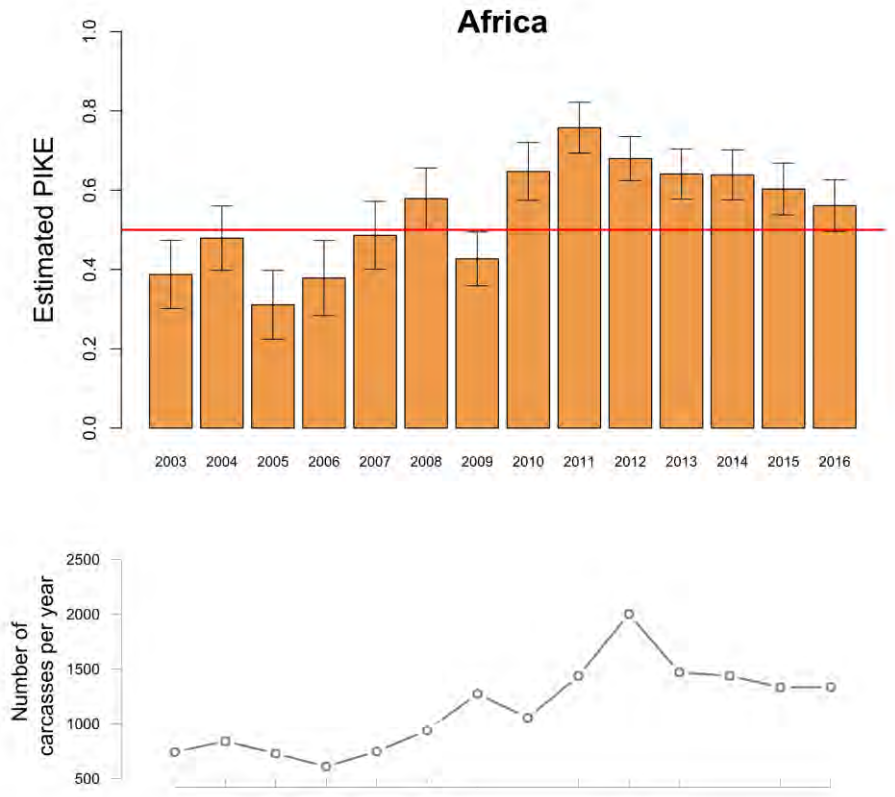
Details of the MIKE trend analysis for 2016

Trend analyses of MIKE data using standardized methodology have been presented to the 15th, 16th and 17th meetings of the Conference of the Parties to CITES, in 2010, 2013 and 2016 respectively; to the 61st, 62nd, 65th and 66th meetings of the CITES Standing Committee, as well as to other meetings such as the African Elephant Summit (Gaborone, December 2013) and the Kasane Conference on Illegal

Wildlife Trade (Kasane, March 2015). In addition, analyses of MIKE data have been published in the peer-reviewed scientific literature (Burn et al. 2011; Wittemyer et al. 2014).

Since the report submitted to the 17th meeting of the Conference of the Parties to CITES held in South Africa in September-October 2016, which included records received up to the end of 2015, records for 1,335 elephant carcasses encountered in the course of 2016 were received from 33 sites in Africa. Records are still being sought from sites that have not reported, as a result this report is a preliminary analysis based on records received up to 31 December 2016. While the number of reporting sites declined compared to 2015, when 38 sites reported, the number of carcass records received is comparable (see Fig 1, lower chart).

The data set used for analysis consists of 15,942 records of elephant carcasses found between 2003 and



the end of 2016 at 51 MIKE sites in 27 range States in Africa, representing a total of 539 site-years. Data for Asian sites is still being compiled and will be presented in the MIKE report to the 69th Meeting of the CITES Standing Committee, which will be held in Geneva, Switzerland, from 27 November to 1 December 2017.

Figure 1. The upper chart shows the PIKE trend in Africa with 90% confidence intervals, based on 15,942 elephant carcasses (illegally killed or otherwise) reported to MIKE for the period 2003-2016. PIKE levels above the horizontal line at 0.5 (i.e. where half of dead elephants found are deemed to have been illegally killed) are considered cause for concern. The lower graph shows the total number of carcasses reported by year, irrespective of cause of death. The total number of carcasses reported per year has remained relatively unchanged since 2013.

Figure 1 shows empirically derived time trends in PIKE at the continental level for reporting African MIKE sites, with 90% confidence intervals. The chart shows a steady increase in levels of illegal killing of elephants starting in 2006, peaking in 2011, and leveling off and slightly declining thereafter. As in 2015, the PIKE level shows a slight decline but the estimated poaching rate in 2016 remains high – that is above a PIKE value of a half, more elephants die from poaching that die from natural causes. This may imply that elephant population at MIKE sites overall is likely to have continued to decline in 2016.

It is difficult to estimate poaching impact at the site level, especially in sites that do not have sufficiently large carcass sample sizes, or where there may be indications of bias in reported PIKE levels or where climatic conditions have dramatically varied, such as drought. Uncharacteristically, in 2016 the number of carcass records from Tanzania dropped by 55% relative to 2015 from three MIKE sites (Katavi Rukwa, National Park & Game Reserve, Ruaha Rungwa, National Park & Game Reserve and Selous-Mikumi, Game Reserve and National Park). As of now no explanation has been received why there was a significant drop in the number of carcasses reported from these sites in Tanzania. The absolute number of carcass records from Kruger (South Africa) notably increased from 74 records in 2015 compared to 165 in 2016. While the number of illegally killed elephants reported remained almost the same: 30, in 2015 and 46 in 2016, the resulting PIKE value for Kruger declined from 0.41 to 0.2. This may be explained by two consecutive years of below average rainfall and potentially higher natural mortality rather than an actual decline in the poaching losses there.

Among sites that have reported 20 or more carcasses in 2016, where the site-level PIKE can be taken to be relatively reliable, those that remain of concern (with a PIKE of 0.7 or higher) in 2016 include Garamba (Democratic Republic of the Congo); Gourma (Mali); Odzala-Koukoua (Republic of the Congo) and Niassa (Mozambique). In a recent correspondence in Cell Biology (Poulsen, 2017), 161 carcasses of poached elephants between 2012 and 2015 were reported at Minikèbè N.P (Gabon). This MIKE site last reported in 2014 with a total of 63 illegally-killed carcasses between 2012-2014. If the published numbers are correct then a total of 98 (=161-63) illegally-killed carcasses have not been reported in 2015. As of now no official numbers for 2015 and 2016 have been reported to the MIKE programme.

From 2015 to 2016 PIKE levels changed at several sites. Among these, where the change in site-level PIKE can be taken to be relatively reliable - sufficiently large carcass sample size (an average of 20 or more carcasses across years) - were Dzanga-Sangha (Central African Republic) where PIKE dropped from 0.43 to 0.23 (a decrease of 20%), and Tsavo Conservation Area (Kenya), where PIKE declined by 11%; in contrast, in Gourma (Mali), PIKE increased from 0.77 in 2015 to 1.0 in 2016 (a 23% increase). Sites from South Africa and Tanzania, that had unusual reporting patterns from previous years (see above), were not included in the analysis.

The PIKE levels over the last three years are reflected at the sub-regional level, with the PIKE values in the African sub-regions in 2016 being statistically indistinguishable from those reported in 2015 except for Eastern Africa (Figure 2). In Eastern Africa, PIKE levels declined from 0.42 in 2015 to 0.30 in 2016. This decline is principally due to the PIKE-site level in Tsavo Conservation Area (Kenya) in 2016, coupled with the number of elephant carcasses (illegally killed or otherwise) reported (170). Systematic exclusion of carcass data from East African MIKE sites in 2016 from the analysis shows that the carcass numbers from Tsavo had the highest influence on the decline of PIKE from 2015 to 2016 for the sub region. Without the 2016 Tsavo data in the analysis PIKE changed from 0.42 in 2015 to 0.36, a 6% decrease in 2016 whereas including the Tsavo data, PIKE changed from 0.42 in 2015 to 0.30, a 12% decrease in 2016. This highlights that regional trends can be influenced by local change at a single site.

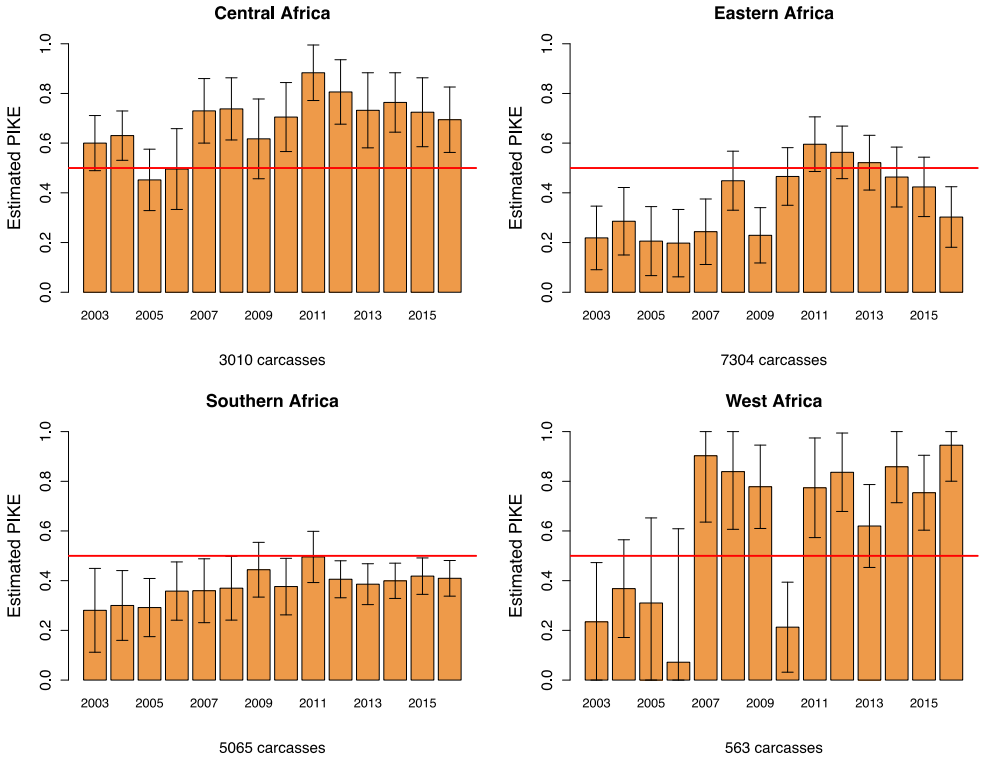


Figure 2. Sub regional PIKE trends with annual 90 % confidence intervals. The numbers of carcasses on which the graphs are based are shown at the bottom of each graph.

With only seven sites reporting data for 2016, West Africa continues to be a cause for concern in terms of data quantity and quality, making reliable inference on trends impossible for the sub-region.

Despite variation at the site level, poaching levels show a slight downward trend since 2011 at the continental scale, albeit at a potentially worrying levels, especially in Central Africa and specific sites in Eastern and Southern Africa. In West Africa, due to low reporting rates, it is hard to make reliable inference with the year over year trend.

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Zimbabwe: United States Ban Hits Campfire Revenues

06/04/2015 00:00:00

by Staff Reporter

A UNITED States ban on the importation of sport-hunted trophies of elephants from Zimbabwe has resulted in a significant dip in revenues for the Community Areas Management Programme for Indigenous Resources (CAMPFIRE), a report has indicated.

Established by the government in the 1980s, CAMPFIRE is a wildlife management programme under which local communities to sell hunting concessions to tour operators with the revenues used for communal development projects.

However, in April, 2014, the United States' Fish and Wildlife Service (Service) banned the import of sport-hunted black rhinoceros trophies from Namibia and prohibited Americans from bringing home elephant corpses after hunting and killing the animals in Zimbabwe.

The department recently lifted the ban on Namibia but indefinitely extended the Zimbabwe embargo "due to the inadequacy of information on Zimbabwe's

elephant management program, as well as lingering questions about law enforcement and the use of hunting revenues".

However, CAMPFIRE says its revenues have declined from $2, 2 million to $1,5 million due to the ban.

The organisation has been actively involved in elephant hunting for more than 20 years and exports of elephant trophies to the U.S. and other countries.

Seventy per-cent of CAMPFIRE's income comes from elephant hunting.

"The ban technically expired last April but the US has failed to announce its review to ascertain its position regarding 2015 imports," said a source at the organisation.

"The ban has caused a massive disruption of hunting revenue inflows to communities. It has negatively also affected investment into the protection of wildlife and removed direct incentives at community level."

NewZimbabwe.com was also told that the loss of revenues would adversely impact conservation activities in affected communities.

"The loss of this income stream will certainly increase the loss of confidence by communities in wildlife management, and consequently threaten tolerance and survival of elephants in communal areas," the source said.

The embargo has also affected the local tourism industry.

Hunters can earn as much as $2,000 a day helping clients from America, Eastern Europe and Spain shoot anything from antelope to lion and elephant, according to the Zimbabwe Parks and Wildlife Management Authority.

A client will pay about $30,000 in permit fees and for the hire of a professional hunter to get an elephant. A lion kill will likely cost a hunter about $55,000, according to the authority's guidelines.

Environment minister, Saviour Kasukuwere, said he believed the ban was an extension of U.S. sanctions against members of President Robert Mugabe's government and ruling party over alleged human rights violations.

"It's very unfortunate that they've extended their sanctions to animals as well," he said last year.

Jerry Gotora, chairman of the Zimbabwe Parks and Wildlife Authority, said the embargo would not help conservation efforts.

"This ban just encourages poachers," he said by phone. "It just doesn't make any

> sense."
>
> "As soon as you ban hunting, there's no income for the people and they resort to poaching," added South Africa-based hunter Lampies Bredenkamp.

http://allafrica.com/stories/201504070257.html

BUBYE VALLEY CONSERVANCY LION RESEARCH REPORT

Dr Byron du Preez [Oxford]
2016-01-12

INTRODUCTION

The United States Fish and Wildlife Service (USFWS) have recently evaluated the conservation status of the lion *Panthera leo* with particular regard to sport-hunting (http://www.fws.gov/endangered/what-we-do/lion.html – accessed 2015-01-08). The results of this evaluation have led to the formal protection of two subspecies under the Endangered Species Act, classifying *P. l. leo* as endangered and *P. l. melanochaita* as threatened. Together these subspecies apparently represent all of the lions in Africa (Barnett et al. 2014).

Sport-hunting is a legal activity that is both sanctioned and carefully controlled by the Convention on International Trade in Endangered Species of Wild Fauna and Flora (CITES). The USFWS found that the sport-hunting of *P. l. melanochaita* "if well managed, may provide a benefit to the subspecies" (http://www.fws.gov/endangered/what-we-do/lion.html – accessed 2015-01-08). Here we aim to explore this statement further and present data from a long-term *in situ* lion research project.

Please note that this is a preliminary report that just focuses on the Bubye Valley Conservancy in Zimbabwe. A more comprehensive report regarding the status of Zimbabwe's lion populations is currently being produced in collaboration with Dr Andrew Loveridge of Hwange National Park, Dr Rosemary Groom of the Save Valley Conservancy, Dr Peter Lindsey of Panthera, and Roseline Mandisodza-Chikerema of the Zimbabwe Parks and Wildlife Management Authority (ZPWMA), and of course Dr Byron du Preez of the Bubye Valley Conservancy.

LIONS *PANTHERA LEO* AND SPORT-HUNTING

The IUCN Red List have recently reclassified lions as Vulnerable (remaining as such since 1996; IUCN 2015), estimating that there are between 20,000 and 30,000 free-ranging lions left (Bauer et al. 2015) in less than 25% of their historic range (IUCN 2006). However, this generalised classification does not take into account an apparent conservation dichotomy: sample subpopulations of lions in Botswana, Namibia, South Africa and Zimbabwe have in fact increased overall (Bauer et al. 2015). Lions were historically present throughout Africa, some of Europe, the Middle East and Asia (Bauer and Van Der Merwe 2004), but current conservation strongholds remain only in parts of eastern and southern Africa (Brassine and Parker 2012; Nowell and Jackson 1996).

Lions are uniquely social felids, forming coalitions of up to nine males associated with female prides that may consist of 20 individuals or more (Macdonald et al. 2010; Schaller 1972). In the 1990's, lions were successfully (in terms of high reproductive and survival rates) reintroduced into private areas in parts of their former range (Miller and Funston

2014). However, this population growth rate inevitably led to the potential problem of overabundance (Funston 2008) and low genetic diversity (Trinkel et al. 2010), with both of these issues requiring active and intensive management (Hunter et al. 2007), and ultimately reducing the conservation value of these lion populations (Miller and Funston 2014). The ability to translocate lions originally facilitated the relief of overpopulation, but as the available areas for relocations were used up, sport-hunting and euthanasia have subsequently become the main methods of lion population control (Miller and Funston 2014).

The lion is the apex predator wherever it occurs (Macdonald et al. 2010), and is an ideal conservation umbrella; being large, charismatic and easily observable (e.g. Williams et al. 2000). The lion is important to commercial wildlife ventures, which risk losing significant market share where they cannot offer them to clients (Lindsey et al. 2007). The lion is thus prioritised in conservation, and their charisma exploited to attract tourists and raise the funds required in ensuring that wildlife areas remain viable (Lindsey et al. 2007). Lions are also a particularly valuable species in the sport-hunting industry, rivalled only in demand by buffalo *Syncerus caffer* and leopard *Panthera pardus* (Creel and Creel 1997). Lions are therefore prevalent in private wildlife areas (Packer et al. 2013), where their populations can achieve exponential growth rates given the protection and resources afforded by well-managed operations (Miller and Funston 2014).

There is more land area in Africa conserved for hunting than there is in all of Africa's formally protected areas combined: approximately 1.4 million km^2, which exceeds the total area covered by national parks by 22% (Lindsey et al. 2007). For wildlife conservation to be successful outside of national parks, these areas must be self-sufficient and able to generate sufficient revenue to cover the considerable costs of protecting the habitat and wildlife therein (Lindsey et al. 2006).

Hunting quotas are sanctioned by CITES on the basis that sport-hunting does not endanger the ultimate survival of the population. The positive aspects of sport-hunting as a conservation tool include a focus on males and a low percentage off-take; neither of which generally jeopardise populations, and also suggest that hunting could play a role in endangered species conservation (Leader-Williams et al. 2005).

An adaptive quota management system for lion hunting based on the ages of lions hunted was agreed on in July 2013 in Harare, Zimbabwe, during a meeting hosted by the Zimbabwe Parks and Wildlife Management Authority (ZPWMA) and the independent non-governmental conservation organisation Panthera. The points system is summarised in Table 1.

Table 1. Points allocated to hunting blocks arising from the harvest of lions of different ages under different quota regimes

	≥6 years	No trophy	5 years old	4 years old	<4 years	Failure to submit hunt

						return/incomplete hunt returns
For quotas of 3/more	4	3	3	2	-3	0
For quotas of 2	4	3	3	2	0	0
For quotas of 1	6	3	3	2	0	0
Quota setting process	These points are added up and divided by 3 to yield the quota for next year					

During 2013, operators were requested to submit hunt returns and photos as a trial run to get the system up and running. In 2014 operators were requested to do the same but were informed that the age of the lions hunted in 2014 would determine their lion quotas in 2015. The 2015 lion hunt results would thus also determine the 2016 quota.

THE BUBYE VALLEY CONSERVANCY

After originally being eradicated by cattle ranchers in the area, 13 lions were reintroduced to the Bubye Valley Conservancy in 1999, and four young males broke into the Conservancy that same year. From the original 17 animals present in 1999, the Bubye Valley Conservancy lion population was estimated at approximately 280 individuals in 2009 when robust population surveys were initiated by a team from the University of Oxford Wildlife Conservation Research Unit (WildCRU), and this population has continued to grow. Today it is estimated that there are over 500 lions on the Bubye Valley Conservancy.

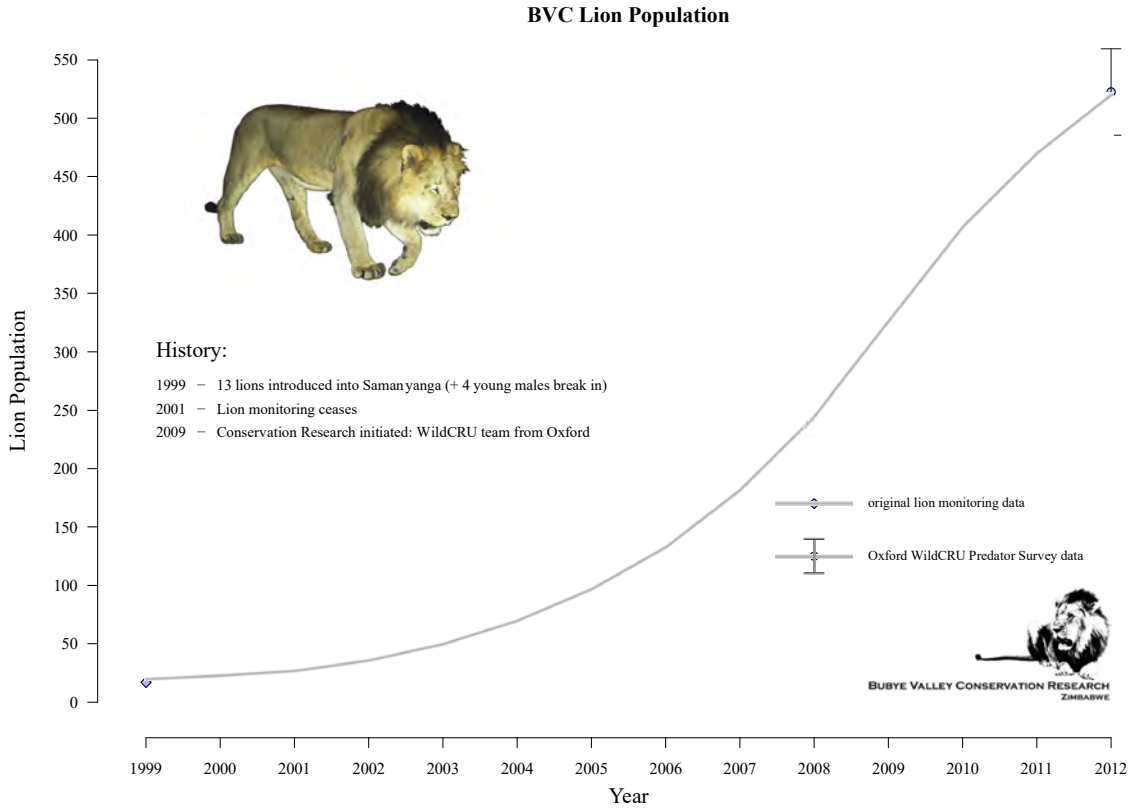

Figure 1: The Bubye Valley Conservancy lion population has increased exponentially since the original reintroduction of the species to the conservancy in 1999.

The exponentially increasing Bubye Valley Conservancy lion population currently exists at one of the highest densities in Africa (~0.190 lions km^{-2}: du Preez et al. 2015), greater than that of the Serengeti, Tanzania (0.100 lions km^{-2}: Pusey and Packer 1987; Spong 2002), Selous, Tanzania (0.080 – 0.130 lions km^{-2}: Creel and Creel 1996, 1997), Kruger National Park, South Africa (0.096 – 0.112 lions km^{-2}: Mills 1995), and Hwange National Park, Zimbabwe (0.027 lions km^{-2}: Loveridge et al. 2007). This equates to the largest contiguous lion population in Zimbabwe.

The Bubye Valley Conservancy offsets the cost of lion predation on its wildlife via sport-hunting of the species. In 2014, the lion hunting quota allocated to the Bubye Valley Conservancy by ZPWMA was 10 individuals. Based the fact that the entire quota was harvested and maximum points were scored for each individual trophy (more than six years in age), the allocated quota was raised to 13 lions for 2015. Only 12/13 lions were hunted in 2015 due to a late cancellation; nevertheless eight lions over six years old and four lions of five years old were harvested and the resultant points justifying a quota of 15 lions for 2016. Note that while the lion hunting quota for Zimbabwe has been voluntarily reduced by a national steering committee, the Bubye Valley Conservancy lion hunting quota has been successively raised twice based on hunt success and age of lions hunted under the *national adaptive quota management system*.

DISCUSSION

The saturation of lions in wildlife areas on both state and private land is positive for their future conservation security; but it is also critical to that of incidentally conserved endangered species, such as both species of rhinoceros (*Diceros bicornis* [black] and *Ceratotherium simum* [white]) on private wildlife conservancies in Zimbabwe (Lindsey et al. 2009; Suzuki 2001), which benefit from the same resources and protection that are incentivised and provided by the revenue generated from sport-hunting. The Bubye Valley Conservancy now boasts the world's third largest black rhinoceros population (N. Anderson [Lowveld Rhino Trust], pers. comm.). This remarkable achievement is an incidental conservation benefit derived entirely from trophy hunting activities – there are no photographic tourists visiting the Bubye Valley Conservancy, and these rhinos are not hunted. Having rhinos on the land therefore generates no revenue – and in fact there is a significant cost associated with protecting these animals. This expense is covered by the revenue generated by sport-hunting, with additional donations from the clients, and the habitat for the rhino is also preserved by maintaining the land as a conservation area, as opposed to converting it into agricultural or grazing land for example. The Bubye Valley Conservancy lion population has increased from an original 17 individuals in 1999 to over 500 in 2015 – not despite hunting, but because of the incentive provided by sport-hunting for their protection.

However, the high densities of lion populations achieved within commercial wildlife areas have the potential for intense intraguild persecution. Lions are aggressively competitive, and have been linked to reductions in cheetah (e.g. Durant 1998, 2000; Laurenson 1995) and wild dog (e.g. Creel 2001; Creel and Creel 1996; Vucetich and Creel 1999) densities, both of which face local extinction where lion abundance, and the respective level of persecution, is high. Excessive lion density may also result in population declines of ungulate prey (e.g. Wegge et al. 2009). It is vital to holistic conservation that wildlife managers can understand and deal with the level of impact that lions exert on other species; particularly those that are elusive difficult to observe, and which face decline if not carefully monitored. To this end, a conservation research initiative in partnership with WildCRU was established on the Bubye Valley Conservancy in 1999.

Based on the number of kills made (du Preez et al. *in prep*.) and the current value of the meat (K. Leathem, *pers. comm*.), the Bubye Valley Conservancy lion population consumes hundreds of thousands of dollars worth of prey each year. These lions are mainly tolerated because of their ability to generate the revenue that helps to offset this expense – although it is estimated that economically it is still not worth keeping the lions whose cost outweighs their value (Funston et al. 2013). If lion hunting were to be banned, based on the economics involved it would become unviable to continue managing the Bubye Valley Conservancy as a wildlife area in its current form, and lions would either have to be re-exterminated (or at least severely reduced via culling), or what is the largest privately owned wildlife area in the world would be converted back into a cattle ranching area (K. Leathem, *pers. comm*.). This is the reality of any business, in that it needs to cover costs and pay staff and cannot run at a loss for luxury of conservation. Childs (1993) states “A refusal to treat wildlife in the same way as other resources and maintenance of centralised protectionist management

prejudices its survival. Only by raising its commercial value will wildlife be able to compete for space on the scarce African landscape. Trade bans which detract from wildlife's commercial value prejudice its chances of survival in the long term."

The USFWS state "Well-managed conservation programs use trophy hunting revenues to sustain lion conservation, research and anti-poaching activities" (http://www.fws.gov/endangered/what-we-do/lion.html – accessed 2015-01-08). The Bubye Valley Conservancy meets each one of these points: clearly contributing to lion conservation with Zimbabwe's largest contiguous population; a long-term conservation research partnership with WildCRU; and with a self-funded anti-poaching unit that protects the world's third largest rhino population (the largest on private land).

The success of the Bubye Valley Conservancy, in terms of both its hunted lion and non-hunted rhino populations, provides the incentive for other areas in the country to sustainably manage their wildlife resource. Although the USFWS understandably categorises lion conservation by country rather than individual properties, the Bubye Valley Conservancy currently and deservedly hunts nearly a third of the total Zimbabwean lion quota. This sport-hunting does not negatively affect the lion population, which remains in positive growth despite the off-take.

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Anti poaching…fighting back

Anti poaching …fighting back

AFRICAN CONSERVANCIES ANTI-POACHING 2015

AFRICAN CONSERVANCIES

African Conservancies was established in 2014, it's first project was in Nyaminyami Rural District Council in the Omay Communal Land hunting area. A.C comprises Carbon Green International, the relevant Rural District Council and the relevant community in which the conservation plan falls. A trust has been formed that will include these parties as beneficieries.The primary goal of A.C was to locate a suitable area to form, build and manage a sustainable community conservation area. The Omay 1 hunting area between the Ume and Sengwa Rivers was selected as a perfect phase one. The criteria of selection includes; being communal land hunting area, fall within the C.G.I REDD+ project area.

OBJECTIVES OF AFRICAN CONSERVANCIES

The primary objective of A.C was to select an area within the REDD+

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project, (stretching from Binga to Kanyemba in the communal areas) and partner the community and council. The belief in building sustainable conservation areas and in particular enabling communities to truly and directly benefit from from this sustainable utilization is at the core of this project.

The immediate goals with the Ume River Community Conservation Area were to reduce hunting offtake and reduce poaching. The hunting offtake was reduced in 2014 and in 2015. For example, 2014 saw twelve buffalo being hunted from the quota of thirty five. 2015 we will have a buffalo offtake of ten from the possible thirty five. Having done our own numbers on the ground, our offtakes are very conservative and the population increase through relocation due no pressure is clearly visible with far better trophy quality.

Anti poaching began in 2014, the six C.G.I scouts based out of Manyuli camp close to the Gokwe boundary and six scouts based out the Ume hunting camp. We decided at the close of 2014 that the anti poaching was not having enough effect on the structured elephant poaching, so in March 2015 Steve Wentzel and I decided that it needed direction and management. So beginning March, I personally came into the Omay to oversee and manage the anti poaching teams.

I immediately amalgamated the two teams and brought in Mr. Charles Khumalo to head up this new team. Charles is ex Zimbabwean National Army, a brave, dedicated leader who has commanded not only the respect of this unit, but myself and the community at large.

We started in house training incorporating weapons training, tactical house clearances, offensive tracking and building a more intense unit that could cope with a far more aggressive natured outlook to the poaching problems. This immediately began to produce results.

Our focus has been on hardened armed poachers with the theory that the snare and dog meat poachers would be dealt with in the process of eliminating the more “serious” elements.

AREA OF OPERATIONS

Though we in theory are based in the Omay communal land, our operations stretch into Gokwe, around Chizarira and Charisa and Binga. due to our operations being outside of the National Parks we predominantly operate with Police details and R.D.C scouts. Our entire unit has now been accepted as Police reservists and are awaiting their Police force numbers. It has been agreed that our unit

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having been accepted as reservists, will establish a dedicated reaction team within the police force that I shall train and manage.

OPERATIONS

Begining 2014 we funded the basing of James Mcallwain from MAPP out our hunting camp in Chipfudze on the Southern boundary of the Matusadona National Park. The reasoning for this was obviously to maintain the Parks presence on this boundary, which was non existent due to lack of capacity. Secondarily, James was to establish an informant network that would offer up targets for our unit to react to. This was very effective and results were immediate.

With James leaving MAPP in August 2015, the MAPP trustees unfortunately decided to move their operations back into the Park. This led to a huge information breakdown and vacuum.

August 2015 Charles Khumalo was tasked in resurrecting and bettering the information networks as reacting to shots fired is almost a pointless affair. The poaching teams shoot toward last light, fifteen minutes from shots fired, the elephants face is chopped off and they are moving.There is no way to track them fast enough to catch them up at this stage. The needle in haystack affair is almost pointless for arresting poachers. There are over one hundred and fifty square kilometers of bush to patrol, it would require an army to do this. Our first goal was to bring into operations a full time intelligence operative whome we had been grooming for this position.

The informant/intelligence network has had significant effect, we have over one hundred and twenty people on our books. Over ninety percent of our arrests have occurred and been made possible through the capturing or paying for intel. We have put in place “watchers” who monitor targets and wait for opportunity to ensure arrests have hard tangible evidence for prosecution. “Mapani” whom he was second on our priority list and pulled the trigger on the three elephant days after the Sebungwe Action Plan Meeting; was monitored for four months prior to his arrest late October. Literally we actioned the arrest when his “watcher” informed us that he had begun drinking beer with tusks and firearms still being present. After four long months, he eventually made a mistake!

ARRESTS

Below are a list of arrests of hardened elephant poachers, I have omitted all of our lessor arrests of meat poachers.

February 7th 2015

Reaction to shots fired Matusadona southern boundary resulted in a joint op with Parks rangers with our tracker team. Poaching team ambushed and two armed poachers killed. One “John Raymond” being a casualty of this contact was fourth on our priority list. Firearm 303 recovered.

February 12th 2015

Sting operation on the Gokwe boundary resulted in the arrest of three “dealers” supplying arms and ammo to the poaching syndicates. One tusk, thirty rounds 303 and forty five 7.62 intermediate (AK 47) rounds recovered.

March 12th 2015

Contact and exchange of fire in Manyuli, no casualties but a 303 rifle recovered.

April 22nd 2015

Raid carried out on “Magura” syndicate whilst infiltrating. Arrests effected on entire team of four with recovery of 303 rifle.

April 23rd 2015

Intel from “Magura” arrests led to the arrest of “Mark Neberi” who was third on our priority list.

June 23rd 2015

“Jabu” syndicate shot and killed an elephant in the park on the late

FUTURE OPERATIONS

Future operations will continue in the Omay communal land, the hard hitting unit has had a serious effect on poaching syndicates. The informant network has reduced the “safety” factor for the syndicates. We are able to reach right into their homes and they have no secure areas to operate in.

The community outreach via the chiefs seems to be having an effect. Chief Negande has issued an order that anyone assisting poaching syndicates will be banished from the Omay. The subsequent banishing of two of his subjects over the last month has sent a very strong message about how serious he has become!

The upsurge in armed Zambian incursions in the lower Zambezi has us concerned with intel coming in of Zambian teams planning to operate here. The Cyanide is our major concern. Having only picked up poisoned fruit in July with no further cyanide incidents we were fairly relaxed about it. Subsequent to the MAPP arrest of the “Kariba” cyanide team, one of their members who escaped prosecution has been into our area. I am currently running a campaign in the community educating them of this problem. It is finally dawning on people that these elephant poachers will poison water sources that will not only kill elephant, but their livestock and families are at risk to.

As always, funding these operations and supplies of material are a constant battle. Carbon Green and Ume River Conservancy face the brunt of this funding with perpetual short falls. We rely on cell phones for communications, which is erratic at best! Firearms and ammunition have been supplied by me personally, again we are short if all members are in field. The idea of us tackling these teams with catapults and axes sounds ludicrous but is whats happening! So we are perpetually looking for help keeping the ball rolling.

Chris Moore

Ume River Conservancy

13th November 2015

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Sustainable off take benefiting communities

Sustainable off take

Since 2007 we have been involved in dedicated wildlife conservation through sustainable off take, quota control, anti poaching and community based wildlife education in the Omay campfire concession.

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The Omay (NyamiNyami RDC) is a vast (2 million acres) populated communal land which one of the first areas to be given the CAMPFIRE status, whereby local communities benefit from wildlife off take, it is not rocket science that this program works as we continue to see an increase in wildlife numbers in our area. Communities receive direct benefit both financially and through various projects implemented by Martin Pieters safaris such as clinics, schools, vehicles for anti poaching and the employment of scouts. It must be noted that the Nyaminyami RDC is a remote inhospitable concession that has no other land use model due to very erratic and low rainfalls, an abundance of mosquitos, tsetse flies and poor soils. The only benefit local people have, is to receive financial remuneration from hunting safari off take and employment.

We at Martin Pieters safaris, www.martinpieterssafaris.com employ locals in all our camps as well as a dedicated anti poaching team that works alongside the RDC (council), national parks, the police and the MAPP (Matusadonna anti poaching project), we continue to collect snares, arrest poachers and follow up on convictions and more importantly, educate people on the long term sustainable use of our national heritage. This method has been proven and several past poachers have turned tables and are now our most trusted wildlife officers, using their past notorious skills to help us protect our wildlife.

Every year several local villagers are killed or maimed by elephant, lion, buffalo, hippo and crocodile, they live in close proximity to these animals and only tolerate them because we as a hunting

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company give back to the community. It is very important for the protection of our wildlife in these remote areas that we continue to assist the RDC with anti poaching, continue to pay for the sustainable off take of a select quota, because if we do not, the locals will kill every animal, they will not tolerate wildlife disruptions to their families, be it through the destruction of their crops on an annual basis, or the loss of one of their family members.

Our wildlife populations are on the rise, we border the Matusadonna national park, there are no fences to stop animals movements, we are very much needed, even more so now with current rainfall patterns at their lowest, poaching will increase as people find it difficult to grow crops, we will not let the last 10 years of effort to protect our wildlife be a waste, we will not leave these villagers high and dry with no form of income or food.

We thank our hunters for their continued support. It is because of you that our conservation methods are successful.

We spend in excess of $ 40 000 / annum on anti poaching

We have collected over 15 000 wire snares since 2007 saving thousands of animals.

We assist in arrests of subsistence poachers and heavily armed

elephant poachers, we follow up with convictions so that these men and women can be put away and our animals will be safe.

We monitor game movements and patterns and adjust our quotas accordingly so that we continually have an increase for future generations

We have assisted in the construction of clinics, schools and information centers.

We employ over 30 locals in our camps and in the field thus as siting hundreds of locus through indirect benefits.

Last but not else, we pay over $ 200 000 in direct benefits annually to the RDC and the local wards for wildlife off take.

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Big game hunting in Zimbabwe……making a difference to communities

Hunting in Zimbabwe

When you think of Africa, what comes to your mind……lush plains,flowing rivers,animal migrations……big cats, safari lodges and kitted game drive vehicles, visions conjured up by numerous wildlife documentaries, dvd's showing exclusive photographic safaris with discerning clientele being pampered by attentive staff…….yes the scenes shown to us make us believe that all is well in Africa. Thats all very well, but realistically, Africa is not all about the above, there are many, many areas that have limited land use options, this is based on rainfall, wildlife numbers, accessibility and terrain. Most of these ' forgotten areas ' are not good enough for the photographic companies, no one wants to invest in the unknown, return on investment would be negative……, so what happens……

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Enter the safari operator,professional hunter and dedicated wildlife enthusiast……the client. Countless millions of dollars are poured into these areas annually throughout Africa by true conservationists, people who care about the preservation of our species for future generations. One such area (and there are many) is the Omay, Nyaminyami RDC, operated by Martin Pieters Safaris, www.martinpieterssafaris.com

For many years we have poured hunters dollars into this remote area, educating communities, conducting anti poaching actives, reintroduction and relocation of wildlife , construction of clinics and schools…… 9 years down the road, what do we have…….an area renowned for big game, a community that is happy and a generation that focuses on wildlife conservation and not poaching activities.

In 2014, African conservancies was born and plans for the Ume River Conservancy were laid on the table, further cementing the relationship between dedicated safari operators and the community, allowing them to be directly involved in wildlife based decisions. Plans are currently underway with approval from local government to create a large remote conservancy where sustainable off take of certain species will form the back bone of wildlife conservation. 2 years down the road, we are already seeing the results as populations of several species are increasing whilst poaching activities are decreasing.

There is a lot to be done, but by taking these positive steps, by involving the local residents, by making use of these ‘ remote and forgotten areas ‘, areas that are unsuitable for the typical pampered photo safari enthusiast……we will continue to turn them into areas teeming with wildlife, an area to be proud of……thank you to our hunters.

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Next time you are stuck in traffic, have a delayed flight or are shovelling snow off your porch…..close your eyes, dream of Africa, there is no better time to come hunting in Zimbabwe than today.

Our efforts today will be enjoyed by our children of tomorrow.

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RIFA SAFARI AREA – PRO SAFARIS AFRICA

Lion - *Panthera Leo*

Louis Muller

25th January 2016

Rifa Safari Area

Rifa forms part of the Hurungwe Safaris area in the north east of Zimbabwe in the upper Zambezi Valley. The escarpment is the southern boundary and therefore is in the Zambezi valley. Rifa is 615 km2 (Dunham & Mackie 2015)

Rifa boundaries Makuti Safari area to its South, Zambia to its West and North. Nyakasanga Safarir area is located between Mana Pools National Park and Rifa and is Rifa's Eastern Boundary.

Adaptive Lion Quota

Rifa has good prey base for Lion with the following population estimates:

2015	Ground Estimates
Buffalo	646
Lion	68
Hippo	300
Kudu	346
Eland	81
Impala	1829
Bushbuck	139
Hyena	285
Warthog	169
Waterbuck	41
Zebra	68
Sable	0

Population estimates are done with daily game sighting reports done by Professional Hunters and Game scouts.

Lion population is estimated at 68 as of August 2015. This is done with camera traps and spoor count done during the season.

Rifa Safari Area quota has been as follows since Pro Safaris has been the Lease holder

Lion Quota

	2008	2009	2010	2011	2012	2013	2014	2015
Approved Quota	2	2	2	2	2	2	2	2
Quota Taken	2	2	2	2	2	2	0	2

The aged based program was introduced 1ST January 2014, where Lions of 5 years or older are to be harvested. In 2014 season the Professional hunters did not feel that they had any Lion males on bait that they could comfortably call 5 years or older. The decision was made by the operator to not take the risk in fear of losing on tag for the following season.

In 2015 both Lions on quota were harvested as PH's became better in ageing and more importantly, Lions matured and numbers increased. The Lions were aged at the annual Lion ageing workshop conducted by ZPWMA and Panthera represented by Dr. P. Lindsey. Both Lions were aged at 5 years old, however Dr. Lindsey indicated that one was on the cusp of 5-6 years. The quota will remain at 2 for 2016.

Human-Lion Conflict

Rifa safari area is surrounded by safari areas and the Zambezi River. Lion – Human conflict is limited to the Border town of Chirundu. The only incident was in 2012 when a woman was killed by a Lioness. The lioness was killed.

Hunting as conservation and Lion contribution

	% of Turnover	
	2014	2015
Turnover	100%	
Elephant contribution	21%	
Lion contribution	12%	
Salaries	19%	
ZPWMA	39%	
Anti-poaching	6%	
Conservation	6%	
Cost Of Sales	6%	
Operating Costs	15%	
Meat	2%	

ZPWMA receive 39% of gross. From this they fund ZPWMA but also their own anti-poaching teams.

6% of gross is spent on anti-poaching funded by the operator to have his own anti-poaching unit, over above the ZPWMA anti-poaching teams. All efforts are co-ordinated by our team. Since there are no communities surrounding Rifa, there is minimal meat poaching. However due to a 48Km Zambezi River border with Zambia, Elephant poaching is rampant. This is due to ease of crossing back across and international border with little persecution. Meat poaching from Zambians is however simply not worth the risk vs the reward. Ivory, however is.

The conservation programs listed at 6% of gross are, water points installation, pipeline maintenance, water pumping, de-silting of water pans and donations in equipment to ZPWMA anti-poaching units.

Wages are at 19% and we employ 14 staff, 10 anti-poaching scouts, 3 Professional hunters, 6 trackers with an average of 5 dependants to each person. Total of 165 dependants. We also have a training program of training 2 staff members each year for a PH license.

Further meat in a Safari area belongs to the operator since there is no community. The meat is used as ration for staff and anti-poaching patrols including ZPWMA Rangers. Each person gets allocated 2kg meat every 6 days. Apart from our staff there will be a minimum of 2 sticks (3 Rangers) in Rifa at

any given time. Totalling to about : 4137kg Meat. Further we donate meat for state functions in order to prevent ZPWMA shooting animals for these functions. This meat comes to about 1000kg p. annum. Lastly all left over meat is donated to the Children's Home (Orphanage) in Karoi. This amounts to about 1000kg p. annum. The total value of meat not sold but rather donated comes to about US$12,250. This would amount to 2% of gross income.

Lion hunts contribute about 12% of total Gross. They are sold on 18 -28 day safaris. Due to not contributing a significant amount of days to the hunting calendar, the loss of Lion hunting will not really have an impact on our Cost of sales. Further operating costs are fixed and so are wages. The loss of Lion hunting would therefore have a 12% loss in gross, however it would leave the operator the choice to lose the existing 9% profit margin, or cut the existing 12% spending on conservation.

Either way, the outcome would have a detrimental effect to the conservation of Rifa Safari area.

USA vs Other markets

Since Pro Safaris has secured the lease in 2008, 12 Lions have been harvested. 9 have been sold to USA hunters vs 3 from other countries. This is 75% of our Lion hunting market. USA hunters is therefore a significant contributor and therefore creates demand far outweighing supply. We estimate we would have to drop our price by a minimum of 30%. This would mean Lion contribution to gross would drop to 8.4%.

This means conservation funding would be cut by 36%.

Rifa Safari area has a small quota on all species. Lion therefore is a major contributor to the conservation of Elephant and the habitat to all species. Even if we have to find other markets, the Loss of the US Hunters will have a major negative impact on the survival of the viability of this area as a wildlife area.

Sport-Hunting and Lion *Panthera leo* Conservation in Zimbabwe

Dr Byron du Preez[†1], Dr Rosemary Groom[‡2], Olivia Mufute[§3] and Roseline Mandisodza-Chikerema[¶3]

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January 31, 2016

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Summary of Steps Taken by Zimbabwe to Improve the Management of Lion Sport-Hunting

i – Banning of all lioness hunting in Zimbabwe

ii – Hunting moratoria around the Gonarezhou and Hwange National Parks

iii – Removal of fixed hunting quotas

iv – Age restrictions on sport-hunted lions

v – Scientifically-based adaptive quota management system

Summary of Lion Sport-Hunting's Contribution to Conservation

i – Lion sport-hunting contributes 33.9% to 42.4% of total revenue on private land

ii – Lion sport-hunting generates up to US$ 557 km^{-2}

iii – Anti-poaching (in particular that of rhinoceroses) costs ∼US$ 216 km^{-2}

Introduction

The United States Fish and Wildlife Service (USFWS) have recently evaluated the conservation status of the lion *Panthera leo* with particular regard to sport-hunting (http://www.fws.gov/endangered/what-we-do/lion.html [accessed 2015-01-19]). The results of this evaluation have led to the formal protection of two subspecies under the Endangered Species Act, classifying *P. l. leo* as endangered and *P. l. melanochaita* as threatened. Together these subspecies apparently represent all of the lions in Africa (Barnett et al. 2014).

Sport-hunting is a legal activity in which the international import/export of trophies is both sanctioned and carefully controlled by the Convention on International Trade in Endangered Species of Wild Fauna and Flora (CITES). The USFWS found that the sport-hunting of *P. l. melanochaita* "*if well managed, may provide a benefit to the subspecies*" (http://www.fws.gov/endangered/what-we-do/lion.html [accessed 2015-01-19]). Here we explore this statement further, and present data from three long-term *in situ* lion research projects; the Bubye Valley Conservation Research Initiative, Savé Val-

ley Conservancy Research, and the Hwange Lion Research Project.

The data presented in this report clearly illustrates the positive conservation benefit that well-managed trophy hunting of lions can have for the species, as well as the importance of hunting in maintaining the wildlife in an area; addressing Point 5 on page 3 of the Federal Fish and Wildlife Permit Application Form (Form 3-200-20) [i.e. "*Please be aware that the U.S. Fish and Wildlife Service must make a finding that your activities will enhance or benefit wild populations of the species involved. If you have any information that could support this finding (e.g., population status or trend data; how the funds from license/trophy fees will be spent; what portion of the hunting fee will support conservation), please submit such information on a separate page with your application*"].

Figure 1: The lions pictured here, known as Winston (*standing*) and Geronimo (*lying*), were both collared in March 2012 when they were the dominant males in the Matombosa area and have been continuously monitored ever since as part of the on-going long-term WildCRU Bubye Valley Conservation Research Initiative. In November 2015 Geronimo, who was approximately 9 years old, died after succumbing to injuries sustained from fighting with another male. Winston, also 9 years old, has since lost his dominant status, lost his territory to two 4.5 year old males, become nomadic and avoids contact with other males. As of this report being written, the recent litter of cubs that both Winston and Geronimo sired are still alive.

Most importantly, since July 2013 there has been a continuous self-imposed internal reform of the lion hunting industry in Zimbabwe that is actively participated in and supported by all of the relevant stakeholders, including; the Zimbabwe Parks and Wildlife Management Authority (ZPWMA), non-governmental organisations, professional hunters, safari operators, scientists and researchers.

Here we discuss the results of this process in terms of robust evidence regarding the sustainability and self-regulation of lion hunting in Zimbabwe.

Figure 2: Winston and Geronimo's cubs.

Lions – *Panthera leo*

The IUCN Red List have recently reclassified lions as Vulnerable (remaining as such since 1996; IUCN 2015), estimating that there are between 20,000 and 30,000 free-ranging lions left (Bauer et al. 2015a) in less than 25% of their historic range (IUCN 2006). However, this generalised classification does not take into account an apparent conservation dichotomy: sample subpopulations of lions in Botswana, Namibia, South Africa and Zimbabwe have in fact increased overall (Bauer et al. 2015a). Lions were historically present throughout Africa, some of Europe, the Middle East and Asia (Bauer and Van Der Merwe 2004), but current conservation strongholds remain only in parts of eastern

and southern Africa (Brassine and Parker 2012; Nowell and Jackson 1996). The current lion population estimate for Zimbabwe's major lion areas is approximately 2,600 individuals [Hwange-Matetsi Complex: 750, South Eastern Lowveld: 350, Gonarezhou National Park: 60, Malilangwe: 37, Savé Valley Conservancy: 284, Bubye Valley Conservancy: 500, Mid-Zambezi Valley Complex: 600], though the actual number would be larger if there were data available for the countries minor lion areas that are yet to be surveyed] (ZPWMA 2015).

The lion is a uniquely social felid, forming coalitions of up to nine males associated with one or more female prides that may consist of more than 20 individuals (Macdonald et al. 2010; Schaller 1972). Lions are infamously infanticidal (Schaller 1972), where males will kill unrelated cubs so as to bring the female into oestrus and present an opportunity to sire their own litter, which is often used as an argument against sport-hunting of the species (e.g. Packer et al. 2010), where it is feared that the removal of dominant males causes cub mortality that eventually results in lowered population recruitment and survival (Packer et al. 2009). Infanticide, however, does not result from sport-hunting when age-appropriate males, past their prime and no longer territorial or with dependent cubs, are harvested (Whitman et al. 2004). Moreover, the fission-fusion nature of lion society (Mosser and Packer 2009; Pusey and Packer 1987) means that infanticide may still occur when the dominant males are simply not present there and then to defend their cubs (B. du Preez, pers. obs.).

In the 1990's, lions were successfully reintroduced into private areas in parts of their former range, where they achieved high reproductive and survival rates (Miller and Funston 2014). However, the resultant population growth inevitably led to the potential problem of overabundance (Funston 2008) and low genetic diversity (Trinkel et al. 2010), with both of these issues requiring active and intensive management (Hunter et al. 2007) and ultimately reducing the conservation value of these lion populations (Miller and Funston 2014). The ability to translocate lions originally facilitated the relief of overpopulation, but as the available areas for relocations were used up, sport-hunting and euthanasia have subsequently become the main methods of lion population control (Miller and Funston 2014).

The lion is the apex predator wherever it occurs (Macdonald et al. 2010), and is an ideal conservation umbrella; being large, charismatic and easily observable (e.g. Williams et al. 2000). Lions are important to commercial wildlife ventures, which risk losing significant market share where they cannot offer them to clients (Lindsey et al. 2007), and are thus prioritised in conservation; exploiting their charisma to attract tourists and raise the funds required in ensuring that wildlife areas remain viable. The lion is also a particularly valuable species in the sport-hunting industry, rivalled only in demand by buffalo *Syncerus caffer* and leopard *Panthera pardus* (Creel and Creel 1997), and are therefore prevalent in private wildlife areas (Packer et al. 2013) where their populations can achieve exponential growth rates given the protection and resources afforded by well-managed operations (Smuts et al. 1978; Loveridge et al. 2007b; Kettles and Slotow 2009; Miller and Funston 2014).

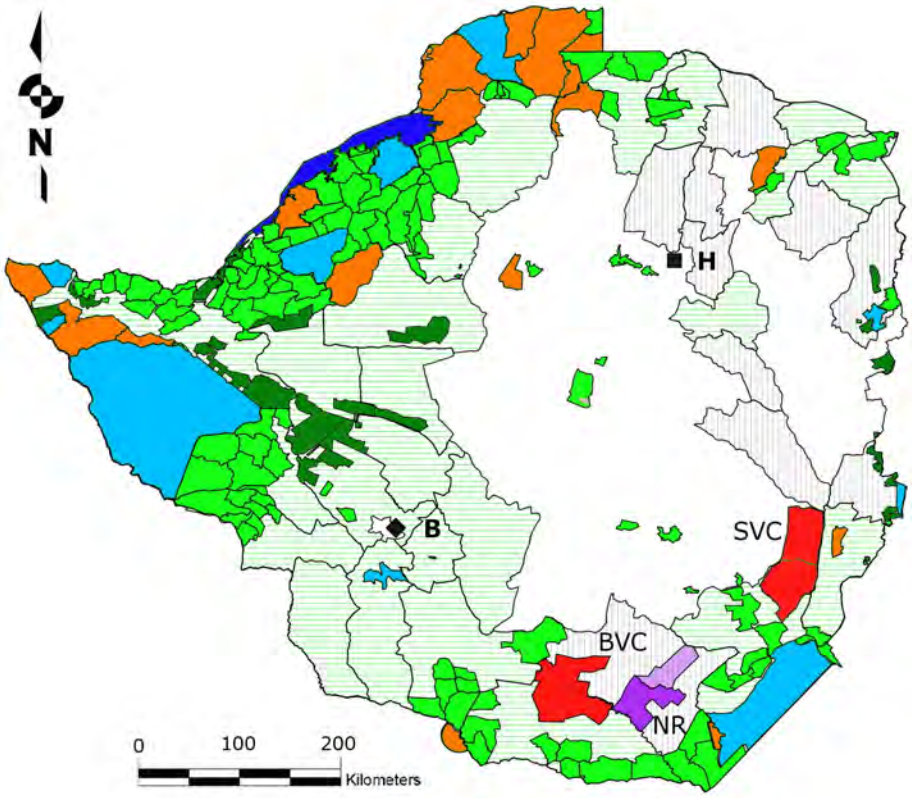

Figure 3: Map of Zimbabwe's main wildlife areas: [*i*] National Parks are represented in light blue; [*ii*] Safari areas are represented in orange; [*iii*] Forestry areas are represented in dark green; [*iv*] Community and Private wildlife areas are represented in light green; [*v*] Communal Land (CAMPFIRE Areas) in which sport-hunting may occur is represented by light green horizontal stripes; [*vi*] Communal Land in which sport-hunting does not occur is represented by grey vertical stripes. [*vii*] The Bubye Valley [BVC] and Savé Valley [SVC] Conservancies are represented in red. [*viii*]The Nuanetsi Ranch [NR] on which sport-hunting takes place is represented in dark purple (light purple represents the Nuanetsi Ranch cattle area); [*ix*] Lake Kariba is represented in dark blue. Harare (the capital city) is represented by a black square and letter '**H**'. Bulawayo is represented by a black diamond and letter '**B**'. Sport-hunting may occur in areas: *ii*, *iii*, *iv*, *v*, *vii* & *viii*

The ability of lions to rapidly increase in abundance is an aspect of their ecology that is often overlooked. Lion populations can achieve exponential growth rates (Miller and Funston 2015; Groom and Watermeyer 2015; du Preez et al. in prep.), and the problems associated with high lion densities fast present themselves and require significant investment in their solution (Hunter et al. 2007; Kettles and Slotow 2009; Loveridge et al. 2007; Packer et al. 2013; Smuts 1978). Whilst unregulated sport-hunting of lions (in particular that of dominant males and pride females) may result in population declines (e.g. Packer et al. 2010; Packer et al. 2009), restricting offtake to only males over

a certain age (i.e. have already bred and/or are no longer dominant) has no impact on lion population persistence, irrespective of quota size (Whitman et al. 2004). Such is the situation currently facing both the Bubye Valley and Savé Valley Conservancies, where the lion populations continue to grow despite sport-hunting and increasing quotas. Whilst sport-hunting may not alleviate over-population in these areas, it does somewhat offset the cost of keeping lions. Culling of lions may be the only realistic option for controlling numbers in larger areas, as the use of contraceptives is likely to be inefficient and expensive. Because of fears about public sentiment associated with sport-hunting, it has now become common practice for managers to cull excess lions in more than 45 wildlife areas in South Africa to which lions have been introduced, and which resulted in the wasteful destruction of about 200 lions in 2012 (Miller and Funston 2014).

Conservation and Sport-Hunting

There is more land area in Africa conserved for hunting than there is in all of Africa's formally protected areas combined: approximately 1.4 million km^2, which exceeds the total area covered by national parks by 22% (Lindsey et al. 2007). For wildlife conservation to be successful outside of national parks, these areas must be self-sufficient and able to generate sufficient revenue to cover the considerable costs of protecting the habitat and wildlife therein (Lindsey et al. 2006). Indeed, conservation would benefit from an incentive to utilise land for wildlife rather than the alternatives of livestock grazing, agriculture, and deforestation.

The international trade of lions, including trophies, is controlled by a strict CITES licensing system on the basis that this trade does not endanger the ultimate survival of the population (https://www.cites.org/eng/disc/how.php [accessed 2015-01-19]). The positive aspects of sport-hunting as a conservation tool include a focus on males and a low percentage off-take; neither of which generally jeopardise populations, and also suggest that hunting could play a role in population recovery (Leader-Williams et al. 2005).

The recommendation of setting uniform harvest limits, e.g. 1 lion 2,000 km^{-2} (Lindsey et al. 2012; Packer et al. 2010), may be overly simplistic, affect the economics of wildlife based landscape use, and disincentivise investment in conservation (Lindsey et al. 2007). A more practical approach to sustainably setting realistic lion sport-hunting quotas could involve using a positive/negative feedback method that calculates a fluid quota per area based on the previous season's performance. Such an adaptive quota management system has already been implemented in Zimbabwe.

Zimbabwe's Adaptive Lion Quota Management System

An adaptive quota management system for lion hunting based on the ages of lions hunted was agreed on in July 2013 in Harare, Zimbabwe, during a meeting hosted by the Zimbabwe Parks and Wildlife Management Authority (ZPWMA) and an independent non-governmental conservation organisation. The points system is summarised in Table 1.

Table 1: *Points allocated to hunting blocks arising from the harvest of lions of different ages*

	≥ 6 years	No trophy	5 years old	4 years old	< 4 years	Failure to submit return, or incomplete return
For quotas of ≥3	4	3	3	2	-3	0
For quotas of 2	4	3	3	2	0	0
For quotas of 1	6	3	3	2	0	0
Resultant quota	*These points are added up and divided by 3 to yield the quota for next year*					

During 2013, operators were requested to submit hunt returns and photos as a trial run to get the system up and running. In 2014 operators were requested to do the same but were informed that the age of the lions hunted in 2014 would determine their lion quotas in 2015. The 2015 lion hunt results would thus also determine the 2016 quota.

Results of the Adaptive Lion Quota Management System

In 2015 there was a marked increase in the age of lions hunted in Zimbabwe as a whole. Notably, only one lion of <4 years of age was hunted and the large majority of lions were 5 years or older (Figure 4). In 2013, only 28% of the lions hunted were 5 years or older, in 2014 that figure had risen to 49% and in 2015 to 77.3% (Figure 5). The proportion of lions hunted that were less that 5 years of age dropped overall between 2013 and 2015 (Figure 6). For this achievement, credit is due to the hunting community for showing greater selectivity of harvest. A word of caution however, is that the majority of lions hunted were on the cusp of 5 - 6 years of age and were not older than six years. Restricting hunting to individuals that are at least six (and preferably older) is desirable from a biological perspective due to the reduced risk of the loss of pride males and infanticide of cubs associated with the harvest of such individuals (Whitman et al. 2004).

In 2015 the Zimbabwe national lion hunting quota was set at 85 lions. Of this 85, only 39 were hunted in 2015, and based on the resultant score from aging the trophies, and the fact that operators chose not to hunt lions of inadequate age (see Figures 4, 5 & 6), the recommended quota for 2016 was set at 75 [Harare 2015-11-11]. (The Rural District Council areas in which lions occur are currently exempted from the age restrictions, as was agreed upon at the 2013 lion management meeting in Harare, as a means of ensuring that impoverished communities obtain the opportunity to benefit from the presence of lions, recognising the potential negative impacts the species has on the livelihoods of livestock farmers).

Using these figures and estimating the average value of a lion safari at approximately US$ 80,000 then a 50% offtake (35 lions) would generate US$ 2,800,000 annually. If management costs are approximately \$150 km^{-2} (V. Booth, pers. comm.), then the lion safaris alone can support 18,600 km^{-2} of wildlife habitat in Zimbabwe.

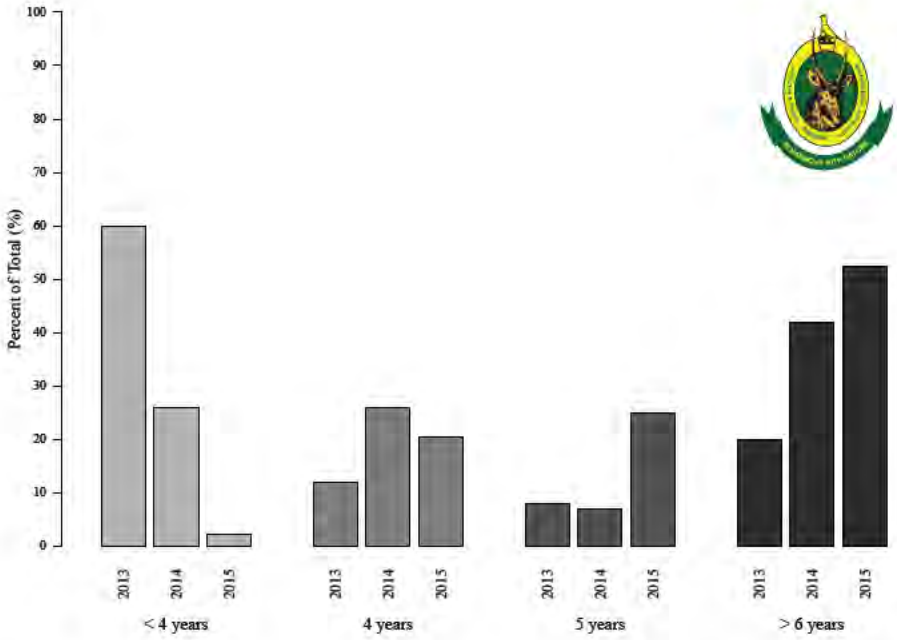

Figure 4: The percentage of lions hunted in each age class in 2013, 2014 and 2015 in Zimbabwe.

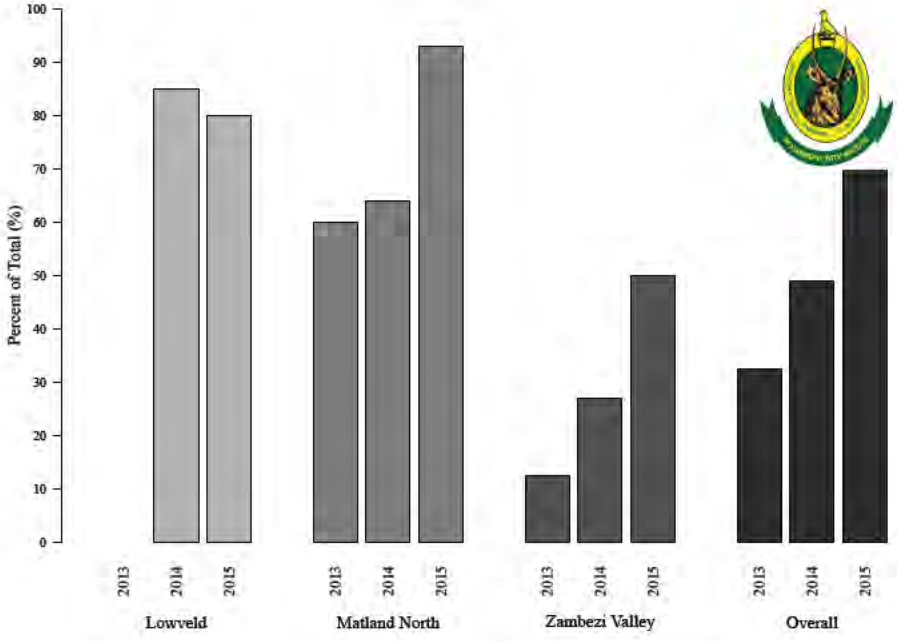

Figure 5: The proportion of lions hunted that were 5 years or older in the three main lion-hunting areas of Zimbabwe.

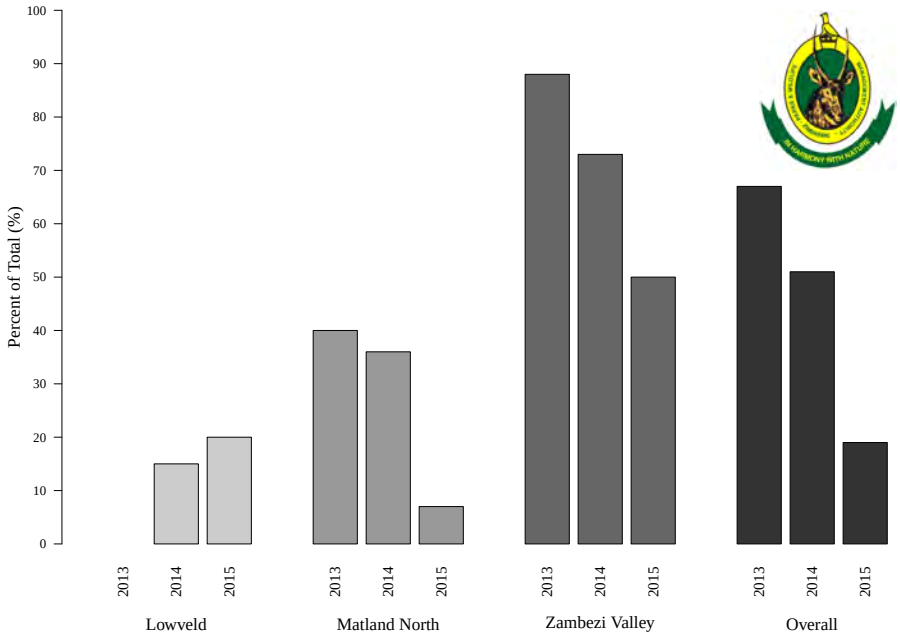

Figure 6: The proportion of lions hunted that were less than 5 years of age in the three main lion-hunting areas of Zimbabwe.

Table 2: *Human and Lion Conflict (2009 - 2011) in Zimbabwe, including human mortality caused by lion (CAMPFIRE Association, 2012)*

District	Total incidents	Livestock killed	*People Injured*	*People Killed*
Hurungwe	5	1	*2*	*2*
Chiredzi	25	136	*0*	*0*
Mbire	5	7	*0*	*5*
Binga	9	39	*0*	*0*
Total	**44**	**183**	***2***	***7***

Human-Lion Conflict

The lion is a flagship species and powerful symbol of Africa; yet living with lions poses hardships for many communities (e.g. Table 2). In some areas, the lion is a major predator on domestic livestock, inevitably leading to conflicts with local herders. Both sides suffer in this situation.

Outside of protected areas, the lion's prey base is much reduced, which results in relatively greater chance of encountering livestock. Co-existence of lions with people may be enhanced by giving value to lions through tourism and hunting promoted in communal lands under the Communal Area Management Programme for Indigenous Resources (CAMPFIRE). This hunting contributes to the conservation of lions via the financial revenue generated, which is ploughed back into conservation of the resource and empowers local communities to invest in their own rural development programs.

The Bubye Valley Conservancy

History of the Bubye Valley Conservancy

Towards the end of the nineteenth century, the Liebig's Extract of Meat Company (LEMCO) founded an extensive cattle ranch in the Zimbabwean lowveld, to the detriment of the indigenous wildlife that was initially eliminated because of competition for grazing with the livestock, as well as a risk of disease transmission from buffalo and wildebeest *Connochaetes taurinus*. As their natural prey base became depleted, the predators were subsequently persecuted when they began to prey on the livestock. Some wildlife persisted in small pockets of remote habitat, however lion, elephant *Loxodonta africana*, buffalo and rhinoceros *Diceros bicornis* [black] & *Ceratotherium simum* [white] were all completely eradicated. A monoculture of cattle dominated the landscape and impacted on the environment for the better part of a century.

Then, in 1992, Zimbabwe suffered one of the worst droughts on record, a relatively short time after the devastating one of 1983 that LEMCO was still trying to recover from. The frequency and severity of the droughts effectively reduced confidence in the economic viability of cattle ranching in the area, and the Bubye Valley Conservancy was subsequently founded in 1994 with the realisation that endemic wildlife, which are better adapted than livestock to cope with the local climate, could be successfully commercialised (Child 1988; Bond 1993).

The conversion from cattle ranching back to a wildlife area was neither straightforward nor cheap, requiring a significant initial investment and annual running costs. In just 20 years of operation the Bubye Valley Conservancy now protects the world's third largest black rhinoceros population, one of Zimbabwe's largest lion populations, a large and increasing elephant population, and abundant game.

Sport-hunting is an essential step in converting areas that were previously dedicated to livestock farming into non-consumptive tourism areas (Child 1993), and was fundamental to the formation of Bubye Valley Conservancy and allowing the wildlife populations to recover. The Samanyanga area of the Bubye Valley Conservancy, probably the most scenic section, was originally set aside for non-consumptive photographic tourism, but made an annual loss for several years, before, largely due to Zimbabwe's land reform program and resultant instability in the country, it was reverted back to sport-hunting as the only practical and economically viable option (K. Leathem, pers. comm.). Sustainable sport-hunting provides the sole economic incentive to continue operating the Bubye Valley Conservancy as a wildlife conservation area.

Bubye Valley Conservancy Community Support

The Bubye Valley Conservancy donates over 45 tonnes of meat from sport-hunting to the local communities each year. This meat donation is worth over US$ 100,000 per year, and the communities are free to decide how they use it. In addition to this, the Conservancy also supports several schools, clinics, and community projects in the three surrounding districts of Mwenezi, Maranda and Jopempe. The local community thus

sees a direct benefit from the wildlife on the Bubye Valley Conservancy, but is also empowered by job opportunities created both with these special projects, as well as on the Conservancy. A summary of the Bubye Valley Conservancy community support effort between 2011 and 2015 is provided in Table 4.

Bubye Valley Conservancy Lion Monitoring and Management

After originally being eradicated by cattle ranchers in the area, 13 lions were reintroduced to the Bubye Valley Conservancy in 1999, and four young males broke into the Conservancy that same year. From the original 17 animals present in 1999, the Bubye Valley Conservancy lion population was estimated at approximately 280 individuals in 2009 when robust population surveys were initiated by a research team from the University of Oxford Wildlife Conservation Research Unit (WildCRU), and this population has continued to grow. Today it is estimated that there are over 500 lions on the Bubye Valley Conservancy (du Preez et al. 2015). The exponentially increasing Bubye Valley Conservancy lion population currently exists at one of the highest densities in Africa (∼0.187 lions km^{-2}: du Preez et al. 2015; Figure 7), greater than that of the Serengeti, Tanzania (0.100 lions km^{-2}: Pusey and Packer 1987; Spong 2002), Selous, Tanzania (0.080 - 0.130 lions km^{-2}: Creel and Creel 1996, 1997), Kruger National Park, South Africa (0.096 - 0.112 lions km^{-2}: Mills 1995), and Hwange National Park, Zimbabwe (0.027 lions km^{-2}: Loveridge et al. 2007). This equates to one of the largest contiguous lion populations in Zimbabwe.

Bubye Valley Conservancy Lion Hunting

The Bubye Valley Conservancy offsets the cost of lion predation on its wildlife via sport-hunting of the species, and which began in 2002. In 2014, the lion hunting quota allocated to the Bubye Valley Conservancy by ZPWMA was 10 individuals. Based on the fact that the entire quota was harvested and that maximum points were scored for each individual trophy (more than six years in age), the allocated quota was raised to 13 lions for 2015. Only 12 out of 13 lions were hunted in 2015 due to a late cancellation; nevertheless eight lions over six years old and four lions of five years old were harvested and the resultant points justifying a quota of 15 lions for 2016.

Table 3: *The Bubye Valley Conservancy annual lion hunting quota and offtake from 2002 to 2015.*

	2002	2003	2004	2005	2006	2007	2008	2009	2010	2011	2012	2013	2014	2015
Approved quota	1	2	3	2	2	2	3	3	5	8	12	10	10	13
Quota taken	1	2	3	2	2	2	2	3	5	8	12	10	10	12
Percentage success	100	100	100	100	100	100	67	100	100	100	100	100	100	92

Note that while the lion hunting quota for Zimbabwe has been voluntarily reduced by the national steering committee, the Bubye Valley Conservancy lion hunting quota has been successively raised twice based on both hunt success and age of lions hunted and the resultant points scored under the national adaptive quota management system (Table 3).

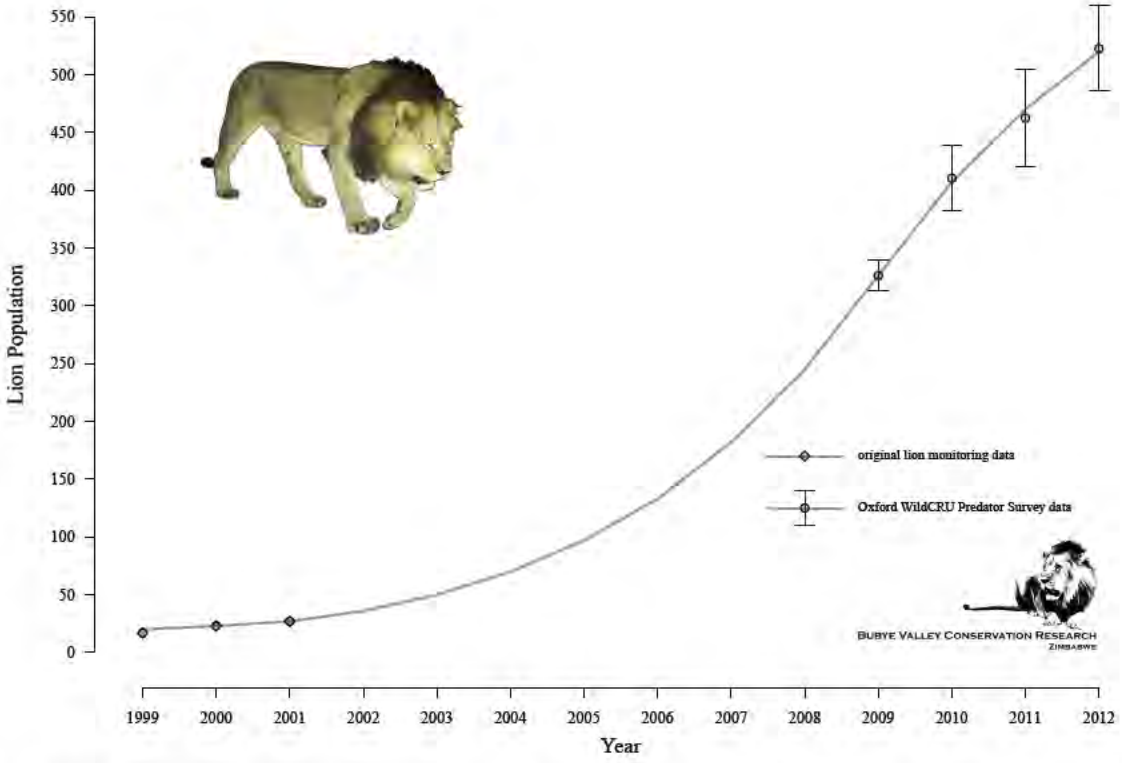

Figure 7: The Bubye Valley Conservancy lion population has grown exponentially since the reintroduction of lions in 1999. Diamonds represent the known lion abundance from monitoring of the original individuals introduced; Points indicate lion abundance calculated from spoor transect analyses; error bars represent the standard error of the mean.

Table 4: *Summary of the Bubye Valley Conservancy support to the surrounding local communities (2011 - 2015)*

Boreholes:	- 1 x Jompembi Village 2 - 1 x Penemene - 1 x Jompembi Village 4 - 1 x Nyimani village (Mwenezi) - 1 x Driehoek School - 1 x Mgaladhivha School - 2 x Mtetengwe to supply water to the clinic site - 2 new bush pumps (complete) purchased and installed at Village 2 & Village 3 and troughs built at both sites *Drinking trough for cattle built at Village 2 borehole* *All boreholes equiped with new bushpumps, piping and cylinders* *Boreholes at Village 3, Mtetengwe, Mdzwiti, Vumani and Penemene and Makado Police post repaired and maintained* *All new piping and pumps etc. are supplied by BVC*
Buildings:	- Mtetengwe Clinic's main building built - 3 x F13 staff houses built *Clinic and House fenced - everything funded and built by BVC* *The clinic is a standard large Government clinic - male & female wards + maternity ward and outpatients* *Storerooms, offices etc. also built* *All houses and buildings are electrified, painted and supplied with running water* - Mtetengwe School school office block and staff room built and painted *All classroom windows repaired and the schools second borehole repaired.* - Secure engine house was built at the second borehole site - Borehole equipped with BH15S mono pump unit driven by a rebuilt Lister LT 1 engine - 5000 litre header tank and stand errected - new 5000 litre header tank purchased and fitted - pipeline laid to connect the borehole to the clinic - another pipeline connected to the same borehole to supply the Mtetengwe school with fresh water - New coldroom and refrigeration unit purchased and fitted at the Lutumba butchery *Part of aid program to get the Beit Bridge RDC self funding projects up and running* - New coldroom and refrigeration unit was purchased and fitted at the Rutenga butchery *Part of aid program to get the Mwenezi RDC self funding projects up and running*
Meat Donations:	- BVC donates meat on a regularly basis to the Mwenezi Orphange - Numerous donations of meat were made to support school sports days & speech nights/prize giving events *Both Beit Bridge & Mwenezi districts* - 1600 kgs of meat has been donated each month since July 2011 to a Maranda trust *Administered by Chiefs andlocal headmen* *Excess meat sold and funds used for community projects* *Classroom roof replaced at Vhongwe school* *4 new classroom blocks constructed at other schools using funds from these monthly allocations* - 1000 kgs of meat per month is been donated to Beit Bridge communities since April 2014 - 1000 kgs of meat per month is been donated to Mwenezi communities since August 2013
Miscellaneous:	- Sports uniforms for the Penemene school team purchased ($2600) *Sports uniforms required for inter-schools sports* - Transport the soccor teams representing Mgaladivha, Jompembi and Tongwe *To Lutumba for the inter-school competitions* - 2 sets of soccer goal posts & 2 sets of Netball poles were made for Mgaladivha School *New soccer field graded by BVC* - 2m security fencing supplied to Penemene School - Second hand door and window frames donated to Mapiri school (ex Mazunga School) - 1 new 3 1/2 " rod pump cylinder was purchased and fitted to the Vumhani borehole *All repairs to b/holes in the Vumhani area are done by BVC* - 26 bags of cement were donated to Mgaladivha School - Fencing donated to the Mgaladivha School - Supplied 10 x 5/8" mono shafts for the Botalele Clinic (Maranda) borehole - Water supply to Mlelezi Clinic - 400 m pipeline laid to supply the Nyimani Villarge's cattle with water *3.5 m drinking trough build for this same project* - 60 bags cement donated to the Welkom for repairs to a dam wall - 6 loads of riversand and 20 cement donated to Vumani Preschool - Various school renovations in both the Beit Bridge and Maranda areas
Current Projects:	- Construction of a School admin block at Mgaladhivha School - Supply of 24 loads of riversand to Mdzwiti School (value $1200) - All roofing materials supplied to Mdzwiti School - Supply roofing materials, cement, all window and door frames for Vumani Preschool

The Savé Valley Conservancy

History of the Savé Valley Conservancy

The Savé Valley was a wildlife-rich wilderness until the early 1900's, when the first cattle ranching initiatives started in the area. The establishment of Devuli Ranch and Angus Ranch in 1920 paved the way for seven decades of commercial cattle ranching in the area we know today as the Savé Valley Conservancy. Roads were cut, fences erected and an everlasting 'battle' ensued against the wildlife, especially against all predators.

The large predators, especially lions, were virtually eradicated (Pole 1999). However, by the late 1980's, declining range productivity, depressions and droughts forced the landowners to consider alternative options. Around that time, empirical evidence of the competitive advantage of wildlife over livestock began to emerge (Child 1988; Bond 1993), especially in arid areas (Jansen et al 1992; Cumming 1993), and wildlife was finally given serious consideration as a viable land use option.

In 1989, a proposal was drawn up (du Toit 1989) to turn what was then the Sabi Valley Intensive Conservation Area into a wildlife conservancy. The plan was to create a single large wildlife area, especially for the re-establishment of endangered species and overexploited species, with cattle remaining the primary income generator. The Savé Valley Conservancy was constitutionally inaugurated in June 1991, and following the severe 1991/1992 drought, wildlife ranching became the primary land-use. At the time this was the largest private wildlife conservancy in the world (3,410 km^2).

The conservancy members then restocked the wildlife, removed all internal fencing, erected a common perimeter fence and developed effective security systems. A double, electrified, veterinary-approved fence was completed in 1995, and the following decade saw a massive investment in wildlife re-stocking and security systems.

Sport-hunting was essential for the successful transition of the conservancy from cattle to wildlife. During the early years, wildlife densities were low, resulting in poor potential for ecotourism, and hunting generated the income needed to erect the fence, re-stock game, and improve security, especially because of the significant numbers of black rhinoceros now found there. Gradually, some of the ranchers shifted more into ecotourism. One property, Senuko Ranch, completed a 16 bed up-market lodge with a view of marketing non-consumptive safaris, offering game drives and bush walks and specializing in rhino walks and African wild dog *Lycaon pictus* den visits. Lodge occupancy rose from 0% in 1996 to 62% by the end of 1999.

However, the Zimbabwean land reform program, which was initiated in February 2000, soon made a strong negative impression in the international community, and resulted in travel bans and warning from most of Zimbabwe's source markets. This, together with the political instability meant that the wildlife industry and ecotourism industry collapsed over-night: sport-hunting became the only economically viable land use option, and has remained the only tangible source of income to the landowners of the Savé Valley Conservancy. In the case of the Senuko Lodge, for example, the land reform program resulted in a 98% cancellation of

the confirmed bookings. After four years of seeking alternative markets, the lodge could achieve no higher than 17% occupancy, and in 2005 moved back into a hunting-based operation.

A more direct impact of the land reform program for the Savé Valley Conservancy was the loss of 33% of the area of the conservancy to invading subsistence farmers (Lindsey et al 2008). The loss of land was catastrophic and the related pressure from wire snare poaching was extreme. In the following eight years (2001 to 2009), 10,520 illegal hunting incidences were recorded, 84,396 wire snares were removed and at least 6,454 wild animals killed (Lindsey et al. 2011).

Savé Valley Conservancy Community Support and Anti-Poaching

In 2012, conservancy members provided over US$ 100,000 worth of support to adjacent villages or farmers in the resettled areas. Assistance included drilling boreholes, maintaining boreholes, dredging of dams, assisting with building projects in clinics and schools, assisting with repairs, maintenance and materials at schools, education initiatives, school field trips, provision of computer equipment in schools, craft programs and regular donations of meat.

Moreover, the conservancy recently entered into a mutually dependent agreement with the Chiefs representing the communities surrounding the Savé Valley Conservancy. The agreement links the communities to the Natural Resource Utilisation that occurs through the business operation of the conservancy and opens up opportunities for the local indigenous populations to share in any wealth creation. This agreement strengthens relations between the conservancy and the surrounding local communities and creates an environment that helps to protect, conserve and sustain the natural assets of the area. The hunting tourism of the conservancy is currently the only form of income by which the surrounding communities can benefit. Revenues from trophy lion hunting constitute a significant portion of inflow and thus an important part of the community benefits. Any reduction would seriously jeopardise the growth of this infant positive relationship and community empowerment initiative.

The Savé Valley Conservancy is thus pioneering private-community partnerships in Zimbabwe, and trade restrictions on lion trophies will indirectly adversely affect these already seriously impoverished communities through a reduction in available income to share with communities. This is very likely to have a knock on impact on the lions themselves with a significantly reduced tolerance and an increase in retaliatory poisoning of lions for livestock predation. Without a demonstration of income from lions, the political pressure from the surrounding communities to remove them from the conservancy altogether will be a challenge to resist.

Savé Valley Conservancy Lion Monitoring and Management

After the Conservancy was formed, and persecution stopped, lions, mainly males, recolonized the area and their numbers started to increase in the late 1990's / early 2000's. Few lionesses were observed until 2003, when small family groups and male-female pairs were seen, and by 2004 - 2005 there were some reports of cubs. During this period 13

lions were also reintroduced into the Savé Valley Conservancy. After an initial lag phase the lion population on the Savé Valley Conservancy has increased dramatically and at present is growing exponentially (Figure 8; Groom and Watermeyer 2015).

Monitoring of the lion population began in 1999 (Pole 1999) with track index or call-up surveys being conducted sporadically until 2006. From 2007 to present, annual conservancy-wide track index surveys have been conducted using a standardized methodology (Groom and Watermeyer 2015). The resulting population estimates were verified in 2011 by a baited lion call-up survey and a collation of managers' estimates, all of which provided similar results.

Prey availability models (Hayward et al. 2007) suggest that the carrying capacity for the lion population in the Savé Valley Conservancy is approximately 271 lions. The population estimate for 2015 was 284 lions, suggesting lions have reached their ecological carrying capacity, even whilst being responsibly hunted.

A professional lion management plan was commissioned by the conservancy in 2011 (Funston 2011), to provide the Savé Valley Conservancy members with a science-based plan to help them ethically and sustainably manage their lion population. This plan specifically advocates the use of hunting as a conservation management tool. It also demonstrates willingness by the conservancy to guide their lion management based on science and advice from professionals.

Savé Valley Conservancy Lion Hunting

Lions have been hunted in the Savé Valley Conservancy since 2002, although that was largely for removal of problem animals. Hunting began properly in 2005 with quotas increasing annually to a maximum of seven per year from 2009 onwards (Table 5), with the quota being raised to ten for 2016 based on trophy ages.

Despite offtakes of lions through sport-hunting, the lion population has continued to increase in the Conservancy. The revenue generated from hunting lions has enabled landowners to invest in proper land management, anti-poaching, water provision and fence maintenance, all of which benefit the lion population (especially as lions seem to be vulnerable to being caught in wire snares; Becker et al 2013; R. Groom, pers. obs.).

Table 5: *The Savé Valley Conservancy annual lion hunting quota and offtake from 2002 to 2015.*

	2002	2003	2004	2005	2006	2007	2008	2009	2010	2011	2012	2013	2014	2015
Approved quota	5	5	1	3	3	4	6	7	7	7	4	2	3	5
Quota taken	1	0	1	3	3	3	3	6	5	3	4	1	3	5
Percentage success	20	0	100	100	100	75	50	86	71	43	100	50	100	100

Sport-hunting of lions brings considerable revenue to the Conservancy, revenue that is vital for the continued functioning of the area for wildlife conservation. Without the costs of lions being offset by the income from sport-hunting, landowners cannot reasonably be expected to tolerate such high lion densities, and their numbers would have to be reduced significantly.

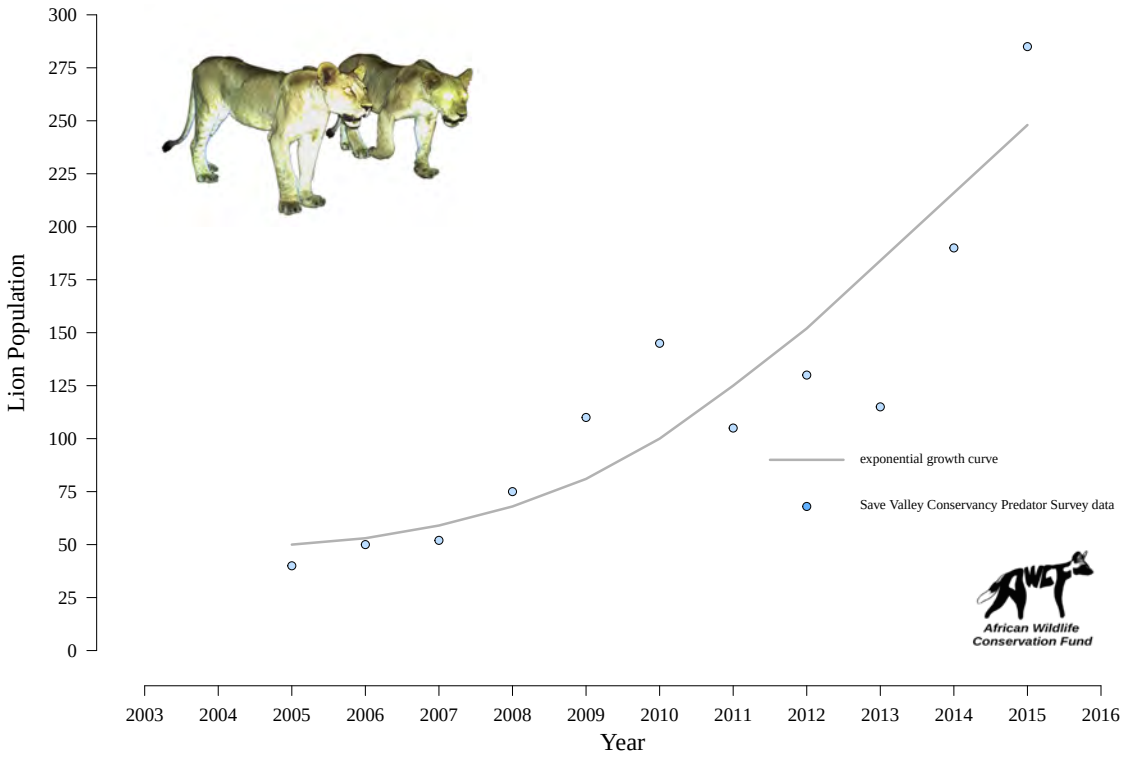

Figure 8: The Savé Valley Conservancy lion population, like that of the Bubye Valley Conservancy, has grown exponentially. Points indicate estimated lion abundance calculated from field surveys; the line represents the exponential growth curve.

The Pros and Cons of Conserving Lions

The saturation of lions in wildlife areas on both state and private land is positive for their future conservation security; but it is also critical to that of incidentally conserved endangered species, such as both species of rhinoceros on private wildlife conservancies in Zimbabwe (Lindsey et al. 2009; Suzuki 2001), which benefit from the same resources and protection that are incentivised and provided by the revenue generated from sport-hunting. The Bubye Valley Conservancy now boasts the world's third largest black rhinoceros population (N. Anderson [Lowveld Rhino Trust], pers. comm.), which is classified as Key 1 by the African Rhino Specialist Group and means that this population is considered key to the overall survival of the species. The Savé Valley Conservancy has the second largest black rhinoceros population in Zimbabwe after Bubye. These are not coincidences. These rhinoceros (and other endangered species, such as wild dog) strongholds are the result of the incidental conservation benefits derived entirely from sport-hunting activities - there are no photographic tourists visiting either the Bubye Valley or Savé Valley Conservancies, and the rhinoceros are not hunted. Having rhinoceros on the land therefore generates no revenue - and in fact there is a significant cost associated with protecting these animals; US$ 590,000 (not including incentive and reward bonuses donated for these purposes) was spent on anti-poaching by the Bubye Valley Conservancy during 2015 (K. Leathem, pers. comm.), and US$ 546,000 is spent annually on anti-poaching by the Savé Valley Conservancy (Lindsey et al. 2012). This expense is covered mainly by the revenue generated by sport-hunting with additional donations from the clients; and most importantly, the habitat for the rhinoceros is preserved by maintaining the land as a conservation area, as opposed to converting it into agricultural or grazing land for example.

However, the high densities of lion populations achieved within commercial wildlife areas have the potential for intense intraguild persecution. Lions are aggressively competitive, and research on the relationship between lions and leopards has shown that high densities of lions can negatively affect leopard population density, demographic structure, cub survival, and spatial ecology down to even the step-wise decisions that leopards make regarding habitat use and behaviour based on both the actual and potential risk of encountering lions (du Preez 2014; du Preez 2015). Leopards are a generalist species that are able to cope with persecution by adapting their behaviour and ecological niche, and even they suffer under a burgeoning lion population; ecological specialists and endangered species, such as cheetah *Acinonyx jubatus* and wild dog, do not fare nearly as well under such intense competitive pressure. In fact, competition with lions has been directly linked to reductions in cheetah (e.g. Durant 1998, 2000; Laurenson 1995) and wild dog (e.g. Creel 2001; Creel and Creel 1996; Vucetich and Creel 1999) densities, both of which face local extinction where lion abundance, and the respective level of persecution, is high. Excessive lion densities may also result in population declines of ungulate prey (e.g. Wegge et al. 2009). It is vital to holistic conservation that wildlife managers can understand and deal with the level of impact that lions exert on other species; particularly those that

are elusive difficult to observe, and which face decline if not carefully monitored. To this end, a conservation research initiative in partnership with WildCRU was established on the Bubye Valley Conservancy in 2009, and research conducted on the Savé Valley Conservancy since 2007.

Based on the number of kills made (du Preez et al. in prep.) and the current value of the meat (K. Leathem, pers. comm.), the Bubye Valley Conservancy lion population consumes hundreds of thousands of dollars worth of prey each year. These lions are mainly tolerated because of their ability to generate the revenue that helps to offset this expense - although it is estimated that economically it is still not worth keeping the lions whose cost outweighs their value (Funston et al. 2013).

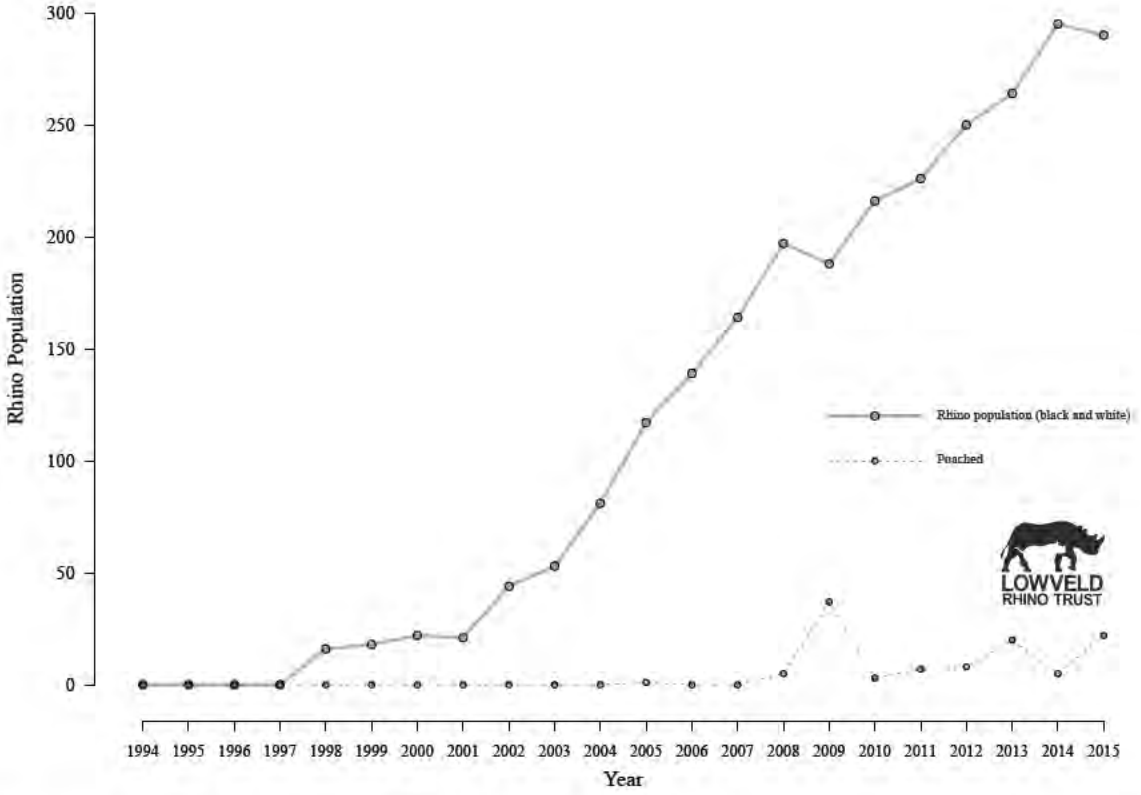

Figure 9: The Bubye Valley Conservancy black rhino population is rated as Key 1 by the African Rhino Specialist Group which means that the population is considered key to the overall survival of the species.

Where the Money Goes: The Finances of Lion Sport-Hunting and Reinvestment in their Conservation

Break-down of the finances involved in a typical lion hunt on the Bubye Valley Conservancy:

Lion Trophy fee: US$ 42,000
Lion Hunt Daily rate: US$ 2,950 day^{-1}
(Minimum lion hunt duration: 18 days [*total daily rate of US$ 53,100 lion hunt^{-1}*])

Additional costs include:
ZPWMA scout
Observers
Bait used
Other trophy species taken during the lion hunt, etc.
[*These additional costs average approximately US$ 6,500 lion hunt^{-1}*]

Bubye Valley Conservancy - Lion Sport-Hunting Revenue Generated (2015):

((18 days × 2,950 day^{-1}) + 42,000 trophy fee + 6,500 additional costs) × 12 lions
= **US$ 1,219,200**

Lion sport-hunting therefore represents approximately 33.9% of the Bubye Valley Conservancy's total annual revenue generation (which includes post-hunt meat and hide sales).

All of the revenue generated from lion sport-hunting on the Bubye Valley Conservancy has gone back into the running costs of the Conservancy, which is all part of conservation, and which includes: anti-poaching and fence monitoring and maintenance (approximately US$ 506,000 year^{-1}), research (approximately US$ 34,700 year^{-1} not including client and sponsor donations), and community support assistance (approximately US$ 210,000 year^{-1}).

[*No profit after costs has been declared, nor dividends taken by shareholders, since the Bubye Valley Conservancy was formed in 1994. All revenue generated to date has been spent on running costs, improvements and restocking.*]

Discussion

Here we have shown that since their reintroduction after historical eradication, both the Bubye Valley and Savé Valley Conservancies' lion populations have increased exponentially - not despite sport-hunting, but because of sport-hunting and the incentive it provides for protection.

The success of the Bubye Valley and Savé Valley Conservancies, in terms of both of their hunted lion and non-hunted rhinoceros populations, may also provide the motivation for other areas in the country to sustainably manage their wildlife resource. A case in point is the Nuanetsi Ranch, a wildlife area that is also a legacy of failed cattle ranching, located almost directly between the Bubye Valley and Savé Valley Conservancies in Zimbabwe (Figure 3). At present there is a single lion on the Nuanetsi Ranch but management is not able to justify introducing more due to the current uncertainty over the future of lion hunting (B. Lees-May [Nuanetsi Ranch Conservator], pers. comm.). The Nuanetsi Ranch is a wildlife area of 1,489 km^2, and could conceivably sustainably hold between 201 and 278 lions (based on the most recently estimated lion densities of the Savé Valley [0.135 lions km^{-2}; Groom and Watermeyer 2015]; and Bubye Valley [0.187 lions km^{-2}; du Preez et al. 2015] Conservancies respectively). However, the Nuanetsi Ranch has invested in building up an abundant wildlife population, which is sport-hunted, and the management will not risk losing a significant amount of valuable game, that could otherwise be sold as trophies or meat, to a species from which it can not recuperate lost revenue, and instead that requires further investment in control measures (B. Lees-May [Nuanetsi Ranch Conservator], pers. comm.).

Between 2005 and 2015 the United States market has represented 70.4% of the total Zimbabwean lion sport-hunting industry (http://trade.cites.org/en/cites_trade/ [accessed 2015-01-19]), though in reality it constituted over 90% for both the Bubye Valley and Savé Valley Conservancies. If this market was effectively lost due an inability of prospective clients to import their trophies, based on the economics involved it would become unviable to continue managing the Bubye Valley Conservancy as a wildlife area in its current form, and lions would either have to be re-exterminated, or at least severely reduced via culling; or else what is the largest privately owned wildlife area in the world would be converted back into a cattle ranching area (K. Leathem, pers. comm.). This is the reality of any business, in that it needs to cover costs and pay staff and cannot run at a loss for luxury of conservation. Child (1993) states "*A refusal to treat wildlife in the same way as other resources and maintenance of centralised protectionist management prejudices its survival. Only by raising its commercial value will wildlife be able to compete for space on the scarce African landscape. Trade bans which detract from wildlife's commercial value prejudice its chances of survival in the long term*".

Although the USFWS understandably categorises lion conservation by country for simplicity, rather than individual properties, the Bubye Valley and Savé Valley Conservancies currently and deservedly hunt more than a third of the total Zimbabwean lion quota between them. Here we have shown that this sport-hunting does not negatively affect the lion population, which remains in positive growth despite off-take. In addition

to this, other areas, such as the Nuanetsi Ranch, could be incentivised to invest in lion conservation if the ability to sustainably utilise the lions as a resource was guaranteed.

The USFWS identified five primary factors that threaten lion survival in the wild, namely: habitat loss; loss of prey; retaliatory killing due to increased human-lion conflicts; inadequate regulatory mechanisms; and weak management of protected areas (http://www.fws.gov/endangered/what-we-do/lion.html [accessed 2015-01-19]). Each and every point on this list, which notably does not include sport-hunting, supports the fact that incentivising tolerance for lions through sustainable use would enhance the species' overall survival.

As responsible conservationists, we are not arguing against tight regulation of sport-hunting, especially with regard to sensitive species such as lions, and we support the need for transparency and accountability within the industry. However, this reform is a process being driven from within, as any indiscretion is an affront on all stakeholders. For example, long-term lion monitoring by WildCRU in Hwange National Park (HNP), Matabeleland North, Zimbabwe, documented a 'vacuum effect' and reduction in male lion density in the Park as a result of sport-hunting in the surrounding areas (Loveridge et al. 2007). A result of this research was the recommendation that ZPWMA implement a hunting moratorium in western Zimbabwe, which was accepted and enforced from 2005 to 2008 (Davidson 2009). Subsequent monitoring of the HNP lion population showed that the perturbation effects caused by sport-hunting were reversed during the moratorium, and sport-hunting was reinstated at a reduced, more sustainable quota (Davidson 2009). This example demonstrates both the relationship between independent researchers and ZP-WMA, and that the research assists ZP-WMA in robust decision making. This study has also shown that the lion population was able to recover quickly, and that a blanket-ban would have been as unnecessary as it would have been detrimental to overall lion conservation in the country.

In addition to the self-imposed hunting moratorium in the Matabeleland North district, Zimbabwe has voluntarily stopped sport-hunting of any lioness. The fixed-quota concept, in which hunting quotas had to be paid for upfront before the hunting season even began, and which was resultantly attributed to poor quality trophies and young animals being hunted, has also been abandoned. The adaptive quota management system for lion hunting based on the ages of lions hunted has been accepted and embraced by all stakeholders. This adaptive quota management system has not only led to a reduced national lion hunting quota, but has also resulted in a significant increase in the age of harvested lions to a level that is considered to have minimal ecological impact, being old individuals that are no longer contributing to the gene pool nor protecting cubs.

The IUCN Red List lion conservation status has remained unchanged for 20 years even in the face of Africa's ever-changing landscape. Despite fears that lion abundance is decreasing overall, in southern Africa it is in fact increasing (Bauer et al. 2015b).

Conclusion

Given the evidence presented, the arguments against sport-hunting would appear to be based more in emotion than logic and reality (e.g. Lindsey et al. 2015). Conservation, however, is not about individuals within populations, but the overall populations themselves. Sustainable sport-hunting of lions is just that: *sustainable* - and ironically, without it, the lions themselves become unsustainable. Conservation objectives need to be balanced with both social and economic factors if they are to be achieved.

The USFWS states "Well-managed conservation programs use trophy hunting revenues to sustain lion conservation, research and anti-poaching activitie" (http://www.fws.gov/endangered/what-we-do/lion.html [accessed 2015-01-19]). The Bubye Valley and Savé Valley Conservancies both fully meet each one of these conditions: clearly contributing to lion conservation in Zimbabwe; having long-term conservation research programs; and self-funded anti-poaching units.

The histories regarding the formation of both the Bubye Valley and Savé Valley Conservancies were both presented in this report, despite being remarkably similar; the point being that lion conservation in both areas, and many others, has the same fate either way. The Bubye Valley and Savé Valley Conservancies are both excellent examples of focussed and determined efforts to make wildlife based land use viable in an otherwise cattle dominated landscape. However, the fact remains that the cost of having lions, both ecologically and financially, is high. Simply increasing the abundance of one species at the expense of another cannot be considered a conservation success.

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Williams, P.H., Burgess, N.D., Rahbek, C., 2000. Flagship species, ecological complementary and conserving the diversity of mammals and birds in sub-Saharan Africa (vol 3, part 3, pg 258, 2000). Animal Conservation 3, 365-365.

ZPWMA, 2015. Conservation Status of the African Lion (Panthera leo) in Zimbabwe. Unpublished Report for the USFWS.

Subject: Fwd: Zimbabwe: Safari operators see 20% revenue decline
From: "Regina A. Lennox" <regina.lennox@conservationforce.org>
Date: 5/2/2016 4:20 PM
To: "Vannorman, Tim" <tim_vannorman@fws.gov>, bryan_arroyo@fws.gov, dan_ashe@fws.gov
CC: "John J. Jackson, III" <jjw-no2@att.net>

Good afternoon,
Please see the article below about continued losses to Zimbabwe's safari industry due to the elephant import suspension among other factors.
This is a 20% projected loss on top of the actual 30% loss they reported last year (we previously sent you that article as well, available at http://allafrica.com/stories/201512180502.html).

---------- Forwarded message ----------
From: **Regina A. Lennox** <regina.lennox@conservationforce.org>
Date: Mon, May 2, 2016 at 6:59 AM
Subject: Zimbabwe: Safari operators see 20% revenue decline
To: John Jackson <jjjiii@att.net>, "John J. Jackson, III" <jjw-no2@att.net>, Marco Pani <(b) (6) [redacted]>

Zimbabwe Independent

http://www.theindependent.co.zw/2016/04/29/safari-operators-see-20-revenue-decline/

Safari operators see 20% revenue decline

April 29, 2016 in Business

The Safari Operators Association of Zimbabwe (Soaz) has projected a further 20% slump in revenue this year owing to various internal and external challenges affecting the sector, businessdigest has learnt.

By Kudzai Kuwaza

Safari operators last year suffered a 30% reduction in revenue as the continued ban on the importation of sport hunted elephant trophies from Zimbabwe imposed in April 2014 by the United States government took its toll on the sector.

Soaz president Emmanuel Fundira told businessdigest last week that the tightening of regulations by the government since the killing of the famous lion, Cecil, last year,

among other challenges, is having adverse effects on their operations.

"The season has commenced in earnest albeit with many challenges which are both internally and externally driven," Fundira said. "Internally, the demise of Cecil the Lion has prompted the authorities to introduce a myriad of controls and measures not conducive to the running of efficient and profitable operations. For example, of late there has been a tightening of controls over the issuance of permits and supervision of hunts which have become both costly and cumbersome."

He added that externally there has been "massive" lobbying against sustainable wildlife use compounded by the continued ivory ban and the decision by the United States in January this year to uplift lions by introducing a cumbersome permit system "has not helped either"

Given the challenges, Fundira said although it was too early in the year to forecast revenue projections, a decline of not less than 20% was forecasted from last year's figures.

The Soaz president said the sector continues to develop new markets, adding responses from Central Europe and Russia "are somewhat a bit encouraging."

He said developing new markets was a long drawn exercise and is bound to take time.

Fundira expressed relief that the attempt by the European parliament members to stop the import of hunting trophies earlier this month had failed.

"The Safari Operators Association of Zimbabwe noted with relief that a move by a group of European Parliament members to pass a Written Declaration that would restrict the import of all hunting trophies to the European Union failed to achieve the requisite number of votes to be considered at the Parliament's next sitting," Fundira said.

"Reason and common sense prevailed over emotions and populist sentiment.

Sweeping changes to hunting practices in Africa can have a detrimental impact on conservation models and marginalised poverty-stricken communities that depend on hunting for their livelihoods.

--

Regina A. Lennox
Conservation Force
3240 S I-10 Service Road W, Suite 200
Metairie, Louisiana 70001 USA
504-837-1233 (office)
919-452-8652 (cell)

regina.lennox@conservationforce.org

Subject: Fwd: SEBUNGWE WORKSHOP DRAFT INVITATION
From: "John J. Jackson, III" <jjw-no2@att.net>
Date: 5/4/2015 9:18 AM
To: Tim Vannorman <Tim_Vannorman@fws.gov>, Bryan Arroyo - FWS <bryan_arroyo@fws.gov>, "Gnam, Rosemarie" <rosemarie_gnam@fws.gov>

FYI - We are getting close. See attached 50 person invitations list.

--
John J. Jackson, III
CONSERVATION FORCE
3240 S. I-10 Service Road W., Suite 200
Metairie, Louisiana 70001
Tel: (504) 837-1233
Fax: (504) 837-1145
jjw-no@att.net
www.conservationforce.org

-------- Forwarded Message --------
Subject: SEBUNGWE WORKSHOP DRAFT INVITATION
Date: Sat, 2 May 2015 13:17:38 +0200
From: Lynne Taylor <lynne@thetashingainitiative.org>
To: Marco Pani <(b) (6) [redacted] Geoffreys Matipano <gmatipano@zimparks.co.zw>, Tawanda Noel Gotosa <nyamazana@zol.co.zw>, richard maasdorp <(b) (6) [redacted]
CC: John J. Jackson, III <jjw-no2@att.net>

An updated version is attached: Please see the added instructions in yellow highlight on the invitation.

--
Lynne Taylor
Director
The Tashinga Initiative Trust
A Wildlife Protection Project
Zambezi Valley, Zimbabwe
http://www.thetashingainitiative.org
www.facebook.com/The Tashinga Initiative
+263 772348671

Attachments:

d r a f t PWMA INVITATION 2015 SEBUNGWE WORKSHOP v2nd May 2015.docx	597 KB

INVITATION

Zimbabwe Parks and Wildlife Management Authority cordially invites you to attend a Collaborative Workshop

SEBUNGWE ELEPHANT MANAGEMENT ACTION PLAN WORKSHOP

To be held at

MUSANGO SAFARI LODGE

19 – 22 May 2015.

To travel to Musango Safari Lodge by road or by lake, on 19th May, Workshop to be held 20th May, 21st May and ending late morning of 22nd May, 2015

RATIONALE:

This workshop will produce a sub-regional Action Plan for the Sebungwe Elephant population, and will be strongly linked to, and based on, the outcomes of the National Elephant Management Plan. The Sebungwe plan should be one that is applicable, practical, achievable and one that is produced at the workshop without further work after that time.

There is need for a greater coordinated and collaborative effort than ever before amongst the Sebungwe's stakeholders to deal with ongoing wildlife crimes and other challenges that are threatening biodiversity conservation. Specifically, private sector tourism and safari operators providing safari services in the Parks and Wildlife Estate see the threat as not only undermining the conservation status of the PWMA Estate but the very resources upon which their businesses depend.

As the Sebungwe's human densities increase, combined with the increased poaching of eelphant and deforestation levels, the need for better and improved communication between all stakeholders, collaboration and coordination of conservation effort have become increasingly apparent. This is essential if optimum efficiency and effectiveness in the management of Elephant populations is to be achieved.
The outcomes of the Sebungwe Workshop will be based on two documents:

(1) The final draft of the National Elephant Management Plan
(2) The data, and specifically that related to the Sebungwe Region, from the National Elephant Aerial Survey undertaken in 2014.

The Principle Sponsor of the meetingh requests that you come prepared to suggest and discuss potential action items within your sector of interest and expertise (safari hunting, photographic tourism, community interest, NGO interests, government) a more effective force for survival of elephant in the Sebungwe Region over the next 5 years.

ACCOMMODATION AT MUSANGO SAFARI CAMP

The Workshop, funded by Conservation Force, will take care of Participants as invited by the Director General, Parks and Wildlife Management Authority and Participants from PWMA, Participants from Campfire Association, Participants from Law Enforcement Agencies, Judiciary, Participant representatives from Communities living in the Sebungwe, and Participants from Chinhoyi University of Technology. This provision will cover accommodation, 3 x meals per day, 2 x teas per day. A small per diem will be provided to cover each Participant's drinks.

All Participants invited by the Director General Parks and Wildlife Management Authority who are from NGO's, donor organisations, charitable trusts, tourism photographic sector, safari hunting sector, technical experts will be expected to pay a registration fee on arrival which will cover all accommodation and boat transfers from Kariba to Musango return @ USD165.00 each.

TRANSPORTATION:

- **Would participants please make their way to Musango Safari Camp, on 19th May, 2015 to arrive no later than 1600hrs please. This can be achieved by road via Siakobvu, or by boat from Marineland Harbour, Kariba. The boat transfer will leave no later than 1430hrs on 19th May 2015.**

- **For all participants coming in by road:**

  From Mola Village, we will be putting up signposts which you can follow and which road will end at a parking area on the BUMI HILLS SIDE of Musango Safari Camp. From this point, you will be picked up by boat to reach Musango Safari Camp on the other side of the bay, just a short distance away.

- **Thursday 22nd May 2015: After breakfast, a Working session will be held until 1030hrs. Departure from 1030hrs onwards for Kariba by boat and other destinations through own transportation arrangements. Transportation across the Bay back to the Car Park will be provided.**

- **Please contact lynne@thetashingainitiative.org or 0772348671 with any further enquiries.**

WORKSHOP:

The workshop will be held at Musango Safari Camp, with workshop notebook and pen, name-tag, provided on site. The Workshop will be facilitated by Dr David Cumming.

NB: PARTICIPATION!
Please respond by email to this invitation as soon as possible, clearly stating SEBUNGWE WORKSHOP ATTENDANCE in your email subject line, thank you.

Subject: Fwd: Re: SEBUNGWE PLANNING MEETING
From: "John J. Jackson, III" <jjw-no2@att.net>
Date: 5/4/2015 9:19 AM
To: Tim Vannorman <Tim_Vannorman@fws.gov>, Bryan Arroyo - FWS <bryan_arroyo@fws.gov>, Dan Ashe <dan_ashe@fws.gov>, Rosemarie Gnam <Rosemarie_Gnam@fws.gov>

FYI

-------- Forwarded Message --------
Subject: Re: SEBUNGWE PLANNING MEETING
Date: Sat, 2 May 2015 14:25:51 +0200
From: Marco Pani (b) (6)
To: Lynne Taylor <lynne@thetashingainitiative.org>, Geoffreys Matipano <gmatipano@zimparks.co.zw>, Tawanda Noel Gotosa <nyamazana@zol.co.zw>, (b) (6) (b) (6)
CC: John J. Jackson III <jjw-no2@att.net>

Hi,

Please take note of the attached email, and please provide comments/actions as needed.

Best Regards

Marco

> Inizio messaggio inoltrato:
>
> **Da:** Marco Pani <(b) (6)
> **Oggetto: I: Sebungwe workshop preparation**
> **Data:** 29 aprile 2015 17:56:39 CEST
> **A:** Geoffreys Matipano <gmatipano@zimparks.co.zw>, Tawanda Noel Gotosa <nyamazana@zol.co.zw>
> **Cc:** Edson Chidziya <(b) (6)
>
> Dear friends,

for your information and perusal

Best

Marco

Inizio messaggio inoltrato:

Da: Marco Pani <(b) (6)>
Oggetto: Sebungwe workshop preparation
Data: 29 aprile 2015 16:52:07 CEST
A: Edson Chidziya <(b) (6)>, Edson Chidziya <echidziya@zimparks.co.zw>, Olivia Mufute <omufute@zimparks.co.zw>, Olivia Mufute (b) (6)
Cc: David Cumming <(b) (6)> Lynne Taylor <lynne@thetashingainitiative.org>, "John J. Jackson III" <jjw-no2@att.net>, cjonga@campfirezimbabwe.org

Dear Edson and Olivia,

please find attached a draft document on critical points in preparation of the Sebungwe workshop.

The aim of this document is to provide a base for discussions before the workshop in order to achieve a practical and implementable action plan for this region which is so important and challenging.

Eventually it can contribute to the preparation of the agenda of the workshop.

I leave up to you the consideration of the importance to enlarge the distribution of this document to other stakeholders.

I would be happy to receive your thoughts.

Best wishes

Marco

Attachments:

SEBUNGWE WORKSHOP PREPARATIONv1.docx	126 KB
Attached Message Part	2.8 KB

SEBUNGWE WORKSHOP PREPARATION

A. Information from the 2014 Aerial Survey. (Olivia Mufute, Kevin Dunham)
   1. Elephant Densities and distribution
   2. Other Wildlife Densities and Distribution
   3. Livestock densities and distribution
   4. Poacher's Camp distribution
   5. Comparison with the 2001 and 2006 Aerial Surveys
   6. Establish realistic population goal

B. Land Use (ZPWMA, Ministry of Land)
   1. Recent Aerial Photos or Satellite Imagery
   2. Options to stop encroachment
   3. Lessons learned

C. Community-based Conservation (Chiefs, CAMPFIRE, CASS, University, Hunting Operators)
   1. Views from the Communities
      a) Indigenous
      b) New settlers
   2. CAMPFIRE Status
   3. Revenues from Wildlife Use
      a) Options for increasing the percentage of revenues retained at Community Level.
   4. Lessons learned

D. Depleted Safari Areas (ZPWMA, Hunting Operators,)
   1. Chirisa
   2. Chete
   3. Actual Status and Options to revitalize the Safari Areas
   4. Infrastructure, personnel and enabling environment

E. National Parks and Forest Areas (ZPWMA, Photo Operators)
   1. Matusadona
   2. Chirasira

3. Sijarira Forest Area
4. Infrastructure, personnel and enabling environment

F. Action Plan (Drafting Group to be selected)

1. Built from Strategic Elephant Policy and Management Framework (attached)
    a) Law Enforcement
    b) Biological Monitoring
    c) Social, Economic and Cultural Framework
    d) Building Conservation Capacity
    e) Coordination Collaboration and Programme Management.
2. How to make hunting a greater force for enhancement of elephant conservation
3. How to make photo-tourism a greater force for enhancement of elephant conservation
4. How to make local people a greater force for enhancement of elephant conservation
5. Establishment of a Regional Coordination Committee for the implementation of the Action Plan (basic rules of procedure, frequency of meetings, responsibilities.)
6. Inclusion of the Action plan into the National Plan

Outline of Strategic Elephant Policy and Management Framework

(Extract from Proceedings Hwange Safari Lodge Workshop 2-4th December 2014)

Table 1. Structure of the Strategic Elephant Policy and Management Framework

Long-term Vision	The long term vision adopted by the workshop retained the essential components of the 1997 plan
Targets	The three targets included in the 1997 policy were retained but the provision to maintain or increase elephant range not linked to a specific benchmark as it was in 1997
Key Components	The key components are the primary themes or headings of the strategy under which the framework is organised. The ten policy and management objectives included in the 1997 plan are included within these headings
Strategic Objectives	The strategic objectives reflect briefly but more explicitly the policy intention for the respective components
Outputs	The outputs are statements that reflect the expected result that will be realised during the time the plan. Outputs are therefore expressed in the past tense
Key Activities	Key activities represent the necessary and sufficient actions that need to be carried out effectively and efficiently to achieve the Outputs. They may be a subset of a wider range of activities that can be added but, as key activities, they are those that are vital to achieve the Outputs and are those on which the major emphasis should be placed.
Key Performance Indicators (KPIs)	The Key Performance Indicators provide a basis on which to measure and monitor the success or otherwise of the Strategic Objectives, Outputs and Activities.
Means of Verifying the KPIs	Means of verifying the KPIs were not developed during the Workshop and will need to be included in the Management Plan. A preliminary draft for verifying these is included in this report, as discussed at the workshop. It is important that KPIs and means of verification are standardised across the regions and areas of the country and that they can be combined in an unbiased way to reflect national progress in the implementation of the strategic plan.

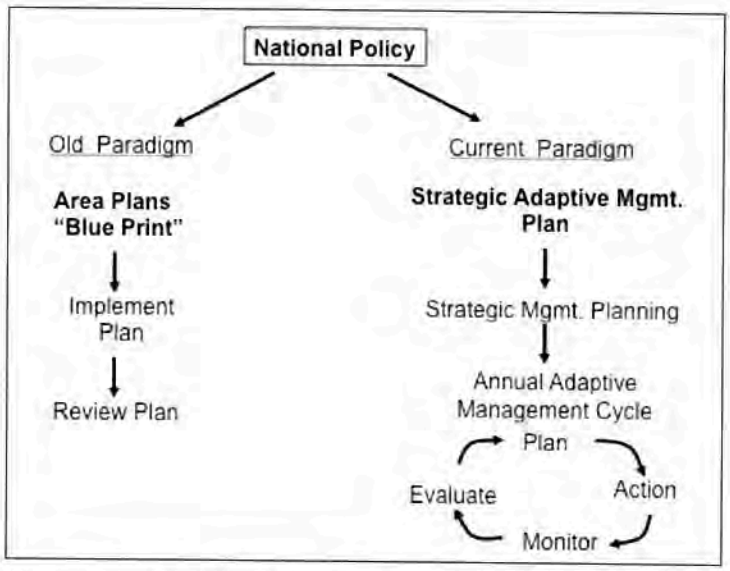

Figure 1. Resource management plans answer to national policy and legislation but in recent years have shifted from "blue print plans" to strategic adaptive management and planning. The strategic level plan developed in this workshop provides the basis for regional and local planning that includes action, monitoring and evaluation on an annual basis.

4.2 Zimbabwe Strategic Elephant Conservation Policy and Management Plan Framework (As agreed at Hwange Safari Lodge Workshop on 4 December 2014)

> ***Long-term Vision:*** To conserve elephants at levels that will enable them to contribute to the conservation of biodiversity, national development and Zimbabwe's cultural heritage

Targets:

1. To maintain at least four demographically and genetically viable elephant populations in Zimbabwe
2. To maintain or increase elephant range in Zimbabwe
3. To maintain numbers / densities of elephant at levels that do not adversely impact on biodiversity

Key Components	1. Protection and law enforcement	2. Biological Monitoring and Management	3. Social, Economic and Cultural Framework	4. Building Conservation Capacity	5. Coordination, collaboration and programme management
Strategic Objectives	**Objective 1.** Ensuring effective protection of all populations of elephant in Zimbabwe	**Objective 2.** Implementing effective biological and ecological management to achieve populations that are within upper and lower acceptable limits to change in numbers and distribution	**Objective 3.** Implementing strategies that enhance the contribution of elephant to rural livelihoods and national development	**Objective 4.** Ensuring that sufficient and appropriately trained personnel, equipment, infrastructure and financing are mobilised, available and used efficiently and effectively	**Objective 5.** Ensuring effective coordination and collaboration with national and international stakeholders to achieve these strategic objectives,
Outputs	**Output #1:** Management actions, security and law enforcement to minimise illegal losses of elephants and their habitats from all populations implemented	**Output #2:** Adaptive management to achieve viable populations in all four sub-populations implemented	**Output #3:** Fair distribution of financial benefits from elephants improved and tolerance for living with elephants increased	**Output #4:** Sufficient numbers of trained, equipped, motivated and effective personnel are deployed and operational	**Output #5:** Coordination mechanisms to assess and review adaptive elephant population management and strategic planning established and operating

Key ACTIVITIES that are required to achieve the OUTPUTS, Key performance indicators (KPIs), and means of verifying KPIs

	Output#1: *Law enforcement*	**Output #2:** *Biological monitoring and management*	**Output #3:** *Social, Economic and Cultural Framework*	**Output #4:** *Building conservation capacity*	**Output #5:** *Coordination and programme management*
Key Activities	• For each key population establish a highly trained rapid response anti-poaching unit for deployment to areas under threat • Appropriate informer systems established and supported at regional, national and local levels • Improve investigation and prosecution of crimes (collection and preservation of evidence, ballistics evidence, professional prosecution of cases, information for legal profession) • Set up National and local intelligence databases • Enhance international and transboundary collaboration in law enforcement • Enhance social (community) involvement in law enforcement • Reduce illegal settlements in all wildlife areas • Revisit the appointment	• Monitor elephant population trends and elephant impacts on biodiversity through aerial, ground and ranger-based methods, among others • Use research findings, expert opinion and informed public opinion to establish thresholds of potential concern (TPCs) to initiate management action in respect of elephant impacts for protected areas • Carry out appropriate management actions when populations exceed, or are projected to exceed, TPCs • Monitor trophy quality and adjust quotas to maintain desired levels of trophy quality • Define current elephant range and explore options for extending the range and maintaining connectivity between fragmented populations • Recognising the long response time of elephants to management	• Provide incentives and promote partnerships and joint venture opportunities to strengthen elephant management, including across boundaries • Explore additional elephant-based tourism and sustainable utilization opportunities. • Facilitate the transparent distribution of the benefits and costs of elephant management and conservation • Implement effective techniques and land use strategies to mitigate human-elephant conflict. • Promote effective recovery and use of all products from dead elephants • Include information on elephants and their conservation in school curricula and promote environmental education in rural areas adjacent to key elephant populations • Develop and implement an effective	• Secure funding to initiate the implementation of the elephant management plan • Establish sustainable funding programs to build and maintain necessary human resources and strengthen elephant conservation and management capacity • Analyse current capacity and identify needs • Initiate and/or maintain continuity in research and monitoring necessary for the conservation and adaptive management of elephants and habitats • Strengthen research capacity in ZPWMA and collaborate with other research institutions • Establish training and in-service retraining of personnel in law enforcement, research and monitoring, education and awareness, community elephant management, management	• Establish a national elephant conservation & management task force / steering committee that includes stakeholders meetings at least bi-annually to review progress and to develop an annual implementation plan • Establish four regional management committees to meetings at least twice each year and implement sub-regional plans • Strengthen links with neighbouring states to confer on the management of shared elephant populations, particularly in relation to TFCA populations • Establish a full-time elephant manager to be responsible for coordinating the implementation of the elephant management plan • Strengthen coordination between the hunting industry and the elephant management programme • Implement an effective information dissemination and communication strategy, including regular progress reports on the implementation of the plan

	Output#1: *Law enforcement*	**Output #2:** *Biological monitoring and management*	**Output #3:** *Social, Economic and Cultural Framework*	**Output #4:** *Building conservation capacity*	**Output #5:** *Coordination and programme management*
	of Honorary Officers to assist in law enforcement • Ensure full compliance with hunting regulations and quotas set	interventions, use modelling to project alternative outcomes of management	communication strategy for local, regional and international audiences	• Strive to achieve best standards for elephant management, including any forms of utilization • Engage available expertise and capacity within ZW	

	Output#1: *Law enforcement*	**Output #2:** *Biological monitoring and management*	**Output #3:** *Social, Economic and Cultural Framework*	**Output #4:** *Building conservation capacity*	**Output #5:** *Coordination and programme management*
Key Performance Indicators	• Number of dead elephants located each year • Number of dead elephants killed illegally • Percentage of animals from which tusks were recovered • Number of elephant poachers arrested • Number of successful convictions • Number of poachers sentenced (and record of sentence severity) • Patrol effort and effectiveness indices (see sample reporting form) • Number of infringements of hunting regulations • ETIS law enforcement effort ratio • Number of ivory seizures (including number of tusks and weight) • Number of joint operations	• Elephant population estimates and distribution from aerial surveys at least every three years for each of the four sub-populations • Records of all elephant deaths with data on dates, locations, cause of death, reason killed (trophy hunting, problem animal control, natural mortality, management, illegally killed elephants), age, sex, tusk size • Trophies taken as % of quota, and trend in trophy quality • Thresholds of potential concern established for each area and selected indicators of change monitored • Management actions taken in relation to TPCs being exceeded • Range expansion/contraction estimated from all available data • Use and effectiveness of corridors assessed, inter alia, from aerial surveys, ground sightings and reports, satellite collared animals • Reporting into international monitoring systems as required (e.g. AED, ETIS and MIKE)	• Policy instruments that demonstrate and establish incentives to conserve elephants • Levels of private and community investment in elephant conservation measures • Annual record of distribution of elephant derived benefits (revenue, development projects, products received by beneficiaries) • Record of Human-Elephant conflict incidents (in HEC Database) • Record of mitigation measures taken to reduce HEC (in HEC Database) • Levels of investment (funds and manpower) in mitigating HEC by ZPWMA, communities and partners • Number of poaching incidents/arrests based on prior information and leads from communities / land holders. • Trends in elephant numbers in non-protected areas	• Annual funds and resources available for elephant conservation • Record of staff training and re-training • Manpower density for protection of elephant (No of km^2/operational field person) • Effective deployment of field staff (e.g. % of available man days spent on patrol in the field) • Research person days spent on monitoring elephant population parameters in each population • Number of research-person days spent on monitoring / assessing elephant impacts in relation to TPCs • Number of researchers, programs and reports • Number of vehicle months available during the year • % of area that has secure VHF radio capacity • % of the year that the secure VHF radio system was functional • Number (or %?) of ranger stations in key population areas fully functional • Number of operational research facilities	• National and regional committees functional and meeting at specified intervals • Committee meeting minutes with actionable points approved and circulated within one month of meeting • Record of attendance at and reporting to regional and international elephant conservation bodies of which Zimbabwe is a member • Elephant manager appointed with full terms of reference • Regular reports from elephant manager on implementation

	Output#1: *Law enforcement*	Output #2: *Biological monitoring and management*	Output #3: *Social, Economic and Cultural Framework*	Output #4: *Building conservation capacity*	Output #5: *Coordination and programme management*
Means of verifying KPIs	• Numbers of dead elephants in various categories recorded at field stations, conservancies, and CAMPFIRE District Offices, compiled at regional and national levels and presented to the Regional and National Coordinating Committees (R&NCC) bi-annually • Arrests and convictions from Station and Area records and reports compiled and submitted to R&NCC • Patrol effort Indices - see under Component #4 • Hunting regulation infringements derived from SOAZ/ZPHGA reports and from field station reports compiled and presented to R&NCC • ETIS law enforcement effort ratio available from TRAFFIC • Ivory seizure details from ivory stockpile records	• Elephant population numbers, distribution, carcass ratios and trends from aerial survey reports • Elephant deaths and trophy quality - as for records under Law Enforcement with additional analysis of data and trends reported to the R&NCC bi-annually • Reports on Thresholds of Potential Concern where these have been established • Research and monitoring reports of elephant impacts in selected sites in relation to TPCs • Reports on elephant locations from ground and aerial sightings • Use of corridors based on field reports and studies of elephant movements using tracking devices • Copies of required reports sent to international monitoring systems	• Documented policies and list of operating partnerships / joint ventures that promote elephant conservation & management • Record of investments in elephant conservation measures assembled by elephant programme manager/coordinator • Summaries from Human-Elephant Conflict database reported at Annual Meeting of R&NCC • Records and annual summary of arrests and poaching incidents intercepted based on leads provided by communities • Elephant censuses that have covered non-protected areas	• Record of funds available (USD) and investment by ZPWMA, Private sector, NGOS, and CAMPFIRE in elephant conservation measures (Compiled annually by Elephant Manager / Coordinator) • Consolidated record of number of field personnel and days operational (law enforcement, research & monitoring, elephant management) for each area in the elephant range compiled and reported on at annual planning meetings • Research reports and papers on elephant conservation and management • Records of vehicle months, VHF radio operation, fully functional stations, operating research facilities, compiled and consolidated at station, area and regional levels and reported on to the R&NCC bi-annually	• Record of meetings, minutes actions completed, attendance at national and regional committee meetings • Record of when minutes of meetings were completed and circulated • Date on which terms of reference for elephant management position were completed, date the position was filled and operational • Record of reports by the person in the elephant management position

Note: It will be necessary to design record sheets that serve to standardise the manner in which records are maintained at field station, area, and regional levels so that they can be combined and summarised in a consistent manner to provide clear and transparent national level indicators of progress in the conservation and management of elephant from year to year. An example of one such form for law enforcement effort is provided below. The forms being used at MIKE sites may also be used more widely.

Subject: Fwd: Mana Pools Workshop Final Report
From: "John J. Jackson, III" <jjw-no@att.net>
Date: 5/5/2015 8:32 AM
To: Tim Vannorman <Tim_Vannorman@fws.gov>, Bryan Arroyo - FWS <bryan_arroyo@fws.gov>, Dan Ashe <dan_ashe@fws.gov>, Rosemarie Gnam <Rosemarie_Gnam@fws.gov>

Tim,

This is the final report of the Mana Pools Workshop with 43 participants.

Best,
John

John J. Jackson, III
CONSERVATION FORCE
3240 S. I-10 Service Road W., Suite 200
Metairie, Louisiana 70001
Tel: (504) 837-1233
Fax: (504) 837-1145
jjw-no@att.net
www.conservationforce.org

Attachments:

MPNP Anti-Poaching Workshop - Summary Report - 25 April 2015.pdf 1.1 MB

A collaborative workshop held by ZPWMA to develop an anti-poaching strategy for Mana Pools National Park and neighbouring Safari Areas

30 March 2015 – 2 April 2015
Chirundu Safari Lodge

Summary Report

Supported by:

JOHN STEVENS
Guided Safaris Office
30 Years
CELEBRATING 30 YEARS OF EXTRAORDINARY ADVENTURES
JOHN STEVENS
Home office Tel/Fax: + 263 4 490612 Email: john@johnstevenssafaris.com
www.johnstevenssafaris.com

AFRICAN WILDLIFE FOUNDATION®

Organised in partnership with the Mana Pools Anti-Poaching Collaborative Body

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List of Acronyms

AFZ	Air Force of Zimbabwe
AWF	African Wildlife Foundation
CAMPFIRE	Communal Areas Management Programme for Indigenous Resources
CASS	Centre for Applied Social Sciences
CUT	Chinhoyi University of Technology
ETIS	Elephant Trade Information System
JOC	Joint Operations Committee
LRT	Lowveld Rhino Trust
LZTOA	Lower Zambezi Tour Operators Association
LZV	Lower Zambezi Valley
MAPP	Matusadona Anti Poaching Project
MEWC	Ministry of Environment Water and Climate
MFA	Ministry of Foreign Affairs
MIKE	Monitoring the Illegal Killing of Elephants
MPNP	Mana Pools National Park
RDC	Rural District Council
SMART	Spatial Monitoring And Reporting Tool
TFCA	Transfrontier Conservation Area
ZNA	Zimbabwe National Army
ZPWMA	Zimbabwe Parks and Wildlife Management Authority
ZRP	Zimbabwe Republic Police

Keynote address

The evening before the start of the workshop, Tom Milliken from TRAFFIC gave an address on the global situation for elephants and the illegal ivory trade. After providing an overview of the two CITES monitoring systems - MIKE (Monitoring the Illegal Killing of Elephants) and ETIS (Elephant Trade Information System), Tom then outlined their key results. Both poaching and the illegal ivory trade had peaked from 2011-2013, and indications were that these levels were remaining unsustainably high. While Zimbabwe had made a number of seizures, which were recorded in ETIS, an equal number of seizures had been made outside of Zimbabwe, but which implicated the country (i.e. seized outside of Zimbabwe, but indicating that the shipment had originated from or passed through the country). Tom clarified that the seizures made only represented an unknown percentage of the overall movement of illegal ivory, and noted that the recent elephant survey results likely meant a loss of a large number of elephants from the Zambezi Valley since 2006, which apparently had not been captured in the ETIS data. Tom also gave an overview of shifting strategies to engage in the illegal wildlife trade, such as moving shipments through Asian transit countries to reduce likelihood of detection in Chinese ports. Finally, Tom responded to a number of questions from the group.

Welcome and opening remarks

The Director General for the Zimbabwe Parks and Wildlife Management Authority (ZPWMA), Edson Chidziya, opened the meeting. He thanked the hosts, the Chair, the committee and the delegates and welcomed all the participants. He noted that Mana Pools National Park (MPNP) cannot operate as an island in a sea of poaching and poverty. As a part of a trans-frontier conservation area, a World Heritage site, and a biosphere reserve, MPNP is a flagship site and a world-renowned tourist attraction. He noted that the purpose of the workshop was to develop effective protection strategies, based on resource mobilization and collaboration, and coordination of stakeholders, at a time when the illegal wildlife trade is threatening hard-won conservation gains. He recalled the extinction of rhinos in the Zambezi Valley and called on participants to define strategies to ensure that other species are not lost. He noted that ZPWMA had not been spared from the macroeconomic situation facing Zimbabwe and faced serious resource constraints. Despite this, ZPWMA continues to work closely with other national law enforcement agencies under a 5-year strategic plan. He closed by noting that all these strategies required the engagement of diverse stakeholders and welcomed the participation of NGOs and the private sector, wishing the group successful deliberations.

Introductions

The meeting participants introduced themselves. A full participant list is available in Annex I to this report.

Background to the workshop

Richard Maasdorp from the Zambezi Society provided a short background to the workshop. He noted that the participants in the workshop have a great diversity of skills and the hope was that those skills could be centred around a common vision. He encouraged the group to recognize that we were talking about an unsurpassed stretch of wilderness, which could be sustained for the future of Zimbabwe, forever. He also mentioned the hope that a

collaborative body could help to support the implementation of any action plan identified in this workshop.

Objectives and purpose of the workshop

The facilitator, David Cumming, introduced the agenda (see Annex II) and aims of the Workshop. As indicated in the invitation "The primary goal of the workshop is to undertake detailed stakeholder and problem analyses from which a set of solutions and associated objectives can be developed leading to an action plan for implementation." He referred to the national elephant management planning process, which had been initiated in December 2014, and the national "Outline of Strategic Elephant Policy and Management Framework" which was included in the workshop documentation (See Annex VII). The framework provided for the development of four sub-regional management plans of which the Lower Zambezi Valley was one. The key activities within the national plan would form outputs at the regional and local level with a focus on key activities to achieve effective protection and law enforcement. He noted that monitoring for adaptive management was central. The geographical focus of the meeting was confirmed to be MPNP, the outcomes of which would build towards a regional plan for the larger Lower Zambezi landscape.

Law enforcement and anti-poaching in Mana Pools

The Area Manager for MPNP, Marvellous Mbikiyana, gave a presentation on law enforcement and anti-poaching in MPNP. He noted that the Park, which is 2,196 square kilometres, is a World Heritage Site in the centre of a network of protected areas in Zimbabwe which stretch from Kariba to the Mozambique border. Much of the bank on the Zambian side of the river is also protected.

While the ideal staffing level for rangers is 110 for the Park, 75 have been approved, and only 38 are on site. Of the 38 on site, only 13 are deployable at any one time, due to a number of other commitments, such as driving duties, serving in the front office, and so on. Enforcement activities consist of regular patrols along the shoreline, boat patrols, and extended patrols into the hinterland. Patrols also respond to specific incidents where possible.

Poaching in the Park usually targets big game, and uses guns, snares and poisons. Poachers are both local and foreign, and most poaching occurs in the escarpment area. There are a number of known poaching hotspots, mostly around permanent water. These include the Kanga / Mafuku, Chiuye / Rukometchi, Nyamahwani / Kasawe / Man'ain'ai, Mazunga / Sore Sore / Matrench, and Chitake areas.

Local poachers tend to enter MPNP from Southern boundaries via rivers such as Mashayenyi, Rukometchi, Chiuye (through the gorge), Chitake and Chewore. Foreign poachers tend to use Nyakasanga river mouth to enter and exit the Park. These hotspots and entry and exit points need constant monitoring. Poachers tend to move in groups of 4-8, with at least two being armed (one with either a .458 rifle or .375 rifle and another one with an assault rifle in most cases an AK47 rifle). They carry enough food to last for almost one month, and in some cases they carry GPS systems to enable them to locate ivory caches and to retrace their route. Poachers also sometimes pretend to be mad and walk along main roads in order to undertake reconnaissance missions. Poaching and law enforcement statistics from 2009 to 2014 were presented. The statistics showed a low

number of poached animals and contacts. This may be a function of low patrol coverage and monitoring frequency.

An equipment inventory was presented. There are a number of key needs, such as vehicles, boats, and rifles. The Tashinga Initiative was thanked for its assistance in improving the radio infrastructure.

A number of strategies were proposed, including: aerial surveillance, night surveillance, strengthen intelligence gathering, extension work coordinated at station level, manning areas threatened by poisoning, mobile patrols, provision of dry ration packs to enhance quick reaction patrols, increasing the number of actionable rangers, monitoring of Nyakasanga mouth, liaison with other stations on movements, location and detection of poachers. Longer-term strategies included: establishment of tourist camp / semi permanent base at Mazunga or Nyamahwani pan, employment of required station ranger establishment, use of UAVs, construction of bridges at key crossing points.

Finally, Marvellous provided constraints and limitations, which included shortage of resources and equipment, low manpower levels, poor state of roads, and inadequate communication equipment.

There were a number of points of discussion and clarification following the presentation:

- Most of the poached elephants were bulls.
- Other species that are targeted are buffalo, usually by snare.
- Poisoning is mainly by cyanide and does not seem to have impacted vulture populations through secondary poisoning.
- There is intent to exchange information with Zambian counterparts, but to date this has not happened effectively.
- Prosecutions are tracked. Where poachers were caught with ivory, they are receiving high sentences. Where poachers are caught with no ivory, they usually are charged with illegal entry.
- Ivory is moving within Zimbabwe (if local poachers) and across to Zambia (if Zambian poachers).

Ranger patrols and monitoring in Chewore

Simba Sandram, the Area Manager for Chewore, gave a presentation on ranger patrols and monitoring. Firstly he reminded participants of the Vision and Mission Statement of ZPWMA, as well as the legal framework regulating wildlife in Zimbabwe.

In Chewore / Dande, day or local reconnaissance, extended clandestine, reaction/contact, strategic and roadblock patrols are operated. Day and local reconnaissance patrols are intended to gather information on vegetation, wildlife and illegal activity. A minimum of three rangers are deployed for a duration of less than a day long from the station administration office, either on foot or by boat, vehicle, or plane.

Extended clandestine patrols are aimed at widening ground coverage, to gather more detailed information on the terrain, local populations and poaching indicators. Movement is slower and patrolling can be done from a temporary base (hide) or the patrol team can move from one lay-up site to the next and sleep where they are at the time. A minimum of

three rangers is recommended for 7-14 nights and rangers are informed at least a day before deployment (although the route is not disclosed until rangers are en route).

Reaction (contact) patrols are carried out based on reliable intelligence that contact will be made with poachers. Rangers go out well armed and in strength and contingency plans are put in place to evacuate and treat possible casualties. The patrol is carried out in less than three days and the patrol team reacts within 30 minutes upon receiving the information.

Strategic patrols are carried out with partially or reliable information from informers, investigation team or past trends. Patrols are conducted either during the day or overnight and usually takes less than five days.

Joint patrols are planned operations based on situations that may have arisen, and are usually conducted with other law enforcement agencies e.g. ZRP, ZNA, CIO, etc. The patrol team is briefed in advance and the period of operation is determined by the outcome.

The patrol execution process includes strategic planning, briefing, deployment/execution, debriefing, data storage, and data analysis. Simba provided examples of forms for patrol briefing, MIKE elephant carcasses, and ground patrol data. He provided details on elephant mortalities in the area from 2009-2014.

Data are managed through SMART (Spatial Monitoring And Reporting Tool), which takes data and turns it into information that can be used to make decisions about park management activities. These data are managed through a quality assurance process and help conservation areas to adapt to changing threats. Finally SMART allows you to track and manage your law enforcement effort.

There were a number of points of discussion and clarification following the presentation:

- The use of cell phones on patrol is generally not encouraged, and only allowed where necessary. Cell phones used are personal cell phones. It was suggested that official cell phones may be necessary.
- Strong collaboration with stakeholders is necessary. It was acknowledged that cooperation between ZPWMA and private sector operators was crucial for anti-poaching efforts. Both photographic operators in MPNP, as well as safari operators throughout the Lower Zambezi Valley were providing fuel, transport, helicopter and other aerial assistance towards anti-poaching efforts.
- Rangers are monitored through reporting at certain times of the day.
- In 2014, 24 offenders were taken to court – some are finalized, some still pending.
- Delays in rapid patrol deployment are due to the need to have weapons and rations ready to go.
- Compliance with mining and forestry laws can also help with prosecutions.

Stakeholder analysis

A stakeholder analysis was undertaken via a card exercise to identify the key stakeholders and actors and the links between them.

Annex III outlines the results of the stakeholder analysis. Key linkages were identified:

- between ZPWMA and consumptive and non-consumptive operators (strong in some areas but could be strengthened);

- between ZPWMA and ZRP;
- between ZRP and the judiciary (could be strengthened);
- between ZPWMA and researchers (could be strengthened); and
- between ZPWMA & provincial JOC.

Key discussion points

- Are there formal lines of communication between different stakeholders, or are these ad hoc?
- The proposed Lower Zambezi Valley Collaborative Group could provide a funding and communication mechanism to support implementation.
- Lower Zambezi Tour Operators Association (LZTOA) could serve as the main stakeholder to bring operators and NGOs to the table.
- How will communications and funding be dealt with?
- If ZPWMA is the core (regional office), it needs to interact with NGOs, the private sector, communities, and other government agencies.

Problem Analysis

A detailed problem analysis was undertaken. During an initial plenary session using cards, a number of key problems were identified, which are available in Annex IV. The participants then moved into working groups to undertake a more detailed problem analysis. The detailed reports of these working groups are available in Annex V. A synthesis of the problem analysis was prepared and refined in plenary.

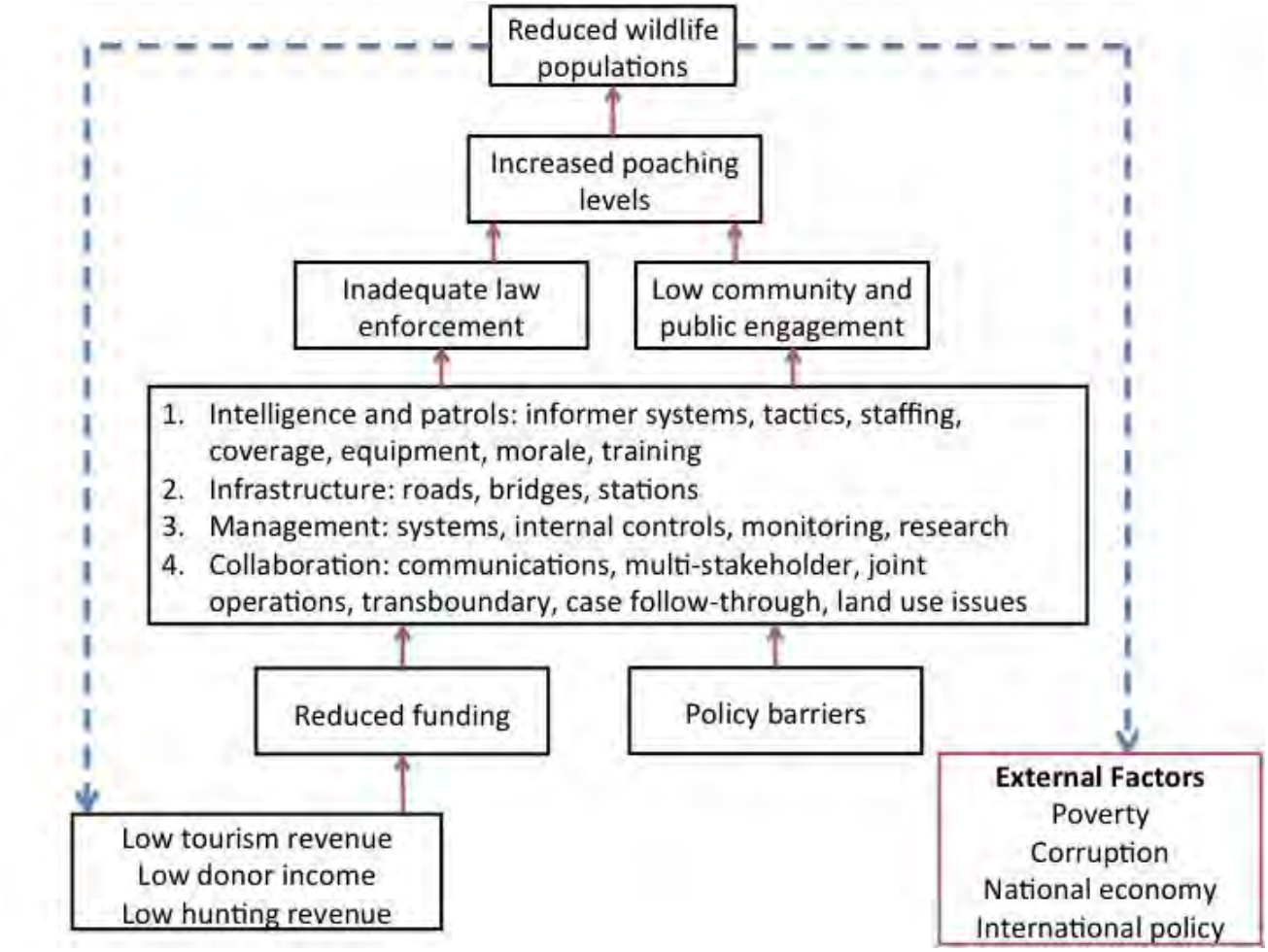

Fig. 1 Cause-effect diagramme to illustrate the main linkages and feed back loops (dashed lines) between funding, inadequate law enforcement, increased poaching and reduced wildlife populations. The four components in the central box formed the focus for four working groups to undertake more detailed problem analyses. The working group reports were then combined and examined in plenary to produce the Action Plan below.

Draft Mana Pools National Park Anti-Poaching Action Plan

The plan includes four main components:

1. Law enforcement
2. Infrastructure, equipment and access
3. Monitoring and data analysis for adaptive management
4. Stakeholder collaboration

1. Law enforcement

Output	Activities	Key Performance Indicator	Means of verification	Timeframe	Indicative costs	Lead Agency
1.1 Informer network, investigation and Intelligence system established	- Recruit informers and contacts - Recruit investigators and deploy strategically - Train investigators - Set up anonymous whistleblowing system (through hotline) - Carry out awareness campaign within communities on value of conservation and how to report illegal activity (to stimulate social enforcement) - Establish intelligence database - liaise with existing successful anti-poaching units in the Zambezi Valley (e.g. DAPU)	- Number of arrests based on information from intelligence system - Number of calls to whistle blowing system that result in effective follow up - Number of incursions reported on / reacted to by local communities	- Validation of informer record - Records and reports of training session - Whistle-blower system reports - Records / reports	Incremental set up over 1 year, then on going	Staff salaries Transport Rewards and payments to informers Telecommunications costs (Malilangwe, MAPP, Bubye Valley Conservancy, LRT, Gonarezhou, and hunting safari operators could help with budget numbers.	ZPWMA
1.2 Well equipped, trained and fully operational units in place	- Carry out an assessment / audit of current capacity, prioritise needs and mobilize resources to fill gaps - Recruit and train field rangers and research staff - Explore the Gonarezhou model for NGO	- Recruited and trained rangers and research staff operating - Number of units operating - Manpower strength, e.g. how many rangers, researchers, etc.	- HR records	Assessment within six months On going		ZPWMA / consultant

Output	Activities	Key Performance Indicator	Means of verification	Timeframe	Indicative costs	Lead Agency
	employment of cadet rangers - Conduct frequent retraining					
1.3 Patrols strengthened	- Establish effective patrolling force of 40 deployable rangers (exclusive of those on other duties or on leave) - Establish (or review?) Standard Operating Procedures - Establish regular training and retraining schedule - Establish well-equipped reaction teams - Re-examine the practice of appointing Honorary Officers.	- Number of deployable (including equipment) rangers at any one time (standard = 40) - Total man days spent on patrol - Standard Operating Procedures in Place - Number of training and retraining sessions carried out - Areas of Park patrolled each month (related to threat) - Reaction time to incidents	- Monthly reports - Subsistence claims	SOPs to be established within 3 months. Staffing to be established within 6 months. Then on going	Salaries Equipment Vehicles etc.	ZPWMA
1.4 Crime scene investigations improved	- Establish Standard Operating Procedures (to include guidelines on collaboration with ZRP, EMA, etc., evidence gathering) - Identify gaps (e.g. ballistics and forensics) and solicit external expertise - Establish regular training and retraining schedule - Procure / hire specialized equipment	- Number of arrests leading to prosecution - Number of successful prosecutions - Reports / records	- Exhibit register - Court records - Reports	SOPs to be established within 3 months. On going	Training costs Expert costs Specialized equipment	ZPWMA ZRP Tikki Hywood Trust
1.5 Prosecutions effectively supported	- Undertake appropriate processes for laying charges and preparing information for prosecution (Draft the most appropriate charge(s) and outline of state case, Secure exhibits, Peruse crime docket, Summon witnesses to court, Re-	- Number of poachers arrested during the year - Number given bail - Number convicted - Number given jail sentences - Number given mandatory sentences - Record of ZPWMA Legal Services involvement in	- Records	Substantive charge must be laid within 48 hours Awareness programme within one year, then on going	Training workshops	ZRP Judiciary ZPWMA Tikki Hywood Trust (?)

Output	Activities	Key Performance Indicator	Means of verification	Timeframe	Indicative costs	Lead Agency
	interview witnesses, Prepare pre-trial questions for state witnesses, Liaise with the investigation officer, Follow up) [include in SOPs in clear detail] - Build awareness on wildlife crime issues - prosecutors and magistrates - ZPWMA Legal Services liaise with Prosecution - Distribute Hywood Trust booklet to staff involved.	prosecution processes				
1.6 Joint operations (national and cross-border) established	- Convene joint meetings of law enforcement agencies - Conduct awareness campaigns for other law enforcement agencies - Agree on operational order / SOPs (including information sharing) - Conduct joint operations	- Number of meetings held per year - Number of successes from shared information - Number of joint operations leading to arrests and prosecutions -	- Minutes - Joint operation reports - Records - Manpower involved (by agency)	Meetings: Quarterly (national) and Monthly (cross-border) On going	Meeting costs (travel, etc.) Operational costs	ZRP **ZPWMA** ZNA
1.7 SOPs for all operations established	- Revised and adapted in the light of on going operations. Can include: - Training - Stop and search - Deployment - Aerial surveillance - Use of modern technology - Random testing for poisons - Infiltrate known poaching rings	- Number of training sessions - Number of arrests, recoveries, stop & searches conducted - Number of deployments - Number of flights and quantity of flight hours - Availability of gadgets etc. - Number of tests conducted - Number of poaching rings infiltrated - Profile of poachers - Number of forward bases and teams	- Training reports - Report - Inventory - Records	On going Aerial – fortnightly Establishment of well-equipped reaction team – within 6 months		ZPWMA

2. Infrastructure, equipment and access

Output	Activities	Key Performance Indicator	Means of verification	Timeframe	Indicative costs	Lead Agency
2.1 Main access road to Mana improved (31 km Chimutsi to Nyakisakana and 45 km Nyakisakana to Mana HQ).	- Rebuild the 31 km section (gate to gate) followed by annual grading - Regravel the 45 km section (gate to HQ) followed by annual grading - Until rebuild and regravel happen, grading is required immediately and then every three months	- Specified road standard maintained	- Reports on road status - Road user questionnaire - Number of tourist complaints	Rebuild (31km) – 6 months after funds available Regravel (45km) – 3 months after funds available Grading- immediate and on going (Ensure that Ministry of Transport has agreed for the 31 km section)	Rebuild (31 km): USD 248,000 Regravel (45km): USD 225,000 Grading: Quotes range from USD 7,000 to USD 14,000 for each time	Ministry of Transport and Infrastructural Development (31km) / ZPWMA (45km)
2.2 Internal road network (about 600km) improved (N.B. does not include concessions)	Annual: - Clear - Grade (where necessary) - Repair low crossings One-time - Repair two bridges - Replace slip drains/ culverts	- Number and distance of passable roads - Number of functional bridges / crossing points	- Annual road assessment report	Prioritise and implement over 3 months every year	Approximately USD 10,000 (needs to be revised based on 600km) annual Bridges? Culverts/slip drains - ?	ZPWMA / Tour operators
2.3 Periphery road (210 km) established [Are the east and west roads necessary and is there any need for more internal roads in the South?]	New project – opening of a 9m wide road [is this size road necessary? Or is this serving an additional purpose – e.g. fire break? This could be a major erosion hazard]	- Monitoring incursions and rapid deployment	- Monthly reporting on reduced numbers and spoor seen crossing into the park	Within 3 years	USD 180,000 Cost effectiveness to be examined	ZPWMA, targeted Funding and implementing agencies
2.4 Bicycles and motorbikes	- Bike patrols to check for any incursions	- Number of rotations done per month - Number of followups / detections	- Monthly reports		USD 5000 per year for 15 bikes. USD 6,000 per year for 4 motorbikes	ZPWMA Targeted donors

2.5 Airstrips (Mana Main)	- Regravel and build apron	- CAAZ certification	- CAAZ licence	Within one year	USD 22,000	ZPWMA, Operators
2.6 Access: 3 4x4 vehicles (operational for law enforcement only) 1 lorry 1 tractor 3 boats (1 Pelican and 2 Aluminium – 90HP Mercury or Marina) Aircraft: Microlight / Bathawk / Plane / Helicopter - rental	- Acquire vehicles and boats - Establish management and maintenance protocols and packages for vehicles and boats, including supporting a capable mechanic based at the Park. - Outsource aircraft and pilot package	- Vehicles and boats purchased and operational - Bathawk undertaking 20 hours per month on recce. - Helicopter deployments	- Management reports with tracking, logbooks - Number of sightings from the air - Number of arrests	Vehicles and boats: ASAP to 6 months Aircraft – 5-6 months	USD 230,000 for vehicles and boats Lorry and tractor Mechanic Microlight/ Bathawk rate ($25 per hour) Plane rate (to be confirmed) Helicopter rate ($800-1200 per hour)	ZPWMA FUNDING AND IMPLEMENTING AGENCIES AFZ ZPWMA
2.7 Field stations	- Undertake feasibility study for new bases and pickets in relation to hotspots. - Establish anti-poaching bases at Nyakisakana - Establish [anti-poaching or picket?] base at Sore Sore - Establish boundary pickets & hot spot pickets (refer to Maps) - [Use MPNP Management Plan Zone Plans and develop approaches for each.]	- Feasibility study completed - Number of established bases, pickets - Effective deployment of anti-poaching staff	- Reports -	Study: within 3 months Bases: within 6 months - Pickets: within 3 years	USD 60,000 per base USD 300,000 for 20 pickets	ZPWMA Funding and implementing agencies Private sector
2.8 Communications - VHF - Solar power - [Cell phones - Computer - GIS - SMART software	- Establish digital VHF radio GPS communication tracking systems across LZV (repeater links, base sets, handhelds, mobile radio sets, computers	- Established digital VHF radio GPS communication tracking systems in place and operating	- Record of coverage	Within 6 months	USD 310,000 (for all LZV)	Tashinga Initiative ZPWMA

- Cyber Tracking]	for monitoring purposes) - Complete activity list for other tech needs.					
2.9 Staff accommodation	- Review staff accommodation requirements - Refurbish existing buildings - As needed, develop staff accommodation infrastructure - Work with Rukometchi Research Station to explore posting rangers there -	- Review report completed - Number of rangers (and families) appropriately accommodated - Report on negotiations with Rukometchi	- Reports	Reports within six months Accommodation within two years	USD 20,000 per building refurbishment	ZPWMA

3. Monitoring and data analysis for adaptive management

Output	Activities	Key Performance Indicator	Means of verification	Timeframe	Indicative costs	Lead Agency
3.1 Monitoring system for wildlife populations and illegal activities established	- Carry out regular surveys (ground counts carried out by rangers) - Carry out aerial monitoring of wildlife and illegal activities - Adopt standardized databases for all stations and RDCs in LZV - Introduce ranger-based monitoring (SMART, MIKE, ETIS) across all stations in LZV - Analyze the data and use in adaptive management	- Number of surveys carried out - Number of aerial operations carried out - Number of functional databases - Reports into international systems, e.g. MIKE and ETIS - Results of timely analyses being used in adaptive management	- Databases and reports	Aerial surveys done every 3 years (LZV) Ground and waterhole counts annually Illegal activities and ground counts monthly Database and monitoring ongoing	Aerial survey – USD 150,000 Computers and software Training in SMART	ZPWMA
3.2 Trophy monitoring system in place	- Upgrade the trophy / age monitoring system, including database, for LZV [N.B. will require training] - Introduce a flexible and adaptable quota system (review fixed quota system)	- Trophy / age measurement records, returns year on year -	Completed return forms	Within a year / immediate		ZPWMA Operators
3.3 Wildlife populations and habitat in buffer zones recovered	- Motivate for review the CAMPFIRE programme - Allocate / mobilize resources for wildlife management in the buffer zones - Carryout mapping exercise and establish the extent of land use change or pressure	- Size of area affected - Direct benefits to locals from sustainable off-take	- Reviewed policy on CBNRM - Resources allocated - Land use maps	3-5 years		MEWC ZPWMA CAMPFIRE Association (Universities – CUT, CASS)

3.4 Allocation and utilization of resources improved	- Rationalization of resources - Carry out regular asset audits	Assets allocated per station	- Registers - Issue Vouchers - Reports	Immediate		ZPWMA Funding & implementing agencies
3.5 Analysis of law enforcement data on going (See section 1)	- Create database - Capture data - Training - Data synthesis - Access control -	- Databases in place - Number of training sessions held - Reports - Security mechanisms in place	- Databases - Reports	Database in place within one year On going		ZPWMA Researchers ZRP

4. Stakeholder collaboration

Output	Activities	Key Performance Indicator	Means of verification	Timeframe	Indicative costs	Lead Agency
4.1 Technical Support Team established to support implementation of the plan	- Establish membership and TORs -	- Functional Team established and meeting at specified intervals - Number of meetings and reports	- Minutes -	Within 1 month	Meetings	ZPWMA
4.2 Inter-agency and inter-ministerial collaboration improved	- Regular reporting to JOC - Regular reporting and input to Environmental Sub Committees - ZPWMA engagement with other relevant ministries and agencies	- Number of reports - Formal records of engagement	- Reports -	On going	None	ZPWMA MEWC
4.3 Effective private sector collaboration established	- Establish a formal forum for private sector bodies to interact with ZPWMA – corporates, business, and consumptive and non-consumptive operators (MUST be a constituted organization – not individuals)	- Formal recognition adopted - Formal records and engagement	- Minutes	Within 6 months	Meetings	ZPWMA
4.4 Effective NGO collaboration established	- Establish NGO coordinating body / bodies	- Functional and meeting at specified intervals	- Minutes	Within 3 months		Mana Pools Anti-Poaching Collaborative Group ZPWMA
4.5 Effective international collaboration established	- Streamline existing protocols with Zambia and Mozambique on law enforcement issues - Improve communication and operational procedures to enable	- Number of contacts between the JOC (e.g. Zambia/ Zimbabwe) - Number of contacts between the area managers of relevant parks (e.g. Mana AM and Lower Zambezi AM)	- Area Manager reports - Cross-border protocol reports	Initiate AM-AM contacts within 2 months, then on going		ZPWMA MEWC JOC (MFA)

	better cross-border linkages to fight wildlife crime					
4.6 Effective engagement with communities (link to Section 1)	- Organize needs assessment of local communities and RDCs - Establish local chiefs forum on biodiversity conservation - Awareness campaign at local level	- Meetings organized and reports prepared - Number of events performed. - Assessment of community response and links to law enforcement	- Minutes - Reports	On going		ZPWMA Funding and implementing agencies Local leadership RDCs
Action plan is promoted and adequately resourced	- Finalize action plan and budget - Agree on funding structure and roles and responsibilities - Identify strategic NGO partners (to facilitate funding) - Approach funding agencies - Manage funds -	- Anti-poaching plan and budget produced - Funding structures in place and roles/responsibilities established. - Number of grant applications prepared - Number of grants secured - Number of grants completed	- Plan	Action plan finalized in two weeks Funding and business plan established within 3 months Then on going		Funding / implementing agencies ZPWMA
4.7 Effective information dissemination and communication strategy implemented	- Undertake awareness campaign promoting and marketing the plan - Undertake regular progress reports on the implementation of the plan	- Number of campaigns - Frequency of progress reports	- Reports - Campaign materials - Press releases	Initial campaign within 6 months On going		ZPWMA Support Team Ministry of Tourism Ministry of Information

National elephant survey

Olivia Mufute, the Chief Ecologist for ZPWMA, gave a brief presentation on the national elephant survey. Zimbabwe participated in the Great Elephant Census, funded by Paul Allen, in 2014. Zimbabwe's surveys took place from 27 June to 1 November. The methodology and survey area was the same as the last countrywide survey held in 2001. At a national level, the population estimate was 82,092, a statistically insignificant decline from the 2001 estimate of 88,123. For Northwest Matabeleland, the estimate was 53,991 (2001 estimate was 49,310), a statistically insignificant increase. In the Sebungwe region, the estimate was 3,407 (2001 estimate was 13,989), a statistically significant decline of approximately 75%. In the Southeast Lowveld, the estimate was 11,120 (2001 estimate was 4,992), a statistically significant increase of around 115%. In the Zambezi Valley, the estimate was 11,657 (2001 estimate was 19,297), a statistically significant decrease of around 36%.

At the national level, if the elephant population had been growing at 5% per annum, then it should have been close to 140,000 – raising questions about 'missing' elephants. We also monitored carcasses, looking at the age of the carcasses. For most of the areas, there were few fresh or recent carcasses.

For the Zambezi Valley, most other mammals have also declined since 2001. Survey data show that those declines were happening before 2001, although elephants had been increasing up until 2001. Elephant bulls had not showed a major decline, while the cowherds had. There was evidence of encroachment into protected areas, such as Charara Safari Area, and fires in the Matetsi Safari Area. The surveys in the Zambezi Valley were carried out in June-July 2014, as opposed to July-August 2001. ZPWMA is developing a set of key research questions to help understand the dynamics in the area.

Opportunities and success factors

An analysis of the strengths, opportunities, success factors and core competencies was undertaken in a set of working groups. The detailed feedback from the working groups is available in Annex VI.

Address from Public Prosecutor, Kariba

The Public Prosecutor from Kariba joined the meeting to provide some details on his experiences dealing with wildlife crime. He clarified bail procedures, as well as noting that under the Parks and Wildlife Act, offences with certain species shift the burden of proof to the accused. He noted that there is no extradition agreement with Zambia, which means that in general the Public Prosecutor opposes bail in those cases.

A short discussion on inquests when rangers shoot poachers ensued. Rangers sometimes suffer from retribution from public inquests. While it is not currently possibly to close these inquests, the Public Prosecutor recommended that the ZPWMA legal department could compile issues for discussion with the Office of Public Prosecution.

Next steps

The meeting agreed on a number of key next steps:

1. Write up of workshop proceedings by 2 April 2015, sent to Facilitator
2. Facilitator reviews workshop proceeding by 4 April 2015
3. Circulate draft workshop proceedings and draft action plan to workshop participants by 7 April 2015
4. Comments from participants by Tuesday 14 April 2015.
5. Final workshop proceedings and plan circulated by Tuesday 21 April 2015.
6. Business plan and budget finalized by 30 May 2015.
7. Next meeting “open”.

Meeting close

Closing remarks were made by the Director-General, who thanked participants for their commitment and dedication. The Regional Manager, Northern Region, gave the vote of thanks, thanking the donors and organizers (The Tashinga Initiative, Zambezi Society, John and Nicci Stevens, Kavinga Safaris, AWF). He expressed particular thanks to the Director-General for his comprehensive participation in and support for the initiative. He also thanked those who had travelled a long way to attend the workshop. He expressed particular appreciation to the members of the private sector and of other government agencies for taking time out of their busy schedules to attend the workshop. Finally, he thanked the facilitation team and the Chirundu Safari Lodge.

To close the meeting, Lynne Taylor of The Tashinga Initiative presented Marvellous Mbikiyana, the Area Manager for Mana Pools National Park, with Easter eggs for the community at Mana Pools National Park.

List of Annexes

Annex I – Participant list
Annex II – Agenda
Annex III – Stakeholder analysis
Annex IV – Initial problem analysis
Annex V – Problem analysis – working group feedback
Annex VI – Opportunities and success factors – working group feedback
Annex VII – Outline of Strategic Elephant Policy and Management Framework
Annex VIII – Comments received during document review

Annex I – Participant list

Participants

First name	Last name	Organization	Position	Email	Area
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Annex II – Agenda

A collaborative workshop held by ZPWMA to develop an anti-poaching strategy for Mana Pools National Park and neighbouring Safari Areas
Venue: Chirundu Date: 30th March to 2nd April, 2015

Day 1 - Monday 30th March
1500: Arrivals settle in, fishing, sundowner cruises
1900: Welcome Dinner with Address by TRAFFIC - (T. Milliken)
Day 2 - Tuesday 31st March
0800: Welcome and Opening Remarks - DG - ZPWMA
0815: Introductions
0830: Background to the workshop - R. Maasdorp, Zambezi Society
0845: Objectives and Purpose of the Workshop - Facilitator
0900: Law enforcement and anti-poaching in Mana Pools - Area Manager (Mana) Mbikiyana
0930: Ranger patrols and monitoring - Area Manager (Chewore) Sandram
1000: TEA/COFFEE
1030: 1st Working Session: Stakeholder Analysis - who are the key stakeholders and actors and what are the links between them? (Plenary)
1245: LUNCH
1400: 2nd Working Session - Problem Analysis - What are the key issues and the cause-effect relationships ships between them? (Working Groups on selected themes?)
1530: TEA/COFFEE
1600: Report back from Working Groups
1640: Synthesise results and Finalise Problem Analysis
1730: Break for the evening (Fishing and/or sun downer cruise)
1900: DINNER
Day 3 - Wednesday 1st April
0800: 3rd Working Session: Strengths and Opportunities
0800: What are the opportunities (external factors)? - Working Groups
0900: Report back from Working Groups
0930: What are our success factors and core competencies? Working Groups
1030: TEA/COFFEE
1100: Report back from Working Groups
1130: 4th Working Session: Develop Draft Strategic Action Plan with Indicators - Working Groups
1245: LUNCH
1400: Report back on Strategic Options
1500: Synthesis of Strategic Options and Priorities
1530: TEA/COFFEE
1600: 5th Working Session: Activities, responsibilities and Costs - Working Groups
1700: Report back to plenary by Working Groups
1745: Break for the evening
Day 4 - Thursday 2nd April
0730: 6th Working Session: Development of Draft Strategic Action Plan with performance indicators and next steps
0945: Closing Remarks - DG - ZPWMA
1000: Participants Depart

Annex III – Stakeholder analysis

Stakeholder analysis – by sector

Law enforcement	Private Sector	Monitoring	NGOs	Communities	Ministries	District Admin	Cross-border	Other
PWMA	Lower Zambezi Tour Operators Association	Monitoring Systems (MIKE & ETIS)	Tashinga Initiative	Traditional leadership	MEWC	Hurungwe RDC	TFCA	Poachers
ZRP	Mana Pools Tour Operators	Researchers	AWF	Local communities	ZTA	Mbire RDC	ZAWA	
ZRP Support Unit Foxtrot Troop	Mongwe Fishing Camps	IUCN	WEZ	Local chief	Ministry of Education		Conservation Lower Zambezi	
Judiciary / Magistrate	RIFA Safari Area	UZ	Conservation Force	CAMPFIRE	EMA		Chiawa GMA	
ZRP Minerals & border Control Unit	Agricair (Aircraft Operators)	Tsetse Research	Lower Zambezi Collaborative Body		Ministry of Agriculture			
ZNA Chirundu	Kavinga Safaris		Zim 4X4 Club		Ministry of Health			
ZRP Ground to Air Surveillance	Afri-Hype Parks & Wildlife (Pvt) Ltd				Immigration			
JOC	Non-consumptive Safari operator				ZINARA			
INTERPOL	Mana Operator Natureways				Ministry of Mines			
	Hunters Africa Safari Operator				Ministry of Energy			
	Hurungwe Safaris (hunting operator)				ZINWA			

Law enforcement	Private Sector	Monitoring	NGOs	Communities	Ministries	District Admin	Cross-border	Other
	Tourists				Members of Parliament			
	ZATSO							
	SOAZ							
	ZPHGA							
	DAPU							
	Chifuti							
	HHK							
	CM Safaris							
	Wilderness Safaris							

Stakeholder analysis by proximity to the issue (i.e. levels of engagement in Mana Pools National Park)

Core	Secondary	Periphery
PWMA	Zambezi Society	MEWC
Tour Operators	Agricair (aircraft operator)	EMA
TI	Non-consumptive safari operators	Tourists
ZRP	WEZ	Ministry of Mines
Tsetse Research	4X4 Club	Mbire RDC
Researchers	Hurungwe RDC	Judiciary / Magistrates
	Wilderness Safaris	ZAWA
	Hunters Africa Safari Operator	Chiawa GMA
	Afri-Hype Parks	Conservation Lower Zambezi
	Kavinga	JOC
	RIFA Safari Area	Interpol
	Mongwe Fishing Camps	

	Ministry of Health	
	ZNA	
	ZINWA	
	Local communities	
	Traditional leadership	
	CAMPFIRE	

Annex IV - Initial problem analysis

Funding & resources	Coordination	Corruption	Patrols	Policy	Access	Poverty	Other
Financial constraints	Lack of coordinated effort in inventing modern technology	organized poaching & corruption	Agencies (law enforcement) should discuss what they intend to achieve before they deploy or patrol an area	Absence of stiffer sentences on the accused / arrested	Inaccessibility of road network	Poverty has caused communities to turn against wildlife for survival	Mistrust
Lack of funding	Lack of cooperation between key players in the area	Corruption	Lack of manpower to cover all the ground and emphasis should be made on the training aspect	Lobbying for stiffer sentences	Accessibility	Community poverty	Failure of the protectionism model
Funding	Lack of strong dedicated leadership		Limited access for patrols and reaction	Indemnity	Improve condition of road network in parks areas	Greed / poverty	Informer payment mercenary type of informers

Funding & resources	Coordination	Corruption	Patrols	Policy	Access	Poverty	Other
Funding	Participation and commitment		men on the ground		Poor state of access roads	Climate change affecting agriculture - people resort to poaching	
Depressed earnings from tourism	Lack of collaborative effort among stakeholders		poor ground coverage - low detection and deterrence				
I am of the opinion that there is inadequate funding involved in the conservation of all animals and those who police the laws	Clear & effective structure		Patrols				
Funding	Implementation systems		effective patrols along the rivers				
Lack of resources but focus being on harnessing what is currently available to achieve more in terms of law	Communication						

Funding & resources	Coordination	Corruption	Patrols	Policy	Access	Poverty	Other
enforcement							
no donor funding							
Anti-poaching resources constraint							
Resource constraints							
Many power shortages because of financial support							
Transport shortage due to lack of funding							

Annex V – Problem analysis working group feedback

Group 1

Funding

Internal funding
- poor revenue base
- competing needs (e.g. PAC)
- poor cash flow realized as a low number of tourists

External funding
- reduced donor support
- currently small-scale donor funding channelled through other donors, e.g. Tashinga Initiative
- large-scale donor funding affected by poor government relations

Solutions
- Channel external funding through supporting NGOs (e.g. WWF, Tashinga Initiative)
- Get assistance from government through budget allocations
- Formulate a clear plan that attracts investors

Effectiveness of law enforcement

- Coverage is uneven
- Deployments are biased towards easily accessible areas
- Manpower levels are low
- Motivated and skilled leadership inadequate
- Recruitment and selection criteria not implemented
- Fitness levels are not adequate
- Training and skills development is poor
- Conditions of service are poor – living and working conditions, remuneration, assurance, and back up services, insurance, rewards/incentives.

Equipment is inadequate
- Radios
- GPS
- strictly controlled use of cell phones
- Firearms (serviceable)
- Readily available air support
- More suitable vehicles
- JCB vehicles
- Camping and patrol equipment

Intelligence gathering is poor
- network system
- poor coordination of information and ineffective communication system

Community involvement is poor

Solutions

- improve access to the southern part of the Park
- management of the deployment period (14 day extended patrols?)

Coordination

- Promote more joint patrols between key stakeholders
- Better coordination among stakeholders in resource mobilization and information sharing
- joint planning between stakeholders
- Joint investigations and interrogations
- Communication

Linkages

Coordination – Funding
Funding – Coordination
Coordination – effective law enforcement
Funding – effective law enforcement

Group 2

Manpower

- Present manpower is not adequate. Ideal should be 75 trained and fully equipped deployable rangers.

Fully equipped, motivated and trained rangers

- Not the current situation

Communication networks

- Establish proper networks between relevant stakeholders inside & outside the Park
- Community engagement / awareness
    - CAMPFIRE strengthening policy issue
    - Chiefs Indaba – listen

Infrastructure

- Enabling environment (roads, accommodation, energy, water, community, education) is not adequate.
- Forward bases are not fully equipped
    - Nyakisakana
    - Mazunga

Group 3

Funding and capacity issues

- low manpower
- low budget

- shortage of equipment
- lack of motivation and morale
- poor accessibility

Poor communication
- Lack of effective collaboration amongst stakeholders – not only law enforcement, but also private sector. Extends to NGOs and ZPWMA.
- Lack of radio communication

Poverty and lack of awareness on wildlife issues
- Lack of education in wildlife issues
- lack of alternative livelihood
- lack of perceived and tangible benefits

Lack of appreciation of value of wildlife
- at community level
- at judicial level – lack of effective sentencing, insufficient field training and intelligence gathering

Change in land use patterns
- encroachment
- lack of fences (is it time to look at this issue?)

Transboundary land use conflicts
- specifically along Zambezi River, between ZW, ZM and MZ.

Corruption
- age old and pervasive

Questions
- Lack of effective sentencing – is that really true? Sentences are strong, but evidence gathering is poor, and data on follow through to prosecution often not available. Some magistrates still need information and training.
- Fencing – general discussion. Must look at inherent weaknesses of the current law enforcement approach.
-

<u>Group 4</u>

Policy

- Decision-making within ZPWMA is too slow.
- Indemnity is an issue (solution - honorary officers, police reservists)
- UAVs?
- Other acts such as forestry and mining – contextualization, training
- Stiffer penalties need to be implemented effectively and reviewed (e.g. trespassing).
- CAMPFIRE – review and revamp
- Parks use of motorbikes not allowed

Training
- Ranger

    - Operational, legal, evidence, scene attendance
    - Investigation
    - Driving – defensive & 4X4 skills
    - GPS, GoPro, Radio
    - Tracking skills
    - Use of Operational Procedures and special tactics
    - Weapons training
- Management skills
- Conditions of service – morale
- Boat handling
- Courts

Access
- Rehab existing roads
- Additional reach
- Bridges
- Airstrips are OK (don't need).
- Scope of work
- Collaborating
- Funding

Corruption and collaboration
- mind set change – conditions of service, incentives, barefoot example.
- Research drivers of corruption
- PWMA cell phones (no personal phones)
- Poor conditions of service lead to illegal hunting (rations) or complicity with poachers
- Alleged hunter complicity (rations)

Equipment
- 4X4, quadbikes
- Access to aircover
- Sell old boats and secure appropriate types

Ranger motivation and morale
- conditions of service
- timeous pay
- incentive fund
- legality of reward for successes
- equipment
- housing
- Head Office visits and briefings
- Regional recognition

Funding
- improved $$
- coordination and collaboration centralized both consumptive and non-consumptive
- ration killing leads to PR problems with some donors
- "infrastructure for lease" – i.e. capital investments instead of lease fee

Cross-Border

- Interpol
- Zimbabwe JOC & Zambia JOC

Community

- no known initiatives
- Poverty, lack of awareness
- local community leadership
- CSR
- CAMPFIRE Review and rehabilitation
- No sense of ownership
- Free access for local schools and community leaders
- Lack of feedback all stakeholders
- Improve and assist with farming methods
- Projects proactive
- Curio outlet

Patrols

- Only 13 active rangers
- Quality, equipment, access, mobility, reaction time, supervision & accountability
- New tactics & methods – forward camps, focusing on hot spots and so on.
- Boundaryless synergies – should we focus on a specialist crowd that deals with the escarpment and another that deals with the flat land
- Microlight - air cover
- Local stakeholder command centre

Other

- Lack of 'invested' operators in Nyakasanga and Sapi
- Park Plan LZV rather than just Mana.

Linkages

Access
Policy (quad bikes)
Equipment
Funding
Incentives
Fly camps
COS
Database

Access
Air/Drones
Mobility (vehicles)
Border crossing
Morale (housing / COS)
Effective Patrols
Community information
Recruitment
Tactics
Equipment
Training

Annex VI - Opportunities and success factors – working group feedback

Group 1

Opportunities

- Partnerships – e.g. NGO, Government, Private, Communities. Assist with pooling of resources, community participation, targeting embassies
- Realignment of the law in terms of the constitution (tightening our legislation)
- TFCA (Lower Zambezi) – joint marketing, joint law enforcement, joint management
- World Heritage Site – great opportunity for funding
- Review of CAMPFIRE – rebuild confidence, other alternative land use, fire management, participation of communities in tourism, additional eyes and ears on the ground.
- Advanced technology – night vision, internet, cyber tracking, UAVs

Strengths

- Wilderness value
- Local knowledge
- Skilled manpower – supportive education
- Management commitment
- Supportive local leadership
- Dedication and loyalty (both management and employees)
- Availability of informers
- Availability of manpower (labour) from local communities
- Stakeholder collaboration – pooling resources, technical skills, create synergies.
- Large biodiversity

Group 2

Internal – LZV
External – outside LZV

Internal strengths

- PA lies under one management and no conflict of interest as to how the area is managed.
- Existing infrastructure, skills and abilities.
- Mana wildlife population has not crashed (yet)
- Zambezi Valley – Mana Pools – is a jewel in Zimbabwe's crown. Biodiversity and richness of the Zambezi Valley.
- Willingness of all ZV stakeholders to work together for a common vision.
- Operator support (could be more organized and structured)
- Data collection / monitoring
- Aerial support (Agricair, Microlight association, Chifuti Helicopter)
- Increased collaboration with all stakeholders – law enforcement agencies, operators, NGOS – both supportive and implementation agencies.
- Availability of technical support to Parks – Training, Honorary rangers, law enforcement.
- Communities – harness skills and gain support – make inclusive employment.
- Upgrading status of Sapi Safari Area to stand alone station.

- Research

External opportunities

- Build on enhancement of public awareness through tour operators
- Operator support – harness support from clients towards conservation
- Research – build on current data – harness availability of international researchers
- Monitoring / surveillance technology
- Increased collaboration with all stakeholders (clients/NGOs)
- Technical support – harness funding
- Communities (explore Namibia model) – IUCN Beyond Enforcement advisory bodies
- Upgrading status of safari areas – permanent presence of clients and funding

Group 3

Opportunities

- Resilient ecosystem (rich biodiversity)
- World Heritage Status – easy to draw attention
- Established tour operators
- Surrounded by other PAs – no hard edge effects, no encroachment
- Good vantage points used as observation points
- Donor interest
- Potential increase in tourism coverage
- Potential to fund itself (*ceteris paribus*)

Strengths

- Traditional leaders' support from local community in Chundu
- Strong legal framework to support law enforcement
- Current experience and skills
- Government support through other law enforcement agencies
- Infrastructural strength (airstrip, floodplain access good)
- Reaction unit presence (to be located at Mana Pools)
- Adequate and serviceable firearms
- Tourists coverage of the Park (although seasonal)
- Commitment by staff
- Inter-state joint patrols, especially with Zambian personnel (if it has been moved back to government from ZAWA)
-

Group 4

External opportunities

- International commitment to fight wildlife crime is massive and diverse
- Mana has huge international profile
- Partnerships – private sector/NGO/public/state
- Bilateral relationship with neighbouring countries (Zambia)
- Improved technological systems are available
- Ability to exploit available international networks and expertise

Internal strengths

- Good local ability – good

- Capacity (skills ad experience)
- Will (teamwork) for stakeholders to work together
- Sharing of technology and systems
- Contiguous system of Protected Areas (Gache Gache) to Mozambique border
- Knowledge of the area
- Potential for development of tourist facilities (roads) in southern sector of the Park.
- Government departs are available to support Parks
- Potential for immediate revenue increase through an upgrade to the central booking office
- Honorary officers are volunteers
- Revival of CAMPFIRE
- High value of wildlife & wilderness area

Annex VII – Outline of Strategic Elephant Policy and Management Framework

(Extract from Proceedings Hwange Safari Lodge Workshop 2-4th December 2014)

Table 1. Structure of the Strategic Elephant Policy and Management Framework

Long-term Vision	The long term vision adopted by the workshop retained the essential components of the 1997 plan
Targets	The three targets included in the 1997 policy were retained but the provision to maintain or increase elephant range not linked to a specific benchmark as it was in 1997
Key Components	The key components are the primary themes or headings of the strategy under which the framework is organised. The ten policy and management objectives included in the 1997 plan are included within these headings
Strategic Objectives	The strategic objectives reflect briefly but more explicitly the policy intention for the respective components
Outputs	The outputs are statements that reflect the expected result that will be realised during the time the plan. Outputs are therefore expressed in the past tense
Key Activities	Key activities represent the necessary and sufficient actions that need to be carried out effectively and efficiently to achieve the Outputs. They may be a subset of a wider range of activities that can be added but, as key activities, they are those that are vital to achieve the Outputs and are those on which the major emphasis should be placed.
Key Performance Indicators (KPIs)	The Key Performance Indicators provide a basis on which to measure and monitor the success or otherwise of the Strategic Objectives, Outputs and Activities.
Means of Verifying the KPIs	Means of verifying the KPIs were not developed during the Workshop and will need to be included in the Management Plan. A preliminary draft for verifying these is included in this report, as discussed at the workshop. It is important that KPIs and means of verification are standardised across the regions and areas of the country and that they can be combined in an unbiased way to reflect national progress in the implementation of the strategic plan.

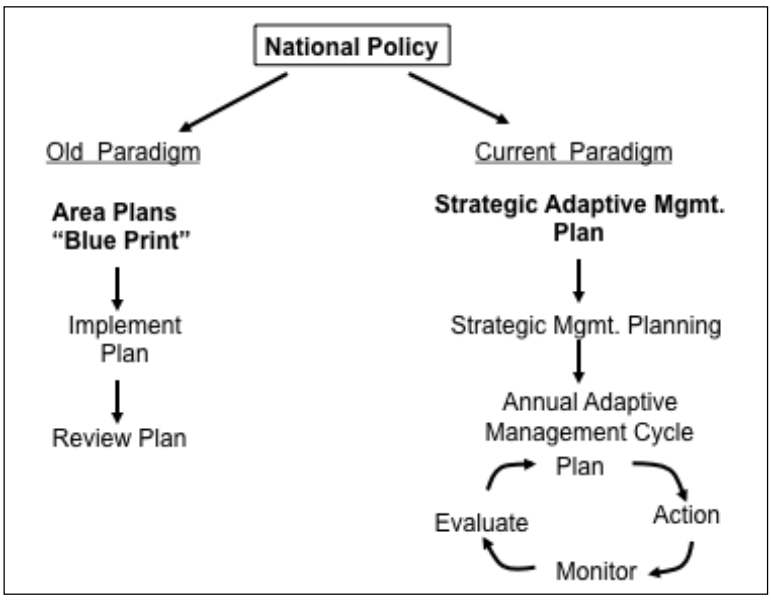

Figure 1. Resource management plans answer to national policy and legislation but in recent years have shifted from "blue print plans" to strategic adaptive management and planning. The strategic level plan developed in this workshop provides the basis for regional and local planning that includes action, monitoring and evaluation on an annual basis.

4.2 Zimbabwe Strategic Elephant Conservation Policy and Management Plan Framework (As agreed at Hwange Safari Lodge Workshop on 4 December 2014)

Long-term Vision: To conserve elephants at levels that will enable them to contribute to the conservation of biodiversity, national development and Zimbabwe's cultural heritage

Targets:

1. To maintain at least four demographically and genetically viable elephant populations in Zimbabwe
2. To maintain or increase elephant range in Zimbabwe
3. To maintain numbers / densities of elephant at levels that do not adversely impact on biodiversity conservation goals while contributing to economically viable and sustainable wildlife-based land uses

Key Components	**1. Protection and law enforcement**	**2. Biological Monitoring and Management**	**3. Social, Economic and Cultural Framework**	**4. Building Conservation Capacity**	**5. Coordination, collaboration and programme management**
Strategic Objectives	**Objective 1**. Ensuring effective protection of all populations of elephant in Zimbabwe	**Objective 2.** Implementing effective biological and ecological management to achieve populations that are within upper and lower acceptable limits to change in numbers and distribution	**Objective 3.** Implementing strategies that enhance the contribution of elephant to rural livelihoods and national development	**Objective 4.** Ensuring that sufficient and appropriately trained personnel, equipment, infrastructure and financing are mobilised, available and used efficiently and effectively	**Objective 5**. Ensuring effective coordination and collaboration with national and international stakeholders to achieve these strategic objectives,
Outputs	**Output #1:** Management actions, security and law enforcement to minimise illegal losses of elephants and their habitats from all populations implemented	**Output #2:** Adaptive management to achieve viable populations in all four sub-populations implemented	**Output #3:** Fair distribution of financial benefits from elephants improved and tolerance for living with elephants increased	**Output #4:** Sufficient numbers of trained, equipped, motivated and effective personnel are deployed and operational	**Output #5:** Coordination mechanisms to assess and review adaptive elephant population management and strategic planning established and operating

Key ACTIVITIES that are required to achieve the OUTPUTS, Key performance indicators (KPIs), and means of verifying KPIs

	Output#1: ***Law enforcement***	**Output #2:** ***Biological monitoring and management***	**Output #3:** ***Social, Economic and Cultural Framework***	**Output #4:** ***Building conservation capacity***	**Output #5:** ***Coordination and programme management***
Key Activities	• For each key population establish a highly trained rapid response anti-poaching unit for deployment to areas under threat • Appropriate informer systems established and supported at regional, national and local levels • Improve investigation and prosecution of crimes (collection and preservation of evidence, ballistics evidence, professional prosecution of cases, information for legal profession) • Set up National and local intelligence databases • Enhance international and transboundary collaboration in law enforcement • Enhance social (community) involvement in law enforcement • Reduce illegal settlements in all	• Monitor elephant population trends and elephant impacts on biodiversity through aerial, ground and ranger-based methods, among others • Use research findings, expert opinion and informed public opinion to establish thresholds of potential concern (TPCs) to initiate management action in respect of elephant impacts for protected areas • Carry out appropriate management actions when populations exceed, or are projected to exceed, TPCs • Monitor trophy quality and adjust quotas to maintain desired levels of trophy quality • Define current elephant range and explore options for extending the range and maintaining connectivity between fragmented populations • Recognising the long response time of elephants to management interventions, use modelling to project alternative outcomes of management	• Provide incentives and promote partnerships and joint venture opportunities to strengthen elephant management, including across boundaries • Explore additional elephant-based tourism and sustainable utilization opportunities. • Facilitate the transparent distribution of the benefits and costs of elephant management and conservation • Implement effective techniques and land use strategies to mitigate human-elephant conflict. • Promote effective recovery and use of all products from dead elephants • Include information on elephants and their conservation in school curricula and promote environmental education in rural areas adjacent to key	• Secure funding to initiate the implementation of the elephant management plan • Establish sustainable funding programs to build and maintain necessary human resources and strengthen elephant conservation and management capacity • Analyse current capacity and identify needs • Initiate and/or maintain continuity in research and monitoring necessary for the conservation and adaptive management of elephants and habitats • Strengthen research capacity in ZPWMA and collaborate with other research institutions • Establish training and in-service retraining of personnel in law enforcement, research and monitoring, education and awareness, community elephant management, management • Strive to achieve best standards for elephant management, including any forms of utilization • Engage available expertise and capacity within ZW	• Establish a national elephant conservation & management task force / steering committee that includes stakeholders meetings at least bi-annually to review progress and to develop an annual implementation plan • Establish four regional management committees to meetings at least twice each year and implement sub-regional plans • Strengthen links with neighbouring states to confer on the management of shared elephant populations, particularly in relation to TFCA populations • Establish a full-time elephant manager to be responsible for coordinating the implementation of the elephant management plan • Strengthen coordination between the hunting industry and the elephant management programme • Implement an effective information dissemination and communication strategy, including regular progress reports on the implementation

	Output#1: *Law enforcement*	Output #2: *Biological monitoring and management*	Output #3: *Social, Economic and Cultural Framework*	Output #4: *Building conservation capacity*	Output #5: *Coordination and programme management*
	wildlife areas • Revisit the appointment of Honorary Officers to assist in law enforcement • Ensure full compliance with hunting regulations and quotas set		elephant populations • Develop and implement an effective communication strategy for local, regional and international audiences		of the plan

	Output#1: *Law enforcement*	Output #2: *Biological monitoring and management*	Output #3: *Social, Economic and Cultural Framework*	Output #4: *Building conservation capacity*	Output #5: *Coordination and programme management*
Key Performance Indicators	• Number of dead elephants located each year • Number of dead elephants killed illegally • Percentage of animals from which tusks were recovered • Number of elephant poachers arrested • Number of successful convictions • Number of poachers sentenced (and record of sentence severity) • Patrol effort and effectiveness indices (see sample reporting form) • Number of infringements of hunting regulations • ETIS law enforcement effort ratio • Number of ivory seizures (including number of tusks and weight) • Number of joint operations	• Elephant population estimates and distribution from aerial surveys at least every three years for each of the four sub-populations • Records of all elephant deaths with data on dates, locations, cause of death, reason killed (trophy hunting, problem animal control, natural mortality, management, illegally killed elephants), age, sex, tusk size • Trophies taken as % of quota, and trend in trophy quality • Thresholds of potential concern established for each area and selected indicators of change monitored • Management actions taken in relation to TPCs being exceeded • Range expansion/contraction estimated from all available data • Use and effectiveness of corridors assessed, inter alia, from aerial surveys, ground sightings and reports, satellite collared animals • Reporting into international monitoring systems as required (e.g. AED, ETIS and MIKE)	• Policy instruments that demonstrate and establish incentives to conserve elephants • Levels of private and community investment in elephant conservation measures • Annual record of distribution of elephant derived benefits (revenue, development projects, products received by beneficiaries) • Record of Human-Elephant conflict incidents (in HEC Database) • Record of mitigation measures taken to reduce HEC (in HEC Database) • Levels of investment (funds and manpower) in mitigating HEC by ZPWMA, communities and partners • Number of poaching incidents/arrests based on prior information and leads from communities / land holders. • Trends in elephant numbers in non-protected areas	• Annual funds and resources available for elephant conservation • Record of staff training and re-training • Manpower density for protection of elephant (No of km^2/operational field person) • Effective deployment of field staff (e.g. % of available man days spent on patrol in the field) • Research person days spent on monitoring elephant population parameters in each population • Number of research-person days spent on monitoring / assessing elephant impacts in relation to TPCs • Number of researchers, programs and reports • Number of vehicle months available during the year • % of area that has secure VHF radio capacity • % of the year that the secure VHF radio system was functional • Number (or %?) of ranger stations in key population areas fully functional • Number of operational research facilities	• National and regional committees functional and meeting at specified intervals • Committee meeting minutes with actionable points approved and circulated within one month of meeting • Record of attendance at and reporting to regional and international elephant conservation bodies of which Zimbabwe is a member • Elephant manager appointed with full terms of reference • Regular reports from elephant manager on implementation

	Output#1: *Law enforcement*	Output #2: *Biological monitoring and management*	Output #3: *Social, Economic and Cultural Framework*	Output #4: *Building conservation capacity*	Output #5: *Coordination and programme management*
Means of verifying KPIs	• Numbers of dead elephants in various categories recorded at field stations, conservancies, and CAMPFIRE District Offices, compiled at regional and national levels and presented to the Regional and National Coordinating Committees (R&NCC) bi-annually • Arrests and convictions from Station and Area records and reports compiled and submitted to R&NCC • Patrol effort Indices - see under Component #4 • Hunting regulation infringements derived from SOAZ/ZPHGA reports and from field station reports compiled and presented to R&NCC • ETIS law enforcement effort ratio available from TRAFFIC • Ivory seizure details from ivory stockpile records	• Elephant population numbers, distribution, carcass ratios and trends from aerial survey reports • Elephant deaths and trophy quality - as for records under Law Enforcement with additional analysis of data and trends reported to the R&NCC bi-annually • Reports on Thresholds of Potential Concern where these have been established • Research and monitoring reports of elephant impacts in selected sites in relation to TPCs • Reports on elephant locations from ground and aerial sightings • Use of corridors based on field reports and studies of elephant movements using tracking devices • Copies of required reports sent to international monitoring systems	• Documented policies and list of operating partnerships / joint ventures that promote elephant conservation & management • Record of investments in elephant conservation measures assembled by elephant programme manager/coordinator • Summaries from Human-Elephant Conflict database reported at Annual Meeting of R&NCC • Records and annual summary of arrests and poaching incidents intercepted based on leads provided by communities • Elephant censuses that have covered non-protected areas	• Record of funds available (USD) and investment by ZPWMA, Private sector, NGOS, and CAMPFIRE in elephant conservation measures (Compiled annually by Elephant Manager / Coordinator) • Consolidated record of number of field personnel and days operational (law enforcement, research & monitoring, elephant management) for each area in the elephant range compiled and reported on at annual planning meetings • Research reports and papers on elephant conservation and management • Records of vehicle months, VHF radio operation, fully functional stations, operating research facilities, compiled and consolidated at station, area and regional levels and reported on to the R&NCC bi-annually	• Record of meetings, minutes actions completed, attendance at national and regional committee meetings • Record of when minutes of meetings were completed and circulated • Date on which terms of reference for elephant management position were completed, date the position was filled and operational • Record of reports by the person in the elephant management position

	Output#1: *Law enforcement*	Output #2: *Biological monitoring and management*	Output #3: *Social, Economic and Cultural Framework*	Output #4: *Building conservation capacity*	Output #5: *Coordination and programme management*
Note: It will be necessary to design record sheets that serve to standardise the manner in which records are maintained at field station, area, and regional levels so that they can be combined and summarised in a consistent manner to provide clear and transparent national level indicators of progress in the conservation and management of elephant from year to year. An example of one such form for law enforcement effort is provided below. The forms being used at MIKE sites may also be used more widely.					

Elephant mortality and law enforcement annual reporting form - a draft example of data that may be required from each station

SEE NOTES BELOW	Name of person completing this data form					
	Date on which this data from was completed					
	Name of area covered					
	Size of area in km^2					
	YEAR	2015	2016	2017	2018	2019
	Date of aerial census population estimate					
	Aerial census elephant population estimate (number)					
	Aerial census carcass ratio (%)					
	Number of natural mortalities					
	Number of tusks recovered					
	Number killed illegally					
	Number killed on PAC					
	No killed for rations					
	Number killed on trophy hunts					
	Number of carcasses found that died in previous years					
	Total mortalities					
1	Number of elephant poaching incursions/attempts detected					
	Number of incursions/poaching attempts intercepted					
	Elephant poachers arrested during the year					
	- How many were given bail					
	- How many were given jail sentences?					
2	- Of these how many received mandatory sentences?					
	Number of poachers killed during the year					
	Number of firearms recovered from poachers					
3	Total man-days spent on patrol					
4	Average number of staff available to patrol at any one time					
5	Total number of vehicle months available during the year					
6	% of the area that has secure VHF radio communications					
7	% of the year that that the VHF system was functional					
8	Number of incursions reported on / reacted to by local community					
9	Hunting regulations infringements					

NOTES:

1	These are incursions into the area by poachers clearly intending to use firearms, poison, heavy snares, etc. to kill elephants and/or rhinos, or attempted incursions that were intercepted before they took place
2	Mandatory sentences for elephant / rhino poachers or dealers are 9 years for first offence and 11 years on second

3	This is actual patrolling effort expressed in patrol man-days carried out per year (not total staff x 365 days)
4	This is the average number of men (including deployments from other areas) in the field at any one time
5	Each vehicle available for law enforcement operations should be multiplied by the number of months it was available for field operations
6	e.g. if only three-quarters of the area has VHF radio reception then this figure will be 75
7	e.g. if the VHF radio system was only functional for 3 months of the year then this figure would be 25
8	Refers to the number of times the local community (not paid informers) volunteered information on actual or potential incursions of elephant/rhino poachers, and/or freely provided information/help leading to interception/ arrests
9	Refers to infringements of the regulations by safari operators/hunters/guides (e.g. shooting under age trophies, exceeding quotas, transfers of quotas from other areas, hunting from vehicles, etc.

Annex VIII – Comments received during document review

A small number of comments were received during the review of the summary report that represented new thoughts or ideas that had not been raised during the workshop. As this report represents a summary of the discussions of the workshop, these points have not been integrated into the above report. However, they are summarized below.

It was suggested that it may be helpful to have a facilitated workshop that would bring together all Area Managers across the country to share ideas, and discuss their challenges and successes.

While trophy hunting is not a management option in Mana Pools National Park, it was suggested that the Safari Operators Association of Zimbabwe (SOAZ) was an important stakeholder, particularly in collaboration with neighbouring Safari Areas, and that there could be significant scope for complementary action and collaboration with the safari operators in the Lower Zambezi Valley. This could include enhancement of communication, periodic meetings, and adjustments to concession agreements.

Comments on the draft summary report were received from

- S. Chibaya
- T. Chipere
- J. Gutu
- C. Jones
- R. Maasdorp
- R. Miliyasi
- L. Muller
- M. Pani
- J. Stander
- L. Taylor
- C. van der Riet

Subject: Zimbabwe Suspension
From: "John J. Jackson, III" <cf@conservationforce.org>
Date: 5/5/2015 8:21 AM
To: Tim Vannorman <Tim_Vannorman@fws.gov>, Bryan Arroyo - FWS <bryan_arroyo@fws.gov>, Dan Ashe <dan_ashe@fws.gov>, Rosemarie Gnam <Rosemarie_Gnam@fws.gov>
BCC: Edson Chidziya <wsithole@zimparks.co.zw>, Edson Chidziya <eceddiepasi@gmail.com>, Olivia Mufute <omufute@zimparks.co.zw>, Oliviamufute@yahoo.com, CAMPFIRE - Charles Jonga <cjonga@campfirezimbabwe.org>, Regina Lennox <regina.lennox@conservationforce.org>, Marco Pani <pani.marco@gmail.com>, David Cumming <cummingdhm@gmail.com>, Chris Hudson <chris-hudson@att.net>, Ben Carter <ben@biggame.org>, Karl Evans <mk_evans@yahoo.com>, John Thodos <johnthodos@gmail.com>, bill brewster <bbrewster@caphillgrp.com>, Ralph Cunningham <ralphscunn@aol.com>, Mike Branham <mwbranham@gmail.com>, Lori Clem <Lori@toothacres.com>, Alan Sackman <a.sackman@sackman.com>, James Mitchell <jamesfrancis7277@aol.com>, Wes Bates <wcbates@steemer.com>, Louis Muller <louis@pro-saf.com>, Thys De Vries <lde@netconnect.co.zw>, Rowan Martin <mockingchatzim@gmail.com>

FYI - Please note the attached report that clearly demonstrates the long-term reason for elephant decline in the related area that has not been caused by mismanagement or lack of effort. An extended suspension of imports will worsen the situation, reduce the value of those elephant and hasten the decline. Thank you for your attention.

--
John J. Jackson, III
CONSERVATION FORCE
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Attachments:

Cumming & Lynam (1997) Zambezi Valley Study - Summary & contents.pdf	5.1 MB
Attached Message Part	3.1 KB

WWF - WORLD WIDE FUND FOR NATURE

Landuse Changes, Wildlife Conservation and Utilisation, and the Sustainability of Agro-ecosystems in the Zambezi Valley

FINAL TECHNICAL REPORT - Volume 1

D. H. M. Cumming and T. J. P. Lynam

August, 1997

European Union Contract B7-5040/93/06

WWF Project No. ZW0024

WWF Programme Office
P O Box CY1409
Causeway, Harare
Zimbabwe

Landuse Changes, Wildlife Conservation and Utilisation, and the Sustainability of Agro-ecosystems in the Zambezi Valley

SUMMARY

Introduction.

The Zambezi Valley below the Victoria Falls is an ancient landscape which has changed little in the last two to three million years. For much of the last 35,000 years it was inhabited by stone age hunter-gatherers and only more recently by cultivators. Intensive settlement and agricultural development of the mid-Zambezi Valley is less than 50 years old. Development has followed the eradication of tsetse flies and the associated provision of access roads and infrastructure. High rates of immigration into the Valley have also been influenced by rapidly growing human populations and overcrowding in communal farming lands elsewhere in the country. Macro-economic factors affecting labour and industrial development in Zimbabwe have also played a role.

The aims of this study were: (¥) to describe changes in patterns of settlement over the last four decades and examine associated changes in wildlife and livestock distribution over the last decade and a half; (ii) to examine how households used natural resources and designed their agricultural systems to meet their needs, and (iii) to attempt to synthesize these two lines of investigation into a predictive understanding of how land use systems in the Valley may, or may not, meet human needs under various bio-physical and socio-economic conditions in the future. We were concerned not only to describe landuse changes and practice but to try and elucidate the processes involved. The study was thus conducted at two scales. At a macro scale (1:250,000) using aerial photography and aerial censuses we examined changes in the distribution of human settlement (from 1951-1993) and livestock and wildlife (from 1980-1995) over the entire study area. At a smaller, meso-scale (1:50,000) we examined household use of natural resources and agro-ecosystem processes in five wards distributed though the study area. Spatial analysis using GIS was not envisaged in the initial project design but it soon became clear that it was necessary. The resources for developing a GIS capacity were provided by WWF=s Multispecies Animal Production Systems Project (ZW0007) from January 1994 to September, 1996.

The study was carried out in two areas of the mid-Zambezi Valley. The Sebungwe region which covered 16,000 km^2 to the south of Lake Kariba and the Dande/Chiswiti area of 8,000 km^2 below the Zambezi escarpment in the north east (**Fig. 1**).

This report is divided into three sections which conform to the aims of the study, namely, changes in human settlement, wildlife and livestock at a macro-scale; meso-scale analyses of household natural resource use and agro-ecosystem sustainability and finally a section which integrates these two scales of analysis.

Changes in human settlement, wildlife and livestock

Aerial photography at a scale of 1:25,000 to cover both study areas was commissioned in June 1993 and successfully completed by early 1994. This has been the only aerial photographic coverage at this scale of the two study areas in the last decade. The photography is available to other agencies at the cost of the prints. We attempted to develop techniques to use scanned aerial photographic images to determine areas of settled and cultivated land. This approach was eventually abandoned in favour of using UTM grid overlays (500m x 500m or 0.25 km^2) directly on the 1:25,000 scale photographs and then transferring the recorded occupance scores for each grid square to a GIS database. For the Sebungwe region we used six sets of photographic coverage, namely, 1951, 1959, 1964, 1973, 1981 and 1993. For Dande/Chiswiti the early photographic coverage (1951 and 1955) was incomplete and we also used coverages for 1959, 1961 & 1966, 1973, 1981 and 1993. In both study areas only the 1973, 1981 and 1993 photographic coverages were complete. In all we extracted data by 0.25 km^2 from some 15,000 aerial photographs.

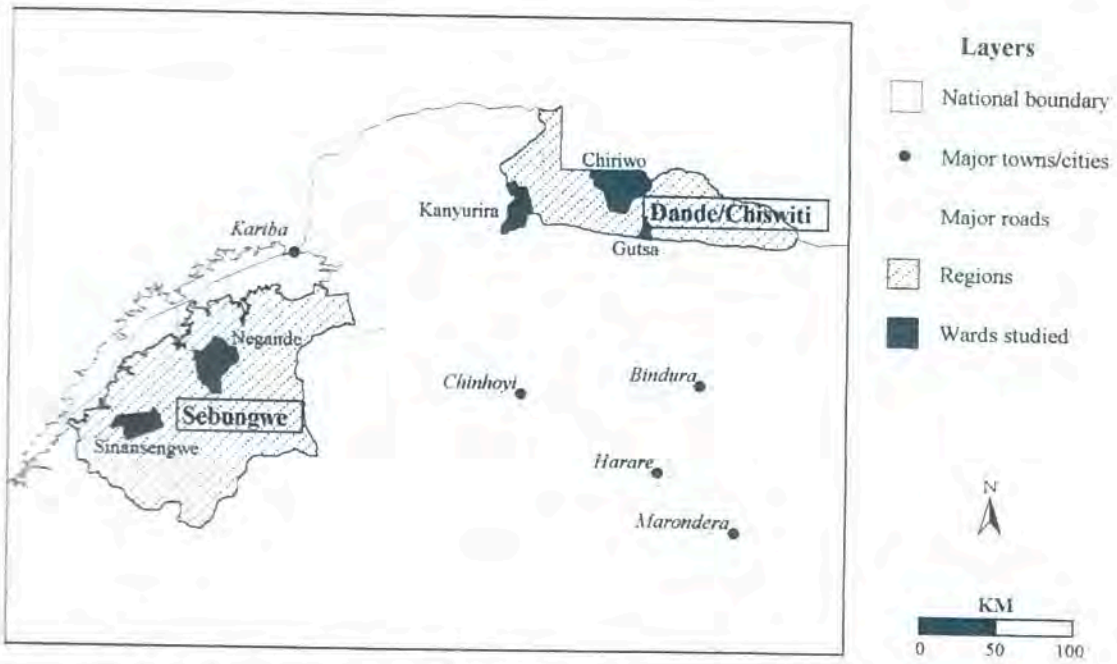

Fig. 1. Map of northern Zimbabwe showing study areas in the mid-Zambezi Valley

An aerial census of wildlife and livestock covering both study areas and funded by this project was carried out during August to October, 1993. Aerial census data for the period 1980 to 1995 have been collated and entered into our data base which, in addition to population estimates and densities, provides the location and number by species for each animal or group of animals sighted on the surveys. The data base contains over 7,000 records covering >10 wild species as well as cattle donkeys goats and sheep.

Human Settlement

Analysis of the changing patterns of settlement indicates that land was being cleared for settlement and cultivation at variable rates over the last 40 years. In the Sebungwe there were two peaks in the rate of land clearance. The first, at 10% per annum, occurred between 1959 and 1964 which coincided with the filling of Lake Kariba and the onset of infrastructural development for tsetse control. The second peak occurred during the period 1981 to 1993 when cleared land increased at the rate of 8 % per annum. The rate at which settlement expanded in the region between 1951 and 1993 averaged nearly 5 % per annum. Analysis of rates of change in the Dande/Chiswiti area before 1973 was complicated by gaps in the aerial photographic coverage. Between 1973 and 1981 there was an exodus of people due to the liberation war which was reflected in a slight decline in the area settled. However, between 1981 and 1993 land clearance occurred an a rate of 9% per annum. This influx of people to the Dande/Chiswiti area coincided with the mid-Zambezi Valley Resettlement scheme and active government promotion of resettlement in the Valley. Broad patterns of change in human settlement in the Sebungwe and the Dande/Chiswiti regions over the 20 year period between 1973 and 1993 are graphically illustrated in **Fig. 2.** Intensive settlement on river systems is particularly apparent and, apart from its direct environmental impacts, it effectively excludes wildlife from key dry season riparian habitats and water. This in turn reduces wildlife populations and the effective use, by wildlife, of large blocks of unsettled and agriculturally unsuitable habitat away from the rivers.

The total areas cleared for villages and cultivation are still low relative to the overall land area and in 1993 stood at 12.4% of the communal land in the Sebungwe study area and 9.2% of the Dande/Chiswiti area. However, cultivation of close to 10% of the overall land area, where arable soils generally cover less than 5%, suggests that cultivation has already extended into marginal soils and terrain. Goals for sustainable forms of rural development and conservation are unlikely to be realised under existing trends let alone under conditions of further population growth and immigration. The sustainability issue is examined at greater depth in the meso-scale, ward level studies below.

Wildlife and Livestock

In the Sebungwe, as expected, the highest wildlife densities were found in the protected areas which cover 6,441 km^2 , or 32% of the 16,450 km^2 study area. The elephant population in the Sebungwe increased from 9,750 in the early 1980's to approximately 11,600 in the mid 1990s. Elephant dry season range declined by about 15%. The area most affected was in the south east of the region **(Fig. 3)**. The buffalo population increased over the same period from 12,600 to 20,400 but also showed a reduction in range. The black rhino population collapsed after the poaching onslaught in 1990-91 from over 500 rhinos in 1989 to less than 35 in 1993 of which 25 were confined to the Matusadona National Park. Livestock, particularly cattle, increased from 3,700 in 1983 more than 45,000 in 1996 with their range extending **(Fig. 3)** as tsetse flies were eradicated. Goats and donkeys also increased in number and distribution between 1983 and 1995. Livestock numbers were probably much higher than indicated here because our morning censuses started before many villagers released livestock from their pens.

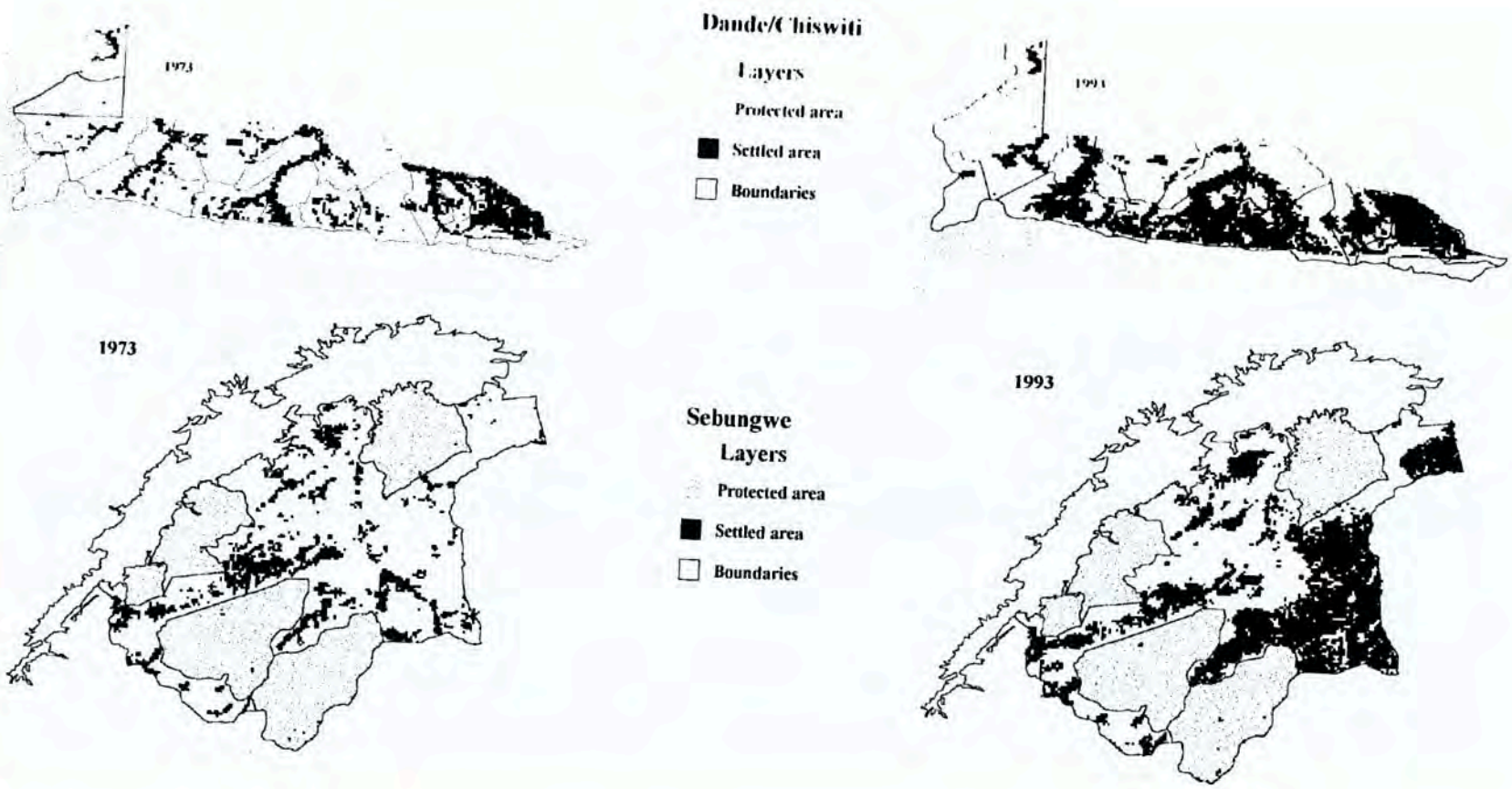

Fig. 2. Changes in human settlement patterns between 1973 and 1993

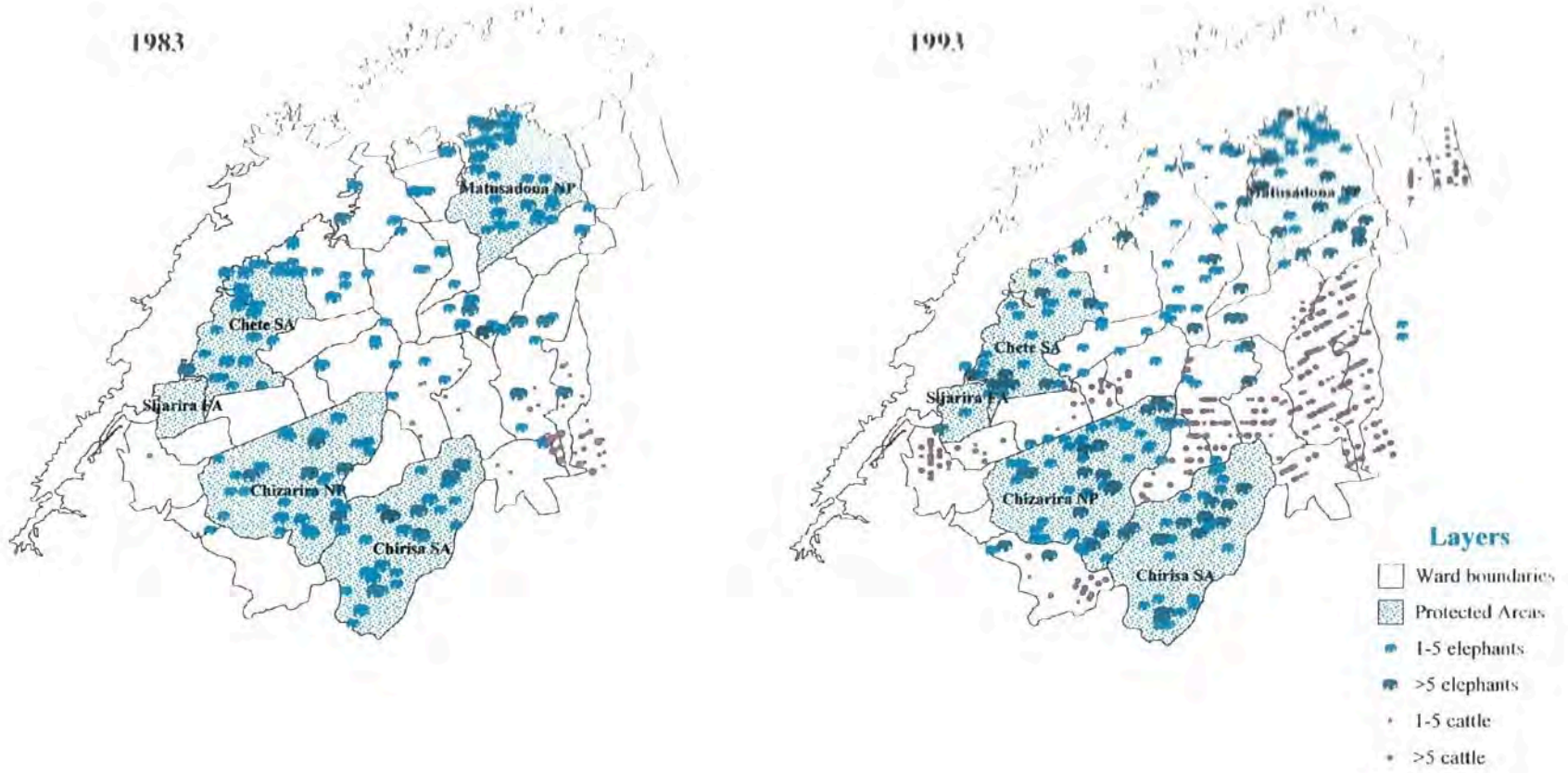

Fig. 3. Changes is distribution of Elephants and Cattle in the Sebungwe between 1983 and 1993

In the Dande/Chiswiti area elephant numbers showed little change over the period 1980 to 1995. Buffalo declined and black rhino were eliminated. Livestock numbers escalated, particularly in the eastern part of the study area - again in response to immigration and the control of tsetse flies.

Macro-scale trends, Conservation and Sustainable use of wildlife.

Human population growth and immigration, continuing land clearance and increasing livestock populations in the Zambezi Valley have already greatly reduced the potential for multispecies systems of animal production. Wildlife as a land use option has been curtailed over the last decade and, in the Sebungwe, the corridors of wildland between existing protected areas are in danger of disappearing. While elephant and buffalo populations have increased overall the reduction of their range and higher densities within protected areas has consequences for conservation within the protected areas of the mid-Zambezi Valley. Elephant densities within protected areas have exceeded densities of 1 km^{-2} for the last 15 years and large areas of woodlands (e.g. 85% of miombo woodlands) have been reduced to scrub and grasslands with marked impacts on the biodiversity of other groups of animals. In both the Sebungwe and the Dande/Chiswiti areas there has been a marked decline of rare but valuable antelope such as sable, roan, tsessebe and eland, both within and outside protected areas. The impacts on biodiversity of habitat fragmentation through land clearance outside protected areas has still be critically measured.

Elephant and buffalo populations are still high in the region and provide the major source of revenue to Rural District Councils (and indirectly to households) from safari hunting licence fees and concessions. However, the larger areas of wildland needed for such ecotourism ventures are becoming increasingly fragmented and confined as land clearance proceeds. The thresholds of human population density at which large mammals such as elephant and buffalo are reduced to very low or non-existent populations are rapidly approaching over much of the area (**Fig. 2**). The loss of wildland and of key large mammals has long term implications for the conservation of biodiversity in these areas and the region. The erection of fences to contain elephants and control animal diseases further exacerbates the problem.

A continuation of the macro-level trends described here for a further decade will almost certainly compromise the survival of viable populations of large wild herbivores outside protected areas and reduce biodiversity within the mid-Zambezi Valley. The sustainability of the Communal Areas Management Programme for Indigenous Resources (CAMPFIRE) and associated eco-tourism ventures in the area will also be compromised. The sustainability of agro-ecosystems under current policy and practice and under higher human population densities are covered below.

Household natural resource use and agro-ecosystem sustainability

Mid-Zambezi Valley agro-ecosystems are complex. Multiple actors seek to satisfy multiple objectives in a politically, economically and bio-physically very variable environment. In a single agricultural season it was not feasible to take sufficient measurements, even when limited to the five wards on which we focused (**Fig. 1**), to develop a predictive understanding of the major processes that gave rise to the agro-ecosystems we observed. Instead we enlisted the help of the people who know best how these systems are structured, how they work and how they are likely to change. Many of these experts were Zimbabwean scientists but most were village people (Village Representatives) elected by the communities in which we worked. We asked the scientists to take measurements that

would inform us about the state of resources in each of the five study wards and we asked them to measure how these resources change with use. Working in intensive workshops the Village Representative groups provided a window onto the world of mid-Zambezi Valley households through which we were able to explore, in great detail, the structure and functioning of these agro-ecosystems.

To explore the spatial and temporal detail of their economies 110 households were monitored each week for between nine and eleven months. To index our detailed investigations of the 110 households we also interviewed 1,088 heads of household. Information on the structure, activities, perceptions and values, and production of each household was obtained. The 110 households were randomly selected from six classes of household development stage and two classes of wealth. A semi-structured data collection process was designed and used to gather information on what was done, by whom, where, when and with what results. This information was checked, calibrated and entered into a digital database to provide the information source for the analysis of household economies. The family labour database, for example, contains over 23,000 records of activities carried out in fields, woodlands, at the homestead, in riverine gardens or with the household livestock. Well over 5,500 maps showing household activities in community woodlands were digitised and linked to the attribute databases.

From this wealth of information and knowledge we have tested our understanding of these complex agro-ecosystems. In the next section we summarise our findings on the contributions natural resources make to household economies. Thereafter we discuss the sustainability of mid-Zambezi Valley agro-ecosystems in the light of our research findings.

Household economies in Communal Area agro-ecosystems of the mid-Zambezi Valley.

Village representatives ranked *land, water, food, cash, livestock or draft, knowledge or education, equipment, community and leadership, clothing and bedding and health* as the ten most important groups of needs necessary to lead an acceptable life. That these needs include factors of production (land, water, livestock and equipment), social goods and services (community, leadership and health) as well as consumable commodities has been neglected in previous studies and their inclusion as household objectives has important implications for assessing the sustainability of landuse systems.

Our analyses provide the following broad assessment of household needs in the mid-Zambezi Valley:

Land. Total areas of land required to satisfy basic household needs using current technology were estimated as being **45 to 50 ha**. This included 5 to 14 ha arable for rainfed crop production, 7 to 9 ha woodland for timber and fuel wood and 28 ha grazing land for a herd of 11 cattle and 10 goats.

Water. An average household (5.5 members) was estimated to require about **80,000** litres of water per year for household use with about half this amount being potable. This amount excluded that required for agricultural production and for livestock.

Food, cash and other basic household needs. The annual cash needs to satisfy basic household requirements for food, clothing, bedding, education, household utensils, leisure and entertainment were between **Z$6,000 and Z$16,000** per household. With increased integration into the broader economy household needs increased. These basic needs levels were equivalent to the total annual salaries of between 2 and 5 full time farm employees in the commercial agricultural sector.

Activities households engaged in to achieve these needs. Households engaged in a range of production and harvesting activities in order to achieve their needs. All households used or sold **natural resources; 97%** of households engaged in **rainfed crop production** activities, **93%** kept or produced **livestock** (including fowls); **59%** had **irrigated vegetable gardens**; **36%** received **remittances** from wage earning family members and about **34%** produced or sold **craft goods** of some sort. On average about 35% of recorded household **cash income** was generated from crop sales, 24% from wage earnings, 14% from livestock sales, 12% from craft sales, 11% from remittances, 9% from beer sales, 4% from wildlife dividends, and 3% from vegetable sales. Natural resources were important inputs to all of these activities with the possible exception of wage earnings and remittances. Virtually all nutrients used in crop and vegetable production were derived from soil stocks; all livestock feeds, most materials used in craft production and the fuel wood used in beer production were derived from woodland resources. Wildlife dividends were derived, via the District Council, from hunting concessions leased to commercial safari operators. **Natural resources** were therefore, **the major material input** to the generation of household **cash income**.

Using median yields for maize, cotton and sorghum, as well as current areas of cultivation and livestock offtake rates, households in Kanyurira, Chiriwo and Gutsa could only just satisfy the most basic requirements if it was assumed that **they grew cotton**. Without growing cotton households would not be able to satisfy their basic food and cash needs from rainfed agriculture and livestock production. Only 43% of surveyed households grew cotton suggesting a high proportion were not satisfying their basic needs. In the Wards with lower production potential (Negande and Sinansengwe) few households were likely to be able to satisfy their basic needs using current crop and livestock technologies. These results suggest it was unlikely that investment in production, and hence that population induced development, would occur.

Relative contributions of Natural Resources to household economies.

Cash incomes formed only a part of the total household economy. Many activities involved resources for which there were no market prices. We therefore, used *labour time* as a common currency and multiplied median time spent on each activity by the local wage rate for each activity to estimate the price of goods and services consumed.

Of the expenditure so estimated **35%** was allocated to the collection and use of **natural resources**, **33%** to the management of **animals**, **24%** to **field crops**, **7%** to the **home** and about **1%** was allocated to vegetable gardens. **Natural resources** also contributed to the production of the goods and services derived from animals, from field crops and from vegetable gardens. Households used natural resources from areas of between **6 and 17 km^2**. As a conservative estimate, **natural resources** account for **well over one third of the value added in the economy** of households in the Zambezi Valley. This value is a conservative estimate as households do not, in general, pay the full costs of their use of natural resources. The direct contributions of natural resources to household economies was greatest in female headed households and in the early stages of household development.

Sustainability of land use practices in mid-Zambezi Valley agro-ecosystems.

The sustainability of land uses and agro-ecosystems depends on their political and social acceptability, on their economic and financial viability, on the nature and use of their bio-physical resources and on the behaviour of the political, socio-economic and bio-physical systems with which they are strongly coupled.

Social sustainability.

Land plays an extremely important cultural as well as economic role in mid-Zambezi Valley communities and was identified as the most important household need in all study sites. Communal Area households need land in the same way urban dwellers need education; it provides them with the basic tool to ensure their livelihood. Obviously the land resource is finite. Whilst education could provide a substitute where the economy provides secure employment opportunities, historically this has not been the case nor do we see much chance of this changing over the next decade. Demand for the finite land resource as a means of ensuring household livelihoods is likely therefore, to intensify. Satisfaction of this demand is not sustainable.

Population growth in the five wards examined was daunting; from 1969 to 1992 the populations in these wards grew by between 3.8 % in Sinansengwe to 25.4% in Gutsa. There is little to suggest that these high growth rates will be curtailed in the near future. The most pessimistic of AIDS related mortality predictions suggests a zero population growth over the next two decades whilst more conservative scenarios suggest a 1 to 2% population growth rate for Zimbabwe as a whole. The population of humans that mid-Zambezi Valley agro-ecosystems are expected to support is growing at an alarming rate. Without significant changes in technology or large increases in the demand for labour in the formal or informal sectors of the economy these population pressures are likely to negatively impact mid-Zambezi Valley agro-ecosystems. Employment in the agricultural, manufacturing and mining sectors has been declining over the past several years and the formal sector is unable to absorb the surplus labour from Zimbabwe=s Communal Areas. Establishment of small scale informal businesses requires capital and access to markets. The low levels of production achieved in three of the five wards investigated suggest little capital (including human capital) is being accumulated and the poor infrastructure and distance to markets add greatly to the transaction costs of producers. High population growth rates have the potential to completely undermine the sustainability of mid-Zambezi Valley agro-ecosystems.

Political sustainability.

Land use activities that are not politically acceptable are unlikely to be sustainable. Wildlife as a land use option has only recently become politically acceptable in some mid- Zambezi Valley communities and its acceptance is not yet assured. Village Representatives in Negande, for example, informed us that wildlife was not a generally accepted land use and that there were considerable pressures on local leaders and political institutions to open wildlife areas to cultivators. Pressures to forego the wildlife option tend to be greatest from immigrants. Agriculture, on the other hand, was a generally accepted form of land use with a broad base of local and national political support. Wildlife as a land use option does not yet enjoy the local, or national, political support that agriculture does. With the uncertain property rights governing natural resource use in the Communal Areas, wildlife and natural resource use are very vulnerable to variation in local and national political attitudes.

Economic sustainability.

Households living in mid-Zambezi Valley agro-ecosystems rely heavily on natural capital to ensure their livelihoods. The *full costs of natural resource use* are not however, being carried by the direct users of these resources. Preliminary investigations suggest, for example, that cattle may be only marginally economic when the full opportunity costs of the resources are included in the calculations. The value of nutrient subsidy to household cropping systems from soil reserves was estimated at about Z$100 per year. The common property tenure regimes prevalent in the mid-Zambezi Valley communities means that market prices probably will not efficiently allocate resources. This could make natural resource use unsustainable unless other allocative institutions are developed. One of the most important contributions of the CAMPFIRE programme has been the development of **new institutions** for the allocation and control of natural resources. Faced with rapidly growing demands for the goods and services provided by natural resources and central government=s ambiguity with regard to traditional structures, these embryonic institutions may be key determinants of sustainable natural resource use and hence the sustainability of agro-ecosystems.

The financial and economic returns to land and to labour in rainfed crop production are an order of magnitude higher, per ha of arable soils, than those arising from other uses of the land and labour in Zambezi Valley agro-ecosystems[1]. The demands for arable land and the desire to cultivate the land is entirely rational and understandable. Despite these high returns the high population growth rates coupled with limited arable land and the generally poor productive performance of current crop technologies means that rainfed crop production is unlikely to sustain future populations. The returns to land and labour in livestock production, with current technology, is much lower than that from crop production and is unlikely to provide an alternative that will sustain future livelihoods. Harvests of wildlife and other natural resources also do not provide a means of sustaining future populations.

Bio-physical sustainability.

By 1993 all arable land had been allocated in Gutsa, Sinansengwe and Negande wards. With current technologies and prices rainfed agricultural production is therefore unlikely to be a sustainable means of supporting future human populations in these areas. Only Chiriwo and Kanyurira had arable land areas sufficient to meet the needs of limited future population growth. Areas of irrigable land in the study sites were small and irrigated agricultural production was unlikely to make a notable contribution to household needs satisfaction and future development. Preliminary investigation of the effects of irrigated cultivation on some mid-Zambezi Valley soils indicates that irrigation will need high levels of management to be sustainable.

[1]/ But note that riparian areas are also key areas for wildlife and the opportunity costs of cultivating these areas as opposed to using them to sustain wildlife over a much larger landscape needs to be examined - particularly at low human population densities.

Continuous cultivation of mid-Zambezi Valley soils (we examined 10 different soils cultivated for over 10 years) had several detrimental effects; soil organic carbon was reduced by about 19%, soil erodibility was increased by 2 to 5%, the time to run off for wet soils was reduced by 2% and the proportion of stable soils aggregates decreased by 31%. These factors have important implications for the sustainability of agriculture and for the environment, particularly when coupled to larger scale processes. Reduction in soil organic carbon contributes to reducing soil structural stability as well as the nutrient and water retention capacities of the soil. Water use and nutrient use are therefore, likely to be less efficient. In these water constrained environments the loss in efficiency with regard to water use, the reduced infiltration of water as a result of the loss of soil stability and the reduced time it takes for water to begin running off wet soils are likely to have a major impact on the economic and environmental sustainability of dry land agriculture. Increased soil erodibility when coupled with the extension of land use under increased human populations could add greatly to the removal of productive soils and nutrients and their redistribution over the landscape, their discharge into river systems, or both.

Investigations on the impacts of timber harvesting patterns on the woodland resource indicated that current patterns of use led to changes in the structure of woodlands with increasing numbers of small and fewer medium to large trees. At current levels of use woodland resources (poles and fuel wood) are not constraining. Kanyurira, Negande and Sinansengwe households all had sufficient areas of woodland within about 3 km of the household. In Gutsa, where the population density was the highest at about 19 people km^{-1}, households would need to venture almost six kilometres to access the required 7.5 ha of woodland. Good quality timber and graze resources are likely to become constraining in all sites within the next few decades if current population growth rates are maintained.

The well being of households in mid-Zambezi Valley agro-ecosystems is tightly coupled to the river systems which generally arise on the plateau and drop into the valley towards the Zambezi. Most people live, and most activities occur, within **5 km** of main rivers. Rivers are the arteries of life providing water for humans, livestock and vegetable gardens; alluvial soils for cultivation; water for wildlife and riverine tree species; fish for food and for sale. The people of the valley do not however, currently have a say in the allocation or use of water upstream of their wards (although the new Water Act should change this). The people and their agro-ecosystems are critically vulnerable to upper catchment water and land use. Changes in the flow of water from above the escarpment could completely undermine the sustainability of Zambezi Valley agro-ecosystems and severely reduce available land use options.

WWF=s study on climate change in Southern Africa indicates higher temperatures and evaporation in the Zambezi Valley areas in the future. There is, however, great uncertainty with regard to changes in rainfall. The core scenarios suggest changes will be slight. If higher temperatures prevail without an increase in rainfall, reduced production from the land will ensue.

Land use, conservation and future livelihoods

Current trends in population growth, resettlement and land clearance within the Zambezi Valley show little sign of abating. Our results indicate, quite convincingly, that current land use systems, are unlikely to be socially, economically, politically or bio-physically sustainable. A dual land use system of communal farming land (57%) and protected areas (43%), is becoming more sharply defined. In the communal lands the diversity of production and harvesting systems is being

threatened by the burgeoning demands of rapidly growing rural populations. Land based production alone can scarcely support existing populations, let alone expected future growth, and the national economic environment provides few alternatives. The rights of peasant farmers in natural resource management and harvesting are still rudimentary and insecure. Centralised, prescriptive and often *ad hoc* planning has in some cases led to the repeated resettlement of the same communities in different areas while in others it has fostered uncontrolled immigration and haphazard settlement on marginal lands. In protected areas ecological resilience and biodiversity conservation are being threatened by an excess of elephants, inappropriate fire management and low levels of protection from poaching. At the same time the cultural and economic relevance of protected areas to the people of the Valley is being undermined by a lack of meaningful investment and by the self serving policies of a centralised, national administration.

Options and Opportunities.

An extension of current trends is clearly not a desirable option and it is important that we recognise successes and build on them, for not everywhere in the valley does the future look bleak. Among our study sites Gutsa and Kanyurira Wards stand out as exceptions. Kanyurira has a low population density, bountiful wildlife and natural resources which meet a high proportion (up to 90%) of household needs and, with a strong institutional framework enhanced by the CAMPFIRE programme, the community=s future is bright. Gutsa, despite its relatively high population densities, has very high education levels and high agricultural potential and good roads which brings it far nearer the markets of the plateau than most mid-Zambezi Valley communities. Diversification into multiple economic activities is already evident and their future looks positive. Both communities provide pointers to the future. Kanyurira highlights the benefits of sensible land use planning which combines agriculture with *high value wildlife production and tourism,* Gutsa, the potential to diversify and enhance economic production options by *maximising the value added* ***in situ***.

Wildlife and Tourism Development.

The mid-Zambezi Valley=s comparative advantage lies in its wildlife and scenery and in developing higher valued production options, particularly those based on tourism. This is the fastest growing sector of the national (world ?) economy at 8% pa. It has major multiplier effects on employment and markets and can combine the generation of wealth with benign use of the resource base. Realisation of the full potential of the wildlife industry in the mid-Zambezi Valley requires enabling policy and legislation which involves households in resource management and brings them tangible benefits. Without such involvement and benefits wildland will continue to be settled and a promising sustainable development opportunity will be lost. The Omay Communal Land around Matusadona National Park provides a clear example of present and potential incentives - gross ecotourism and wildlife values are of the order of US $8 million per annum, or more than US$ 1,000 per household, but returns of US$ 20 or less per household from wildlife and tourism based revenue are the norm. Economic links between protected areas and surrounding communal lands in the mid-Zambezi Valley are presently weak but could be developed through appropriate joint ventures and leasing arrangements. Protected areas could form the centre piece of the mid-Zambezi Valley rural economy rather than remain ecologically, economically and culturally isolated islands.

Diversity of Production and Enterprise Development.

The seeds of a diverse and appropriate technology and enterprise development already exist: exploitation of *musawu* (a wild fruit) is already happening on a large scale; small scale livestock enterprises based on ostrich, fish or crocodiles are being developed elsewhere; the expected growth in the tourism industry provides ready opportunities for the supply of horticultural and craft products; the valuable timber resources in the valley as well as local bamboo species provide opportunities for export orientated furniture and craft production. The first steps in institutional development have already been taken; existing legislation and CAMPFIRE institutions have partially empowered several mid-Zambezi Valley communities; local, national and international markets exist and await development. It is clear that the viability of many of these options depends on the *concomitant development of political and economic institutions as well as human resources, technologies and infrastructure.*

Investment in human resources.

Large investments in the development of human resources, education and training are an essential pre-requisite both to slowing population growth and to the development and implementation of new technologies. Investment is also required in the development of institutions, both economic and political, that are able to exploit the opportunities that capital investment brings. If we assume that common property regimes will persist in the valley then innovative institutions need to be explored that will facilitate the efficient and equitable generation of wealth. Quite clearly the success of these initiatives is dependent on the legislative environment. A clear commitment from central and local government to facilitate and promote innovation will be essential.

Local Resource Management and Landuse Planning culture.

Key to the efficient use of land based resources is the ability of local farmers and communities to make their own choices and trade offs without imposed taxes and distorted values on their natural resources. The empowerment of farmers and local communities with the tools for landuse planning and natural resource management as an ongoing process, rather than as a periodic, top-down exercise, is vital [2/]. The Amanagement by committee@ model common in CAMPFIRE communities may not be adequate as these communities seek to take advantage of opportunities that arise. Alternative management institutions need to be explored with management consultants rather than with development scientists. The legislation enabling local communities to use their resources to earn incomes, to raise loans and to invest in their futures needs to be reviewed and strengthened. It is vital that central and local governments support these processes.

[2/]WWF Resource Management Support to Campfire Project (ZW0022) has been working with communities in the mid-Zambezi Valley to develop participatory landuse and resource management approaches which can be used at a local level and working towards developing expert systems and decision support tools to assist communities.

Sustaining the resilience and integrity of the mid-Zambezi Valley requires above all a recognition that:

a) current practice and trends in landuse and development will not meet peoples needs;

b) appropriate institutions, markets and technologies that foster sustainable landuse and enterprise development must be developed, and,

c) these institutions, markets and technologies must be adapted to the variable environments of the mid-Zambezi Valley.

The comparative advantage of the mid-Zambezi Valley lies in its wildlife resources and biodiversity and the existing extensive protected area system needs to be a central component of the development process.

NOTE:

This report was prepared by Dr. D H M Cumming (Project Executant and Head of WWF=s Programme in Zimbabwe) and Dr. T J L Lynam (Senior Research Fellow and Agro-ecosystem Specialist. Many people contributed to the project and to all of them we are extremely grateful. Those who have been involved, both in the project and in the final production of this report, are acknowledged in the main report and also indicated in the authorship to Annexes and elsewhere when appropriate.

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6.1.1 Derman, B. (1996) Changing landuse in the eastern Zambezi Valley: socio-economic considerations. CASS/WWF Joint Paper. Harare.

6.1.2 Lynam, T. and Gambiza, J. (1996) Zimbabwe=s Communal Areas heading towards the future: Crisis management or purposeful adaptation ? pp78-84, In: Odada, E., Totola, O. Stafford-Smith, M. and Ingram, J (eds.) *Global Change and Subsistence Rangeland in Southern Africa: the impacts of climate variability and resources on rural households.* GCTE Working Document No. **20**, GCTE Core Project Office, Canberra, Australia, 99pp.

6.1.3 Lynam, T. J. P., *et al* (1996) Assessing the contribution of renewable natural resources to the livelihoods of Communal Area households in the Zambezi Valley.

TERMS OF REFERENCE:

Land use changes, wildlife conservation and utilisation and the sustainability of agro-pastoral systems in the Zambezi valley.

I (a) OBJECTIVES

In examining whether land use options and wildlife utilisation in the Zambezi Valley are sustainable, this study will provide sound baseline information on trends in land use, in wildlife and livestock populations and current data on agro-economics particularly in relation to wildlife utilisation. The results of this study will be used to analyse current and potential agro-ecosystem designs which might include wildlife and their long term sustainability in the Zambezi valley. The study will focus on two areas of the Zambezi valley which have faced rapid increases in human population and changes in land use over the last three decades. The changes have followed the filling of Lake Kariba in 1960 and the eradication of tsetse flies over much of the area during the last decade. The two areas are the Sebungwe area lying to the south of Lake Kariba and the Dande/Muzarabani/Chiswiti Communal land in the Guruve, Centenary and Darwin Districts.

The main components of the study will include :

1) the changing patterns of land use in the two study areas between 1958 and 1993;

2) changes in wildlife and livestock populations in the two study areas between 1980 and 1993;

3) a 12 month economic survey of selected households in the communal land farming systems in the two study areas. The survey will focus on the contributions of wildlife, other natural resources and agriculture to the economies of selected households through the annual cycle.

4) analysis of whether agro-ecosystems, which may or may not include wildlife, in the two study areas are able to continuously (sustainably) meet the needs of their inhabitants.

The four project components also contribute to a five year study on multispecies animal production systems being undertaken by the WWF Multispecies Project.

I (b) METHODS AND MEANS

Aerial photographic surveys of changing patterns of land use

This will be examined by analysing existing and new aerial photography of the study areas. Aerial photographic coverage of the Sebungwe area is available at scales of between 1:25,000 and 1:80,000 from 1951 to 1985. It is available for part of the study area (Kariba and Dande) for 1990. In order to obtain up to date coverage of the entire Sebungwe study area and the Dande/Muzarabani/Chiswiti area it will be necessary to commission an aerial survey for May/June 1993. This aerial photographic survey will be done at a scale of 1:40,000 using panchromatic film. This would involve surveying approximately 25,000 km^2.

Aerial censuses of changes in wildlife and livestock populations

Aerial censuses of large wild mammals and livestock have been carried out in both study areas since 1980. These surveys were last carried out by the Multispecies Project in 1991 for the Omay and in 1990 for western Dande. Both need to be repeated in August/September 1992. This would involve approximately 75 hours of flying time in a Cessna 206 which will be hired locally. WWF already has the necessary navigation equipment and radar altimeter which can be fitted to the aircraft.

Year long survey of household economies.

The survey will be designed to provide information on the seasonal contribution of alternative land use options to income, employment and food security. This would include the collection of household data on crop yields, sales, own consumption, physical inputs and costs as well as, wildlife earnings, livestock sales, contribution to cropping activities and to household security. The actual and potential contribution of wildlife to income and employment would also be assessed. This study would require the appointment of two short term Research Fellows, one working in the Sebungwe and one in the Dande, and both of whom would be supervised by the WWF Multispecies Project staff.

Analysis of sustainability of agro-ecosystems

This component forms an extension of an existing research project within the WWF Multispecies Project. The current project is developing systems modeling techniques and Participatory Rural Appraisal (PRA) methods to examine communal land agro-ecosystems in the Zambezi valley. The methodology will provide a basis for analysing existing agro-ecosystems and for designing alternatives. It will also provide a basis for analysing the sustainability of agro-ecosystems in the valley. Up to ten study sites will be selected within the two project areas representing extremes and mid points of sustainable/ unsustainable agro-ecosystems.

Important determinants guiding site selection will be rainfall, soils and population density. Secondary data (rainfall, soils, maps, air photos etc.) will be collected and collated during June - September 1993, prior to the gathering of primary data in the field by Participatory Rural Appraisal (PRA) teams. These teams will include at least a Team Leader, Sociologist, Livestock Specialist, Agronomist and Economist. Field data collection by the PRA teams working with each communal farming community will include a needs analysis, system identification, problem formulation, abstract modeling (at a level and using techniques appropriate to the field and village situation), discussion and synthesis.

The field work sessions will each be followed by a two day expert workshop to examine field data and models and also by simulation modeling in the laboratory.

I (c) RESULTS

The results of the components of the project will be summarised in a Final Report which will address the project objective of examining sustainable land use options n the Zambezi Valley.

Specifically, the expected results for each component are as follows:

Changing patterns of land use

The proposed aerial photographic survey will produce a set of 1:40,000 aerial photographs of the two study areas. These will provide up to date baseline information on settlement patterns and land use and allow recent changes and developments in land use to be measured and catalogued. More specifically this component, using the long time series of available aerial photography, will provide data on the spatial and temporal changes in settlement, cultivation and deforestation in the study areas. It will also provide up to date information on the state of woodlands in National Parks areas in the Sebungwe which continue to be seriously damaged by high elephant densities.

Changes in wildlife and livestock populations

Up to date baseline data on numbers and distribution of major wildlife and livestock species will be produced. Trends in the numbers and distribution of the larger wild mammals and domestic livestock in the study areas over the last ten years will also be analysed and reviewed in the light of the updated census results. The links between settlement patterns and changing distributions and densities of wildlife will be elucidated by comparing results from this component of the project with those from the analysis of aerial photographs.

Year-long survey of household economies

Data collected from the household survey, combined with other available micro-economic data will provide a baseline report on the current contribution of cropping, livestock and wildlife to household income, employment, draught power and food security. It will also enable an estimate to be made of the potential contribution of these alternative land uses under various pricing, marketing, macro-economic and immigration scenarios. The economic and ecological tradeoffs and complementarities between these land uses will also be assessed. The economic data collected in the household survey and the economic analyses will contribute to the examination of agro-ecosystem sustainability and design. It will also provide invaluable baseline data for future work.

Sustainability of agro-ecosystems

After analysis of the sustainability of agro-ecosystems, the following concrete actions are foreseen :

- training in participatory rural appraisal (PRA)
- development of methods of agro-ecosystem appraisal
- models of Zambezi Valley agro-ecosystems
- identification of land use systems most likely to be sustainable in the Zambezi Valley.

I (c) RESOURCES

The following project staff, under the overall direction of the Project Leader, will be responsible for project implementation and supervision:

- Dr. D. H. M. Cumming (Project Leader)
- Dr. R. D. Taylor (Ecologist)
- Dr. D Jansen (Resource Economist) (*Replaced by Mr. I Bond -WWF Research Fellow*)
- Mr. T. J. Lynam (WWF Research Fellow)

The project will be supervised by Senior staff of the WWF Multispecies Project and Project resources in the form of vehicles, equipment and office facilities will be available

I (d) OPERATIONAL PROGRAMME AND TIMETABLE

As and when results of the various components are available these will be written up and distributed as project papers and submitted to the EEC delegation in Harare. Material from this project will be submitted to international scientific journals. Manuscripts prepared for publication will also be made available locally as Project Papers.

Implementation of the project components will be as follows:

Changing patterns of land use

The aerial photographic survey would need to be carried out in June -July 1993 with the photography being produced and ready for analysis by August 1993. Recruitment of research assistants to work on the basic examination and analysis of the photography under the supervision of Drs. Cumming and Taylor would take place in September 1993. Aerial photographic work should be complete by the end of January 1994.

Changes in wildlife and livestock populations

Aerial censuses of wildlife and livestock populations would be carried out during August and September, 1993 and analysis of the results would be completed by the end of November, 1993.

Year long survey of household economies

Two Research Fellows could be recruited by the beginning of June, 1993. An initial period of 3 months for literature review and developing survey instruments would be required and field work could begin in September, 1993. The field work would require logistical support in the form of vehicles (supplied by the MAPS project) and running and subsistence expenses. For each study area ten field enumerators would be required to cover a survey of up to 100 households over the period September, 1993 to August, 1994. A further three months would required to complete the analyses and write up by each Research Fellow.

Sustainability of agro-ecosystems

Preliminary work on the development of the methodology for Participatory Rural Appraisal of agro-ecosystems is well advanced and will be completed by May 1993. A Senior Research Fellow will be employed to conduct PRA during the 1993/94 cropping season. This would mean starting in October

1993 and completing the cycle PRA's and Workshops by March 1994. A further five months will be required for modeling and analysis with write up of the modeling component being completed by August 1993. The Senior Research Fellow would then contribute to the final synthesis during the last four months of the project.

Supervision and Synthesis

Senior staff of the WWF Multispecies Project would be involved in supervising and guiding all aspects of the project. They would also be directly involved some of the field work, in overseeing the collection and preliminary [analysis] of data both in the field and the laboratory. For the most part the collection of field data, data input and initial analysis of results will be nearly complete by August 1994. The major task of final write up and synthesis of the results from the four components will then be completed during the period August 1994 to November 1994.

1.2 Acknowledgments

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The project was supervised by Dr D H M Cumming (Project Exectutant and Head of WWF Programme Office in Zimbabwe) and Dr T J P Lynam (Senior Research Fellow and Agro-ecosystem Specialist) and the following participated in one or more of the necessary processes of data collection, analysis, writing, and criticism and advice, during the course of the project. Their contributions are indicated, where appropriate, in the particular chapters or appendices to the report:

Bond, I.	WWF Multispecies Project and WWF Support to Campfire Project (ZW0022)
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Chitsike, J.	WWF Zambezi Valley Project
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Cunliffe, R.	Consultant - Zambezi Valley Project
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Fortmann, L.	Technical advice
Frost, P.	Technical advice
Funkhouser, S.	Dept. of Forestry, Michigan State University
Gage, S.	Dept. of Entomology, Michigan State University
Gomez, S.	WWF Multipsecies Project
Gunda, W.	WWF Zambezi Valley Project
Henwood, D.	Maths Dept., University of Zimbabwe
Hodza, P.	WWF Multispecies Project
Howard, M.	WWF Multispecies Project
Hwenya, S.	WWF Zambezi Valley Project
Nkala, I	WWF Zambezi Valley Project
Kaitano, F.	WWF Multispecies Project
Kaposora, D.	WWF Programme Office
Khumalo, A.	WWF Zambezi Valley Project
Mackie, C. S.	WWF Support to Campfire Project (ZW0022) & WWF Zambezi Valley Project
Maguchu, C.	WWF Zambezi Valley Project and WWF Multispecies Project
Manambara, R.	Air photo interpretation
Masarira, T.	WWF Multispecies Project
Matika, O.	DR&SS, Matopos Research Station
Mazhangara, E.	DR&SS, Chiredzi Research Station
Mombeshora, B.	DR&SS, Farming Systems Research Unit
Muchena, M.	Planning Workshop
Mudhara, M.	DR&SS, Farming Systems Research Unit
Muir, A.	Technical advice
Murimbarimba, P.	DR&SS, Farming Systems Research Unit
Muzenda, H.	WWF Programme Office
Nykatawa, E.	DR&SS, Chiredzi Research Station
Owen, R.	Geology Dept., University of Zimbabwe
Roe, E.	Technical advice
Shade, N.	WWF Multispecies Project
Sibanda, R.	DR&SS, Matopos Research Station
Sikosana, J.	DR&SS, Matopos Research Station
Spurway, J.	DR&SS, Institute of Chemistry and Soil Science
Taylor, R.	WWF Resource Managememt Support to Campfire (ZW0022)
Thornton, P.	Planning Workshop

Timberlake, J.	Consultant
Tsinde, M.	WWF Zambezi Valley Project
Vermeulen, S.	WWF Zambezi Valley Project

We would also like to express our gratitude to the following Directors who at various times facilitated the work and progress of this project:

Mr. G. Nehanda,	Director, Institute of Agricultural Engineering, Agritex,
Dr. R. Gata	Director, DR&SS
Mr. C. Mushambi,	Head, CSRI, DR&SS
Mr. I. Marapara Head,	Chiredzi Research Station
Mr. J. Gambiza Head ,	Makoholi Research Station
Mr. T. Smith	Head , Matopos Research Station
Dr. V. Chadenga	Director, Tsetse & Trypansomiasis Control Branch
Mr. D. F. Lovemore	Head, Regional Tsetse and Trypanosomiasis Control Programme
Dr. W. Nduku	Department of National Parks & Wild Life Management

The following acronyms are used in this report:

CA	Communal Areas
DR&SS	Department of Research and Specialist Services
EU	European Union
GIS	Geographical information system
H/H	Households
MAPS	Multispecies Animal Production Systems Project
NPWLM	Department of National Parks & Wild Life Management
RDC	Rural District Council
VRs	Village Representatives
WWF	World Wide Fund for Nature

Exchange Rates

Value of Zimbabwe Dollar against US dollar, Swiss Franc and UK Pound Sterling (Pds) between 1980 and 1996

Year	Z$/US$	Z$:Sfr	Z$:PDs
1980	0.63	2.82	1.51
1981	0.72	2.51	1.37
1982	0.92	2.18	1.67
1983	1.11	1.97	1.61
1984	1.5	1.72	1.75
1985	1.64	1.26	2.37
1986	1.68	1.03	2.47
1987	1.66	1.29	3.09
1988	1.94	1.28	3.48
1989	2.27	1.47	3.64
1990	2.64	2.28	5.08
1991	5.05	3.72	9.42
1992	5.48	3.74	8.28
1993	6.94	4.68	10.24
1994	8.35	6.39	13.08
1995	9	8.07	14.42
1996	10	7.80	14.96

Subject: Fwd: SEBUNGWE ELEPHANT MANAGEMENT ACTION PLAN WORKSHOP: AGENDA
From: "John J. Jackson, III" <cf@conservationforce.org>
Date: 5/8/2015 4:08 PM
To: undisclosed-recipients:;
BCC: Tim Vannorman <Tim_Vannorman@fws.gov>, Bryan Arroyo - FWS <bryan_arroyo@fws.gov>, Dan Ashe <dan_ashe@fws.gov>, Rosemarie Gnam <Rosemarie_Gnam@fws.gov>, John Thodos <johnthodos@gmail.com>, bill brewster <bbrewster@caphillgrp.com>, Ralph Cunningham <ralphscunn@aol.com>, Mike Branham <mwbranham@gmail.com>, Lori Clem <Lori@toothacres.com>, Alan Sackman <a.sackman@sackman.com>, James Mitchell <jamesfrancis7277@aol.com>, Wes Bates <wcbates@steemer.com>, Shane Mahoney <conservationvisions@gmail.com>, Chrissie Jackson <cjackson@conservationforce.org>, Philippe Chardonnet <p.chardonnet@fondation-igf.fr>, "Damm, Gerhard" <gerhard@muskwa.co.za>, Dale Toweill <dtoweill@gmail.com>, Bert Klineburger <bklineburger@gmail.com>, Ben Carter <ben@biggame.org>, Karl Evans <mk_evans@yahoo.com>, Chris Hudson <chris-hudson@att.net>

FYI

-------- Forwarded Message --------
Subject: SEBUNGWE ELEPHANT MANAGEMENT ACTION PLAN WORKSHOP: AGENDA
Date: Fri, 8 May 2015 21:57:49 +0200
From: Lynne Taylor <lynne@thetashingainitiative.org>
To: Edson Chidziya <echidziya@zimparks.co.zw>, John J. Jackson, III <jjw-no2@att.net>, Marco Pani <(b) (6) Geoffreys Matipano <gmatipano@zimparks.co.zw>, Olivia Mufute <omufute@zimparks.co.zw>, Charles Jonga <CJonga@campfirezimbabwe.org>, James Watson <jwatson@padenga.com>, Prince Chapeyama <pchapeyama@padenga.com>, richard maasdorp <(b) (6)>, Clive Jones <clive@carguard.co.zw>, Prof. V. Dzingirai <(b) (6)>, David Cumming (b) (6), Martin Pieters <martin@bulembisafaris.com>, Tapera Chimuti <taperachimuti@citesmike.org>, Ian Games <igames@zol.co.zw>, Chris Pakenham <cjp@ciemerc.com>, Wendy Sithole <wsithole@zimparks.co.zw>, Tawanda Noel Gotosa <nyamazana@zol.co.zw>, Corris Ferreira <tahsafaris@zol.co.zw>, victor Mkhwebu <(b) (6)>, James Macilwaine (b) (6) Ashley Mudungwe <(b) (6)>, Thys De Vries <lde@netconnect.co.zw>, Paradzai Nemanshakwe

<lodzihunterspie@netconnect.co.zw>, Edson Gandiwa (b) (6), Joe Wright <joe@nationalsafaris.com>, Steve Edwards <(b) (6)>, Charles Ndongo <charles@afropride.co.zw>, Nicholas Milne <nick@bumihills.com>, Ray Townsend <ray@chapungusafaris.co.zw>, Jenny Nobes <rhinosafaricamp@gmail.com>, Enos Shumba <eshumba@wwf.org.zw>, Richard Hoare <(b) (6)>, Mark Brightman (b) (6), Lynne Taylor <lynne@thetashingainitiative.org>, Nigel Worthington <nworthington@padenga.com>

CC: Gary Sharp <gsharp@padenga.com>, Terrie Lee <tchinlee@padenga.com>, Pierre Steyn <psteyn@padenga.com>, Ian Buckle <ibuckle@padenga.com>, Regina Lennox <regina.lennox@conservationforce.org>, Charles Boddy <cboddy@padenga.com>, Alistair Pole <APole@awf.org>, Kevin Higgins <kevinh@ccsales.co.zw>, Felix Chimeramombe <fchimeramombe@zimparks.co.zw>

Dear All,

On behalf of Zimbabwe Parks and Wildlife Management Authority, Head of Management Service, Mr G Matipano, please find attached the AGENDA for the Sebungwe Workshop.

Looking forward to seeing you all there!

Best wishes
Lynne

Mr. Geoffreys Matipano

Head Management Services

Cnr Borrowdale Rd/Sandringham Drive

P.O Box CY 140, Causeway, Harare, Zimbabwe

Telephone: +263-4-7077624-7

Direct line : +263-4-792782

Cell : +263 912 116 389

--

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Director
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Attachments:

AGENDA_SEBUNGWE WORKSHOP.pdf 68.0 KB

AGENDA

SEBUNGWE ELEPHANT MANAGEMENT ACTION PLAN WORKSHOP

Venue: Musango Safari Camp **Date:** 19th to 22nd May, 2015

Day 1 - Tuesday 19th May

1600: Arrivals, registration and settle in

1900: Welcome Dinner

Day 2 - 20th May

0745: Welcome and Opening Remarks - DG - ZPWMA

0800: Introductions

0815: Law enforcement and anti-poaching in the Sebungwe - T. Gotosa and V. Mkhwebu

0840: Research on law enforcement - G. Moyo and A. Mudungwe

0900: Community perspectives - J. Miyozi

0920: Elephants and people in the Sebungwe - D. Cumming

0945: Objectives and purpose of the workshop - Facilitator

1000: TEA/COFFEE

1030: **1st Working Session**: Stakeholder Analysis - who are the key stakeholders and actors and what are the links between them? (Plenary)

1145: **2nd Working Session** - Initial Problem Analysis - What are the key issues and the cause-effect relationships between them? (Plenary - within the 5 Key Components of the Framework)

1245: LUNCH

1400: **3rd Working Session** - Strengths, opportunities and core competencies within each of the 5 Key Components of the framework and key stakeholder inputs (e.g. Hunting, Photo-tourism, Communities, ZRP/ZPWMA, NGOs) (Working Groups)

1530: TEA/COFFEE

1600: Report back from Working Groups

1730: Break for the evening

1900: DINNER

2030: Synthesis working group on problems and opportunities

Day 3 - Wednesday 21st May

0800: Report back from synthesis working group

0830: **4th Working Session:** Develop Draft Strategic Action Plan with Indicators - Working Groups

1030: TEA/COFFEE

1200: Report back from Working Groups

1245: LUNCH

1400: **5th Working Session:** Activities, responsibilities and Costs - Working Groups

1530: TEA/COFFEE

1600: Report back to plenary by Working Groups and development of Action Plan, Indicators and responsibilities

1745: Break for the evening

1900: DINNER

Day 4 - Thursday 22nd May

0730: **6th Working Session**: Final Development of Draft Strategic Action Plan with performance indicators, responsibilities and Next Steps

0945: Closing Remarks - DG - ZPWMA

1000: **Participants Depart**

Subject: Sebungwe Workshop Background Materials
From: "John J. Jackson, III" <cf@conservationforce.org>
Date: 5/11/2015 8:31 AM
To: Tim Vannorman <Tim_Vannorman@fws.gov>, Bryan Arroyo - FWS <bryan_arroyo@fws.gov>, Dan Ashe <dan_ashe@fws.gov>, Rosemarie Gnam <Rosemarie_Gnam@fws.gov>
BCC: Shane Mahoney <conservationvisions@gmail.com>, Chrissie Jackson <cjackson@conservationforce.org>, Philippe Chardonnet <p.chardonnet@fondation-igf.fr>, "Damm, Gerhard" <gerhard@muskwa.co.za>, Dale Toweill <dtoweill@gmail.com>, Bert Klineburger <bklineburger@gmail.com>, John Thodos <johnthodos@gmail.com>, bill brewster <bbrewster@caphillgrp.com>, Ralph Cunningham <ralphscunn@aol.com>, Mike Branham <mwbranham@gmail.com>, Lori Clem <Lori@toothacres.com>, Alan Sackman <a.sackman@sackman.com>, James Mitchell <jamesfrancis7277@aol.com>, Wes Bates <wcbates@steemer.com>, Michael Condon <mjc3030@aol.com>, CMS <admin1@cmsafaris.com>, Tharia Unwin - Johan Calitz Safaris <jachunt@mweb.co.za>, Scott O'Grady <zuluf16@gmail.com>, Tom Murphy <tomocean851@cox.net>, jc hurt <jchmidland@gmail.com>, John Barth <john@ausafari.com>, Michael Kreig <mkreig@ghcci.com>, Joas Makwati <j-makwati@gmail.com>, Mike Angelides <mikeangelides@hotmail.com>, Terry Patrick <tartansailor1@gmail.com>, Mike Murray <mike@murrayranches.co.za>, Alistair Pole <alistairpole@gmail.com>, Wilfried Pabst <wp@pabstholding.co.za>, Jeff Rann <jeffrann@yahoo.com>, Eric Pasanisi <ericpasanisi@hotmail.com>, Pete Fick <petefick@gatorzw.com>, George Harms <gharms@ghcci.com>, CAMPFIRE - Charles Jonga <cjonga@campfirezimbabwe.org>, Gary Ingersoll <gingersoll@pdq.net>, Pete De Villiers <hunterssa@mweb.co.za>, Troy Link <troy@jacklinks.com>, Steve Wagner <steve@blueheroncomm.com>, David Cumming <cummingdhm@gmail.com>, Bruce Rice <brucer@eip.net>, Zig Mackintosh <studio@ospreyfilming.com>, Jeff Smithers <jsmithers@smithersconstruction.com>, Bob Sakuta <BobS@delrecorp.com>, Greg Murtland <gmurt@turbinetoolandgage.com>, 'Kevin Atkinson' <atkinsonk123@gmail.com>, Audrey Murtland <Audrey@turbinetoolandgage.com>, Duane Corley <dtcorleylaw@yahoo.com>, "bardtexas@aol.com" <bardtexas@aol.com>, Clive Stockil <clives@senuko.com>, Coenraad Vermaak <cmv@cvsafaris.co.za>, John Odum <johnodum@comcast.net>, Marco Pani <pani.marco@gmail.com>, Peter Lindsey <palindsey@gmail.com>, Ken Stansell <Ken@Kennethstansell.com>, Dave Fulson <davefulson@mac.com>, Rolf Baldus <baldustravel@hotmail.com>, Rolf Baldus <rolfbaldus@t-online.de>, Mike Nice <mnice@sbcglobal.net>, Donald MacLauchlan <maclauchland@gmail.com>, Glenn LeMunyon <glenn@lemunyongroup.com>, Jay Koetsier <jaykoetsier@gmail.com>, "Capozza, Richard R." <RCapozza@hblaw.com>, Scott Petty <spetty@pettyco.com>, Happy <wrogers3@gmail.com>, Stephanie Coulter <stephanie.coulter@conservationforce.org>, Regina Lennox <regina.lennox@conservationforce.org>, Brad Fitzpatrick <bfitzoutdoors@gmail.com>, Louis Muller <louis@pro-saf.com>, "'SOAZ, Sally Bown'" <soaz@mweb.co.zw>, Bob Sakuta <BobS@delrecorp.com>, "Ozer, Howard" <ozer@uic.edu>, Norman Donati

<normd@hotmail.com>, Paul Gulbas <pgulbas@gmail.com>, Kevin Klumper <dcislim@qwestoffice.net>, Jimmy Tindol <jtindol@cactusind.com>, Robert Post <bp.posthardwoods@hughes.net>, Jim Wojciehowski <wojo@gci.net>, Charles Butler <crbutler@hickorytech.net>, Lee Friend <llfriend@bellsouth.net>, Josh Zigman <josh@zigmanshields.com>, Maxie Gremillion <mgrem@comcast.net>, Cliff Nuese <cn1115@earthlink.net>, Harlan Welch <enoughgun@gmail.com>, John Johnson <drj@gnwah.com>, "E. Fundira" <efundira@hotmail.com>, Peggy Gillenwater <peggygillenwater@gmail.com>, George DeBell <gwdebell@kellersupply.com>, Martin Tomerlin <mtomerlin@legendhc.com>, George Kopecky <gk@greenecobuilds.com>, David Adams <dadamstulsa@icloud.com>, Sheni Lalji <scl@raha.com>, David Romano <landdhunting@wvdsl.net>, bill brewster <bbrewster@caphillgrp.com>, Ralph Cunningham <ralphscunn@aol.com>, Mike Branham <mwbranham@gmail.com>, Wes Bates <wcbates@steemer.com>, Bruce Barany <bruceofgs2@aol.com>, Rowan Martin <mockingchatzim@gmail.com>, Chris Tomassi <chris_tomassi@epw.senate.gov>, Bill Muzyl <bill@muzyl.com>, Chris Hudson <chris-hudson@att.net>, Thys De Vries <lde@netconnect.co.zw>, Roger Dean <jeaneane12@vnet.net>, Mayes Taxidermy Studio <mayestaxidermy@mayestaxidermy.com>, Mike Jines <mjines@live.com>, Rick Bonander <rick@inter-mountain.com>

Tim,

Attached is one of the more enlightening background documents for the Sebungwe Elephant Action Planing Workshop commencing on May 19.

Best,
John

John J. Jackson, III
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3240 S. I-10 Service Road W., Suite 200
Metairie, Louisiana 70001
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From: Marco Pani <(b) (6) [redacted]>
Date: May 9, 2015 at 5:18:29 AM EDT
To: Geoffreys Matipano <gmatipano@zimparks.co.zw>, Olivia Mufute <omufute@zimparks.co.zw>, David Cumming <(b) (6) [redacted]>, "John J. Jackson III" <jjw-no2@att.net>, Regina Lennox

<regina.lennox@conservationforce.org>
Cc: Edson Chidziya <(b) (6)>, Lynne Taylor <lynne@thetashingainitiative.org>, Russell Taylor <(b) (6)>
Subject: Re: Some background material for the Sebungwe workshop.

H all,

Thanks to KD I can send the full paper.

Dunham, K. M., 2008: Detection of anthropogenic mortality in elephant Loxodonta africana populations: a long-term case study from the Sebungwe region of Zimbabwe. Oryx 42(1): 36-48

Attachments:

Sebungwe_elephants_Oryx_2008.pdf	256 KB
Attached Message Part	13.2 KB

Detection of anthropogenic mortality in elephant *Loxodonta africana* populations: a long-term case study from the Sebungwe region of Zimbabwe

Kevin M. Dunham

Abstract A survey of the Sebungwe elephant *Loxodonta africana* population in Zimbabwe in 2006 revealed a large rise in the number of dead elephants. The estimated number of carcasses increased >16-fold from 1989 to 2006 and the carcass ratio (number of all elephant carcasses as a percentage of the number of all elephants) rose from 1.25 to 15.4%. The ratio for fresh or recent carcasses, which reflected the mortality rate during the survey year, increased from 0.19 to 1.70% during 1995-2006. Records of elephants killed before 1995 were supplemented with estimates of the numbers killed after 1995, with these estimates increasing exponentially, as did the observed number of fresh or recent carcasses. A maximum likelihood analysis to compare population models revealed that the best fit to the survey estimates of this closed population was a model that started with 9,500 elephants in 1979 and that each year increased at 4.02% and decreased by the number killed, with the number killed annually increasing at 23.5% per year after 1995. A rise in anthropogenic mortality, mostly due to poaching, caused the increase in carcass numbers observed after 1999. Since 1997 the mortality rate of elephants in the National Parks and Safari Areas in the Sebungwe has been positively correlated with the observed number of poachers' camps. Anthropogenic mortality is now great enough to keep the elephant population approximately constant at 14,000-16,000 animals. The population number was also constant (at a lower level) during the 1980s, when elephants were culled and the sale of meat, hides and ivory covered the costs of elephant management but there have been no recent culls, partly because the ivory trade ban prevents tusks from culled elephants being sold to offset the costs of management. This study illustrates the value of a long-term data set collected with consistent techniques, and including data on other species and the environment collected at no extra cost under the financial umbrella of a charismatic species.

Keywords Aerial survey, carcass, elephant, *Loxodonta africana*, MIKE, poaching, population model, Zimbabwe.

Introduction

The African elephant *Loxodonta africana* is categorized as Vulnerable on the IUCN Red List (IUCN, 2007) and international trade in ivory is banned except for occasional sales by the management authorities of some southern African countries. However, the ban and the sales are controversial (Reeve *et al.*, 2003), with some range states supporting the resumption of the ivory trade as a means to provide funds for conservation and to protect woodlands. Although ivory sales by Namibia, Botswana and South Africa were approved in principle by CITES in 2002, these sales are conditional on the ability of the Monitoring of Illegal Killing of Elephants (MIKE) programme (CITES, 2004) to establish up-to-date and comprehensive data on elephant poaching and populations.

Kevin M. Dunham PO Box CH385, Chisipite, Harare, Zimbabwe. E-mail faykevin@zol.co.zw

Received 12 March 2007. Revision requested 15 May 2007. Accepted 25 June 2007.

The 2006 survey of the closed population of elephants in the Sebungwe region of Zimbabwe, a mosaic of national parks, safari areas and communal lands, revealed that since 2001 there had been a large increase in the number of elephant carcasses, but no decrease in the number of live elephants. The Sebungwe survey programme commenced in 1979 but despite the considerable effort that has gone into it, the population trend has been unclear, being described as stable but with the possibility of a slight increase (Price Waterhouse, 1996; Cumming & Lynam, 1997), or as stable or declining (Hoare, 1998). Prior to 1980 the number of elephants in the Sebungwe increased at *c.* 5% annually (Cumming, 1981) and, since the last cull in 1992, mortality was thought to be low (Hoare, 2000). Hence, if the population growth rate was still 5% the Sebungwe elephants should have almost doubled in number since 1992.

This study of the long-term trends in the Sebungwe elephant population was undertaken to address two questions: (1) Why was there a large increase in the number of elephant carcasses between 2001 and 2006

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but no decrease in the number of live elephants? (2) What is the current trend of the Sebungwe elephant population and, if the population growth rate is not *c*. 5% as it was before 1980, why has it changed?

A simple population model was used to mimic the observed trends in the Sebungwe elephant population, and then the mortality rate in the modelled population was compared with the observed trend in the number of elephant carcasses. The relevance of this study goes beyond both Sebungwe and its elephant population, and relates to the credibility of sample surveys for monitoring long-term trends in the numbers of savannah elephants and other large herbivores in Africa and beyond. The international attention attracted by elephant poaching during the 1970s (Cumming *et al.*, 1990) and the 1989 ivory trade ban has caused the African elephant to be probably the best monitored of the world's widely-distributed large mammals (Blanc *et al.*, 2004). Sample surveys are often used to census elephants and are a recommended technique for the MIKE programme (Craig, undated).

Study area

The Sebungwe study area covers *c*. 15,000 km^2 in north-west Zimbabwe, with the southern shore of the man-made Lake Kariba as its northern boundary (Fig. 1). The

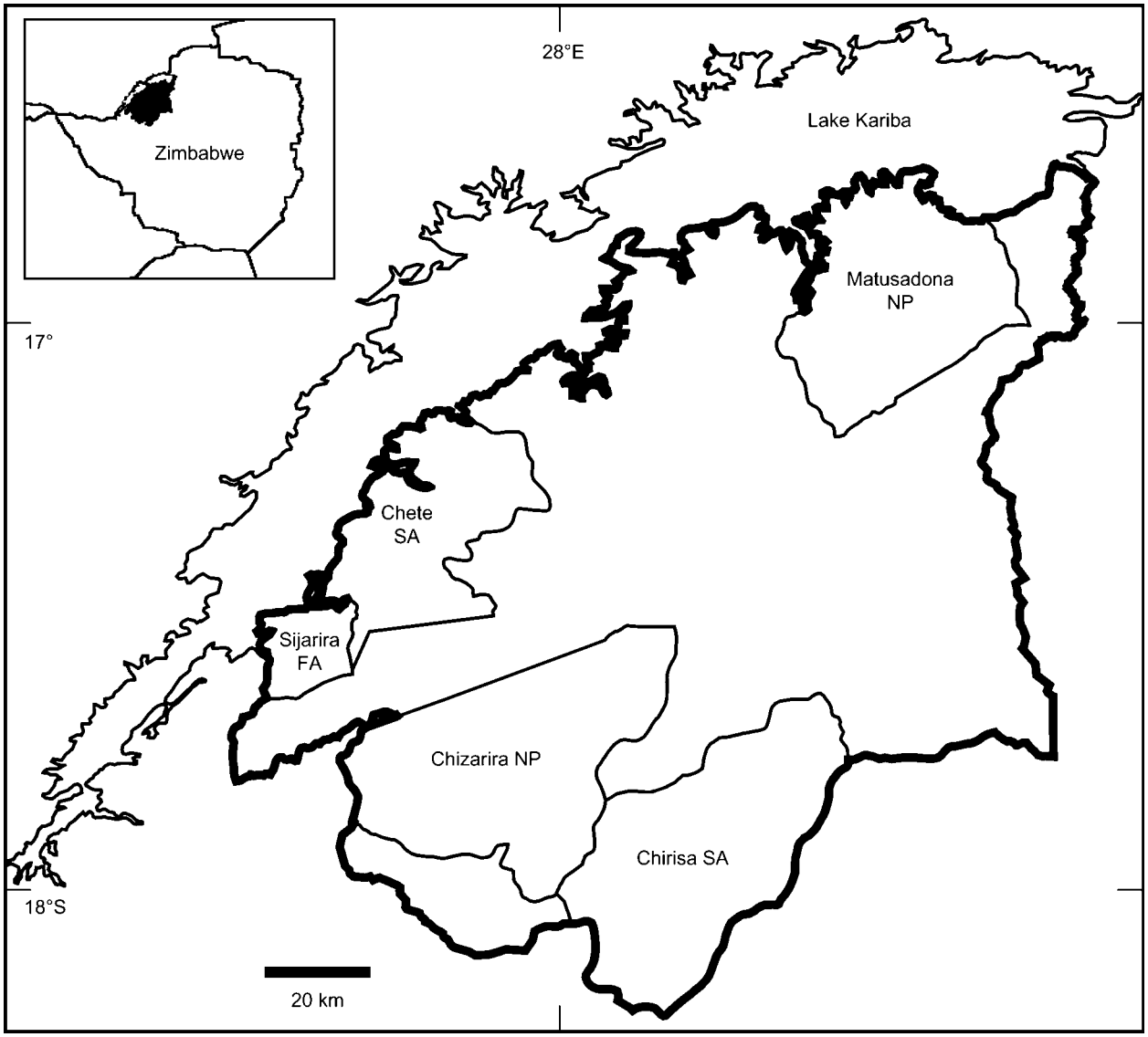

Fig. 1 The Sebungwe region (the insert shows its location in north west Zimbabwe). The region includes two National Parks (NP), two Safari Areas (SA) and a Forest Area (FA). The remainder of the region is communal land. To the south and the east the boundary of the study area (bold solid line) is the line of the old northern Sebungwe game fence.

topography varies from almost flat in the unflooded sections of the Zambezi Valley, through undulating hills, to steep escarpments. Mostly-seasonal rivers flow generally north-westwards into Lake Kariba. The natural vegetation is mostly *Brachystegia* and *Julbernardia* woodland on higher ground with shallow, light-textured soils, and *Colophospermum mopane* woodland on heavier soils on valley floors, with riparian woodland along rivers and streamlines, and small areas of thickets and grasslands (Timberlake *et al.*, 1993). Generally, the region experiences a hot wet season during November-April, a cool dry season during May-July and a hot dry season during August-October. Annual rainfall at the Sengwa Wildlife Research Institute in the south of the area averaged 668 mm (range 288 1,026 mm) during 1965-1996 (Osborn, 1998). Even at the end of the dry season few parts of the Sebungwe are >10 km from drinking water for elephants (Cumming, 1981).

The Sebungwe contains a mosaic of protected areas (Chizarira National Park, 1,910 km^2; Matusadona National Park, 1,407 km^2; Chirisa Safari Area, 1,713 km^2; Chete Safari Area, 1,081 km^2; collectively known as Parks and Wildlife estate), Sijarira Forest Area (*c.* 270 km^2) and communal lands. Cumming (1981) described the history of land use before 1980, noting how the region's elephants became isolated from other populations by the flooding of the Zambezi Valley following completion of Kariba Dam in 1958, and by a tsetse fly (*Glossina* spp.) control programme that involved the erection during 1956-1969 of game fences to the south and east of the study area and the shooting of >2,600 elephants outside the southern boundary of the study area. Later, many people moved into the area and now people and domestic livestock occupy much of the communal land, and large areas of woodland have been cleared for subsistence and small-scale commercial agriculture (Cumming & Lynam, 1997). Consequently, the elephant population has been compressed into the Parks and Wildlife estate and those communal areas where the density of people is low (Hoare, 1999; Hoare & du Toit, 1999). The close proximity of people and elephants prompted the establishment of community-based natural resource management programmes (CAMPFIRE; Martin, 1986). The Sebungwe includes the MIKE study site of Nyami Nyami (CITES, 2004).

Since 1980 elephant management in the Sebungwe has included sport hunting in Chirisa and Chete Safari Areas, in CAMPFIRE areas, and in Sijarira Forest Area, the shooting of problem animals, and the shooting of entire herds (culls) to reduce elephant numbers in the two National Parks and in Chirisa Safari Area during the 1980s and early 1990s. However, the boundaries of the different land-use categories are largely artificial and elephants can and do move freely between the National Parks (where they are legally protected), the Forest and Safari Areas (where small numbers of elephants and other large mammals are hunted annually under licence by sport hunters), and the communal lands (where sport hunting also occurs, and where people, cultivation and domestic livestock are present but at variable densities; Hoare & du Toit, 1999).

Methods

Elephant surveys

The first rigorous census of the Sebungwe elephants was in 1979 (Cumming, 1981). Since then, similar sample aerial surveys have been undertaken regularly during the dry season by the Parks and Wild Life Management Authority (formerly the Department of National Parks & Wild Life Management), often in partnership with the WWF Southern African Regional Programme Office (references in Table 1). The methods were those recommended for surveys of large African herbivores (Jolly, 1969; Norton-Griffiths, 1978). Dunham *et al.* (2006) detail the methods. Observers searched for elephants and elephant carcasses but other large herbivores, wild and domestic, and items of interest, e.g. poachers' camps, were also counted. Attempts were made to ensure that observer bias was minimized, and approximately constant between years, by employing keen, experienced, volunteer observers of proven ability and immune to airsickness, and ensuring that search intensity and the widths of search strips were approximately constant between years. Early during the survey programme strata boundaries varied between years, as more information about elephant distribution became available. But since a 1996 review of elephant censusing in Zimbabwe (Price Waterhouse, 1996), techniques have been standardized, thereby facilitating between-year comparisons. The scale of each survey is illustrated by the 2006 census, which involved 72.6 hours of flying, and searching 15% of the 15,622 km^2 survey area (divided into 26 strata, with 24 strata sampled with systematically-arranged transects and two with blocks; Dunham *et al.*, 2006).

Data sources

Surveys were conducted in 20 years during 1980-2006 and I extracted data on elephants and carcasses from the published reports, and from Price Waterhouse's (1996) summary (Table 1). The number of domestic cattle in the Parks and Wildlife estate provides one index of illegal activities. Since 1997 the reports have included the estimated number of poachers' camps and this estimate provides a second index.

The number of elephants recorded killed by people each year in the Sebungwe for whatever reason, legal or illegal, is given by Martin (1992a) for 1960-1991 and by

Table 1 Summary of the sample aerial surveys of elephants in the Sebungwe region of Zimbabwe during 1980 2006. There were no surveys in 1986, 1990, 2000 or 2002 2005.

Year	Size of survey area (km^2)	Estimated number of elephants	Variance of estimate	Source
1980	14,107	11,144	1,308,204	Cumming & Taylor (1997)
1981	12,865	8,797	712,609	Cumming & Taylor (1997)
1982	5,715	6,111	*	Price Waterhouse (1996)
1983	14,871	9,302	683,557	Cumming & Taylor (1997)
1984	6,027	5,958	*	Price Waterhouse (1996)
1985	6,038	5,150	*	Price Waterhouse (1996)
1987	6,069	3,208	*	Price Waterhouse (1996)
1988	13,708[1]	7,065	866,761	Gibson (1988)
1989	12,567	13,290	3,429,431	Gibson (1989)
1991	15,118	13,533	1,996,936	Taylor *et al.* (1992)
1992	8,536	9,254	1,244,376	Taylor & Mackie (1993)
1993	15,862	10,836	1,253,468	Cumming *et al.* (1997)
1994	10,733[2]	8,596	632,651	Mackie (1994)
1995	15,685	11,797	994,141	Mackie (1995)[3]
1996	15,403	13,257	900,886	Mackie (1997)
1997	15,597	13,388	419,501	Mackie (1998)
1998	15,577	10,144	360,146	Mackie (1999)
1999	15,620	16,022	1,525,235	Dunham (1999)
2001	15,622	13,988	1,146,213	Mackie (2002)
2006	15,622	15,024	1,164,503	Dunham *et al.* (2006)

*Not given
[1]Highlands of Matusadona National Park were not surveyed; the peak population estimate for this 1,010 km^2 stratum was 1,628 elephants during 1997.
[2]Matusadona National Park was not surveyed
[3]With corrections to the carcass estimate

Booth *et al.* (1996) for 1960-1995. The number killed annually was usually <100, except during 1980-1981, 1984-1986 and 1991-1992 when >2,000 elephants in total were culled. Martin's (1992a) numbers of those killed during 1989-1991 are greater than Booth *et al.*'s (1996) and I have used the greater numbers because other sources (Payne, 1998) suggest these are more likely to be correct.

Data evaluation

Prior to 1996 the area of the Sebungwe elephant range that was surveyed varied greatly from year to year (Table 1). Parts of the Parks and Wildlife estate (which contains 65-70% of the region's elephants; Martin & Taylor, 1983) were not surveyed during some years. Hence, my analysis included only post-1979 surveys that (1) sampled all of Matusadona and Chizarira National Parks, and Chirisa and Chete Safari Areas, and (2) surveyed a total area >12,500 km^2, i.e. >80% of the Sebungwe elephant range. Surveys during 13 years met these conditions.

Preliminary inspection of the elephant data revealed that the annual rate of population growth between consecutive surveys varied from 24% during 1997-1998 to +58% during 1998-1999. The latter rate is not credible for a closed population of elephants, and further inspection revealed that of seven large herbivores with populations of >1,000 during 1997, six (elephant, buffalo *Syncerus caffer*, sable *Hippotragus niger*, kudu *Tragelaphus strepsiceros*, waterbuck *Kobus ellipsiprymnus* and zebra *Equus burchelli*) supposedly experienced a decline of >21% between 1997 and 1998, and then an increase of >58% between 1998 and 1999. Increases of this size are not biologically possible in closed populations of these species and the most likely explanation for these observations is that there was marked under-counting bias during the 1998 survey, which I eliminated from the data set. Twelve surveys remained in this set and the annual rate of population increase between consecutive surveys varied from 21 to +12%.

Elephant carcasses

The time since death was recorded approximately for each elephant carcass by the observers, who allocated each carcass to an age category (Douglas-Hamilton & Hillman, 1981), with category 1 representing fresh carcasses, category 2 recent carcasses, and category 3 old carcasses. Generally, category 1 and 2 carcasses were elephants that died during the year of the survey (mostly since the end of the rainy season) and category 3 carcasses were elephants that died either during earlier years, or possibly during the previous rainy season. Carcasses at cull sites were not recorded as carcasses during surveys (Gibson, 1989).

The survey reports usually gave the carcass ratio *sensu* Douglas-Hamilton & Burrill (1991; although it is a percentage, not a ratio), which is the estimated number of all elephant carcasses as a percentage of the estimated number of all elephants (i.e. live plus dead). This all-carcass ratio is an index of the elephant mortality rate (excluding mortality due to culls) during the several years prior to the survey. If the reports included data on carcass categories, I calculated the category 1+2 carcass ratio, which is an index of the elephant mortality rate during the year of the survey (excluding deaths due to culls but including all other causes, natural and anthropogenic). The category 1+2 carcass ratio is defined as the estimated number of elephant carcasses in age category 1 or 2, expressed as a percentage of the sum of this number and the estimated number of live elephants. I calculated the 1+2 carcass ratio for the entire Sebungwe, and separate ratios for the Parks and Wildlife estate and the communal lands.

Population trend analysis

The observed trend in the elephant population was determined by regressing the natural logarithms of the population estimates against time (Caughley, 1977). The slope of this line is the exponential rate of population increase per annum (r) but here population growth rates are presented as percentages ($= 100(e^{r} \quad 1)$), which are generally easier to understand. Statistical analyses were conducted using *SYSTAT* (Wilkinson, 1997). Regression analysis was also used to determine trends in carcass numbers and ratios. Trends were regarded as statistically significant if the slope of a regression line was significantly different from zero. Two population estimates were regarded as significantly different if their 95% confidence intervals did not overlap.

Population model

The number of elephants in the Sebungwe was mimicked with a model that started with an assumed population number, and determined elephant number during the following year by increasing the starting population by an assumed population growth rate, and then reducing it by the number killed during that year (Martin, 1992b). Thus $N_t = [(1 + r/100). N_{t-1}] \quad C_{t,}$ where N_t = number of elephants in year t, C_t = number of elephants killed during year t, and r = mean rate of population increase per year, as a percentage (where $(1 + r/100) = \lambda$, the growth multiplier (Caughley, 1977)).

The trend in the number of elephants predicted by a model was compared to the survey estimates of elephant number using Martin's (1992b) maximum likelihood estimator (Appendix). The outcome of this analysis is an estimator that equals one if the predicted and estimated numbers are identical during all survey years, and declines towards zero the less perfect the fit between the predicted and estimated numbers. For convenience, this estimator is multiplied by 1,000 to give an index value. When several models are compared, the one that gives the greatest index value is the model that provides the best fit to the survey estimates.

I considered the possibility that additional elephants may have been killed before 1995 and that the real number killed may have been greater than the recorded number. During the first phase of the modelling the model was run for 1979-1995 and the *Microsoft Excel* add-in *Solver* was used to determine the values of the starting population during 1979, the population growth rate and the number of additional (unrecorded) elephants shot annually during 1980-1995 that maximized the index value. The initial assumed starting population was 10,000 and constrained to be an integer ≥8,000 and ≤12,000, as estimated by a 1979 survey (Cumming, 1981). The initial assumed mean growth rate of the population was 3.5% annually (and constrained to be ≥0 and ≤7%). The initial assumed number of additional elephants killed annually was 100 (and constrained to be an integer ≥0 and ≤200). Executing *Solver* was equivalent to running a series of models with different combinations of a starting population, a growth rate and a number of additional elephants killed. There were seven surveys during 1980-95, and to determine the robustness of the conclusions the procedure was repeated seven times, each time dropping a different survey estimate from the calculation of Martin's (1992b) index value.

The first phase of the modelling revealed that the fit of the predicted population numbers to the survey estimates during 1980-1995 was not improved by assuming that unrecorded elephants were killed during this period. Hence, during the second phase I assumed that the numbers killed during 1980-1995 were the recorded numbers. However, there are no published records of the numbers killed during 1996-2006 and I assumed that the number killed annually after 1995 may have increased. The model was run for 1979-2006 and *Solver* used to determine the values of the starting population during 1979, the population growth rate and the exponential rate of increase in the number of elephants killed annually after 1995 that maximized Martin's index value. The initial assumed exponential rate of increase in the number of elephants killed annually was zero, equivalent to a constant number killed each year after 1995, and the exponential constant was constrained to be ≥0 and ≤0.5. There were 12 surveys during 1980-2006 and to determine the robustness of the conclusions the procedure was repeated 12 times, each time dropping a different survey estimate from the calculation of the index value.

Results

Elephants

The number of elephants in the Sebungwe increased from 9,000-11,000 during the early 1980s to 14,000 16,000 during 1999-2006 (Fig. 2). The mean observed rate of increase during 1980-2006 was 1.85% annually (equivalent to an exponential rate of 0.0183 per annum).

Carcasses

The estimated number of all elephant carcasses in the Sebungwe increased >16-fold from 1989 to 2006. Carcass number was approximately constant during 1989-1993, then increased three-fold to a new constant level during 1996-1999 and thereafter increased dramatically to 2,733 during 2006 (Fig. 3a). Similarly, the all-carcass ratio increased from 1.25% during 1989 to 15.4% during 2006 (Fig. 3b).

The estimated number of fresh or recent carcasses in the Sebungwe increased from 23 during 1995 to 260 during 2006, with an exponential model providing a good fit to the mean estimates (Fig. 3c). Similarly, the category 1+2 carcass ratio increased from 0.19% during 1995 to 1.70% during 2006 (Fig. 3d). The increase in this ratio indicated there was a large rise in the mortality rate: the increase in the number of fresh or recent carcasses was not simply a consequence of a larger number of elephants dying because there were more live elephants. In the communal lands the major increase in the category 1+2 carcass ratio (and therefore in the mortality rate) was between 1999 and 2001, but in the Parks and Wildlife estate the major rise was between 2001 and 2006 (Fig. 3d).

The estimated number of old carcasses in the Sebungwe increased >5-fold between 1995 and 2006. There were 1,717 more old carcasses during 2006 than in 2001 and most of these were elephants that died before, not during, 2006. This indicated that the mortality rate was high not only during 2006 but also during the intervening (non-survey) years of 2002-2005.

Population model

The maximum likelihood analysis to compare population models for 1979-1995 revealed that a model population during 1979 of approximately 9,600 elephants, which each year increased at a rate of 3.77% and decreased by only the recorded number killed, provided a better fit to the survey estimates during 1980-1995 than alternative models with different starting populations, growth rates, or any additional (unrecorded) elephants killed. Although there were small variations in the starting population and growth rate according to which survey estimates were included in the likelihood analysis, the number of additional elephants killed was consistently zero in the best models (Table 2).

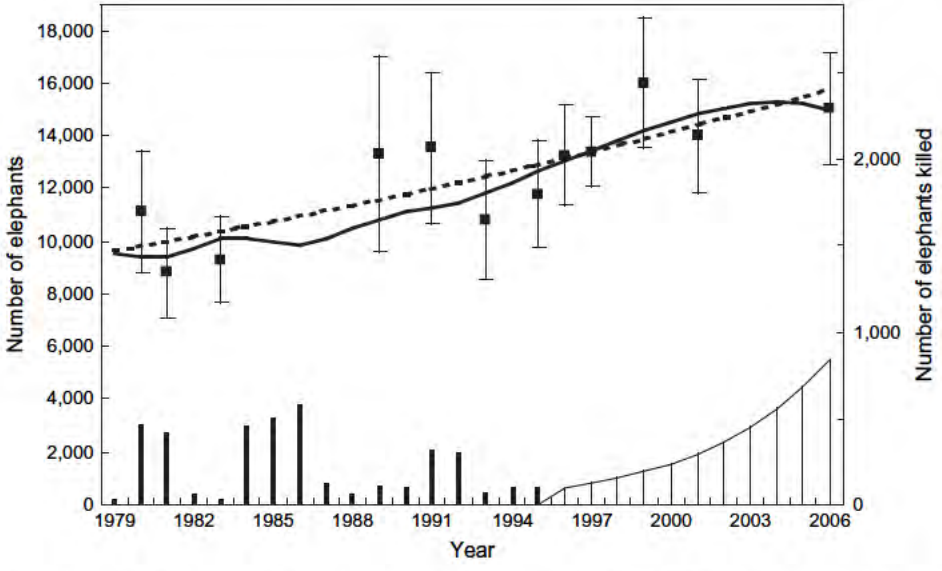

Fig. 2 Number of elephants in the Sebungwe, as estimated by aerial surveys during 1980 2006, with mean population estimates and 95% confidence intervals (left axis). Data sources as in Table 1. The observed trend (dashed line) is an exponential curve calculated from the slope (r) of a linear regression of the natural logarithm of the mean estimate against year (r 0.0183 ± SE 0.0042, n 12, t 4.341, P 0.0015). The trend (bold line) in a modelled population that gave the best fit to the survey estimates is also shown. The modelled population started with 9,501 elephants during 1979, grew at 4.02% per annum and each year was reduced by the number killed that year (histogram, right axis: for 1980 1995, number recorded killed; for 1996 2006, estimated number killed, with the estimated number killed increasing at 23.5% per annum). Note differing scales for left and right axes.

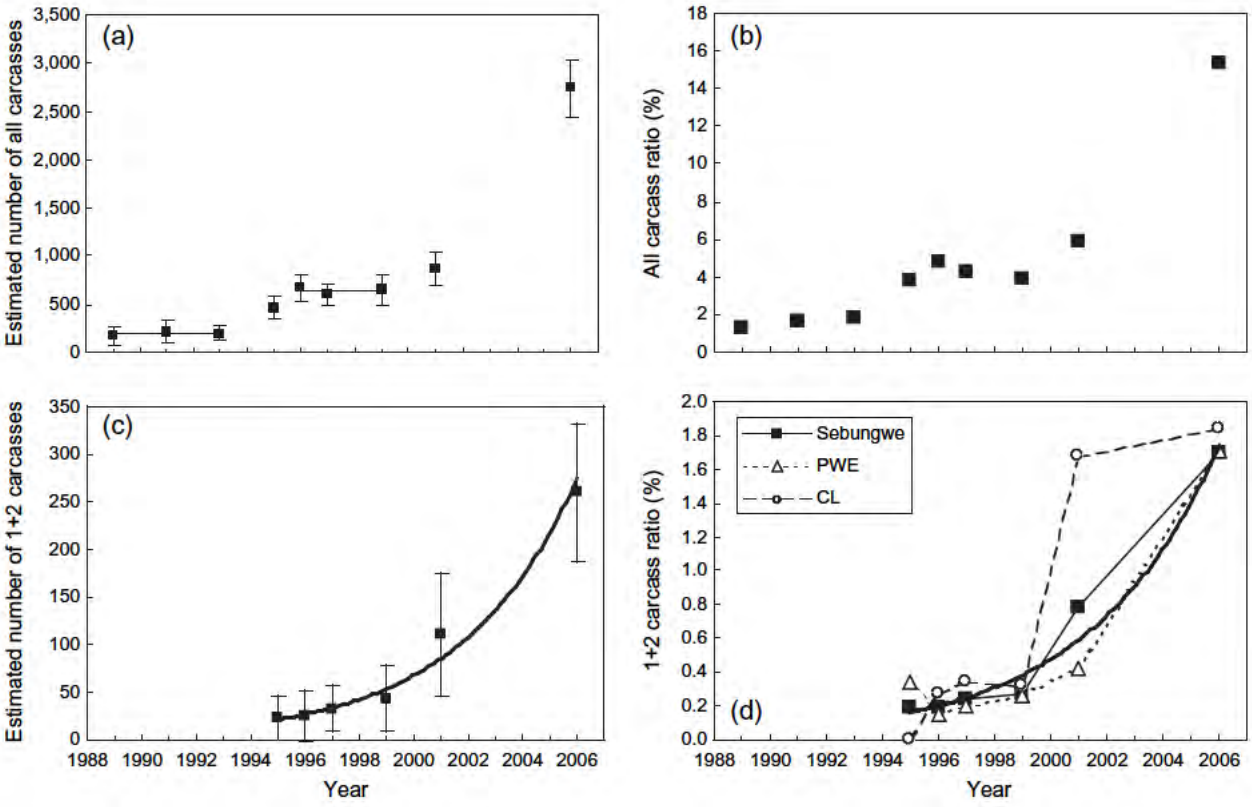

Fig. 3 (a) The number of all carcasses of elephants in the Sebungwe, as estimated by aerial surveys, with mean estimates and 95% confidence intervals. This estimate is an index of the number of elephants that died during the several (but unknown number of) years prior to the survey. The horizontal lines indicate the mean values for 1989 1993 (196) and 1996 1999 (641). Data sources as in Table 1. Carcass data were not reported for pre 1989 surveys. (b) The all carcass ratio for elephants in the Sebungwe during 1989 2006. This ratio provides an index of the mortality rate of elephants during the several (but unknown number of) years prior to the survey. (c) The number of fresh or recent carcasses (category 1 or 2) of elephants in the Sebungwe, as estimated by aerial surveys, with mean estimates and confidence intervals. This estimate is an index of the number of elephants that died during the survey year. Carcass age categories have been reported for all surveys since 1995. The observed trend (bold line) is an exponential curve calculated from the slope (r) of a linear regression of the natural logarithm of the mean estimate against year (r 0.2336 ± SE 0.0200, 95% confidence limits 0.18 & 0.29, n 6, t 11.658, P 0.0003, r^2_{adj} 0.97). (d) The category 1+2 carcass ratio for elephants in the Sebungwe during 1995 2006. This ratio provides an index of the mortality rate of elephants during the survey year. Ratios are shown separately for the entire Sebungwe study area, for the Parks and Wildlife estate (PWE) and for the communal lands (CL).

The maximum likelihood analysis to compare population models for 1979-2006 revealed that the best fit to the survey estimates during 1980-2006 was a model that started with a population of *c*. 9,500 elephants during 1979 and that each year increased at a rate of 4.02% and decreased by the number of elephants recorded killed during 1980-1995 and estimated killed during 1996-2006, with this estimated number increasing by 23.5% annually (equivalent to an exponential rate of 0.211 per year; Fig. 2, Table 3). The fit of this model was better than that of alternative models with different starting populations, growth rates, or rates of increase in the number of elephants killed annually after 1995. If the 2006 survey estimate was not included in the likelihood analysis, the predicted population trend after 2001 was a poor fit to the observed trend because the increase in the number of elephants killed annually after 1995 was overestimated.

The rate of increase in the number of elephants killed annually after 1995 (23.5%) in the best-fitting population model was within the confidence limits of the annual rate of increase in the number of fresh and recent carcasses observed during surveys (26.3%; Fig. 3c). This same model predicted that 2,894 elephants were killed between the 2001 and 2006 surveys.

Illegal activities

Illegal activities in the Parks and Wildlife estate, as indicated by the numbers of poachers' camps and cattle,

Table 2 Parameters for elephant population models for 1979 1995 that assumed that the number killed annually during 1980 1995 may have been greater than the number recorded killed. A series of models was run using different combinations of an assumed starting population, an assumed growth rate, and an assumed number of additional (unrecorded) elephants killed. This table gives the parameters for the model that provided the best fit of the predicted population numbers to the estimated numbers. Index values were calculated first using all survey estimates and then recalculated seven times, each time dropping one estimate from the calculation. The mean values are for models selected using index values calculated with only six survey estimates.

Survey year dropped from index value calculation	Peak index value	Starting population number during 1979	Population mean growth rate (% per yr)	Number of additional elephants killed annually during 1980 1995
none	*	9,603	3.77	0
1980	34.7	9,066	4.30	0
1981	15.7	10,105	3.33	0
1983	19.4	10,089	3.39	0
1989	26.5	9,517	3.76	0
1991	50.5	9,552	3.60	0
1993	12.4	9,574	3.96	0
1995	12.1	9,464	4.17	0
Mean		9,624	3.78	0

*Not given because this index value was calculated as the product of seven relative values and so cannot be compared with the other index values in this table, which were calculated as the product of six relative values.

increased between 2001 and 2006 (Fig. 4a). The elephant mortality rate in the Parks and Wildlife estate during any survey year (as indexed by the category 1+2 carcass ratio) was significantly and positively correlated with the number of poachers' camps in the estate during the same year (Fig. 4b).

Discussion

Trends in the Sebungwe elephant population

The trend of the modelled population that gave the best fit to the survey estimates (Fig. 2) is likely to be a reasonable representation of the trend exhibited by the

Table 3 Parameters for elephant population models for 1979 2006 that assumed that the number of elephants killed annually after 1995 may have increased exponentially. A series of models was run using different combinations of an assumed starting population, an assumed growth rate and an assumed rate of increase in the number of elephants killed annually after 1995. This table gives the parameters for the model that provided the best fit of the predicted population numbers to the estimated numbers. Index values were calculated first using all survey estimates and then recalculated 12 times, each time dropping one estimate from the calculation. When the 2006 estimate was dropped the predicted population trend line did not pass through the confidence interval of the 2006 survey estimate. The mean values are for the models selected using the reduced data sets for the analysis, but excluding the model selected when the 2006 estimate was dropped.

Survey year dropped from index value calculation	Peak index value	Starting population number during 1979	Population mean growth rate (% per yr)	Rate of increase in number of elephants killed annually after 1995 (% per yr)
none	*	9,501	4.02	23.5
1980	8.02	9,049	4.38	25.6
1981	2.98	9,870	3.74	21.7
1983	3.98	9,934	3.70	21.6
1989	5.00	9,380	4.10	23.7
1991	7.39	9,355	4.10	23.4
1993	3.08	9,572	4.00	23.9
1995	2.97	9,531	4.04	24.3
1996	2.02	9,500	4.01	23.2
1997	1.98	9,496	4.04	23.8
1999	6.86	9,601	3.86	21.3
2001	2.91	9,394	4.16	24.7
2006	2.19	9,421	4.14	38.0
Mean (excluding when 2006 dropped)		9,517	4.01	23.4

*Not given because this index value was calculated as the product of 12 relative values and so cannot be compared with the other index values in this table, which were calculated as the product of 11 relative values.

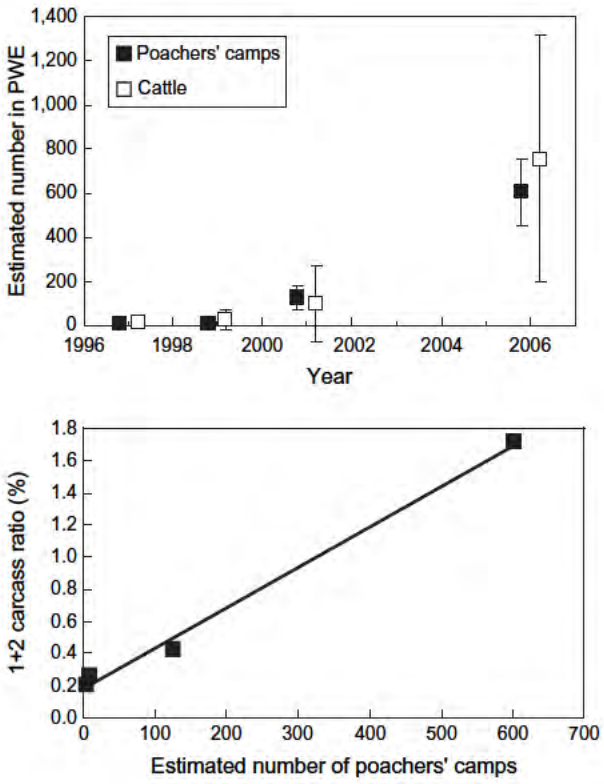

Fig. 4 (a) The numbers of poachers' camps and cattle (indices of illegal activity) in the Parks and Wildlife estate (PWE) of the Sebungwe, as estimated by aerial surveys, with mean estimates and 95% confidence intervals. Data sources as in Table 1. Poachers'camps were not reported for pre 1997 surveys. (b) The mortality rate of elephants in the Sebungwe Parks and Wildlife estate, as indexed by the category 1+2 carcass ratio for the estate, was correlated with the estimated number of poachers'camps in the estate (n 4 surveys; 1997, 1999, 2001 and 2006, correlation coefficient 0.9968, P <0.01; line for illustrative purposes).

Sebungwe elephant population since 1980. When anthropogenic mortality was discounted this population increased at 4.02% annually. This mean rate represented the excess of births over natural deaths. It is close to the 5% rate displayed before 1980 (Cumming, 1981) and similar to two predictions (4.32 and 4.89%) based largely on data from elephants culled in the Sebungwe (Craig, 1989).

The simple population model used here assumed that the difference between the fecundity and mortality rates was approximately constant from year to year, although for elephants this is not always so (Gough & Kerley, 2006). The model's predicted population trend would always be a poor fit to survey estimates if there is unusually high natural mortality in any year. An apparent decline in the number of elephants in the Sebungwe between 1991 and 1993 coincided with a severe drought across southern Africa and some elephant populations, e.g. in Gonarezhou, suffered significant mortality (Leggett, 1994). However, the Sebungwe population appeared to be relatively unaffected, with no obvious increase in mortality (S. Alibhai & Z. Jewell, pers. comm.; K. Payne, pers. comm.). In the Sebungwe it was during 1994-1995 that rainfall was particularly low and while there was no evidence that the number of live elephants declined then, the all-carcass ratio doubled between 1993 and 1995. But 95% of carcasses seen during the 1995 survey were of elephants that died before the 1995 dry season. Hence, the Sebungwe elephants appeared to be less susceptible to drought-related mortality than some other elephant populations.

There were three phases in the trend of the Sebungwe elephant population during 1980-2006. During 1980-1987 population number was approximately constant, with the culling of >2,000 elephants preventing any increase. After 1987, until *c.* 1999, the population number increased steadily because anthropogenic mortality was generally low (the numbers of elephants culled during 1991 and 1992 were too small to prevent the increase). After 1999 the mortality rate rose sharply and was high enough during the early 2000s to check any further increase in elephant number. There is close agreement between the observed rate of increase after 1995 in the number of fresh or recent carcasses, and the rate of increase in the number of elephants killed annually after 1995 that must be included in a model that mimics the most recent trend in the elephant population.

To keep elephant numbers in the Sebungwe approximately constant at 15,000 (mean of the 1999, 2001 and 2006 estimates) would require 600 elephants to be killed annually, assuming a population growth rate of 4%. These 600 deaths are in addition to natural deaths. For comparison, the observed increase in the number of elephant carcasses between the 2001 and 2006 surveys averaged 373 per year but this figure, which includes natural deaths, makes no allowance for carcasses that decayed or otherwise disappeared.

Elephants have been killed in the Sebungwe for various reasons, including culls, tsetse control, sport hunting, Parks and Wild Life Management Authority staff training and rations, problem animal control, crop protection and illegal hunting (Martin, 1992a). There have been no culls since 1992 and tsetse control operations no longer use game fences or game-free corridors. Sport hunting is unlikely to account for the increased mortality of elephants after 1999 because the number of elephants that sport hunters were licensed to kill annually was constant at 60-70 during 1994-2002 (Grobbelaar & Masulani, 2003). Ivory records account for an average of <100 elephants per year that died in the communal lands between the 2001 and 2006 surveys (O. Ndoro, pers. comm.) and this number includes elephants killed during problem animal control and sport hunting, and

some natural deaths. There are no published data on the numbers shot by Parks and Wild Life Management Authority staff for rations, or staff training. Despite gaps in the data, it is most unlikely that the increase in elephant mortality since 1999 can be accounted for by the legal killing of elephants.

The significant and positive correlation between the elephant mortality rate in the Parks and Wildlife estate and the number of poachers' camps there strongly implies that, at least within the estate, the increase in elephant mortality was due to poaching. A simultaneous increase in the number of domestic cattle illegally in the estate, and the recent presence of cattle-drawn carts (Dunham *et al.*, 2006), suggests that the problem was not just elephant poaching but a wider problem of a lack of law enforcement. Zimbabwe's capacity to provide effective law enforcement in the Parks and Wildlife estate is constrained by small budgets (Cumming & Jones, 2005), often compounded by inappropriate allocations of resources (Attwell & Cotterill, 2000).

That the sharp rises in the mortality rates of elephants in the Parks and Wildlife estate and in the communal lands occurred at different times may suggest different causes. However, the limited records of elephant offtake in the Sebungwe communal lands during 1996-2006 provide no evidence of a major rise in the legal offtake (O. Ndoro, pers. comm.). One could speculate that poaching caused both rises but that extensive poaching started in the communal lands before the 2001 survey and in the Parks and Wildlife estate afterwards.

Conservation implications

That the number of dead elephants within an area can increase significantly without the number of live ones declining may appear counter-intuitive, and could be dismissed as erroneous, especially if survey techniques are not consistent. In the Sebungwe a population that had been increasing was subjected to additional illegal hunting, hence the extra carcasses, which caused the population number to level off. The value of a long-term data set is further emphasized when additional information is collected during surveys so that temporal and spatial trends in the numbers of elephants and other large herbivores can be related to trends in, for example, human density, woodland clearance and domestic livestock (Cumming & Lynam, 1997). The elephant enjoys a high international profile and the Sebungwe surveys were often funded specifically to census elephants: additional data, on other species and the environment, were collected at no extra cost under the financial umbrella of the charismatic study species. The methods used here to determine the long-term trend in elephant number can be extended to these other species and any population censused in a consistent manner for a reasonable period.

In future both the all-carcass ratio and the category 1+2 carcass ratio should be reported for elephant surveys. As an index of the mortality rate the all-carcass ratio can suggest a trend in a population even when survey data are too few or too variable to reveal one (Douglas-Hamilton & Burrill, 1991). But because the all-carcass ratio represents the mortality rate during an unknown period prior to the survey, it reveals only the recent trend, at least in general terms, not necessarily the current trend. The category 1+2 carcass ratio, as an index of the mortality rate during the survey year, is more useful in revealing the current trend. This is well illustrated for the Sebungwe: while the all-carcass ratio was 21% greater during 2001 than during any previous survey, the category 1+2 carcass ratio was 193% greater. The category 1+2 carcass ratio reveals that the rise in the mortality rate of the Sebungwe elephants commenced before 2001, useful information that was inadequately captured by the all-carcass ratio.

Surveys of other elephant populations are needed to determine if the poaching upsurge is confined to the Sebungwe, or a national problem, or a continent-wide problem. Zimbabwe's elephants in north-west Matabeleland and Gonarezhou were last surveyed in 2001 and plans to re-survey them in 2006 were postponed. Zimbabwe's fourth major elephant population, in the unflooded Middle Zambezi Valley, was surveyed during 2005 but the report is still (December 2007) awaited. Media reports that at least some poaching in the Sebungwe is conducted by Zambian nationals suggest that there is an international dimension to the poaching and that it is not simply a local breakdown in law enforcement. That the Sebungwe elephant poaching may be part of a wider problem is also implied by an analysis of the Elephant Trade Information System records of world-wide seizures of illegal ivory, which suggest that the illicit trade in ivory is once again increasing (Milliken *et al.*, 2007). The MIKE programme has yet to report on temporal trends in poaching (CITES, 2004, 2007).

This study provides no support for claims that variations in natural mortality, the inter-calving interval and the age at sexual maturity make significant contributions to the variation in the observed trends in southern African elephant populations (van Aarde & Jackson, 2007). The Sebungwe contains a matrix of land use types, without artificial waterpoints for wildlife or fences to limit dispersal but despite this the variation in the trend of the elephant population since 1980, and before (Cumming, 1981), appears to be mostly due to fluctuations in the level of anthropogenic mortality. Although the Sebungwe population has now been stabilized by this mortality, the overall mean density of

elephants in the protected areas is greater than that which is likely to permit the recovery of woodlands that have been converted to shrublands by elephants (Martin *et al.*, 1989). Zimbabwe's elephant policy calls for elephant density in protected areas to be kept below levels that 'compromise biodiversity' (Department of National Parks & Wild Life Management, undated), in practice <0.75 elephants km^{-2} (D.H.M. Cumming, pers. comm.).

During most of the 1980s elephant number in the Sebungwe was kept approximately constant by culling, with the sale of meat, hides and ivory from culled elephants covering the costs of elephant management. However, there have been no recent culls, partly because the ivory trade ban prevents tusks from culled elephants being sold to offset the costs of management and protection. Although poachers are now limiting the Sebungwe elephant population, the current number (14,000-16,000) is greater than during the 1980s (9,000-11,000). Thus, the advent of the ivory trade ban was followed by an increased density of elephants and presumably by greater impacts on the woody vegetation, already seriously modified by elephants. If there is a continued absence of effective law enforcement, poachers rather than managers may be responsible for reducing elephant density in the Sebungwe to that set by the national policy. It will be ironic if a consequence of the ivory trade ban is more poaching, rather than less.

The credibility of the Sebungwe surveys is confirmed: there is no contradiction between the increase observed during 2006 in the number of dead elephants and the approximately constant population of live elephants. The carcasses represented what would have been an increase in the live population if there had not been additional mortality, mainly due to poaching, after 1999. During the 1990s the number of elephants was increasing but by 2006 the number killed annually was high enough to keep the population number constant.

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Biographical sketch

Kevin Dunham is an independent wildlife biologist based in Zimbabwe. His interests include the management and conservation of large mammals. Since 1999 he has often been a member of the WWF SARPO/ PWMA teams that have conducted elephant surveys in Zimbabwe.

Appendix A maximum likelihood estimator to compare population estimates, complete with variances, to predicted population numbers (adapted with the permission of Rowan Martin, from Martin, 1992b).

The temporal trend in the number of elephants in a model population can be compared with survey estimates of the real population number using Martin's (1992b) maximum likelihood analysis. For each year during which a population is surveyed the analysis compares the population number predicted by the model to the survey estimate. It does this by relating the difference between the predicted and estimated numbers to the variance of the mean estimate of population number.

For each survey year the number of elephants predicted by a model is compared to the survey estimate (Fig. A1). The bell-shaped curve for the normal distribution is represented by the formula for the normal probability density function (Sokal & Rohlf, 1981). There are two parameters in this formula, namely the population mean and the population standard deviation. The population mean is assumed to equal the mean (sample) estimate of the number of elephants, as determined by the survey, and the population standard deviation is assumed to equal the square root of the variance of this sample estimate. The values on the curve corresponding to the predicted number of elephants and the estimated number of elephants are determined (Fig. A1), and the first value divided by the second to give Martin's (1992b) 'relative value'. Martin points out that the relative value is not a true probability but a value that equals one if the predicted and estimated numbers are identical, and declines towards zero as the difference between these two numbers increases.

The product of the relative values for all survey years forms a maximum likelihood estimator that equals one if the predicted and estimated numbers are identical during all survey years, and declines towards zero the less perfect the fit between the predicted and estimated population numbers. For convenience, the product is multiplied by 1,000 to give the 'index value'.

The analysis is performed by running several models (for example, models with different combinations of a starting population number and a population growth rate), and determining which model gives the greatest value for this index value. This is the model that provides the best fit to the survey estimates.

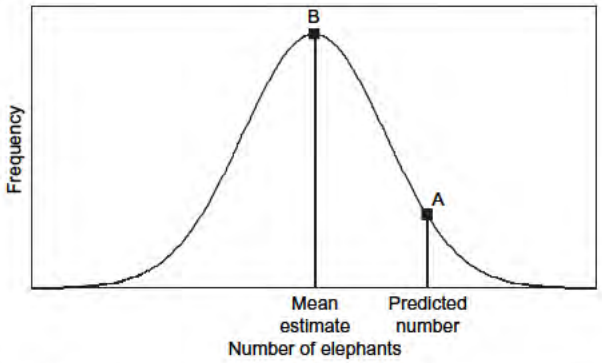

Fig. A1 An illustration of how the number of elephants predicted by a model was compared to that year's survey estimate of elephant number, using Martin's (1992b) 'relative value'. The bell shaped curve for a normal distribution (shown) is represented by the formula for the normal probability density function. In this formula, the population mean is taken to be the mean (sample) estimate of the number of elephants, as determined by the survey; and the population standard deviation is taken to be the square root of the variance of this sample estimate. The vertical lines indicate the values on the curve that correspond to the number of elephants predicted by the model (value A) and the estimated number of elephants (value B). Martin's 'relative value' A/B. This relative value equals one if the predicted and estimated numbers are identical and declines towards zero as the difference between them increases.

- 2014 aerial survey reports, including details on how the surveys were conducted (i.e., methodology) and coverage, including maps of elephant observations, herd size and distribution, carcass observations, and distribution.
- Any additional data on carcasses, including carcass class and proportion of illegally killed elephants [PIKE].
- Any demographic analysis of populations by site (e.g., sex and age class, population histograms, projected growth rates).

3. Poaching levels and prevention

Without adequate control of poaching, even a well-managed elephant management program may fail to meet established goals of population levels and densities. Specifically, we request:

- A table summarizing MIKE and PIKE information from the major populations in Zimbabwe, since recording started in 1999.
- National policies to address poaching.
- Actions taken by the Zimbabwe government to protect wildlife, prevent poaching and punish criminals of wildlife crimes. This should include:
    - Anti-poaching manpower and budget for anti-poaching in protected areas overseen by ZPWMA.
    - Summary of serious wildlife crime cases in recent years (i.e., arrests, outcome of trials, sentences).

4. Regulations and Enforcement

While we have received detailed information from a few areas or programs operating within Zimbabwe, we do not have adequate information on the overall picture at the national level. In particular we seek information on how much money is generated by U.S. hunters through elephant hunting, how these funds are distributed, and how these funds impact the ability of ZPWMA to adequately enforce the Parks and Wild Life Act, day-to-day management, or anti-poaching efforts. Specifically, the following would assist us:

- The current operating budget for ZPWMA, including sources of funding (e.g., allocated by Parliament, obtained through hunting permits or concessions, park fees, donations, etc.).
- The amount of revenue generated from elephant hunting by U.S. hunters and how those funds are distributed?

5. Sustainable Use

To date, we have not received adequate information regarding offtake in Zimbabwe, including basic fundamental information like the number of elephants killed annually, both legally and illegally. According to ZPWMA, categories of offtake are:

- Sport-hunting by trophy hunters,
- Cropping (culling and population control, which may include meat supply to rural communities and elephants shot for the skin trade),
- Live animal capture and sale,
- Natural Mortality (found dead of natural causes),
- Accidents (killed by trains, landmines, or vehicles),
- Poaching (illegal take),

- Problem Animals (elephants killed to protect human life and property), and
- Management Offtake (offtake due to other management decisions).

Please provide:

- The number of elephants taken per year in each of these categories.
- Details on how the number of elephants to be hunted in each area is decided (i.e., quota setting).

6. Revenue Utilization

We understand from our own research and information provided to us that hunting in Zimbabwe occurs on the following land uses: Communal Lands (under CAMPFIRE), and on Safari Areas, Forest Estates, and on Private Conservancies (under the supervision of ZPWMA).

- Please provide information on: elephant populations on the four aforementioned land types, the number of elephants hunted on each land type, and the fees paid or the revenues earned for elephant hunts on each land type.

- For each of the land uses on which elephant hunting occurs, please provide the total number of elephant hunts, the total revenue, and a summary for each type of management on how the revenues are spent.

I truly appreciate any further assistance and information you and the ZPWMA can provide to further fill the information gaps. If it would be of assistance in meeting this shared goal, I would be happy to send key Service personnel to Zimbabwe to meet with you or relevant staff to discuss these issues further.

It is the Service's position that U.S. hunters can play a constructive role in the conservation of the African elephant. While the United States has specific stricter domestic measures that require additional findings beyond those required for the issuance of an export permit by your country, we recognize that scientifically based management programs and close monitoring and control of hunting alongside an effective anti-poaching program can allow U.S. hunters to provide a significant benefit to African elephant conservation.

We look forward to working with you to gather additional information and determine whether our legal threshold can be met. If you have any questions, please feel free to contact me at +1 202 208 6394 or by e-mail at Bryan_Arroyo@fws.gov.

Sincerely,

Bryan Arroyo
Assistant Director – International Affairs

Subject: SEBUNGWE ELEPHANT MANAGEMENT ACTION PLAN WORKSHOP
From: "John J. Jackson, III" <cf@conservationforce.org>
Date: 5/14/2015 9:12 AM
To: undisclosed-recipients:;
BCC: Tim Vannorman <Tim_Vannorman@fws.gov>, Bryan Arroyo - FWS <bryan_arroyo@fws.gov>, Dan Ashe <dan_ashe@fws.gov>, Rosemarie Gnam <Rosemarie_Gnam@fws.gov>, Shane Mahoney <conservationvisions@gmail.com>, Chrissie Jackson <cjackson@conservationforce.org>, Philippe Chardonnet <p.chardonnet@fondation-igf.fr>, "Damm, Gerhard" <gerhard@muskwa.co.za>, Dale Toweill <dtoweill@gmail.com>, Bert Klineburger <bklineburger@gmail.com>, John Thodos <johnthodos@gmail.com>, bill brewster <bbrewster@caphillgrp.com>, Ralph Cunningham <ralphscunn@aol.com>, Mike Branham <mwbranham@gmail.com>, Lori Clem <Lori@toothacres.com>, Alan Sackman <a.sackman@sackman.com>, James Mitchell <jamesfrancis7277@aol.com>, Wes Bates <wcbates@steemer.com>, Michael Condon <mjc3030@aol.com>, CMS <admin1@cmsafaris.com>, Tharia Unwin - Johan Calitz Safaris <jachunt@mweb.co.za>, Scott O'Grady <zuluf16@gmail.com>, Tom Murphy <tomocean851@cox.net>, jc hurt <jchmidland@gmail.com>, John Barth <john@ausafari.com>, Michael Kreig <mkreig@ghcci.com>, Joas Makwati <j-makwati@gmail.com>, Mike Angelides <mikeangelides@hotmail.com>, Terry Patrick <tartansailor1@gmail.com>, Mike Murray <mike@murrayranches.co.za>, Alistair Pole <alistairpole@gmail.com>, Wilfried Pabst <wp@pabstholding.co.za>, Jeff Rann <jeffrann@yahoo.com>, Eric Pasanisi <ericpasanisi@hotmail.com>, Pete Fick <petefick@gatorzw.com>, George Harms <gharms@ghcci.com>, CAMPFIRE - Charles Jonga <cjonga@campfirezimbabwe.org>, Gary Ingersoll <gingersoll@pdq.net>, Pete De Villiers <hunterssa@mweb.co.za>, Troy Link <troy@jacklinks.com>, Steve Wagner <steve@blueheroncomm.com>, David Cumming <cummingdhm@gmail.com>, Bruce Rice <brucer@eip.net>, Zig Mackintosh <studio@ospreyfilming.com>, Jeff Smithers <jsmithers@smithersconstruction.com>, Bob Sakuta <BobS@delrecorp.com>, Greg Murtland <gmurt@turbinetoolandgage.com>, 'Kevin Atkinson' <atkinsonk123@gmail.com>, Audrey Murtland <Audrey@turbinetoolandgage.com>, Duane Corley <dtcorleylaw@yahoo.com>, "bardtexas@aol.com" <bardtexas@aol.com>, Clive Stockil <clives@senuko.com>, Coenraad Vermaak <cmv@cvsafaris.co.za>, John Odum <johnodum@comcast.net>, Marco Pani <pani.marco@gmail.com>, Peter Lindsey <palindsey@gmail.com>, Ken Stansell <Ken@Kennethstansell.com>, Dave Fulson <davefulson@mac.com>, Rolf Baldus <baldustravel@hotmail.com>, Rolf Baldus <rolfbaldus@t-online.de>, Mike Nice <mnice@sbcglobal.net>, Donald MacLauchlan <maclauchland@gmail.com>, Glenn LeMunyon <glenn@lemunyongroup.com>, Jay Koetsier <jaykoetsier@gmail.com>, "Capozza, Richard R." <RCapozza@hblaw.com>, Scott Petty <spetty@pettyco.com>, Happy <wrogers3@gmail.com>, Stephanie Coulter <stephanie.coulter@conservationforce.org>, Regina Lennox <regina.lennox@conservationforce.org>, Brad Fitzpatrick <bfitzoutdoors@gmail.com>, Louis Muller <louis@pro-saf.com>, "'SOAZ, Sally Bown'" <soaz@mweb.co.zw>, Bob Sakuta <BobS@delrecorp.com>, "Ozer, Howard" <ozer@uic.edu>, Norman Donati

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FYI - Workshop Fact Sheet

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Attachments:

Workshop_organisation statement.doc 458 KB

ZIMBABWE PARKS AND WILDLIFE MANAGEMENT AUTHORITY
SEBUNGWE ELEPHANT MANAGEMENT ACTION PLAN WORKSHOP

FACTS ABOUT THE WORKSHOP ORGANISATION

The workshop is led by Zimbabwe Parks and Wildlife Management Authority

The workshop has been funded by:

- **CONSERVATION FORCE**
- **PADENGA HOLDINGS**

The workshop has been voluntarily organized by:

- TASHINGA INITIATIVE
- ZAMBEZI SOCIETY

The workshop is being hosted at a considerably reduced rate by Musango Safari Camp, Lake Kariba.

Mr John J Jackson III of Conservation Force asked for the following requirements to be met through his donation:

- That the workshop financially supports the participation by members of ZPWMA, ZRP, Prosecutors Office, Chiefs, CAMPFIRE, Community RDC_CEOs, Universities.

- That Participants from all NGO's, trusts, charitable organisations, antipoaching units, safari operators: consumptive and non-consumptive, technical experts, wildlife consultants, and others, be asked to meet all the charges themselves. This includes TI and ZS.

The charges are: USD85.00 per day if staying at Musango
USD70.00 per day for the workshop, if staying elsewhere

Any objections, kindly speak to Mr Marco Pani, Conservation Force who will take your enquiries.

Lynne Taylor
Tashinga Initiative on behalf of Conservation Force

Subject: Dande Anti-Poaching Unit (DAPU) Report
From: "John J. Jackson, III" <cf@conservationforce.org>
Date: 6/15/2015 2:07 PM
To: Tim Vannorman <Tim_Vannorman@fws.gov>, Bryan Arroyo - FWS <bryan_arroyo@fws.gov>, Dan Ashe <dan_ashe@fws.gov>, Rosemarie Gnam <Rosemarie_Gnam@fws.gov>

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Attachments:

DAPU First quarter newsletter 2015.pdf 159 KB

DAPU

DANDE ANTI POACHING UNIT

First quarter newsletter 2015

Dear Friends,

Thank you so much for your support thus far. DAPU has gotten off to a good start in 2015.

Changes

Bongi, who has had so much success in the East, has now been promoted to manage DAPU in the North. Muno has been promoted from Mukanga camp manager to manager of the East (Bongi's old job). These changes have really given all DAPU staff a fresh perspective and even more motivation than ever.

For the 22 scouts after a long negotiation with community leaders, we now deduct the community's share of the wages at source (CMS pays and deducts from hunts owed) so now finally all staff are fully paid up. We also negotiated that we be allowed to move scouts between areas or wards meaning from now on it will be seldom that a DAPU scout will be patrolling his home area. This makes for much more honest policing as he or she are now not required to arrest family members and also it means on their time off they do not get harassed.

Snaring & general poaching.

December, January and February were hectic months for snaring mostly because it is our "off season" along with the fact that locals can only expect to harvest crops in March so are getting hungry. Figures over the last couple years definitely point to the fact that PH's and clients whilst out hunting are still some of the best scouts available i.e. in peak hunting months poaching is way down!!! March and April snare counts have come down to the normal +/-200 per month range.
Very heavy rain in January washed away most riverbank crops so genuine hunger has compounded things.
Three sables were poached in the East – suspects were arrested but released due to lack of evidence.

Elephant poaching.

To date three elephant carcasses have been reported – poached in the "off season". One young bull was also destroyed – he had been wounded by poachers.

Problem Animal Control.

Duties for DAPU scouts also include attending to Problem animal reports (PAC).

a. Elephant -

As always the wet season is peak time for elephants to raid crops and 2015 has been no exception. Luckily aggressive chasing at night has meant to date that we have not had to shoot any elephants.

b. Lions – the same cattle killing pride of lions has continued in to 2015. National Parks were able to shoot one young male in the East. Two females remain in that pride and are killing on average two cattle per week in the Gonono area.

In Kanyemba a 14-year-old girl was killed and eaten by lions. We expect more problems from them. That same pride has killed 6 people 2010 to date.

c. Buffalo – one dagga boy has been chasing kids en route to school in the Pedza village area.

d. Crocs – one child lost his arm on the Manyame River.

e. Snake bites – two people killed in their fields.

Goals for Second quarter.

1. *Continue with anti poaching patrols.*
2. *Replace scouts that are not performing.*
3. *Early burning will start in June as soon as it is dry enough.*
4. *Repair firearms where possible or replace*
5. *Replenish ammunition stocks.*
6. *New boots.*
7. *New Uniforms.*
8. *New (better quality) tents.*
9. *Three new GPS's (coming with Mike Core).*

All the very best and thank you to all of you whom have helped make DAPU possible!

Buzz and Myles.

Income and Expenses first quarter 2015

Income

Clients & Sylvarnus trust	**US$17,167**
CMS	**US$10,781**

Expenses	**Scouts**	**Management (Bongi & Muno)**	**Rations**	**Rewards**	**Total**
January	US$1,100	US$1,400	US$770	US$1,518	US$4,788
February	US$1,100	US$1,400	US$770	US$908	US$4,178
March	US$1,100	US$1,400	US$770	US$336	US$3,606
April	US$1,100	US$1,400	US$770	US$756	US$4,026
Backpacks x 18 $75 ea.	US$0	US$0	US$0	US$0	US$1,350
Mileage x $.5/km	US$0	US$0	US$0	US$0	US$10,000
Totals	**US$3,300**	**US$5,600**	**US$2,310**	**US$2,762**	**US$27,948**

Shortfal **US$0**

*** Notes

1. Two dedicated vehicles at an average of 2500km's ea. /month x $.5/KM.

Summary of successes first quarter 2015.

	No. Of Snares	Dogs Shot	Meat poachers Convicted	Elephant poachers Convicted	Weapons retrieved	Rewards Paid
January	309	0	5	0	0	US$1,518
Febraury	454	0	0	0	0	US$908
March	168	1	1	0	0	US$336
April	210	1	1	0	0	US$756
	1141	**2**	**7**	**0**	**0**	**US$3,518**

ZIMBABWE PARKS AND WILDLIFE MANAGEMENT AUTHORITY

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20 July 2015

The Director International Affairs
United States Fish and Wildlife Service
Washington, DC 20240
USA

Attention: Mr. Bryan Arroyo

RE: ELEPHANT CONSERVATION IN ZIMBABWE

With reference to your letter dated 12 May 2015 please find attached a response to the questions you raised on the conservation of the African elephant in Zimbabwe. We hope that the information provided will contribute towards a positive enhancement finding by the United States Fish and Wildlife Service (USFWS).

With regards to your offer to send USFWS personnel to Zimbabwe, we welcome such a visit and look forward to closer cooperation.

The Government of Zimbabwe avails itself of this opportunity to renew to the Government of the United States of America the assurances of its highest consideration.

Hon. O. Muchinguri-Kashiri

MINISTER OF ENVIRONMENT, WATER AND CLIMATE

Board of Directors: Mr Alvin D. Ncube (Board Chairman), Prof. Gilbert Pwiti, Rtd Air Marshal Henry Muchena, Ms Nellie R.F.T Jinjika, Mr Wilson Mutinhima, Mr Tichafa E. Mundangepfupfu, Mr T Mundoga, Mr E Chidziya (Ex Officio)

RESPONSE TO THE UNITED STATES DEPARTMENT OF THE INTERIOR

FISH AND WILDLIFE SERVICE (USFWS)

JULY 2015

BACKGROUND TO ELEPHANT MANAGEMENT IN ZIMBABWE

Zimbabwe has a proud history of successful elephant conservation, and is one of the key elephant range states and home to the second largest remaining elephant population after Botswana. The population estimate from the 2014 aerial survey stands at 82,092 elephants.

In the early 1900s the elephant population in Zimbabwe was estimated to be about 4,000. By 1980 the population had increased to an estimate of 46 426 elephants. The population continued to increase and in 1993 it was 58,185, in 2001 it was 88,123. A twenty fold increase in elephant populations was observed from the early 1900 to 2001. This increase was noted despite attempts to limit elephant population growth between 1960 and 1989 through culling exercises in tsetse control areas and state protected areas.

The number of elephants taken off during this period was approximately 45,000elephants. The primary rationale for limiting elephant numbers in protected areas was to reduce their impact on woodland habitats and the loss of plant and animal species as a result of elephant induced habitat change. Between 1990 and 2006 elephant populations grew exponentially but growth has since been limited by an escalation of illegal killing among other factors. The elephant population estimate between 2001 and 2014 has experienced a statistically insignificant change from an estimate of 88,123 to 82,092 elephants.

The human population has also increased twenty-fold between 1900 and 2000, resulting in increased demand for land for agriculture and other forms of land-use outside protected areas thereby limiting the area available for elephants with a resultant increase in human elephant conflict.

The high elephant population in some protected areas has resulted in ecological problems associated with localized overabundance which include: conversion of woodlands to scrubland and grasslands, and decrease in species diversity of both flora and fauna. Recent studies indicate that elephant densities that are as low as 0.27 elephants per km^2, elephants will convert the woodland into coppice in 120 years due to the massive declines of large trees (Mapaure, 2013). The same result is achieved in 10 years if the density is at 2 elephants per km^2; however other factors such as fire also have a huge influence on woodlands. It is generally accepted that the elephant density that can allow for the recovery of woody species is 0.5 elephant per km^2 in less than 100 years.

Zimbabwe subscribes to the principle of sustainable utilization of all wildlife resources including elephants. Sport hunting is the principal form of wildlife utilization whereby off takes are adaptively managed and monitored through a participatory and science based process. This process allows for sustainable off takes, and rigorous resource monitoring programmes that allow recruitment within a population to ensure the continued survival of the population in the wild. The high economic value conferred to the elephant through consumptive utilization has also resulted in increased tolerance by local communities.

1. Management Plan

What is Zimbabwe's target elephant population, both nationally and by sub-regions (e.g., how many individuals and/or populations or what percentage of land with elephants)?

Zimbabwe's major elephant range which is the basis for all national surveys is 67,898km^{2}covering approximately17% of the country's total land area. The major elephant range comprises of South East Lowveld (10,409km^2), Sebungwe (15,527km^2) North West Matabeleland (24,959km^2) and Zambezi Valley (17,003km^2) as shown in Figure 1 below.

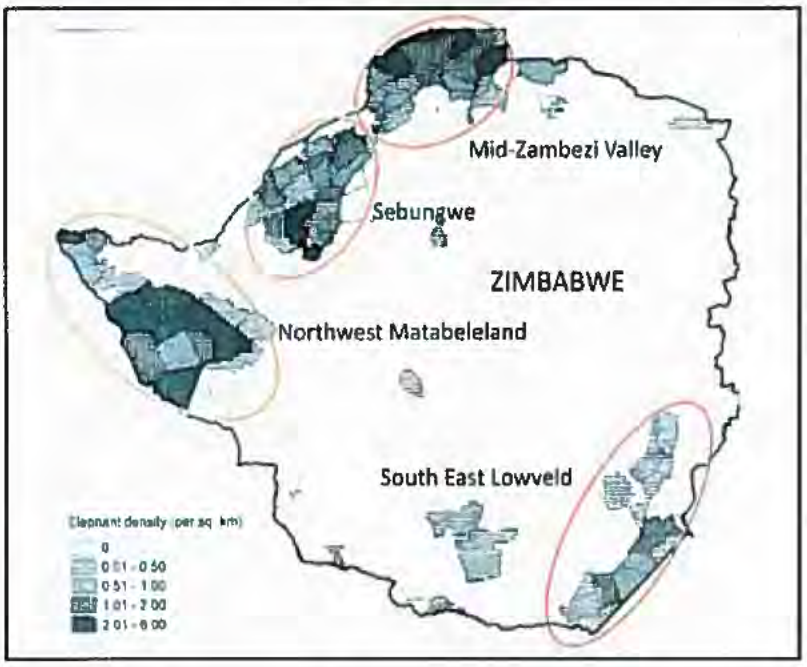


Figure 1.Distribution of the four major and minor elephant ranges in Zimbabwe.

The range covers all land categories which include protected areas, private, forest and some communal lands. The map above shows the four major elephant range in Zimbabwe. According to the 2014 National Elephant population aerial survey, Northwest Matabeleland had the highest population of elephants (53,991) followed by South East Lowveld (13,037), Zambezi Valley (11,657) and Sebungwe (3,407).

As discussed below, ZPWMA has set a preferred density, but most of the ranges already exceed this density at varying degrees. As such it has become apparent to develop range based Elephant Conservation plans to factor in the special variations in management interventions required for

each range area. Accordingly, population targets for each major range, which take into account the preferred density and other factors, have been or will be set at participatory workshops for each area. Generally, Zimbabwe's target is to maintain essentially the same range (or perhaps expand the range), which is at least 17% of land as elephant habitat.

At the strategic level the in the Elephant Conservation and Management Plan the following three targets are outlined:

- To maintain at least four demographically and genetically viable elephant populations in Zimbabwe
- To maintain or increase the elephant range in Zimbabwe
- To maintain numbers /densities of elephant at levels that do not adversely impact on biodiversity conservation goals while contributing to economically viable and sustainable land uses

At an operational level the following targets have been set following a series of workshops to develop sub-regional action plans:

A target of 5,000 elephants has been set as a minimum viable population (MVP) for the Sebungwe region. The 2014 aerial surveys established a population estimate of 3,407elephants in approximately 7,000km^2 of available habitat. The objectives for the sub-region therefore are to increase the elephant population to international standards for minimum viable elephant populations. This target was set during the Sebungwe Elephant Management Plan Workshop held at the Musango Safari Camp in May 2015.

The MVP is the population size that is required for a high probability of survival of a population over a given period of time. The MVP is the minimum population size that is considered large enough to avoid inbreeding depression, with sufficient genetic diversity for adaptive change to occur and large enough to avoid new deleterious mutations to occur. The MVP however is also largely depends on habitat quality, law enforcement effort, social factors and other key variables including stochastic events therefore is cautiously used as a target.

For the remaining 3 regions namely North West Matabeleland, Zambezi Valley and South East Lowveld target populations will be developed through participatory Elephant Management Planning Workshops. A workshop for Mana Pools National Park / Zambezi Valley was held 30 March – 2 April 2015 while that for South East Lowveld is scheduled for to run between 2nd and 4th of September 2015. Workshops for the other ranges are in final planning stages and the dates will be announced once they have been finalized.

- One of the major targets at the strategic level is to maintain the elephant range at the 1996 level through enforcement of legislation

- To increase the range and habitat availability for elephants through initiatives such as Trans-frontier Conservation Areas which include Great Limpopo Transfrontier Park (GLTP) / Great Limpopo Transfrontier Conservation Area (GLTFCA); Kavango-Zambezi (KAZA) TFCA; Lower Zambezi-Mana Pools LZMP (TFCA) and Zimbabwe-Mozambique-Zambia (ZIMOZA) TFCAs. In addition to the TFCAs new conservancies have been formed thus increasing the size of the range available to elephants.
- To increase connectivity between sub-populations through the creation of wildlife migration corridors such as Hwange Sanyati Biological corridor project linking North West Matabeleland and Sebungwe.

A copy of Draft Zimbabwe's Elephant Conservation and Management Plan will be provided shortly. Certain Key Activities, Key Performance Indicators (KPIs), and Means of Verifying KPIs have been included here in response to questions.

How have these targets been set (e.g., ecological carrying capacity estimate, historic numbers)?

The target for Sebungwe has been set using the MVP size of 5,000 elephants which is considered genetically viable internationally (Armbruster andLande1993). In setting the MVP target for Sebungwe, population viability analyses and simulation models to predict the impacts of elephants on habitat among other variables as well as thorough analyses of habitat quality and other factors were used.

The targets for the following sub regions North West Matabeleland, Zambezi Valley and the South East Lowveld will be set using preferred densities and ecological carrying capacity, geographical distribution and habitat connectivity, and also take into account historic numbers and the economic viability for wildlife based tourism as well as genetically viability. It should be noted that Zimbabwe's elephant population exceeds preferred densities in every range except Sebungwe, but preferred density is only one factor among many taken into account.

Within the framework of the National Elephant Conservation and Management Plan, the setting of targets is incorporated the setting of targets is incorporated under each of the five key components as shown in the table1below:

Table 1. Strategic Objectives in Elephant Management Plans

Key Component	Strategic Objective
Protection & law enforcement	Ensure effective protection of all population of elephant in Zimbabwe
Biological monitoring & management	Implement effective biological, ecological management to achieve populations that are within upper and lower acceptable limits to change in numbers and distribution
Social, economic & cultural framework	Implement strategies that enhance the contribution of elephants to rural livelihoods and national development
Building conservation capacity	Ensure that sufficiently and appropriately trained personnel, equipment, infrastructure and financing are mobilized, available and used efficiently and effectively
Coordination, collaboration& programme management	Ensure effective coordination and collaboration with national and international stakeholders

Under biological monitoring and management, "targets will be set based on results of extensive long term monitoring as well as on-going research on elephant-vegetation dynamics. Thresholds of potential concern will be established, spatial data on geographical distribution mapped and wildlife based land uses promoted in connectivity areas and biological corridors."

Due to the high elephant population in some protected areas, localized over-abundance and associated problems are being experienced, for example the threat to *Colophospermum mopane*. In some areas human population growth and settlements in buffer zones has led to elephant population compression in protected areas, which poses a high risk to woodland persistence. However, the Zimbabwe Parks and Wildlife Management Authority (ZPWMA or the Authority) seeks to balance protection of biodiversity and woodland cover with concerns over the declining elephant populations in some countries and international focus on the elephant as a species under severe threat from poaching. Accordingly, ZPWMA would prefer to maintain a density of 0.5 or 0.25 elephant per sq. km. Density levels are however determined at a local level in accordance with the objectives of the Park or habitat area. Whilst there are no formulas to determine definite density levels to maintain biodiversity, available literature, (G. C, Craig unpublished, 1997) suggest that tree canopy cover only exceeds 50% at elephant densities of between of between 0.1 – 0.5 per sq.km. As such, a precautionary principle, Zimbabwe would want to maintain elephant densities within the afore-mentioned acceptable levels. However, variation to this exists where tourism objectives have been met and public opinion is saying otherwise (e.g. the international lobby against culling)

While the Sebungwe Action Plan is ready and one for the Zambezi Valley is being drafted, there are two regional stakeholder workshops in advanced stages of planning, for North West Matabeleland and South East Lowveld. These workshops will set targets for the sub-regional populations as well as measurable action items and indicators.

However, ZPWMA seeks to balance protection of biodiversity and woodland cover with concerns over the declining elephant populations in some countries and international focus on elephant as a species under severe threat from poaching and human encroachment.

How are current human settlements, as well as anticipated growth of these settlements, factored into these targets?

It should be borne in mind that the human population of Zimbabwe also increased twenty-fold between 1900 and 2000, with the result the range available to elephants accordingly under increasing threat. Zimbabwe's human population growth has led to increasing demand for agricultural land especially in the Sebungwe region thus putting pressure on some previously unsettled areas mainly in the Sebungwe Region. For this area the target population has been set at the minimum viable population level of 5,000 elephants.

There is currently effort through the Hwange-Sanyati Biological Corridor project to sustain movement of wildlife through from North-West Matabeleland (areas with high elephant densities) to the Sebungwe Region. This is envisaged to ensure the free movement of elephants, reducing some of the population pressures in North-West Matabeleland while populating the Sebungwe region to the targeted minimum sustainable population level of 5,000 elephants.

Current human settlements as well as anticipated growth of these settlements have been factored in the Action Plan for Elephant Conservation and Management in Zimbabwe through various initiatives which include increasing habitat connectivity. In some populations such as North-West Matabeleland the TFCA concept is being implemented to ensure connectivity of range areas at the national level with neighbouring Range States (Botswana, Zambia, Namibia and Angola). TFCA initiatives like the Great Limpopo Transfrontier Park (GLTP) / Great Limpopo Transfrontier Conservation Area (GLTFCA); Kavango-Zambezi (KAZA) TFCA; Lower Zambezi-Mana Pools LZMP (TFCA) and Zimbabwe-Mozambique-Zambia (ZIMOZA) TFCAs help in maintaining a demographically and genetically viable population, creating landscapes for ecosystem processes suitable for elephants. There is a lot of research work being undertaken by ZPWMA researchers in collaboration with external researchers on elephant population dynamics, spatial distribution, impacts on vegetation and human wildlife conflict, etc. The research outputs have been published in peer reviewed international journals.

In areas where the human population has grown substantially, sustainable livelihood options are currently being explored so as to diversify income from wildlife, thus sustaining a wildlife based land-use which is critical in sustaining Wildlife Areas. Currently the Government is reviewing

the CAMPFIRE concept so as to present it as an efficient Community Based Natural Resources Management program. This is envisaged to ensure sustainable coexistence's-management of wildlife resources is vitally important as it instils value attachment to wildlife and hence increases its protection by communities.

Maintaining the integrity of protected areas in the range through enforcement of legislation is another way the targets are being met. The country is enforcing legislation that prevents human settlements within the state protected areas which form the bulk of the National Elephant Range. Zimbabwe is also a signatory to Regional and International legal and policy frameworks that enhance cooperation in curbing wildlife crimes across borders such as Interpol. Also within the protected areas any proposed developments that occur are supposed to have Environmental Impact Assessments to determine the effect of any such proposed developments will have on the environment and the biological resource. These measures as well as anticipated growth of settlements are factored into the targets in the Action Plan for Elephant Conservation and Management in Zimbabwe.

The implementation of integrated land-use planning as well as the review of the CAMPFIRE model will promote the development of buffer zones between the protected areas and human settlements. These buffer zones will have minimal developments and will be used as wildlife areas. Monitoring plans as well as regular assessment through land use planning will be used to ensure that buffer zones and biological corridors are maintained. Development of joint management plans and joint implementation of activity plans at the local level are factored into the development of targets.

Targets to ensure that viable elephant populations, geographical distribution and habitat connectivity are achieved and maintained are included in the Action Plan. Wildlife based land use systems as well as the promotion of the establishment of community conservancies are among the activities for areas within the elephant range with high human population densities and human settlements. Anticipated growth of human settlements factored into the targets through implementation of integrated land use planning.

In areas where human populations have grown substantially, sustainable livelihood options are currently being explored so as to diversify income from wildlife, thus sustaining a wildlife based land-use which is critical in sustaining Wildlife Areas. Currently Zimbabwe is reviewing the CAMPFIRE concept so as to present it as an efficient Community Based Natural Resources Management program. This is envisaged to ensure sustainable coexistence.

What mechanisms will be utilized to reach these targets?

The mechanisms that will be utilized to reach the targets include key activities that will be implemented in order to achieve the desired outputs in the Action Plan for Elephant Conservation and Management in Zimbabwe. The activities under each component are outlined below:

Protection and law enforcement:

- For each key population establish a highly trained rapid response anti-poaching unit for deployment to areas under threat
- Enhance international and trans-boundary collaboration in law enforcement
- Enhance social (community) involvement in law enforcement
- Reduce illegal settlements
- Revisit the appointment of Honorary Officers to assist in law enforcement
- Ensure full compliance with hunting regulations and quotas set
- Adopt, adapt and apply new technology (including aerial) for area surveillance
- Appropriate informer systems established
- Improve investigation and prosecution of crimes
- Set up national and local intelligence databases

Biological monitoring and management:

- Monitor elephant population trends and elephant impacts on biodiversity through aerial, ground and ranger-based methods, among others
- Use research findings, expert opinion and informed public opinion to establish thresholds of potential concern (TPCs) to initiate management action in respect of elephant impacts for protected areas
- Monitor trophy quality and adjust quotas to maintain desired levels of trophy quality
- Carry out appropriate management actions when populations exceed TPCs
- Monitor trophy quality and adjust quotas to maintain desired levels of trophy quality
- Define current elephant range and explore options for extending range and maintaining connectivity
- Recognizing the long response time of elephants to management interventions, use modelling to project alternative outcomes or scenarios of management

Social, economic and cultural:

- Facilitate the transparent distribution of the benefits and costs of elephant management and conservation
- Implement effective techniques and land-use strategies to mitigate human-elephant conflict.
- Develop and implement an effective communication strategy for local, regional and international audiences
- Provide incentives and promote partnerships and joint venture opportunities
- Explore additional elephant-based tourism and sustainable utilization opportunities
- Information on elephants and their conservation in academic institutions
- [Further develop sustainable use opportunities for elephant]

Building conservation capacity:

- Secure funding to initiate the implementation of the elephant management plan
- Establish sustainable funding programs to build and maintain necessary human resources and strengthen elephant conservation and management capacity
- Strive to achieve best standards for elephant management, including any forms of utilization
- Engage available expertise and capacity within Zimbabwe
- Unlock value in elephants and their products
- Analyse current capacity and identify needs
- Initiate and/or maintain continuity in research and monitoring
- Strengthen research capacity in ZPWMA
- Establish training and in-service retraining

Coordination and collaboration:

- Establish a national elephant conservation and management taskforce/steering committee that includes stakeholders meetings at least bi-annually to review progress and to develop an annual implementation plan
- Complete regional planning and population target setting
- Establish four regional management committees to meet at least twice each year and implement regional plans
- Strengthen coordination between the hunting industry and the elephant

management program

- Implement an effective information dissemination and communication strategy, including regular progress reports on the implementation of the plan
- Strengthen links with neighbouring states to confer on the management of shared elephant populations
- Establish a full-time elephant manager

What monitoring will be conducted to measure progress toward these targets?

Monitoring is being and will be performed through Key Performance Indicators (KPIs) and means of verification. These indicators are included in the draft framework developed at the National Elephant Conservation and Management Planning workshop and will be included in the final National Elephant Management Action Plan, which will be made available shortly.

Monitoring and analysis of data from surveys such as water hole censuses, road strip counts and aerial surveys expected to be conducted in 2017, if funds permit, ranger-based monitoring and reporting of carcasses and carcass trend analysis; tracking of anti-poaching efforts and prosecutions; tracking of land resettlements or removal of illegal settlements.

Monitoring to measure progress towards the targets will be conducted through consideration of the following:

Protection and law enforcement

- Reports on results of law enforcement effort in various categories recorded at field stations, conservancies, and CAMPFIRE District Offices, compiled at regional and national levels and presented to the Regional and National Coordinating Committees (R&NCC) bi-annually
- Reports on Hunting regulation infringements derived from SOAZ/ZPHGA reports and from field station reports compiled and presented to R&NCC
- Consolidated record of number of field personnel and days operational (law enforcement, research &monitoring, elephant management) for each area in the elephant range compiled and reported on at annual planning meetings
- Research reports and papers on elephant conservation and management
- Training on new technologies
- Legislation (e.g. tracking illegal financial flow sand deterrent sentences)

Biological monitoring and management

- Reports on elephant surveys
- Elephant distribution maps
- Database on elephant mortality
- Assessment report on Thresholds of Potential Concern in elephant ranges
- Report on trophy quality trends
- Reports to international monitoring systems as required (e.g.AED,ETISand MIKE)
- Reports and maps of active corridors.
- Report on trend in trophy quality
- Hunting as a management tool (dispersal/containment)
- Capture and translocation
- Fire management protecting elephant habitats

Social, economic and cultural

- Record of beneficiaries and benefits availed
- Report on costs associated with elephant censuses, protection outside protected areas
- Database on HEC
- Documented policies and list of operating partnerships/joint ventures that promote elephant conservation and management
- Record of investments in elephant conservation measures assembled by elephant program manager/coordinator
- Records and annual summary of arrests and poaching incidents intercepted based on leads provided by communities
- Hunting/live sales to generate revenue incentivize, HEC

Building conservation capacity

- Record of funds available (USD) and investment by ZPWMA, Private sector, NGOS, and CAMPFIRE in elephant conservation measures (Compiled annually by the Authority's Elephant Manager/Coordinator)
- Record of funds generated from elephants and their products

Coordination and collaboration

- Record of meetings, minutes, actions completed, attendance at national and regional committee meetings
- Record of when minutes of meetings were completed and circulated
- Record of reports by the person in the elephant management position

What actions are authorized to ensure progress towards these targets?

The government of Zimbabwe has developed and institutionalized pieces of legislation and is party to regional and international conservation initiatives to ensure effective biodiversity conservation. Actions that are authorized to ensure progress towards these targets are summarised in Table 2below;

Table 2: Actions authorized to ensure elephant population protection

Authorised action	**Enabling legislation, policy and treaties**
Protection and law enforcement Protection and law enforcement regarding wildlife and habitats is augmented by a rigorous array of legislative instruments.	• Parks and Wildlife Act 1996(amended) • Criminal Law Codification and Reform of 2013Act Chapter 19:23 • Protection of Wildlife (Indemnity) Act of1999 Chapter 20:15 • Environmental Management Act of 2002 Chapter 20:27 • Statutory Instrument 26 of 1998 • The Parks and Wild Life General Laws Amendment number 5 of 2011 • Statutory Instrument 45 of 2014 • Parks and Wildlife Management Authority (Tariff of Fees) By-laws, 2015 • Elephant Conservation and Management Action Plan, 2015 -2020 (Draft) • Sebungwe Region Elephant Management Plan, 2015 to

	2020 (Draft) • Environmental Management Act of 2002, Chapter 20:20 • Forestry Act Chapter of 1990, Chapter 19:05 • Statutory Instrument 57 of 2012 Parks and Wildlife (Payment for Trapping of Wild Animals) Notice, 2012 • Statutory Instrument 56 of 2012 Parks and Wildlife (Payment for hunting of animals) Notice, 2012 • Firearms Act • The Customs and Excise Act • Urgent Measures (African Elephant Summit on 2- 4 December 2013 • Interpol • Prevention of Cruelty to Animals 19:09 • Zimbabwe Policy on Wildlife • Policy and plan for elephant management in Zimbabwe 1997 • ETIS Programme
Biological monitoring and management Monitoring and management of elephants in Zimbabwe conforms to the requirements of locally and internationally adopted standards and guidelines.	• National Elephant Management and Conservation Action Plan(Draft) 2015/2016-2020/2021 • Sebungwe Region Elephant Management and Conservation Plan 2015 – 2020 (Draft) • MIKE Programme

	• WWF Quota Setting Manual • IUCN Guidelines on introductions and reintroductions
Social, economic and cultural Elephant management takes into account the enables derivation of economic benefits to local communities and the country at large, by conferring elephants with an economic value. Co-existence between wildlife by local and elephants is enhanced by mitigating human and elephant conflict.	• CAMPFIRE • Wildlife Based Land Reform Policy of 2008, • Statutory Instrument 26 of 1998 • Traditional Leaders Act No. 25 of 1998 as amended last by Act No. 22 of 2001.
Coordination and collaboration Zimbabwe collaborates with local, regional and international organisations in elephant conservation. It is also a party and signatory to various regional and international treaties.	• Trans-frontier Initiatives • SADC Protocol on Wildlife Conservation and Law and Enforcement • MOU's with Tertiary Education Institutes • Interpol • Zimbabwe's National Joint Operations Command (JOC) • Southern African Wildlife Enforcement Network (SAWEN) • CITES • CBD • CMS • African Elephant Action Plan of 2010

	• SADC Regional Elephant Management Strategy of 2007 • IUCN African Elephant Specialist Group

Biological monitoring and management

- Monitor elephant population trends and elephant impacts on biodiversity through aerial, ground and ranger-based methods, among others
- Use research findings, expert opinion and informed public opinion to establish thresholds of potential concern (TPCs) to initiate management action in respect of elephant impacts for protected areas
- Monitor trophy quality and adjust quotas to maintain desired levels of trophy quality

Social, economic and cultural

- Facilitate the transparent distribution of the benefits and costs of elephant management and conservation
- Implement effective techniques and land-use strategies to mitigate human-elephant conflict
- Develop and implement an effective communication strategy for local, regional and international audiences

Building conservation capacity

- Secure funding to initiate the implementation of the elephant management plan
- Establish sustainable funding programs to build and maintain necessary human resources and strengthen elephant conservation and management capacity
- Strive to achieve best standards for elephant management, including any forms of utilization
- Engage available expertise and capacity within Zimbabwe
- Unlock value in elephants and their products

Coordination and collaboration

- Establish a national elephant conservation and management taskforce/steering committee that includes stakeholders meetings at least bi-annually to review progress and to develop an annual implementation plan
- Establish four regional management committees to meet at least twice each year and implement regional plans
- Strengthen coordination between the hunting industry and the elephant management program
- Implement an effective information dissemination and communication strategy, including regular progress reports on the implementation of the plan

What are the specific measurable of the management actions?

Specific measurables of management actions (labelled "means of verification of KPIs") are detailed in the Action Plan, a draft of which will be provided to USFWS soon.

The specific measurable of management actions under each key component include the following:

Protection and law enforcement:

- Effectiveness of law enforcement (LE), arrests, elephants killed (A/DC performance contract for KPIs
- Reports on results of law enforcement efforts in various categories recorded at field stations, conservancies, and CAMPFIRE District Offices, compiled at regional and national levels and presented to the Regional and National Coordinating Committees (R&NCC) bi-annually
- Reports on Hunting regulation infringements derived from SOAZ/ZPHGA reports and from field station reports compiled and presented to R&NCC
- Consolidated record of number of field personnel and days operational (law enforcement, research &monitoring, elephant management) for each area in the elephant range compiled and reported on at annual planning meetings
- Research reports and papers on elephant conservation and management

Biological monitoring and management:

- Reports on elephant surveys
- Elephant distribution maps
- Database on elephant mortality
- Assessment report on Thresholds of Potential Concern in elephant ranges
- Report on trophy quality trends
- Reports to international monitoring systems as required (e.g.AED,ETIS andMIKE)
- Reports and maps of active corridors
- Reports on trends in trophy quality

Social, economic and cultural:

- Records of beneficiaries and benefits availed
- Reports on costs associated with elephant censuses, protection outside protected areas.

- Database on Human Elephant Conflict
- Documented policies and list of operating partnerships/joint ventures that promote elephant conservation and management
- Record of investments in elephant conservation measures
- Records and annual summary of arrests and poaching incidents intercepted based on leads provided by communities

Building conservation capacity:

- Record of funds available (USD) and investment by ZPWMA, Private sector, NGOS, and CAMPFIRE in elephant conservation measures (Compiled annually by Elephant Manager/Coordinator)
- Record of funds generated from elephants and their products

Coordination and collaboration:

- Record of meetings,minutes,actions completed, attendance at national and regional committee meetings
- Record of when minutes of meetings were completed and circulated
- Record of reports by the elephant coordinator / manager

2. Population Status

2014 aerial survey reports, including details on how the surveys were conducted (i.e., methodology) and coverage, including maps of elephant observations, herd size and distribution, carcass observations, and distribution.

Any additional data on carcasses, including carcass class and proportion of illegally killed elephants [PIKE].

In the dry season of 2014, elephants and other large herbivores were counted from the air during the period 27 June-14 July (block counts) and 21 August to 1 November 2014 (transect counts). Transects were used over the major part of the area. The area surveyed totalled 60 392km^2 (15 430 km^2 covering the Zambezi Valley, 14 818km^2 covering the Sebungwe Region, 25073 km^2 North West Matabeleland and 5071km^2 for Gonarezhou National Park and Mahenye Communal Lands). Some of the surveyed areas include Mana Pools National Park, Mudungwe, Chewore, Matusadonha National Park, Chizarira National Park, Gonarezhou National Park and Hwange National Park, Matetsi Safari Area, Forest Areas and parts of the communal lands of Tsholotsho, Mudungwe, Mbire and Guruve Districts and Mahenye where elephants are resident.

The principal objective of the survey was to provide relatively precise and accurate estimates of the number of elephants and other large herbivores including their spatial in the survey area as a whole, using a technique that could be executed within a reasonable time and at a reasonable cost. The methods used were repeatable and technically robust and similar to those used during the 2001 serial survey to allow for direct comparison between the years.

The procedures used followed those well established for aerial surveys of large African herbivores and livestock and utilized during earlier surveys of large herbivores in Zimbabwe. The survey was designed using WWF-SARPO's custom software (AIRDESW, version dated 29/05/97).

Overall sampling intensity in this areas was planned to be 15%, with a transect width (i.e. combined width of the two search strips) of 300 m. The planned sampling intensity in each stratum was determined by using the mean of the elephant densities in each stratum during previous surveys (Mackie, 2001; Dunham, 2004) as the predicted elephant densities in equation 1 of Gibson (1992). The population survey result is summarized in Table 3a to 3h below:

Table 3a.Summary of Aerial Survey Results for Elephant in Zimbabwe 2014

Region	Estimate	No. Seen	Variance	% CI	Lower CL	Upper CL	Density (Km^2)
Save Valley Conservancy	1585	118	436828	84.9	239	2931	0.45
Gonarezhou	11452	1571	1960565	24.3	8664	14240	2.14
NW Matabeleland	53991	4926	15140043	14.3	46280	61702	2.16
Zambezi Valley	11657	1094	1292716	19.4	9398	13915	0.69
Sebungwe	3407	583	372110	35.6	2193	4622	0.22
Totals	**82092**	**8292**	**19202261**	**10.5**	**73442**	**90742**	**1.21**

Table 3b. Population estimates and statistics for elephant bulls in the aerial surveyNational Regions of Zimbabwe during 2014

Region	Estimate	No. Seen	Variance	% CI	Lower CL	Upper CL	Density (Km^2)
Save Valley Conservancy	55	4	1825	166.3	4	147	0.02
Gonarezhou	1198	157	33604	30.9	828	1569	0.22
NW Matabeleland	6231	607	370290	19.4	5022	7439	0.25
Zambezi Valley	2560	239	144739	29.5	1804	3316	0.15
Sebungwe	776	115	30700	45.4	424	1129	0.05
Totals	**10821**	**1122**	**581158**	**13.9**	**9317**	**12324**	**0.16**

Table 3c. Population estimates and statistics for elephants in cow herds in the aerial Survey regions of Zimbabwe during 2014

Region	Estimate	No. Seen	Variance	% CI	Lower CL	Upper CL	Density (km^2)
Save Valley Conservancy	1529	114	435003	87.9	186	2873	0.44
Gonarezhou	10254	1414	1926961	27.0	7490	13018	1.92
NW Matabeleland	47761	4319	14769753	15.9	40143	55378	1.91
Zambezi Valley	9098	855	1147977	23.4	6965	11231	0.54
Sebungwe	2633	468	341410	44.3	1468	3799	0.17
Totals	71275	7170	18621103	12.0	62755	79795	1.05

Table 3d. Population estimates and statistics for elephant carcass 1 in the aerial Survey regions of Zimbabwe during 2014

Survey Region	Estimate	No. Seen	Variance	% CI	Lower CL	Upper CL	Density (km²)
Save Valley Conservancy	0	0	0	0	0	0	0.00
Gonarezhou	0	0	0	0.0	0	0	0.00
NW Matabeleland	42	4	1111	165.2	4	112	0.002
Zambezi Valley	0	0	0	0.0	0	0	0.00
Sebungwe	12	2	69	141.1	2	29	0.001
Totals	**55**	**6**	**1180**	**131.3**	**6**	**126**	**0.001**

Table 3e. Population estimates and statistics for elephant carcass 2 in the aerial survey Regions of Zimbabwe during 2014

Survey Region	Estimate	No. Seen	Variance	% CI	Lower CL	Upper CL	Density (km²)
Save Valley Conservancy	0	0	0	0.0	0	0	0.00
Gonarezhou	0	0	0	0.0	0	0	0.00
NW Matabeleland	149	9	2897	73.9	39	259	0.01
Zambezi Valley	13	1	182	236.5	1	45	0.001
Sebungwe	64	11	459	69.2	20	107	0.004
Totals	**235**	**22**	**3620**	**51.5**	**114**	**356**	**0.003**

Table 3f. Population estimates and statistics for elephant carcass 3 in the aerial Survey regions of Zimbabwe during 2014

Survey Region	Estimate	No. Seen	Variance	% CI	Lower CL	Upper CL	Density (km²)
Save Valley Conservancy	27	2	337	140.3	2	65	0.01
Gonarezhou	90	10	759	62.3	34	146	0.02
NW Matabeleland	1001	80	24826	31.6	685	1318	0.04
Zambezi Valley	18	2	166	150.6	2	44	0.001
Sebungwe	259	41	2130	35.7	166	351	0.02
Totals	**1435**	**139**	**28732**	**23.6**	**1096**	**1773**	**0.02**

Table 3g. Population estimates and statistics for elephant carcass4 in the aerial Survey regions of Zimbabwe during 2014

Survey Region	Estimate	No. Seen	Variance	% CI	Lower CL	Upper CL	Density (km²)
Save Valley Conservancy	40	3	457	110.9	3	85	0.01
Gonarezhou	430	54	3879	28.8	307	554	0.08
NW Matabeleland	2940	251	50506	15.1	2495	3385	0.12
Zambezi Valley	693	55	9689	28.2	497	888	0.04
Sebungwe	1141	165	12811	19.7	916	1366	0.07
Totals	**5305**	**534**	**78337**	**10.4**	**4753**	**5856**	**0.08**

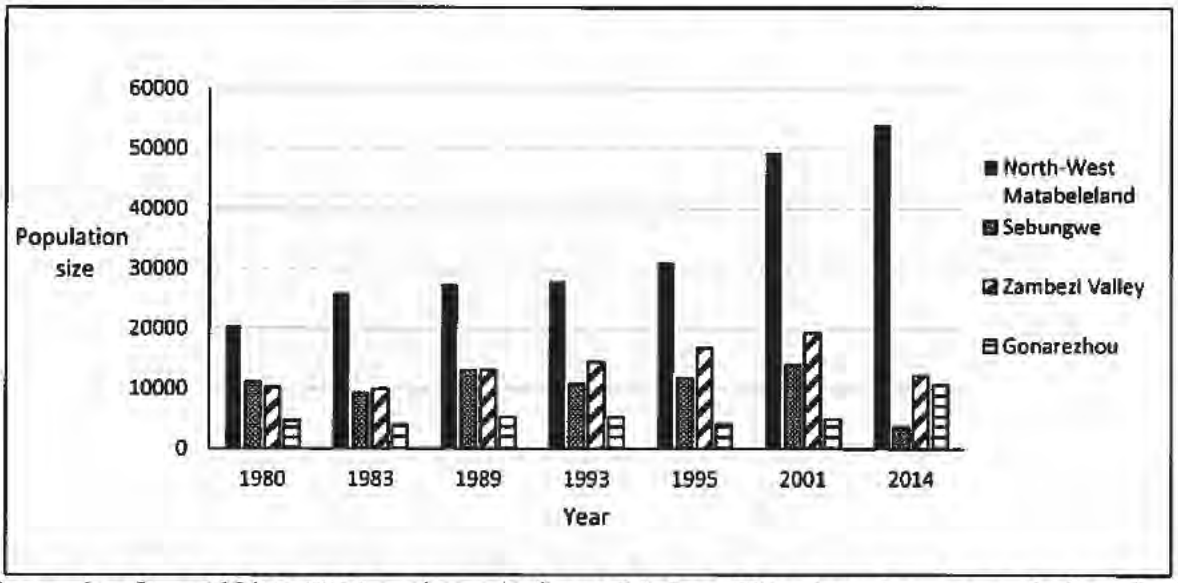
Table 3h. Elephant carcass ratios in the aerial survey regions of Zimbabwe during 2014

Survey Region	1+2 carcass ratio (elephant carcasses in Age category 1 or 2)	All-carcass ratio (all elephant carcasses)	All-carcass ratio (all elephant carcasses and unidentified carcasses)
Save Valley Conservancy	0.00	4.1	22.6
Gonarezhou	0.00	4.3	6.6
NW Matabeleland	0.35	7.1	8.3
Zambezi Valley	0.12	5.8	6.1
Sebungwe	2.17	30.2	38.9

Any demographic analysis of populations by site (e.g., sex and age class, population histograms, projected growth rates).

Please see above gender analysis.

The elephant population in North West Matabeleland and South East Lowveld has been



increasing from 1980 to 2014 as shown in figure 2 below. There have been some declines in the other regions over the same period, although as a whole the country's population has remained relatively stable.

Figure 2. Elephant population trends 1980 to 2014

2. Poaching levels and prevention

A table summarizing Mike and PIKE information from the major populations in Zimbabwe, since recording started in 1999.

Zimbabwe is implementing the MIKE program in the two sites of Nyaminyami and Chewore. Nyaminyami is administered through the CAMPFIRE model while Chewore is a Safari Area managed by the Zimbabwe Parks and Wildlife Management Authority. Zimbabwe has secured funding to establish Mana-Pools as an additional MIKE site.

Table 4a and 4b summaries MIKE and PIKE information from the major populations in Zimbabwe, since recording started in 2000.

Table 4a: Elephant carcasses recorded in Chewore 2000 to 2014

	2000	2001	2002	2003	2004	2005	2006	2007	2008	2009	2010	2011	2012	2013	2014
Total Carcasses	2	14	19	10	14	20	17	14	13	26	29	51	43	91	52
# Illegally Killed	0	0	7	3	3	0	2	11	1	10	4	34	34	36	9
PIKE	0.00	0.00	0.37	0.30	0.21	0.00	0.12	0.79	0.08	0.38	0.14	0.67	0.79	0.40	0.17

Table 4b: Elephant Carcasses recorded Nyaminyami 2000 to 2014

	2000	2001	2002	2003	2004	2005	2006	2007	2008	2009	2010	2011	2012	2013	2014
Total Carcasses	13	10	3	7	11	6	3	10	20	52	19	16	52	36	27
Illegally Killed	8	7	2	2	9	5	2	5	18	45	19	13	14	8	10
PIKE	0.61	0.70	0.67	0.29	0.82	0.83	0.67	0.50	0.90	0.87	1.00	0.81	0.27	0.22	0.37

Data from http://cites.org/eng/prog/mike/data_and_reports and MIKE Baseline information (SC55 Doc. 10.2 (Rev. 1), 2007). Site-level PIKE is likely subject to bias, especially where the total carcass number is less than 30.

It has to be noted that the greater part of the elephant range in Zimbabwe does not have running MIKE of PIKE monitoring regimes. North West Matabeleland, which is not a MIKE site, has the highest elephant population in the country. The poisoning incidents in Hwange in 2013 resulted in a sharp increase in the number of elephant poached. Figure 3 below shows the number of poached elephants in Zimbabwe from 2010 to 2014.

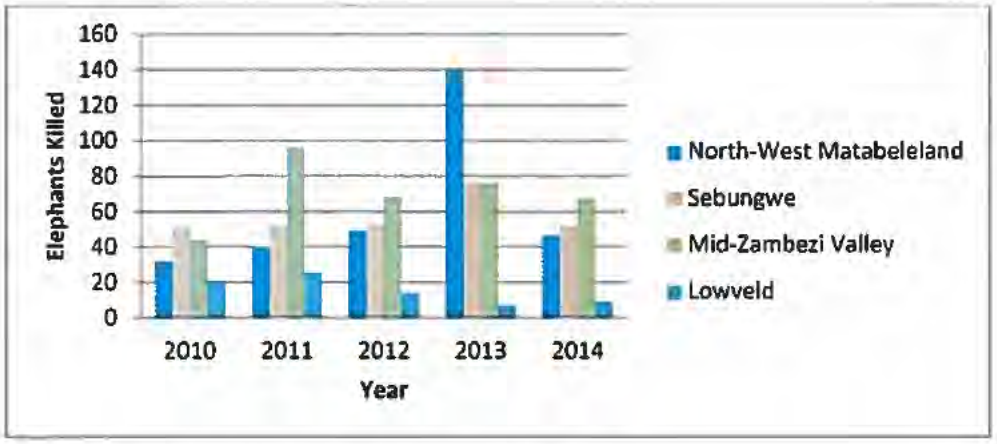


Figure3: Poached elephants Zimbabwe 2010 to 2014

National Policies to address poaching

- Parks and Wildlife Act 1996(amended)
- The Parks and Wildlife Act Chapter 20:14
- Criminal Law Codification and Reform of 2013Act Ch. 19:23
- Protection of Wildlife (Indemnity) Act of 1999 Ch. 20:15
- Environmental Management Act of 2002 Ch. 20:27
- Statutory Instrument 26 of 1998
- The Parks and Wild Life General Laws Amendment number 5 of 2011
- Statutory Instrument 45 of 2014
- Parks and Wildlife Management Authority (Tariff of Fees) By-laws, 2015
- Elephant Conservation and Management Action Plan, 2015/2016-2020/2021
- Sebungwe Region Elephant Management Plan, 2015-2020
- Environmental Management Act of 2002, Ch. 20:20
- Forestry Act Ch. of 1990, Ch. 19:05
- Statutory Instrument 57 of 2012 Parks and Wildlife (Payment for Trapping of Wild Animals) Notice, 2012
- Statutory Instrument 56 of 2012 Parks and Wildlife (Payment for hunting of animals) Notice, 2012
- Firearms Act
- The Customs and Excise Act
- Urgent Measures (African Elephant Summit on 2- 4 December 2013
- Interpol
- Prevention of Cruelty to Animals 19:09
- Zimbabwe Policy on Wildlife
- Policy and plan for elephant management in Zimbabwe 1997

Actions taken by the Zimbabwe government to protect wildlife prevent poaching and punish criminals of wildlife crimes. This should include:

- ***Anti-poaching manpower and budget for anti-poaching in protected areas overseen by ZPWMA.***
- ***Summary of serious wildlife crime cases in recent years (i.e., arrests, outcome of trials, sentences).***
-

Zimbabwe has developed a number of national policies, as well as adopting regional and international protocols to address poaching. As explained the17 April 2014 response to the USFWS poaching incidents are handled though a coordinated public-private response, including heightened law enforcement, severe deterrent sentencing, awareness campaigns, and substantial donations from the private sector to boost ranger and equipment capacity. Steps were also, taken after the Hwange poisoning incidents to improve radio communications in that area, as well as establishing a new station with 15 rangers, to increase law enforcement coverage. Aerial surveillance in Hwange and other areas has been intensified.

It is one of the ZPWMA's policies to cooperate with safari operators, who provide significant assistance by alerting ZPWMA rangers to poaching threats; providing equipment, training and transport; and conducting their own anti-poaching patrols among other things.

Among other things, Zimbabwe has adopted "Urgent Measures" and policies to combat poaching and wildlife trafficking. Following the adoption of the Urgent Measures to halt and reverse the trends in illegal killing of elephant at the high level African Elephant Summit held from 2-4 December 2013 in Gaborone, Botswana, the government of Zimbabwe has implemented the following Urgent Measures;

Urgent Measure 1

a) Zimbabwe has adopted a zero tolerance initiative to poaching, illegal ivory trade and trafficking. The Parks and Wild Life General Laws Amendment number 5 of 2011 provides for a nine year jail term for anyone found in possession of elephant ivory or for the illegal killing of an elephant through whatever means. On a second and subsequent conviction the law provides for an eleven years jail term up to a maximum of twenty years in prison to the offender.
b) Statutory instrument 45 of 2014, Parks and Wildlife Management Authority (Tariff of Fees) By-laws, 2014 provides for the value of raw elephant ivory pegged at US$180 per kilogram and such value is used in the preparation of expert assessment the value of the recovered or intercepted ivory. This assessment forms the basis of docket preparation and will assist in determination by the courts as the offence will already be classified as serious.

c) Statutory Instrument 57 of 2012 Parks and Wildlife (Payment for Trapping of Wild Animals) Notice, 2012, place the value of a live elephant at US$50 000 which value will form the compensation that a sitting magistrate will recover from the accused person in the event of a successful trial and subsequent conviction.
d) Statutory Instrument 56 of 2012 Parks and Wildlife (Payment for hunting of animals) Notice, 2012, place the value of an elephant at US$50 000 which forms the value of compensation which will be paid out by the accused to the complainant in the event of a successful trial and subsequent conviction.
e) The three legal instruments cited in b, c, and d above are legislative efforts to ensure that there are no loopholes depending on the circumstance that are available for an offender will to escape prosecution under the circumstances.
f) The Criminal Law Codification and Reform Act Chapter provides for the charge of criminal abuse of office by law enforcement or public officials involved in corrupt practices related to poaching and trafficking.
g) The Firearms Act criminalizes the use of automatic weapons such as AK47 assault rifles that are currently utilized by poachers to further their illegal activities. The same Act further criminalizes a person for mere possession of ammunition and arms of war which effectively attracts a jail term of up to 5 years in prison for such related offences.
h) The Customs and Excise Act makes it an offence to anyone caught smuggling elephant ivory out of Zimbabwe and import of such into Zimbabwe.

Urgent Measure 2

a) The Zimbabwe Environmental Management Act Chapter 20:27 of 2002 criminalizes the administration of poison such as cyanide which is used by poachers to kill elephants. Through the Environmental Management Agency of the Zimbabwe Government, sample collection from poisoned sites is being handled by professionals in this unit who have laboratories for testing such poisons and hazardous substances which results are used in any trial that is related to elephant poisoning. The Act was implemented during trial of accused persons involved in elephant poisoning leading to the conviction of poachers who poisoned elephants in Hwange National Park in 2013. Most of the offenders were given sentences of up to 18 years in prison.
b) Awareness workshops that targeted the judiciary, the prosecutors, law-enforcement agencies and other stakeholders involved in the fight against elephant poaching were held and this resulted in significant improvements in the expeditious preparation of dockets and finalization of cases with a marked improved in convictions in the various courts around the country.
c) Task force teams at all level of Government in the law enforcement units have been put in place at national, provincial as well as district level. These units deal with poaching related matters in their areas of policing. Stakeholders in the private sector are assisting

with the provision of scarce resources that are needed to combat poaching and ivory trafficking.

d) The use of helicopters and other aircrafts in the fight against poaching has also increased and this has assisted with deployments and detection of poachers in the field.
e) Cross border collaboration with law-enforcement agencies with neighbouring countries such as Botswana, South Africa, Zambia and Mozambique in information sharing on poacher movements and dealing with immediate incursions has tremendously helped in detection of cross-border poaching and trafficking incidents.

Urgent Measure 3

a) Elephant poaching has been elevated to the level of National Security in the Government of Zimbabwe. All security organs of the state are now playing a role in the fight of elephant poaching.
b) The Zimbabwe Republic Police Support Unit in collaboration with the Zimbabwe Parks and Wildlife Management Authority carries out anti-poaching activities at all levels. The Minerals and Border Control Unit of Zimbabwe Republic Police Criminal Investigations Department is a specialized unit that investigates and prepares wildlife cases for court.
c) The Air-force of Zimbabwe plays a major role upon request in the provision of services and equipment in the fight against poaching.

Urgent Measure 4

a) Within the Zimbabwe's National Joint Operations Command (JOC) structure, elephant and rhino poaching have been elevated to a higher level of National Security Threat thereby making it a priority area of focus.
b) The same structures of the JOC committees have been activated both at national, provincial and district levels for effective monitoring of poaching situation on the ground.

Urgent Measure 5

a) Information of illegal killing of elephants is being submitted to the CITES MIKE Programme.
b) The ETIS data on illegal trade is also submitted to TRAFFIC.

Urgent Measure 6

Zimbabwe is participating in various law-enforcement activities involving neighbouring states, countries in the SADC region. Officers from Zimbabwe have also attended a number of workshops and training on anti-poaching and wildlife trafficking including the execution of controlled deliveries. Valuable expertise has been imparted to the officers and this has assisted in the carrying out of joint cross-border operations.

Urgent Measure 7

Zimbabwe is a member of the regional wildlife enforcement network, SAWEN, and has assisted in information sharing and information sharing and intelligence gathering on the latest techniques in the fight against elephant poaching and ivory trade.

Urgent Measure 8

a) The Zimbabwe Government established the Wildlife Ecological Trust whose mandate is to mobilize resources for the fight against elephant poaching through whatever means. Its thrust is to source for funds and material resources that are allocated to needy areas according to the nature of threat and threat levels in each particular area.
b) Resources in the form of funds, vehicles and field equipment have been raised for Hwange National Park.

Urgent Measure 9

a) Public awareness campaigns for local communities are being carried out in affected areas. The awareness and outreach programmes also target school children.

Urgent Measure 10

a) Zimbabwe has secure facilities for elephant ivory storage at the Central Ivory Stores and also a good registration and database system. The security systems have recently been upgraded to minimize risk.

Urgent Measure 11

a) The principal law and Act which governs and regulates the purchasing, selling and exporting of worked elephant ivory and ivory products for non-commercial purposes is the Parks and Wildlife Act Chapter 20:14. The Act prohibits the hunting of any animal and removal of parts of animals in any from any land without authority. The Act provides for the protection of animals in the following designated arrears, National Parks, Parks and Wild life Estates, Parks and Wild life land, Sanctuaries and Safari Areas. The Act further provides for categorization of animals into protected and specially protected animals. Of particular interest in this case is Part XII which prohibits the hunting, removal and sale of live animals and animal products.
b) From the enabling provisions in the Act, the Minister has issued Statutory Instrument 362 of 1990 Parks and Wild Life (General) Regulations which provides in sections 66-75 for the regulation of manufacture and dealing in trophies to include worked elephant ivory.
c) In addition there is Statutory Instrument number76 of 1998, Parks and Wild Life (Import and Export) (Wild Life) Regulations which specifically deals with Import and Export of wildlife products.

Urgent Measure 12

a) Zimbabwe's Communal Areas Management Programme for Indigenous Resources (CAMPFIRE) is currently under review. Several community empowerment strategies are also being implemented in areas adjacent to protected areas.

Urgent Measure 13

a) Zimbabwe is collaborating with Interpol at national and international levels. Elephant poaching is categorized as a serious crime attracting a heavy penalty in Zimbabwe.

Urgent Measure 14

a) The Government is collaborating with the Government of South Africa through a bilateral arrangement with the University of Pretoria whereby rhino samples are submitted through the RHODIS system for DNA analysis. It is hoped that the same process will be initiated and undertaken in the near future for African Elephant samples

Legislation

All activities allowable in a protected area are governed by relevant legislation. The primary legislation dictating how parks operate is the Parks and Wildlife Act and accompanying statutory instruments. The legislation is obviously not static but can be adjusted to meet desired outputs.

Park management plans

It is the organization's policy that every protected wildlife area is run in accordance with a management plan. It however has to be noted that some of the plans are outdated. To rectify this problem, ZPWMA is in the process of updating protected area management plans. Recently the Authority completed plans for Gonarezhou and Mana Pools National Parks and the plan for Hwange National Park is in the final stages of drafting. The planning process is done in phases and all relevant stakeholders, government and private, are invited to partake. The plans usually cover all facets of the management of the respective area including tourism, infrastructure, and biodiversity management and recommended staffing levels.

Elephant management policy

The elephant's life cycle and longevity requires means that it needs to be managed through a long term management plan. The country's elephant management policy is in its drafting stage and will replace one which expired in 2007. The planning process relied on a number of experts from various fields and also sought input from other stakeholders within the region.

Commercial exploitation of wildlife

It is a government's policy that Zimbabwe should benefit from her natural resources. In addition to non-consumptive tourism, the elephant is also one of the key species in the hunting industry.

This form of exploitation is strictly governed by the Parks' Act and quotas are allocated through a quota setting process described in subsequent sections.

Community Based Natural Resources Management

The government also recognizes that the elephant shares some of its home range with local communities and these communities benefit through the CAMPFIRE program. This apportioning of benefits, is hoped, should translate to a community more tolerant to wildlife.

How ZPWMA is addressing these challenges:

Review of CAMPFIRE

It is now acknowledged that the current CAMPFIRE model has been overtaken by events. The government is therefore in the process of reviewing the concept so that is produces tangible benefits to local communities living with wildlife, especially elephants and large carnivores. This should make locals more cooperative in fostering the country's conservation goals.

Set a board to source donations for the biggest elephant home range in Zimbabwe

The Hwange poisoning incident made clear that poachers are using new and dangerous methods to illegally kill elephant, and ZPWMA must have adequate, additional resources to combat this threat. In trying to address that, the country through the Ministry of Environment water established a board to source funds for the country' conservation programmes. The board, called the Wildlife and Ecological Trust, was instrumental in sourcing 10 vehicles for Hwange National Park.

Increased men on the ground

High levels of staffing are needed to sufficiently control poaching. Zimbabwe, like other African range states, faces significant resource constraints. In key elephant range areas, this challenge has been addressed through a number of strategies:

- ***Ranger call up system***: The poaching pressure is not the same in all areas under the management of ZPWMA. There is now a working system were rangers from low threat areas are temporarily deployed to high threat areas like the Zambezi Valley and Hwange.
- ***Joint anti-poaching patrols***: The ranger compliment in high threat areas has been augmented by enlisting the services of other law enforcing arms of the state, the Zimbabwe Republic police and the Zimbabwe National Army. The police now have almost permanent presence in North West Matabeleland wildlife estates whilst the army is called in when needed.
- ***Recruitment of rangers:*** The Authority has a staff complement of 1,504 active field rangers. This translatesto ground coverage of more than 100 km^2/ranger against an ideal

staffing level of 20km^2/ ranger. Though the Authority is constrained with regards to resources to pay and kit existing rangers, it employed and trained 50 rangers in 2014. It also recalled 50 more rangers who had left the organization as a way of reducing its training budget. Most of the employed rangers were deployed in the Zambezi Valley (see attached annual reports). These measures have resulted in improved patrol effort (see figure 4below).

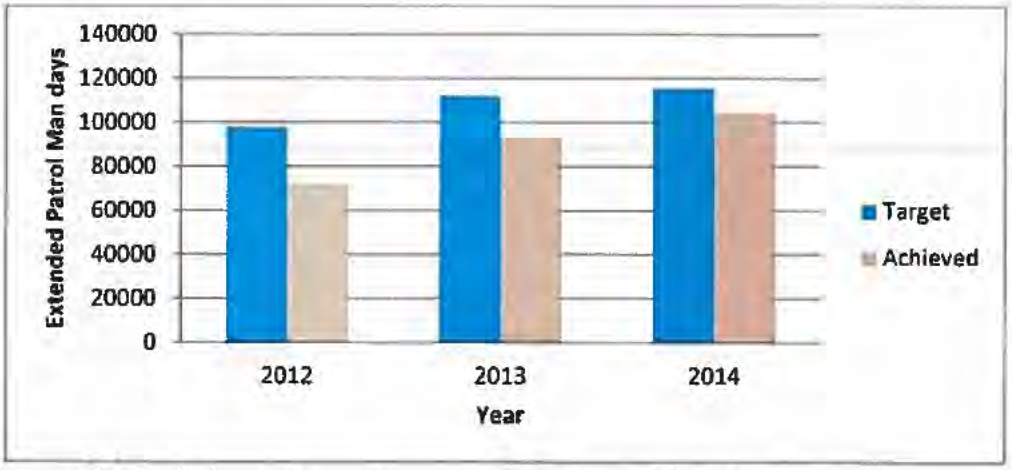


Figure 4: Extended patrol man days, targets against achieved

As seen from the graph, patrol man-days increased from 2013 as a reaction to increased poaching pressure. This was also boosted by the bringing in of details from other law enforcement agents.

Result Based Management (RBM) System for performance management

Poaching of wildlife, especially elephant, is a problem that it acknowledged by the Authority. It has therefore been realized that all Parks employees should give their best efforts in trying to address this scourge. It is with this background that the Authority has instituted performance based contracts for all its employees. These contracts are result oriented and it is expected that all the employees will work to meet targets set in the contracts.

Engagement of the private sector to support conservation initiatives

Conservation is always an expensive undertaking and is always evolving. The Authority on its own can be overwhelmed and as such is always ready to engage private or nongovernmental players in the industry. In the Hwange – Sanyati area, the Authority has enlisted the assistance of WWF Zimbabwe for the implementation of the Hwange–Sanyati Biological Corridor project. This project has a number of components which include improved management of Hwange National Park and neighbouring areas under the management of Forestry Commission of Zimbabwe as well as a component on improving livelihoods of the people in the Hwange Communal Area through the CAMPFIRE program (see attached Project Appraisal Document).

This project, if successful, will result in a more tolerant human population as well as a viable source of wildlife used in hunting areas around Hwange.

The Authority also works with the safari industry, which already conducts anti-poaching operations, to formalize anti-poaching requirement in new concession leases. Further, part of the review of CAMPFIRE will address how to better engage communities in anti-poaching support.

Research is also a vital component of wildlife management. The Authority has a deliberate policy to encourage research within its estate. The permit application process is easy and streamlined for efficiency. Some of the researchers working on elephant related projects include CIRAD, CNRS, Chinhoyi University of Technology and National University of Science and Technology.

Awareness and education

Extensive awareness programmes targeting local communities and schools are carried out throughout the country. Strategies include translating some of the key issues in the Elephant Management Action Plan into appropriate formats such as popular articles, radio programmes, online content, and drama as well as other formats targeting specific groups. Some local NGOs are assisting with the development and distribution of some of the materials. Awareness programmes that target the judiciary on wildlife crime have also been implemented.

Awareness workshops for the judiciary

Though there is legislation guiding how wildlife crimes are to be handled by the courts, it was realized that some provisions of the law were not being fully implemented and some offenders were getting away with light sentences. It is with this background that a national workshop was held with the law enforcement agents and the judiciary in 2011 in Hwange to make them aware of these challenges. This has resulted in stiff sentences being handed down to offenders. Table 6 below shows a summary of cases handled by the authority's investigations department.

Anti-poaching manpower and budget for anti-poaching in protected areas overseen by ZPWMA.

ZPWMA has a staff complement of 1,500 field rangers whose core mandate is anti-poaching activities. Table 5 below is an indicative budget for effective protection of the Parks and Wildlife Estates.

Table 5. Budget for anti-poaching activities

Budget item	Cost (US$)
Staff Costs	14,130,000
Field allowances	971,889
Patrol provisions	1,244,612
Fuels and lubricants	698,977
Vehicles	272,000
Communication	20,000
Air craft hire	120, 000
Drone	60, 000

Summary of serious wildlife crime cases in recent years (i.e., arrests, outcome of trials, sentences).

In 2013, cyanide poisoning led to the death of 105 elephants in Hwange National Park. Following the increase in poaching and trafficking of wildlife products, Zimbabwe adopted zero tolerance to poaching. Thirty-five (35) poachers were convicted for the poisoning incidents and they received between nine (9) and sixteen (16) years jail terms. A summary of serious wildlife crimes is detailed in table 6 below:

Table 6: Summary of Serious Wildlife Crime Cases recorded in Zimbabwe.

	2009	2010	2011	2012	2013	2014	2015 (Jan – Apr.)	Total
Cases investigated	45	66	45	57	76	48	17	354
Cases finalized	20	20	29	30	40	15	4	158
Local poachers arrested	81	55	121	137	109	41	12	556
Poachers	9	5	6	4	3	10	1	38

killed								
Accused prosecuted	65	79	86	83	72	50	15	450
Accused acquitted	4	4	4	6	3	1	0	22
Foreigners arrested	6	19	3	5	13	6	4	56
Tusks recovered	163	118	122	158	197	265	56	1079
Firearms recovered	13	32	29	25	16	15	2	132
Ammunition recovered	261	226	195	454	133	229	51	1549

4. Regulations and Enforcement

The current operating budget for ZPWMA, including sources of funding (e.g., allocated by Parliament, obtained through hunting permits or concessions, conservation fees, donations, etc.).

The budget for ZPWMA is premised on a Results Based Management System where allocation of funds is predicated on projected operational activities and a review of previous operation performance. The budget include sources of funding (e.g., allocated by Parliament, obtained through hunting permits or concessions, conservation fees, donations, etc.).The major sources of funds are conservation fees (land and river) constituting a total of US$9 898 695 and hunting constituting a total of US$ 4 032 733 for 2014. The bulk of the revenue generated in ZPWMA goes towards staff costs (69%) and operation costs (18%) which translated toUS$17,751,988and US$ 4,706,787 respectively for 2014. See Tables7a and 7b below. Full details are specified in the attached approved budgets for the year 2015.

Table 7a:ZPWMA Actual and projected Budgets for 2014 and 2015 in US$

Revenue	2014 Actual	2015 Budget
Conservation fees-land	8,457,106	9,595,000
Conservation fees-river	1,441,589	1,650,000
Accommodation	2,234,281	3,516,000
Annual registration fees	360,616	794,000
Permit fees	1,489,154	2,067,400
Services & facilities	140,369	347,700
Law enforcement	219,473	257,300
Hunting	5,072,493	6,220,000
Fishing permits	948,491	1,236,000
Leases and rentals	2,298,781	3,513,000
Sale of park products	976,678	2,177,000
Examinations	32,481	52,900
Projects	131,487	1,492,100
Other income (Donations)	957,634	1,909,200
Government grants	1,600,000	716,000
Total	**26,360,633**	**35,543,600**

Table 7b: Expenditure for ZPWMA

EXPENDITURE	2014 Actual	2015 Budgeted
Staff costs	17,751,988	20,943,500
Operational costs	4,706,787	8,235,700
Administration costs	3,100,758	3,815,800
Marketing costs	184,879	1,060,000
Total	**25,744,412**	**34,055,000**
Net surplus/(deficit)	**616,221**	**1,488,600**

Note the surplus for 2014 is a result of a 1,600,000 US$ government grant and spending cuts that have reduced manpower levels for ground patrols despite the shortages in manpower.

Revenue Streams

Conservation fees (Park entry and fishing permits) and hunting revenue constitute the bulk of the sources of revenue for ZPWMA, with a contribution of 42% and 17% respectively. See Figure 5a and b below for the categories of revenue streams and the percentages contributed.

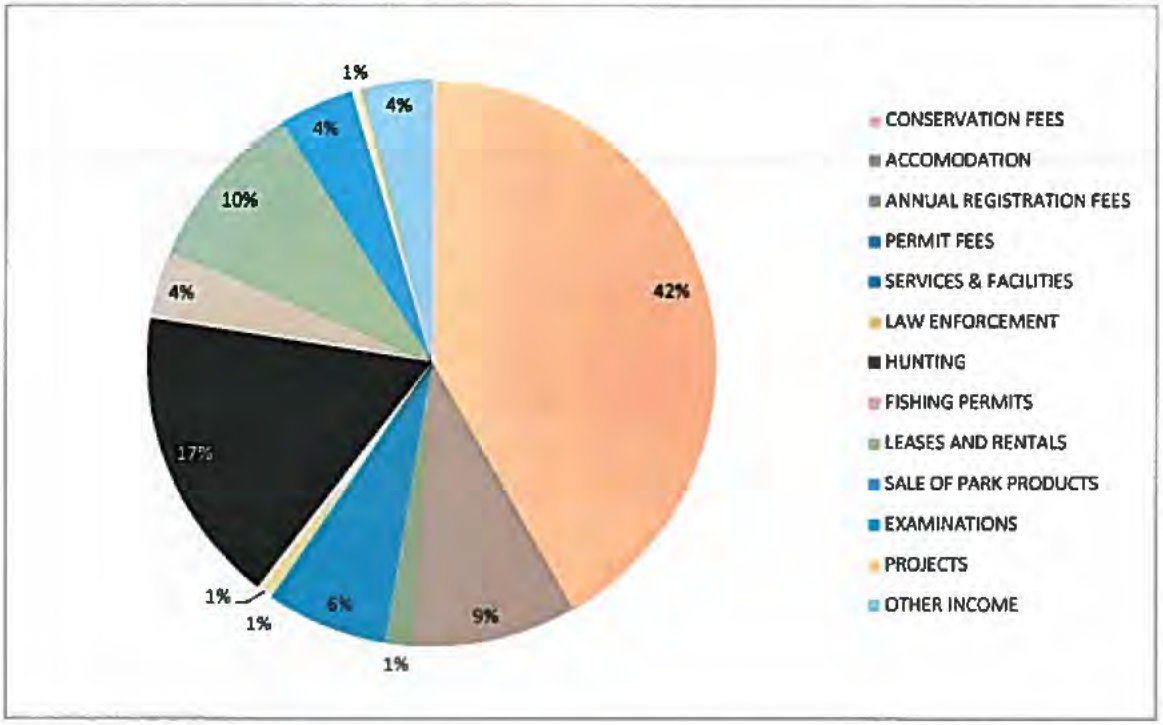


Figure 5a: Main Sources of Revenue for 2014

Expenditure:

Most of the expenditure for ZPWMA (69%) goes to staff and operational costs (18%) (See Figure 5b for the breakdown of the costs).

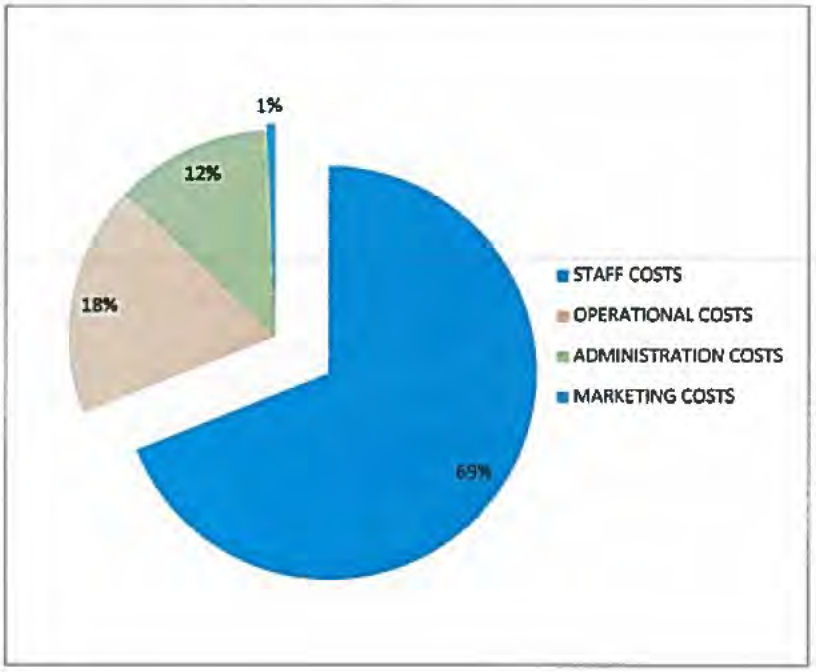


Figure5b: Itemized costs for ZPWMA.

Note: See attached approved budget for 2015 for budget details.

The amount of revenue generated from elephant hunting by U.S .hunters and how those funds are distributed?

The US hunting market constituted 51% and 54% of the elephant trophy hunting in Zimbabwe for the years 2013 and 2014 respectively. See figures6a and 6b below.

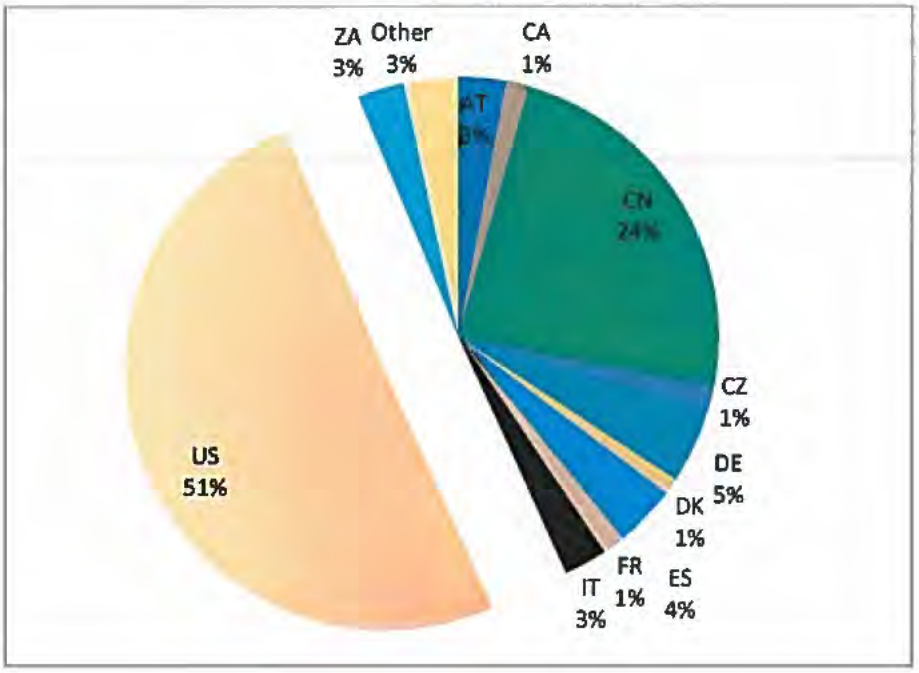


Figure 6a: Source markets for Safari Hunting in Zimbabwe in 2013 from ZPWMA Database

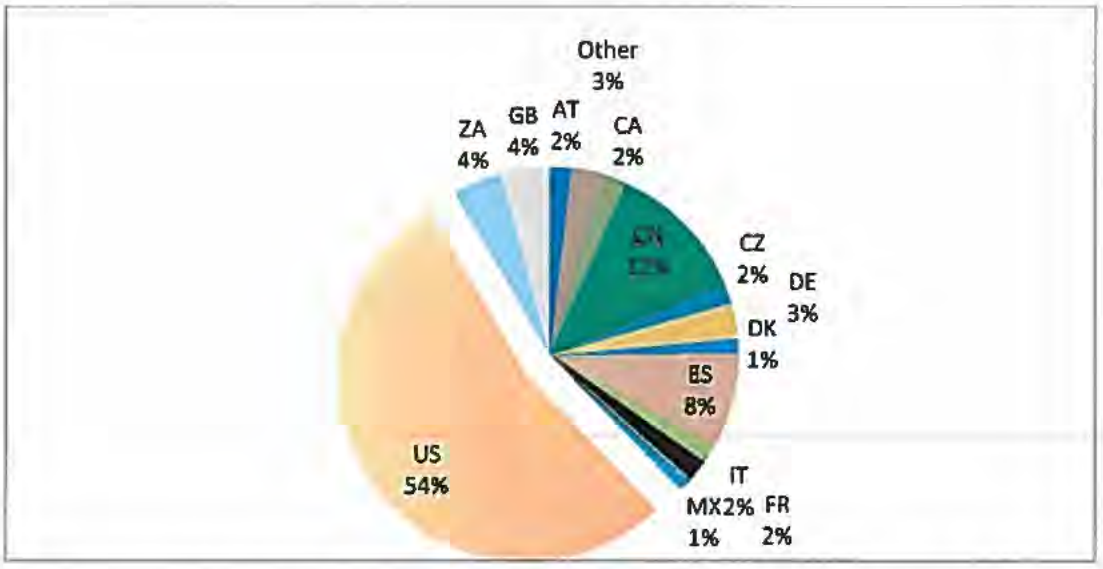


Figure7: Source markets for Sport Hunting in Zimbabwe in 2014 from ZPWMA Database

Hunting revenue is distributed by land-use categories as to sustain the upkeep of the land area where it is accrued. These land areas administered by different authorities with the ZPWMA having the overall authority to oversee wildlife use on these areas. These areas are grouped into the following categories namely National Parks Areas, Forestry areas, CAMPFIRE areas and Private lands (Conservancies and private farms). Hence the accounts are managed separately and will be presented separately.

Over a four year period revenue collected from hunting contributed a total of US$ 21,339,609. There was an11.9% decrease in revenue collection from hunting in 2014 compared to 2013. Table 8abelow summarizes the revenue generated from hunting from 2011 to 2014.

Table 8a: Revenue collected from hunting within the parks Estate 2011 to 2014.

	2011	2012	2013	2014	Totals
Total hunting revenue	5,362,198	5,144,579	5,760,339	5,072,493	21,339,609

Of all the hunting received the American market is estimated to 54% and is inclusive of concession fees and trophy fees,

Hunting outside protected areas is also conducted in other land categories. The revenue from direct elephant hunts is categorized and shared according to land use as specified in Table 8b below. This revenue is mainly generated through trophy fees.

Table 8b: Revenue Distribution from Elephant Hunt by USA citizens in Zimbabwe on other land areas.

5. Sustainable Use

The number of elephant taken per year in each of these categories [sport-hunting, cropping, live animal sale and capture, natural mortality, accidents, poaching, problem animals, management off-takes

Elephant mortalities were recorded under various categories as shown in Table 9 below. The major causes of mortalities over the five year period are natural, poaching and sport hunting.

Table 9: Causes of elephant death from 2010 to 2015

Year	2010	2011	2012	2013	2014	2015
Sport Hunting	134	274	247	258	162	75
Cropping	57	23	0	0	0	0
Live Sales	0	0	4	0	7	0
Natural Mortalities	208	1015	1373	124	1981	455
Accidents (Train)	6	8	38	13	9	6
Poaching	77	223	212	293	194	70
PAC	61	53	173	44	49	52
Other Management	65	53	172	44	47	0
TOTALS	**608**	**1649**	**2219**	**776**	**2449**	**658**

It should be noted that other management off-takes entail ration and training quotas which were set at about 95 animals nationally for ZPWMA run areas. While cropping was carried out in the Save Valley Conservancy between 2012 and 2013 during which a total of 11 elephants were removed.

Details on how the number of elephants to be hunted in each area is decided (i.e., quota setting).

ZPWMA subscribes to the concept of adaptive wildlife management and this also applies to setting national hunting off-takes. One example being a hunting moratorium that was placed on the hunting of lions in the Gwayi area adjacent Hwange National Park after it was realized that the trophy quality was getting poorer and poorer. This also led to the setting up of a point based system for allocating quotas which resulted in some areas getting no lions on quota from four in 2014.

Trophy hunting of elephants, or any wildlife species in Zimbabwe, is undertaken through a strictly regulated quota setting system. Quotas are issued each year to approved landholders by ZPWMA and this is done through national quota setting workshops. These workshops rely on

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information supplied by landholders as well as ecological reports submitted by Parks' ecologists and independent wildlife consultants.

Analysis of trophy quality trends from major hunting areas have indicated that we are still finding mature bulls. It can therefore be assumed that current off-takes are sustainable. It however has to be noted that adjustments to quotas will definitely be made in light of recent upsurges in poaching in areas like Sebungwe and the Zambezi valley. It is also acknowledged that blanket cuts may be detrimental for the species since most of the wildlife farmers depend on income from elephants to fund activities in their areas.

All offtakes for the African elephant in Zimbabwe are sustainable. Key factors that Zimbabwe considers when setting quotas are shown in the Table 10.

Table 10:- Quota allocation for 2014 by major range

Area	Population estimate	Population proportion	Off-takes for 2016	
Zambezi Valley	11657	0.23	69	
Sebungwe	3407	0.07	21	
North West Matabeleland	53991	0.58	174	
South East Lowveld	13037	0.11	33	
Total	82092	0.99	297	

Table 11: Factors considered in quota setting

Factor	**Comments**
Environment	Effects of droughts and other environmental factors are considered when setting quotas (for example die-offs in an area).
Population estimates and indices of abundance	Population estimates for African Elephants are determined using aerial surveys, waterhole counts, road strip counts and field based ranger monitoring. Population estimates are used to determine annual quotas including the 2014 aerial survey

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	results.
Trophy size and quality	Data on hunt returns is captured into a database that is analysed to determine future off takes basing on trophy quality and trends (i.e. the lower the trophy quality, the quota is adjusted accordingly). Hunting success rate is also required to determine quotas. A hunting moratorium can be imposed in an area with declining trophy quality.
CITES National Export Quotas	Zimbabwe has an Annual CITES National Quota of 1000 tusks of 500 sport hunted elephants. Allocation of quotas at the national level does not exceed this limit.
Size of hunting area	Hunting quotas are allocated according to the size of any given property.
Management Systems in place in hunting areas	The following factors are also considered when setting quotas: • Existence of game fences or open access systems • Anti-poaching efforts • Game water supply • Translocations and reintroductions
Illegal off takes	Illegal off takes from poaching are also considered when setting quotas in an area. Quotas are adjusted accordingly in order to ensure that harvests are sustainable. Quotas are set on a localized basis.
Trade	Very strict export and import regulations and trade monitoring systems are in place. Analysis of export data is used to set annual quotas.
Monitoring	The Scientific Authority through an adaptive management process and ongoing rigorous resource monitoring programmes uses all the data and information to ensure that quotas are sustainable. The monitoring programmes include the following: Off takes/Harvests, Legal and Illegal Harvest and Trade; Ranger based Monitoring, Hunt Returns, Live Sales and Translocations; Natural Mortalities, Trophy Quality, Hunting Regulations,

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	Biological: Population Estimates and Densities, Distribution Patterns, Habitat Quality, Local Ground Counts, Hunting Success Rate,

Sustainable quotas are established and monitored through a participatory and adaptive management process (Fig 5) involving private landowners, ZPWMA personnel and CAMPFIRE or local community wildlife managers. Quotas are set so as to have a representative number of animals that can be safely removed during a hunting season without inflicting biological damage to the population. The aim of quotas is to ensure that the utilization of wildlife is sustainable. Data on genetic drift, estimated population, disease outbreak, trophy size, age of animal hunted, habitat status and illegal off take is used to safeguard sustainable quotas. On average, quotas are set based on current data at approximately. The quota for 2016 is set at 400 elephant which is 0.49% of the national population. This is considered a conservative figure according to WWF guidelines and also the population changes in sections of Sebungwe and the Zambezi Valley. Taking into consideration the 2014 survey results the sustainable off take for trophy hunting in Zimbabwe would be 615 individuals. The thrust of wildlife management in Parks Estates is an adaptive management approach which emphasizes scientific research and monitoring. Quotas are set regionally during participatory quota setting workshops (see attached press invitations).

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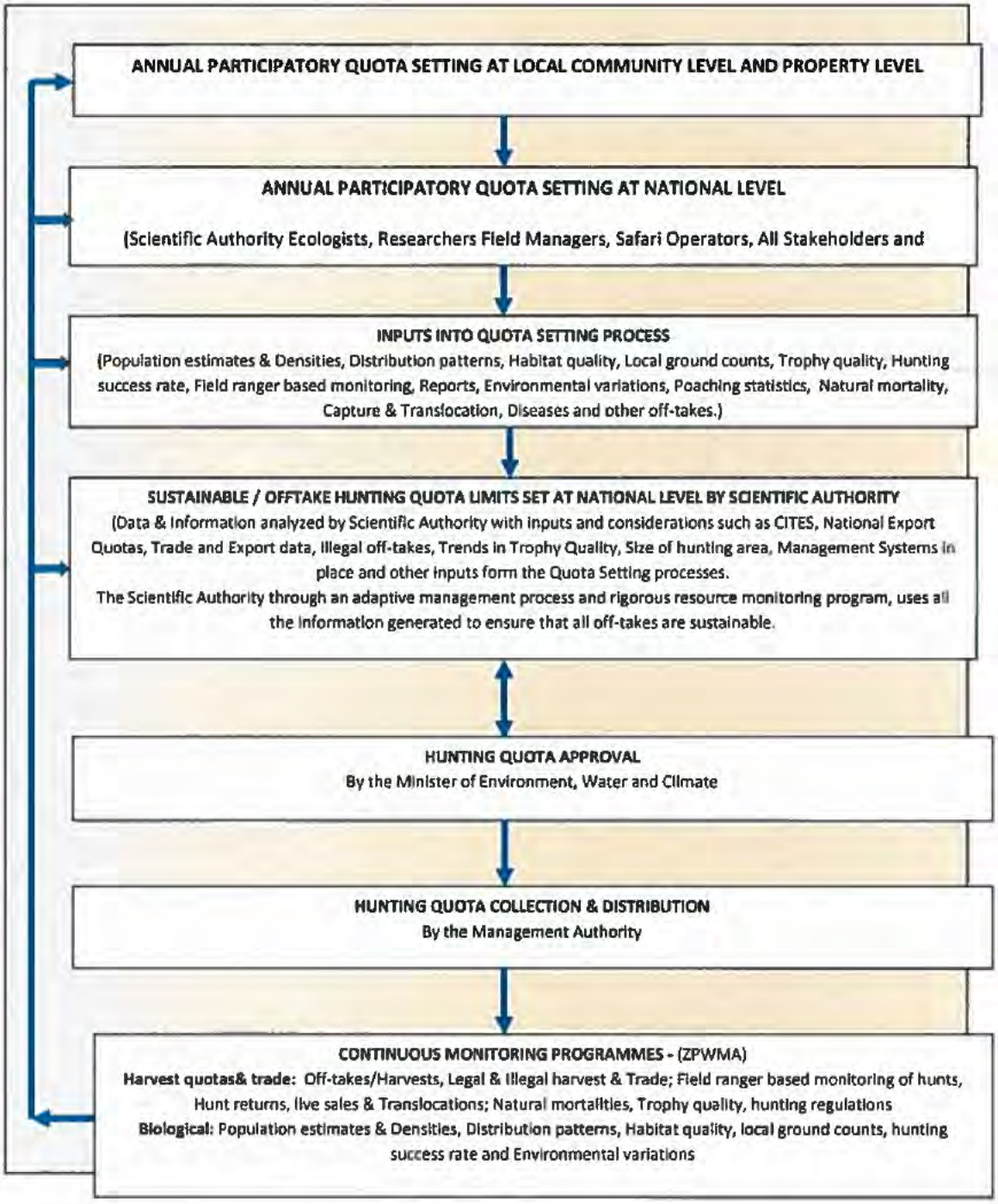

Figure 8: Multi stakeholder participatory quota setting

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6. Revenue

Please provide information on: elephant populations on the four aforementioned land types, the number of elephants hunted on each land type, and the fees paid or the revenues earned from elephant hunts each land type.

Of the four land use types (Safari Areas, Communal Land, Forest Estates and Private Land) where safari hunting is carried out, Safari areas have the highest elephant population, although CAMPFIRE areas have the largest percentage of elephants hunted. Across all land categories, the elephant, even in the private land category where only a small proportion of properties have elephants, accounts for the highest proportion of revenue. Table 12below highlights elephant populations and revenue generated in the four land use categories in terms of trophy fees.

For each of the land uses, on which elephant hunting occurs, please provide the total number of elephant hunts, the total revenue, and a summary for each of management on how the revenues are spent.

Table12: Elephant populations and revenue generated from elephant hunts in four land use types.

Land Use	**Elephant population Estimate (2014)**	**Number of hunts**	**Number shot**	**Revenue generated US$ (Trophy fees)**
Safari Area	9824	58	49	5,072,493 the total includes trophy fees and concession fees for all hunted wildlife on ZPWMA land.
Communal land	6041	69	55	550,000,00
Private land	1585	61	19	190,000.00
Forestry Land	1117	43	39	390,000.00
Totals	**18 567**	**231**	**162**	**6,202,493.00**

Note: - These are population estimates for the major range areas surveyed in 2014. Source ZPWMA records

As shown in Table 12above, a total of 18 567 elephants occur within surveyed wildlife areas where elephant hunting takes place. The most important form of revenue is the trophy fees, which average US$10,000 per trophy elephant. Other forms of revenue include hunting daily rates and incidental revenue which can raise the value of an elephant hunt up to $25,000.00. In the ZPWMA run Safari Areas, most of the revenue is from trophy fees, although from the concessions, in which the Authority actually carries out hunts daily rates also accrue, significantly raising the value of a single elephant hunts.

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How revenue generated is spent

ZPWMA safari areas

Safari Areas mentioned herewith are hunting concessions under the ZPWMA and are allocated to Zimbabwean private operators through an auction system. The total value of safari hunting in this category accruing to the ZPWMA is obtained from right to hunt fees, trophy fees and concession fees. It should be noted that in cases where Safari Areas are leased to private operators, ZPWMA does not benefit from daily rate fees, as these accrue to the operator.

The revenue accrued from these areas is paid directly to ZPWMA and contributes wholly to the conservation budget of ZPWMA. It has to be noted that ZPWMA has a mandate to conserve wildlife in the whole country and as such some of the revenue generated from the safari areas is used for the upkeep of other areas which do not generate revenue but are important wildlife habitats. ZPWMA requires about 200 /km^2 /year to effectively run all the areas under its estate.

Specifically for safari areas, cost centres include paying for staff salaries (a key anti-poaching tool), upkeep of facilities, habitat protection (roads and fireguards), fuels and game water supply. The total staff complement of field rangers in safari areas in the state hunting areas stands at 325 Rangers, and Table12 shows the salary bill for manpower in all safari areas under ZPWMA.

Table13: Staff costs incurred in Safari Areas

Grade	Number	Unit cost	Yearly total
Wildlife officer	11	1,043.75/month	137,775.00
Senior ranger	13	872.03/month	136,036.68
Ranger 1	61	785.87/month	575,256.84
Ranger II	138	749.67/month	1,241,453.52
Ranger III	102	714.51/month	874,560.24
Field allowances	39 912 man days	$5/day	199,560.00
Total			3,164,642.28

As shown on the table above, the bulk of the money generated goes in safari areas to meeting staff / labour costs in those areas. Field allowance refers to daily allowances given to rangers when they spend time out in the field doing extended patrols. Other cost centres include fuel and

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in 2014 a total of 149,760 litres of diesel worth US$ 209,664.00 (about 30% of total fuel used within the whole Parks Estate) diesel was used was used in ZPWMA safari areas.

Communal areas

The communal areas benefits from wildlife through the CAMPFIRE program. This program is key in that it helps to encourage the communities to co-existence with wildlife. Communities are key ally in the country's fight against poaching and we believe that the off-takes from communal areas are sustainable. It therefore follows that legal elephant hunt is a sustainable way of incentivizing locals to help in conservation and is obviously more sustainable than cash hand-outs through donors. The CAMPFIRE program covers a total of 58 districts, covering 50 000 km^2 and more than 777 000 households. Figure 10 is a map showing CAMPFIRE areas in Zimbabwe, which is roughly equivalent to the Parks Estate.

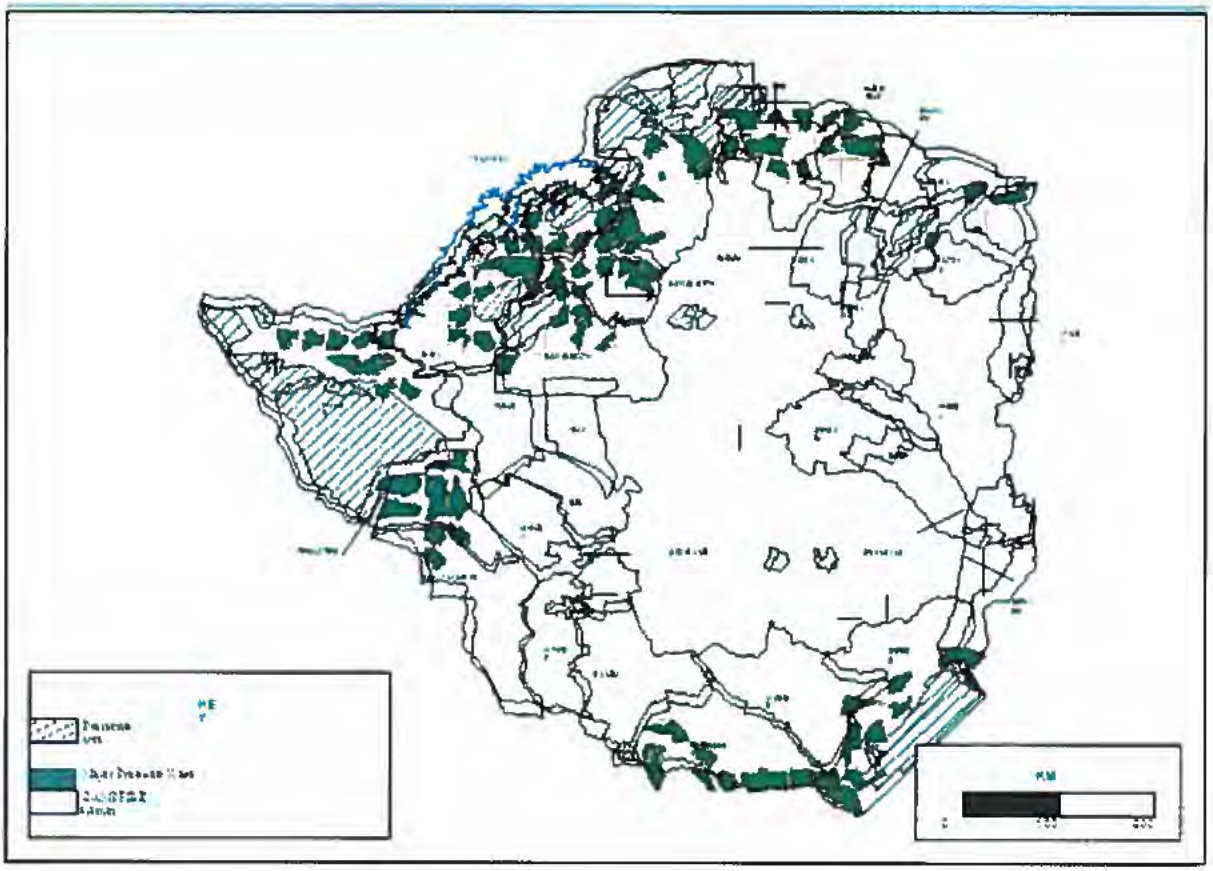

Figure9: CAMPFIRE Areas of Zimbabwe

The most common and lucrative wildlife based activity is sport hunting and the elephant provides the bulk (up to 80%) of revenue generated from wildlife based land use to the communities and the RDC's overseeing the CAMPFIRE program. During the 2014 hunting

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season, a total of about US$1,419,384.00 (costs including trophy fees, daily rates and concession fees) was realized as revenue from elephant hunts under the CAMPFIRE program. Revenue generated from the CAMPFIRE program is ploughed back into managing and protecting the wildlife resource through activities such as anti-poaching patrols, wildlife censuses and problem animal control (PAC), and wildlife surveys. The distribution and use of CAMPFIRE revenue is done in accordance with the CAMPFIRE constitution developed in 1991 according to guidelines developed by the Government of Zimbabwe. The constitution was amended in 2007 with a view to increase the percentage of revenue for the local communities. The distribution of revenue between the Communities, RDC and CAMPFIRE Association is summarized in Table 14.

Table 14: Distribution of Revenue between Communities, RDC and CAMPFIRE Association.

Community	RDC	CAMPFIRE Association
55%	41%	4%

All major RDCs use CAMPFIRE revenue sharing guidelines, and in these districts revenue is paid directly into community controlled bank accounts by safari operators. Table 15 is a summary of how revenue allocated to communities is utilized based on the CAMPFIRE constitution.

Table 15: The Distribution of CAMPFIRE Revenue by Communities.

Project	Percentage allocation
Resource management	26%
Households	22%
Community projects	52%

It is apparent, however, that certain perceptions exist among some communities and observers that the sharing model is no longer being religiously adhered to, raising concerns regarding transparency over the revenue distribution system in CAMPFIRE areas. Some communities feel they are not benefiting adequately from the utilization of the wildlife resource. To this end, a review of the CAMPFIRE concept is being undertaken by the Government of Zimbabwe through the Ministry of Environment, Water and Climate. A funding proposal has been submitted to the European Union (EU) and if approved, the initial workshops will be held in August 2015.

The communities within CAMFIRE areas also benefit from elephant hunting revenue through community development projects as shown in Table 16.

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Table 16.Some of the community development projects funded by hunting revenue in selected CAMPFIRE districts.

District	Project
Beitbridge	Rehabilitation of schools, clinics and irrigation schemes
Bililima	Rehabilitation of 3 clinics and 3 primary schools, hall, fencing field and rehabilitation of lodge
Binga	Schools, clinics and sub offices, rudimentary elephant dung paper making and tanning
Chipinge	3 grinding mills, lorry, teachers houses, community office, shop
Chiredzi	Clinic, teachers' houses, primary school, community-grinding mill, Police sub-office, piped water and electrification of clinic.
Gokwe North	6 grinding mills
Hurungwe RDC	Tillage tractors
Hwange	Agricultural inputs, goats restocking
Matobo	Organic farming gardens
Mbire	Clinic, nurses houses, office, storerooms, 14 classrooms, 7 teachers houses, grinding mill, school office, wildlife administration offices, 2 hand pump bore holes, water pipes, toilet, water storage tanks, 2 tractors, a tourist camp with 4 chalets;
Mudzi	Construction of Chingamuka primary and Chori pre-school
Nyaminyami	Tillage tractors, renovation of dispensary at clinic, nurse's house. Construction of Mayovhe classroom block, 3 grinding mills, Teacher's house, Jongola school. School bursaries x 3 students at Seke Teacher's College. Renovation of pre-schools x 2. Negande: Rehabilitation of water pipeline, grinding mill. Nebiri: Chikuro primary block, rehabilitation of Harudziva water pipeline. Kasvisva: Rehabilitation of water pipeline to supply water to Kasvisva clinic, Kasvisva Secondary school block. Msampa: Teacher's house, Majazu pry, renovation of ward warehouse; Kanyati: Cement for teacher's house renovation.
Tsholotsho	6 classroom blocks, clinic, 10 water engines, 2 F14 cottages
Umguza	Mlandwa secondary school
Vungu	Construction of primary school, borehole, dip tank

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The CAMPFIRE program has managed to bring some important infrastructural development in some communities in Zimbabwe. It is important to note that most of the districts that have significant wildlife and in particular elephant populations are remote and generally underdeveloped, thus the proceeds from CAMPFIRE and the resulting developments go a long way in uplifting communities.

Private land

Revenue generated from these areas accrues to the respective land holders. Ideally ZPWMA, as the custodian of wildlife expects that some of the revenue is ploughed back to conservation. This money will be used for resource protection that is anti-poaching, fire management and water provision. Annually, ZPWMA carries out assessments in all wildlife farms to have an idea of the status of the infrastructure on respective properties.

Forestry commission

The forestry commission, to an extent, is like ZPWMA. They have to raise money for their operation. The revenue generated from elephant hunts is used for funding general activities in their concessions. Some of their major activities are anti-poaching, fire suppression and game water provision.

CONCLUSION

Zimbabwe still has a significant and healthy elephant population, which is the second largest in Africa, with most protected areas having a density of more than 1.5 elephants/km^2. The country has also experienced an increase in human population and the attendant increase in demand for land and natural resources. As such, habitat loss and modification remain as the most serious threat to viability of elephants in Zimbabwe, and also throughout Africa. Elephant management is based on the adaptive management approach which has resulted in the evolution of management strategies to cope with emerging and new methods of poaching. The ZPWMA also realizes the need for consistent and regular monitoring and emphasis has been placed on carrying out more frequent and regular aerial surveys, as well as routine ranger based monitoring of the elephant and other wildlife species populations. This will allow timely management interventions should the elephant population rise above, or fall below set TPCs. Elephants, despite being a constant source of problems for some communities, are an important source of revenue to these same communities, especially through their consumptive utilization. It is an accepted philosophy that wildlife can and should play a significant role in paying for its conservation. There is no doubt that elephant populations without direct economic value are at peril through lack of funding for conservation and also conflict with humans. It is apparent that despite Zimbabwe

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deriving substantial benefits from utilization of elephants, this revenue is not sufficient to support conservation programmes. Considering that the elephant is an internationally recognized iconic species, it follows that local, regional and international efforts need to be initiated and maintained in order to secure the viability of elephant populations. Instead of restrictions being imposed on Zimbabwe in terms of sustainably utilizing elephants, international co-financing of management/protection of Zimbabwe's elephant population can go a long way in sustaining the elephant population. Given the global iconic status of the elephant, and that Zimbabwe has the second largest population of the African elephant, Zimbabwe must not be left to bear the sole burden of conserving the African elephant population.

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List of attachments

1. Draft Elephant Conservation and Management Plan for Zimbabwe (2015-2019)
2. Aerial survey of Elephants and other large Herbivores in Gonarezhou National Park and Save Valley Conservancy(Zimbabwe):2014
3. Aerial Survey of Elephants and other Large Herbivores in Zambezi Valley(Zimbabwe):2014
4. Aerial Survey of Elephants and other Large Herbivores in Sebungwe (Zimbabwe):2014
5. Aerial Survey of Elephants and other Large Herbivores in north-west Matabeleland (Zimbabwe):2014
6. National Summary of Aerial Survey Results for Elephant in Zimbabwe:2014
7. Umfurudzi Park budget for 2015
8. Gonarezhou National Park Budget for 2015
9. CAMPFIRE association budget during USAID
10. Approved ZPWMA budget for 2015

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Gmail **Regina Lennox <regina.lennox.cf@gmail.com>**

Fwd: Draft Proceedings: South East Lowveld Elephant Management Plan Workshop

John J. Jackson, III <jjw-no2@att.net> Fri, Sep 18, 2015 at 8:16 AM
To: Regina Lennox <regina.lennox@conservationforce.org>, Marco Pani (b) (6)

-------- Forwarded Message --------
Subject: Draft Proceedings: South East Lowveld Elephant Management Plan Workshop
Date: Fri, 18 Sep 2015 11:32:31 +0200
From: Diane Skinner (b) (6)
To: Diane Skinner <(b) (6) Thelma Mahachi <tmahachi@zimparks.co.zw>

Dear all,

Please find attached the draft proceedings of the South East Lowveld Elephant Management Plan Workshop. Dr. Cumming and I worked together to finalize and consolidate the attached, based on the discussions held at Hakamela last week.

As agreed, any comments on the draft proceedings should be provided to me by the 30th September to allow finalization of the proceedings by 7th October.

Very best,

Diane
--
Diane Skinner
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Draft Proceedings South East Lowveld Elephant Management 18 September 2015.docx
1304K

SOUTH EAST LOWVELD ELEPHANT MANAGEMENT ACTION PLAN WORKSHOP
Hakamela, Malilangwe
7 – 10 August, 2015

PROCEEDINGS
Draft 18 September 2015

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Introductions

The Facilitator, Dr David Cumming introduced himself and requested Mrs Doris Tom, Regional Manager, to extend the appropriate welcome to the traditional leaders present. Participants were then asked to introduce themselves. The detailed participant list is attached in Annex 1.

The representative of the Director General of the Zimbabwe Parks and Wildlife Management Authority was then requested to formally open the workshop.

Welcome and opening remarks

Arthur Musakwa, Acting Director of Conservation, welcomed participants and opened the workshop on behalf of the Director-General of the Zimbabwe Parks and Wildlife Management Authority (ZPWMA). The full text of the opening remarks follows.

Good afternoon everyone. I would like to acknowledge the presence of our traditional leaders Chief Gudo, Chief Mundau, Chief Sengwe and Chief Jojo, representatives from Frankfurt Zoological Society, Conservation Force representative, Chief Executive Officer of Chiredzi Rural District Council, non-governmental organisations here present, elephant technical experts here present, ZRP, Zimbabwe Parks and Wildlife Management Authority officials, distinguished guests.

Ladies and Gentlemen, on behalf of the Director General of ZPWMA who unfortunately is unable to be with us today, I would like to welcome you all to this special gathering where we are going to deliberate on the future of the South East Lowveld elephant population. Allow me to extend a special welcome to representatives from Conservation Force, Frankfurt Zoological Society and members from Mozambique and South Africa.

I am deeply honoured to preside over the planning workshop for the management of elephants in Gonarezhou National Park and its surrounding areas. It is with no doubt that Gonarezhou, which means a place of elephants, holds an impressive and growing number of elephants in the whole of Zimbabwe. It is an opportune time to meet as different stakeholders and discuss conservation issues of mutual interest as we formulate this Management Plan; a document that will guide and enable us to effectively conserve and manage our elephant population in this sub-region of the South East Lowveld.

Ladies and gentleman, I would like to thank you most sincerely for the sacrifice that you have made in terms of your business schedules and time to be here for this very important workshop. It is gratifying to note that the agenda of this workshop covers a wide range of very interesting items that will give us all the opportunity to discuss and share ideas.

Dear colleagues, we are coming here on the backdrop of the 2014 nationwide survey of elephants whose results confirmed and evidently showed that the elephant population for Gonarezhou is increasing, the results from the survey revealed a 5.6% growth rate. This is highly commendable considering the poaching threats that we are currently experiencing. Escalation in the illegal killing of elephants across the country poses a major threat to the survival of their populations and other wildlife species; we should therefore be wary of this imminent threat and put in place effective measures to curb this scourge. To this end I would like to commend the tremendous effort being made by Frankfurt Zoological Society (FZS) in assisting with the management and protection of elephant population in Gonarezhou National Park. Our management efforts here are therefore challenged to ensure that we have a collective progression and that we take lessons from other areas to solidify South East Lowveld conservation plans and achievements.

The Zimbabwe Parks and Wildlife Management Authority is finalising the National Elephant Management Plan and this can only be completed with input from the four sub-regions i.e. Zambezi Valley, Sebungwe, Hwange-Matetsi Complex and South East Lowveld. It is therefore only logical for each of these four sub-regions to have a management plan that feeds into the National Plan. The development of the Elephant Management Plan for the South East Lowveld will have a tremendous impact on the local populations in Gonarezhou and its surrounding wildlife communities that include Save, Malilangwe, Malipati Safari Area, Bubye, Mwenezi and Chiredzi District.

I have no doubt that given the sum total of expertise gathered here representing a cross section ranging from policy makers, wildlife managers, security agencies, wildlife researchers, local communities and non-governmental organisations, we should be capable to develop a relevant and effective management plan that should help to conserve our elephants.

I wish to thank Frankfurt Zoological Society, for making this workshop possible through their generous sponsorship. Before I hand you over to the Facilitator, I want to thank you once more for your sacrifice and support to elephant conservation and wish you fruitful deliberations and a pleasant stay at this wonderful Camp. I take this opportunity to declare this workshop officially opened. Thank you.

Objectives and purpose of the workshop

The facilitator provided background for the workshop. He made reference to the national elephant management planning process, and noted that the main objective of the workshop was an action plan for the conservation of elephants in the South East Lowveld. He then provided a brief overview of the agenda, included in Annex 2.

Update on poaching and anti-poaching in Gonarezhou

Evious Mpofu, from ZPWMA, provided a brief update on the situation in Gonarezhou with regards to anti-poaching. The Gonarezhou National Park was established in 1975, and covers 5,053 km^2. It forms part of the Great Limpopo Transfrontier Conservation Area, which covers approximately 100,000km^2, incorporating a mosaic of land use types with wildlife conservation as a unifying theme.

Elephants are a critical species in the area. They serve as a major attraction for tourists, and are a vital species for the trophy hunting industry. The Gonarezhou National Park serves as the source of most trophy animals in the surrounding areas. Elephants generally remain inside the park boundaries, and there is a high density of elephants inside the national park, leading to adverse impacts on habitat. It is hoped that improved security and elephant management in areas outside the park would lead to increased movement of elephants outside the park.

Elephant poaching is carried out by both locals and foreigners and occurs along the border areas and around water sources. Most foreign poachers are suspected to be coming from Mozambique using undesignated points to enter and exit. Local people are mostly involved in subsistence poaching, however some syndicates are involved in commercial poaching. The methods of poaching include snaring, dogs and traps for subsistence poaching and firearms and poison for commercial poaching. Wildlife poisoning incidents have increased in frequency and have major ecological impacts.

The poaching hotspots in Gonarezhou National Park include:

- Seasonal pans, such as Guluweni Chefu, Mateke, Gorwe, Makandwa, and Sokwe;
- Save Runde confluence area, which includes two major rivers and perennial pans;

– Areas close to Chitanga, Chicualacuala and Mavhuve settlements in Mozambique; and
– Mafuku/Soshangane area, which is close to the Mwenezi River.

Table 1: Law enforcement statistics for Gonarezhou National Park.

Year	Elephants poached	Contacts	Poachers killed	Poachers arrested	Firearms recovered	Number of incursions
2009	7	50	0	82	0	170
2010	15	160	0	254	1	150
2011	21	120	2	187	0	208
2012	16	90	0	142	1	260
2013	12	130	1	185	3	250
2014	12	54	0	99	0	170
2015	40*	45	2	85	1	308

*Increase in patrol effort in 2015.

A number of strategies had been implemented to counter poaching in the area:
– Establishment of two pickets along Zimbabwe-Mozambique border;
– Establishment of eight pickets along the western boundary of the park;
– Formation of border reaction team and rence reaction team;
– Adoption of mobile patrols so as to increase ground coverage;
– Fencing of part of the northern side of the park to prevent further encroachment into the park;
– Adoption of weekly aerial surveillance;
– Recruitment of 71 cadet rangers to enhance existing manpower; and
– Training, including annual refresher anti-poaching and leadership courses.

Human resources remain an issue. The necessary, and government-approved, scout force in Gonarezhou National Park is 180 rangers. Of the 64 rangers available, only 48 are currently deployable. There is also a lack of investment in anti-poaching by surrounding CAMPFIRE areas and in Mozambique. There is limited cooperation from Mozambique authorities to curb poaching, and follow-up of poachers once they cross the border is difficult. There are also key prosecution challenges, with penalties low and prosecution of poisoning cases very difficult.

Update on poaching and anti-poaching in Chipinge

A representative from Chipinge then provided an update on poaching and anti-poaching in the Chipinge area. He outlined a number of key challenges, including human encroachment into the buffer zone, movement of cattle into the protected area, and shortage of resources. There had been an increase in poisoning incidents, as well as availability of firearms. Problem animal control (PAC) had become a major challenge with the removal of the fence separating the Save Valley Conservancy (SVC) from the community areas.

In the Chipinge area, a number of strategies had been put in place to overcome these challenges. Disturbance methods were used to scare elephants and buffalo away from community areas. Problem lion were usually killed. Awareness campaigns had been increased and wildlife committees had been formed. A patrol system and snare sweeps had been introduced. The local authority (RDC) had been engaged. A longer-term solution would be to use fencing to reduce human-wildlife conflict.

Update on poaching and anti-poaching in the Chiredzi District CAMPFIRE Area

Chenjerai Zanamwe, from the Chiredzi Rural District Council, provided an update on poaching and anti-poaching in the Chiredzi District CAMPFIRE area.

Table 2: Elephant populations in Chiredzi District hunting areas

Name of hunting area	Species	2015 Population Estimates	Chiredzi RDC assessment of status
Chibwedziva	Elephant	Migratory	Stable But Increase In Population
Chitsa	Elephant	Migratory	High Increase In Population
Malipati Communal Area	Elephant	Migratory	Low Increase In Population
Malipati Safari Area	Elephant	Migratory	High Increase In Population
Naivasha	Elephant	Migratory	High Increase In Population
Sengwe I	Elephant	Migratory	Stable But Increase In Population
Sengwe Ii	Elephant	Migratory	Low Increase In Population

The Chiredzi RDC was undertaking a number of activities with regard to elephant management including: awareness creation; capacity development; anti-poaching; data collection and information management; resolution of land disputes; community mobilisation; participation in various projects, trainings or workshops; PAC and PAC data management; habitat management; and fire management, including by-laws.

A number of challenges were faced, including: resource constraints; problem animals; shrinking markets; competing claims; low appreciation on how Councils operate; and low appreciation of the CAMPFIRE programme.

In the discussion following the presentation a number of points were raised:

- Problem animal removals are above and beyond the existing quota.
- Information about whether night hunts were conducted was not available.
- ZPWMA is bearing the anti-poaching costs, while the RDC is receiving a large proportion of the trophy fee and should also be bearing anti-poaching costs.

Update on poaching and anti-poaching in Save Valley Conservancy

Dave Goosen provided a brief update on the situation in the Save Valley Conservancy (SVC), where the total area was down to 2,400km^2 from about 3,500km^2, due to resettlement. SVC holds a diverse membership, including Agriculture and Rural Development Authority (ARDA), RDCs, and private investors. Anti-poaching is undertaken by 90 scouts employed by members, as well as a 34-person special species protection unit. There is currently an upsurge in meat poaching due to the removal of fences, as well as an increase in rhino poaching. To date there has been no targeted elephant poaching.

Malilangwe Trust

Mark Saunders provided a short update on activities in the Malilangwe Trust. The property is fenced entirely and it is likely that the carrying capacity for elephants has been exceeded. Cropping permits have been secured and utilized, resulting in the distribution of 64 tonnes of

meat into communities. There is an 80 scout anti-poaching unit that works across 16 sectors. To date there has been no elephant poaching.

Results of the 2014 aerial survey of the South East Lowveld

Kevin Dunham presented the results of the 2014 aerial survey of the South East Lowveld, which was funded as part of the Great Elephant Census, and conducted in partnership with ZPWMA and FZS. The South East Lowveld survey was part of a national survey to determine the number and distribution of elephants in Zimbabwe. The methods used were repeatable, technically robust and the same as those used during 2001.

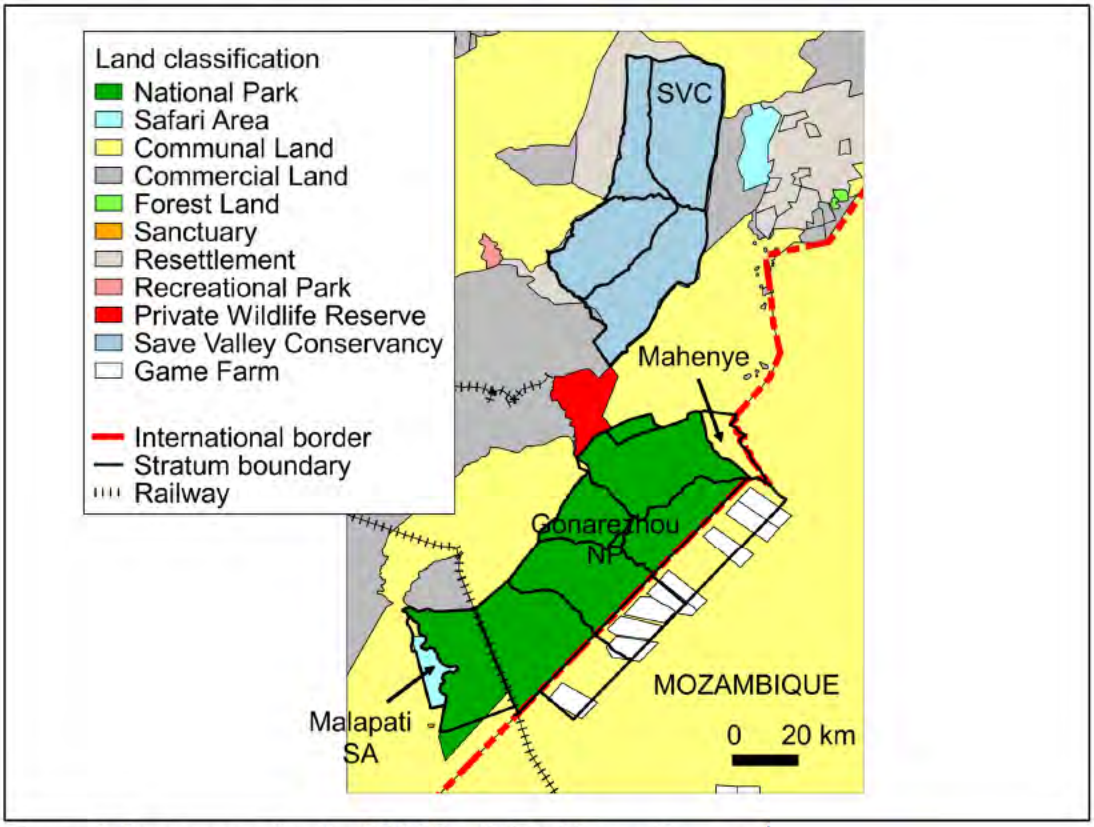

Figure 1: Survey area for the 2014 South East Lowveld survey[1]

Kevin described the survey methodology and noted that elephants and elephant carcasses were the focus of the survey, although all wild and domestic large herbivores were counted and estimated.

Table 3: Initial results from South East Lowveld survey

Area	**Estimate**
Gonarezhou National Park	11 120 +/- CI 25 %
Mahenye	332 +/- CI 156 %
Save Valley Conservancy	1585 +/- CI 85 %

[1] Dunham, K. M. & van der Westhuizen, H.F. (2015) *Aerial Survey of Elephants and other Large Herbivores in Gonarezhou National Park and Save Valley Conservancy (Zimbabwe): 2014.* Frankfurt Zoological Society Gonarezhou Conservation Project, Chiredzi, Zimbabwe.

There are a number of small areas in the South East Lowveld that hold small populations of elephants. These areas were not included in the aerial survey, but information from land managers on each of these populations was solicited at the time of the survey, and represented around 1,200 elephants.

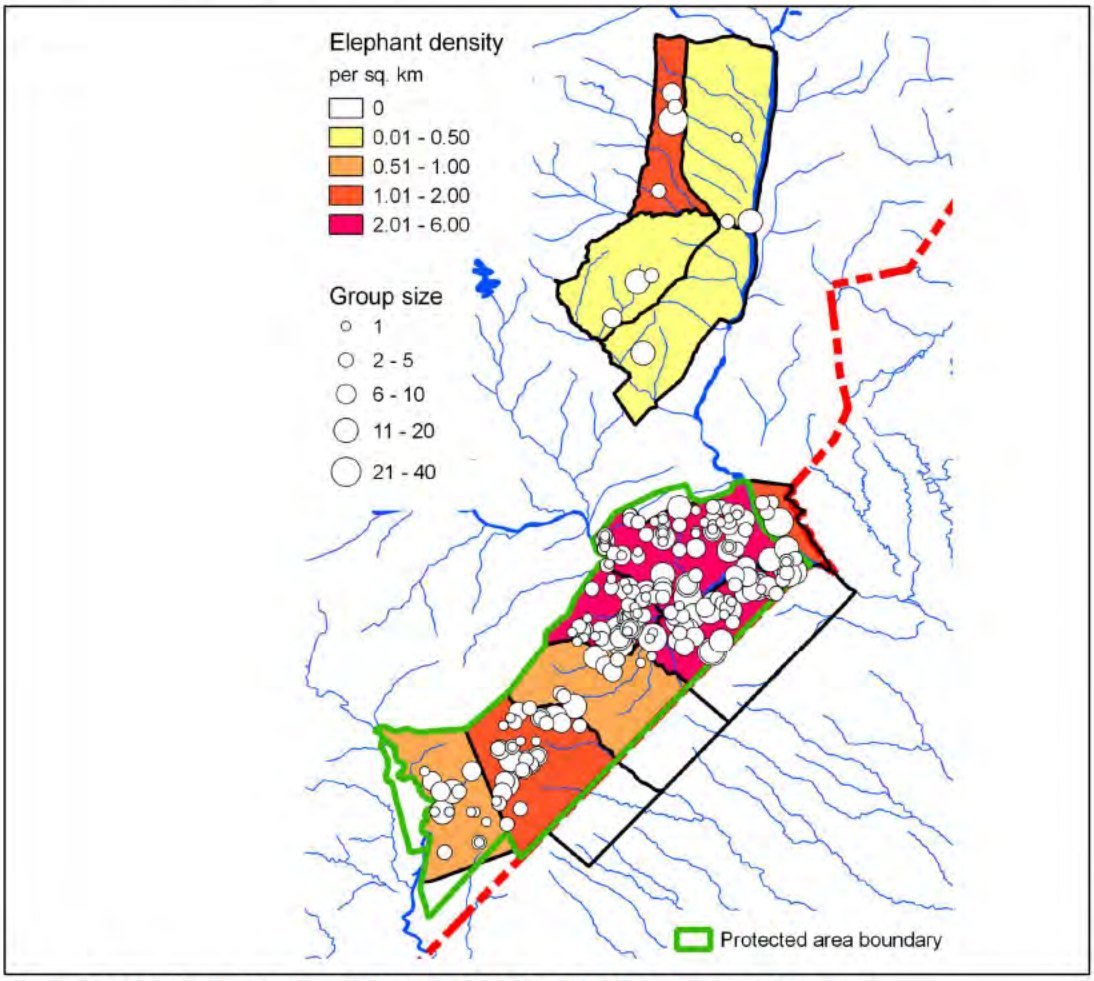

Figure 2: Elephant density during the 2014 South East Lowveld survey[2]

Gonarezhou is likely the best surveyed park in Zimbabwe, with a number of different surveys conducted since 2001. The population has been increasing since 1998 at a rate of 6% per annum. Bull numbers have been going up at 11% per annum, indicating that it may not be a closed population. Carcass ratios do not currently indicate any high levels of poaching.

Following the presentation, a number of key points were raised during the discussion:

- A small strip was surveyed in Mozambique, with the appropriate permissions. No elephants were seen inside or outside the survey strips. Elephants may be using these areas in another season or at night.
- The communal areas in Zimbabwe were not surveyed in 2014, but the 2013 survey turned up very few elephants.
- No elephants were seen in the Malipati area.
- Cow herds were seen in the Mahenye area.

[2] Dunham, K. M. & van der Westhuizen, H.F. (2015) *Aerial Survey of Elephants and other Large Herbivores in Gonarezhou National Park and Save Valley Conservancy (Zimbabwe): 2014.* Frankfurt Zoological Society Gonarezhou Conservation Project, Chiredzi, Zimbabwe.

Stakeholder analysis

The workshop then moved into a working session to analyse stakeholders. The full list of identified stakeholders is available in Annex 3. Primary stakeholders were identified as:

- Ministry of Environment Wildlife and Climate
- Rural District Councils
- Local communities
- ZPWMA
- FZS Gonarezhou Conservation Project
- Malilangwe Trust
- Conservancies
- Security agencies, including the ZRP
- Tourists
- NGOs
- Donors
- Judiciary

Problem analysis

The key issues were identified through a working session using cards, and are summarized below.

Social, Economic and Cultural Framework

- Community development / benefits
- Sour relationship between communities and authorities
- Benefits to the community
- Non-payment of CAMPFIRE proceeds
- Transparency
- Realization of full value to local people
- Benefits / incentives
- Lack of education to communities
- Traditional leadership empowerment
- International perception on elephant conservation (politics!)
- Banning of trophy hunting

Conservation Capacity

- Funding support
- Inadequate funding
- Financing
- Lack of resources

Law enforcement

- Poaching
- Elephant poisoning
- Increased demand for ivory (black market)
- Density reduced of elephants
- Cross-border poaching
- Ivory trafficking
- Lack of anti-poaching activities

Biological and Landscape issues

- HWC
- Compensation
- Informal settlement
- Land use conflict

- Encroachment and fragmentation
- Landscape level management issues
- Elephants restricted to Gonarezhou
- Increase in elephant numbers
- Impact on vegetation
- Impact on biodiversity
- No protection given to iconic animals (large tuskers)
- Fire management
- Artificial water
- Lack of effective monitoring

Coordination issues
- Need for better stakeholder coordination
- Inadequate inter-agency cooperation

Report on Kruger National Park

Sam Ferreira, responsible for Large Mammal Ecology in SANParks, provided a presentation on elephants in Kruger National Park. He summarized the various management paradigms that had been used for elephant conservation in Kruger. Throughout these various paradigms, the monitoring focus had always been on the response of elephants to any management intervention. However, the team at SANParks was now moving to measure the responses of the impacts of elephants, rather than the elephants themselves. The focus has therefore moved to managing elephant impacts, rather than trying to manage elephants numbers or densities. This is based on the assumption that elephants use different areas in different ways at different times.

The number of artificial water points at Kruger had been reduced, and experiments were ongoing surrounding the recreation of 'landscapes of fear' to reduce elephant impacts on certain resources at certain times.

He also provided a small overview of SANParks approach to rhino protection, which included both technological approaches, as well as intensive intelligence approaches. He noted that a huge amount of information was being collected, but needed to be better used through sophisticated analysis to help predict criminal activity.

Mahenye CAMPFIRE programme

Clive Stockil provided a short overview of the CAMPFIRE programme in Mahenye, which had started nearly 35 years previously. With the introduction of trophy hunting of just two elephants, there was an instant shift in community behaviour with regard to elephant poaching. Since then, the programme had grown from strength to strength, and elephant herds were now resident in the Mahenye area, and were moving up to the southern end of the Chimanimani mountains.

This success had resulted in increased conflict with elephants, which should require an aligned increase in benefits. There had been an upsurge in poisoning incidents in the area, likely related to the increased costs associated with having elephants in the area.

Strengths, opportunities and core competencies

The workshop participants moved into five working groups, to identify strengths, opportunities and core competencies within each of the five components of the national framework. The feedback from these working groups is captured in Annex 4.

Statement by Traditional Leaders

Aaron Maramba spoke briefly on behalf of the Traditional Leaders at the workshop. He thanked the organizers and participants for the workshop. He noted the positive participation of community members and traditional leadership.

Development of draft South East Lowveld regional conservation and management action plan

Over two days, participants worked in five working groups to develop the draft South East Lowveld regional conservation and management action plan. The final session of the workshop included a detailed review of all five components of the action plan.

Component 1: protection and law enforcement

Output	Activities	KPIs	Means of Verification	Time frame	Indicative costs	Agencies
1.1 Highly trained rapid response anti-poaching units strengthened	– Appoint anti poaching coordinator (for region and/or separate areas) – Recruit staff – Train staff – Procure vehicles and equipment – Deploy unit – Support existing units	Trained and fully equipped units established and operating with relevant security agency by June 2016	Inception reports Daily and monthly reports, including details on patrols, arrests, and incursions Training reports	Established where needed by June 2016	US$ 230,000	ZPWMA ZRP Conservancies + MT
1.2 Informer and intelligence systems established and/or strengthened	– Identify and recruit informers – Establish and implement incentive protocols – Set up, implement hotline for anonymous reports and communicate it to the public – Analyse and use information – Ensure information is included in database outlined in Output 1.6	An active informer system/network operating within the SEL by Jan. 2016 Hotline widely advertised and operational by Jan 2016	Operational reports Recoveries Records of arrests and successful prosecutions Records of payments for information Records of hotline reports	By Jan 2016	Informer incentives Airtime Cost of setting up hotline	ZPWMA Security agencies Conservancies + MT
1.3 Investigation of wildlife crime improved	– Implement training programmes for investigation personnel – Ensure collaboration between Parks, ZRP and intelligence officers – Recruit more investigators – Put in place Investigator incentive system – Collaborate with forensic scientists and ballistic experts, as well as agencies such as EMA and approved universities (e.g. Chinhoyi University of Technology)	At least two law enforcement staff trained in scene of crime collection and preservation of evidence, ballistics evidence, etc. in SEL. Percentage of investigations resulting in successful	Reports on intelligence-led operations (arrests, dockets, convictions, multi-agency involvement) Training reports, including investigators wildlife crime manual	3 Months Ongoing 3 Months Ongoing Ongoing	$25,000	ZRP ZPWMA

Output	Activities	KPIs	Means of Verification	Time frame	Indicative costs	Agencies
		prosecutions in SEL greater than in 2014				
1.4 Prosecution of wildlife crimes improved	– Train prosecutors on legislation and processes available to deal with wildlife crimes – Conduct awareness / outreach programs with Prosecution, Judiciary – Utilize ancillary laws, such as those dealing with economic crime, organized crime, money laundering, etc. – Communicate status of prosecutions to the public via ZPWMA website – Clear backlog of wildlife cases – Explore the possibility of appointing dedicated wildlife crime prosecutors at Regional and National level	Monthly liaison sessions on wildlife crime and law enforcement held with members of the judiciary Relevant legislation available and being used Wildlife crime prosecutors available and being used in SEL	Reports on arrests, dockets, convictions, sentences Court records Monthly liaison meeting reports ZPWMA website	Starting 3 months, and fully operational by December 2016		ZPWMA Judiciary Prosecutor-General's Office District and Provincial Public Prosecutors
1.5 Law enforcement in collaboration with communities enhanced [Links to Component 3]	– Engage and collaborate on curbing wildlife crimes (ZRP & Communities) – Establish anti-poaching clubs/ community scouts that collaborate with Parks and ZRP – Lobby support from Chiefs to deal with local poachers – Hold workshops with Chiefs about wildlife and wildlife crimes – Establish incentives for communities to provide information	Incentive schemes that encourage the public and members of rural communities to contribute to law enforcement (e.g. through informer hotline) established in SEL Increasing number of incidents of community contribution to law enforcement (e.g. whistle blowers) by Dec. 2017	Reports received through informers or hotlines Trends in reporting from communities Intelligence reports and minutes of meetings Reports on poaching incidents dealt with through traditional leaders Reduced levels of wildlife and environmental crime in the SEL	Ongoing Ongoing	$5,000	ZPWMA RDCs Traditional Leaders ZRP
1.6 Local wildlife law enforcement database established	– Set up database, as per national database – Ensure inclusion of prosecution status in database	Local database established and operating	Inspection of database Operational database	6 months	$10,000 -Computer -Software	ZPWMA Conservancies + MT

Output	Activities	KPIs	Means of Verification	Time frame	Indicative costs	Agencies
	– Implement national data recording protocols – Train data entry staff and crime analysts	Illegal activities recorded and analyzed	Monthly and annual analysis reports		-Training	Security agencies
1.7 Illegal settlements / grazing in wildlife areas reduced [Links to activities on land use mapping and planning in Component 2 – Output 2.2 and incentivization / alternative livelihood activities in Component 3]	– Liaise with RDC, Traditional Leaders and ZRP, DA's Office – Conducted Education programmes – Regular updated satellite mapping	Illegal settlements reduced to less than 5% of wildlife areas by 2020 (i.e. state protected areas, conservancies and community wildlife areas)	Records and maps of illegal settlements and of wildlife land recovered	Ongoing to 2020		ZPWMA CAMPFIRE RDCs Conservancies + MT

Component 2: Biological management and monitoring

Output	Activities	KPIs	Means of Verification	Time frame	Indicative costs	Agencies
2.1 Research programme to understand temporal and spatial drivers of elephants established [Links to Component 4]	– Create enabling opportunities and environment for research – Prioritise research needs – Conduct localised case studies and research projects – Monitor and evaluate poaching and other drivers - hunting, water, food, human disturbance – Explore possibility of GLTFCA flagship research programme for elephants [linked to Component 5]	Research programme that enables local and international researchers, and links with the GLTFCA research programme, in place and producing reports	Annual summary research report Number of research projects Number of essential research projects Number of affiliations with national, regional and international institutions	5 year plan and annual review	Aerial surveys Satellite collars Remote sensing data layers Research operations Permit costs	ZPWMA Conservancies + MT Universities FZS GLTFCA Joint Management Board / Coordinator RDCs
2.2 Current elephant range defined and options for extending range and maintaining connectivity between fragmented populations explored	– Define elephant range use, and existing and potential connectivity – Identify priority corridors and human land use barriers – Conduct spatial analyses to inform land use planning – Advocate land use planning to facilitate connectivity and reduce human wildlife conflict – Explore options for translocating elephants to under-stocked areas	Identified priority corridors for elephant connectivity within SEL and neighbouring countries	Elephant and human range use reports and maps	December 2016	Aerial surveys Satellite collars Remote sensing data layers Research operations Permit costs	ZPWMA Conservancies + MT Universities FZS DA's Office RDCs
2.3 Elephant population numbers, structure, mortality and trends	– Undertake standardised, regular, aerial surveys of the elephant range – Explore methods to monitor elephant	Elephant range surveyed at regular intervals	Aerial survey reports	Aerial surveys - at least every	Aerial surveys	ZPWMA Conservancie

Output	Activities	KPIs	Means of Verification	Time frame	Indicative costs	Agencies
monitored, quotas adjusted, and desired levels of trophy quality maintained	presence and abundance in Mozambique (to Zinave) and up to the Chimanimani range – Undertake trend analysis – Define elephant age and sex structures and extract birth and death rates – Establish annual monitoring plans – Record and analyse elephant mortalities (all causes e.g. poaching, PAC, natural, hunting, etc.) – Monitor trophy quality and age – Develop and implement an age-based and size-based trophy quota	Demographic data available and analysed Annual monitoring plans implemented Evidence-based and research-based information and recommendations (consumptive, non-consumptive) provided to managers and used in quota setting	Minutes of the elephant management committee meeting Minutes of quota setting meetings Reports on mortality, population structure, and trophy quality and age	three years Ongoing monitoring Annual reports	Remote sensing data layers Monitoring operations Permit costs	s + MT Universities FZS International donors
2.4 Elephant impacts on their habitats and selected indicator species of biodiversity monitored	– Establish annual monitoring plans – Measure vegetation indicators such as woodland cover – Measure other functional biodiversity indicators e.g. bird responses to structural changes to woodlands – Measure ecosystem functions – Relate desired impact to measures of elephant abundance and spatial use – Research other drivers of ecological impact (climate change, change in land use, water provision, and fencing, amongst others) – Use research findings, expert opinion and informed public opinion to establish thresholds of potential concern (TPC or limits to change) to initiate management action in respect of elephant impacts in protected areas and effects in communal land	Annual monitoring plans defined and implemented for selected indicator species of biodiversity TPC's defined Evidence-based and research-based information and recommendations (consumptive, non-consumptive) provided to managers	Annual ecological impact monitoring reports Published research papers and reports Minutes of the elephant management committee meeting	Annual	Ecological surveys Remote sensing data layers Monitoring operations Permit costs	ZPWMA Conservancies + MT Universities FZS GLTFCA Coordinator
2.5 Costs and benefits of elephants to local and national economy monitored and costs of elephants to local communities reduced	– Monitor and evaluate extent and costs of human-wildlife conflict incidents – Relate human-wildlife conflict to elephant abundance and spatial use – Understand drivers and social and economic consequences of human-wildlife conflict	Annual monitoring plans implemented Evidence-based and research-based information and recommendations	Annual monitoring reports Human Wildlife Conflict Reports Research reports	Annual	Questionnaire Surveys Centralized database setup and maintenance	ZPWMA Conservancies + MT Universities

Output	Activities	KPIs	Means of Verification	Time frame	Indicative costs	Agencies
	– Evaluate the direct and indirect contribution (financial, economic and social) and the direct and indirect costs of elephants to the well-being of people and to conservation, through both consumptive and non-consumptive uses – Implement ongoing and new mitigation for human-wildlife conflict	(consumptive, non-consumptive) provided to managers	provided to managers Minutes of the elephant management committee meeting		Monitoring operational costs	FZS
2.6 Adaptive elephant management framework adopted and implemented [Links to Component 4]	– Ensure collaboration between Regional Elephant Management Committee and regional and local resource management committees (e.g. LOCAL Forum) – Implement annual process of adaptive planning, implementation and monitoring in line with elephant management objectives and TPCs within the SEL – Develop and implement localised management plans (e.g. SVC plan) – Ensure alignment and harmonisation with other Zimbabwean, regional and international plans	Annual elephant management plans developed, adopted and implemented	Elephant Management Committee Minutes Planning and monitoring reports Annual elephant management plans	Annual	Meeting costs Monitoring and analysis costs	ZPWMA Regional Elephant Management Committee
2.7 Alternative outcomes modelled	– Develop framework for examining and modelling potential linked impacts between biodiversity issues, elephant issues, and societal issues, including any 'surprises', such as disease or extreme weather events. – Implement the modelling framework to define the outcomes of various management scenarios	Established modelling framework being used to guide adaptive management Scenario outcome recommendations and being used in management	Elephant Management Committee Minutes Reports on models and scenarios Recommendations	Begin immediately Ongoing annual reports through 2020	Meeting costs Staff and consultants costs Software costs	ZPWMA Regional Elephant Management Committee Research institutions Researchers
2.8 SEL reporting to meet national standards achieved	– Advocate key summary set of elephant KPIs/outcomes for national reporting (e.g. potential population sizes against actual population sizes) – Comply with national and international legal obligations – Explore the designation of GNP as a MIKE site	CITES reporting requirements met National reporting compliance requirements	SEL regional Reports CITES Reports	Annual	Monitoring costs	ZPWMA Regional Elephant Management Committee

Component 3: Social, economic and cultural framework

Output	Activities	KPIs	Means of Verification	Time frame	Indicative costs	Agencies
3.1 Community partnerships and joint venture oportunities are incentivised and facilitated	– Establish protocols, policies and models for development of joint ventures (PPCPs) – Identify potential areas – Facilitate development of new, and strengthen existing, institutional frameworks and legal entities for beneficiaries at sub-district level – Develop concepts, business plans and prospectuses for different areas through consultative processes with Communities – Develop a SEL Tourism plan and review potential concessions within the framework of this Plan – Develop mechanisms for inclusive and transparent engagement and selection of operators and JV partners. – Facilitate communication, endorsement and support of JVs – Explore potential incentives and avenues of material and technical support that can be provided by Local Government and Authorities to promote establishment and sustainability of Community JVs – Promote access to affordable capital funding – Enhance capacity of community members to engage in wildlife and tourism management through training and employment	Models and protocols for joint ventures established Community institutions to engage in joint ventures established Joint ventures established and operating, resulting in financial benefit to communities SEL tourism developed and potential concessions identified Mechanisms of support and incentivisation to JVs established	Community institution documents (e.g. Trust deeds) Concept notes, business plans and prospectuses for JVs JV agreements and leases Records of meetings, negotiations and consultations SEL Tourism Plan RDC resolutions Community resolutions Record of incentives Project reports & accounts Training reports	Within 12-24 months, and then ongoing	Travel Meetings Drafting Consultants NGO support	RDCs Traditional Leaders and relevant community institutions NGOs Pvt Sector ZPWMA
3.2 Elephant management in community wildlife areas improved	– Promote improved and professionalized elephant management and security in community wildlife areas through establishment and maintenance of improved capacity, infrastructure, security and management systems	Infrastructure, equipment and systems for elephant management in community wildlife areas established and	Project reports Asset / infrastructure register	Ongoing Within 12 months	Capital expenditure – HQ, workshop, roads, water,	JV partners NGOs & donors Local

Output	Activities	KPIs	Means of Verification	Time frame	Indicative costs	Agencies
	– Develop and implement a transparent Performance Based Quota system which incentivises improved management and security systems for elephant in community hunting areas and which promotes effective buffering of source populations – Update terms of lease agreements in community wildlife areas to confer a broader range of roles and responsibilities on operators including resource management and protection; re-investment and infrastructure development; employment targets; local sourcing; etc. – Review key cooperation opportunities across different land uses and countries within GLTFCA, e.g. Sengwe-Tshipise Wilderness Corridor	operational Reduced human-elephant conflict Community capacity for wildlife management improved Opportunities for cooperation within GLTFCA identified	Number of scouts / employees Leases Resource monitoring data Trophy data Number of people / locals employed Invoices and receipts for local goods and services Business plans Meeting records Constitutions and agreements signed Workshop reports		fence, tourism facilities, vehicles and equipment, security infrastructure and equipment Maintenance Electricity Communications Operational costs: Staff and trraining Fuel Research & monitoring Workshops and consultations	authorities GLTFCA
3.3 Additional elephant-based tourism and sustainable utilisation oportunities explored	– Promote awareness and marketing of iconic tuskers – Explore opportunities for expansion of community wildlife areas in viable wildlife corridors to enable establishment of additional sustainable utilisation areas and enterprises. [Links to Output 2.2 – identification of corridors]	Corridors identified and agreements concluded Tourism and awareness campaigns undertaken	Tourism records Marketing materials Business plans	As part of SEL Tourism Plan Within 12 months and ongoing	As part of SEL Tourism Plan, workshops and consultatio	All stakeholders RDCs Communities

Output	Activities	KPIs	Means of Verification	Time frame	Indicative costs	Agencies
			Meeting and workshop reports Agreements signed Reports and maps of corridors		ns	
3.4 Transparent distribution of the benefits and costs of elephant management and conservation facilitated [Links to Output 2.5]	– Conduct regular and comprehensive Community Awareness campaigns regarding quotas, revenues and distribution within Communities – Capacitate and incorporate direct community involvement in management of Community Wildlife Areas, enterprises and JVs. – Diversify downstream natural resources enterprises to multiply the revenues from CBNRM, e.g. NTFPs	Awareness campaigns conducted Community structures have improved capacity to manage NRs and wildlife areas CBNRM revenues are invested in establishment of natural-resource based enterprises Community realises greater employment and financial benefit from CBNRM revenues	Meeting records Training materials & records Number of enterprises established Books of account Number of employees & beneficiaries	Within 12 months and ongoing	Consultations Scoping and feasibility studies Awareness campaigns Company set up and administration	ZPWMA Traditional leaders Communities RDCs Pvt Sector NGOs
3.5 Effective techniques and land use strategies to mitigate human-elephant conflict are implemented	– Review land use zonation through consultative processes [link to Output 2.2] – Promote awareness and adoption of effective HEC mitigation measures – Promote improved rangeland rehabilitation and grazing management to reduce competition between livestock and wildlife [is this beyond elephant management and conservation planning?] – Promote improved and rationalised crop production and alternative mechanisms to promote food security to reduce habitat destruction for inefficient dry land cropping (e.g. irrigation development; carbon sequestration credits to generate income &	HEC is effectively reduced Availability and application of HEC mitigation measures improved There is participation in effective grazing management schemes Grazing is better managed and rangeland health is improved	Land use plans Meeting records Land use plans & agreements concluded Training & awareness materials HEC data Pasture	Within 12 months and ongoing	Workshops and consultations Training materials Consultants Input costs Irrigation development	Communities RDC ZPWMA Pvt Sector NGOs (technical & financial support)

Output	Activities	KPIs	Means of Verification	Time frame	Indicative costs	Agencies
	purchase of staple grains) [is this beyond elephant management and conservation planning?]	There is increased uptake of improved cropping techniques Crop yields are improved Alternative land uses evaluated	monitoring data Crop production data			
3.6 Information on elephants and their conservation is included in school curriculae and environmental education adjacent to key elephant populations in the SEL is promoted	– Promote awareness of elephant conservation (and other issues) through cultural events, art, plays, sport, etc. – Participate in syllabus review of national environmental science curriculum approved by the Ministry of Education – Develop approved environmental training and extension material and promote dissemination to different stakeholder groups within the community – Promote the formation of environmental science clubs at schools – Coordinate various education, training and extension campaigns operating within the district	School children and communities have greater appreciation of elephant conservation issues Greater participation in environmental clubs at schools with greater understanding of environmental issues More social events linked to environmental and conservation awareness are held Elephant conservation messages are conveyed through art and cultural events & competitions Parallel education programmes are coordinated through stakeholder planning sessions at district level	Test Results Competitions Community focus groups Attendance registers Event documentation Number and type of events Workplans Meeting outputs & records	12 months and ongoing	Consultants Endorsements Community consultations Materials and dissemination School visits Training of trainers / teachers Event costs Marketing Sport kit Coordination costs	NGOs RDCs ZPWMA DEO Communities
3.7 Cultural tourism is developed	– Promote existing cultural tourism events and attractions and promote incorporation of	Community participation and tourist attendance	Tourism records	Ongoing	Support for cultural	Communities

Output	Activities	KPIs	Means of Verification	Time frame	Indicative costs	Agencies
and marketed as a centre-piece of SEL attractions and linked explicitly to conservation of flagship species including elephant	messages of elephant conservation within these – e.g. Machangana Cultural Festival; GL-Cultural Festival – Explore and develop additional cultural tourism opportunities – including development of interpretive centres, craft centres, museums, monuments, events, etc. and market these – Document and communicate the specific cultural importance of elephant to communities in the SEL and incorporate this into education, marketing, event and cultural messages and interpretative centres.	of cultural events is increased Messages relating to elephant conservation and environmental issues are key themes The number of cultural tourism developments and enterprises is increased Anecdotes, artifacts and oral tradition regarding cultural importance of elephants are recorded and insinuated into marketing strategies and event messages	Event records & themes Number of enterprises registered Documents compiled		events Planning Awareness and marketing Travel and event costs Scoping, feasibility and planning Workshops and consultations Establishment and registration costs Capex, Opex Marketing Travel & meeting costs Materials, drafting and publication	Traditional leaders Local authorities, Private sector NGOs JV partners Consultants
3.8 Regional tourism is promoted	– Promote the development of infrastructure critical to accessibility of the region: e.g. border crossing at Pafuri; road development and maintenance; scheduled flights to Chiredzi;	Increased tourism traffic and arrivals Infrastructure upgrades Scheduled flights	Tourism & economic data Upgraded	ongoing	Scoping studies Tenders	Central Government Local

Output	Activities	KPIs	Means of Verification	Time frame	Indicative costs	Agencies
	etc. – Promote diversification, branding and marketing of SEL-specific tourism products linked within the region and with other attractions in Zimbabwe and neighbouring countries. – Focus special attention on development of community-led tourism initiatives that contribute to the sustainability of the STWC as a movement corridor for elephant – Clear mines from STWC	established Pafuri border crossing operational Tourism products are diversified Marketing and branding consultants engaged to develop branding and strategy Scoping, feasiblilty studies are undertaken Increased number of CB enterprises are operational	infrastructure Border post Flight schedules Tourism enterprise info Marketing materials Scoping and feasiblity documents Business plans and registrations		 Workshops and consultations Scoping studies Consultants Development of business plans Infrastructure, equipment, operational costs Marketing	Authorities Communities GLTFCA Donors Private sector RDCs NGOs JV partners
3.9 Policy framework for conservation and CBNRM is well understood by communities and other stakeholders in SEL	– Compile factsheets on policy framework for conservation and CBNRM and disseminate to communities and other stakeholders	Communities have access to existing CBNRM and Policy frameworks	Awareness materials Focus groups & attendance registers Enterprise records Employment records	12 months ongoing	Consultation & document compilation Drafting and production of awareness materials Dissemination of materials	Traditional Leadership Communities RDCs ZPWMA NGOs
Effective communication and marketing strategy for local, regional and international	– Develop marketing materials tailored to different target audiences and communication modalities	Tourism arrivals increased	Tourism data Marketing	12 months ongoing	Marketing consultant Marketing	All SEL stakeholders

Output	Activities	KPIs	Means of Verification	Time frame	Indicative costs	Agencies
audiences is developed [Covered by Output 3.1 and Output 5 – suggest removal?]	– Promote efficient communication and feedback between stakeholders	Parallel structures and fora are amalgamated Coordination and communication is improved	materials Minutes and resolutions		materials	
[Consider moving to national plan]	– Consider innovative mechanisms for transboundary resource sharing and expanding “space for elephants” (e.g. live elephant sales to Mozambique to repopulate Zinave & Banhine) [National level activity]	Workshops conducted	Workshop outputs and resolutions	Within 12 months	Stakeholder workshops (and attendant costs) Community consultations (AAC)	All stakeholders GLTFCA

Component 4: Building conservation capacity

Output	Activities	KPIs	Means of Verification	Time frame	Indicative costs	Agencies
4.1 Funding to implement the plan secured	– Implement variable / graduated trophy fee structure based on trophy size [national-level decision] – Review levy / fee structure for elephant hunting and the distribution of these revenues for conservation and communities – Develop and submit bankable project proposals to potential funders – Explore potential business partnerships – Increase capacity and law enforcement coverage by ensuring that all key stakeholders contribute to and are engaged in law enforcement activities: hunting operators, tour operators, and community anti-poaching teams [Links to Output 1.1] – Explore the potential for a dedicated elephant fund for SEL.	Revised trophy fee structure developed, resulting in increased funds available or secured for elephant conservation Number of project proposals developed submitted and funded Number of developed and functional partnerships contributing to improved elephant management	Record of funds available for elephant conservation Record of project proposals	2016 and ongoing		ZPWMA Conservancies + MT NGOs
4.2 Current capacity analyzed and needs identified	– Analyze current capacity – Carry out a needs assessment across the full range of human resources – Carry out a needs assessment for equipment and infrastructure – Develop a strategy to address the identified needs	Needs assessment report	Records and reports	2016 and ongoing		ZPWMA
4.3 Capacity for research and monitoring strengthened and collaboration with research institutions enhanced [Linked to and informed by Components 2 and 3]	– Develop and implement a multi-disciplinary research and monitoring strategy – Develop and implement a research programme based on that strategy, including graduate studies, post graduate and external researchers as well as ZPWMA researchers – Undertake periodic research meetings / conferences – Recruit and meet demands and requirements for research personnel in Parks and surrounding areas – Collaborate with external research institutions – Develop and implement a mentoring programme for researchers	Functional research programme in place Research meetings held Publications Number of research projects developed and implemented Number of research personnel on the ground	Reports and publications Minutes of meetings Records of field personnel	2016 and ongoing	USD 100,000?	ZPWMA, Universities, NGOs, External Researchers ZPWMA, Universities, NGOs, External Researchers, SVC

Output	Activities	KPIs	Means of Verification	Time frame	Indicative costs	Agencies
	– Procure relevant research equipment	Number of collaborative projects Mentoring plan / number of days spent with experienced researchers Inventory of equipment for research procured				
4.4 Training and retraining programmes established	– Carry out a training needs assessment for law enforcement, resource and wildlife management, research and monitoring, education and awareness, community elephant management, etc. – Develop and implement strategies based on the needs assessment – Standardise and harmonize training in law enforcement	Training needs assessment report Training programmes established	Inventory records / assets check list	2016 and ongoing		ZPWMA, RDCs, NGOs, Universities

Component 5: Coordination, collaboration and programme management

Output	Activities	KPIs	Means of Verification	Time frame	Indicative costs	Agencies
5.1 SEL Regional elephant conservation and management steering committee of 8 established (ZPWMA, SVC, MT, Bubi Conservancy, Chiefs' rep, GCP, ZRP, RDC) This committee should include a core set of competencies (and can co-opt expertise if needed).	– Develop TOR for the steering committee – Identify members – Oversee the implementation of the regional elephant strategy as per national mandate – Meet biannually – Attend national elephant management meetings	Functional committee meetings held biannually with adequate attendance	Minutes with action points	Established within 60 days of the Regional strategy final document	$1500 (Fuel, Accommodation) $3,000 (Biannual Meeting) National Elephant Management Meeting - Cost Sunk) Total Budget $4500.00	Regional Manager, Southern Region, ZPWMA
5.2 Links with neighbouring states to confer on the management of shared elephant populations strengthened	– GLTFCA coordinator to identify relevant stakeholders to participate in the implementation of the regional elephant action plan – Sustain collaboration with regional partners+(one committee member for the regional committee meetings) – Share knowledge / data of all 5 key components of the plan with the regional partners	Number of consultative meetings held Tangible regional collaboration and participation	Minutes and action items	Ongoing	-Sunk -*To get confirmation from the GLTFCA coordinator.* - 1xcommitte member travelling to SA or MZ MZ=$1440.00 SA=$1320.00 Zim=$1540.00 Total=$4500	Regional Manager, Southern GLTFCA Coordinator

Output	Activities	KPIs	Means of Verification	Time frame	Indicative costs	Agencies
5.3 Coordination between the tourism industry (consumptive and non-consumptive) and the elephant management programme strengthened	– Identify consumptive and non-consumptive operators in SEL – Liaise with SOAZ, ZPHGA, ZATSO, etc. – Encourage non-members to be affiliated to relevant associations – Hold quarterly meetings with operators – Consider scale of operations in non-consumptive tourism	Regular meetings and workshops convened with the operators	Record of meetings and workshop proceedings Database of operators	Immediate and ongoing	-Sunk -Sunk -Sunk -11 people x one night x 4 times/year= $3080 Fuel=$546x 4times=$2184 Total Budget=$5400	Regional Manager, Southern-ZPWMA ZPHGA SOAZ ZATSO
5.4 Effective information dissemination and communication strategy implemented	– Ensure clear communication of progress against action plan to all relevant stakeholders – Identify target groups, i.e. traditional leaders, school groups, amongst others – Develop a communications strategy, making use of relevant media (print, social, road shows) – Implement communication strategy – Monitor and evaluate	Outreach programmes conducted	Community strategy document Flyer, brochure, websites, published papers, videos, dramas	Ongoing	-Sunk -Sunk -Website setting, double side flyers and media, outreach costs=$10,000	Regional Manager, Southern Steering Committee

Nominations/appointment of regional elephant management committee,

As per the draft action plan, it was agreed that the regional elephant management committee should include representation from and that an interim committee should be established immediately:

- Bubi Valley Conservancy
- Gonarezhou Conservation Project
- Malilangwe Trust
- RDCs
- Save Valley Conservancy
- Traditional leaders
- ZPWMA
- ZRP

In order to move forward as quickly as possible, it was agreed that each agency would nominate an interim representative to Mrs. Tom, Regional Manager, Southern Region, ZPWMA by the end of day, 9 September 2015.

Next Steps

The following next steps were agreed:

- Write up of the proceedings completed by 18 September and circulated to all participants.
- Comments on draft proceedings provided to Diane Skinner by 30 September.
- Revised final report circulated by 7th October.
- Nominations for interim regional steering committee provided by Mrs. Tom by end of day 9 September, 2015
- First steering committee meeting to be held mid-October 2015.

Meeting closing

Mrs Doris Tom, Regional Manager for the Southern Region for ZPWMA, closed the workshop on behalf of the ZPWMA Director General. The full text of the closing remarks follows.

Ladies and Gentlemen on behalf of the Director General of Zimbabwe Parks Wildlife Management Authority, I would like to take this opportunity to thank you for all for your participating at the workshop to develop a regional Elephant Management Action Plan for the South Eastern Lowveld.

I am sure that you will all agree with me that these past two days have been very productive, educational and fruitful not only for us in the South East Lowveld but for other regions as well. This workshop came at a time when we are experiencing an upsurge in elephant poaching especially in Gonarezhou. We believe that with all the contributions and inputs from everyone, we will implement appropriate intervention strategies and other measures in order to improve elephant conservation in the region. I would like therefore to thank you all for leaving your busy offices to attend this workshop and for your invaluable contributions.

We feel greatly honoured by the presence of our local chiefs namely: Chief Tshovane, Chief Sengwe, Chief Gudo, Chief Mahenye and Chief Budzi. Tinotenda!

A special thank you goes to the Frankfurt Zoological Society through the Gonarezhou Conservation Project for mobilising resources and funding to hold this workshop, in

particular Hugo and Elsabe for their commitment and dedication to wildlife conservation in the region.

A warm thank you goes to our regional representatives from neighbouring countries for travelling all the way from South Africa and Mozambique to attend the workshop. We really appreciate your presence as we have benefitted greatly from sharing experiences.

To the Chair of the African Elephant Specialist Group of IUCN, Dr Holly Dublin, we feel greatly humbled that you took time from your busy schedule to come and offer expert advice on the development of an Action Plan for Elephant Conservation in Zimbabwe. We thank you very much!

To President of Conservation Force, Mr John Jackson III, we thank you very much for attending the meeting and for all your efforts and assistance in the development of an Elephant Management Action Plan at national and regional levels.

I would also like to thank the participants representing the following NGOs, African Wildlife Foundation and Save the Elephants, for attending the workshop.

At the local level, we would like to thank the following:

- Chief Executive Officers of Chiredzi, Bikita and Chipinge Rural District Councils,
- Representatives from law enforcement agencies,
- Save Valley Conservancy,
- Safari and tour operators from the region,
- The WILD Programme
- The Lowveld Rhino Trust
- WWF
- Chinhoyi University of Science and Technology
- Technical experts and representatives of Non Governmental Organisation,

We really thank you and appreciate your support.

To Malilangwe Trust and in particular to Mark Saunders and his staff, we sincerely thank you for the warm hospitality at Hakamela, Kwali and Simbiri Camps. We thank you and value your continued support in the conservation of not only the African elephant but other wildlife species in the region.

To the Facilitator, Dr David Cumming and the Rapporteur Diane Skinner, for their professionalism, dedication and guidance, a very special thank you!

To those whose names or organisations were not mentioned, it could have been an omission on my part and I apologise for that we value your support and participation at this important workshop. We thank you very much!

Last but not least, I would like to thank my colleagues, the Regional Managers, Chief Ecologist, Area Managers and other Parks Officers for participating at the workshop.

It goes without saying that your support towards the elephant conservation in the South East Lowveld and our country in general is highly appreciated and please continue the good work. I wish you safe travel back to your respective areas. I thank you! Tatenda! Siyabonga! Hikhesile!

List of Annexes

Annex 1 – Participant list
Annex 2 – Workshop agenda
Annex 3 – Stakeholder analysis
Annex 4 – Strengths, opportunities and core competencies
Annex 5 – Comments received following the workshop

Annex 1 – Participant list

Full name	Position	Organisation / country	Email	Phone
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Annex 2 – Workshop agenda

AGENDA
SOUTH EAST LOWVELD ELEPHANT MANAGEMENT ACTION PLAN WORKSHOP
Venue: Hakamela **Date:** 7th to 10th September, 2015

Day 1 – Monday 7th September

1230: Arrivals, registration and Lunch
1400: Introductions
1415: Welcome and Opening Remarks - DG - ZPWMA
1430: Objectives and purpose of the workshop
1435: Update on Poaching/anti-poaching in GNP and Chipinge - Area Manager
1450: Update on Poaching/anti-poaching in Chiredzi District (CAMPFIRE Area)
1500: Update on Poaching/anti-poaching in Save Valley Conservancy
1510: Results of the 2014 Aerial Survey for the South East Lowveld - Kevin Dunham
1525: Report on Kruger National Park - Danie Pienaar
1540: TEA/COFFEE
1600: **1st Working Session**: Stakeholder Analysis - who are the key stakeholders and actors and what are the links between them? (Plenary)
1700: **2nd Working Session** - Initial Problem Analysis - What are the key issues and the cause- effect relationships ships between them? (Within the 5 Key Components of the Framework)
1745: Break for the evening
1900: Dinner

Day 2 – Tuesday 8th September

0700: Breakfast
0800: Review of previous day's work
0815: **3rd Working Session** - Strengths, opportunities and core competencies within each of the 5 Key Components of the national framework and key stakeholder inputs (e.g. Hunting, Photo-tourism, Communities, ZRP/ZPWMA, NGOs) (Working Groups)
1000: Report back from Working Groups
1030: TEA/COFFEE
1100: **4th Working Session:** Develop Draft Strategic Action Plan with Indicators (Working Groups on key components)
1245: Lunch
1430: Report back from working groups
1530: TEA/COFFEE
1600: Further refinement of Strategic action plans
1730: Break for the evening
1900: DINNER
2000: Small working group – working plan synthesis

Day 3 - Wednesday 9th September

0800: Report back from small working group
0830: **5th Working Session:** Activities, responsibilities and Costs - Working Groups

1000: Report back from working groups

1030: TEA/COFFEE

1130: Report back to plenary by Working Groups and development of Action Plan, Indicators and responsibilities

1245: LUNCH

1400: **6th Working Session**: Final Development of Draft Strategic Action Plan with performance indicators, responsibilities

1530: TEA/COFFEE

1600: **6th Working Session** (continued), nominations/appointment of regional elephant management committee, and Next Steps

1645: **Closing Remarks - DG – ZPWMA**

1700: Break for the evening/participants depart

Day 4 - Thursday 10th September

0700: Breakfast

0800: **Departures**

Annex 3 – Stakeholder analysis

Local government
- Rural District Council
- Local Authorities
- CAMPFIRE Association

Communities
- Communities
- Traditional leaders

Operators
- Hunting operators
- Concessions in Mozambique on the eastern boundary of GNP
- Non-consumptive tour operators

NGOs
- SVC Trust
- Senuko and Clive Stockil
- FZS – Gonarezhou Conservation Project
- Malilangwe
- Nuanetsi
- BVC
- Malipati Development Trust
- AWF
- Conservation Force

Individuals
- Tourists
- Hunters
- Consumers - Ivory
- Consumers - Meat

Donors/international agencies
- German - KFW
- International regulatory agencies (CITES, USFWS, TFCA, etc.)

Government
- ARDA
- Central Government
- Politicians
- Judiciary
- Vet services
- Environmental Management Agency
- Forestry Commission
- Ministry of Lands
- Ministry of Environment, Water and Climate

Security
- Security Agencies
- ZRP
- Forensic Services
- JOC

International
- SANParks
- GLTFCA
- MZ ANAC

Other
- New farmers
- Cattle owners

Annex 4 – Strengths, opportunities and core competencies

	Law enforcement	**Biological monitoring and management**	**Social, Economic and Cultural Framework**	**Building Conservation Capacity**	**Coordination, collaboration and programme management**
Strengths	– Strong support legislation and sentences – Collaborative structures, e.g. JOC – Support from NGOs on anti-poaching units (GNP and Malilangwe) – Training capacity – Availability of resources, e.g. GNP and Malilangwe – Involvement of private sector, SVC – Support of local traditional leaders and communities – Successful CAMPFIRE programmes, e.g. Mahenye	Monitoring – Existing information – Existing expertise Biological – Growing elephant population – Historical strength in biological management of elephants – TFCA	– Viable source population, including unique value of large tuskers – Policy enabling to sustainable utilization, both consumptive and non-consumptive – Policy framework for devolution and benefit sharing – Intact community buffer areas – Strong tradition of conservation o cultural importance o traditional leadership o by-laws o All reinforced by institutional understanding of CAMPFIRE – Connectivity across broad landscapes (TFCA) – Strong community structures and institutions, local government and traditional – Examples of success – Safe and secure environment	– Available human resources – Existing infrastructure – roads, comms – Existing training institutions, e.g. Mushandikwe College of Wildlife Management in Masvingo – Established research centres and experts – Existence of CBNRM programmes – On-the-job training	– GLTFCA Steering Committee – Conservancies + MT – Natural Resources Committee at RDC level – GCP – Gonarezhou Conservation Project – Annual quota setting meeting – Future of hunting document – Member of CITES – Strong history of wildlife conservation in the SEL – dissemination and coordination – Information dissemination o GNP CLO o MT CLO o SVC CLO o Nuanetsi CLO o CRDC Chiredzi o Chipinge RDC
Weaknesses	– Weak cross-border collaboration, e.g. between MZ and ZW – Lack of manpower in PA and non-PA – Different land use options, e.g. cross-border and in SVC – Inadequate intelligence and inter-	Monitoring – Monitoring dead elephants, including hunting – Interpretation of information – Evaluation of information (when do we know and raise the flags on a problem)		– limited funding – limited new technology (GPS units, drones, etc.) – limited collaboration and coordination (research, law enforcement) – what happened to SELCO? And Greater Gonarezhou Ecosystem Forum? And LOCAL Forum? – Lack of employment	

	Law enforcement	Biological monitoring and management	Social, Economic and Cultural Framework	Building Conservation Capacity	Coordination, collaboration and programme management
	agency cooperation – Inadequate resources – Inadequate training in crime scene investigation	– Lack of information on elephant range – Lack of indicators on the consequences of our action – Lack of cross-border coordination on law enforcement, and on quota setting – Procedural constraints on research – HWC – Lack of transparent governance – Monitoring sources of mortality – PAC, poisoning, Quotas, etc. – Demographics is critical. – Understanding movements is also critical.		opportunities to gain experience / internship acceptance – Lack of incentive to learning / capacity within the communities – Fee structure for students to be in the Park is prohibitive – Need to rebuild the capacity in resource economics	
Opportunities	– Strengthen wildlife management outside PAs – GLTP / GLTFCA initiatives – collaboration – International and regional support of wildlife conservation – Public-private partnerships – Cultural value of wildlife	Monitoring – Research – Understanding spatial drivers in elephant management – Performance based funding – Performance based funding opportunities – Exploiting non-traditional funding opportunities, e.g. Carbon Biological	– Untapped potential o Diversification of revenues ▪ consumptive - increasing number of species ▪ non-consumptive – selfdrive, volunteer, fishing, walking, high-end, cultural, etc. ▪ live sales ▪ non-timber forest products ▪ eco-credits (e.g. REDD+)	– Existing private sector players and potential for new ones – Existing strong partnerships and potential for new ones – Well-educated resource base	– CAMPFIRE – Regional Liaison – TFCA – JOC – collaboration – Crime Consultative Committees – chaired by ZRP – NGO – AWF, LRT, WILD, PARSEL, Malilangwe Trust, WWF, Conservancy Trust, GCP – Raoul – need to collaborate more

	Law enforcement	Biological monitoring and management	Social, Economic and Cultural Framework	Building Conservation Capacity	Coordination, collaboration and programme management
		– Creating linkages that provide benefits to humans and elephants – Integrated elephant space management, e.g. performance-based hunting quotas in CAMPFIRE areas	○ Access and marketing – regional and national ▪ Infrastructure, flights, regional tourism ▪ Tapping into national tourism potentials, while increasing awareness of South East Lowveld ▪ Border post at Pafuri ▪ Big Tuskers ○ GLTFCA and regional conservation / tourism / NR management – Increased natural resource value – elephant management offtakes, value of tourism – Increased management and development of wildlife areas, to increase revenue and sustainability – multi-stakeholder PPCPs. – Marketing and awareness of working examples – Monuments		with other development agencies – integrated approach from aid agencies – need to think long-term.
Core competencies	– Coordination and partnerships – Skilled manpower – Adaptive management			– Shared vision, e.g. GLTFCA – Expertise and institutional arrangements available, e.g. law enforcement, aerial survey, CBNRM – Political support / local leadership – Resilience	– vast experience in coordination and collaboration through the TFCA framework

Annex 5 – Comments received following the workshop

Following the workshop, Sam Ferreira provided some suggested measures that focused on the effectiveness and outcomes achieved at the end of the five-year lifetime of the plan if most outputs were achieved.

Key Component 1: Protection and Law Enforcement

1) Poaching is not a key driver of elephant dynamics
2) Crime indices in and around protected areas are low or declining

Key Component 2: Biological Management and Monitoring

1) Elephants have a low local extinction risk
2) Elephants use landscapes with variable intensity
3) The ecological impacts of elephants vary across landscapes

Key Component 3: Social, Economic and Cultural Framework

1) Incidences of human-wildlife conflict is low or declining
2) Human wellbeing indices are high or increasing
3) Elephants are an important contributor to human wellbeing

Key Component 4: Building Conservation Capacity

1) Fulfilled capacity needs are increasing

Key Component 5: Coordination, Collaboration and Programme Management

1) Stakeholder awareness of implementation and results are increasing.

Subject: Fwd: Update from MAPP
From: "John J. Jackson, III" <jjw-no2@att.net>
Date: 1/5/2016 9:45 AM
To: Tim Vannorman <Tim_Vannorman@fws.gov>, Bryan Arroyo - FWS <bryan_arroyo@fws.gov>, Dan Ashe <dan_ashe@fws.gov>, Rosemarie Gnam <Rosemarie_Gnam@fws.gov>, "Craig_Hoover@fws.gov" <Craig_Hoover@fws.gov>

FYI

-------- Forwarded Message --------
Subject: Update from MAPP
Date: Tue, 5 Jan 2016 14:22:57 +0200
From: Lynne Taylor <lynne@thetashingainitiative.org>
To: John J. Jackson III <jjw-no2@att.net>, John J. Jackson, <cf@conservationforce.org>
CC: Marco Pan (b) (6) <[redacted]>, Regina Lennox <regina.lennox@conservationforce.org>

Dear John,

MAPP have recently been asking Zambezi Elephant Fund for support to fund Enock Muziringa, ex Prosecutor from Kariba who has taken on the work of collation of all the results from the action in the field. This is it.

This is for one month only, and a very fine start.

I have by email advised Kevin Higgins that USD500.00 is available to the key informant which led to the arrest of the ivory poacher from Conservation Force.

This is a very good start to 2016.

I do not know to whom Kevin has sent this onto at Parks and will leave that to him to conclude.

Best wishes
Lynne

Attachments:

MAPP MONTLY RETURNS FOR DECEMBER.docx	19.7 KB
Attached Message Part	615 bytes
tti4.gif	10.6 KB
Attached Message Part	6 bytes

MAPP MONTLY RETURNS FOR DECEMBER 2015

Cases Reported	Number Reported	Suspects Arrested	Cases Referred to Court	Cases Finalised at Court	Sentence
C/FORWARD from October 2015 Hunt or Kill an Animal (Zebra)	1	1	1	Pending trial at Karoi Court.	Axxd: Joe Siyamawere
Possess Ivory (10,5kg)	1	4	1	Finalised on 24/12/2015 at Kariba Court	Axxd: (1) Nyasha Musariri (29) 1590 Kuwadzana 1, Harare **Sentence**: Found not guilty and acquitted. Axxd: (2) Alexio Chinzara (34) 275 47th Crescent, Kuwadzana **Sentence**: Found not guilty and acquitted Axxd: (3) Macdonald Mutsvairo (24) Mutsvairo Vge, Chief Mangwende Mrewa. **Sentence**: 9 years imprisonment with labour Axxd: (4) Munyaradzi Muchena (32) 376 Kuwadzana, Harare **Sentence**: Found not guilty and acquitted

Possess 200 x 26m twine nets without a permit	1	2	1	Finalised at Kariba Magistrate Court.	Axxd: (1) George Goto (2) Prosper Nyoni Sentence: $100-00 / 30 Days imprisonment with labour.
Possess raw ivory	1	2	1	Finalised at Kariba Magistrate Court.	Axxd: (1) William Chikwasha (2) Munyaradzi Kampira Sentence: 9 years imprisonment with labour
Found in Possession of .303 rifle Serial Number 34C6088	1	-	-	Still pending arrest	Axxd: Oliver Shumba of Shonhai Vge Chief Siamuchembo, Gokwe North
Fishing Without a Permit	1	1	-	Deposited Fine	Axxd: Muzhinji Mukondo of Musamba Fishing Camp Sentence: Deposited $20-00 Fine Z69j 0094873 23 Kg Fresh recovered. 1 Dingy Boat recovered.
Fishing Without a Permit	1	1	-	Issued ticket number 0094874	Axxd: Paul Dzapasi of Musamba Fishing Camp Sentence: $20-00 Fine
Fishing Without a Permit	1	1	-	Issued ticket number 0094875	Axxd: Tapiwa Nyamasoka of Musamba Fishing Camp Sentence: $20-00 Fine 13kg Fresh Fish recovered. 1 Dingy boat recovered
Fishing Without a Permit	1	1	-	Issued ticket number 0094873	Axxd: Takesure Siazemba of Musamba Fishing Camp Sentence: $10-00 Fine

Fishing Without a Permit with 400M twine Nets	1	1	-	Issued ticket number 0094877	Axxd: Tonderayi Munhezhu of 23 Chalala Fishing Camp Sentence: $20-00 Fine 13Kg fresh fish recovered
Fishing Without a Permit	1	1	-	Issued ticket number 0094878	Axxd: Knowledge Samuel of 23 Chalala Fishing Camp Sentence: $20-00 Fine

Crime Appreciation

Two new cases involving ivory were dealt with by Police with the direct assistance from Mapp and National Parks. Two groups of poachers were arrested and a total of three accused persons were convicted and sentenced to 9 year jail terms each.

Two accused persons were arrested for possession of 200 x 26m twine nets in contravention of section 91(b) of the parks wildlife Act. The accused were rightfully taken to Kariba Magistrate court where they were properly convicted and sentenced. Another accused was also arrested by a patrol team but unfortunately he was not referred to court and was made to pay $20-00 fine which is not deterrent considering that he had 400 metres of twine nets.

A total of six cases of illegal fishing in Lake Kariba were dealt with and all the cases were dealt with at Police station level. The accused were made to pay deposit fines and left free. One case of illegal possession of a .303 was dealt with but accused is still outstanding. The firearm was recovered from accused's home while he was away. It had no valid licence and a bridge block was missing. Accused is a known poacher and could have been using the firearm. The Police are investigating for further links to other crimes through ballistics.

Stakeholders responded positively this month by answering to my plea for returns so that we capture all relevant information. The crimes are projected to escalate considering the state of affairs economically and the prevailing drought. More patrols are called for since more people are resorting to poaching to augment their food supplies.

The cooperation that we are getting from Kariba Magistrate Court cannot go without special mention. The Kariba Court team is awesome and dedicated to their duty to an extent of foregoing their lunch break in order to complete these poaching cases. Simpler cases are taking long to complete in other courts which I think is being attributed to by less visits to those courts due to distance and transport. However the solution

to this problem would be to utilise the Kariba court more. I am pleased to advise you that most cases of interest are being referred there where the results speak for themselves, **convictions, convictions and less acquittals.**

RECOVERIES

IVORY	FIREARMS	FISH	TWINE NETS	BOATS	OTHERS
23.5 KG	1 X .303 RIFLE	57 KGS	600 METRES	3 DINGHIES	1200 M NYLON NETS

WISHING YOU ALL A HAPPY AND PROSPEROUS NEW 2016

Best regards.

Enock Muziringa.

Subject: Confidential Enforcement/Anti-Poaching steps in Zimbabwe
From: "John J. Jackson, III" <jjw-no2@att.net>
Date: 11/30/2015 11:50 AM
To: Tim Vannorman <Tim_Vannorman@fws.gov>, Bryan Arroyo - FWS <bryan_arroyo@fws.gov>, Dan Ashe <dan_ashe@fws.gov>, Rosemarie Gnam <Rosemarie_Gnam@fws.gov>, "Craig_Hoover@fws.gov" <Craig_Hoover@fws.gov>

FYI - **CONFIDENTIAL**

-------- Forwarded Message --------
Subject: RE: News coverage -- Namibia and Zimbabwe -- losses from anti-hunters
Date: Mon, 30 Nov 2015 19:09:27 +0300
From: Alistair Pole <(b) (6)
To: 'John J. Jackson, III' <jjw-no2@att.net>
CC: 'Regina Lennox' <regina.lennox@conservationforce.org>, 'Marco Pani' (b) (6)

Hi John,

A cabinet sub committee was established to deal with the poaching crisis in Zimbabwe, particularly surrounding the on going use of cyanide.

The Permanent Secretary asked if we could help organise a small conference with stakeholders to discuss which we agreed to do. We managed to persuade them that the poaching is a symptom and that if we do not address the wider issues of devolved authority over natural resources and benefit sharing then we will continue to fight these issues.

It was a very positive meeting involving three Ministers (Environment, Tourism and Rural Development) and the Perm Sec from Agriculture. Attached is the presentation that I gave (the article is not very accurate but come to expect that from journalists....) and also a short brief someone wrote up for AWF internally.

Best

Alistair

From: John J. Jackson, III [mailto:jjw-no2@att.net]
Sent: 30 November 2015 18:00
To: Alistair Pole (b) (6)
Cc: Regina Lennox <regina.lennox@conservationforce.org>; Marco Pan (b) (6)
Subject: Fwd: News coverage -- Namibia and Zimbabwe -- losses from anti-hunters

Alistair,

Can you please provide me the paper or presentation you made that is being cited in the attached article?

Thanks,
John

-------- Forwarded Message --------
Subject: News coverage -- Namibia and Zimbabwe -- losses from anti-hunters
Date: Mon, 30 Nov 2015 00:17:08 -0600
From: Regina A. Lennox <regina.lennox@conservationforce.org>
To: John Jackson <jjjipad@conservationforce.org>, John Jackson <jjjiii@att.net>, John J. Jackson, III <jjw-no2@att.net>, Marco Par(b) (6)

26 November 2015
New Era (Windhoek)
Southern Africa: Anti-Hunting Lobbyists Cost Namibia Dearly - Shifeta
Minister of Environment and Tourism, Pohamba Shifeta, says that anti-hunting lobbyists cost the Namibian government US$650 000 last year after pressurising the United States government on the legal auction of a black rhino hunt.
Shifeta said the hunt received negative publicity from people who did not understand the principle of conservation through sustainable utilisation.
"The permit sold for US$350 000, but could have generated more than US$1 million, which was in fact the offer on the table as confirmed by Dallas Safari Club, but which was withdrawn shortly before the auction due to pressure from anti-hunting lobbyists.

"One could therefore say that the lobby groups cost Namibia's Rhino conservation initiative US$650 000, as the total proceeds from the auction were earmarked to go to the Namibia Game Products Trust Fund and would have been distributed among a number of rhino conservation projects," said Shifeta at the 42nd Annual General Meeting of the Namibia Professional Hunting Association (NAPHA).
Shifeta explained that scientists from his ministry select mature, post-reproductive Black Rhino that have previously been identified as overtly aggressive and which pose a serious threat to herd growth and sustainability for the hunt.
"Such animals often charge and kill younger bulls, cows and also calves. These facts are well substantiated, and are very much at the core of our ministry's strategic effort to reduce natural herd mortality," said Shifeta.
Meanwhile, the hunt for the identified black rhino was delayed due to the hold-up for more than a year of the issuing of an import permit for the Black Rhino trophy because of pressure by animal rights activists on the U.S. government.
"During that period the bull, which had been scientifically select to be hunted had killed another black rhino. The non-hunters did in fact not only cost our country's conservation efforts hundreds of thousands of US dollars, but also the life of an additional Black Rhino," said Shifeta at the AGM, which ended at a local hotel yesterday.
Shifeta explained that Namibia is a pro-wildlife country with a progressive national constitution that has formally enshrined the sustainable utilisation of living natural resources.
"We are a hunter-friendly nation with a very proud hunting heritage, and our trophy hunting community is well respected by our government and fellow Namibians as an essential and integral part of Namibia's wildlife conservation, tourism, agricultural and business sectors," the minister said.
He said trophy hunting currently provides more on-the-job training and promotional opportunities, as well as pays better salaries than any other form of agricultural land employment options, and invests

heavily in a variety of social upliftment and educational programmes in rural areas throughout Namibia.
Namibia is firmly established as one of Africa's most popular hunting and tourism destinations, and all reports indicate that 2015 was again an excellent year for the local hunting and conservation community.
However, Shifeta warned that trophy hunting was currently threatened by a number of factors, exacerbated during the last five months by the unfortunate saga of Cecil the lion in Zimbabwe. This anti-hunting sentiment, said Shifeta, is fuelled by rabid anti-hunter sentiments based on emotion rather than fact. These had spread like wildfire on both social media and international news.
"The hype has humanised the lion and demonised the hunters. Zimbabwe, like Namibia, has a sound wildlife management policy in place, which provides rural communities with an incentive to protect their valuable natural living resources. It is up to each and every one of us to raise our voices as enthusiastically as the anti-hunting community does, in order to promote the concept of sustainable hunting as the ultimate conservation triumph," he said.
Namibia is recognised as a world-leader in conservation, with specific focus on rare and endangered species such as the Black Rhino. The Convention on International Trade in Endangered Species (CITES) has granted Namibia an annual export quota of up to five hunter-taken Black Rhinos.
"Only post-reproductive males are hunted, and the revenue derived from such hunts is reinvested in Rhino management, including addressing challenges such as poaching, which is a real threat to Rhinoceros all over the world, and increasingly so in Namibia," noted Shifeta.
http://allafrica.com/stories/201511261410.html

Financial Gazette (Harare)
Zimbabwe: Poachers Cost Zimbabwe U.S $3 Billion
By Shame Makoshori
ZIMBABWE lost about 24 000 elephants to poachers over the past 20 years, prejudicing the hard currency starved economy of an estimated US$3 billion in sport hunting fees alone, the Financial Gazette can report.
Poachers have become a menace within Zimbabwe's animal sanctuaries where they are running rings around a poorly resourced Zimbabwe Parks and Wildlife Management Authority (ZPWMA).
Elephants have been their main target, as poachers seek to satisfy an insatiable demand for ivory, skins, bones and other jumbo parts in some parts of the world.
The vast Asian market tops the list of destinations where elephant products are in huge demand.
Statistics from Africa Wildlife Foundation, whose mission is to ensure the continent's flora and fauna endure forever, suggest that an estimated 1 200 elephants are killed by marauding poachers every year.
This has been the trend from 1995 to date.
Cumulatively, a whooping 24 000 elephants have been killed inside two decades, bringing home a sad reality that the parks authorities have grappled with over the years.
These giant mammals were either gunned down, poisoned or killed through other means.
If one were to use an elephant's sport hunting price of about US$120 000, what that means is that Zimbabwe has been losing revenue at the rate of US$144 million annually.
Progressively, nearly US$3 billion has been lost over a period of 20 years.
Alistair Pole, Africa Wildlife Foundation's director of lands and conservation in Zimbabwe, called for urgent action to save the elephant specie.
For the country's conservation efforts to make an impact, Pole believes that Zimbabwe cannot go it alone without support from international agencies.
"We have been losing a lot of elephants in the past 20 years," he told delegates attending a stakeholders' conference convened recently to explore measures to combat wildlife poaching in Zimbabwe. [***What conference was this? Seems like something we should tell FWS about!***]

"A census in the Zambezi Valley showed there were 19 000 elephants in 2001. There are now 12 000 elephants, that is a loss of 7 000. The real loss is about 20 000 to 24 000 elephants," he said before posing a question: "Where are the elephants going?

Elephants across the African continent face the threat of extinction in the next 50 years amid soaring demand for ivory from Asia, according to the World Wildlife Fund.

Zimbabwe has a large elephant population of about 100,000, but the number has sharply declined in recent years.

The population in the northern Sebungwe district has dropped 75 percent since 2001 -- from 14,000 to 3,500 -- while the number of elephants in middle Zambezi Valley complex fell 40 percent to from 18,000 to 11,500, according to the Zambezi Society, a local conservation group.

In Zimbabwe, reports suggest that poachers are moving away from traditional ways of using firearms to kill wild animals.

In recent times, poachers have been spiking food and water with cyanide and leaving it as bait for the pachyderms.

The chemical is commonly used in Zimbabwe's mining industry, making it relatively easy to obtain.

Poachers began using the poison in 2013, when as many as 300 elephants died in Hwange National Park from salt pans laced with cyanide, according to elephant conservation groups.

Zimbabwe has a large elephant population of about 100,000, but the number has sharply declined in recent years.

Many vultures also died after feeding on the poisoned carcasses.

Also worrying to conservationists are reports that rangers have turned into accessories to poaching.

The country's rangers work under harsh conditions, without enough equipment to take on the increasingly sophisticated poaching syndicates, and also not being adequately remunerated.

It is these poor working conditions that could be fuelling the sharp rise in corruption within the national parks, as rangers are alleged to be assisting poachers to kill elephants for a fee.

Most of these rangers are employed by the ZPWMA.

There are also indications of more sophisticated syndicates conspiring to deplete the country's elephant herd.

Pole said the future of Zimbabwe's wildlife is not looking good unless authorities adopt a multidimensional approach to stemming the scourge.

"It is a bit sick. We have to diagnose the core problem and create a healthy wildlife sector. If we don't create a situation where communities benefit we are fighting a losing battle. We also have rhino poaching that is going on," he noted.

The amount of revenue the country is losing is much higher if losses from other animal and plant species were to be included.

Oppah Muchinguri-Kashiri, the Minister of Environment, recently said government was working around the clock to raise funding to protect wildlife.

The Environment Minister also raised concern over the country's ivory stockpile which is continuing to rise from many sources such as problem animals control and natural death.

Poachers have been spiking food and water with cyanide and leaving it as bait for the pachyderms.

"The crisis poses serious development, environmental and security challenges. It is pushing endangered species towards extinction. There are 83 000 elephants, and a large number of them continue to be prey to poachers," she said.

The country has stockpiled about 78 000kg of ivory worth US$12 million, mainly from natural deaths.

In July, wildlife officials in Zimbabwe requested the United States to reverse a ban on ivory imports it implemented a year ago citing concerns about the sustainability of the country's elephant population.

Zimbabwe's elephant-hunting industry generates US$14 million a year and helps control the population of 97,500 species that trample over trees and farmers' fields.

http://allafrica.com/stories/201511260514.html

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Regina Lennox
Conservation Force
3240 S. I-10 Service Rd. W., Suite 200
Metairie, Louisiana 70001 USA
504-837-1233 (office)
919-452-8652 (cell)
Regina.lennox@conservationforce.org

Attachments:

Presentation Ministers Committee - 12 Nov 2015.pptx	13.9 MB
Ministers Meeting (002).docx	19.7 KB

STAKEHOLDERS CONFERENCE ON MEASURES TO REDUCE WILDLIFE POACHING IN ZIMBABWE (MINISTER'S MEETING)

A Stakeholders Conference focused on measures to reduce wildlife poaching in Zimbabwe took place on 12th November in Harare. The meeting was called by the Minister of Environment, Water and Climate (Minister Mrs. Opah Muchinguri-Kashiri) as chairperson of a multi ministerial cabinet committee established to look into the current poaching crisis. AWF agreed to fund and organise this important conference. In attendance was the Minister of Environment, water and Climate; the Minister of Tourism and Hospitality and the Minister of Rural Development, Preservation of Culture and Heritage. Other delegates included the Permanent Secretaries from the Ministries of Environment and Agriculture, representatives from the Zimbabwe National Army, the Air Force, the Zimbabwe Republic Police, Rural District Councils, NGO's, industry and civil society. We were told to expect 60 people but a total of 95 people showed up. OPAH MUCHINGURI-KASHIRI took over the portfolio from Saviour Kasukuwere about 6 months ago, and so far she is being very open and reaching out for advice and input. As such everyone was relaxed, open and willing to participate. Some very pertinent aspects from poaching, management of the wildlife industry, the hunting and tour operators, Zim Parks and above all the communities' benefits were all discussed and solutions sought for each situation.

The Minister of Tourism gave an excellent presentation where, amongst other things he highlighted the dependence of the tourism industry in Zimbabwe (and Africa at large) on wildlife. He spoke about the fact that the country so far benefits just around 7% from Tourism, because maximum efforts have not been put to setup the tourism sector in the country. But that henceforth things will have to change, first by everyone uniting to fight poachers and also by ensuring Zimbabwe is known by the big international countries as a destination worth visiting.

Alistair was also one of the presenters and the main focus of his presentation was on the need to devolve authority to allow a vibrant wildlife industry to develop. He highlighted the need for the benefits from living with wildlife to outweigh the costs for both communities and private sector. Communities have to be given a greater sense of ownership or custodianship over their natural resources and that is the only way they will have an incentive to protect it.

Recommendations

- war has been declared on poachers
- To address the concerns of rangers on the ground by making donations for resources including food, water, bag packs, etc.
- Build trust among each other to tackle issues such as sports hunting, etc.
- Address the campfire situations affecting communities and also ensure they are benefiting from the industry, so that they are not helping poachers.
- Form a core team of all stakeholders and send them to neighbouring Botswana and Namibia where it is working for them to see how it's done and bring back findings for implementation in Zim. AWF is very much involved too as they assist with the funding too.
- There had been talks on the need to reform parts of the hunting industry in a workshop earlier in the year (prior to Cecil) and presently it is mostly just a case of implementing the

The minister requested that if possible these meetings be held once every month, or once in three months so that the points raised are continuously reviewed and corresponding actions taken towards their

fulfillment. This means that the future of the Wildlife Industry in Zimbabwe seems to have just risen from a very long slumber and everyone is ready to move.

This was the very first meeting of its kind and there is promise of significant changes and positive results for Zimbabwe's wildlife. Also the collaboration between the Ministers of Environment and Tourism was very encouraging, something that has not happened for a very long time. Our fingers are crossed and we will keep pushing for things to keep going forward from this point on in Zimbabwe as far as the wildlife Industry is involved.

What are next steps for AWF and Zimparks?

At the request of the permanent secretary in the Min. of Environment, Alistair who is the Director for Land and Habitat Management, AWF established an advisory committee for him and the Minister called the environment and wildlife advisory committee (EWAC). This committee has as members Alistair Pole as chairperson and other prominent people in the environmental industry including Clive Stockil, Prof. David Cumming. Daudi Sumba, vice president for program Design and Public relations, AWF was present and took part in the inauguration of this committee in Zimbabwe. Also, AWF has agreed to provide some basic funding for the operations of this committee. All this is helping to give AWF more footage as advisor with the Ministry of Environment and technical support with Zim Parks for increasing influence in Zimbabwe.

Overview of the Wildlife Industry and Issues for Zimbabwe

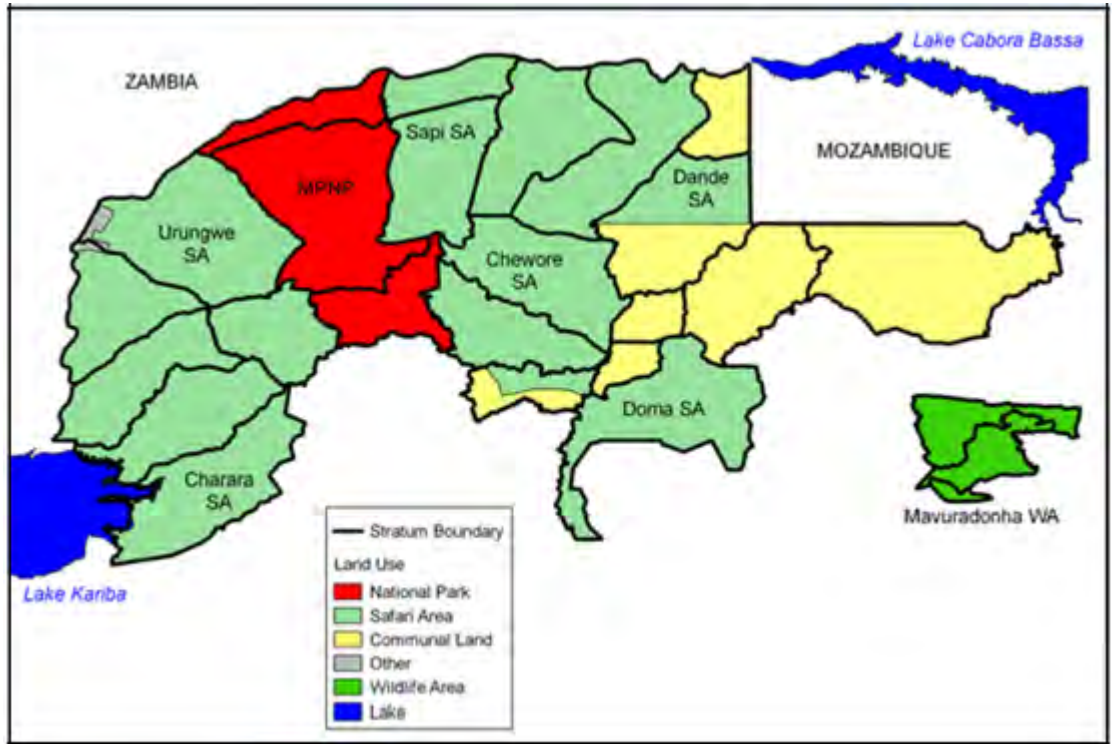
AFRICAN WILDLIFE FOUNDATION®

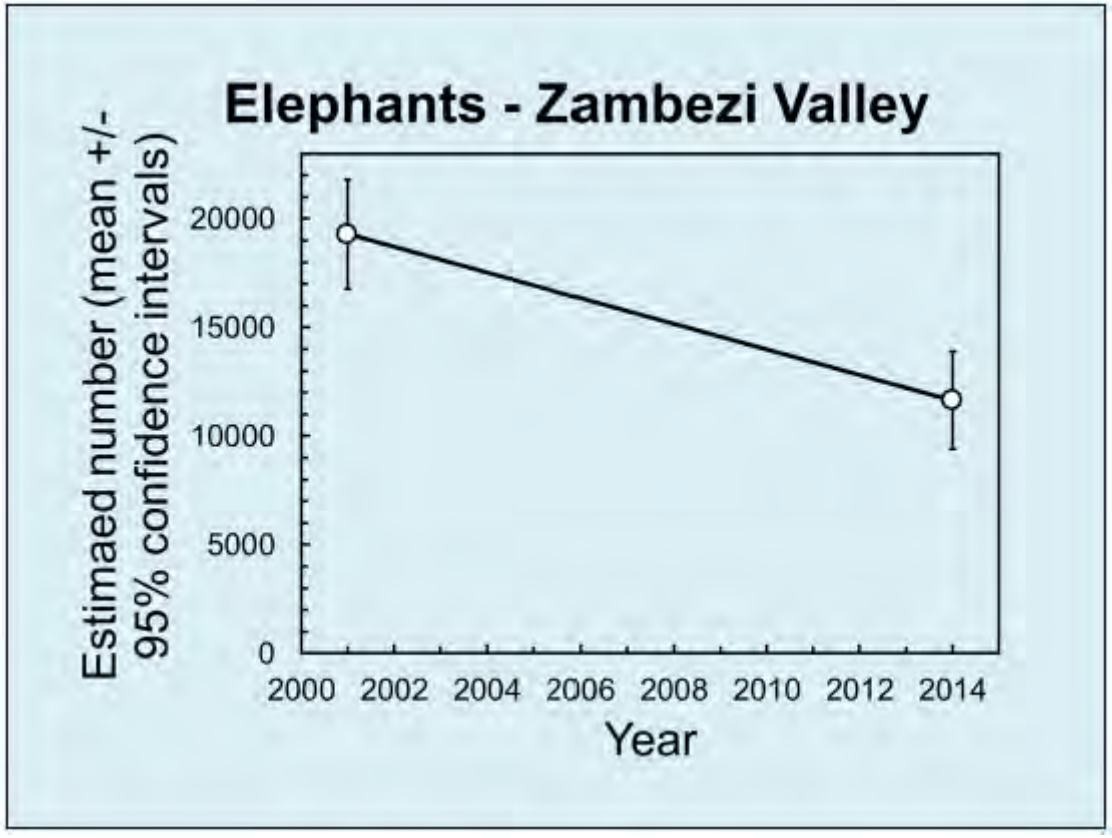
Environment and Wildlife
Advisory Committee

1. Immediate intervention which aims to catch, prosecute and deter poachers and poaching

2. Create the right environment for communities, private sector and the nation at large to benefit from the wildlife resources so they are seen as assets

Immediate Interventions





Population decreased by 7000 over 13 years

Add in expected population growth, the loss is anywhere from **20,000 to 34,000** elephant

CRIME SCENE DO NOT CROSS

Information is the most effective investment of funds and time in anti-poaching efforts

Well trained and equipped ‘Boots on the Ground’

Technology can play an important role in improving effectiveness but can also be a distraction – Be careful!

Treating a Symptom

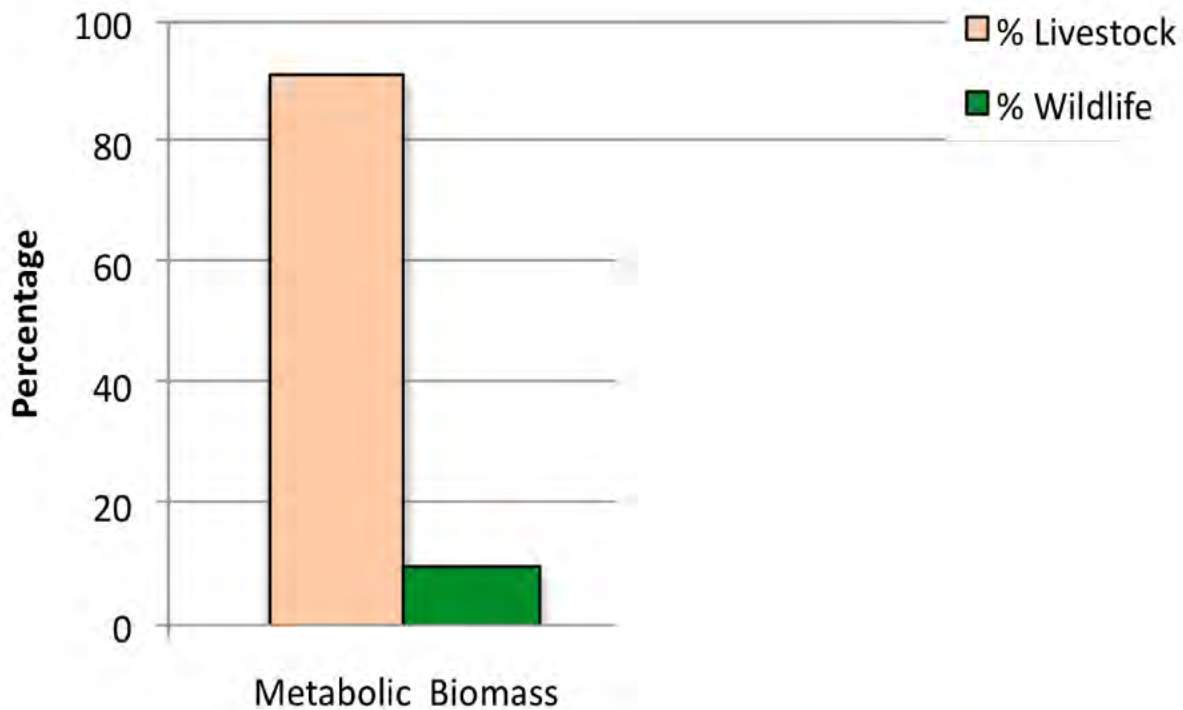
For the long term, we have to diagnose the core problems and create a **HEALTHY** wildlife sector

Wildlife has to be seen as a resource in which the benefits generated are **greater** than the costs.

Cost Benefits of Wildlife

- There are very real costs to living with Wildlife
- Very few countries have achieved benefits from wildlife at the local level that are greater than the costs incurred.
- Centralised control and ownership has largely failed
- In Africa, the only countries that have achieved increasing wildlife populations are those that have empowered communities and landowners as **custodians** of the wildlife with broad **user rights**
- Only three countries in Africa have achieved increasing wildlife populations in last 30 years: South Africa, Namibia, Zimbabwe

Contribution of domestic & wildlife large mammal biomass to GDP in Southern Africa



Rates of growth:

Livestock 2 – 3% pa Nature based tourism 5 – 15% pa

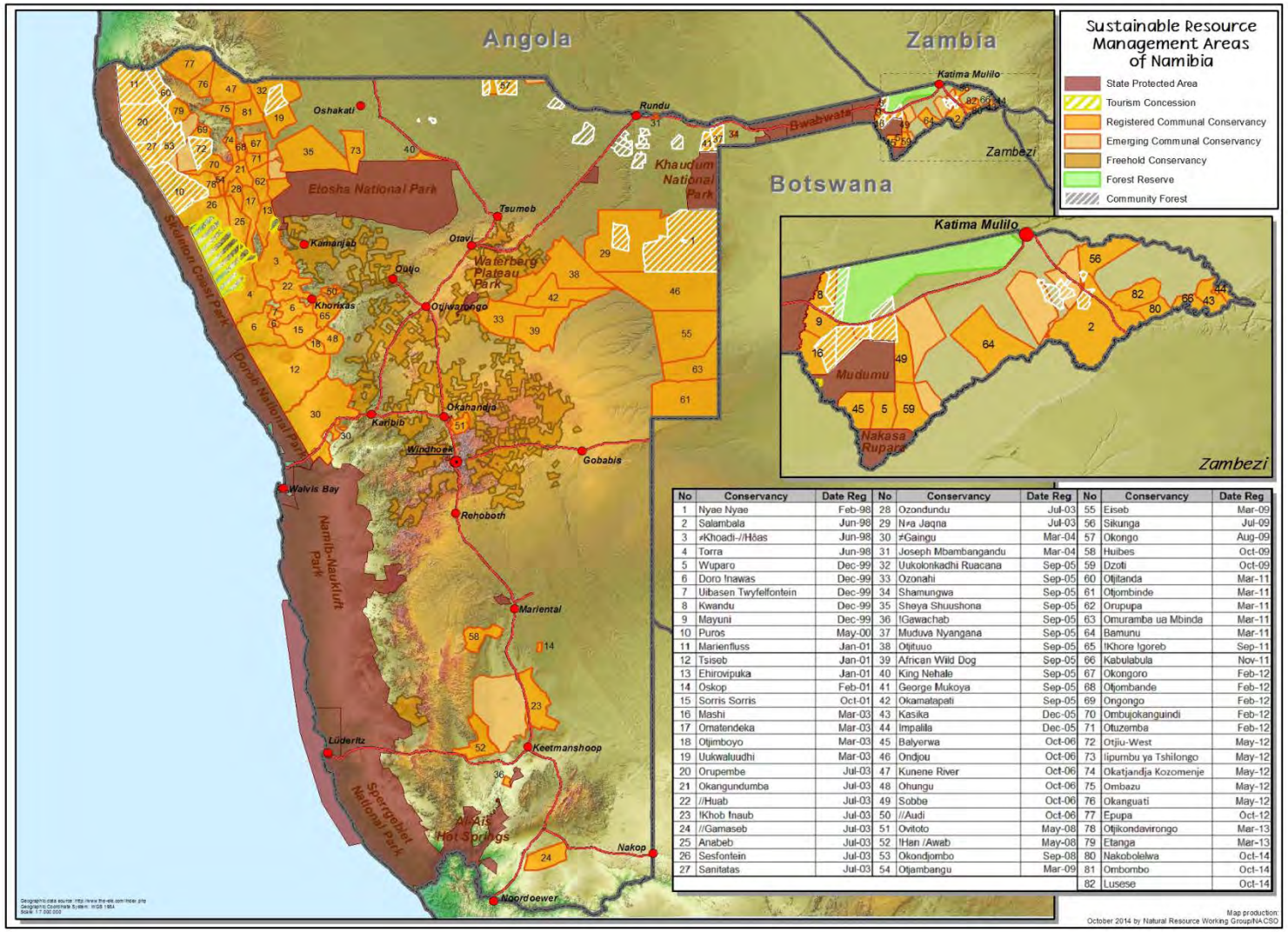
Support to Livestock > wildlife sector

Why do we place so many restrictions on the production and trade of wildlife as a resource?

SOUTH AFRICA

- In 1960, 557,000 large mammals were counted in the whole of South Africa
- There were only 3 operating private game farms.
- Today in 2015 the total “National Wildlife Herd” counts closer to 25 million animals.
- This indicates an annual growth rate of 7.2%
- Game Ranches cover 16.8% of land mass (National Parks 6.1%)
- Industry is estimated to be worth R10 billion
- 20% of red meat eaten in SA is game meat

NAMIBIA



No	Conservancy	Date Reg	No	Conservancy	Date Reg	No	Conservancy	Date Reg
1	Nyae Nyae	Feb-98	28	Ozondundu	Jul-03	55	Eiseb	Mar-09
2	Salambala	Jun-98	29	N≠a Jaqna	Jul-03	56	Sikunga	Jul-09
3	≠Khoadi-//Hôas	Jun-98	30	≠Gaingu	Mar-04	57	Okongo	Aug-09
4	Torra	Jun-98	31	Joseph Mbambangandu	Mar-04	58	Huibes	Oct-09
5	Wuparo	Dec-99	32	Uukolonkadhi Ruacana	Sep-05	59	Dzoti	Oct-09
6	Doro !naxas	Dec-99	33	Ozonahi	Sep-05	60	Otjitanda	Mar-11
7	Uibasen Twyfelfontein	Dec-99	34	Shamungwa	Sep-05	61	Otjombinde	Mar-11
8	Kwandu	Dec-99	35	Sheya Shuushona	Sep-05	62	Orupupa	Mar-11
9	Mayuni	Dec-99	36	!Gawachab	Sep-05	63	Omuramba ua Mbinda	Mar-11
10	Puros	May-00	37	Muduva Nyangana	Sep-05	64	Bamunu	Mar-11
11	Marienfluss	Jan-01	38	Otjituuo	Sep-05	65	!Khore !goreb	Sep-11
12	Tsiseb	Jan-01	39	African Wild Dog	Sep-05	66	Kabulabula	Nov-11
13	Ehirovipuka	Jan-01	40	King Nehale	Sep-05	67	Okongoro	Feb-12
14	Oskop	Feb-01	41	George Mukoya	Sep-05	68	Otjombande	Feb-12
15	Sorris Sorris	Oct-01	42	Okamatapati	Sep-05	69	Ongongo	Feb-12
16	Mashi	Mar-03	43	Kasika	Dec-05	70	Ombujokanguindi	Feb-12
17	Omatendeka	Mar-03	44	Impalila	Dec-05	71	Otuzemba	Feb-12
18	Otjimboyo	Mar-03	45	Balyerwa	Oct-06	72	Otjiu-West	May-12
19	Uukwaluudhi	Mar-03	46	Ondjou	Oct-06	73	Iipumbu ya Tshilongo	May-12
20	Orupembe	Jul-03	47	Kunene River	Oct-06	74	Okatjandja Kozomenje	May-12
21	Okangundumba	Jul-03	48	Ohungu	Oct-06	75	Ombazu	May-12
22	//Huab	Jul-03	49	Sobbe	Oct-06	76	Okanguati	May-12
23	!Khob !naub	Jul-03	50	///Audi	Oct-06	77	Epupa	Oct-12
24	//Gamaseb	Jul-03	51	Ovitoto	May-08	78	Otjikondavirongo	Mar-13
25	Anabeb	Jul-03	52	!Han /Awab	May-08	79	Etanga	Mar-13
26	Sesfontein	Jul-03	53	Okondjombo	Sep-08	80	Nakobolelwa	Oct-14
27	Sanitatas	Jul-03	54	Otjambangu	Mar-09	81	Ombombo	Oct-14
						82	Lusese	Oct-14

Map production:
October 2014 by Natural Resource Working Group/NACSO

- Introduced new legislation in 1996 which gave use rights to communities
- Land under wildlife in Namibia now stands at **44%:**
  - 19.8% communal conservancies (161,900 km²);
  - 16.8% National Parks (136,800 km²);
  - 6.1 % Freehold conservancies (34,600 km²);
  - 0.8% State Tourism Concessions
- Conservancies directly support 189,372 people or 8.1% of the country's population.
- The elephant population has grown from 7,500 in 1995 to over 20,000 today;
- Largest free ranging population of black rhino outside National Parks

Zimbabwe – A Historical Leader

- One of the first countries in the world to develop local custodianship of wildlife with user rights
- Initially benefitting the private sector
- In 1981, CAMPFIRE programme drawn up
- 7 years later, in 1989, it was finally approved
- The success of the 1975 Parks Act and CAMPFIRE created a model that many other countries have emulated

Zimbabwe – What was Achieved?

- 27,000km^2 of private land under wildlife by 1999
- Over 90% of RDC's had a CAMPFIRE programme by 2000
- Over 35% of Zimbabwe's land mass was actively involved in wildlife
- Wildlife sales were common
- We were exporting wildlife to neighbouring countries

Zimbabwe - Decline

- Statutory Instrument 26 of 1998
- Failure of CAMPFIRE to ensure benefits reaching communities
- Missed opportunities within the Land Reform Programme

Zimbabwe – The Future

Reinstate a level of custodianship over wildlife to the local level and give communities and land owners broad user rights

Policy review

We need to review the needs and efficiencies of:

- Private Wildlife Sector
- Community wildlife Programmes
- PWMA

Brave Leadership

Do not let the few that break rules prevent the majority from benefitting

There is
ENORMOUS
Potential

Gmail

Regina Lennox <regina.lennox.cf@gmail.com>

Fwd: Zimbabwe -- CAMPFIRE Hunting Income Analysis

John J. Jackson, III <jjj@conservationforce.org> Fri, Mar 24, 2017 at 1:04 PM
To: Regina Lennox <regina.lennox@conservationforce.org>

-------- Forwarded Message --------
Subject: Zimbabwe -- CAMPFIRE Hunting Income Analysis
Date: Tue, 1 Dec 2015 12:18:18 -0600
From: Regina Lennox <regina.lennox@conservationforce.org>
To: 'Vannorman, Tim' <tim_vannorman@fws.gov>, Rosemarie_Gnam@fws.gov, bryan_arroyo@fws.gov, dan_ashe@fws.gov, craig_hoover@fws.gov
CC: 'John J. Jackson, III' <jjw-no2@att.net>

Dear Tim,

Attached please find an analysis of income to CAMPFIRE districts from safari hunting, with elephant hunting broken out separately.

The graph on page 5 reflects reduced income from hunting in 2014 compared to 2012 and 2013, and the chart on page 7 reports reduced quota utilization.

Please let us know if you have any questions.

Kind regards,

Regina

Regina A. Lennox

Conservation Force

3240 S. I-10 Service Rd. W., Suite 200

Metairie, Louisiana 70001

Tel: (504) 837-1233

regina.lennox@conservationforce.org

CAMPFIRE HUNTING INCOME ANALYSIS.PDF
522K

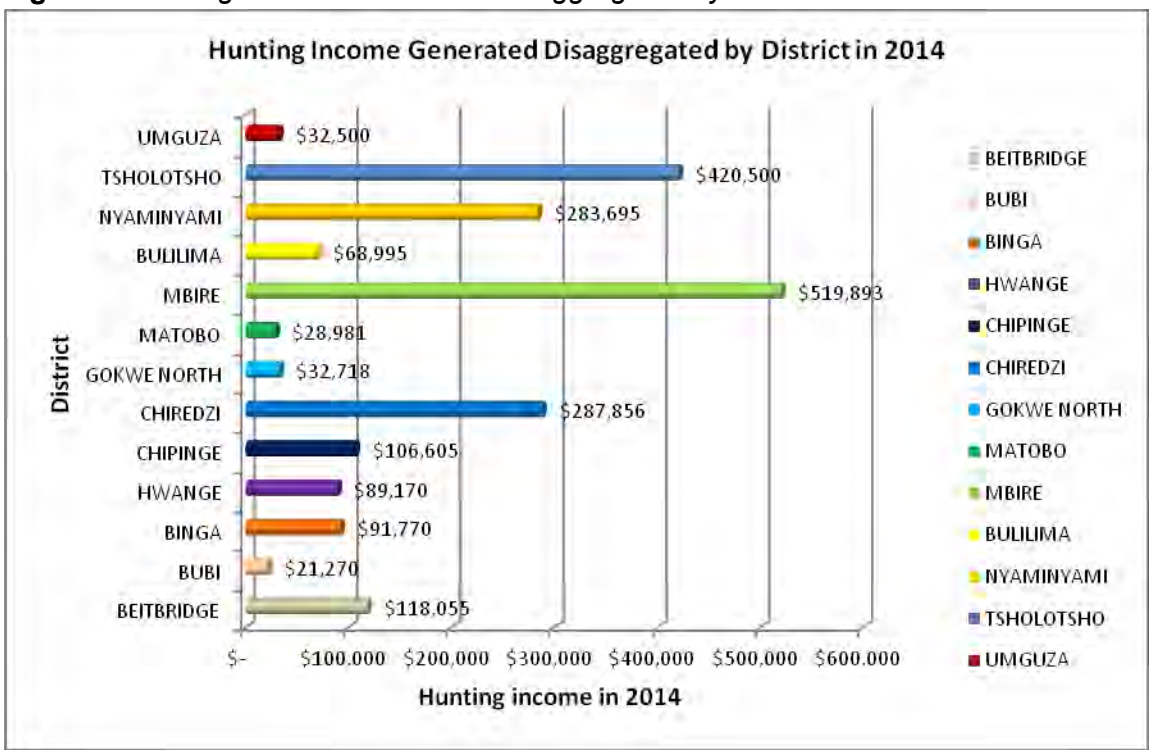
CAMPFIRE HUNTING INCOME AND DISTRIBUTION

The information in this report is based on verifiable CAMPFIRE district records as at 30th October 2015. Contact campfire@ecoweb.co.zw

Income Generated from Hunting

In 2014, Community Areas Management Programme for Indigenous Resources (CAMPFIRE) generated a total net hunting income of US$2,102,007 in 13 districts of Zimbabwe that hunt most species, including elephant. The income generated disaggregated by district is shown in Figure 1. Bubi district recorded the lowest income of US$21,270 whilst Mbire district had the highest amount of US$519,893. Average income generated per district in 2014 is US$161,692.85.

Figure 1: *Hunting Income Generated Disaggregated by District in 2014*



The major hunted species is elephant, which contributed 54% (US$1,138,375.09) of the total income. Only Matobo district did not generate any income from elephant hunting, with Hwange district getting 100% of its income from elephant as shown in Table 1.

Table 1: *Income generated by Elephants vs. Total Income; and Percentage Income*

DISTRICT	Total Income	Income from Elephants	Percentage Income
Beitbridge	118,055.00	60,600.00	51%
Bubi	21,270.00	16,000.00	75%
Binga	91,770.00	30,000.00	33%
Hwange	89,170.09	89,170.09	100%
Chipinge	106,604.52	27,000.00	25%
Chiredzi	287,856.00	226,500.00	79%
Gokwe North	32,717.50	4,000.00	12%
Matobo	28,981.00	-	0%
Mbire	519893.00	161,405.00	20%
Bulilima	68,995.00	53,000.00	77%
Nyaminyami	283,695.00	59,200.00	21%
Tsholotsho	420,500.00	381,500.00	91%
Umguza	32,500.00	30,000.00	92%
Total	**2,065,161.61**	**1,072,170.09**	**54%**

Distribution of Income Generated from Trophy Hunting

All income generated was distributed to three constituencies, namely (a) Communities; (b) Rural District Councils (RDCs) and (c) CAMPFIRE Association (CA). Figure 2 and 3 show the income and percentage distribution to three beneficiaries. The biggest chunk (52%, close enough to the prescribed 55%) of the hunting income went to the communities, in line with the CAMPFIRE objectives of ensuring that communities in hunting areas must be the biggest beneficiaries of hunting income. Councils also earned a significant percent of 44% (against 41%), for field patrols, monitoring of hunts, problem animal control, water, and fire management, and this represents major income to some council budgets that have a limited income base for district development (Mbire, Nyaminyami, Tsholotsho, etc). CA received 4% of the total income to cover administration costs and representation of the programme.

Figure 2: *Total Hunting Allocations to Communities, Councils and CA in 2014*

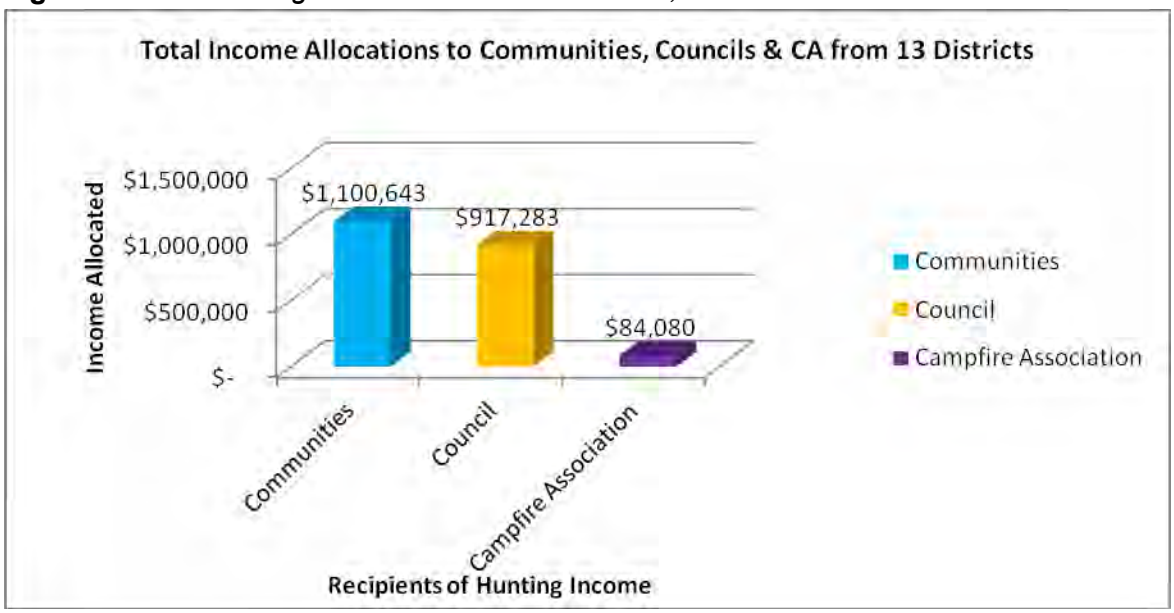
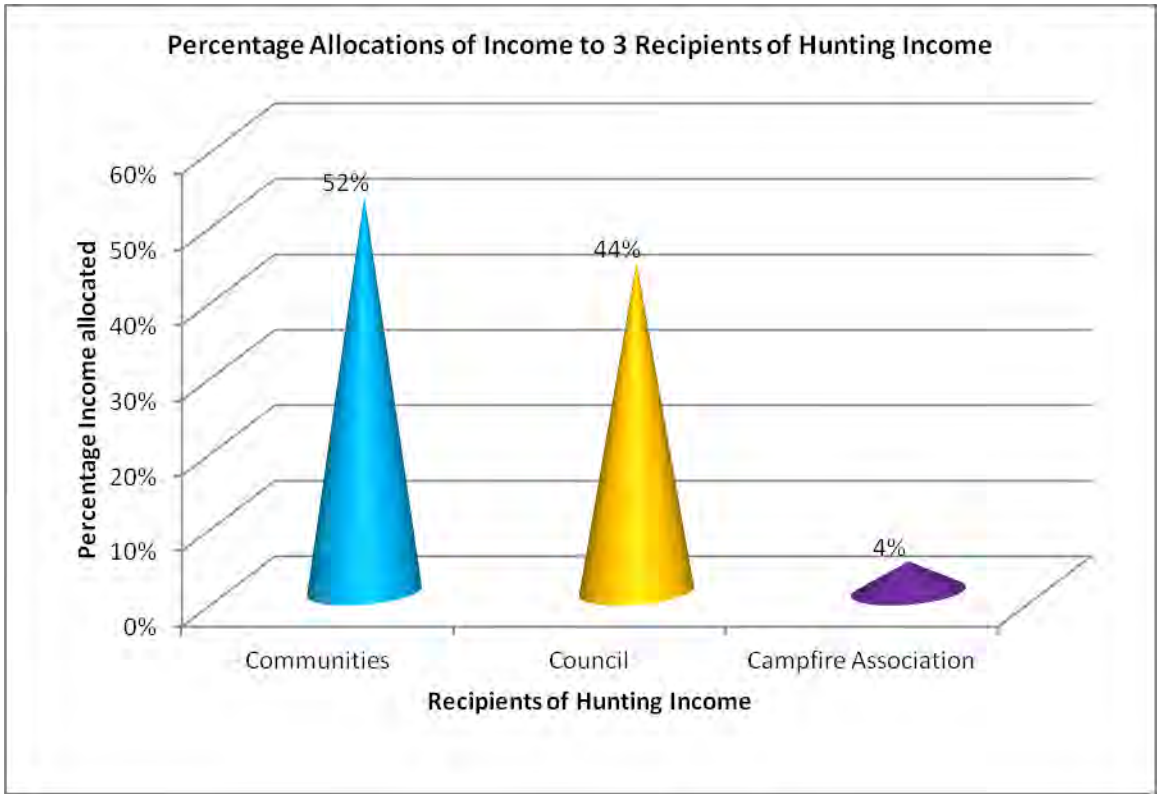


Figure 3: *Percentage Distribution of the Hunting Income in 2014*



Hunting income distribution proportions to the 2 recipients (Communities and Councils) varies from district to district. Communities got the highest allocation of hunting income in Tsholotsho and Umguza districts, with the communities getting 60% and Councils 36%. In 4 districts,

namely Bubi, Binga, Hwange and Chipinge, communities got 55% and council 41% of the hunting income. In 5 districts namely, Chiredzi, Gokwe North, Matobo, Mbire and Bulilima communities got 50% and councils 46%. In Nyaminyami, communities (49%) got slightly above Councils (47%), to due a temporary suspension of CAMPFIRE Revenue Sharing Guidelines by the district. Finally, Beitbridge is the only district in which the Council's (53%) was more than communities (43%), a major departure from CAMPFIRE Revenue Sharing Guidelines. The income distributed in each of the districts and the percentage allocations per district are shown in Figure 4 and 5, respectively.

Figure 4: *Hunting Allocations in 13 Districts to 3 Beneficiaries*

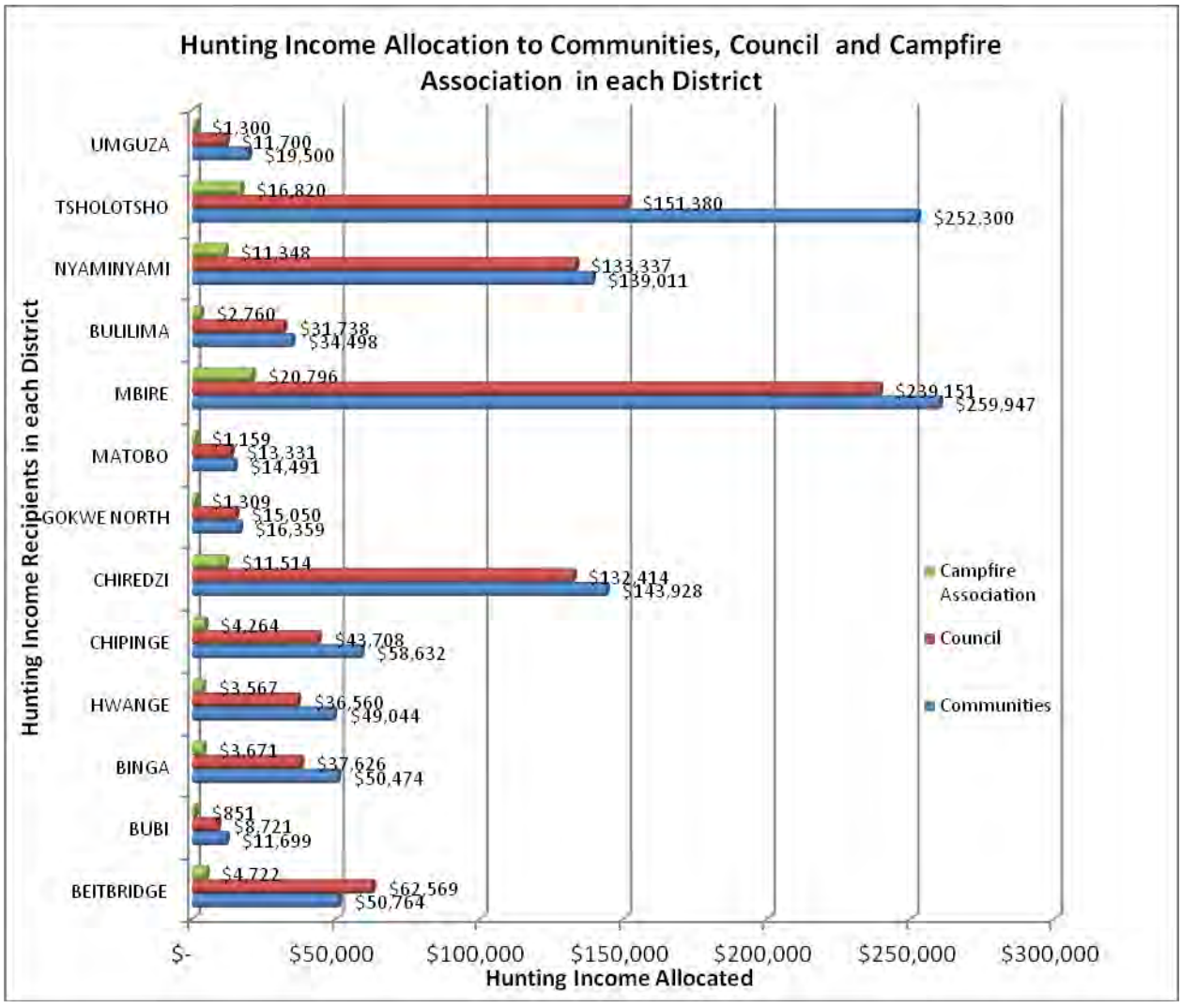


Figure 5: *Percentage Hunting Allocations in 13 Districts to 3 Beneficiaries*

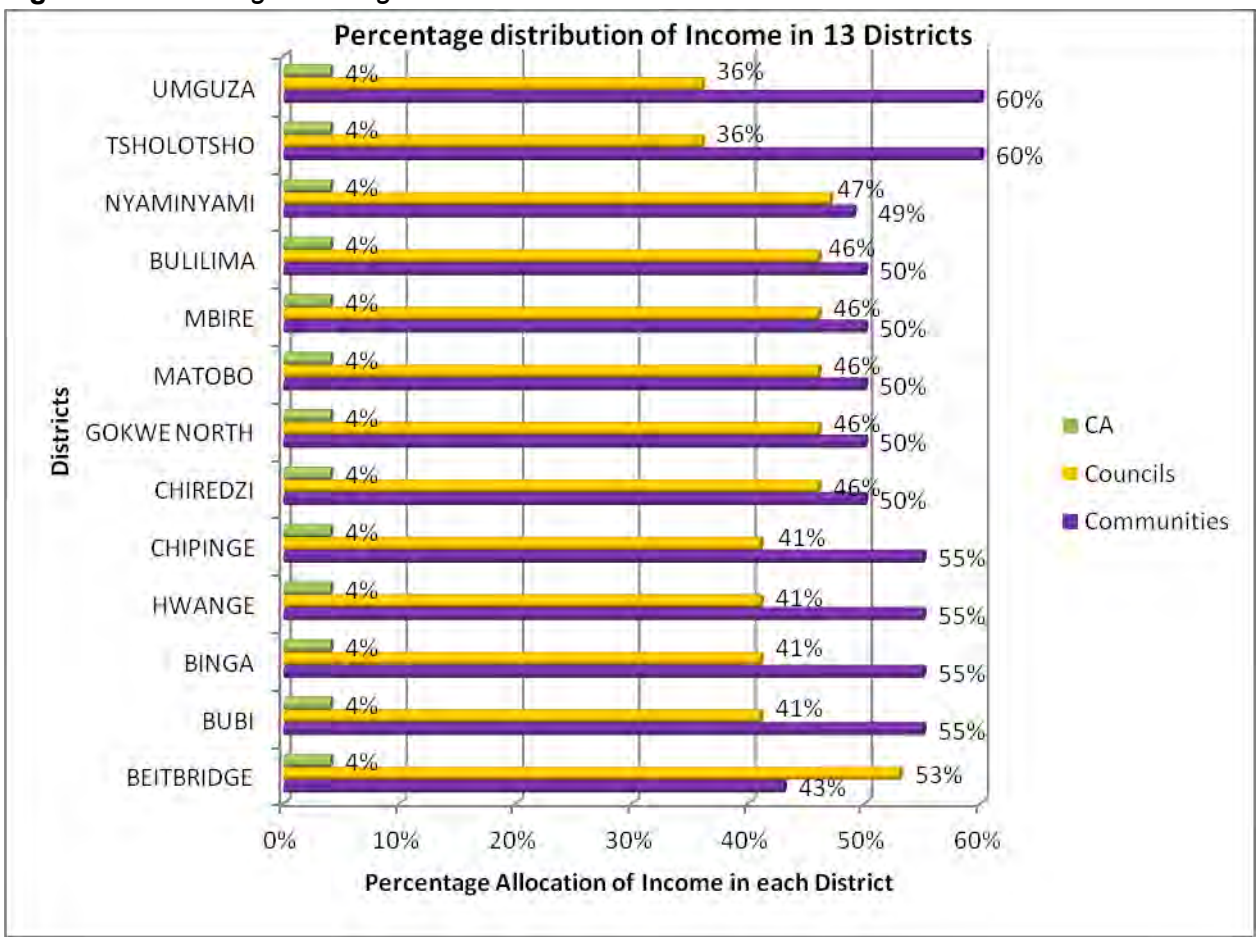
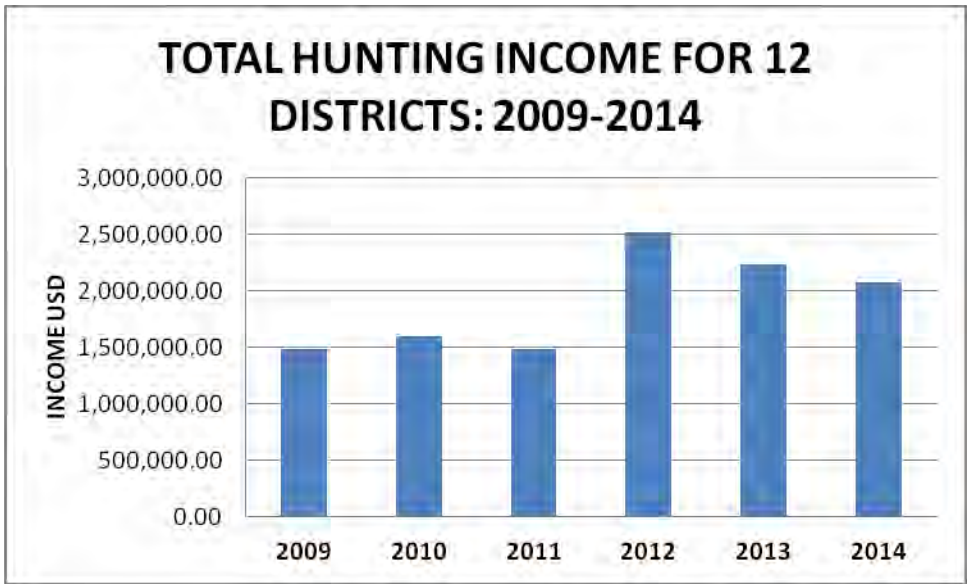


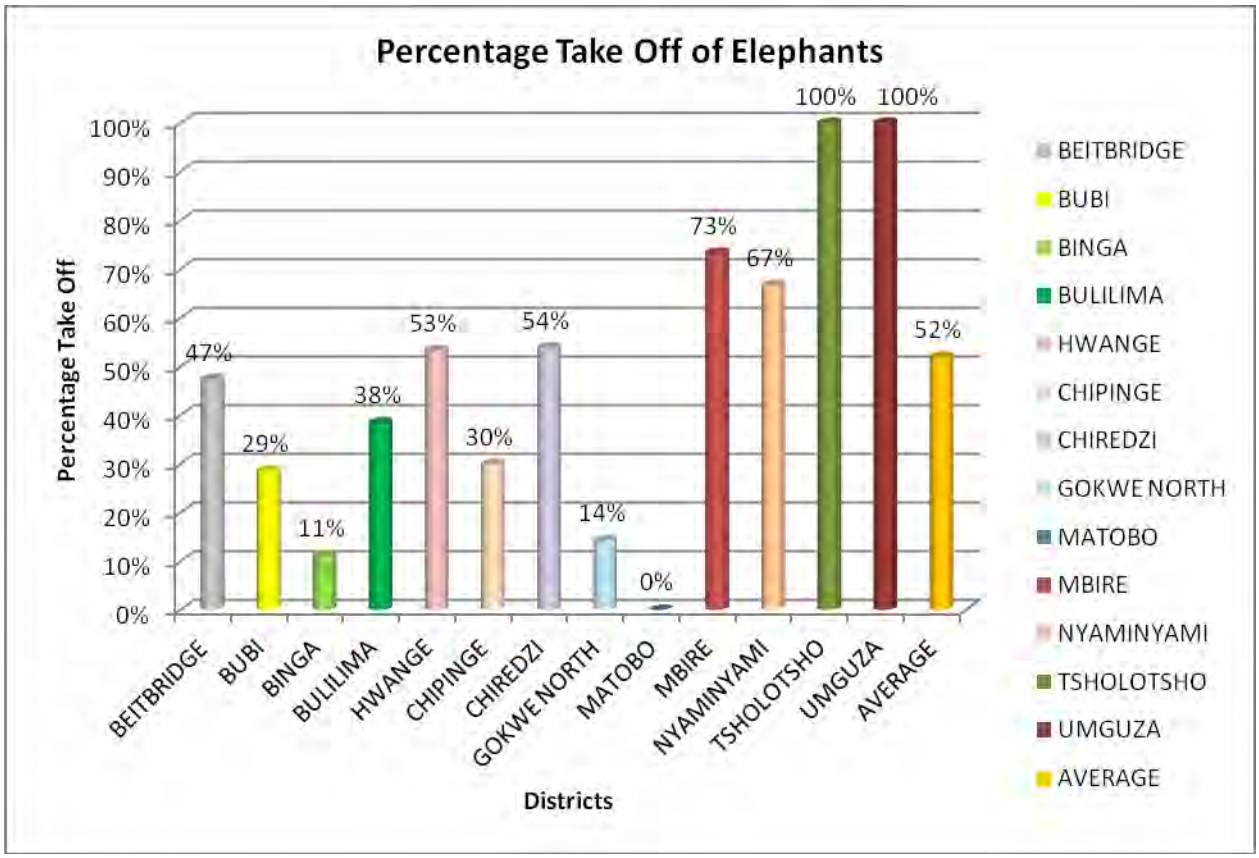
Figure 6: *Total Hunting Income for 12 Districts: 2009-2014*



Variation of Total Hunting Income: 2009-2014

As shown in Figure 6, it is highly probable that the decline in hunting income for 2014 was largely caused by the suspension of trophy imports by United States of America. The suspension has a lag effect on income, and preliminary calculations of earnings for 2015 indicate a further continuing decline.

Figure 6: *Take Off Rate in 13 districts*



The major contributor to hunting income, elephants, had a 52% off-take rate in the 13 districts (animals hunted vs the quota). Seven districts out of 13 had an elephant off-take rate below 50% as shown in Figure 6. Figure 7 shows the numerical quota and take-off per district, including tusk-less elephant.

Figure 7: *Numerical Elephant Quota and Take Off per District*

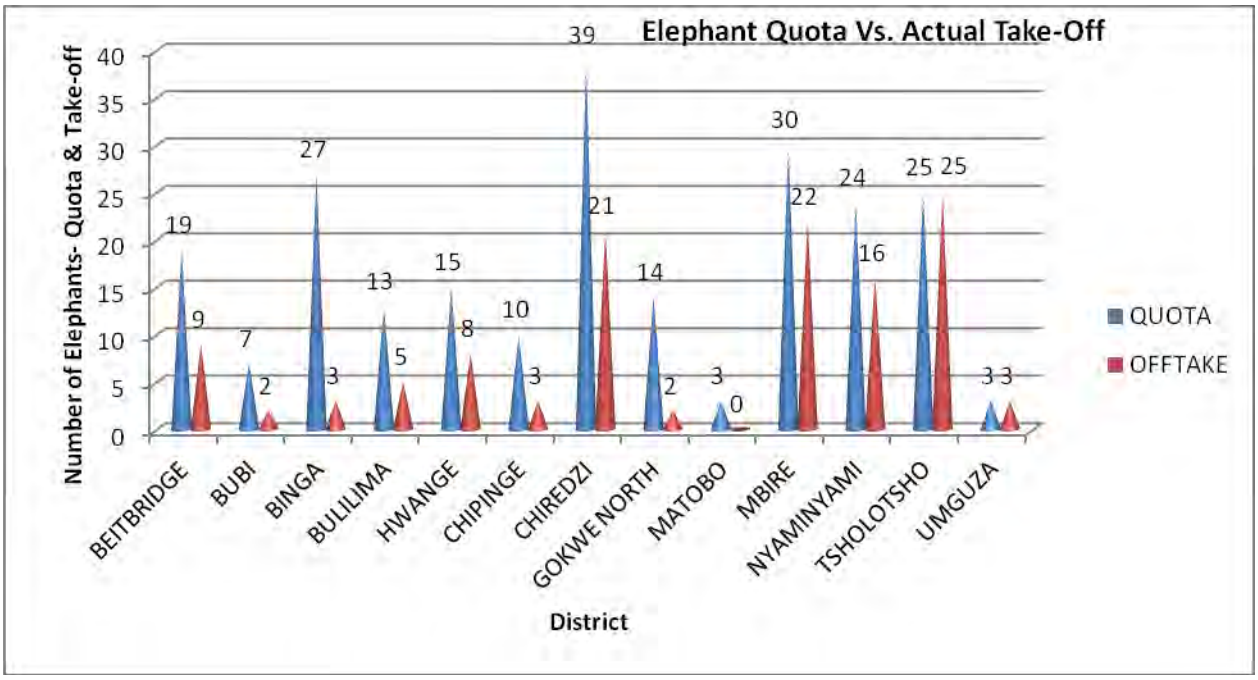


Table 2: *Examples of Community Projects funded from CAMPFIRE Revenue: 2010-14*

District	Project
Beitbridge	Rehabilitation of schools, clinics and protection of irrigation schemes
Bililima	Rehabilitation of 3 clinics and 3 primary schools, hall, fencing of fields and rehabilitation of lodge
Binga	Schools, clinics, and sub offices for wildlife monitoring
Chipinge	3 grinding mills, lorry, teachers houses, community office, shop
Chiredzi	Clinic, teachers' houses, primary school, community-grinding mill, Police sub-office, piped water and electrification of clinic.
Mbire	Clinic, nurses houses, office, storerooms, 14 classrooms, 7 teachers houses, grinding mill, school office, wildlife administration offices, 2 hand pump bore holes, water pipes, toilet, water storage tanks, 2 tractors, a tourist camp with 4 chalets;
Nyaminyami	Tillage tractors, renovation of dispensary at clinic, nurse's house. Construction of Mayovhe classroom block, 3 grinding mills, Teacher's house, Jongola school. School bursaries x 3 students at Seke Teacher's College. Renovation of pre-schools x 2. Negande: Rehabilitation of water pipeline, grinding mill. Nebiri: Chikuro primary block, rehabilitation of Harudziva water pipeline. Kasvisva: Rehabilitation of water pipeline to supply water to Kasvisva clinic, Kasvisva Secondary school block. Msampa: Teacher's house, Majazu primary, renovation of ward warehouse; Kanyati: Cement for teacher's house renovation.
Tsholotsho	Classroom blocks and furniture (Sihazela, Mlevu, Mtshwayeli, Ntulula,

	Dibutibu, Gwaai, Nkwizhi, Zibalongwe, Malindi, Mgodimasili, Phelela, Mpilo, Jimila, and Kapane Primary schools), 2 F14 cottages, 10 sewing machines (Dibutibu Secondary school), 7km piped water system for Thembile primary school, Sikente Clinic, Tshitatshawa and Jowa clinics construction, fencing of Madlangombe clinic, 10 water engines, borehole drilling and repairs and repair kits, Lister diesel engines for 6 villages in ward 21 and at Sihazela Line in ward 1, grinding mills, solar water pumping in wards 1, 2 and 4. 2 pickup trucks for wildlife monitoring purchased in 2015.

Table 3: *Scope of the CAMPFIRE Program*

Land area under CAMPFIRE	50,000 km^2 – 12% of Zimbabwe
No of CAMPFIRE Districts	58
No of wildlife districts	28
No of Safari Operators	33
No of Photographic safaris	10
Direct and indirect beneficiaries	2, 5 million people

Gmail

Regina Lennox <regina.lennox.cf@gmail.com>

Fwd: Zimbabwe -- Anti-Poaching / Zambezi Valley EMP Implementation

John J. Jackson, III <jjj@conservationforce.org> Thu, Apr 6, 2017 at 3:54 PM
To: Regina Lennox <regina.lennox@conservationforce.org>

-------- Forwarded Message --------
Subject: Zimbabwe -- Anti-Poaching / Zambezi Valley EMP Implementation
Date: Thu, 3 Dec 2015 10:26:38 -0600
From: Regina Lennox <regina.lennox@conservationforce.org>
To: 'Vannorman, Tim' <tim_vannorman@fws.gov>
CC: 'John J. Jackson, III' <jjw-no2@att.net>, bryan_arroyo@fws.gov, dan_ashe@fws.gov

Dear Tim,

Attached please find reports of anti-poaching missions taking place in the area surrounding Mana Pools National Park. These patrols are examples of implementation of the Mana Pools Anti-Poaching Strategy, part of the Zambezi Valley Elephant Management Plan. They are more than "bright spots." They represent an on-going and concerted public-private partnership among NGOs, safari operators, and ZPWMA. They serve as a model which is being developed in other ranges including Sebungwe.

Please let us know if you have any questions.

Kind regards,

Regina

Regina A. Lennox

Conservation Force

3240 S. I-10 Service Rd. W., Suite 200

Metairie, Louisiana 70001

Tel: (504) 837-1233

regina.lennox@conservationforce.org

5 attachments

20151127_Mana #2_HS.pdf
2529K

LZWSG OPERATIONS LOG.pdf
230K

ANTI POACHING INITATIVE SUMMARY 26-11-15(1).pdf
331K

ANTI POACHING INITATIVE SUMMARY 27-11-15(1).pdf
599K

ANTI POACHING INITATIVE SUMMARY 25-11-15 (2).pdf
405K

14th AFRICAN WILDLIFE CONSULTATIVE FORUM

Impacts of the African Elephant Importation ban on the CAMPFIRE Programme in Zimbabwe

Charles Jonga
CAMPFIRE Association
Zimbabwe

11 November 2015

Legend Resort, South Africa

PERCEPTIONS ON COMMUNITY BENEFITS

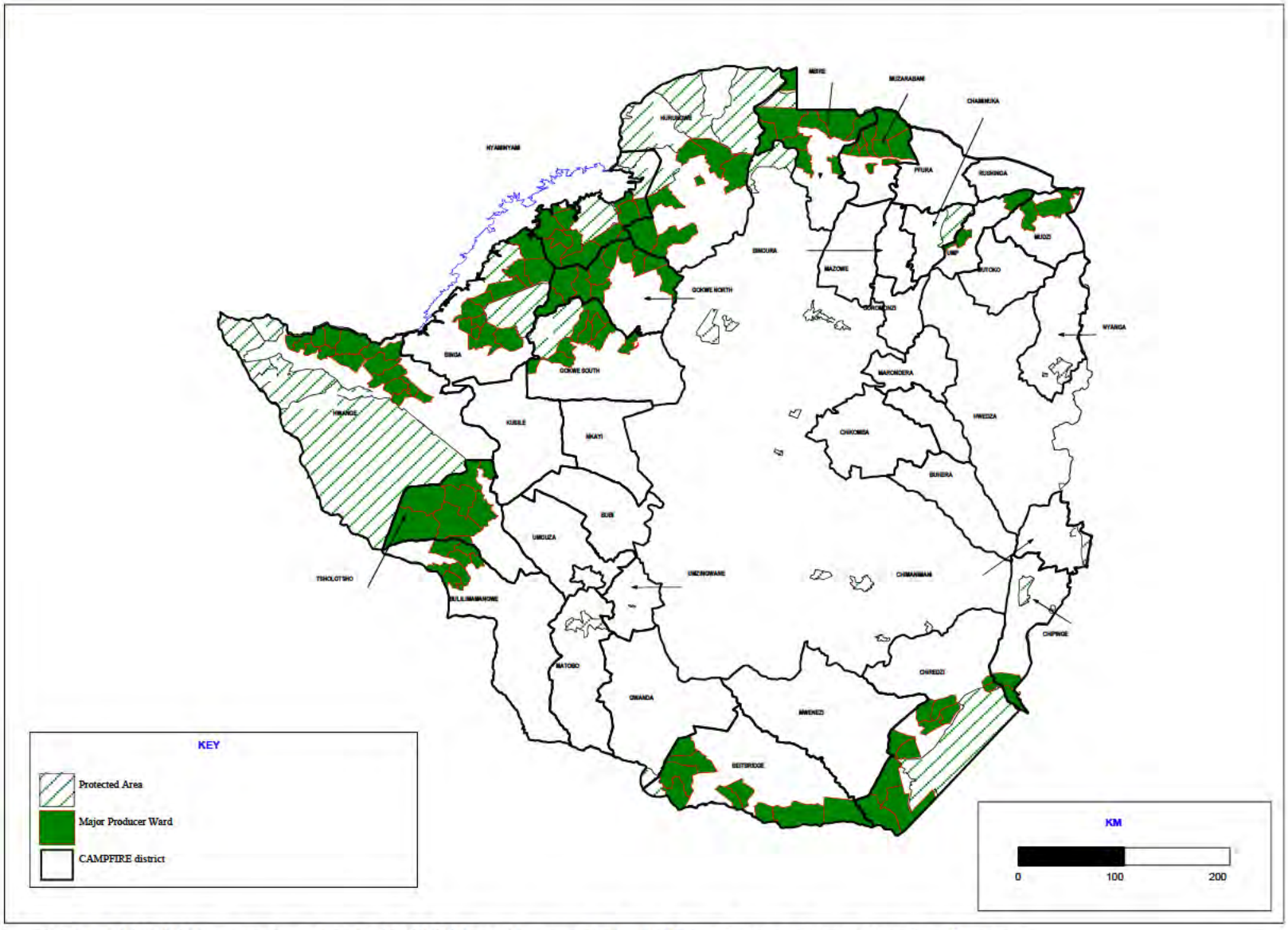
The Sunday Mail
25 October 2015

Journalist:
Another cause for the human-animal conflict could the transition from CAMPFIRE benefits. **In the old days, each household would receive a direct cash payment from the proceeds from hunting concessions. This has since been changed and the money is allocated to community programmes.**

Chief's response:
"With the allocation from CAMPFIRE, we have managed to build **a house for an extension officer, service our tractor, buy computers for the CAMPFIRE office, service community boreholes as well as offer funeral assistance to villagers**," explains Chief Chapoto.

Journalist:
Though villagers did not, and could not, open up on the snaring of animals, **there is suspicion that some might not see value in the community benefits, rather preferring personal gain**. Most of the blame is heaped on the Doma people, who until recently led a nomadic lifestyle and survived on hunting and gathering.

MAP OF CAMPFIRE DISTRICTS



CAMPFIRE protects 50,000km2 or **12.7 %** of land in Zimbabwe

BACKGROUND TO CAMPFIRE

- Land area under CAMPFIRE	50,000 km^2
- No. of wildlife districts	28
- No. of leased Parks safari areas	4
- No. of major elephant hunting districts	12
- Total no. of Safari Operators	33
- No. of Photographic safaris	10
- No of beneficiaries	120 wards 777,000 households

ALLOCATION OF CAMPFIRE REVENUE

New CAMPFIRE Revenue Sharing Guidelines - revenue is paid by Safari Operators directly into community controlled bank accounts, not through RDCs. CAMPIRE areas receive 100% of trophy fees for all animals hunted.

Communities receive 55% of CAMPFIRE income for their projects.

41% is used by Rural District Councils for field patrols, monitoring of hunts, problem animal control, water, fire management, and district development.

CAMPFIRE Association receives 4% to coordinate the programme and represent its interests at all levels.

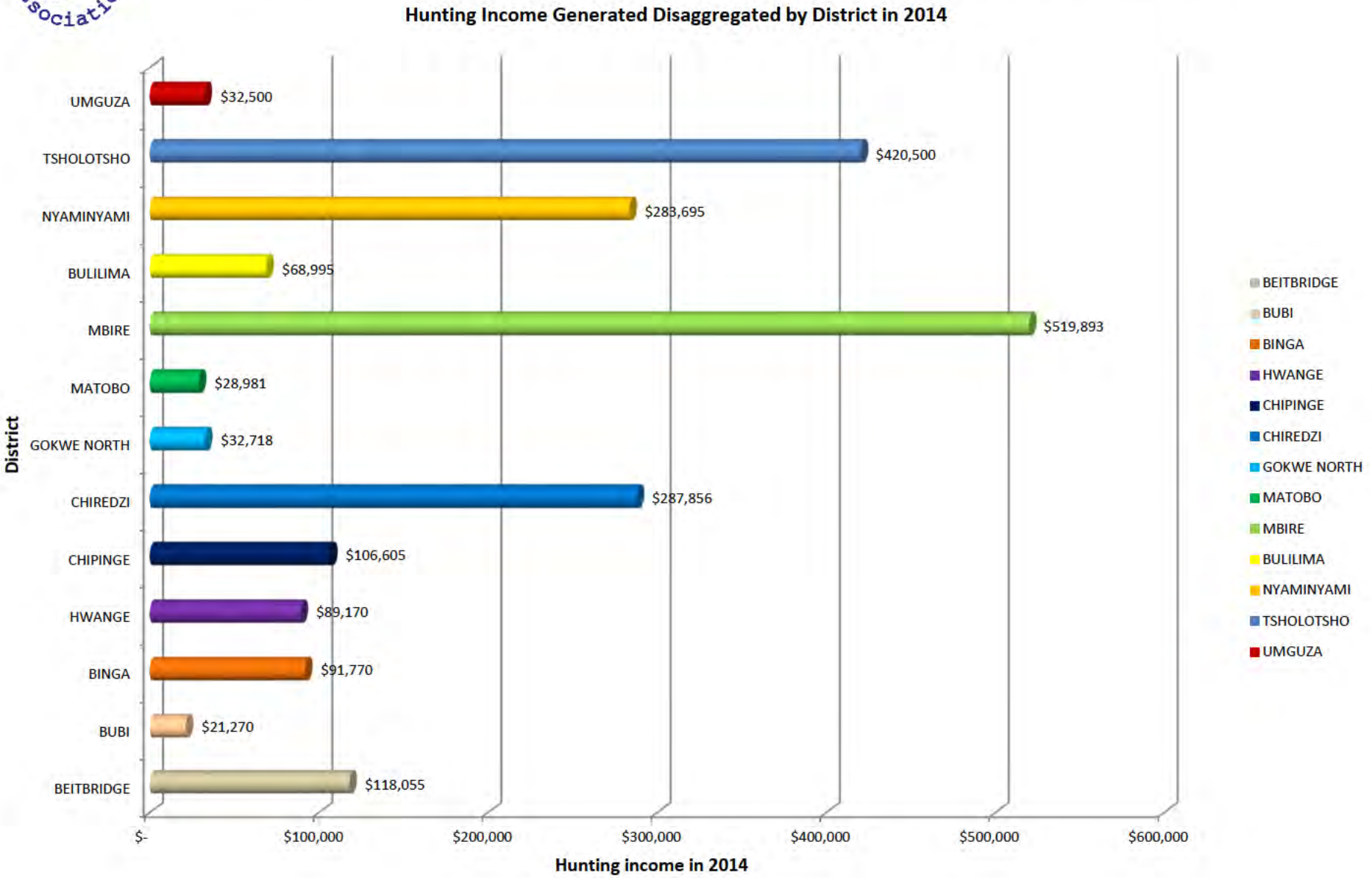
Parks also benefits in three CAMPFIRE districts that, in addition to normal (communal land) hunting areas in their environs, lease safari hunting areas (state land/Parks Estate) from Parks:

Chiredzi (Malipati Safari Area) 50%

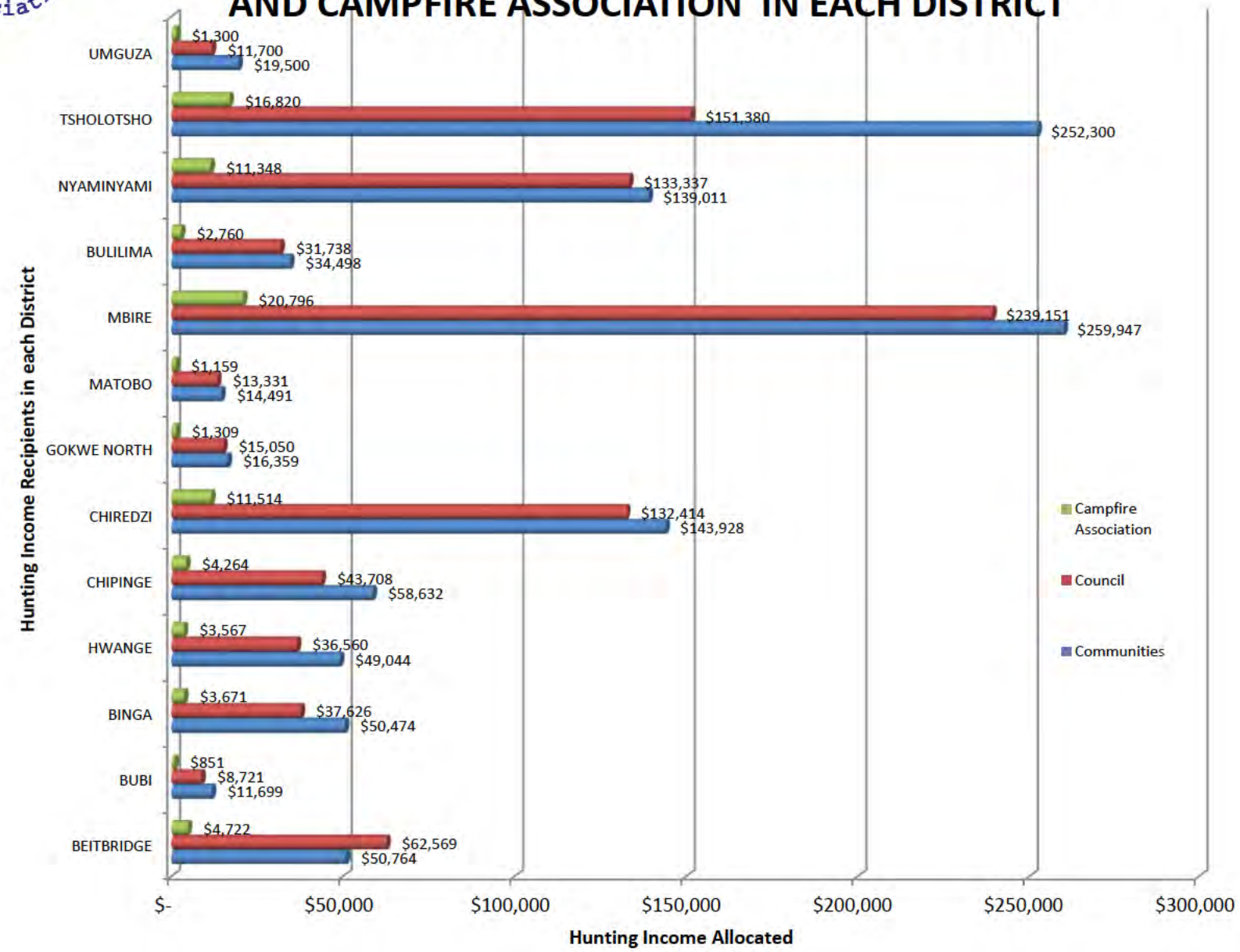
Hurungwe (Chewore/Mukwichi , Charara, Nyaodza Safari Areas) 100%

Mbire (Dande Safari Area) 100%.

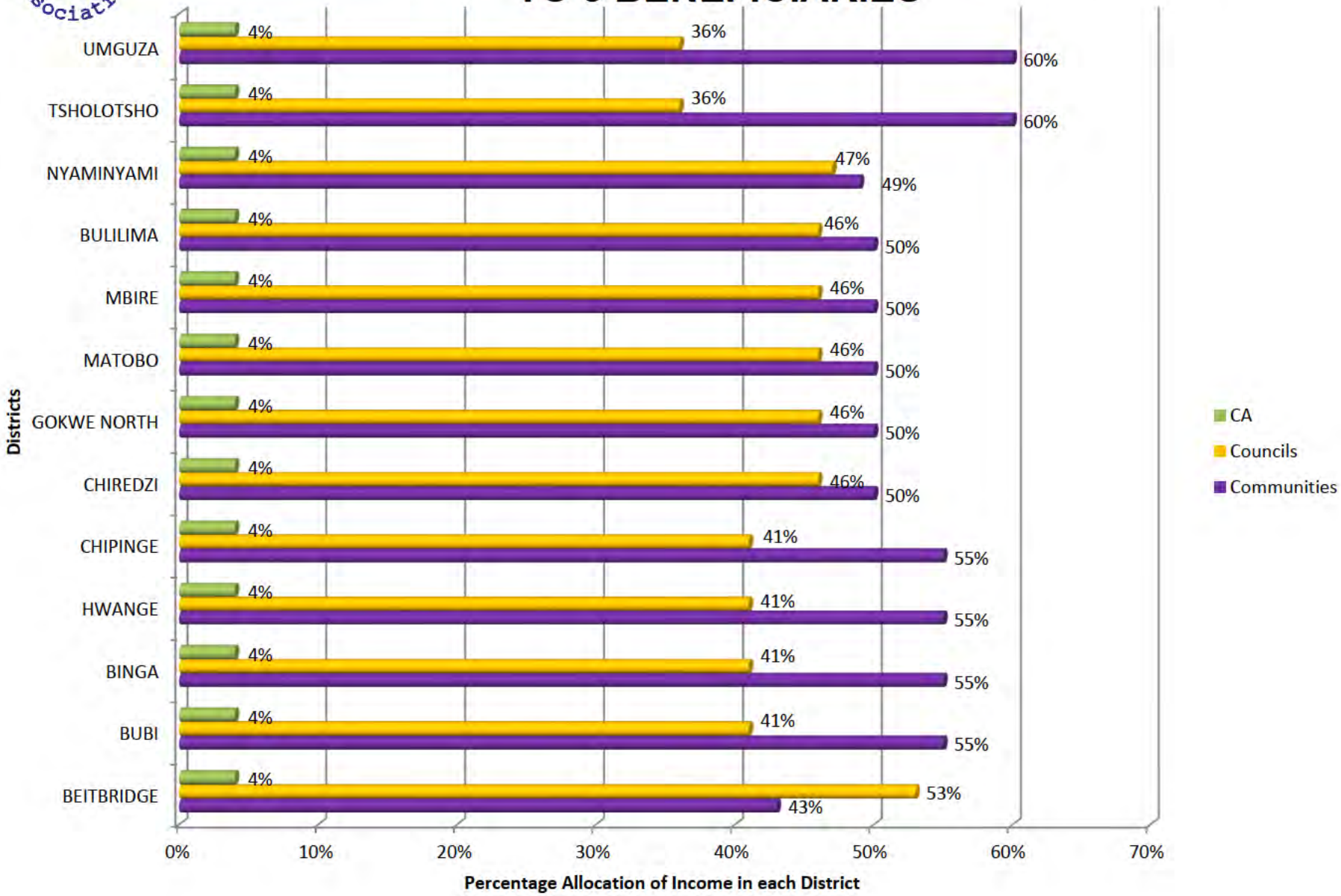
Hunting Income for Elephant Hunting Districts: 2014



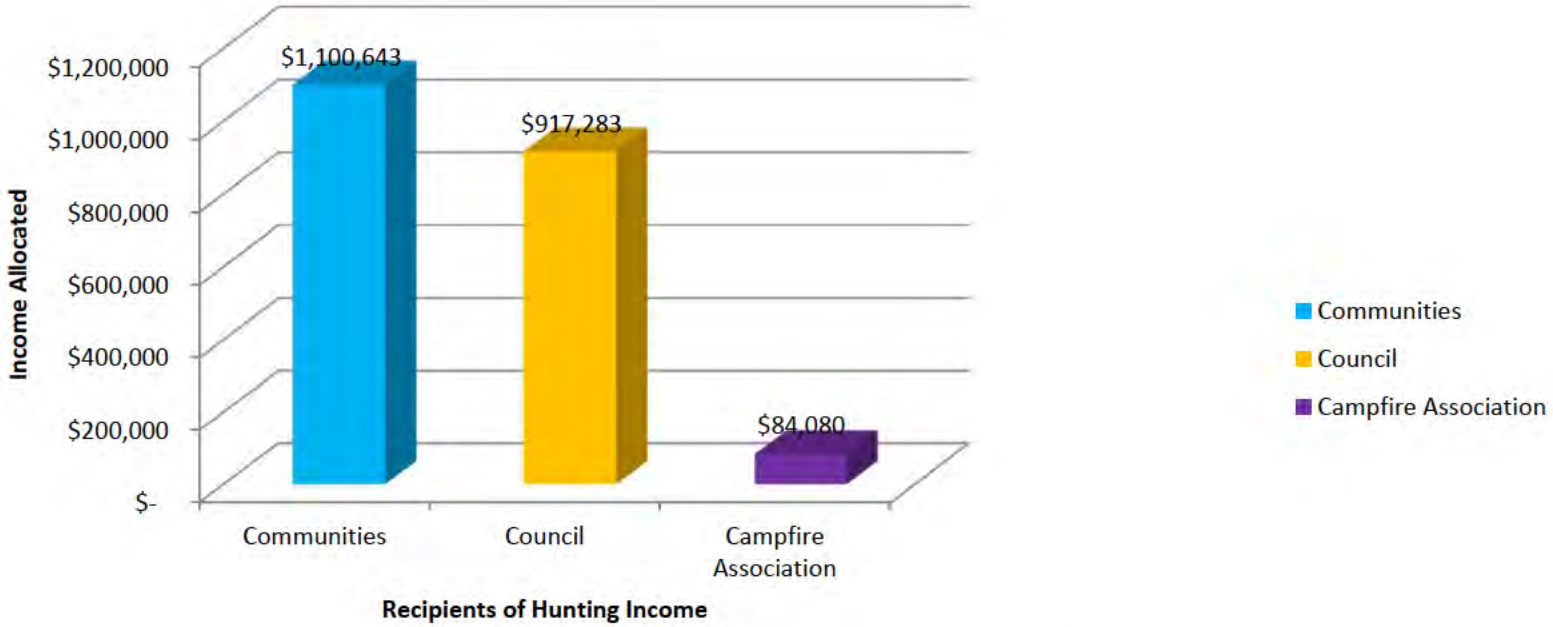
HUNTING INCOME ALLOCATION TO COMMUNITIES, COUNCILS AND CAMPFIRE ASSOCIATION IN EACH DISTRICT



PERCENTAGE HUNTING ALLOCATIONS IN 13 DISTRICTS TO 3 BENEFICIARIES



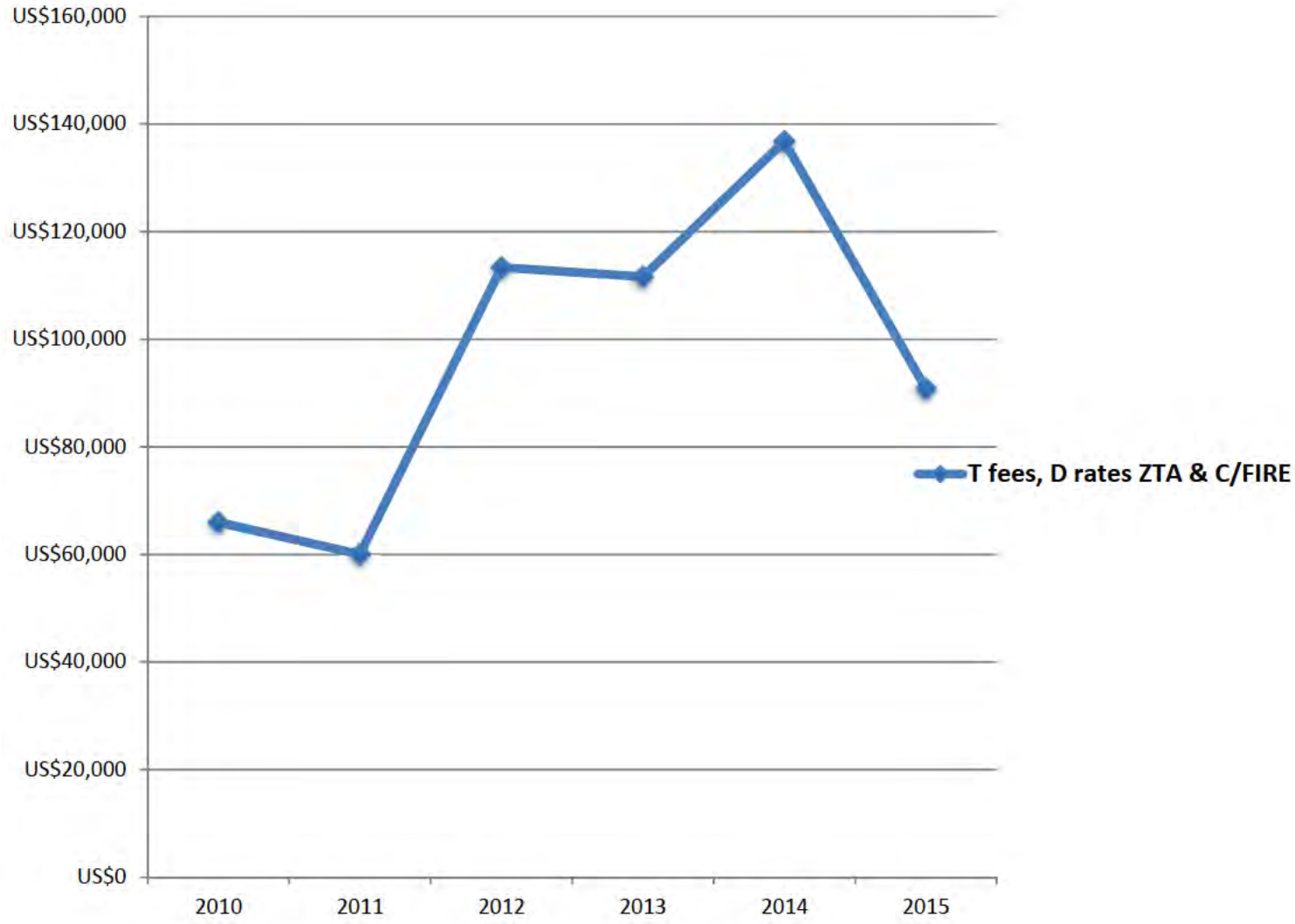
TOTAL INCOME ALLOCATIONS TO COMMUNITIES, COUNCILS & ASSOCIATION FROM 13 DISTRICTS



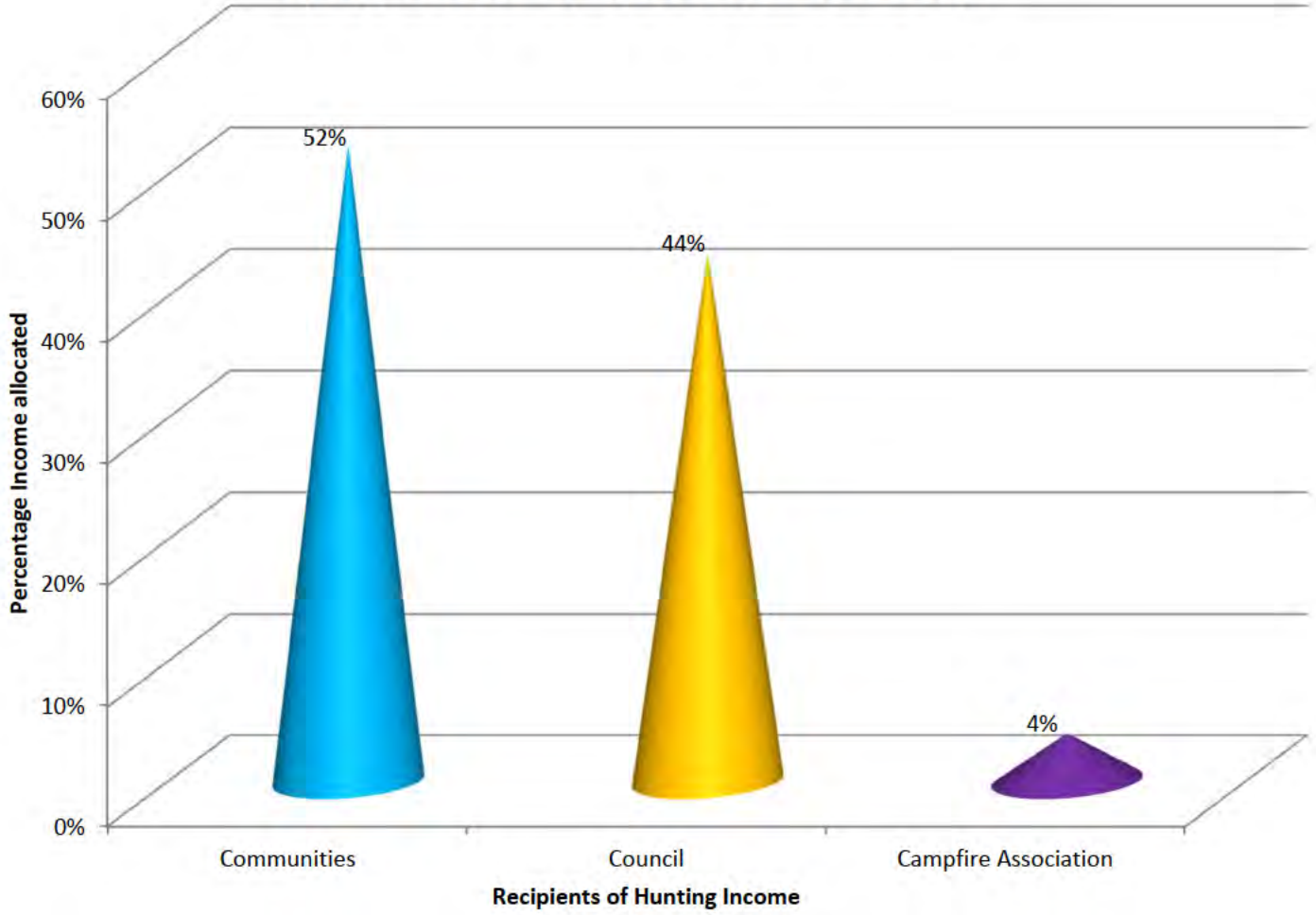
Total income for 2014 was $2,102,007, compared to $2,229,910.00 in 2013. Elephant hunting contributed 54% ($1,138,375.09) of the total hunting income. Only Matobo district did not generate any income from elephant, with Hwange district getting 100% of its income from elephant.

SIX YEAR SAMPLE - MBIRE DISTRICT, WARD 4 GROSS INCOME: 2014

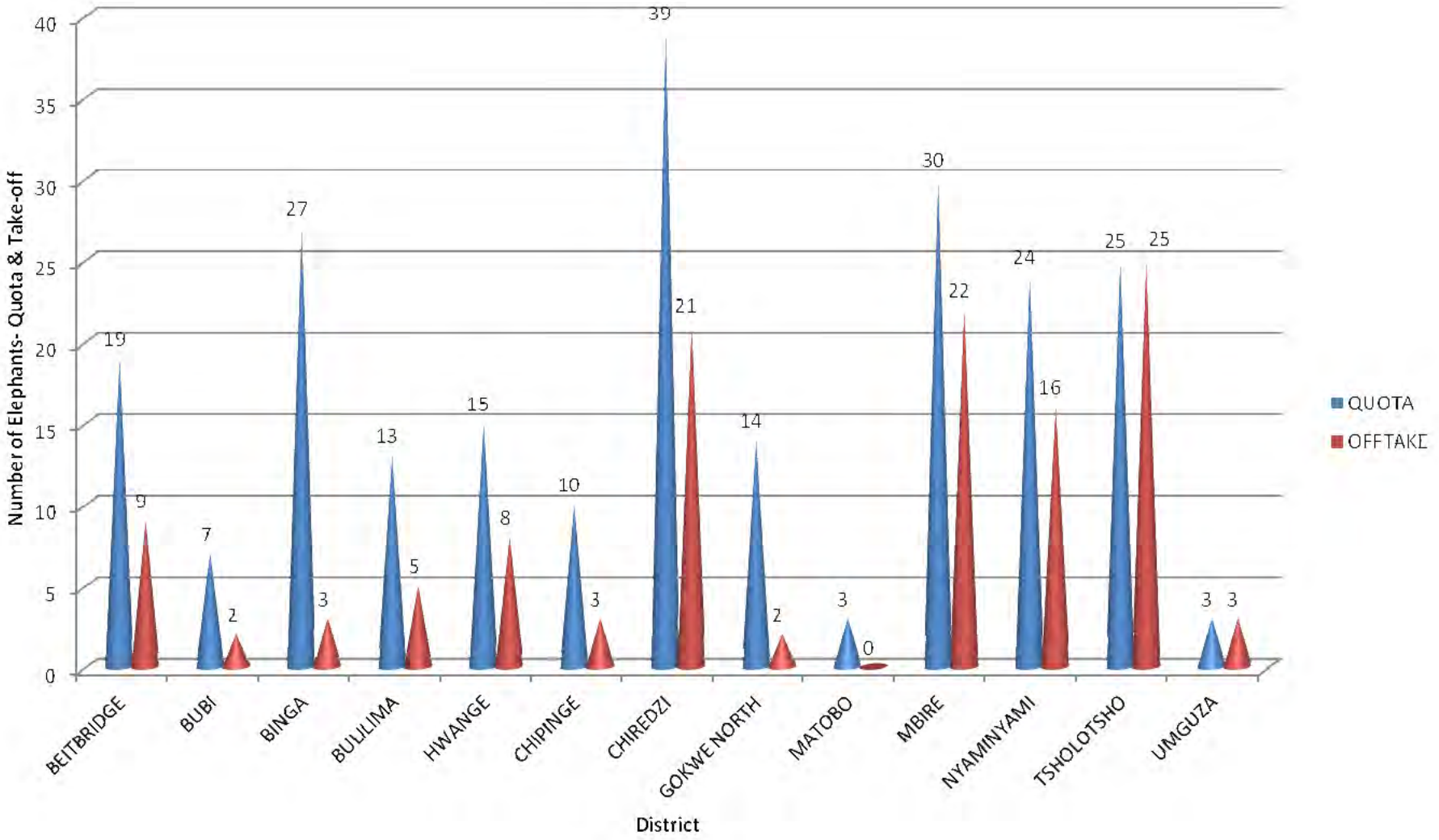
***Note this is primarily an elephant area , showing a 38% reduction in revenue ***



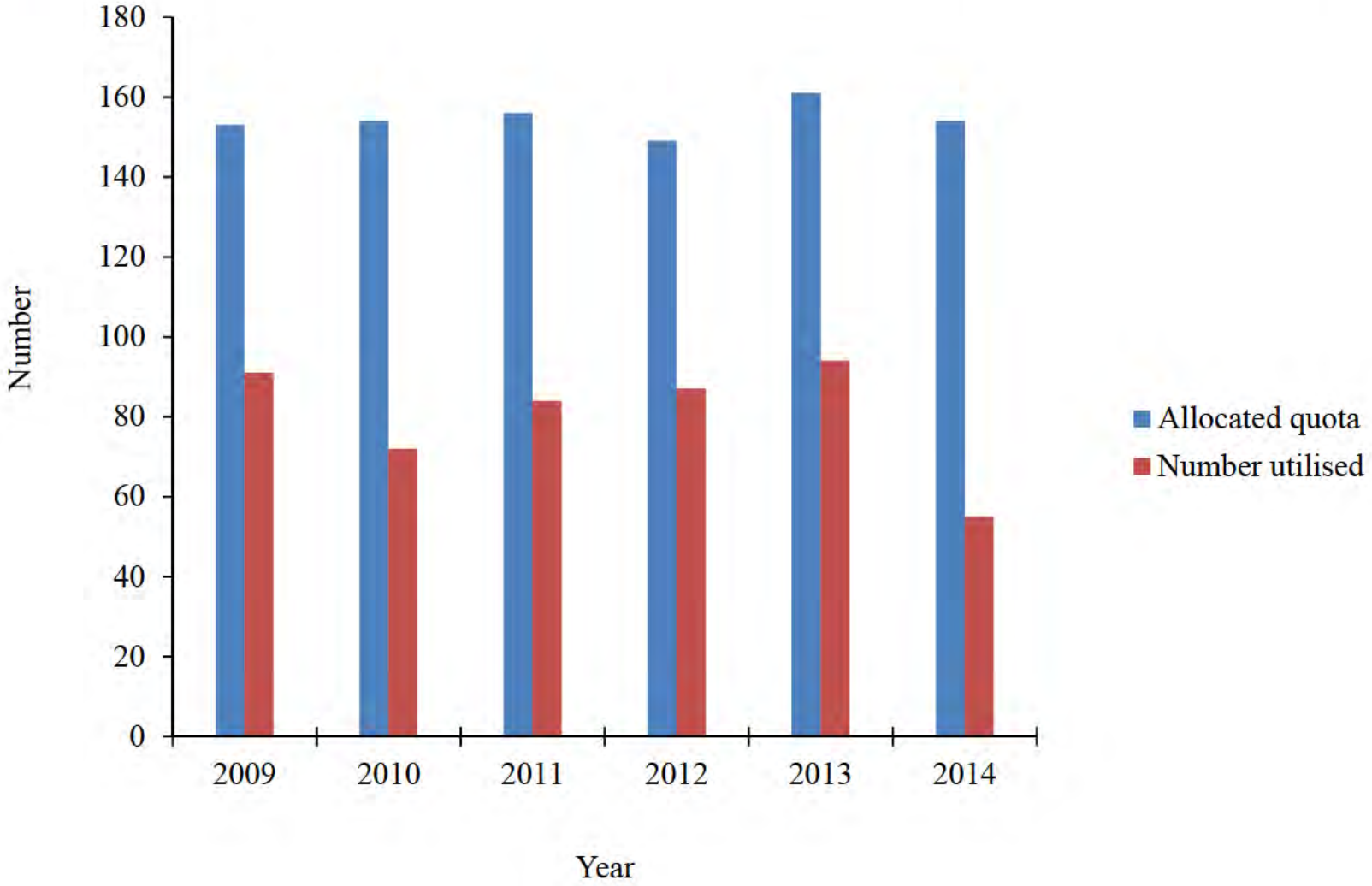
PERCENTAGE ALLOCATIONS OF INCOME TO 3 RECIPIENTS OF HUNTING INCOME



NUMERICAL ELEPHANT QUOTAS AND OFF-TAKE PER DISTRICT

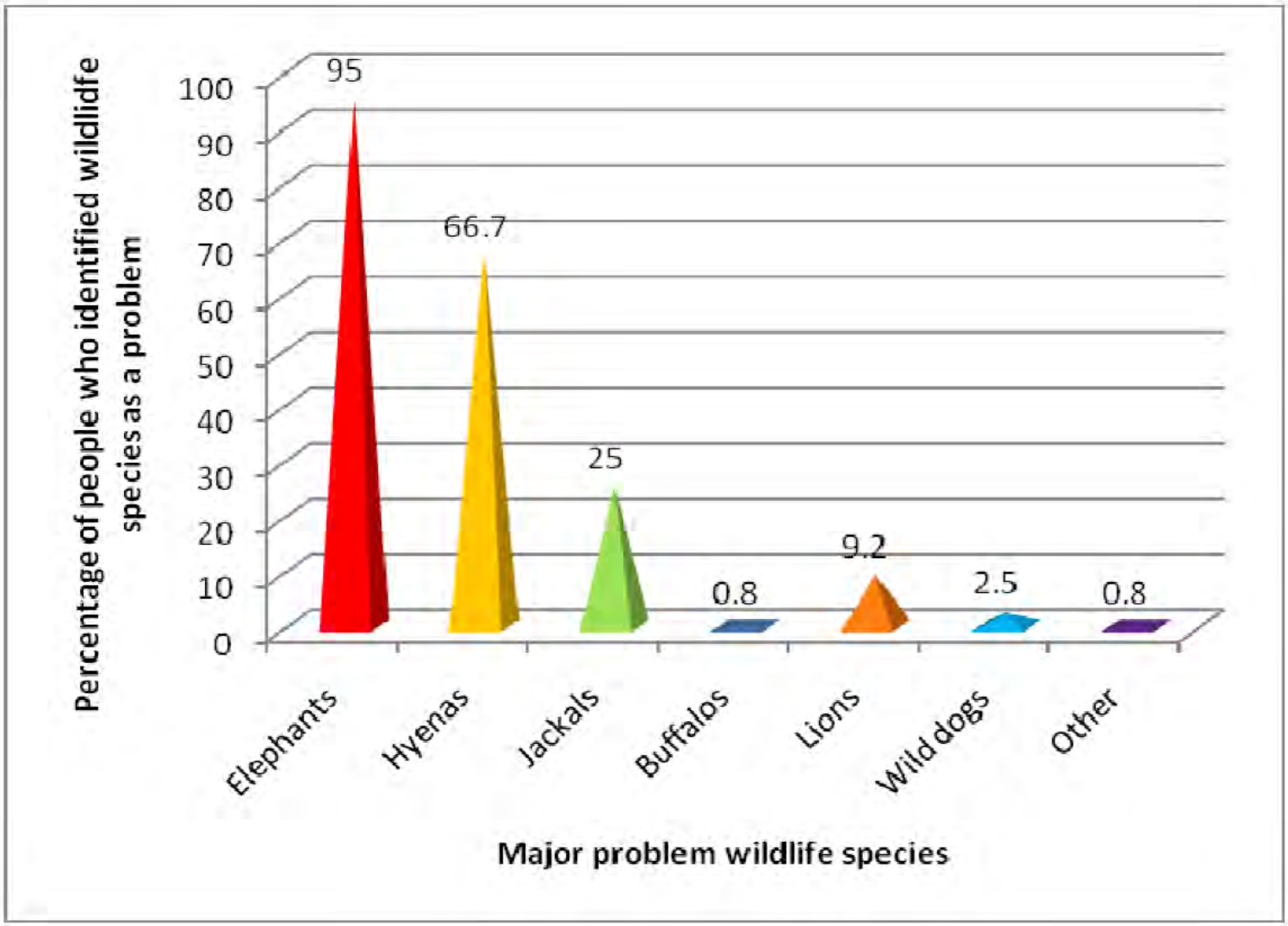


COMBINED QUOTAS AND UTILIZATION: 2009-2014



Data from 10 districts (Beitbridge, Binga, Bubi, Gokwe North, Hurungwe, Hwange, Matobo, Mbire, Mudzi, Tsholotsho)

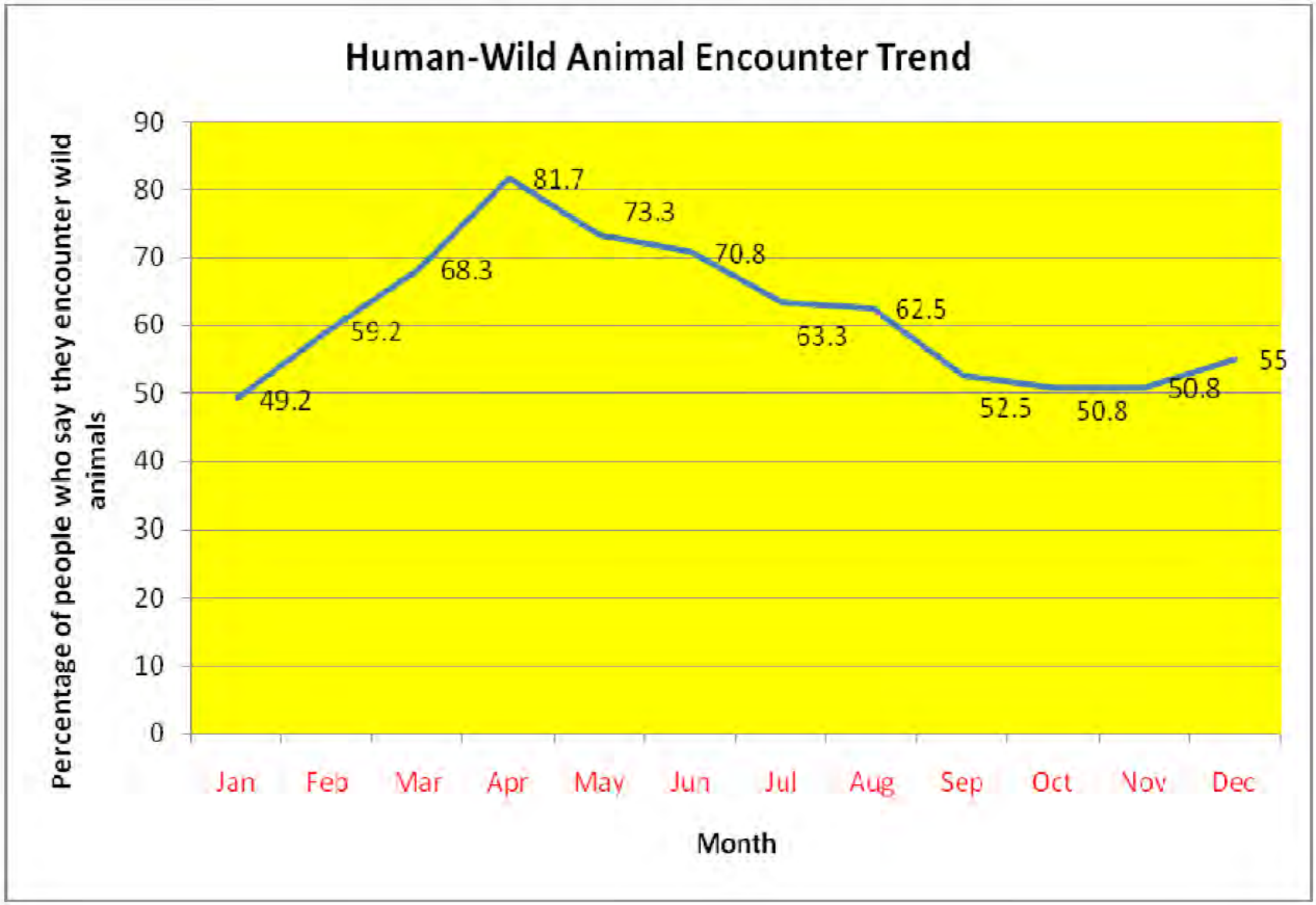
MAJOR PROBLEM ANIMAL SPECIES IN TSHOLOTSHO: 2014



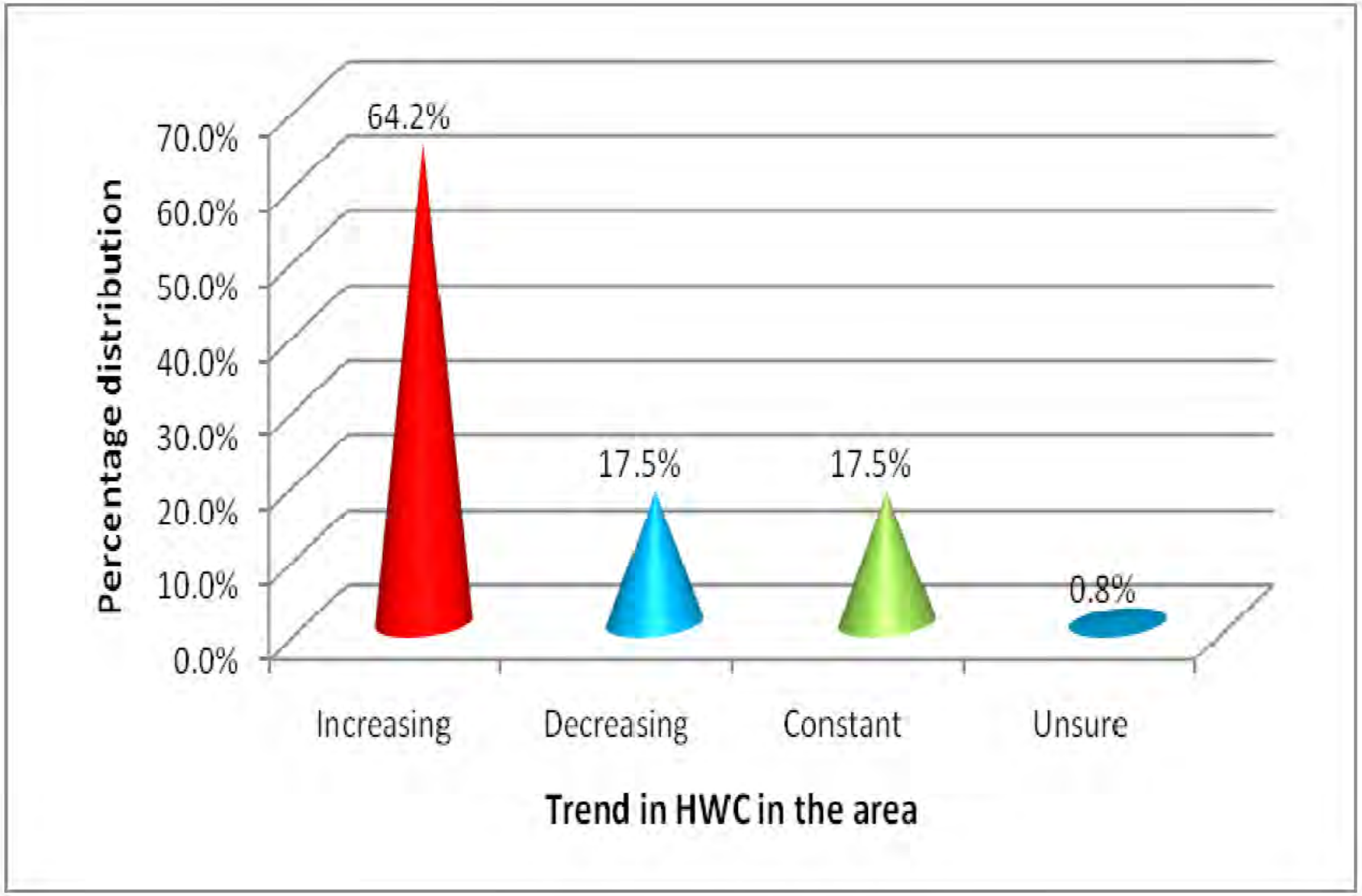
PROBLEMS CAUSED BY SPECIES

Problem	Related animal (expressed in percentage)						
	Elephants	Hyenas	Jackals	Buffalo	Lion	Wild dog	Warthog
Crop raiding	97.4%						2.6%
Contaminate water sources	95.6%			4.5%			
Human injuries & deaths	100%						
Passing on of diseases & pests to domestic animals				100%			
Livestock attacks & losses		56.8%	34.1%		6.8%	2.3%	
Damage to property	100%						

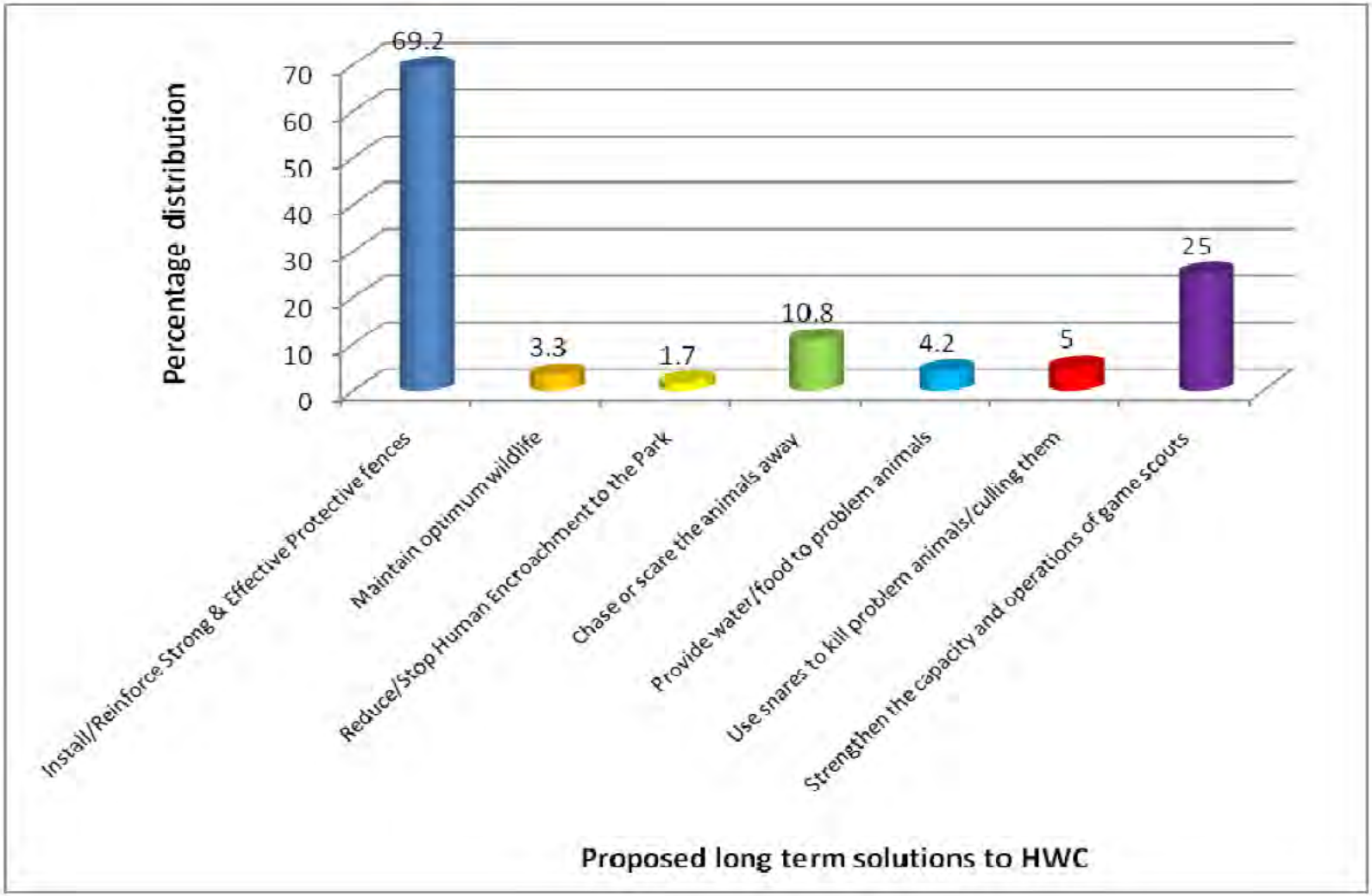
HUMAN WILD ANIMAL ENCOUNTERS



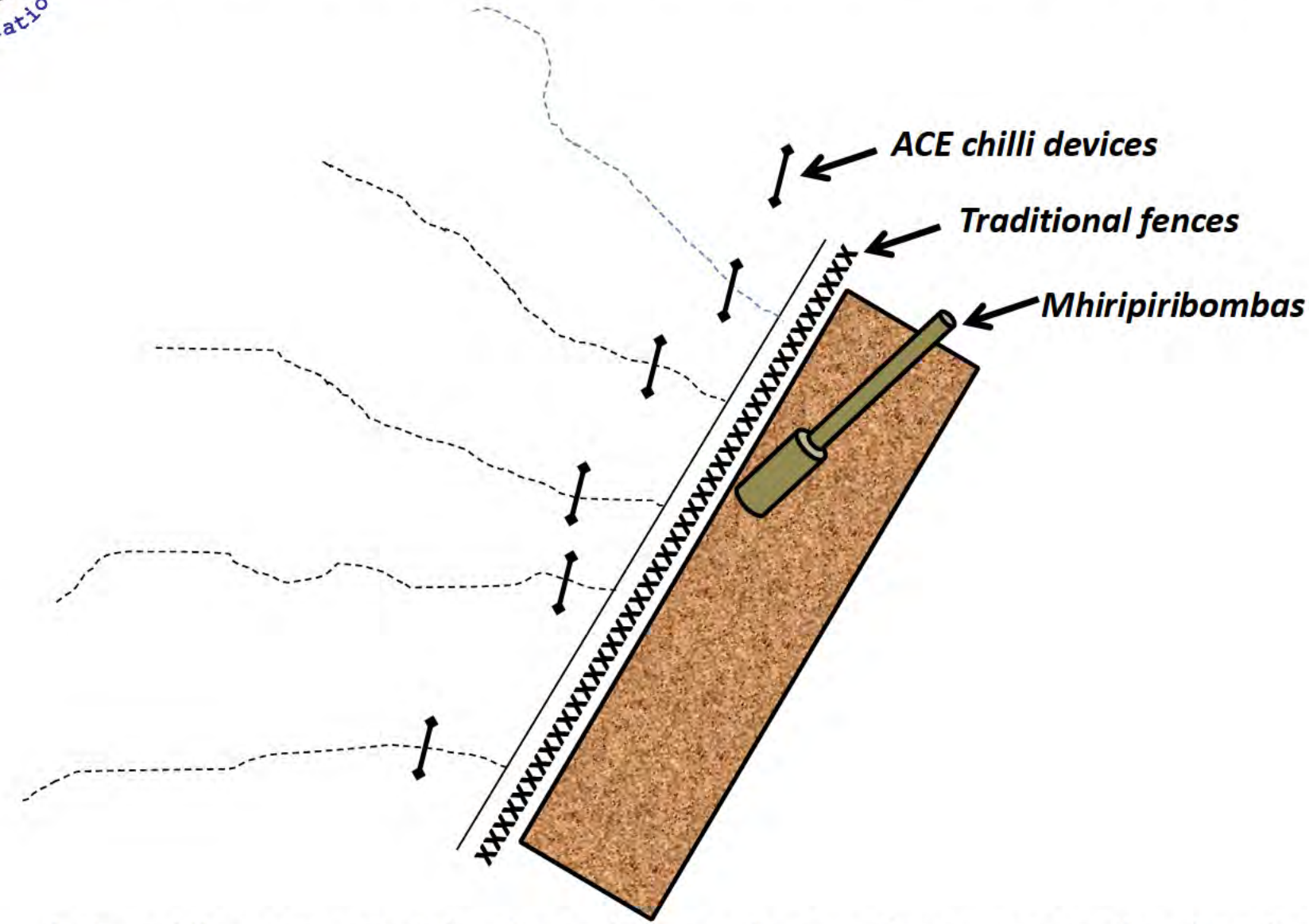
TRENDS IN HWC



PROPOSED LONG TERM SOLUTIONS

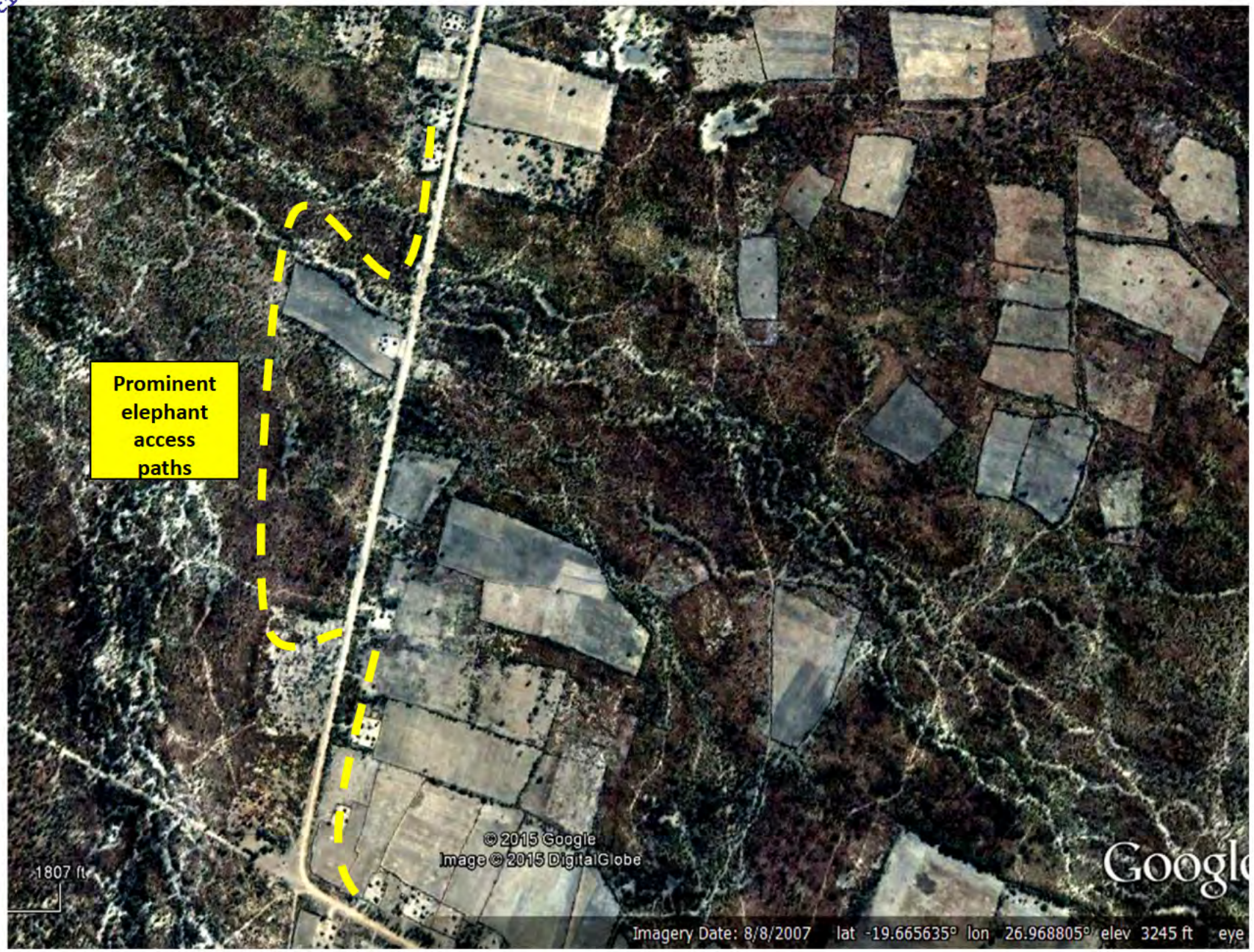


PILOT HWC MITIGATION SCHEME WARD 7 TSHOLOTSHO



A two kilometre stretch of road was chosen from across the bend near borehole 27 towards Pelendaba for the protocol.

PILOT HWC MITIGATION SCHEME WARD 7 TSHOLOTSHO



CONCLUSION

Summary of the impacts of the African Elephant importation ban on CAMPFIRE:

(a) Negatively affected the voluntary participation of communities in wildlife conservation;

(b) Elephant populations capable of producing sustainable and economically significant revenues are now a bigger cost to communities;

(c) Benefits for local communities have declined:

- The number of elephant harvested has decreased.
- The extent of the present elephant habitat can no longer compete with other alternative land uses, even if less viable in the long term.

(d) The ban has effectively galvanized a global anti-hunting lobby against Zimbabwe.

Elephant damage in Bulilima district, South Western Zimbabwe: 25 October 2015

THANK YOU

14th AFRICAN WILDLIFE CONSULTATIVE FORUM

LAND USE PLANNING AT THE LOCAL LEVEL

Chief Senator D. Chisunga
Masoka Community, Mbire District
Zimbabwe
10 November 2015

Legend Resort, South Africa

Introduction

My presentation is based on land use planning at the local level.

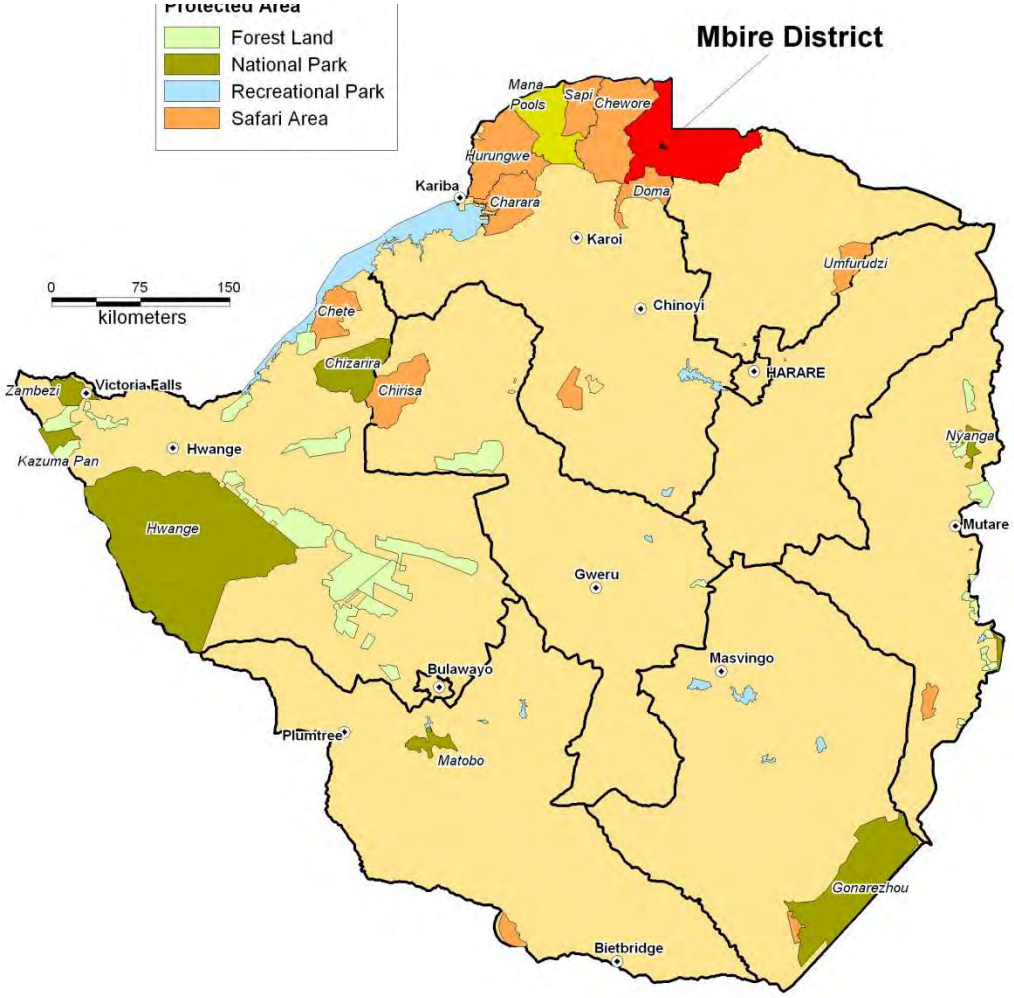
In Zimbabwe there are Acts of Parliament which underpin planning at all levels. Examples are the:
Communal Lands Act;
Regional Town and Country Planning Act;
Traditional leaders Act; and the
Rural District Councils Act

The later is the principal planning instrument at local level in rural areas.

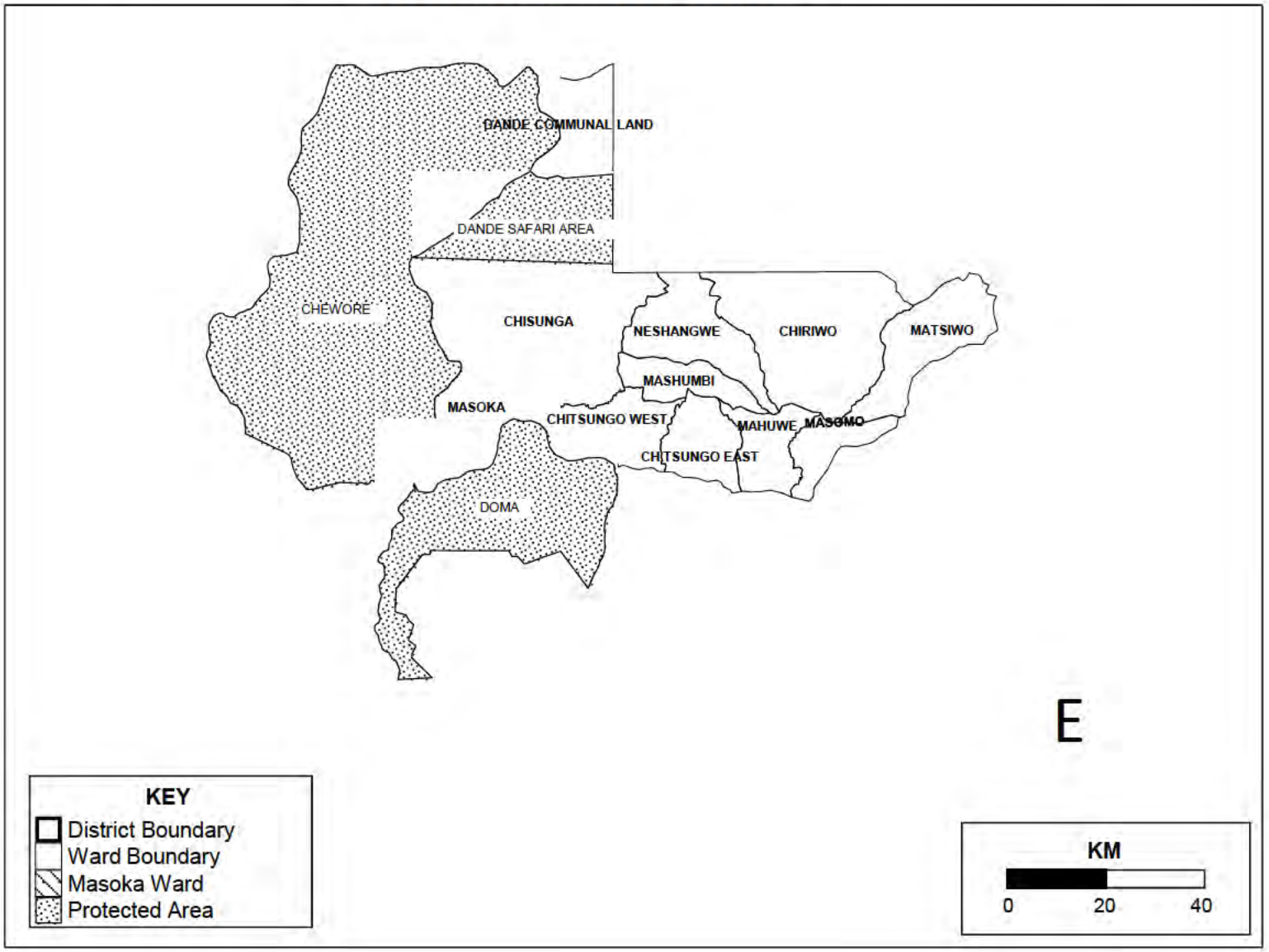
Most communal areas with abundant natural resources fall under Region V ecologically, and receive only about 400-750 mm of rainfall.

The colonial design before independence pushed black people into these areas as the areas were not suitable for commercial agriculture. This forms the basis for animal husbandry, especially wildlife, as a land use option for such communities. I come from such an area which is geographically located in the Zambezi Valley, to the north of Zimbabwe

Map of Zimbabwe



Mbire District and adjacent Chewore, Dande and Doma Safari Areas



Land Use Planning and Wildlife Conservation in Zimbabwe

Most communal area inhabitants are poor and depend on subsistence crop production and livestock rearing. Cropping is largely done in wetter areas.

Livelihoods for communities revolve around production of subsistence food crops and a limited amount of cash crops such as maize, cotton, sorghum and millet.

Wildlife conservation under CAMPFIRE is a rural development strategy that has significantly complimented economic benefits from subsistence farming in the marginal districts of Zimbabwe.

Land Use Planning and Wildlife Conservation in Zimbabwe

After Zimbabwean's independence, there was high demand for communal land for cotton growing, which had then a flourishing market internationally.

High demand of agricultural land in areas with poor rainfall and poor soils resulted in various land use options emerging.

The need to plan how land could be best utilized.

Government formalized wildlife management as a land use option through amendment of the Parks and Wildlife Act (1982) to allow community based natural resource management practices (CAMPFIRE).

An enabling environment was created and institutions were established to support community co-existence with wildlife, and manage wildlife and human conflict. Recognizing many competing livelihood options such as cattle ranching/grazing, gold panning and subsistence agriculture.

Wildlife Management in Mbire District

- Mbire district's Masoka Ward is the first community in Zimbabwe to adapt CAMPFIRE principles as a natural resource management regime for local development.
- The district's communal and adjacent State protected areas support a diverse and extensive population of large mammals.
- Governance of natural resources is done through Ward Wildlife Committees (WWCs).
- Rules and regulations exist, including constitutions.
- Project management by the communities is generally efficient, bank accounts are maintained.
- Involvement of the private sector is currently restricted to two safari operators.

2013 DANDE SAFARI AREA, DANDE NORTH AND DANDE EAST - ACTUAL PAYMENTS BY SAFARI OPERATOR

	Hunting	Social Funds	Bird quota/ Camp rental	Total
Council	US$206,624.0	US$47,000.0	US$3,000.0	US$256,624.0
Parks	US$190,994.0	US$0.0	US$0.0	US$190,994.0
Ward 4	US$27,365.0	US$4,000.0	US$3,500.0	US$34,865.0
Ward 10	US$2,000.0	US$1,000.0	US$0.0	US$3,000.0
Ward 11	US$21,057.0	US$2,000.0	US$0.0	US$23,057.0
Ward 12	US$6,000.0	US$2,500.0	US$0.0	US$8,500.0
Ward 1	US$41,237.5	US$5,500.0	US$0.0	US$46,737.5
Ward 2	US$59,947.5	US$5,500.0	US$0.0	US$65,447.5
CAMPFIRE Association	US$12,608.0	US$0.0	US$0.0	US$12,608.0
ZTA	US$	US$0.0	US$0.0	US$29,799.00
DAPU	US$0.0	US$0.0	US$0.0	US$60,000.0 (estimate)
Total Paid	**US$567,833.0**	**US$67,500.0**	**US$6,500.0**	**US$731,632.00**

2014 DANDE SAFARI AREA, DANDE NORTH AND DANDE EAST - ACTUAL PAYMENTS BY SAFARI OPERATOR

	Hunting	Social Funds	Camp rental/ bird quota	Total	
Council	US$225,172.0	US$47,000.0	US$3,000.0	US$275,172.0	
Parks	US$147,374.0	US$0.0	US$0.0	US$147,374.0	
Ward 4	US$33,520.0	US$4,000.0	US$3,000.0	US$40,520.0	
Ward 10	US$525.0	US$1,000.0	US$0.0	US$1,525.0	
Ward 11	US$26,597.8	US$2,000.0	US$0.0	US$28,597.8	
Ward 12	US$0.0	US$2,500.0	US$0.0	US$2,500.0	
Ward 1	US$49,217.0	US$5,500.0	US$0.0	US$54,717.0	
Ward 2	US$71,352.3	US$5,500.0	US$0.0	US$76,852.3	
CAMPFIRE Association	US$14,650.0	US$0.0	US$0.0	US$14,650.0	
ZTA	US$24,466.00	$0	$0	US$24,466.00	
DAPU	US$0.0	US$0.0	US$0.0	US$71,968.0	(actual)
Total Paid	**US$568,408.1**	**US$67,500.0**	**US$6,000.0**	**US$738,342.00**	

2015 DANDE SAFARI AREA, DANDE NORTH AND DANDE EAST - ACTUAL PAYMENTS BY SAFARI OPERATOR

	Hunting	Social funds	Camp rental/ Bird quota	Total	Notes
Council	$121,693.00	$47,000.00	$3,000.00	$171,693.00	
Parks	$131,768.08	$0	$0	$131,768.08	
Ward 4	$22,261.91	$4,000.00	$3,500	$29,762.00	
Ward 10	$3,862.50	$1,000.00	$0	$4,862.00	
Ward 11	$15,950.05	$2,000.00	$0	$17,950.00	
Ward 12	$0	$2,500.00	$0	$2,500.00	
Ward 1	$35,582.86	$5,500.00	$0	$41,082.00	
Ward 2	$55,794.73	$5,500.00	$0	$61,295.00	
CAMPFIRE Association	$10,515.00	$0	$0	$10,515.00	
ZTA	$18,164.00	$0	$0	$18,164.00	
DAPU	$80,000.00	$0	$0	$80,000	
Total Paid	**$495,591.00**	**$67,500.00**	**$7,500.00**	**$589,592.00**	Add 20,000 for incomplete hunts

EXAMPLES OF COMMUNITY PROJECTS FUNDED FROM WILDLIFE INCOME IN MBIRE

Clinic, nurses houses,
Wildlife administration/CAMPFIRE office, storerooms,
14 classrooms blocks, 7 teachers houses, school office,
Grinding mills,
2 hand pump bore holes, water pipes, toilet, water storage tanks,
2 tractors, a tourist camp with 4 chalets

Mbire Elephant poaching statistics (90% accurate)

Year	No of Carcasses
2010	40
2011	36
2012	16
2013	4
2014	9
2015	3 (as of 14th October 2015)

COLLABORATIVE APPROACH TO ANTI-POACHING IN MBIRE DISTRICT

DANDE ANTI-POACHING UNIT (DAPU)

Prior to 2010 that “community scouts” were thoroughly discouraged as often they went up to a year without any pay - (hyper inflation)

Safari operator (with donor/client help) began support of the community scouts (10 to begin with) in Dande East – payment of half of their salaries, food, and equipment.

DAPU consists of:

1. Two full time “managers” employed.
2. Two dedicated land cruisers allocated.
3. 22 “community scouts” under DAPU control.
4. Access to 18 “Council Scouts”.
5. Access to 18 “Parks Rangers”.

The results are gratifying - poachers are on the back foot, thousands of snares have been picked up, and dozens of poachers arrested.

PLANNING FOR THE FUTURE OF WILDLIFE AND PEOPLE

In order for communities to conserve natural resources, value and benefits have to be attached to the resources.

Due to dwindling space there is need for planning. Communities are consulted through participatory processes which embrace the needs of communities, wildlife, in a changing environment e.g. the establishment of conservancies for both consumptive and won consumptive tourism.

Conservation must produce benefits.

Even our trees are pay for their existence through carbon storage, Carbon credits have been sold and benefitted communities in Mbire.

In Zimbabwe, CAMPFIRE has worked very well for marginalized communities.

There are also opportunity costs associated with conservation - trauma caused by all night guarding of crops or livestock from Elephants and Lions.

People get killed by Lions, Elephants, Hippos, Crocodiles and Buffaloes

The cost of conservation in rural areas is high, hence the need for elephants to pay for their survival.

CONCLUSION

Poor rural communities are at the **frontline** of human and elephant conflict. They **tolerate crop damage and refrain from taking the law into their own hands** simply because currently they enjoy the benefits of hunting.

Communities in producer wards **do not want to see their hunting benefits being depleted by poachers**. HOWEVER, if there are no rewards from legal hunting they will in turn actively assist or actually poach those same elephants for reward.

A Parks led patrol accompanied by DAPU with arrested poachers

THANK YOU

United States Department of the Interior

FISH AND WILDLIFE SERVICE
Washington, D.C. 20240

In Reply Refer To:
FWS/AIA/OMA

JUL - 2 1997

Memorandum

To: The File

From: Chief, Branch of Permits

Subject: Enhancement Finding for African Elephants Taken as Sport-hunted Trophies in Zimbabwe.

The African Elephant (Loxodonta africana) is listed as threatened under the U.S. Endangered Species Act with a special rule at 50 CFR 17.40(e). The special rule sets forth requirements for the import of sport-hunted trophies, including marking requirements for ivory. Under paragraph 17.40(e)(3)(iii)(C),the Service must make a finding that the killing of the elephant whose trophy is intended for import would enhance the survival of the species.

Based on available information, the OMA believes that Zimbabwe is effectively conserving and managing the elephant population throughout the country and finds that the import of sport-hunted elephant trophies from Zimbabwe enhances the survival of the species. This finding applies to all African elephant trophies lawfully taken in Zimbabwe, provided they are imported by the person who hunted them for personal use.

Basis for Enhancement Finding:

Population Status: Aerial surveys of elephant populations have been undertaken by the Department of National Parks & Wild Life Management (DNPWLM) since 1980 using standard sample count techniques. As a result, Zimbabwe has one of the best sets of elephant population data in Africa. There were no surveys conducted in 1996 presumably due to the loss of DNPWLM's survey craft. There were previous concerns raised about the accuracy of these surveys due to the possibility of double-counting of elephants that may move between Zimbabwe and adjoining countries, and differing population estimates. These concerns were addressed by conducting simultaneous surveys of the Matebeleland north elephant population in Zimbabwe, and those in the north of Botswana and the Caprivi Strip in Namibia. These surveys were conducted under the coordination of the European Union funded ELESMAP project. In addition, an independent survey was conducted by Price Waterhouse in 1996 which also confirmed Zimbabwe's elephant population estimates.

Zimbabwe's elephant population was estimated at approximately 46,000 elephants in 1980. The current estimates from 1995 indicate the population in Zimbabwe stands at approximately 66,000 animals. This represents a population growth of about 5% per annum. This increase has not been consistent across all sub-populations. There has been no significant increase seen in the Gonarezhou and Sebungwe populations. These elephant populations have been affected by increased human populations and by drought. There were also high levels of poaching and management offtake which took place in these areas in the late 1980's.

Management Plan: In Zimbabwe, the elephants range can be classified into four major sub-regions. They are the Matebeleland north-west, Zambezi Valley, Sebungwe and Gonarezhou. There is concern that high elephant concentrations are having a great impact on Savanna ecosystems within Zimbabwe. In 1975, Zimbabwe passed the Parks and Wild Life Act which established National Parks to preserve and protect wildlife and plants and to maintain ecological stability. Until 1989, DNPWLM managed elephant densities in protected areas through culling operations. This practice was drastically reduced due to lack of funds and possibly due to public opinion. In 1992/1993, Zimbabwe experienced a mayor elephant die-off in the Gonarezhou region due to severe drought conditions. A major culling operation was resumed in this area where 350 elephants were culled. In addition, DNPWLM conducted a translocation operation where 1,400 elephants were translocated to private conservancies and about 200 were translocated to South Africa to stock a new Game Park. Despite these efforts to reduce the Gonarezhou population, 1,500 elephants died due to natural mortality.

The increase in Zimbabwe's human population has resulted in an increase in human-elephant conflicts. Zimbabwe is dealing with this problem through a program of conservation based community development referred to as CAMPFIRE.

Management Program: Under the Parks and Wild Life Act, as amended August 1, 1991, elephants are afforded the highest level of legal protection in National Parks where the killing of elephants is undertaken only as a management tool to protect habitat. Other range areas available to the elephant include Safari areas, Communal and Private land where sustainable recreational hunting is permitted. The sale and purchase of live animals or trophies in these areas is subject to a permit, and hunting on state land also requires a permit.

In Communal lands, the protection of elephants falls under the CAMPFIRE program which encourages reductions in human-elephant conflicts through conservation-based community development. The program was established in 1989 as a means of providing an economic incentive and return to rural communities while encouraging tolerance for the elephant and sustainable use of natural resources. Under this program there are currently 29 Rural District Councils (RDC's) which have been granted Appropriate Authority status under the Parks and Wild Life Act. There are approximately 13 RDC's with exploitable wildlife resources which make up the core of the CAMPFIRE program. Revenue generated through sport-hunting is spent according to decisions taken by RDC's and their constituent Communities. The DNPWLM provides guidelines for the distribution of these funds between administrative costs, cost of wildlife management, and returns to communities in wildlife areas.

The CAMPFIRE program has come under criticism relating to excessive retention of generated funds by district councils which resulted in diminished benefits being realized by the communities it was designed to help. Information supplied by the CAMPFIRE Association to the CITES Panel of Experts indicates that this situation is improving. The Association presented evidence on revenue distribution for five districts from 1991 to 1995. In the Chipenge and Hurungwe RDC's, revenue retained by the council maintained a level of 20 % or less. In Binga it was reduced from 50% to 20%, and in Gokwe North revenue retention went from 80% to 53%. In Bulilimamangwe it remained at 50%.

Regulations/Enforcement: Under the Parks and Wild Life Act, Zimbabwe has regulations in place which provide substantial penalties for the unlawful possession of, or trading in ivory. The first offense carries a minimum of 5 years, maximum 15 year prison term. The second offense carries a minimum of 7 years, maximum 15 year prison term.

In 1993, "Operation Safeguard Heritage" was launched by the President of Zimbabwe which incorporated large numbers of army personnel along with Air Force support, the Zimbabwe Republic Police (ZRP), and DNPWLM in a coordinated anti-poaching effort throughout the country. The overall anti-poaching manpower densities in protected areas stands at one game scout per 76 sq. km. The Investigations branch of the DNPWLM currently has 9 officers and 7 game scouts based in Harare, Bulawayo, Mutare, Kariba, Hwange, and Beitbridge. The ZRP has a support unit of 112 men which assist anti-poaching programs in the districts of Makuti, Mashumbi Pools, Binga, and Hwange. Elephants located in communal lands come under the protection of the CAMPFIRE program.

The DNPWLM operational budget allocation from the central government has been severely reduced in recent years. The current law enforcement expenditure is equivalent to $49.00 spent per sq. km on the elephant range, greatly reducing enforcement capabilities. The status of DNPWLM changed in January 1996, when the Government of Zimbabwe approved the establishment of the Parks and Wild Life Conservation Fund, a statutory "Fund" responsible for financing operations directly from wildlife revenues. These revenues are generated through sport-hunting conducted on state and private lands. The CITES Panel of Experts raised concerns as to the current status of DNPWLM relating to its weak financial base, lack of management skills, inadequate and old equipment and poor infrastructure. The DNPWLM informed the Panel that this situation is improving, although it was not made clear how these improvements are being accomplished.

Sustainable Use: The CITES Secretariat has provided documentation that Zimbabwe has established a quota of 400 elephants (800 tusks) for the 1997 hunting season. These quotas are established each year by DNPWLM based upon standardized aerial surveys and analysis of biological data collected from hunts in determining the sustainability of offtake. This quota represents 0.6 per cent of the elephant population of Zimbabwe.

Total levels of current and projected offtake from the Zimbabwe elephant population are sustainable. From 1989 to 1995, problem animal control (PAC) resulted in 20 to 69 elephants being taken annually due to human-elephant conflicts. The number of elephants killed under PAC is deducted from the hunting quota for a given area. The DNPWLM has introduced

localized culling or "disturbance culling" in areas experiencing high elephant problem reports. No large scale elephant culls have been undertaken since 1989, although this remains a management option in removing the annual increment. The illegal hunting of elephants has decline in recent years with a high of 99 elephants being taken in 1990 compared to a low of 38 elephants taken in 1995. This decrease has occurred despite the drop in DNPWLM funding and manpower.

The principle form of utilization of the elephant in Zimbabwe is sport-hunting. In the 1995 hunting season, a quota of 300 elephants was approved, of which 121 were taken. These quotas are set to maximize the sustainable production of high quality trophies without detriment to the population. Under the Campfire program, rural communities benefit from revenue generated by sport-hunting. With increased human-elephant conflicts on Communal lands, sport-hunting is an important tool which gives these communities a stake in sustainable management of the elephant as a natural and economic resource.

CITES Implementation: The Control of Goods (Import and Export) (Wildlife) Regulations of 1982, and the Parks and Wild Life Act of 1975 as amended on August 1, 1990, allow for the implementation of the provisions of CITES in Zimbabwe. All exports of sport-hunted trophies from Zimbabwe will conform with CITES regulations.

Stephanie Coulter

From: John J. Jackson, III [jjw-no2@att.net]
Sent: Monday, April 21, 2014 12:06 PM
To: Regina Lennox; Stephanie Coulter
Subject: Fwd: Fwd: Re: Elephant Poisoning

Follow Up Flag: Follow up
Flag Status: Flagged

-------- Original Message --------
Subject: Fwd: Re: Elephant Poisoning
Date: Fri, 11 Apr 2014 12:31:48 -0500
From: John J. Jackson, III <cf@conservationforce.org>
To: Tim Vannorman <Tim_Vannorman@fws.gov>

Tim, FYI.

--
John J. Jackson, III
CONSERVATION FORCE
3240 S. I-10 Service Road W., Suite 200
Metairie, Louisiana 70001
Tel: (504) 837-1233
Fax: (504) 837-1145
jjw-no@att.net
www.conservationforce.org

-------- Original Message --------
Subject: Re: Elephant Poisoning
Date: Wed, 9 Apr 2014 14:06:40 +0200
From: Thys De Vries <lde@netconnect.co.zw>
To: John J. Jackson, III <jjw-no2@att.net>

Hi John,
Thank you for your e-mail and all you are doing for the hunting fraternity on this and in the past.
You are correct that we are the front line savior for the Elephant and poaching deterrent.

I do not have much proof in statements, but do the Helicopter invoices, Helicopter fuel purchases and a bunch of photos of the operations.

In a nut shell, I won the area in a tender in April of last year, but as you know I have been hunting in Tsholotsho since 1996, but under the operator that owned it. So I was pretty much just an PH bringing in my clients.
When we got control of the area in June, I immediately started anti-poaching operations and have a 20 man strong anti-poaching team in place.
We immediately started recovering snares in the area and found areas where poachers had there camps etc for meat poaching.
Anyway, we had a Russian client with us and we were hunting in several areas

for Elephant and Leopard and the only way we could get around in the minimum time was to have a Helicopter to ferry us back and forth to all the different areas we where conducting the Safari. The client tok 2 x Leopards and 8 x Elephants.

On one of our flights to one of our areas we flew partially over the Hwnage Nat. Park and I spotted a group of dead Elephant. I immediately instructed the pilot to turn back and go lower to have a look, and sure enough we saw +/- 5 carcasses with their tusks removed.
As soon as we landed at the other area we were hunting I telephoned Merilyn to advise the Nat. Parks offices of what we had spotted. As they had no clue, transport I got the Helicopter to fly back and pick up 3 scouts and go back and land and check what was happening. Which they did, I was not with as I was on the safari with the Russian client, and we discovered that they where definitely poached, but there was no bullet holes in the carcasses. With further investigations they found other dead animals, so we realized it is poison and found the area they had laced with Cyanide.

I sent a 2 x vehicles from my Tsholotsho base to get Nat Parks scouts to patrol the area, while I was finishing off the hunt with my Russian client. While I was still on the hunt, my anti-poaching scouts found fresh tracks of 4 people moving through our concession towards the Hwange Nat Park boundary. They immediately sprung into action and followed the tracks. They caught up the suspected poachers where they were seated in thick bush and cooking some food. Two of my scouts kreeped up to the suspected poachers to see what and how they can be apprehended. My senior scout realized that there was something different with these poachers as they had no wire snares, guns. But had 2 x axes, about 10 5 liter plastic containers and two 20 liter containers which looked liked they had water in them. Further they saw a whit plastic bag placed away from where they were seated.
He made the decision to pull back and radioed back to our camp base to advise and asked a vehicle to go and fetch the Nat. Parks Scouts that where on the ground patrolling about 30 km's to the north of my anti-poaching teams current position.

In the mean time the suspected poachers gathered there belongings and started on there route. My anti-poaching team followed them at a distance until they reached the Hwange Nat Park boundary with our hunting concession, Tsholotsho South.

An hour so later the Nat Parks scouts arrived at the crossing place and they took up the spoor. They followed the spoor all afternoon, slept on the spoor and kept on following the tracks the next day.
On the way they started seeing the carnage. New spots where water containers were placed and filled with water and laced with Cyanide.

They followed the tracks back to our boundary line with Hwange Nat. Park and kept on the tracks till they got to the houses where the suspected poachers where staying.
That evening / night when the unsuspected poachers where relaxed they moved in and arrested them. With a bit of interrogation they revealed where the tusks where buried and led the scouts to the plave where they recovered many tusks.
I received word that evening and immediately made plans to get the Helicopter into the air the next day to look at the full scale of the poaching problem. Luckily we were at the end of the clients hunt and he left the very day, so I could use the Helicopter for the reconnaissance. As the helicopter was a big Helicopter and cost where huge we got in smaller Helicopter a few days later to help with alll the flights.

With a bit more interrogation we got the buyers names and contact numbers and set up a sting to get the poachers and the buyers to meet. With in hours

we had also arrested the buyers as well.

That is in a nut shell of what happened.
As I wrote in a previous e-mail. All costs of this operations, future operations and still today we are funding.

I am getting all the figure together, but just the Helicopter fuel is close to USD 8 000.

If you have any questions or want to know more, let me know.
I will send some photos so long.

Thank you and Best Regards
Thys

-----Original Message-----
From: John J. Jackson, III
Sent: Monday, April 07, 2014 7:26 PM
To: Thys De Vries
Subject: Elephant Poisoning

Thys,

I need your info about your role in the discovery and response to the poisoning to show that hunting is the first line of defense. Please rush. Tell your hunters I will help them if they get caught in the middle.

Best,
John

--
John J. Jackson, III
CONSERVATION FORCE
3240 S. I-10 Service Road W., Suite 200
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Opping Investments Pvt Ltd T/A

Charlton McCallum Safaris

in association with Global Marketing Consultants LLC

Tel: +263 4 499536 HOP 0259. Email: hunting@cmsafaris.com . Website: www.cmsafaris.com

9th April 2014

Dear Sir

Myself and my partner of CharltonMcCallum Safaris, being Myles McCallum and the community of the Dande communal land and Safari area, are writing this letter to you to highlight the terribly negative impact of your decision to suspend importation of elephant for 2014 with immediate effect it will have on, not only all the people living in the area, but also the elephant themselves that you seek to protect.

Our company was the first hunting company in Zimbabwe to go in a joint venture project with the communities living within the area itself, as we felt that the people were not getting their fair dues from hunting and that they should play an active role in the sustainable off take of wild animals living within their area. The primary animal that benefits them is elephant.

We hunt 15 elephant bulls in our Dande area. These are sold on 14 days at us$1100/day and trophy fees of us$15000 per elephant. This amounts to a total of $231,000. Then a further us$225,000 for the trophy fees making a grand total of us$456,000. . From this amount the communities earn 50% of this, being US$228,000. The communities themselves fund numerous projects from this income including clinics, schools, water wells etc which will be directly affected by your decision to suspend elephant trophies.

Our company uses the monies generated from the elephant hunting to operate a very successful anti-poaching unit, The Dande Anti-Poaching Unit- DAPU. Please look at the link below to understand how effective and costly this project is http://cmsafaris.com/african-elephant-research/dande-anti-poaching.htm

DAPU survives through funding from ourselves and the generous donations from our Elephant hunters who, when on the ground realise that without DAPU involvement we would be losing many elephant to poaching. For your information we started DAPU 4 years ago when we counted 40 elephant carcasses found from the previous off season. This last year we have found only one- a clear sign that we are having a great effect on conserving our elephant numbers.

I can honestly say that with a possible 14 elephant cancellations that we are now looking at for the 2014 season due to your decision we will not be able to continue the sterling work that DAPU has managed over the last 4 years and without a doubt we will reverse all the gains that we have seen and we will be back to finding dozens of elephant carcasses.

So in short, Sir, the ban will have a very negative impact on not only the people of the Dande but the very elephant you wish to protect. Should the ban not be reversed we will start to see wide spread elephant poaching again. It will also affect some 20 000 people that rely on monies and work generated through elephant hunt. I hope that you will reconsider your suspension.

Regards James Charlton

SPECIAL SUPPLEMENT

"Hunting provides the principal incentive and revenue for conservation. Hence it is a force for conservation."

World Conservation Force Bulletin

April 2014

Illegal Wildlife Trade and Poaching

DATELINE:
United States

John J. Jackson III

There are a host of reactions in both the United States and the European Union to the reported upsurge in poaching and illegal trade of wildlife. President Obama's Executive Order creating both an *Illegal Wildlife Trafficking Task Force* and an *Advisory Council* conspicuously left out membership of the hunting community, but not the animal rights and protectionist groups. Consequently, many of the suggestions have been aimed at lawful, regulated trade rather than poaching and unlawful trade. Of course, licensed, regulated hunting and trade generates budget revenue for anti-poaching and crucial anti-poaching incentives for local people. Hunting operators also directly and indirectly reduce and help control poaching. In fact, the regulated hunting community is the foremost anti-poaching force in the world as hunting leadership has been for thousands of years. From the very inception, wildlife management has included anti-poaching ("Ancient Asian societies" – Raul Valdez, *Exploring Our Ancient Roots*). We are the real experts.

Conservation Force itself has funded many millions of dollars of poaching control in pass-through donations. Conservation Force's activities have tripled anti-poaching funding in Pakistan, doubled rhino anti-poaching revenue in Namibia, and routinely generates 200 to 500 thousand dollars a year in anti-poaching through partnerships with hunting operators across Africa. For example, we facilitate over $100,000 annually through the Cullman & Hurt Foundation in Tanzania as well as up to $300,000 for the Tanganyika Wildlife Foundation in Tanzania. It is well documented that the presence of hunting operators itself deters poaching and provides alerts to authorities. The absence of operators is like leaving your house open and empty – it is an invitation for thieves to move in.

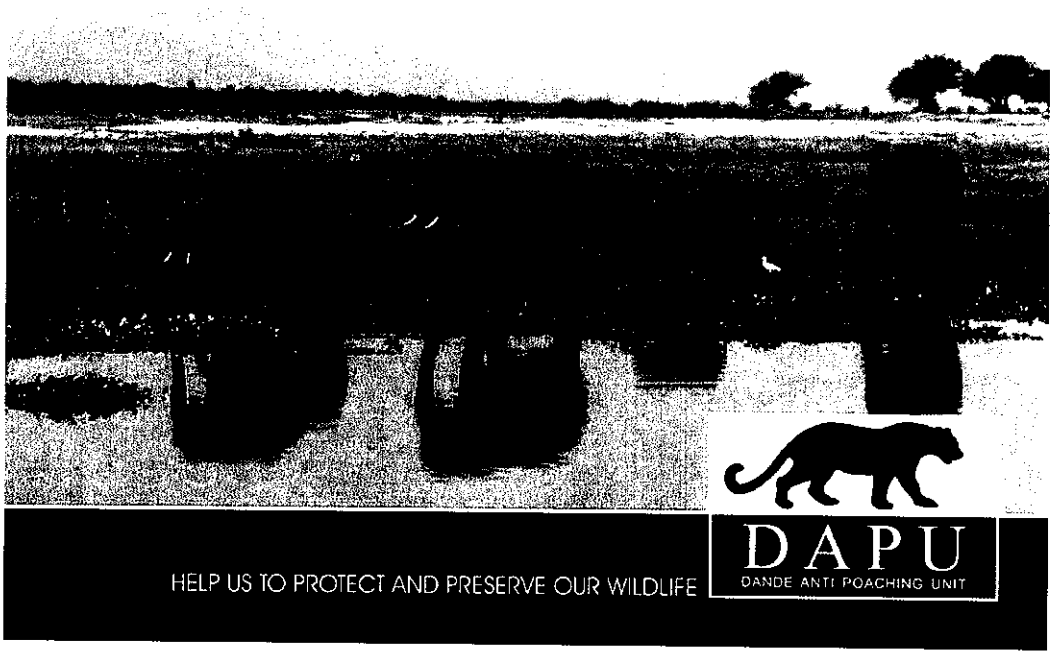
Conservation Force's partner, CIC, will hold a Global Summit entitled *Hunters United Against Wildlife Crime* at the beginning of its AGM in Milan, Italy on April 24, 2014.

The Professional Hunters Association of South Africa, PHASA, has begun collecting $500 from all rhino hunting and rhino darting safaris for rhino anti-poaching as contributions to and through Conservation Force in a new rhino anti-poaching strategy.

Conservation Force is also forming an anti-poaching partnership with all the Republic of South Africa and Mozambique hunting operators surrounding Kruger National Park to contain the rhino poaching in and around the park. It will be a ring or circle of added protection.

Of course, the funds from the recent black rhino auction at Dallas Safari Club's convention resting in Conservation Force's trust account are dedicated to control of poaching and closely related conservation measures in Namibia.

We hope to showcase these growing anti-poaching partnerships in these pages in the future. One exemplary project is the Dande Anti-Poaching Unit we have just partnered with in Zimbabwe. View the following brochure and their website at http://cmsafaris.com/african-elephant-research/dande-anti-poaching.htm. ■



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SPECIAL SUPPLEMENT

World Conservation Force Bulletin

EDITOR/WRITER John J. Jackson, III

PUBLISHER Barbara Crown

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Conservation Force Solves Liberia Trophy Import Problems

In October 2012, US Fish & Wildlife Service (USFWS) Law Enforcement began detaining trophies imported from newly opened Liberia. They detained some and formally seized others. In effect, it became a blockade. Conservation Force has done all that it could for the past 16 months to determine the reason for the seizures, to prevent the forfeitures during the interim, and to clear the apparent USFWS blockade of all trophies being imported from Liberia. Case-by-case, the logjam of problems was finally cleared in the first few months of 2014.

The problems have been identified and all but one hunter's trophies have been released. The first and worst problem was that USFWS Law Enforcement thought the hunting was illegal because it had been closed and the CITES trophy export permits had a number of errors and omissions. This was made worse by the refusal of Law Enforcement to even respond to inquiries about why trophies were being detained and/or seized. Under the provisions of the *Service Manual* the inspector is supposed to provide

a detailed narrative when a trophy is detained and a second detailed narrative in the *Notice of Proposed Seizure and Forfeiture.* USFWS Service Manual, Part 443 (Law Enforcement), Chapter 1 (Wildlife Inspection Policy and Procedures) 1.15, 1.16, 1.17 and 50 CFR 14.53, Detention and refusal of clearance, 12.11 and 12.23 – all require a narrative explaining "why" the detention or seizure and also mandate certain deadlines for providing "why" the import is refused. That was not provided in any of the cases, and the seizing agent would not respond to phone messages and emails. This was made worse by a change in both the Regional Solicitor and the Resident Agent in Charge of Law Enforcement. The whole thing was handled very poorly by the Service. Because there was no descriptive narrative of the factual basis of the alleged general violations of law, the errors in the export permitting could not be identified or corrected. Liberia issued amended export permits that were not accepted because there was no USFWS narrative explanation of why the export permits were considered invalid, if that was the problem at all.

The permitting problems were omissions that were rather simple to correct had they been identified. They arose only because the Liberian CITES authorities had no experience with export of hunting trophies. The Law Enforcement tone, speculation and accusations that hunting was not open and that the authorities were acting fraudulently only made resolution more difficult.

Conservation Force was concerned that the trophy blockade would discourage the experimental opening of hunting in Liberia, thus we did everything we could to identify and solve the problems. All (legal) representation has been a free, public service to the US hunters and Liberia because of the importance to the hunting and conservation community. Had we not intervened, most of the trophies would have been forfeited. But for the petitions for remission that Conservation Force filed, there would be no explanation of the detentions and seizures (though a year late) so that Liberia and the hunting community could take corrective measures. The trophies that were detained indefinitely without proper notice or explanation would no doubt have been seized and forfeited as well.

The caveat to hunters and their brokers is that **export permits from newly opened countries must be examined space-by-space for completeness and errors.** CITES export permitting requires experience. Of course, USFWS Law Enforcement performance did not help. ■

Elephant Hair and Skin Bracelets Importable

In March, USFWS issued import permits for bracelets made of the sole of elephant feet/skin of a sport hunted elephant taken in Tanzania (Appendix I of CITES). This is an important breakthrough for hunters taking elephant in Tanzania or any other country where elephant remain on Appendix I, such as Zambia, when and if Zambia reopens.

It should be understood that the Division of Management Authority (DMA) issued a CITES import permit. The DMA did not say an import permit was not necessary. Instead, DMA required a separate import application and fee than that for the ivory and other unworked parts being imported as hunting trophies. The bracelets are not treated as trophies because they are "worked" or "crafted," so USFWS requires separate import permit applications.

USFWS has published a proposed regulation to treat such crafted parts as trophies, but it has not been finalized. We were concerned that crafted parts of an Appendix I species would not be permitted since applications for import of scrimshawed/crafted elephant tusks have been denied in the past, though we don't know how such an application would be treated today.

It should be pointed out that elephant bracelets from Republic of South Africa, Namibia, Botswana and Zimbabwe, where elephant are on Appendix II, also require an import permit for the "worked" bracelet, even though an import permit is not appropriate for the unworked parts that are considered "trophy" parts. The downlisting of those elephant to Appendix II is only as trophies, which USFWS maintains excludes crafted parts. If the part is not a "trophy" because it has been crafted, then that part remains on Appendix I, thus an import permit is necessary just like in Tanzania and Zambia where even trophies are on Appendix I (not downlisted with an annotation).

We presume that bracelets of elephant hair will be treated the same as those approved skin bracelets from the soles of elephant feet. The same is true of elephant feet and bones made into useful or decorative items. ■

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April 14, 2014

Director, USF&W Department

Please allow me to introduce myself. My partner Andrew Dawson and myself are the directors and owners of Chifuti Safaris, based in the Chewore North Safari Area in the country of Zimbabwe. Our firm is among the largest of it's kind in Zimbabwe, and our lower Zambezi area is one of Africa's true elephant strongholds, as well as home for countless other game. We are one of Zimbabwe Parks Departments largest cash customers, and have enjoyed a long and successful relationship with this department.

In theory, Zimbabwe Parks is assigned the duty to protect wildlife. In fact it is a department this is underpaid, sometimes under trained, and woefully short of the necessary tools (vehicles, petrol, spare parts and often motivation) to conduct their important duties as provided by the government. Here is where the hunting outfitter comes into play. To ensure vital anti poaching programs are carried out 365 days a year, the vast majority of outfitters, out of our own pockets, train, equip, and offer financial incentive to the Parks personal in our areas. In many instances, hunting clients (98% of which are US citizens) donate to our efforts as they see the results of effective anti poaching efforts in our area.
Sirs, Africa has a proven record as it pertains to wildlife: IF IT PAY"S--IT STAYS! Without regulated sport hunting, and the value it places on wildlife, the game is doomed as has been proven in once great countries such as Kenya. Elephant hunting, and the dollars it generates for our company is vital to our ability to operate. The recent, and ill advised ban on import of sport hunted elephant into the US threatens the very efforts you state as the purpose " to protect wildlife". In reality, it is a death blow to the very people and boots on the ground folks who are the one's truly on the front line of anti poaching efforts. And thus your actions loom as THE LARGEST THREAT to the elephant population in Zimbabwe.

The cancellations of booked hunters threatens anti poaching and conservation efforts in place by the Professional Hunting fraternity across the country, and we appeal to you, on behalf of the wildlife we love and are striving to protect, to lift this destructive and unwarranted import ban before permanent damage is inflicted on our national elephant herd. Safari outfitters, and the revenue flowing in from our legal elephant safaris is the life blood of this species, and our front line efforts will no longer exist if this ban stays in place.

We strongly request you to re-consider your position on the ban, take immediate steps to lift it, and begin an effort to work WITH the Zimbabwe Parks Department and Safari Outfitters like Chifuti in our efforts to protect our wildlife, and specifically elephant, through our proven Conservation Through Hunting model.

Respectfully Submitted

Paul Smith,
Director, Chifuti Safaris
Harare, Zimbabwe

KENYA'S WILDLIFE DEBACLE:

The True Cost of Banning Hunting

BY H. CHARLES KAY

A

too routinely attacked by wild animals. No American parent would tolerate what goes on in Africa.

That being the case, it is not surprising then that wildlife has simply disappeared, legal or not. So poaching has actually increased even in national parks. You have to remember that black indigenous landowners were forcefully removed at gunpoint, and without compensation, from every national park and game preserve in east and southern Africa to create "wilderness" pleasuring grounds for white elites. There are few black tourists in any African national park. So the local people "poach" to feed themselves and to earn a few dollars for their families. So would I and so would you, under similar circumstances.

Recently most of the remaining lions in Nairobi National Park, (Nairobi being the capitol of Kenya), were speared to death within sight of the Kenya Wildlife Service's national headquarters, while some 500 bureaucrats sat paralyzed at their desks. "Only a state monopoly could hope to attain such breathtaking heights of incompetence and ineptitude and hope to get away with it." All of which can be traced to the fact that white colonial governments planted the flag and claimed all land and wildlife for king and country, thereby depriving local people of their birthright. What is even more surprising is that black governments have done little to correct this injustice. Instead, policies like banning all consumptive use of wildlife have made the situation worse.

After being forced at gunpoint from every national park and game preserve in east and southern Africa, the locals are now forced to poach to feed themselves and to earn a few dollars for their families.

There is more to this than I can relate here and if you would like additional details, Google Mike Norton-Griffiths and you should be able to find the website on which he has posted a number of his research articles. Dr.

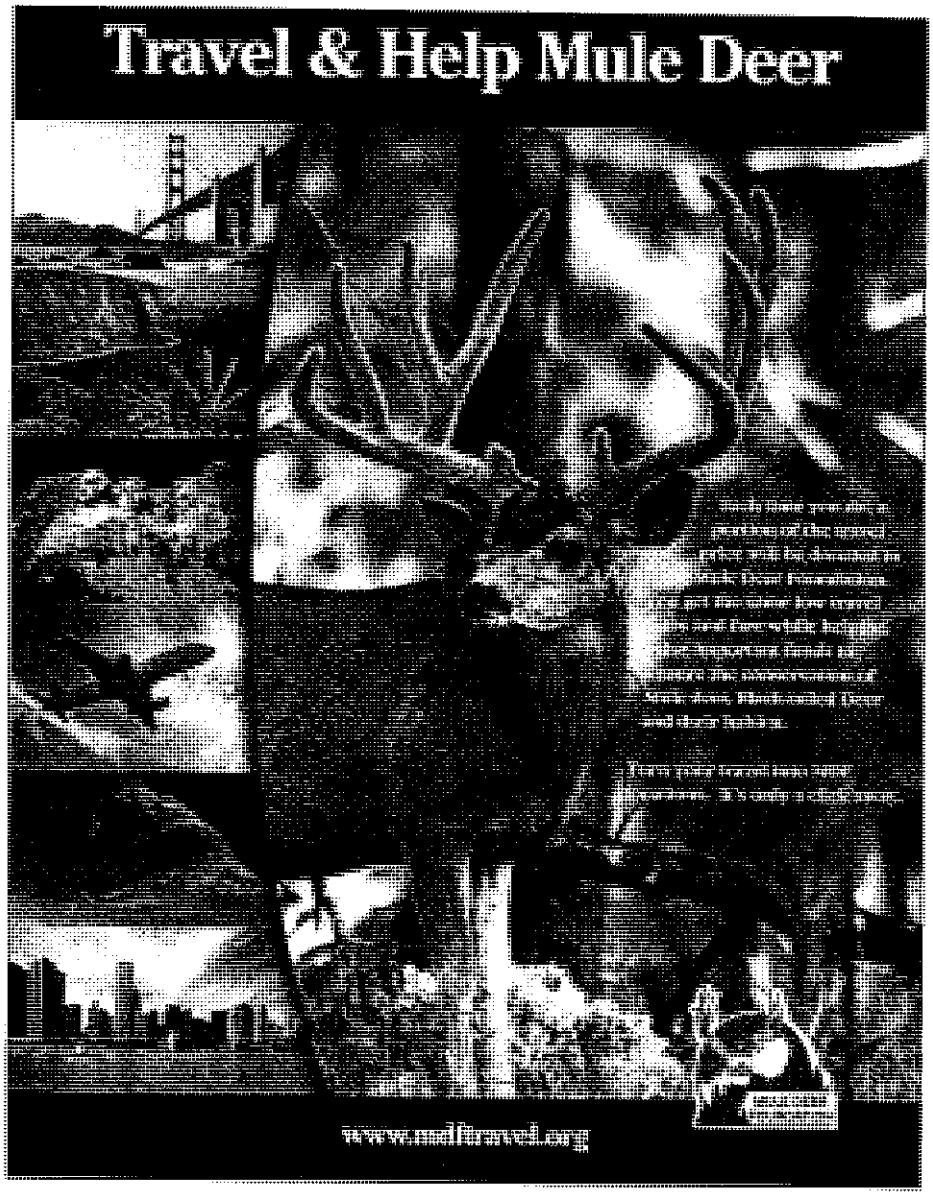
Unlike the problems facing Kenya's wildlife, hunters in the US have always been working for a better solution. Seen here is Wyoming guide, Jim Freeburn (second from right) and his crew. They are all smiles as they show what can come from proper wildlife management and from working hand in hand with private landowners.

Norton-Griffiths is an economist who was born in the U.S., educated in Britain, and who has lived in Kenya for many years. In 2007, Dr. Norton-Griffiths published a paper in World Economics [Vol. 8(2): 41-64] titled, "How Many Wildebeest Do You Need?" that chronicles this sad story. "All [the animals rights organizations] care about is that hunting and other consumptive utilization of wildlife is not reintroduced to Kenya, and whether this leads to further losses of wildlife and to the perpetuation of rural poverty is completely irrelevant to them, because their underlying purpose is not to help Kenya but [to enrich themselves through fundraising]."

At the same time that wildlife numbers have fallen precipitously in Kenya following the prohibition on hunting, wildlife populations in Namibia have doubled. While in South Africa, wildlife habitat has doubled and then doubled again. Why the difference? Because both Namibia and South Africa passed legislation giving landowners rights to wildlife. That is to say, the landowners own the wildlife, at the least the large game species. In South Africa, with which I am most familiar, the ranchers have to high-fence their properties before the government will relinquish ownership of game species, and there are other regulations, as well. But there are no closed seasons, no state licenses, no bag limits, and no prohibited methods. Shooting under the midnight sun is legal; i.e., spotlighting. There are also sanctioned markets in both game meat and live animals. The end of wildlife you say? Nothing could be further from the truth.

As the post-apartheid government has withdrawn subsidies from white cattlemen, the landowners have turned to game ranching and both wildlife populations and sport hunting have experienced phenomenal growth. Now that the government has changed the incentives from wildlife being a cost, to wildlife being an asset, a million acres a year are being converted to wildlife—unlike here in the States, where all you hear about is the loss of wildlife habitat. Private landowners, not the national government, have saved the black wildebeest, blesbok, bontebok, and other species including white and black rhinos, because sport hunting now pays the bills. Aldo Leopold predicted as much back in the 1930's when he wrote an essay on "Game Economics" in which he noted that the surest way to save habitat and enhance wildlife was to allow landowners to profit from protecting habitat and enhancing game populations.

At the present time, plains game hunting in Namibia and South Africa is the most cost efficient big game hunting in the world. Moreover, the trophy quality and hunting experience are outstanding. On my second trip to South Africa, I hunted for three weeks and shot 14 animals, six of which



made Rowland Ward, the international equivalent of Boone and Crockett. The cost? About the same as one high-end, trophy mule deer or elk hunt on a private ranch or Indian Reservation here in the West.

While this has been a blessing for white ranchers, various African governments have also passed laws giving black communal landowners rights to wildlife. In Namibia these are called conservancies and it has been shown that when local people receive a direct financial benefit from wildlife, illegal activity is reduced or even eliminated. It is really quite simple, if sport hunting pays the bills, both wildlife, and more importantly habitat, are not only conserved but enhanced.

In Kenya, animal rights groups claim that wildlife viewing by foreign tourists is more beneficial than sport hunting. In that, though, they are badly mistaken. According to Dr. Norton-Griffiths as "extraordinary as it may seem, not a single tourist company in Kenya invests in wildlife or habitat management even though their very economic future depends upon the resource." This is because most of the large tourist operations are owned by multinational companies, whose only concern is short-term profit. In addition, studies have shown that virtually none of the foreign tourist dollars make it down to the local people, who actually live with wildlife. Instead, black elites divert the money to themselves.

It has been estimated that half the gate receipts from national parks "disappear" before reaching the Kenya treasury. Similarly, there is no accountability of the large financial grants that animal-rights groups make to the government each year, rendering them little more than annual bribes. This is why the black elites that run the country have resisted calls to reinstitute hunting. If hunting was again made legal, animal-rights groups would stop giving funds to the central government and thus, there would be less opportunity for rent-seeking behavior by officials; i.e., graft and corruption.

As documented by various scientific studies, wildlife viewing is also more environmentally destructive than sport hunting. This is because the profit margin per person is less, so you have to run a much greater number of tourists through the system to achieve the economic activity generated by a single sport hunter. In addition, tourists expect paved roads and modern five-star accom-

Instead of wildlife numbers plummeting, areas of Africa outside of Kenya are seeing incredible herd numbers and excellent hunting. Yet, another example of the important role hunting plays in the dynamics of wildlife management.

modations. Water is scarce in arid Africa and tourists require a lot more of it than sport hunters. Furthermore, tourists generate larger quantities of human waste and garbage, both per person and in total, than sport hunters. Sport hunters, on the other hand, are content to stay in tents and drive dirt tracks. No one is arguing that wildlife viewing should not be part of the mix, but to call wildlife viewing "non-consumptive," is simply false. Tourists also have a much larger carbon footprint than safari hunters.

Hunting also has a huge impact in terms of social and economic aspects of certain areas. If not for hunting, many locals would have no source of income and more than likely they would become subject to a poverty stricken state.

Hopefully you will never have to confront animal-rights activists while you are out hunting, but if you do, or if you favor that sort of thing, now at least you are armed with the truth about the wildlife debacle in Kenya. Banning hunting is a surefire way to eliminate wildlife. Although to non-hunters this may seem counterintuitive, it is nevertheless true. The reality is that outlawing the consumptive use of wildlife in Kenya has been an unmitigated ecological and human disaster. While in other African countries that have modified their game laws to encourage sport hunting, wildlife populations have increased, as have the private and communal lands devoted to wildlife. As hard as it may be for some people to accept, the free-market system has been more effective at conserving wildlife in Africa than heavy-handed, state-run monopolies.

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Illegal hunting and law enforcement during a period of economic decline in Zimbabwe: A case study of northern Gonarezhou National Park and adjacent areas

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ABSTRACT

Illegal hunting of wildlife, or top-down harvesting, is a major issue in today's society, particularly in tropical ecosystems. There has been widespread concern about increasing illegal hunting of wildlife in most conservation areas in Zimbabwe following the political instability and economic decline the country faced since 2000. In this study, we focused on the northern Gonarezhou National Park (GNP), a large and unfenced protected area, and adjacent communal areas in southern Zimbabwe. We hypothesised that illegal hunting activities would (1) be perceived to have increased due to economic collapse and (2) vary with law enforcement efforts. A total of 236 local residents from eight villages adjacent to the northern GNP were interviewed using semi-structured questionnaires from December 2010 to May 2011, and law enforcement data for northern GNP between 2000 and 2010 were retrieved from the park law enforcement database. A total of 26 animal species were reportedly hunted. Bushmeat consumption and the need for local trade to raise income were reported as the main reasons behind illegal hunting. Contrary to the first hypothesis, the majority of respondents ($n = 156$, 66%) reported that illegal hunting activities had declined between 2000 and 2010 largely due to increased park protection as also supported by law enforcement data. A total of 22 animal species were recorded as having been illegally hunted in northern GNP. The number of illegal hunters arrested declined with increased law enforcement efforts although the number of wire snares recovered and hunting dogs shot appeared to increase following increased law enforcement efforts. These results partly support the second hypothesis that illegal hunting activities would vary with law enforcement efforts.

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Introduction

In tropical areas, humans are commonly physically inseparable from natural systems due to the heavy dependence of local people on natural resources for their subsistence living (Robinson & Bennett 2004; Singh & Sharma 2009). However, this can lead to unsustainable forms of hunting. Illegal hunting, also known as poaching, is the taking of any kind of wildlife, including fish, in such a way that it violates local, national and international wildlife laws (e.g. Duffy 1999). Illegal hunting is often unsustainable and has led to reductions and/or local extinctions of many wildlife populations across the tropical ecosystems (Bennett et al. 2002; Bennett 2011; Ceballos & Ehrlich 2002; Corlett 2007; Emery 2007; Milner-Gulland et al. 2003; Paudel & Kindlmann 2012; Peres 2000; Wilkie et al. 2011).

Illegal hunting involves the use of traditional hunting methods such as bow and arrows, snares, pitfalls (Kümpel et al. 2008; Noss 1998; Tumusiime et al. 2010), but also the illegal use of firearms, explosives, poisons and more recently small aircraft aided techniques and immobilisation drugs. Illegal hunting is particularly severe where rural people hunt within poorly managed protected areas (Fusari & Carpaneto 2006). Although law enforcement patrols attempt to control illegal hunting activities for bushmeat (meat derived from wild animals), and/or commercial sale within conservation areas (Jachmann 2008a, 2008b; Kaltenborn et al. 2008), the expected financial benefits from such activities are far greater than the costs associated with a low probability of arrest and punitive fines (Bennett 2011; Campbell & Hofer 1995; Loibooki et al. 2002; Moyle 2009). Illegal hunting is also influenced by a poor definition of property rights to wildlife species such as no owner (*res nullius*) status (Bulte & Horan 2002; Child & Chitsike 2000).

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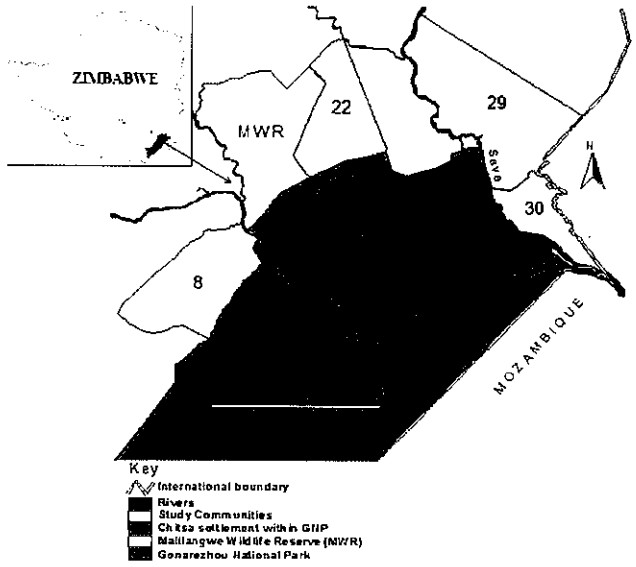

Fig. 1. Location of the four study wards adjacent to the northern Gonarezhou National Park, south-eastern Zimbabwe. *Notes*: 8 – Chibwedziva ward, 22 – Chizvirizvi ward, 29 – Mtandahwe ward and 30 – Mahenye ward.

a combination of subsistence, cash crop farming and livestock production (Gandiwa 2011). These communities manage their natural resources under CAMPFIRE programmes implemented since 1982 in an effort to generate benefits for local communities that otherwise had been deprived by protection policies (Child 1993; Murphree 1988).

Data collection

Perceptions of illegal hunting and protected area law enforcement

Data on local people's perceptions of illegal hunting were collected from eight villages occurring in the four study wards, i.e. two villages per ward, using semi-structured questionnaires administered through face-to-face interviews from December 2010 to May 2011. Perceptions are important because they reflect local people's habitual way of life, as well as their shared expectations or experiences with an activity (Uddin & Foisal 2007). Current village registers of the selected eight study villages formed the sampling pool and households were randomly selected through picking of numbers from a hat that corresponded to the households from each study village register. The household heads were targeted as the respondents. In case of their absence, another permanently resident adult (≥18 years) in the households took part in the interview in his/her residence. Interviews were conducted conditionally upon the individual's willingness to fully participate. Respondents were local villagers and no distinction was made between hunters and non-hunters. This was done to encourage local residents to openly provide illegal hunting information which can be regarded as sensitive.

The date for interview was communicated to each selected household one or two days in advance. Our questionnaire development was informed by a previous survey of perceptions of illegal hunting in southeastern Zimbabwe (Gandiwa 2011). Questions were constructed to seek information on the general perceptions of illegal hunting practices inside the GNP and adjacent areas between 2000 and 2010. Data collected included information on frequency of sighting bushmeat and/or wild animal products being traded, perceptions of illegal hunting trends, hunted animal species, reasons for hunting, and perceptions of protection status in the protected area (Table 1). With the help of one field assistant conversant in local language acting as a translator, we interviewed a total of 236 local residents, who consisted of 146 (62%) men and 90 (38%) women. Interviews took on average approximately 54 min (range: 38–76 min) to complete.

Table 1
Outline of the semi-structured questionnaire used in the household survey in the four study wards adjacent to northern Gonarezhou National Park, Zimbabwe.

Questions	Options provided
Between 2000 and 2010, how often did you see bushmeat or wild animal products being traded in your village or ward?	Once in 30 days/once between 31 and 180 days/once in >6 months/year
In your opinion, what is the trend of illegal hunting of wild animals in your ward and adjacent Gonarezhou National Park in the last eleven years, i.e. between 2000 and 2010?	Increased/decreased/remained the same
What are the reasons for the given trend in illegal hunting?	Open
May you list the wild animal species that were commonly hunted illegally in your ward and nearby Gonarezhou National Park between 2000 and 2010?	Open
In your opinion what are the main reasons why people engage in illegal hunting activities in the area?	Open
What do you think is the trend of protection given to wildlife conservation by the government between 2000 and 2010?	Increased/decreased/remained the same

Protected area law enforcement and illegal activities

We extracted law enforcement data on patrol intensity and evidence of illegal activities in northern GNP for the period 2000–2010 from the law enforcement database kept at Chipinda Pools in GNP. GNP uses the conventional law enforcement in the form of foot patrols that start from each of the ranger camps as well as from the stations' main and sub-offices. Almost all local (day) and long (over several days) patrols are done during the day in the GNP. Only strategic or ambush patrols may extend to the night with patrol rangers remaining in one particular location, often near a frequently used poaching trail, but sometimes in response to intelligence information. Standardised patrol forms were used to keep records of the number of staff on patrol, the exact duration, the area travelled, types, quantities and locations of illegal activity encountered including number of hunters and dogs, number caught, or shot in the case of dogs, number of snares recovered, number and species of animals killed in each incident. The method of conventional law enforcement has been discussed fully elsewhere (Jachmann 2008a, 2008b; Jachmann et al. 2011).

A patrol team in Chipinda Pools normally has four or five patrol rangers. This patrol team size is considered appropriate in savanna ecosystems (Jachmann 2008a, 2008b). In northern GNP, patrol data were checked at debriefing by the Senior Rangers, then by the Senior Wildlife Officer in charge of law-enforcement operations before being captured into a law enforcement database. The relationships between the law-enforcement effort and encounters with illegal activity and wildlife assume that patrol reports are reliable accounts of the activities of the patrol staff, both in terms of technical precision and in terms of being a true account of events (Jachmann 2008a). The law enforcement data for GNP revealed that the Zimbabwe Parks and Wildlife Management Authority (ZPWMA) recruited additional patrol rangers in the year 2004. Furthermore, data on large herbivore population estimates for the northern GNP (i.e. Chipinda Pools, Chilojo A and Chilojo B aerial survey strata), for 2001 and 2009, were extracted from past aerial survey reports (Dunham 2002; Dunham et al. 2010).

respondents ($\chi^2 = 31.05$, df = 2, $P < 0.0001$). However, the relationship between responses on the frequency of sighting illegally hunted animals and/or bushmeat being traded and protection given by government to wildlife was not significant (gamma = 0.07, $P = 0.455$). In contrast, there was a significant relationship between responses on the perceived illegal hunting trends and protection given by government to wildlife (gamma = 0.23, $P = 0.028$).

Law enforcement performance from law enforcement data

In 2000, a total of 18 patrol rangers were stationed at Chipinda Pools, northern GNP translating to 0.006 effective patrol staff/km^2 (Fig. 2a). The number of patrol rangers increased to 51 in 2004 following the recruitments of new rangers (0.017 effective patrol staff/km^2) and by end of December 2010, there were 38

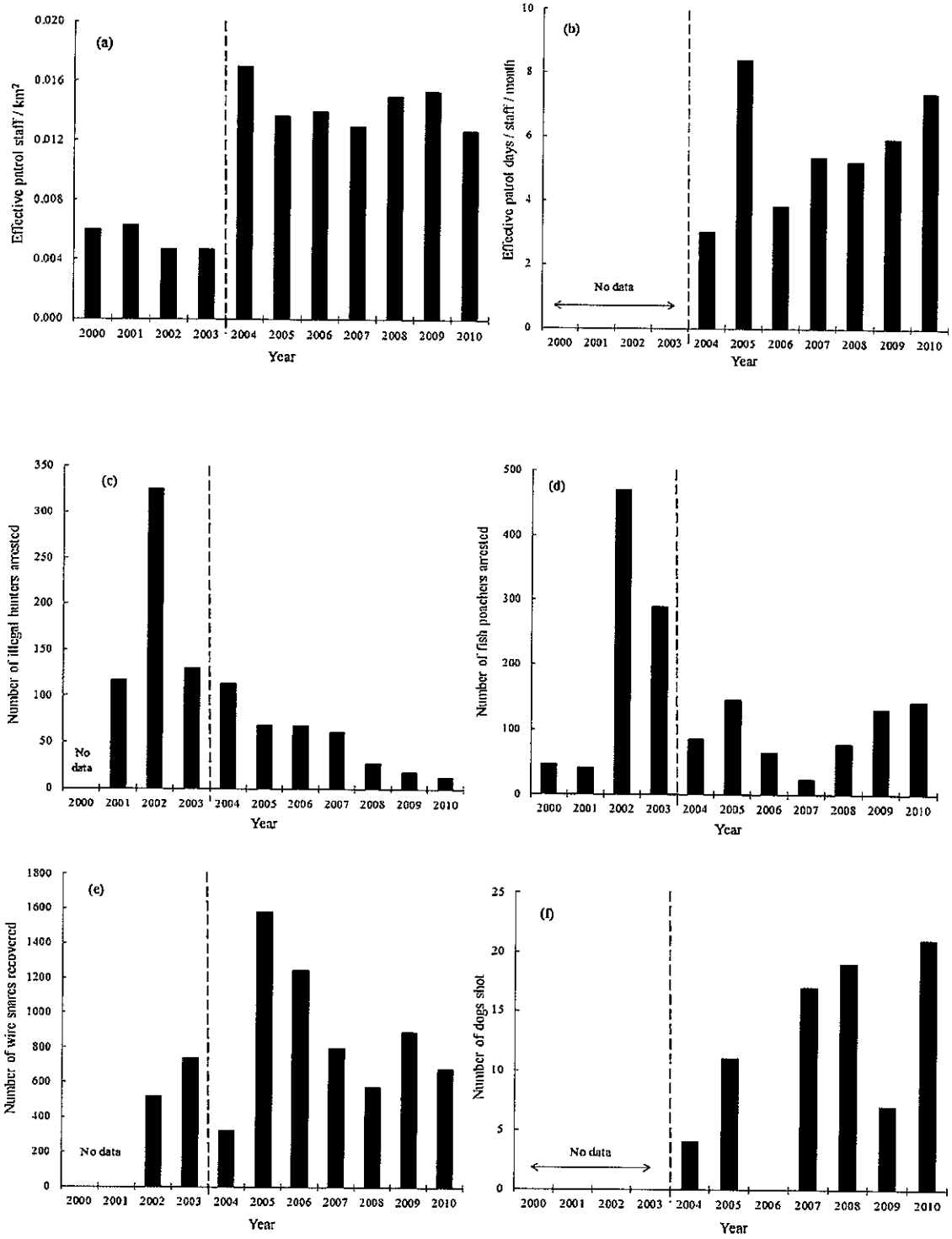

Fig. 2. Trends in law enforcement performance and recorded illegal activities in Chipinda Pools, northern Gonarezhou National Park, Zimbabwe, from January 2000 to December 2010. *Notes*: Dashed vertical lines separate the period before and after recruitments of patrol rangers.

longer went to the central government but was directly channelled to conservation (Mtsambiwa 2003). Sport-hunting has been the major revenue source for the ZPWMA and other local conservation areas. Surprisingly, sport-hunting was not severely affected by the political instability and economic decline in Zimbabwe (Balint & Mashinya 2006; Lindsey et al. 2009). Consequently, ZPWMA was able to enhance wildlife protection in the northern GNP by increasing the number of patrol rangers in 2004 (from 18 to 51 rangers). However, in terms of personnel, the coverage area per ranger in 2010, i.e. one ranger for every 79 km^2 of protected area, is far higher than the recommended minimum of one park ranger for every 24 km^2 of protected area if effective patrolling and policing is to be realised (Jachmann & Billiouw 1997). Furthermore, anti-poaching efforts in the northern GNP were also strengthened by the involvement of the Frankfurt Zoological Society in the management of the park since October 2007, which led to more resources being made available for law enforcement activities. The recurrent expenditure for law enforcement in northern GNP rose from USD 52 per km^2 annually in 2000 to USD 250 per km^2 annually in 2010. The increase in law enforcement expenditure is above the minimum range of expenditure estimated to be between USD 50 and 200 per km^2 annually that wildlife agencies in Africa need to protect large herbivores, in particular elephants, in their natural ranges (Jachmann & Billiouw 1997).

We recorded that illegal hunters hunted a wide range of animal species in this study. Out of the 26 animal species reported as being illegally hunted, 20 animal species were recorded as having been illegally killed in GNP. Differences in the number of animal species most illegally hunted are likely come from the fact that most of the animal species that were not recorded as illegally hunted are small herbivores, which are difficult to detect when illegally hunted. Our study shows that small to medium body sized animals, for example impala, were the most illegally hunted species. Subsistence hunting is primarily targeted at small-bodied species like impala with large-bodied animals such as elephants targeted for their trophies such as ivory. Some of the illegally hunted species in the northern GNP are of conservation concern: crocodile is classified as lower risk; elephant, lion, cheetah, hippopotamus are classified as vulnerable, and leopard is classified as near threatened on the IUCN Red List (IUCN 2012). Using a vulnerability classification approach based on species vulnerability to decline and extinction involving opinions from international and local experts, Van der Hoeven (2007) categorised leopard as least concern, buffalo as lower risk and elephant as vulnerable. The differences in these two vulnerability classifications points to the need for more detailed local assessments of animal species that allows the setting of appropriate local level conservation priorities (Van der Hoeven 2007).

Hunting for wild animals in the northern GNP is, just like in other regions across the globe, stimulated by the need to meet nutritional, economic, cultural and recreational requirements (Bitanyi et al. 2012; Brashares et al. 2011; Golden et al. 2011; Grey-Ross et al. 2010; Hofer et al. 2000; Rao et al. 2005; Wilkie et al. 2011). Subsistence hunting is done mainly for domestic consumption or for selling within the community (Gandiwa 2011). The reasons given for illegal hunting in the present study suggest that the main drivers of bushmeat hunting and trade include need for bushmeat, money and unemployment. Our study contributes to the increasing evidence for illegal hunting in protected areas throughout Africa for the bushmeat trade, particularly in southern Africa.

Our results show that with increased illegal hunter's arrests, there was a shift to snaring as more wire snares were recovered by law enforcement staff. Snares are regarded as the simplest and most effective hunting devices (Fa & Brown 2009; Hurt & Ravn 2000; Jachmann 2008b). It has been suggested that, with increased law enforcement efforts in an area, illegal hunters were likely to switch to less detectable methods such as snaring, and target smaller sized mammals such as impala (Gibson & Marks 1995). Elsewhere, in the Serengeti National Park, Tanzania, illegal hunters were reported to use a variety of hunting methods with snaring being the common hunting method (Holmern et al. 2007; Hurt & Ravn 2000; Nyahongo et al. 2005). However, in areas outside the Serengeti National Park, where law enforcement was regarded as low, hunters were reported to actively stalk their prey (Holmern et al. 2006) and use other hunting methods such as guns, spears, and bow and arrows. Furthermore, Ngurdoto Crater, which was nearly as rich in wildlife as Ngorongoro Crater, also in Tanzania, lost its wildlife due to illegal hunting with dogs that were kept in underground pens to prevent discovery in the 1970s and 1980s (H.H.T. Prins, *personal observation*).

Our results using law enforcement and large herbivore population data from the northern GNP suggest that pressure from illegal hunting is light as some large herbivore populations increased in population sizes between 2001 and 2009 despite a total of approximately 500 wild animals having been illegal hunted between 2000 and 2010, and also the recorded human settlement encroachments in a small portion of north-western GNP (Gandiwa et al. 2011; Mombeshora & Le Bel 2009). In contrast, it has been reported that most wildlife population declines following the political instability and economic decline in Zimbabwe since 2000 were recorded in private game ranches or farms following widespread poaching associated with the land invasions and collapse of law enforcement systems in some areas (Chaumba et al. 2003; Degeorges & Reilly 2007; Wels 2003; Williams 2011; Wolmer 2005). Elsewhere, in much of tropical rainforest ecosystems populations of many large bodied wildlife species have already declined or were extirpated because of habitat loss and hunting, leaving a fauna consisting predominantly of resilient, rapidly reproducing species (Barnes 2002; Bennett et al. 2007; Harrison 2011; Peres 2000, 2001; Van der Hoeven 2007; Wilkie et al. 2011). Therefore, evaluating the sustainability of hunting is key to the conservation of species exploited for bushmeat (Ling & Milner-Gulland 2006; Milner-Gulland & Akçakaya 2001). Because large body size is correlated with slow breeding, large animals would be more susceptible to extinction under any environmental or anthropogenic impact that targeted slow breeders (Koch & Barnosky 2006).

Although there was an economic collapse in Zimbabwe (Coltart 2008), the country fell back to a subsistence economy, in which there was only limited violence and no refugees, and this may have prevented an increase in illegal hunting over the study period. Furthermore, remittances from those who had migrated outside of Zimbabwe played an important role in the day-to-day survival of local people (Makina 2012) and could also have eased the demand for trade in bushmeat to raise income. Similarly, the emigration of local people living adjacent to the GNP to neighbouring countries, mostly South Africa and Mozambique, to look for employment and/or to commercial farms under the land reform programme could have led to a decline in illegal hunting pressure in the GNP. Elsewhere, in the Central African Republic (Blom et al. 2005), Democratic Republic of Congo (Beyers et al. 2011; Draulans & Van Krunkelsven 2002; Yamagiwa 2003), and Rwanda (Kanyamibwa 1998), human conflicts such as civil wars and economic collapse led to substantial negative impacts on wildlife and conservation, resulting in significant losses of wildlife due to institutional collapse, lawlessness and uncontrolled exploitation of natural resources such as bushmeat.

Our study shows that political instability and economic collapse do not necessarily lead to increased hunting in situations where policy instruments, such as law, are enforced. In addition, increasing law enforcement helped minimise the level of illegal hunting in GNP. Therefore, over an 11-year period (i.e. 2000–2010), our study does not support the first hypothesis that illegal hunting activities would be increased due to economic collapse. However, our

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UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

SAFARI CLUB INTERNATIONAL	)	
	)	
Plaintiff,	)	Civ. No. 14-cv-00670(ABJ)
	)	
v.	)	
	)	
SALLY M. R. JEWELL, et al.	)	
	)	
Defendants	)	
	)	

DECLARATION OF HERMANUS ABRAHAM DE VRIES

I, Hermanus Abraham De Vries, being first duly sworn on oath, depose and state as follows:

1. I am a resident of Hillside, Bulawayo, Zimbabwe.

2. I am a professional hunter and safari outfitter. I work with my son Thys De Vries in the business of providing hunts in Zimbabwe.

3. I have been a life member of Safari Club International for about 29 years.

4. I have been an affiliated member of the CAMPFIRE Association of Zimbabwe for 15 years.

5. I have been an outfitter for about 40 years. As an outfitter, I usually provide around 25 elephant hunts each year. I personally guide about 3 of them each year. I provide hunts in several areas of Zimbabwe: Tsholotsho South and Lusulu, Binga CAMPFIRE areas and Ngamo/Sekumi, Pandamasui and Kazuma Forest areas.

6. In the Tsholotsho South area, the permanent elephant population is around 2,000. The migratory elephant population is around 8,000. The permanent population is in good health. The migratory population from Hwange National Park is in poor health during the dry months (August to November). The behavior of the populations is calm.

7. In the Lusulu area, the permanent elephant population is approximately 100 elephants. The migratory elephant population is around 600. Both populations are in good health and demonstrate calm behavior.

8. In the Pandamasui and Kazuma Forest areas, the permanent elephant population is about 2,000 elephants. The migratory elephant population is about 8,000. Similar to the Tsholotsho South area, the permanent population seems to be in better health than the migratory population. These areas are also on the border of Hwange National Park.

9. In all the areas in which I provide hunts, the local communities have learned the value that the elephants have due to the value of elephants to hunters. For that reason, the communities have taken on a role of ownership and responsibility for the elephant herds. The locals want to conserve the elephants and peacefully co-exist with them. However, with an ever increasing population, there is more human and elephant conflict, especially when elephants destroy maize fields. The locals consider elephants to be a nuisance when they destroy their crops. The value that hunting gives to the elephants helps to balance against the nuisance that these animals cause.

10. I have not witnessed poaching in the CAMPFIRE areas in which I provide hunts, but I have seen poaching in the neighboring Hwange and Chizirira National Parks. The company that I work with actually uncovered the cyanide poison poaching that occurred in Hwange National Park. Our scouts detected the poachers that were poaching with cyanide. We have 25 permanent scouts between our two areas that patrol on a daily basis. They quickly discovered the source of the poaching and limited the damage done to the elephant herd.

11. I find it ironic that the anecdotal evidence on which the U.S. Fish and Wildlife Service relied to implement the importation ban came from our guides. The Fish and Wildlife Service cited the Hwange National Park cyanide poisoning as anecdotal evidence; although, they incorrectly stated that 300 elephants were killed. It was actually only 132. The company that I work with uncovered this horrific incident. Within 24 hours of seeing the first tracks of the poachers, we had arrested the poachers and the buyers. The company that I work with funded the entire operation to catch them. We paid for the vehicles, fuel, food, camping gear, etc. We hired the helicopter to do aerial reconnaissance, for transport to remote areas, and to get the exact number of elephants poached. It cost us around $100,000 for the operation. Without the U.S. hunters that pay a premium to hunt elephants, we would not have had enough money to fund this operation. We also would not have been in the area to uncover the incident. Hunters and hunting operators are the first line of defense in the fight against poaching. Without

hunters and hunting operators in the field, poachers will get a free pass to slaughter elephants at will.

12. With the funds that we receive from U.S. hunters, we are able to fund conservation operations, including anti-poaching efforts, wildlife water supply, and local community education and dialogue. The areas in which we hunt are CAMPFIRE areas, so the local communities receive 70% of the total revenue, either by direct payment or other social benefits that the outfitters give to the local communities. If U.S. hunters stop hunting in Zimbabwe, we will not have the funds to pay for all of these programs and the locals will receive fewer benefits from elephant hunting. In addition, the local communities in our areas receive all the meat from the sport-hunted elephants. That is about 50 tons of much needed protein, something that is very rare in this part of the world.

13. If we do not receive the income that U.S. hunters provide for elephant hunts in our CAMPFIRE areas, we cannot put money into our conservation operations. We will not be able to pay the local communities or be able to carry out our social responsibilities for the local communities. We will not be able to build new classrooms and medical clinics. We will not be able provide transportation for the elderly. We will not be able to provide anti-poaching operations or help Hwange National Park scout with patrols, logistics, food and fuel. Without these services and payments, the locals will view elephants as a burden.

14. About 80% of our clientele that hunt elephants are from the United States. If we lose 80% of our income, it will be about $500,000.00 lost. We actually had an American hunter on the ground hunting when we received news of the trophy importation ban. He stopped his safari and returned home. The immediate cost just from that one safari is significant. Furthermore, we have invested a lot of money into marketing in the United States. We will now have to market in other countries and try to sell 80% of our elephant quota all over again.

15. Even if we are able to sell some of the hunts to non-U.S. hunters, it is very unlikely that we will ever make our money back. The American market for elephant hunting is the biggest in the world. We will never generate the same amount of revenue by selling the hunts to non-U.S. hunters, especially so late in the year. The market in Zimbabwe is now flooded with elephant bulls and a quarter of the year has passed, so we cannot sell the hunts for as much money.

16. It is common knowledge that Zimbabwe's elephant population is bursting at the seams, especially in the western area of Zimbabwe. Eliminating U.S. hunters from the equation will only exacerbate the problem.

17. I submit this declaration in support of Safari Club International's efforts to

challenge the U.S. Fish and Wildlife Service's decision to prohibit the importation of sport-hunted elephant trophies from Zimbabwe and Tanzania in 2014.

In accordance with 28 U.S.C. §1746, I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Dated this 26 day of April, 2014, at 13 Percy Ave, Hillside, Bulawayo, Zimbabwe.

Hermanus Abraham De Vries

[redacted]

[redacted] Plaintiff

Civ. No. 14-cv-00670(ABJ)

[redacted] Defendants

DECLARATION OF MARTIN PIETERS

I, Martin Pieters, being first duly sworn on oath, depose and state as follows:

1. I am a resident of Burnside, Bulawayo, Zimbabwe.
2. I am a Safari Operator and Professional Hunter.
3. I am a life member of Safari Club International and have been so for six years.
4. I am a member of the Zimbabwe Professional Hunters and Guides Association, a past Chairman and a Committee Member (over seven years) of the Safari Operators Association of Zimbabwe (ten years).
5. I am currently involved in constructing a conservancy in the Zambezi Valley known as Mackenzies Conservancy and the Lime River Conservancy. This is a joint venture with Nyaminyami Rural District Council and the community.
6. I am 41 years old and have been an outfitter for 21 years.
7. I provide and/or guide hunts primarily in Zimbabwe, but have also operated in Zambia, Botswana and South Africa as an agent.
8. I have provided and/or guided for elephant hunts for 20 years.
9. I provide and/or guide for over 20 elephants hunts each year.
10. I operate in various areas in northwest Zimbabwe. In these areas, I have witnessed the fact that elephant populations are abundant and elephant numbers are increasing.

In contrast to the Zambezi Valley, elephant numbers are decreasing due to heavy poaching.

12. I operate in CAMPFIRE Area (Communal Area Management Programme for Indigenous Resources) where the local communities derive direct benefits from hunting via payments and meat. As a result of these benefits, the local residents are willing to co-exist with the elephants.

13. In the last three years, I have witnessed a large increase in elephant poaching by armed poachers. This is having an impact on the elephant population in the Zambezi Valley. This is not the case in northwest Zimbabwe where the population is on an increase and where there are heavy armed anti-poaching patrols.

14. Controlled sport hunting has a large impact on poaching. The fact that hunters, together with professional hunters, trackers and others, drive around the areas in the hunting season is enough to deter most poachers. We are always on the lookout for their tracks and listen for their gun shots.

15. Hunting operations like mine are one of the most effective anti-poaching weapons. We conduct anti-poaching activities with trained scouts and fund these efforts out of our own pockets.

16. There is no question that hunting enhances the survival of elephants in Zimbabwe. Monies generated from sport hunting allows us to protect the species. We invest that money in educating local residents, anti-poaching efforts, pumping water and monitoring elephant populations.

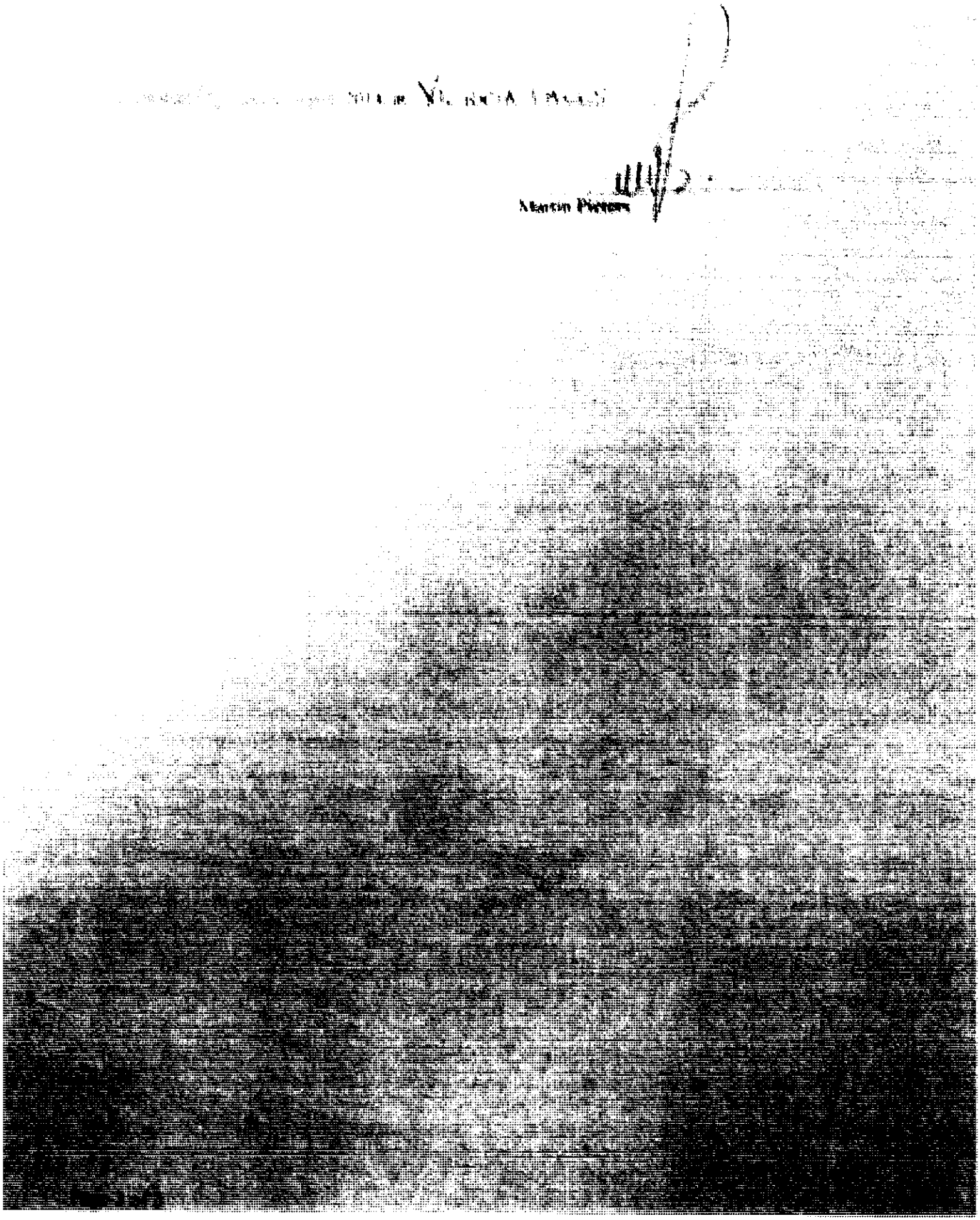
17. The U.S. ban on elephant trophy importation will harm elephant conservation by decreasing the number of U.S. hunters. Businesses like mine will attempt to sell cancelled or unsold elephant hunts to non-U.S. hunters, but this will likely be at reduced prices due to the fact that the season is now well underway and that non-U.S. hunters bring less revenue into the country. Our business is bound to be harmed as we lose a major market share and as other countries (and their hunting operations) bargain us down on elephant hunt rates.

18. If the value of an elephant hunt decreases, that means less revenue for anti-poaching and other species protection efforts.

19. Sadly, if the importation ban continues, it will be directly responsible for the demise of the African elephant in Zimbabwe.

20. I submit this declaration in support of Safari Club International's efforts to challenge the U.S. Fish and Wildlife Service's decision to prohibit the importation of sport-hunted elephant trophies from Zimbabwe and Tanzania in 2014.

In accordance with 28 U.S.C. §1746, I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.



Poaching May2014
(850 words until June 1st)

24.5.2014
978 words

First Draft

Hunters United against the Poaching Crisis in Africa

Considering the large number of high-level international conferences on wildlife poaching and trafficking that has taken place in recent months, the crisis should be solved by now. But nothing could be further away from the truth. The carbon emissions of traveling international wildlife experts and politicians were inversely proportional to the practical outcomes for elephants and rhinos.

The usual suspects see a fresh chance to combat legal hunting. They claim that in the face of widespread poaching in Africa legal hunting must also stop, in particular for elephant and rhino. The European Parliament even accepted with a great majority a (non-binding) resolution and demanded „stiffer penalties to combat trophy hunting and the organized criminal killing of wildlife". The American Government was quick to ban the import of elephant hunting trophies from Zimbabwe and Tanzania. They did this without considering the negative effects for elephant conservation and without even consulting with their own Embassies. This shows clearly that this move was nothing else but a pay back to an anti-hunting clientele back home. Willy Pabst owns a property in the Save Valley Conservancy in Zimbabwe. He spends hundreds of thousands of dollars to protect his elephants, rhinos and other game against the poachers. And now the US-Government deprives him of one of the few possibilities to finance at least part of his operation. Willy has this to say about the US ban: *"We have built up our elephant population from 553 individuals in 1993 to over 1,500, a population which it too large for our 300,000 hectares. The SVC developed a highly professional elephant management in 2007 with funds assistance from US F&WS. The elephant management plan as well as resultant monitoring data are available to anyone who wants to see it. The SVC spends in total about $ 750,000 pa on anti poaching measures of which some $ 330,000 are spent specifically on protecting our over 140 rhinos. Take away the 7 elephant bulls we allow ourselves to hunt per year our revenue is reduced by about $ 350,000 and will have the most direct and dramatic*

effect on anti poaching in general and rhino's and elephants in particular. No one in the SVC is remotely breaking even, therefore any loss of revenue goes directly towards cutting program costs.

It is well known that Zimbabwe has a huge overpopulation of elephants and while there may not be a recent National Survey to scientifically prove this, an indication that this would be required in order to prevent such a ban is the least that could be expected. Many in Zimbabwe will agree that there are currently some practices that need to be reviewed and improved upon, such as the ration hunting within National Parks, better quota monitoring and allocation, surveys etc. It would have been a great opportunity for FWS to exert a some pressure to ensure better practices regarding these issues. The way it has been handled means this opportunity has probably been lost FWS's actions are counterproductive in the extreme." Willy summarizes: "*The US ban is irresponsible, unprofessional and utterly counterproductive".*

We as hunters have a special responsibility to come out and protect our wildlife in this crucial time. We are there where the wildlife is and the illegal killings occur. Hunters must show zero-tolerance for wildlife crime and all illegal wildlife use and crime, as the President of the International Council for Game and Wildlife Organization (CIC) said during a Summit on poaching in Milan in April. Responsible hunters have always fought wildlife crime. Well-regulated, sustainable use is an essential part of wildlife conservation. It has proven to be most effective, when the economic and cultural interests of local communities and indigenous peoples are met and their cooperation in wildlife conservation systems is ensured. The sheer presence of hunters on the ground reduces the incidence of wildlife crime.

The CIC called during its summit on the global hunting community at every level local, national and international to join forces with public, community and private partners as well as wildlife conservation organizations to arrest and reverse wildlife crime through evidence□based, pragmatic, timely and coordinated actions.

Talking is not enough. What is needed is concrete action on the ground. Immediately after the Summit, in which the Chief Warden of the Tanzanian Selous Game Reserve had attended as a main speaker, a "Selous Elephant Emergency Project" was devised. Under the guidance and in cooperation with the Tanzanian Wildlife Division several partners will immediately contribute to efficient anti-poaching and a rehabilitation of the reserve. A consortium consisting of "Deutsche Gesellschaft fuer Internationale Zusammenarbeit" (GIZ), Frankfurt Zoological Society, CIC,

Conservation Force and others has committed around 500,000 Euro to stop poaching until a major and long term German Government project will start next year. Germany has supported the Selous between 1987 and 2003 and will continue to do so starting next year with eight million Euros.

The United States had also some support for Tanzania's elephants apart from banning trophy imported. The US "International Conservation Caucus Foundation" initiated an elephant conference in Dar es Salaam in May. There was no pledging, but a resolution, which was interestingly enough signed by most European ambassadors, but not by the United States, which had more or less conducted the conference. And the two major accomplishments of the Tanzanian Wildlife Summit according to ICCF's website are the creation of a Tanzania Wildlife Authority and the employment of 900 additional rangers. The Authority has been under preparation already for more than two years and needs only a Parliament decision and that 900 rangers are to be employed was announced by the Minister several weeks ago. Most interviews with applicants were actually complete before the summit. Instead of organizing more carbon emission events of frequent flyers the US-Government can be strongly advised to lift its counterproductive sanctions.

DAPU - Overview

The Plight of Poaching

In 2010 Charlton McCallum Safaris took over the Dande East ('East') and the Dande Safari Area ('DSA') we soon realized that rampant poaching was something that needed to be dealt with much more effectively. The National Parks staff in the DSA were doing a decent job. However the community scouts in the East, with no incentives and seldom getting paid were an ineffective unit.

The East was considered a depleted area, only good for early season crop raiding elephant bulls from Mozambique. The primary reason for this was that the previous hunting operator only hunted the early season for elephant. Then pulling out for the rest of the year leaving it wide open to uncontrolled poaching.

In 2009 CMS enlisted the help of Dr. Russell Taylor to carry out a 'capacity study' in the East. His theoretical results were amazing and he estimated that the area could safely hold 1000 buffalo, 500 kudu, 500 sable etc.

With this in mind as soon as our contract started in 2010, we immediately formed the DANDE ANTI POACHING UNIT (DAPU). To date our full time teams in the East have picked up over 5000 snares and have arrested over 60 poachers (in four years). The game has rebounded strongly which is extremely gratifying. In 2013 we took over Dande North ('North') once again unifying it with the DSA and discovered the same sad story existed with the North. As of 2014 DAPU now supports both the East and North community scouts. The crux of the matter is that DAPU has now out grown our small company and we simply cannot afford to keep up the financial effort. Expenses and incentives paid out keep increasing, but we have to continue with our anti poaching!

CMS will continue funding the bulk of all expenses, however we hope your contributions will assist us to expand DAPU, ultimately improving the Dande North and East hunting concessions for the benefit of all hunters to come and the local communities.

You would be able to contribute to this worthy cause by hunting with us and donating $20 per hunting day or by sending a check to Conservation Force to make a tax deductible donation!

Tackling the Problem

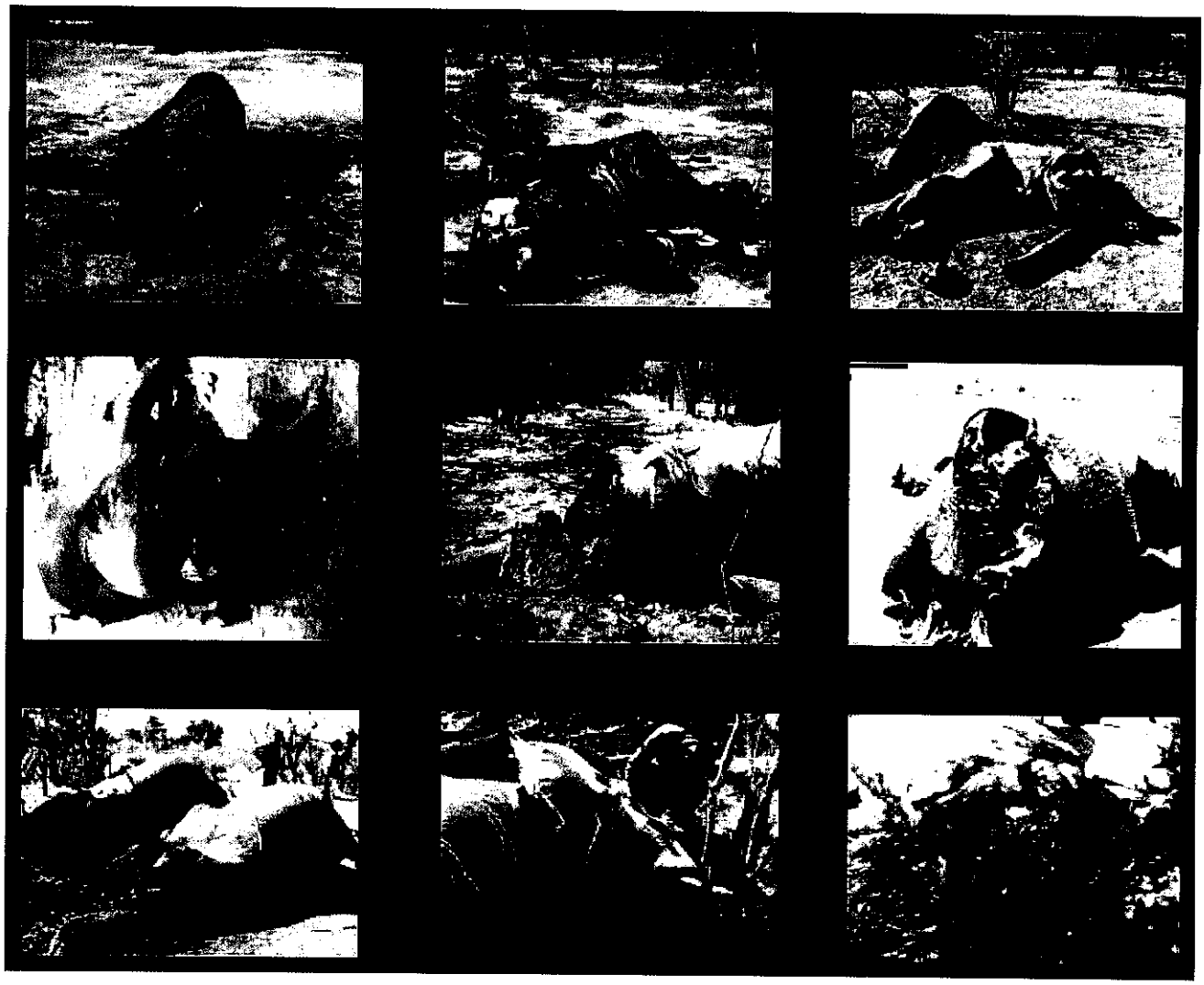
Rehabilitation first meant taking over the community game scouts and re-energizing them. This we did at CMS expense:

1. Retrained them through a recognised anti poaching course.
2. Began to share the burden of monthly scout wage payments that council and communities were unable to honour.
3. Supply monthly rations.
4. Supplied the Game scouts with 2 way radios.
5. Supplied the Game Scouts with clothing, hats, safety boots, tents, torches, knives etc
6. Employed Bongi to spearhead the anti poaching unit. He uses one of CMS cruisers to do this.

In 2011 the Dande Safari Area, like the rest of the country, suddenly saw a marked increase in elephant poaching. Our National Parks as keen as they are were under funded, demoralised and often unable to respond to situations due to having only one vehicle, in a deplorable state to patrol the whole area, CMS has taken the burden of:

1. Helping drop and pick up patrols.
2. Supplying the Rangers with rations for patrols.
3. Incentives for successful patrols.
4. Repairing the National Park vehicle and keeping it on the road.
5. Donating diesel monthly to keep the National Parks vehicle running.

The crux of the matter is that we simply, as a small company, cannot afford to keep up the financial effort, as expenses and incentives paid out keep increasing. At the same time we realise that we cannot, discontinue the effort.



What more is CMS Doing?

We also offered the following incentives to the Game scouts:

1. Cash bonuses for snares found
2. Cash bonuses for dogs shot
3. Cash bonuses for meat poachers arrested and convicted
4. Cash bonuses for meat poaching informer
5. Cash bonuses for meat poachers given to anti poaching manager in the area
6. Cash bonuses for ivory informer
7. Cash bonuses for ivory poachers arrested and convicted
8. Cash bonuses for ivory poachers given to anti poaching manager in the area

2013 onwards - How can you Help?

In 2013 we expanded our operation by buying out Gavin Rorke Safaris who were operating the Dande North Communal area being ward 1 and Ward 2. By doing this we once again unified the whole of the Dande, beneficial to not only the game but the communities within the whole area.

With the successes in the DSA and the East we feel that it is imperative that we once again take on the 12 community scouts for Dande North communal areas and turn them into an effective anti poaching unit funded and organised by ourselves. By doing this we will incur the same costs as listed above and the same incentives will apply.

CMS would greatly appreciate any assistance in helping us continue this good cause that has resulted in the Dande being the most sought after valley safari area.

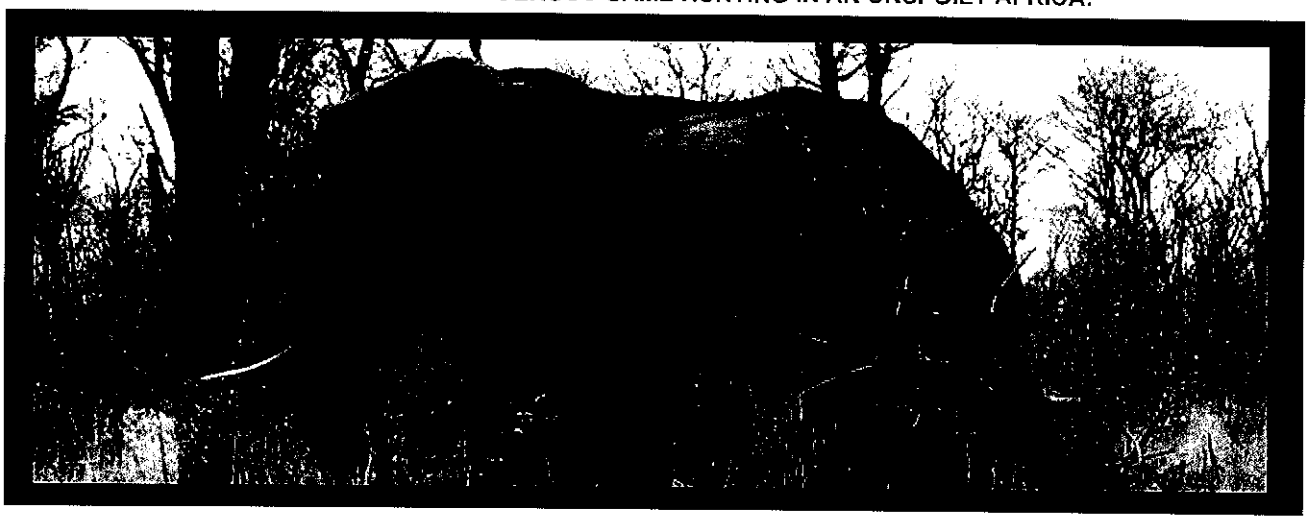
Do you want to help? Would you like to assist in ending the poaching? Help us financially assist this project, donate a monetary amount for CMS to allocate as needed or to sponsor a game scout. Any donation, no matter the amount, will help in the fight against poaching and will be greatly appreciated. Your donation can be tax deductible - click here to learn how.

Sponsor a Game Scout

For an anti poaching unit to be effective they need to have a basic level of equipment and you can help us achieve this by sponsoring any of the 24 Game Scouts and or their equipment for the 2014 season:

Number	Description	Cost Each	Total
24	wages ($50 x 13 months)	650	15600
24	Boots per year	25	600
24	Uniforms per year	60	1440
24	Socks per year	10	240
24	Hats per year	7	168
4	Etrex GPS units	100	400
24	Water Bottles per year	5	120
24	Handcuffs	25	600
4	Motorola handheld radios	350	1400
24	Sleeping Bags	50	1200
24	Camping Mattresses	50	1200
12	Two Man Tents	30	360
24	Solar Torches per year	30	720
24	Knives per year	5	120
24	Backpacks	75	1800
4	pump action shotguns 12GA	1000	4000
	TOTAL COST in USD	**1 249**	**29 968**

LET'S STAND TOGTHER TO SAVE THE ANIMALS AND OUR PRIVILEDGE TO HUNT THEM AND EXPERIENCE THE WONDERS OF DANGEROUS GAME HUNTING IN AN UNSPOILT AFRICA.



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Updates

May Report 2014

1st May, Aleck ,Petros , Liberty deployed at 222 fly camp.

Uplifted on the afternoon of the 5th , recovering 22 snares and one spring loaded squirrel trap.

6th May myself Aleck , Modern, Petros , Liberty, and Washington patrolled from Mosambique pan through broken bridge to Kamota Membwe to Kanyemba over a period of 4 days.

7th May during the evening we planned a raid to catch a poacher who had killed a leopard which we got information about via our informer. We caught 3 guys from manga area who were involved in the killing of the leopard the previous month. What had happened was one of them had a problem with bush pigs raiding his crops. Brighton, so he set up snares around his field boundary intending to catch a bush pig but managing to snare a leopard, hearing the struggle and realising what it was he called his two neighbours for assistance and killed the leopard using spears and axes, which we confiscated .We investigated the scene of the crime the following morning after reporting the case at the National parks office. Together with the National parks ranger we looked for evidence of a skin, skull or any remains of the carcase but we could not find anything, Brighton claimed he had burnt the carcase which we doubted so we then took all three of them to the Kanyemba police station where they were questioned Brighton admitted guilty and the other two were witnesses to the crime.on the 10th of May Brighton was taken to court in Guruwe.

9th May team rotations from team A to team B and issues of our new DAPU uniforms, sponsored by SCI Houston Chapter.

Five, Moses, and Member deployed at the Cliffs on a 4 day patrol.

April Report 2014

1st April Petros, Trymore & Liberty from team A deployed at matombo camp, and Washington.Aleck & Modern deployed at Mugwededza spring.

No activities in and around Mugwededza spring area so team redeployed on the 4th of April at mariangwa range spring.

Siraaj and Muno walked down with the team Washington Aleck and Modern, to the spring where we came across an old blood trail and a lot of hyena activity and vulture droppings. Just 40 meters away we came across the carcass of a young elephant bull which sadly had been poached the carcass was roughly three weeks to one month old , all the ivory had been removed and taken. We left the team for five days to cover the area and look for tracks and signs and the whereabouts of the poachers and to see if they would return.

8th April rotated team A. Deploying Petros ,Washington and Trymore at pedza to patrol the surrounding areas, and Aleck, Member and Liberty in Kanyemba based at Matombo camp.

13th April Aleck, Liberty and Member caught two Zimbabwean poachers in the act at nyadewe spring they had two dogs , one got shot. two spears retrieved , two axes , and 27 snares found in that area.

14th April rotation from team A to team B , every 14 days we rotate the teams and mix them equally with half from ward 2 and the other half from ward 1.

15th April Bhisiweki,Elphas and Moses, deployed by Masoka- pans to patrol the whole area up to Mariangwa range.Bhachi, Member and Five deployed on manemu river beyond the cliffs .

16th April I got a report of some poacher activity by Buzz up by the Maunde I organised my team, and a national parks ranger as we were in the DSA , for a four day patrol of the area.the tracks we followed were of four poachers two bare foot and two were wearing shoes, they never left the river and as from all the evidence we found over the days they turned out to be fish and honey poachers, they had been poisoning pools for fish with natural fish poison plant material, netting , and using stick rods.We had come across where they had been camping out and drying their fish, and eating honey and birds and tortoises.

21st Bhachi, Member and Five deployed on the Mazantanda befor broken bridge to patrol up to Kanyemba.Myself Bhisiweki, Elphas and Moses deployed at katsabvu area.

22nd April team patrolled the Kamuzaza stream and removed 22 large game snares, no activity in marirambwa area.

23rd we were redeployed further up on black store road junction early in the morning.patrolled Kanyenzwa southern side, found four old snare lines at chamakuwa and a lot more old snare lines in and around mavhu pan area.

The second team came across fish poaching activity all along the Mwazamutanda. where fish traps and fish poison had been used.32 snares were removed from Chamakawa river , kamota nakamhembwe area.

Kanyenzwa westernside,Nwadewe area and spring no poaching activity but lots of game.

25th both teams split and patrolled Masau area and Nyahari , no poaching activity but lots of movement of game.

26th was our day of uplift from kanyemba and time for rotating the teams from team B to team A.

28th I deployed team A. Washington.Aleck,Liberty and modern close to Gwededzi spring.

30th all of DAPU team salaries paid.

March Report 2014

First team deployed team A patrolling Masoka loop road area, one snare found.

No activities reported from Mariangwa range or Iririra , no snares found.

7th of March Deployed team A at Matombo camp to patrol the area for 7 days before the two week team rotations start.

On the 7th March we made our first arrest of two Zambian poachers netting fish in front of Matombo camp, retrieved their nets and canoe and turned them in to National Parks.

In-between the patrols we got call outs for PAC on elephants raiding crops from early afternoon till late at night which we assisted with by means of scareing .All PAC stopped on the 12 March till further notice because of a few encounters we had from the members of Manemu area.

15th of March beginning of the first rotation.

Team B split into two one half deployed to patrol pedza pasi village area and boundary, and the other to patrol Masoka area along the Mukanga and Angwa including the inland pools team based at the old fly camp.

38 snares found around Pedza Pasi village.

18th Two poachers pursued and chased but managed to get away retrieving two spears and shooting two dogs in masoka area.

On the 22nd we got a report from council about a young bull elephant in Mazambara which trampled an 18 year old boy we were given two days and the go ahead to shoot the elephant as a problem animal , unsuccessful as the bull did not return to the site and with further threats from the villagers and surrounding villages and lack of co-operation we pulled out as it was getting out of hand and dangerous , from there again all PAC stopped.

29th March Rich Tabor reported that an adult ram impala one day old caught in a snare 100 meters in off the main road to Mukanga before the first bridge on the right hand side of the road his trackers and parks scouts.

Retrieved 7 snares in total.

Salaries paid to all scouts on the 30th.

March 2014

On Andrew Thigpen's hunt in Dande North, Richard and the team came across an impala that had been caught in a snare. Long dead, the poachers had not as yet had a chance to come collect the carcass. Further on bones from previous kills were also found, picked clean by carrion

February 2014

We have employed Siraaj Gardner to oversee DAPU and its exercises. Time has been spent mobilizing all 24 scouts who are now fully kitted out and doing local patrols. However as expected at this time of the year poaching is at a low with all the water around from the rains and with the game dispersed. Siraaj and the game scouts from the Northern ward did manage to arrest some illegal fish poachers and hand them over to the police. Apart from the local patrols the DAPU scouts have been involved in chasing elephant out of the fields at night as we have found that if that is not done the villagers often take the matters into their own hands. Resulting in them shooting at the elephant often wounding them in a desperate effort to save their crops. Later in the month when we have finished the roads, allowing access to the furthermost areas, the patrols will increase. However what is encouraging is that we have finished 3 safaris and combined with the numerous patrols that DAPU have done we have not found any elephant carcasses which indicates that this off season the poaching activity was low

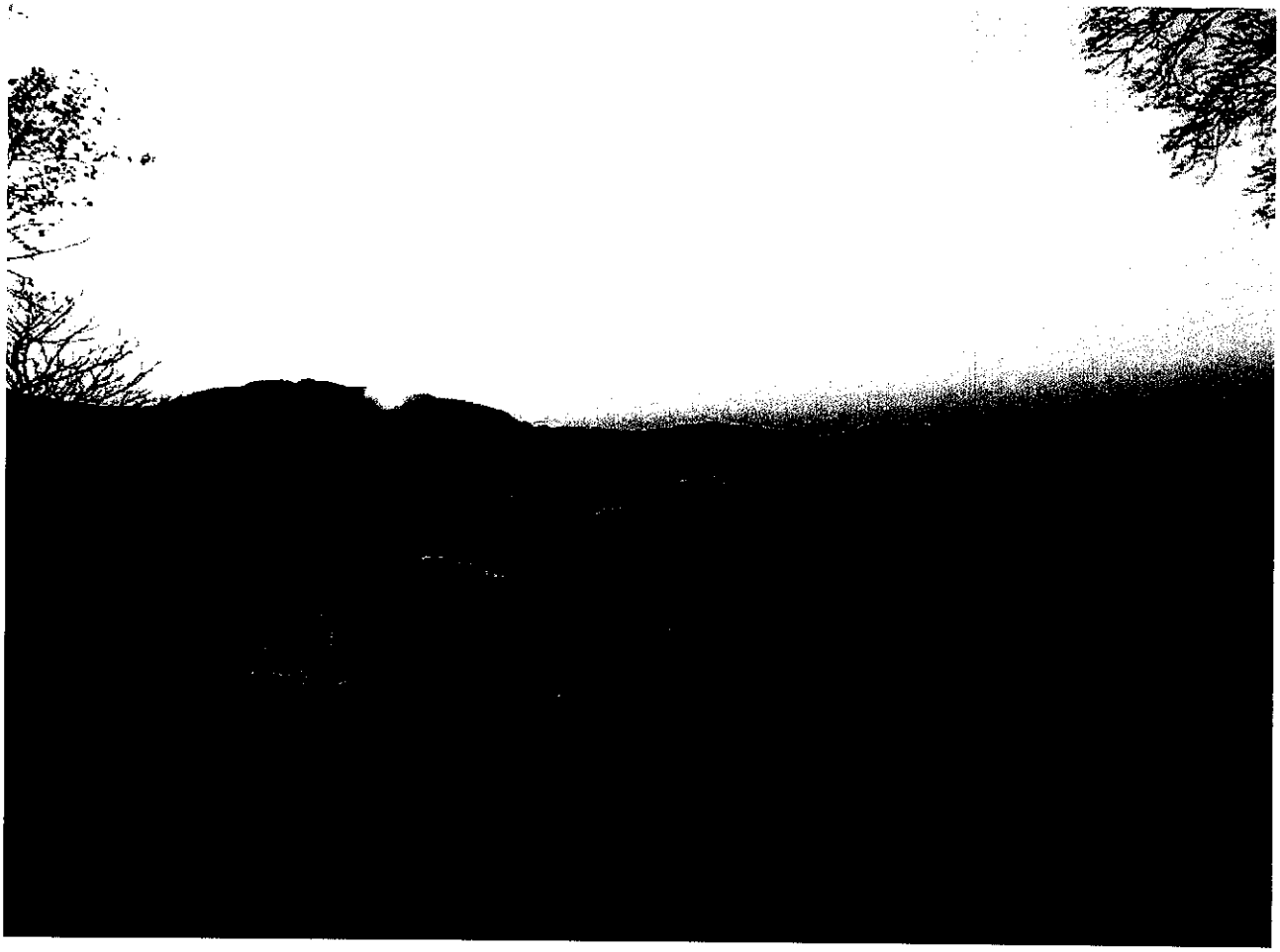
November / December 2013 - Dande East

We have put a huge effort into Dande East. There was a lack of water in the mid-season – forcing the game to go back to Mozambique where the poaching is terrible. Trying to rectify this we drilled 4 boreholes, all turned out to be dusters. As a last resort we hired a buildozer and have put in three big dams two of which were dedicated to game and the third to community livestock.

The other exciting development in the east is that we managed to persuade all the communities within the area that a conservancy was in their best interest, and agreed on boundaries that they cannot settle in or cultivate. This will be a huge development in our future plans for the conservancy. December 2013 saw the bulldozer complete the cut lines before the rains decended in January 2014

October 2013 - Dande East

The results were fantastic - with over 40 poachers being arrested, 100 dogs shot and more the 3000 snares taken out of the bush. This has resulted in an amazing transition in the East with sable and buffalo herds and the plains game making an incredible come back. Below: Bongi & the team with snares collected.



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UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

SAFARI CLUB INTERNATIONAL 501 2nd Street NE Washington, DC 20002, Plaintiff, v. SALLY M. R. JEWELL, in her official capacity as Secretary of the U.S. Department of the Interior; U.S. DEPARTMENT OF THE INTERIOR, an agency of the United States; DANIEL ASHE, in his official capacity as Director of the U.S. Fish and Wildlife Service; and U.S. FISH AND WILDLIFE SERVICE, an agency of the United States 1849 C Street, NW Washington, DC 20240, Defendants.	)	Civ. No. 14-00670(ABJ) DECLARATION OF JOHN C. BARTH

I, John C. Barth, being first duly sworn on oath, depose and state as follows:

1. I am a safari hunting consultant, safari outfitter and booking agent and own Adventure Unlimited, Inc. in Corpus Christi, Texas.

2. I have been a member of Safari Club International for the last 15 years. I have been an exhibitor at Safari Club International's Convention each year for the last 14 years.

3. I am also a member of the South Texas SCI Chapter and was previously a member of the Texas Hill Country SCI Chapter.

4. I am also a member of the International Professional Hunters Association, Coastal Conservation Association, and the National Rifle Association.

5. I have been a professional outfitter for 20 years.

6. I have provided hunts in Zimbabwe, Tanzania, Zambia, Botswana, Mozambique, Cameroon, Central African Republic, Benin, South Africa, Namibia and Ethiopia.

7. Elephant hunts are my specialty area of focus. For the past 15 years I have provided between 5 and 25 elephant hunts per year.

8. I primarily provide elephant hunting opportunities in Zimbabwe around the Hwange National Park.

9. The locals that live in that area of Zimbabwe fully support and depend on the legal sport hunting of elephants. In the hunting concessions we hunt in Zimbabwe and used to hunt in Botswana, revenue generated from trophy hunting is the only source of conservation dollars being brought into the region. The revenue pays for simple things like food, shelter and supplies for anti-poaching teams. It pays for diesel fuel to run pumps at water wells where animals drink, and it pays the local communities for the crops lost from elephant damage.

10. I understand that poaching is an issue in Zimbabwe. A professional hunter that I work with in Zimbabwe helped bring down the poaching ring that poisoned elephants in the Hwange National Park. It was this incident that the U.S. Fish and Wildlife Service cited in their press release regarding implementation of the importation bans. It was because of the presence of hunting operations that the poachers were caught and punished.

11. From my experience, areas of Zimbabwe that have legal safari operators as their hunting concession holder are well patrolled by anti-poaching teams. Areas that do not have safari operators are generally overrun with poachers.

12. On April 4, 2014, the United States Fish and Wildlife Service imposed an immediate importation ban for all sport-hunted elephant trophies from Zimbabwe and Tanzania for all of 2014.

13. The importation bans have already hurt my business. Since the U.S. Fish and Wildlife Service announced its decision, 3 clients have cancelled hunts that were previously booked or arranged for later this year. I also have 7 pending safaris for late 2014 and 12 pending safaris for 2015 that could be cancelled due to the bans. I believe the bans will ultimately destroy my business if not revoked.

14. U.S. hunters pay far higher prices on average than foreign hunters do for elephant hunts. Prohibiting the import of elephant trophies and possibly removing that many elephant hunts will have a damaging impact.

15. I believe the bans will be extremely detrimental to elephant conservation in Zimbabwe and Tanzania. I do not think the U.S. Fish and Wildlife Service realizes how many thousands of elephants will die as a result of the bans. If hundreds of U.S. hunters cancel their elephant hunts, many of the anti-poaching teams will not have an operating budget and the employees will not be paid. Many locals will lose their incentive to not poach elephants and other species.

16. I believe the bans will have the exact opposite effect that was intended. Many more elephants will die as a result of the bans.

17. I submit this declaration in support of Safari Club International's efforts to challenge the U.S. Fish and Wildlife Service's decision to prohibit the importation of sport-hunted elephant trophies from Zimbabwe and Tanzania in 2014.

In accordance with 28 U.S.C. §1746, I declare under penalty of perjury that the foregoing is true and correct.

Dated this 22 day of April, 2014, at Corpus Christi, TX.

John Barth

John C. Barth

Status of Elephant Populations, Hunting and Anti Poaching Effort in Safari Areas in Zimbabwe

Report Compiled by the Safari Operators Association of Zimbabwe (SOAZ)

Introduction

The objective of this report is to provide basic information on the current status of elephant populations, the quotas of elephant hunted from these populations, the people dependent on the safari hunting both commercial operators and their staff and communal and also the levels of anti poaching employed. It has been hastily compiled from a number of safari operators in response to the recent announcement by US Fish & Wildlife Service of a suspension of the import of trophies from elephant sport hunted in Zimbabwe during 2014.

We have received information from fourteen safari operators in Zimbabwe. The operations of these companies cover a wide range of safari concessions including Government Safaris Areas, Campfire Areas and Private Conservancies. They also include safari concessions in the three main wildlife systems in Zimbabwe being; (1) Zambezi Valley and Sebungwe, (2) the North West including Hwange / Matetsi / Vic Falls and (3) the South & South East Lowveld including Gonarezhou, Save Valley Conservancy & Bubye Conservancy.

While there are many more than 14 safari operators in Zimbabwe, we are confident that this covers a wide enough cross section of operations and safari concessions that the information gathered provides good, recent information on the status of elephant populations and with regards dependents and financial information, is representative of the safari industry at large. Given more time we could canvas more operators and produce a more detailed report.

2. Elephant Populations and levels of Poaching

2.1 South and South east Lowveld

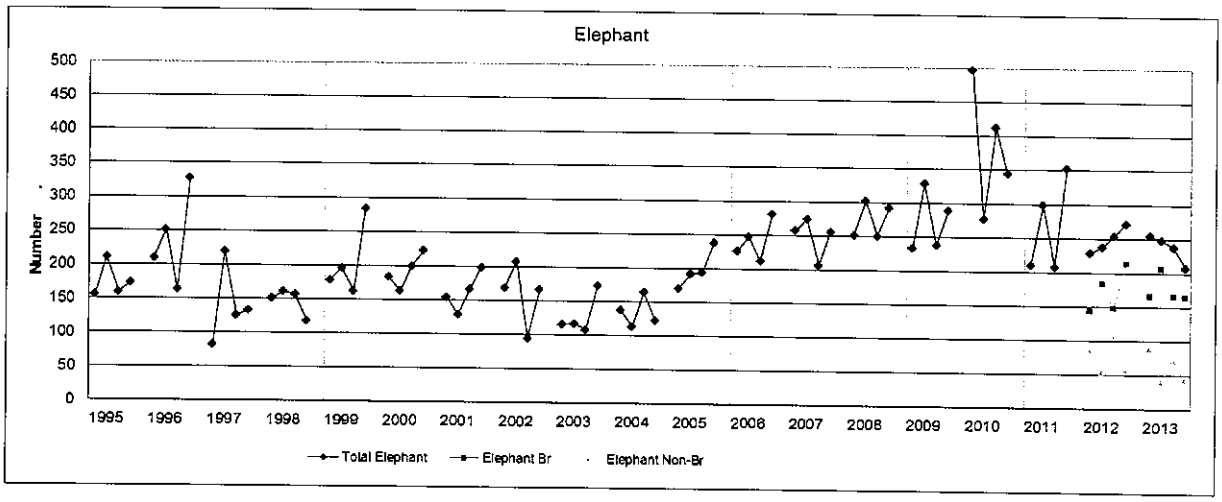
An aerial survey of **Gonarezhou National Park** last year put the elephant population at over 10,000 (Kevin Dunham per com.). This is the highest number recorded yet for the park which has a carrying capacity estimated at about 3,000. In 2007 the population was estimated at 5,000 elephants (African Elephant Database 2007). Frankfurt Zoological Society entered into a management partnership with Zimbabwe's Parks and Wildlife Management Authority (PWMA) in 2008 and have provided funding for management functions such as anti poaching. As a result, the instances of elephant poaching within the Park have been negligible and by all accounts, the elephant population continues to increase. There are a number of safari concessions bordering or close to the Gonarezhou Park including Mahenye, Chitsa, Naivasha, Malipati, Sengwe and Gonakudzingwa. These concessions have few resident elephant and are dependent on the elephant moving between the areas and the National Park. In total, an average of 40 elephant bulls are shot from these concessions each year.

In the **Save Valley Conservancy** there is an estimated population 1538 elephant based on a total aerial count conducted in September 2013. This has increased from an estimated 990 in 2006. Save Valley Conservancy conducts an annual aerial count and has done so since 2002 (reports are available). It also has an Elephant Management Plan which was developed in 2004 with financial assistance from the US Fish & Wildlife Service. There are no cases of elephant being poached within the Save Valley Conservancy. There are cases of elephant that have picked up snares and due to the nature of the wounds, having to be put down.

In **Bubye Conservancy** they have an estimated 540 elephant. This is a growing population and they have no recorded cases of elephant poaching. Bubye provided 39 elephant in 2013 to the newly formed Nuanetsi Conservancy in southern Zimbabwe as a nucleus population for this new wildlife area. This is evidence for the range of elephants in Southern Zimbabwe increasing.

2.2 Zambezi Valley and Sebungwe

The Zambezi Valley downstream of Kariba may be holding more than 20,000 elephants (Dunham obtained an estimate of 20,000 in 2003). This figure is far more than is believed to be sustainable (Martin, R. per com.). Reports of illegal hunting in the Zambezi Valley suggest that elephant poaching is manageable and that it isn't having a significant impact on the population. The Wildlife and Environment Society of Zimbabwe have done an annual game count in **Mana Pools National Park** in the middle of the lower Zambezi Valley since 1995. While conducted by wildlife enthusiasts and not as part of a scientific programme, the count uses the same transects and methodology each year and can give an indication of population trend. The results (Figure 1) would indicate a



general increase in the elephant population over the last 20 years.

Figure 1. Number of elephant recorded during the WEZ Annual Game Count in Mana Pools National Park.

In the **Rifa, Makuti, Nyakasanga** and **Mana Pools** areas of the Zambezi Valley, there were 24 elephant carcasses located as a result of elephant poaching in 2013. A further 29 were recorded in **Chewore North and South** (Louis Muller - ProSafaris, Pers Com.).

In the **Dande Safari Area** and communal Land, Buzz Charlton reported 1 elephant carcasses as a result of poaching in 2013. In 2009 they found numerous carcases. During the period 2009 - 13, they have invested in an anti poaching unit and it would appear to have had a significant impact on reducing the incidents of elephant poaching. Since 2009 when Charlton & McCullam Safaris started operating in Dande they believe that the elephant population has not increased but has remained fairly stable.

The Sebungwe region (the area south of Lake Kariba and predominantly rural communities) has probably suffered a decline in elephant numbers. Dunham (2006) estimated 15,000 elephants in this area but the survey revealed a high proportion of carcases in the sample count. With the human population explosion, there could be as few as 5,000 now (Martin, R per com). Operator Estimates put the population of elephant in **Sengwe** at 600 (Gary Duckworth - Mokore Safaris), **Charisa** at 1000 - 1200 (Philip Smythe - Ivory Trail Safaris) and **Omay** at 250 (Martin Pieters - Bulembi Safaris). These operators have reported a large number of poached elephant carcasses in their areas and it would appear that the elephant in this area are suffering from increased poaching pressure.

2.3 North Western Zimbabwe

Extrapolation of the numbers from the last aerial survey of elephant in Hwange, conducted 2008, would put the elephant population at some 50,000 (Martin R, pers com). In the remainder of Matabeleland North (the area between Hwange and the Victoria Falls there may another 5,000-10,000 elephants. There is immigration taking place from the large, unmanaged Botswana elephant population.

There have been a number of cases recently which have highlighted the poaching of elephant in this region. At the end of 2013 there were 106 elephant carcasses found that had been poisoned by cyanide in specific water holes. The people responsible for this were caught and received significant prison sentences. There have been no further cases of poisoning reported. In the last month, two gangs of poachers from Zambia have been apprehended, one gang carrying 37 tusks. The authorities reacted to information in both these incidents and the poachers were apprehended. However, the elephant population would appear to be increasing in Hwange National Park and there are no indications it is declining.

Barry Style from Buffalo Range Safaris reports that in Matetsi Unit 6 and the Forestry / Ngamo Safaris Areas they have found about 10 elephant carcasses in the last 5 years. He mentions that there was quite a bit of elephant poaching activity three years ago but officers from Zimbabwes PWMA killed and arrested members of two gangs of Zambian poachers and since then it has been largely quiet. They do not believe that the elephant population in Matetsi area has declined.

3. Financial Cost of the Suspension

The results of questionnaire responses from 14 safari operators indicate that for the 110 elephant on quota between them, there will be a combined financial loss of $3,364,450 to them and to Zimbabwe (Table 1). This will have a direct impact on 87 operators and Professional Hunters, 781 Staff, 245 Anti poaching personnel and approximately 108,000 people in rural communities living with elephants.

Table 1. Results to show the number of dependents, elephant on quota and the loss of revenue and hunting days as a result of the US Fish & Wildlife Services suspension on import of elephant trophies for 14 Safari Operators in Zimbabwe

Dependents				Number of Elephant on Quota	HuntingDays Lost due to Suspension	Value of Loss
Operator & PH's	Staff	Anti Poaching	Community			
87	781	245	108312	110	1430	US$3,364,450.00

It is estimated that trophies of 160 sport hunted elephant are imported into the USA from Zimbabwe each year. If the information in Table 1 is extrapolated out for a quota of 160 elephant (i.e. multiply each figure by a factor of 1.45) then we can assume that the financial loss to Zimbabwe of the suspension will be in the region $4,878,452.50. It will have a direct impact on 126 Operators and Professional Hunters, 1132 staff, 355 anti poaching personnel and approximately 155,000 people living in rural communities.

4. Anti Poaching Effort

As has been highlighted in Section 2, there is elephant poaching in Zimbabwe, both from external sources and from within the country. Without control and significant anti poaching effort, there is little doubt that the levels of poaching would increase dramatically and the elephant population in Zimbabwe would be under serious threat.

Table 2 shows that the 14 Safari Operators that responded to the questionnaire spent a combined total of $957,843.00 on anti poaching in their areas and this employs 245 people specifically for anti poaching.

Table 2. The expenditure on Anti Poaching and number of Anti Poaching personnel employed by 14 Safari Operators in Zimbabwe

Anti Poaching expenditure - 2013	Anti Poaching Personnel Employed
US$957,843.00	245

As in Section 3. if these figures are extrapolated out to give figures relative to the 160 sport hunted elephant imported into the USA each year from Zimbabwe, we can make the assumption that US hunters are assisting with the funding of $1,388,872.35 towards anti poaching in Zimbabwe through their safari payments and that this is enabling the employment of 355 anti poaching personnel along with all the equipment and support required. The imposed suspension on the import of sport hunted elephant into the USA from Zimbabwe will have a significant detrimental impact on these figures and in many cases the anti poaching efforts will not be sustained.

5. Conclusions

5.1 The most recent population surveys of elephant in Zimbabwe would estimate the national population to be over 100,000 individuals. This is the highest number of elephant Zimbabwe has had in recent times and represents a significant over population for the available range which will have a negative impact on species diversity.

5.2 The members of SOAZ do not believe that the national population of elephant is in decline or under threat as a result of poaching. On consultation with our members, most populations would appear to be increasing or stable. There does seem to be concern about the elephant population in the Sebungwe region where the impact of poaching is indicated as significant. While much of this information is anecdotal and not based on scientific survey, we are confident that in the vast majority of safari areas throughout the country, the elephant population is not significantly declining or under threat.

5.3 While National Parks provide the primary refuge for elephant populations in Zimbabwe, a significant proportion of elephant live in the safari areas which are generally more marginal in terms of wildlife numbers and often have large rural human populations within or adjacent to them. The role of safari operations in providing a benefit to such communities and enforcing anti poaching as a means of maintaining elephant and other wildlife populations in these areas cannot be underestimated.

We believe that the current suspension by US F&WS will result in the removal of operators from some areas (predominantly the CAMPFIRE areas) and the significant reduction of viability in other areas. This will result in the elephant and other wildlife populations in the affected areas being exposed to an increase in the levels of poaching and, therefore, population declines will result. Such action could have the biggest impact on reducing the available range of elephant in

Zimbabwe of any action taken in recent decades. It is important to note that such a process will not be reversible.

5.4 The suspension on the import of elephant trophies into the USA from Zimbabwe has already had an impact with American hunting clients wanting to cancel or move their safaris. We would like to urge US Fish & Wildlife Service to reverse this suspension as soon as possible to prevent further damage to this industry and the positive work it is doing in protecting the wildlife resource in Zimbabwe.

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Illegal hunting and law enforcement during a period of economic decline in Zimbabwe: A case study of northern Gonarezhou National Park and adjacent areas

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ABSTRACT

Illegal hunting of wildlife, or top-down harvesting, is a major issue in today's society, particularly in tropical ecosystems. There has been widespread concern about increasing illegal hunting of wildlife in most conservation areas in Zimbabwe following the political instability and economic decline the country faced since 2000. In this study, we focused on the northern Gonarezhou National Park (GNP), a large and unfenced protected area, and adjacent communal areas in southern Zimbabwe. We hypothesised that illegal hunting activities would (1) be perceived to have increased due to economic collapse and (2) vary with law enforcement efforts. A total of 236 local residents from eight villages adjacent to the northern GNP were interviewed using semi-structured questionnaires from December 2010 to May 2011, and law enforcement data for northern GNP between 2000 and 2010 were retrieved from the park law enforcement database. A total of 26 animal species were reportedly hunted. Bushmeat consumption and the need for local trade to raise income were reported as the main reasons behind illegal hunting. Contrary to the first hypothesis, the majority of respondents ($n = 156$, 66%) reported that illegal hunting activities had declined between 2000 and 2010 largely due to increased park protection as also supported by law enforcement data. A total of 22 animal species were recorded as having been illegally hunted in northern GNP. The number of illegal hunters arrested declined with increased law enforcement efforts although the number of wire snares recovered and hunting dogs shot appeared to increase following increased law enforcement efforts. These results partly support the second hypothesis that illegal hunting activities would vary with law enforcement efforts.

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Introduction

In tropical areas, humans are commonly physically inseparable from natural systems due to the heavy dependence of local people on natural resources for their subsistence living (Robinson & Bennett 2004; Singh & Sharma 2009). However, this can lead to unsustainable forms of hunting. Illegal hunting, also known as poaching, is the taking of any kind of wildlife, including fish, in such a way that it violates local, national and international wildlife laws (e.g. Duffy 1999). Illegal hunting is often unsustainable and has led to reductions and/or local extinctions of many wildlife populations across the tropical ecosystems (Bennett et al. 2002; Bennett 2011; Ceballos & Ehrlich 2002; Corlett 2007; Emery 2007; Milner-Gulland et al. 2003; Paudel & Kindlmann 2012; Peres 2000; Wilkie et al. 2011).

Illegal hunting involves the use of traditional hunting methods such as bow and arrows, snares, pitfalls (Kümpel et al. 2008; Noss 1998; Tumusiime et al. 2010), but also the illegal use of firearms, explosives, poisons and more recently small aircraft aided techniques and immobilisation drugs. Illegal hunting is particularly severe where rural people hunt within poorly managed protected areas (Fusari & Carpaneto 2006). Although law enforcement patrols attempt to control illegal hunting activities for bushmeat (meat derived from wild animals), and/or commercial sale within conservation areas (Jachmann 2008a, 2008b; Kaltenborn et al. 2008), the expected financial benefits from such activities are far greater than the costs associated with a low probability of arrest and punitive fines (Bennett 2011; Campbell & Hofer 1995; Loibooki et al. 2002; Moyle 2009). Illegal hunting is also influenced by a poor definition of property rights to wildlife species such as no owner (*res nullius*) status (Bulte & Horan 2002; Child & Chitsike 2000).

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When property rights are poorly defined, humans can be expected to expand their hunting effort as long as hunting is more beneficial (profitable) than alternative activities, or until there are zero profits in hunting for bushmeat (Bulte & Horan 2002). Enforcement efforts against wildlife trade in developing countries have generally been unstructured, unstrategic and underfunded; hence allowing the proliferation of illegal wildlife trade (Parr 2011).

Illegal hunting is a major problem throughout Africa (Barnes 2002; Brashares et al. 2011; de Boer et al. 2007; Fa & Brown 2009; MacKenzie 2012). Most illegal hunting studies in Africa have concentrated on central and western tropical forests on the mainland (Barnes 2002; Bennett et al. 2007; Brashares et al. 2004; Fa et al. 2006; Kümpel et al. 2010; Laurance et al. 2008; Wilkie & Carpenter 1999). Illegal hunting issues are increasingly receiving attention in the wildlife rich savanna and miombo woodlands of east and southern Africa as growing evidence suggests that illegal hunting represents high conservation threats in some parts of these regions (Barnett 2000; Fusari & Carpaneto 2006; Golden 2009; Hayward 2009; Jenkins et al. 2011; Lindsey et al. 2011; Nyahongo et al. 2009).

Publicly or state owned protected areas are common property regimes which are set aside for the benefit of society, with the main purpose being the conservation of biodiversity (Clerici et al. 2007; Gaston et al. 2008; Holland 2012; Naughton-Treves et al. 2005). However, disturbances associated with political unrests and economic collapse may result in increased illegal hunting (De Merode et al. 2007; Kanyamibwa 1998; Rowcliffe et al. 2004; Yamagiwa 2003) due to weak policy instruments associated with poor management of natural resources (Bunnefeld et al. 2011). Policy instruments are important in the management of common pool resources, such as wildlife resources, and addressing social dilemmas (Leeuwis & van den Ban 2004). Social dilemmas are situations in which autonomous individuals act in their own rational self-interest, yet the collective outcomes of these independent actions threaten misfortune to all (Karp & Gaulding 1995; Ostrom 2010). Collapse in law enforcement can result in a protected area becoming more characteristic of an open access resource, therefore, leading to a situation reminiscent of what has been classically called "tragedy of the commons" (Berkes et al. 1989; Hardin 1968) where individuals from local communities maximise gain from wildlife resources through increased illegal hunting (Sibanda 1995). Such increased illegal hunting activities, a form of wildlife crime, often leads to species becoming overexploited to increase short-term profits while endangering and eliminating a natural resource for future users (Pires & Moreto 2011). Past studies suggest that illegal hunting activities seem to vary with law enforcement efforts. For instance, poor law enforcement efforts have been linked to declines in wildlife populations as a result of increased illegal hunting (Bassett 2005; Ogutu et al. 2011). In contrast, improved law enforcement efforts have been associated with a reduction in illegal hunting activities (Jachmann 2008a, 2008b; Leader-Williams et al. 1990; Martin 2010). Furthermore, illegal hunting activities have been reported to decrease with an increase in: (i) distance from a protected area boundary (Wilfred & MacColl 2010) and (ii) benefits accrued by local communities from wildlife conservation (Johannesen 2006). In contrast, illegal hunting activities have been reported to increase with an increase in human population density inside or adjacent to a protected area (Metzger et al. 2010; Newmark 2008).

Previous studies provide evidence which suggests that illegal hunting has emerged as a serious conservation threat in Zimbabwe (Duffy 1999; Mapedza & Bond 2006; Wolmer 2005), particularly in fenced privately owned conservation areas that were negatively affected by the land reform process which began in 2000 (Chaumba et al. 2003; Degeorges & Reilly 2007; Lindsey et al. 2011; Wels 2003; Williams 2011). However, there is a gap in literature concerning the extent of illegal hunting and law enforcement efforts in state protected areas in Zimbabwe. These areas are largely unfenced and were less affected by the land reform process since they were not targeted for resettlement under the fast track land reforms. In the current study we attempt to contribute to the understanding of illegal hunting in a state owned protected area bordering communal areas implementing community based natural resources management programmes, namely Communal Areas Management Programme for Indigenous Resources (CAMPFIRE), using a case study from southern Zimbabwe. Wildlife in Zimbabwe is *res nullius* (Cumming 1999). State protected areas in Zimbabwe, particularly national parks, differ from private protected areas in that they have lower manpower levels, fewer financial resources for conservation and are bordered by communal areas which mostly have CAMPFIRE programmes that help local communities and natural resources conservation.

This study focuses in the period covering the political instability and economic decline in Zimbabwe. Between 2000 and 2008, Zimbabwe faced a severe economic crisis (Coltart 2008). The national currency was drastically devalued and the cost of living rose continually (Hanke & Kwok 2009). Many communities especially those in remote areas and around protected areas were left suffering high unemployment and shortages of food and other basic supplies (Coltart 2008). Although sport-hunting in CAMPFIRE areas continued, the cash dividends to local people had little impact on relief of hardships (e.g. Balint & Mashinya 2006). This study therefore concentrates on the largest national park in southern Zimbabwe, namely the northern Gonarezhou National Park (GNP) and adjacent local communities. Specifically, we hypothesised that illegal hunting activities would (1) be perceived to have increased due to economic collapse and (2) vary with law enforcement efforts.

Materials and methods

Study area

Criteria used to select the study area were (i) a large and unfenced protected area (national park) in southern Zimbabwe and (ii) existence of local communities with community based natural resources management programmes adjacent to the protected area. The northern GNP, namely Chipinda Pools and four wards comprising, Chibwedziva and Chizvirizvi falling under the Chiredzi district, and Mahenye and Mtandahwe falling under the Chipinge district, all adjacent to the northern GNP in southeastern Zimbabwe were selected (Fig. 1). Established in the early 1930s as a Game Reserve, GNP was upgraded to a national park under the Parks and Wildlife Act of 1975. GNP was initially fenced during the early 1970s but by the 1990s, most of the fence was lost to vandalism and theft. The study area forms part of the Great Limpopo Transfrontier Conservation Area. The GNP is the second largest national park in Zimbabwe after Hwange National Park and covers an area of approximately 5000 km^2 and is located between 21°00′–22°15′S and 30°15′–32°30′E.

There is a wide variety of large herbivore species in the GNP and these include the African elephant (*Loxodonta africana*), hippopotamus (*Hippopotamus amphibius*), African buffalo (*Syncerus caffer*), giraffe (*Giraffa camelopardalis*), plains zebra (*Equus quagga*), waterbuck (*Kobus ellipsiprymnus*), roan antelope (*Hippotragus equinus*), sable antelope (*Hippotragus niger*), blue wildebeest (*Connochaetes taurinus*), eland (*Taurotragus oryx*), kudu (*Tragelaphus strepsiceros*), nyala (*Tragelaphus angasii*) and impala (*Aepyceros melampus*). The park is also endowed with a variety of large carnivores including the African lion (*Panthera leo*), leopard (*Panthera pardus*) and spotted hyena (*Crocuta crocuta*) (Gandiwa 2012).

The dominant ethnic group in the study area is Shangaan. Local residents in communities adjacent to the northern GNP practice

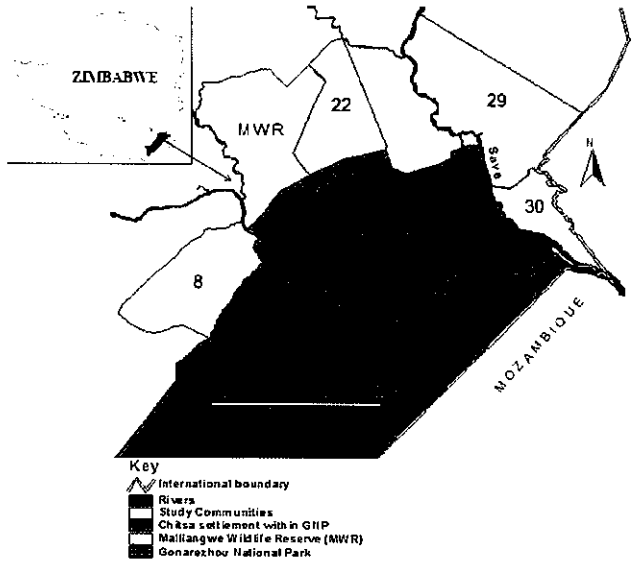

Fig. 1. Location of the four study wards adjacent to the northern Gonarezhou National Park, south-eastern Zimbabwe. *Notes*: 8 – Chibwedziva ward, 22 – Chizvirizvi ward, 29 – Mtandahwe ward and 30 – Mahenye ward.

a combination of subsistence, cash crop farming and livestock production (Gandiwa 2011). These communities manage their natural resources under CAMPFIRE programmes implemented since 1982 in an effort to generate benefits for local communities that otherwise had been deprived by protection policies (Child 1993; Murphree 1988).

Data collection

Perceptions of illegal hunting and protected area law enforcement

Data on local people's perceptions of illegal hunting were collected from eight villages occurring in the four study wards, i.e. two villages per ward, using semi-structured questionnaires administered through face-to-face interviews from December 2010 to May 2011. Perceptions are important because they reflect local people's habitual way of life, as well as their shared expectations or experiences with an activity (Uddin & Foisal 2007). Current village registers of the selected eight study villages formed the sampling pool and households were randomly selected through picking of numbers from a hat that corresponded to the households from each study village register. The household heads were targeted as the respondents. In case of their absence, another permanently resident adult (≥18 years) in the households took part in the interview in his/her residence. Interviews were conducted conditionally upon the individual's willingness to fully participate. Respondents were local villagers and no distinction was made between hunters and non-hunters. This was done to encourage local residents to openly provide illegal hunting information which can be regarded as sensitive.

The date for interview was communicated to each selected household one or two days in advance. Our questionnaire development was informed by a previous survey of perceptions of illegal hunting in southeastern Zimbabwe (Gandiwa 2011). Questions were constructed to seek information on the general perceptions of illegal hunting practices inside the GNP and adjacent areas between 2000 and 2010. Data collected included information on frequency of sighting bushmeat and/or wild animal products being traded, perceptions of illegal hunting trends, hunted animal species, reasons for hunting, and perceptions of protection status in the protected area (Table 1). With the help of one field assistant conversant in local language acting as a translator, we interviewed a total of 236 local residents, who consisted of 146 (62%) men and 90 (38%) women. Interviews took on average approximately 54 min (range: 38–76 min) to complete.

Table 1
Outline of the semi-structured questionnaire used in the household survey in the four study wards adjacent to northern Gonarezhou National Park, Zimbabwe.

Questions	Options provided
Between 2000 and 2010, how often did you see bushmeat or wild animal products being traded in your village or ward?	Once in 30 days/once between 31 and 180 days/once in >6 months/year
In your opinion, what is the trend of illegal hunting of wild animals in your ward and adjacent Gonarezhou National Park in the last eleven years, i.e. between 2000 and 2010?	Increased/decreased/remained the same
What are the reasons for the given trend in illegal hunting?	Open
May you list the wild animal species that were commonly hunted illegally in your ward and nearby Gonarezhou National Park between 2000 and 2010?	Open
In your opinion what are the main reasons why people engage in illegal hunting activities in the area?	Open
What do you think is the trend of protection given to wildlife conservation by the government between 2000 and 2010?	Increased/decreased/remained the same

Protected area law enforcement and illegal activities

We extracted law enforcement data on patrol intensity and evidence of illegal activities in northern GNP for the period 2000–2010 from the law enforcement database kept at Chipinda Pools in GNP. GNP uses the conventional law enforcement in the form of foot patrols that start from each of the ranger camps as well as from the stations' main and sub-offices. Almost all local (day) and long (over several days) patrols are done during the day in the GNP. Only strategic or ambush patrols may extend to the night with patrol rangers remaining in one particular location, often near a frequently used poaching trail, but sometimes in response to intelligence information. Standardised patrol forms were used to keep records of the number of staff on patrol, the exact duration, the area travelled, types, quantities and locations of illegal activity encountered including number of hunters and dogs, number caught, or shot in the case of dogs, number of snares recovered, number and species of animals killed in each incident. The method of conventional law enforcement has been discussed fully elsewhere (Jachmann 2008a, 2008b; Jachmann et al. 2011).

A patrol team in Chipinda Pools normally has four or five patrol rangers. This patrol team size is considered appropriate in savanna ecosystems (Jachmann 2008a, 2008b). In northern GNP, patrol data were checked at debriefing by the Senior Rangers, then by the Senior Wildlife Officer in charge of law-enforcement operations before being captured into a law enforcement database. The relationships between the law-enforcement effort and encounters with illegal activity and wildlife assume that patrol reports are reliable accounts of the activities of the patrol staff, both in terms of technical precision and in terms of being a true account of events (Jachmann 2008a). The law enforcement data for GNP revealed that the Zimbabwe Parks and Wildlife Management Authority (ZPWMA) recruited additional patrol rangers in the year 2004. Furthermore, data on large herbivore population estimates for the northern GNP (i.e. Chipinda Pools, Chilojo A and Chilojo B aerial survey strata), for 2001 and 2009, were extracted from past aerial survey reports (Dunham 2002; Dunham et al. 2010).

Data analysis

Chi-square (χ^2) tests for goodness-of-fit were used to test whether responses on the prevalence of illegal hunting, perceived illegal hunting trends and protection given by the government to wildlife between 2000 and 2010 were different among the 236 respondents using SPSS version 19 for Windows (SPSS Inc., Chicago, USA). We used the response categories outlined in Table 1 in the Chi-square tests. Cross-tabulation with gamma (G) test were used to establish the association between responses on: (i) prevalence of illegal hunting and perceived illegal hunting trends; (ii) prevalence of illegal hunting and protection given by government to wildlife; and (iii) perceived illegal hunting trends and protection given by government to wildlife. We further examined trends in law enforcement performance and illegal activities in northern GNP from 2000 to 2010 to reveal patterns during the period of political instability and economic collapse. Law enforcement performance was evaluated using two measures, namely (i) effective patrol staff density (i.e. number of patrol rangers per km^2) and (ii) effective patrol days/staff/month derived from effective patrol man-days (Jachmann 2008a, 2008b). For the northern GNP, the only readily available patrol data were from long or extended patrols. Effective patrol days for long patrols in northern GNP are indirectly measured by the patrol nights spent by each ranger. Effective patrol time was standardised and converted directly from patrol nights to effective patrol days which were later converted to effective patrol days/staff/month. We examined whether law enforcement performance and illegal activities differed in the two periods, i.e. 2000–2003 and 2004–2010 following the recruitment of more patrol staff in northern GNP in 2004, using independent samples two-tailed t-tests with unequal sizes.

In order to assess the overall effect of law enforcement performance on illegal activities between 2000 and 2010 in northern GNP, we used repeated measures analysis of variance (ANOVA), with law enforcement performance and time (year) as independent variables and illegal activities (hunting and fishing) as dependant variables. Data on effective patrol staff density, arrested bushmeat hunters and fish poachers were $\log_{10}(x+1)$ transformed to meet the normality requirements of ANOVA tests. Furthermore, for common large herbivore species in northern GNP, we calculated percentage population size changes using population estimate data from 2001 to 2009 in order to determine whether animal populations were increasing, decreasing or remained the same.

Results

Perceptions of illegal hunting in northern GNP between 2000 and 2010

Responses on perceptions of illegal hunting trends between 2000 and 2010 varied among the 236 respondents ($\chi^2 = 114.14$, df = 2, $P < 0.0001$). A higher proportion of the respondents ($n = 156$, 66%) perceived that illegal hunting activities had declined whereas 18% ($n = 42$) of the respondents perceived that illegal hunting activities had increased and 16% ($n = 38$) of the respondents perceived that illegal hunting activities had remained the same in the study area between 2000 and 2010. The main reasons for the perceived decline in illegal hunting were reported to include; (i) that poachers were afraid of being arrested or imprisoned due to strengthened law enforcement ($n = 173$, 73%), (ii) the positive impact of conservation awareness and educational programmes ($n = 62$, 26%), and (iii) few firearms were available for use in illegal hunting ($n = 8$, 3%).

Similarly, responses on the frequency of sighting illegally hunted animals and/or bushmeat being traded in the villages between 2000 and 2010 varied among the 236 respondents ($\chi^2 = 15.31$, df = 2, $P < 0.001$). A higher proportion of the respondents ($n = 107$, 45%) reported that they had sighted illegal hunted animals or bushmeat being traded at least once over six months whereas 28% ($n = 65$) and 27% ($n = 64$) of the respondents reported that they had sighted illegal hunted animals or bushmeat being traded at least once between 31 and 180 days, and once in a month respectively. There was a significant relationship between responses on the frequency of sighting illegally hunted animals and/or bushmeat being traded and the perceived illegal hunting trends (gamma = 0.34, $P = 0.002$).

Animal species hunted and reasons for them being hunted

A total of 26 wild animal species, including large herbivores and carnivores, were reported as being illegally hunted in northern GNP between 2000 and 2010, with impala, kudu, buffalo, zebra and spotted hyena being the most hunted (Table 2). Respondents highlighted seven reasons why local people were involved in illegal hunting, namely, (i) the need for bushmeat for domestic consumption ($n = 162$, 69%), (ii) local trade in bushmeat in order to raise money ($n = 132$, 56%), (iii) as a way to minimise crop damage ($n = 42$, 18%) and (iv) livestock depredation ($n = 24$, 10%), (v) hunting for traditional reasons ($n = 24$, 10%), (vi) unemployment ($n = 10$, 4%), and (vii) hunting as a hobby ($n = 7$, 3%).

Perceptions by locals of protection given to wildlife by the government

About 46% ($n = 108$) of the total respondents perceived that protection given by the government to wildlife had increased between 2000 and 2010 in northern GNP whereas 37% ($n = 88$) and 17% ($n = 40$) of the respondents perceived that protection given by government to wildlife had remained the same and decreased respectively. These responses significantly varied among the 236

Table 2
Animal species reported to be commonly hunted illegally in northern Gonarezhou National Park and adjacent areas, Zimbabwe, between 2000 and 2010. Total percentage exceeds 100 because the respondents were allowed to give multiple answers.

Common name	Scientific name	Number of responses	Percentage (%)
Impala	*Aepyceros melampus*	126	53
Kudu	*Tragelaphus strepsiceros*	119	50
Buffalo	*Syncerus caffer*	110	47
Zebra	*Equus quagga*	81	34
Spotted hyena	*Crocuta crocuta*	77	32
Wildebeest	*Connochaetes taurinus*	57	24
Elephant[V]	*Loxodonta africana*	46	19
Warthog	*Phacochoerus africanus*	45	19
Leopard[NT]	*Panthera pardus*	42	18
Eland	*Taurotragus oryx*	40	17
Lion[V]	*Panthera leo*	31	13
Common duiker	*Sylvicapra grimmia*	20	9
Waterbuck	*Kobus ellipsiprymnus*	20	9
Giraffe	*Giraffa camelopardolis*	20	9
Nyala	*Tragelaphus angasii*	19	8
Bushbuck	*Tragelaphus scriptus*	19	8
Cheetah[V]	*Acinonyx jubatus*	17	7
Steenbok	*Raphicerus campestris*	14	6
Reedbuck	*Redunca redunca*	12	5
Baboon	*Papio ursinus*	11	5
Hippopotamus[V]	*Hippopotamus amphibius*	11	5
Nile crocodile[LR]	*Crocodylus niloticus*	10	4
Klipspringer	*Oreotragus oreotragus*	10	4
Sable	*Hippotragus niger*	8	3
Common genet	*Genetta genetta*	5	2
Porcupine	*Hystrix cristata*	2	1

Notes: Species categorised as Vulnerable: V, Lower Risk: LR and Near-Threatened: NT on the 2011 IUCN (*International Union for the Conservation of Nature*) Red List (IUCN 2012).

respondents ($\chi^2 = 31.05$, df = 2, $P < 0.0001$). However, the relationship between responses on the frequency of sighting illegally hunted animals and/or bushmeat being traded and protection given by government to wildlife was not significant (gamma = 0.07, $P = 0.455$). In contrast, there was a significant relationship between responses on the perceived illegal hunting trends and protection given by government to wildlife (gamma = 0.23, $P = 0.028$).

Law enforcement performance from law enforcement data

In 2000, a total of 18 patrol rangers were stationed at Chipinda Pools, northern GNP translating to 0.006 effective patrol staff/km^2 (Fig. 2a). The number of patrol rangers increased to 51 in 2004 following the recruitments of new rangers (0.017 effective patrol staff/km^2) and by end of December 2010, there were 38

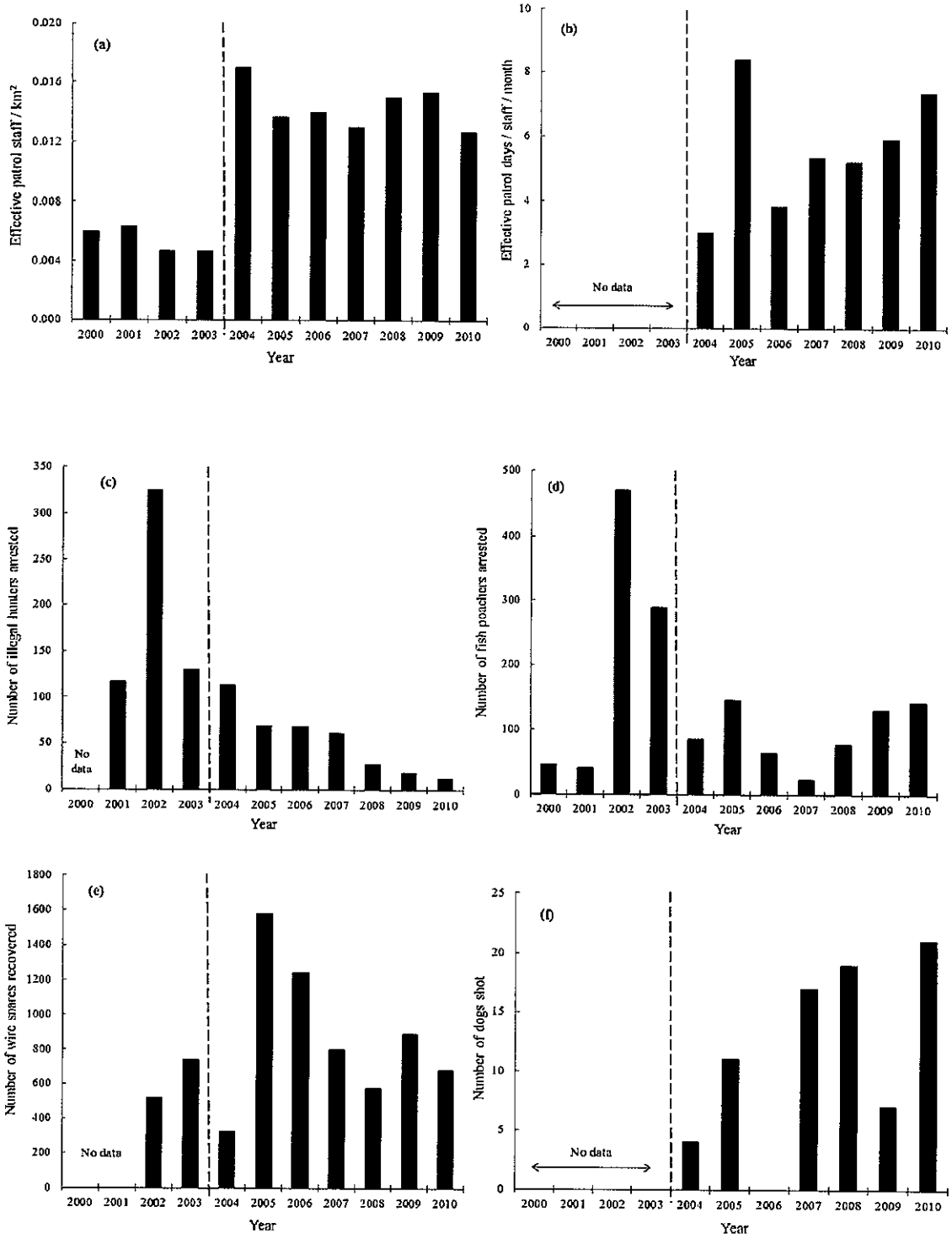

Fig. 2. Trends in law enforcement performance and recorded illegal activities in Chipinda Pools, northern Gonarezhou National Park, Zimbabwe, from January 2000 to December 2010. *Notes*: Dashed vertical lines separate the period before and after recruitments of patrol rangers.

patrol rangers in Chipinda Pools (0.013 effective patrol staff/km^2; Fig. 2a). The mean number of effective patrol staff/km^2 was significantly higher for the period 2004–2010 (mean and standard error: 0.014 ± 0.001) compared to 2000–2003 (0.005 ± 0.0004) ($t = -10.74$, df = 9, $P < 0.0001$). The slight decline in available patrol rangers in Chipinda Pools between 2004 and 2010 was a result of transfers, resignations, retirements and/or natural deaths. Data for patrol days were unavailable for the period 2000–2003. In 2004, staff performance was 3.0 effective patrol days/staff/month but it gradually improved to 7.4 effective days/staff/month in 2010 (mean = 5.59 ± 0.71). The high peak in 2005 coincides with an increase in patrol rangers and patrols in northern GNP (Fig. 2b).

Illegal activities recorded from law enforcement patrols

A total of 940 illegal hunters and 1509 illegal fish poachers were captured, 79 hunting dogs were shot and 7340 wire snares were recovered between 2000 and 2010 in northern GNP. Illegal activities, mainly illegal fishing and hunting, in the northern GNP were high between 2000 and 2003, and declined towards 2010 (Fig. 2c and d). The peak in hunter and illegal fisher arrests in 2002 was associated with increased patrols following human settlement encroachments within the north-western GNP. The mean number of illegal hunters arrested were significantly lower for the period 2004–2010 (53 ± 14) compared to the period 2000–2003 (191 ± 67) ($t = 3.03$, df = 8, $P = 0.016$). The mean number of illegal fish poachers arrested did not differ significantly between the period 2000–2003 (211 ± 104) and 2004–2010 (95 ± 17) ($t = 1.47$, df = 9, $P = 0.176$). The mean number of wire snares recovered did not differ between the period 2000–2003 (628 ± 111) and 2004–2010 (896 ± 160) ($t = -0.76$, df = 7, $P = 0.474$; Fig. 2e). Data for number of dogs shot were unavailable for the period 2000–2003. Four dogs were shot in 2004 and this increased to 21 in 2010 (Fig. 2f). The repeated-measures ANOVA results, with a Greenhouse–Geisser epsilon correction for lack of sphericity in the variance–covariance matrix, indicated no significant illegal activities × year ($F_{1,3.001} = 1.61$, $P = 0.293$), illegal activities × effective patrol days/staff/month ($F_{1,3.001} = 0.95$, $P = 0.403$) or illegal activities × effective staff density/km^2 ($F_{1,3.001} = 0.62$, $P = 0.488$) interactions between 2000 and 2010.

About 499 animals of 22 species were illegally killed between January 2001 and December 2010 (Table 3). Patrol reports showed that most animals were killed by snaring using steel cables from the old cattle veterinary fence, stolen telephone and electricity overhead cables, and old boundary fence. Other hunting methods recorded were using bow and arrows, hunting dogs, firearms mostly for elephants, and poisoning. Impala, kudu and elephants were the most common illegally hunted animals in northern GNP between 2001 and 2010. Large carnivores, namely lion and spotted hyenas were amongst the least illegally killed species. Overall, only 20 animal species were common among the reportedly illegally hunted animals and those that were recorded to have been illegally hunted. Differences in the recorded illegally killed animals and animals perceived to be commonly hunted illegally (Table 2) in northern GNP include four animal species (bushbuck, reedbuck, klipspringer and sable) that were not recorded among the illegally hunted animals. In addition, two animal species (Sharpe's Grysbok and slender mongoose) that were recorded as illegally hunted were not reported to be illegally hunted. Despite the illegal hunting of primarily large herbivores in the northern GNP, most of the large herbivores showed increasing populations sizes between 2001 and 2009. Nyala (+727%), eland (+269%), zebra (+126%) and elephant (+111%) were amongst the species with the highest population size increases (Table 4).

Table 3
Animals recorded lost to illegal hunting in Chipinda Pools, northern Gonarezhou National Park, Zimbabwe, from January 2001 to December 2010, based on law enforcement data. *Notes*: BW – bow and arrow; F – fire arm; HD – hunting dogs; P – Poison; and S – snaring.

Common name	Scientific name	Total killed	Hunting method used
Impala	*Aepyceros melampus*	194	S/HD
Kudu	*Tragelaphus strepsiceros*	58	S/HD
Elephant[V]	*Loxodonto africana*	54	F/S
Nyala	*Tragelaphus angasii*	31	S/HD
Zebra	*Equus quagga*	27	S
Warthog	*Phacochoerus africanus*	21	S/HD
Eland	*Taurotragus oryx*	18	S
Buffalo	*Syncerus caffer*	16	S
Wildebeest	*Connochaetes taurinus*	13	S
Common duiker	*Sylvicapro grimmia*	11	S/HD
Waterbuck	*Kobus ellipsiprymnus*	11	S/HD
Giraffe	*Giraffa camelopardalis*	9	S
Steenbok	*Raphicerus campestris*	7	S/HD
Baboon	*Papio ursinus*	6	HD
Sharpe's Grysbok	*Raphicerus sharpei*	5	S/HD
Hippopotamus[V]	*Hippopotamus amphibius*	5	P
Spotted hyena	*Crocuta crocuta*	3	P
Porcupine	*Hystrix cristata*	3	BW
Nile crocodile[LR]	*Crocodylus niloticus*	2	P
Lion[V]	*Panthera leo*	2	S
Slender mongoose	*Galerella sanguinea*	2	HD
Common genet	*Genetta geoetta*	1	HD
Total	–	499	–

Notes: Species categorised as Vulnerable: V and Lower Risk: LR on the 2011 IUCN Red List (IUCN 2012).

Discussion

Local people near protected areas in tropical ecosystems adapt to disturbances or hardships caused by economic collapse, social unrest, military or political conflict through migration or diversifying income, including illegal fishing and hunting (Beyers et al. 2011; Brashares et al. 2011; De Merode et al. 2007; Draulans & Van Krunkelsven 2002; Fusari & Carpaneto 2006; Yamagiwa 2003). Contrary to perceived collapse of wildlife management systems in Zimbabwe since 2000 (The Guardian 2008), our results show that law enforcement performance was strengthened in 2004 in the northern GNP which could have resulted in the overall perceived decline in illegal activities by the study respondents. The then Department of National Parks and Wildlife Management was transformed into a parastatal, namely ZPWMA starting in 2000 following the amendment of Zimbabwe's Parks and Wildlife Act (1975) with full implementation in 2002 (Mtsambiwa 2003). This transformation resulted in a direct increase in funds available for wildlife management since income generated by the ZPWMA no

Table 4
Estimated population sizes (±standard errors) and percentage change in common wild animals between 2001 and 2009 in northern Gonarezhou National Park, Zimbabwe. *Notes*: n.a. – not available; dash (–) denotes not applicable.

Common name	2001	2009	Percentage change (%)
Nyala	37 ± 12	306 ± 49	+727
Eland	74 ± 25	273 ± 84	+269
Zebra	286 ± 84	647 ± 109	+126
Elephant	2628 ± 441	5543 ± 386	+111
Waterbuck	168 ± 50	326 ± 109	+94
Kudu	889 ± 166	1445 ± 337	+63
Giraffe	60 ± 12	95 ± 21	+58
Impala	2432 ± 294	3660 ± 630	+50
Buffalo	919 ± 216	1163 ± 337	+27
Wildebeest	n.a.	266 ± 51	–

Source: Dunham (2002) and Dunham et al. (2010).

longer went to the central government but was directly channelled to conservation (Mtsambiwa 2003). Sport-hunting has been the major revenue source for the ZPWMA and other local conservation areas. Surprisingly, sport-hunting was not severely affected by the political instability and economic decline in Zimbabwe (Balint & Mashinya 2006; Lindsey et al. 2009). Consequently, ZPWMA was able to enhance wildlife protection in the northern GNP by increasing the number of patrol rangers in 2004 (from 18 to 51 rangers). However, in terms of personnel, the coverage area per ranger in 2010, i.e. one ranger for every 79 km^2 of protected area, is far higher than the recommended minimum of one park ranger for every 24 km^2 of protected area if effective patrolling and policing is to be realised (Jachmann & Billiouw 1997). Furthermore, anti-poaching efforts in the northern GNP were also strengthened by the involvement of the Frankfurt Zoological Society in the management of the park since October 2007, which led to more resources being made available for law enforcement activities. The recurrent expenditure for law enforcement in northern GNP rose from USD 52 per km^2 annually in 2000 to USD 250 per km^2 annually in 2010. The increase in law enforcement expenditure is above the minimum range of expenditure estimated to be between USD 50 and 200 per km^2 annually that wildlife agencies in Africa need to protect large herbivores, in particular elephants, in their natural ranges (Jachmann & Billiouw 1997).

We recorded that illegal hunters hunted a wide range of animal species in this study. Out of the 26 animal species reported as being illegally hunted, 20 animal species were recorded as having been illegally killed in GNP. Differences in the number of animal species most illegally hunted are likely come from the fact that most of the animal species that were not recorded as illegally hunted are small herbivores, which are difficult to detect when illegally hunted. Our study shows that small to medium body sized animals, for example impala, were the most illegally hunted species. Subsistence hunting is primarily targeted at small-bodied species like impala with large-bodied animals such as elephants targeted for their trophies such as ivory. Some of the illegally hunted species in the northern GNP are of conservation concern: crocodile is classified as lower risk; elephant, lion, cheetah, hippopotamus are classified as vulnerable, and leopard is classified as near threatened on the IUCN Red List (IUCN 2012). Using a vulnerability classification approach based on species vulnerability to decline and extinction involving opinions from international and local experts, Van der Hoeven (2007) categorised leopard as least concern, buffalo as lower risk and elephant as vulnerable. The differences in these two vulnerability classifications points to the need for more detailed local assessments of animal species that allows the setting of appropriate local level conservation priorities (Van der Hoeven 2007).

Hunting for wild animals in the northern GNP is, just like in other regions across the globe, stimulated by the need to meet nutritional, economic, cultural and recreational requirements (Bitanyi et al. 2012; Brashares et al. 2011; Golden et al. 2011; Grey-Ross et al. 2010; Hofer et al. 2000; Rao et al. 2005; Wilkie et al. 2011). Subsistence hunting is done mainly for domestic consumption or for selling within the community (Gandiwa 2011). The reasons given for illegal hunting in the present study suggest that the main drivers of bushmeat hunting and trade include need for bushmeat, money and unemployment. Our study contributes to the increasing evidence for illegal hunting in protected areas throughout Africa for the bushmeat trade, particularly in southern Africa.

Our results show that with increased illegal hunter's arrests, there was a shift to snaring as more wire snares were recovered by law enforcement staff. Snares are regarded as the simplest and most effective hunting devices (Fa & Brown 2009; Hurt & Ravn 2000; Jachmann 2008b). It has been suggested that, with increased law enforcement efforts in an area, illegal hunters were likely to switch to less detectable methods such as snaring, and target smaller sized mammals such as impala (Gibson & Marks 1995). Elsewhere, in the Serengeti National Park, Tanzania, illegal hunters were reported to use a variety of hunting methods with snaring being the common hunting method (Holmern et al. 2007; Hurt & Ravn 2000; Nyahongo et al. 2005). However, in areas outside the Serengeti National Park, where law enforcement was regarded as low, hunters were reported to actively stalk their prey (Holmern et al. 2006) and use other hunting methods such as guns, spears, and bow and arrows. Furthermore, Ngurdoto Crater, which was nearly as rich in wildlife as Ngorongoro Crater, also in Tanzania, lost its wildlife due to illegal hunting with dogs that were kept in underground pens to prevent discovery in the 1970s and 1980s (H.H.T. Prins, *personal observation*).

Our results using law enforcement and large herbivore population data from the northern GNP suggest that pressure from illegal hunting is light as some large herbivore populations increased in population sizes between 2001 and 2009 despite a total of approximately 500 wild animals having been illegal hunted between 2000 and 2010, and also the recorded human settlement encroachments in a small portion of north-western GNP (Gandiwa et al. 2011; Mombeshora & Le Bel 2009). In contrast, it has been reported that most wildlife population declines following the political instability and economic decline in Zimbabwe since 2000 were recorded in private game ranches or farms following widespread poaching associated with the land invasions and collapse of law enforcement systems in some areas (Chaumba et al. 2003; Degeorges & Reilly 2007; Wels 2003; Williams 2011; Wolmer 2005). Elsewhere, in much of tropical rainforest ecosystems populations of many large bodied wildlife species have already declined or were extirpated because of habitat loss and hunting, leaving a fauna consisting predominantly of resilient, rapidly reproducing species (Barnes 2002; Bennett et al. 2007; Harrison 2011; Peres 2000, 2001; Van der Hoeven 2007; Wilkie et al. 2011). Therefore, evaluating the sustainability of hunting is key to the conservation of species exploited for bushmeat (Ling & Milner-Gulland 2006; Milner-Gulland & Akçakaya 2001). Because large body size is correlated with slow breeding, large animals would be more susceptible to extinction under any environmental or anthropogenic impact that targeted slow breeders (Koch & Barnosky 2006).

Although there was an economic collapse in Zimbabwe (Coltart 2008), the country fell back to a subsistence economy, in which there was only limited violence and no refugees, and this may have prevented an increase in illegal hunting over the study period. Furthermore, remittances from those who had migrated outside of Zimbabwe played an important role in the day-to-day survival of local people (Makina 2012) and could also have eased the demand for trade in bushmeat to raise income. Similarly, the emigration of local people living adjacent to the GNP to neighbouring countries, mostly South Africa and Mozambique, to look for employment and/or to commercial farms under the land reform programme could have led to a decline in illegal hunting pressure in the GNP. Elsewhere, in the Central African Republic (Blom et al. 2005), Democratic Republic of Congo (Beyers et al. 2011; Draulans & Van Krunkelsven 2002; Yamagiwa 2003), and Rwanda (Kanyamibwa 1998), human conflicts such as civil wars and economic collapse led to substantial negative impacts on wildlife and conservation, resulting in significant losses of wildlife due to institutional collapse, lawlessness and uncontrolled exploitation of natural resources such as bushmeat.

Our study shows that political instability and economic collapse do not necessarily lead to increased hunting in situations where policy instruments, such as law, are enforced. In addition, increasing law enforcement helped minimise the level of illegal hunting in GNP. Therefore, over an 11-year period (i.e. 2000–2010), our study does not support the first hypothesis that illegal hunting activities would be increased due to economic collapse. However, our

results showed that in the initial phase, i.e. 2000–2003, we did see a reduction in law enforcement and when law enforcement increased in 2004, illegal hunting activities, particularly the number of arrested bushmeat hunters, decreased. These changes in the levels of illegal hunting activities and law enforcement efforts partly supports the second hypothesis that illegal hunting activities would vary with law enforcement efforts. Hence, effective enforcement of wildlife laws is important for the conservation of wildlife resources (Bruner et al. 2001; Holmern et al. 2007; Keane et al. 2008; Rowcliffe et al. 2004). Our study showed that snaring appeared to be one of the common hunting methods in the northern GNP. Snares could therefore be collected more effectively if there is a ranger team specialising in snare search patrols (Wato et al. 2006). Therefore, there is need for the ZPWMA to increase its ranger staffing levels to allow for effective patrolling and policing of the northern GNP to be realised.

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UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

SAFARI CLUB INTERNATIONAL	)	
	)	
Plaintiff,	)	Civ. No. 14-cv-00670(ABJ)
	)	
v.	)	
	)	
SALLY M. R. JEWELL, et al.	)	
	)	
Defendants	)	
	)	

DECLARATION OF JERRY EDGAR BEARDMORE, JR.

I, Jerry Edgar Beardmore, Jr., being first duly sworn on oath, depose and state as follows:

1. I am a resident of Katy, Texas and am employed as a petroleum engineer.

2. I have been a member of Safari Club International for the past 3-4 years.

3. I am also a member of Dallas Safari Club and the National Rifle Association of America.

4. I have a ranch in the Hill Country of Texas where we (myself and my family) participate in Wildlife Management. This includes providing supplemental food and water, habitat improvement, predator control and population management through hunting (white-tailed deer, turkey). Our efforts have yielded significant improvements in buck-doe ratios and the quality of the bucks.

5. I am 46 years old and have been hunting for 38 of those years.

6. I grew up on a farm in Ohio. Our standard routine was to hunt on Saturday mornings (starting with squirrel – first season to open, then rabbit, deer, quail and grouse). By the time I reached 11 years old, I was hunting on my own after school on weekdays.

7. I have hunted in the U.S., Canada and Africa. In the U.S. I have hunted in Ohio, Mississippi, Louisiana, Colorado, New Mexico, Texas, and Alaska for white-tailed and mule deer, caribou, black bear, grizzly bear, elk, moose, axis, blackbuck, feral hogs, scimitar-horned oryx, turkey, quail, dove, grouse, ducks, geese, and sandhill cranes. In Newfoundland, I hunted moose. In the Republic of South Africa, Zimbabwe and Botswana, I hunted for elephant, lion, Cape buffalo, rhino, caracal, eland, kudu, gemsbok, nyala, waterbuck, zebra, wildebeest, impala, warthog, bushbuck, and steenbok.

8. I last hunted in Zimbabwe in 2012 for elephant, Cape buffalo, kudu and waterbuck.

9. I have successfully hunted elephant twice, in Zimbabwe in 2012 and in Botswana in 2013. I imported my elephant from Zimbabwe in 2013.

10. During my elephant hunt in the Omay Concession in Zimbabwe, we encountered many elephants. On many of the days that we were not actively hunting elephants, we also saw cows, calves and both young and mature bulls.

11. I personally witnessed how elephant hunting benefits local communities, combats poaching and increases local tolerance for the species. Due to the arrangement in the Omay Concession, the locals received the trophy fee and all the meat from the elephants taken. As a result, they tolerated the presence of elephants in their fields. Martin Pieters, the outfitter, employed a dedicated anti-poaching team and charged hunters a specific daily rate to support this effort. Most hunters, like myself, contributed funds above and beyond Martin's daily charge to ensure this effort remained staffed and effective. I watched my elephant be reduced to a wet spot on the ground as locals descended on the animal and made use of all the available meat.

12. As recently as mid - 2010, I had no desire to hunt elephant and I couldn't rationalize in my mind why it was appropriate. I decided to research it, however, and in a very short period of time I became obsessed with the idea. The obsession became a reality in April 2012, and I'm more obsessed by it now than ever before.

13. The conservation imperative played a major role in my change of heart. Understanding more about elephant biology and behavior also contributed to my interest in the endeavor. Getting a clearer picture of how a proper elephant hunt is conducted and how challenging and physically demanding it can be, however, really appealed to me. Even with the number of books and DVDs I studied, I still underestimated what an elephant is capable of. The Omay in Zimbabwe is rugged country, and there were days where I would see a pile of elephant dung on an 18" wide trail on the side of a cliff (for lack of a better description) and just shake my head in disbelief that anything the size of an elephant could have passed that way. My bull was not big by any standard, but the hunt was incredible. There is nothing that can compare to walking up and placing your hands on the tusks of an elephant, especially one that has come after many long days and miles.

14. Many of my acquaintances couldn't grasp why I, or anyone else, would hunt an elephant. Since it wasn't that long ago that I felt the same way, I explained how I once felt and why my feelings changed. For some, they were fine once they understood the entire elephant would be utilized, especially the meat for the local villagers. Others were swayed by the overpopulation and habitat destruction (even though the current limited CITES quotas are not going to rectify this issue). With some, the funding for anti-poaching efforts and the animal's value that hunting created for the local population resonated. Surprisingly, many had no issue with the killing of an elephant; they just assumed that the animal was some placid, lumbering creature that you drove up to and shot and there was no sport or

challenge. Once these folks better understood the challenges of a proper hunt, the capability and behavior of an elephant, and the difficultly associated with a lethal shot, most developed a very keen interest in the undertaking.

15. Some of my acquaintances, however, could not justify it in their own minds. They would revert back to "let nature take its course, elephants did just fine long before we got involved." For these folks, I simply explained that those days are gone forever. With a human population knocking on 7 billion, we have forever altered the face of the earth and created an environment where the majestic elephant, once free to migrate thousands of miles as food sources were depleted, are confined to areas that can no longer support a population that grows at a reported 3-5% annually. Allowing "nature to take its course" in these relatively small, isolated sanctuaries will have devastating effects on not only the elephant population, but on all wildlife populations. Well managed and regulated hunting has proven to be a very effective conservation tool around the world, but there will always be the crowd that cannot (or will not) see this.

16. Many consider the hunting of the African elephant to be the greatest hunting adventure in the world. I agree. However, being able to import the successfully hunted elephant from this amazing experience is a significant element and memory of the hunt. The loss of the ability to import a portion of the elephant that was successfully taken and fully used, decreases the value of the hunt for many hunters.

17. The African Elephant is the most challenging, awe-inspiring animal on land. As stated above, I didn't fully appreciate the complexity of this animal, the challenge it presents to a hunter, and the situation that exists in the countries where it is hunted (namely over-population and the resulting habitat destruction). Zimbabwe offers what I consider a classic elephant hunt – miles upon miles of tracking in terrain where tracking is truly an art dominated by locals who can see things I simply cannot. It was the most challenging, rewarding hunting experience of my life – and now my son too wants to participate in this grandest of adventures.

18. Regardless of ones beliefs, we have reached a situation where in many cases, an animal's value plays heavily into its ability to survive. In the case of the elephant, the choice is between regulated, managed hunting and the indiscriminate, illegal ivory trade fueled by the growing Asian economies and centuries of tradition and culture. I have witnessed first-hand the positive impact of legal, well-regulated hunting in Zimbabwe. American sportsmen play a critical role in this endeavor, perhaps the biggest role. If this contribution is removed, the alternative will prevail and the effects will be devastating on the animal I respect and admire the most.

19. I signed a contract with Charlton McCallum Safaris (CMS) for a Bull Elephant hunt in the Dande concession of Zimbabwe (for my son Hunter who will turn 15 the day we arrive in Zimbabwe) in September 2012. Our hunt dates were confirmed to be 17 – 30 June, 2014 (Hunter turns 15 on June 16th). I paid a deposit of $6,160 at the time the contract was signed.

20. On 17 March, 2014 I wired another $21,570 to CMS for the final deposit and for our charter flights. My contract with CMS stipulates no refunds within 6 months of the scheduled date.

21. On the morning of 04 April, I wired $13,000 to Martin Pieters Safaris for a follow-on Hippo hunt on Lake Kariba, and $2,604 to his wife Candy (Nehimba Lodge) for 2 days at Victoria Falls and associated activities following the hippo hunt. While not "elephant related", I certainly wouldn't be flying to Zimbabwe just to hunt a hippo. As with CMS, Martin considers this too late in the game to be refunding money for canceled trips.

22. In addition, I have purchased airfare for my son Hunter and myself (secured long ago), enrollment at the Safari Shooting School for Hunter in January this year, an elephant-capable rifle for Hunter, etc.

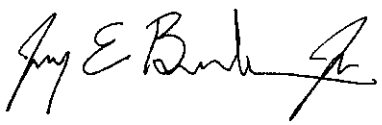
23. Approximately 4 hours after my last wire transfer to my Zimbabwe outfitters, the U.S. FWS announced the elephant importation ban. My 14 year old son, who has been practicing, preparing and studying for 2 years for this adventure cannot understand why he will not be able to import the elephant he potentially takes from a hunt that is perfectly legal and absolutely necessary for the conservation of this incredible animal.

24. Although the government has deprived me and my son of our ability to import our elephant from our hunt, I refuse to seek refunds. I signed a binding contract with CMS, and the recent, irrational decision by U.S. FWS is my cross to bear, not CMS's. CMS has done nothing wrong, and the hunt I paid for is still perfectly legal and absolutely necessary. It is my own government that has jeopardized the long-term survival of the African Elephant. Furthermore, I have a commitment with my son who has been practicing, studying and preparing since 2012. I consider a man's word one of his most important attributes, and I will not compromise mine.

25. I submit this declaration in support of Safari Club International's efforts to challenge the U.S. Fish and Wildlife Service's decision to prohibit the importation of sport-hunted elephant trophies from Zimbabwe and Tanzania in 2014.

In accordance with 28 U.S.C. §1746, I declare under penalty of perjury that the foregoing is true and correct.

Dated this 23rd day of April, 2014, at Katy, Texas.



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Airborne Anti – Poaching Operations Daily Summary
Number 25-11-15(2)

Date: 25 November 2015
Flight Number:
Account: Pro Safaris
Area of operation: Rifa
Pilot: George Mbazima
Copilot/Spotter: Martin Henriksen
Second Spotter: Pro Safaris Johan Carinus
Third Spotter: Pro Safaris Test Jojo
Takeoff Time: 15:59
Landing Time: 16:40

Routing: Chirundu airstrip, Nyangombe Island, Centre road,Pro Safaris (B camp),Sharu River,Escarpment,Rifa/Nyamoumba Airstrip,Zambezi River,Kanyemba Island,Chirundu airstrip

Observations: Old Elephant Carcasses observed at the below co-ordinates.

S16 10 41 E28 53 04 1 Carcass
S16°13’44’ E28°54 13 2 Carcasses

In total Three Elephant carcasses were observed.
Due the recent rain,pans like Mazunga pan(S16 11 20 E28 56 01) have water but no animal activity was observed.

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Flight Tracks

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Airborne Anti – Poaching Operations Daily Summary
Number 26-11-15(1)

Date: 26 November 2015
Flight Number: 1
Account: Afri-Hype/Chirundu Safari Lodge/The Wild Safaris
Area of operation: Chirundu/Nyakasanga
Pilot: George Mbazima
Copilot/Spotter: Martin Henriksen
Second Spotter: CSL Bert Keightly
Third Spoter: National Parks Ranger Victor Mahachi
Takeoff Time: 05:36
Landing Time: 06:29

Routing: Chirundu airfield,Main Chirundu Road(West), Pan (S16 03 11 E28 56 12),Chichuru Pan,Menza Pan,Mangwandi Road,Nyakasanga,Chemutsi,Cross Mana Pools Road,Parallel to Escarpment,Chombo Pan,East of Nyakasanga,Nyakasanga-Zambezi Confluence, Mongwe, Zambezi River,Carl Pisac,Kanyemba Island,Chirundu airfield.

Observations:

- Very little game movement
- Due to recent rains,small pans full
- Impala herd near Chemutsi Photographic area (S16 09 07 E29 10 09)
- Elephant herd close to Chemutsi River (S16 08 29 E29 07 39)
- No evidence of Buffaloes on Kanyemba Island
- As a result of recent rains, Mopani trees starting to form canopies

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Airborne Anti – Poaching Operations Daily Summary
Number 27-11-15(1)

Date: 27 November 2015
Flight Number: 1
Account: Pro Safaris
Area of operation: Rifa
Pilot: George Mbazima
Copilot/Spotter:Martin Henriksen
Second Spotter:Pro Safaris Johan Carinus
Third Spotter:National Parks Ranger Victor Mahachi
Takeoff Time: 05:16
Landing Time: 06:29

Routing: Chirundu Airstrip,Nyangombe Island,Centre Road,Pro Safaris,Sharu River,Parallel Escarpment,Parallel Main Chirundu Road,Nyangombe Island,Rifa Educational Camp,Down Sharu River,Up Chironga River,Track 36 Road,Chirundu Airstrip.

Observations:

- Very little game movement
- Elephant herd spotted at S16 21 18 E028 54 07
- Midstream Dugout canoe at S16 12 07 E28 50 31
- Dugout canoe at S16 20 03 E28 50 07
- 1 Old elephant carcass at S16 19 43 E28 54 35
- 1 Old elephant carcass at S16 09 56 E29 02 12
- Known poacher crossing point S16 10 35 E28 50 21

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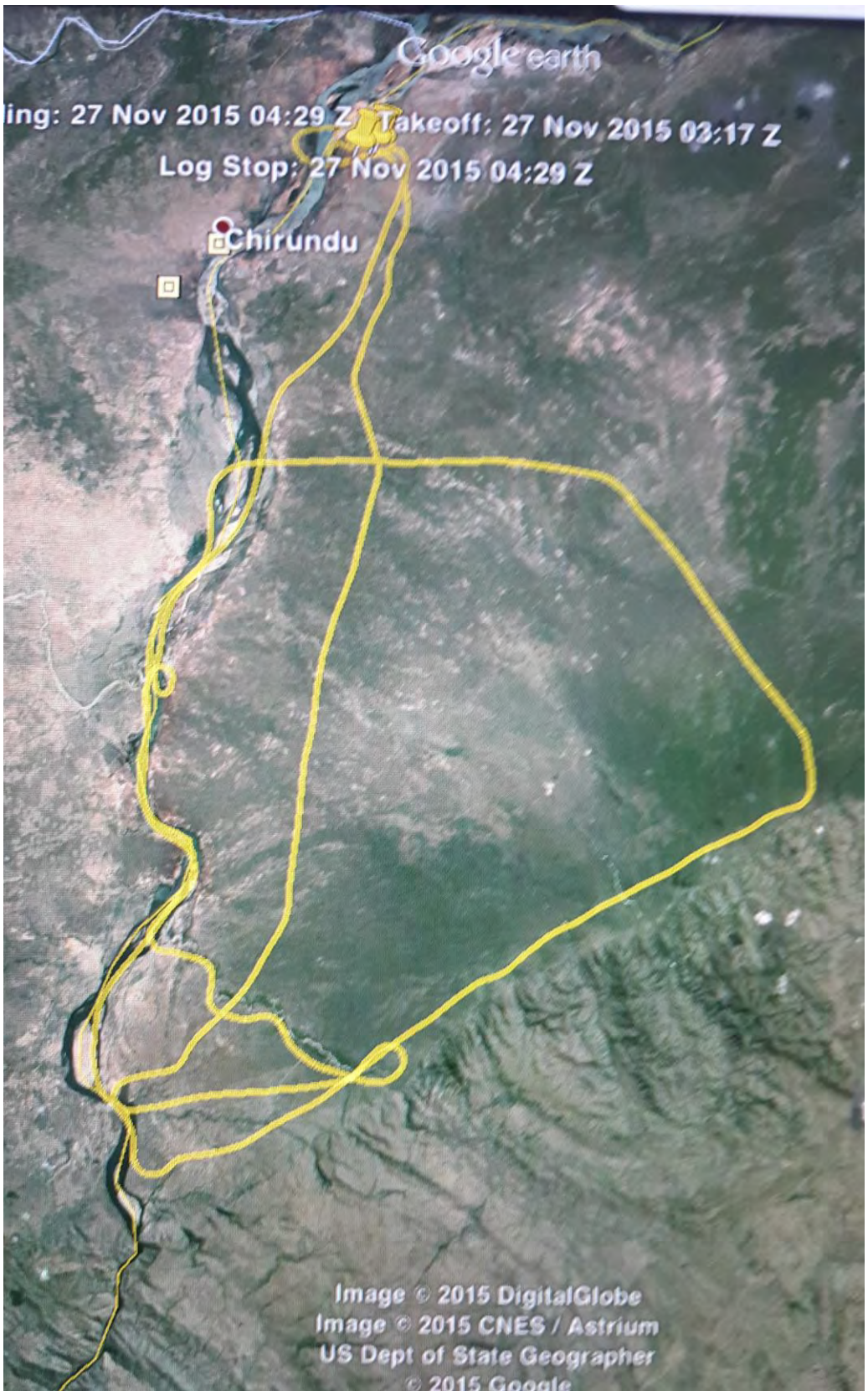

APPEAL TO THE DIRECTOR

Appeal of the Denial of the Applicants'

Request for Reconsideration and

Request for Oral Argument

PRT-04846C and PRT-04205C

CONSERVATION FORCE

CONSERVATION FORCE

A FORCE FOR WILDLIFE CONSERVATION

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June 27, 2017

Acting Director Greg Sheehan
U.S. Fish and Wildlife Service
1849 C Street N.W.
Washington, D.C. 20240

BY EMAIL AND FEDERAL EXPRESS

RE: Appeal of the Denials of PRT-04846C and PRT-04205C and Request for Oral Argument

Dear Director Sheehan:

We respectfully request reversal of the Division of Management Authority's denials of two trophy import permit applications. The first application, PRT-04846C, requested a permit to import an elephant hunting trophy lawfully taken in the Ngamo/Sikumi Forest Block in Zimbabwe on March 21, 2015. The second, PRT-04205C, requested a permit to import an elephant hunting trophy lawfully taken in the Mbire CAMPFIRE District in Zimbabwe on February 25, 2015. Conservation Force represents both applicants as a pro bono, public legal service. Both hunts generated revenue and conservation incentives to enhance the survival of Zimbabwe's elephant. However, both trophy import applications were denied in February 2017.

On April 6, 2017, we submitted a request for reconsideration of these denials, which was also denied in a letter dated May 16, 2017. This second denial relies on a negative enhancement finding made by the DMA on March 26, 2015 (the "Finding"). We turn to you for a final appeal on behalf of the applicants and the well-managed and beneficial hunting system in Zimbabwe, which has the world's second-largest elephant population.

These applications should be approved. The over-three-year suspension of elephant trophy imports from Zimbabwe should be lifted, for three primary reasons. First, it is based on errors and misinterpretation of facts. The DMA suspended imports without notifying or consulting Zimbabwe. Given the lack of contact with Zimbabwe, it is hardly surprising the three negative enhancement findings made in 2014 and 2015[1] are full of mistakes. When these mistakes were corrected by Zimbabwe's wildlife management authority, Conservation Force, and others, the DMA failed to make the changes, raised new "issues," and complained about not receiving information for which it had never asked. But this feint does not change the fact the reasons given for suspending elephant trophy imports from Zimbabwe did not and do not exist.

Second, the regulatory "enhancement" requirement has been satisfied several times over. The benefits of lawful elephant hunting in Zimbabwe were proven in the thousands of pages submitted to the DMA by

[1] Chief, Branch of Permits, *Enhancement Finding for African Elephants Taken as Sport-Hunted Trophies in Zimbabwe during 2014* (Apr. 17, 2014) ("*April Finding*"); Chief, Branch of Permits, *Enhancement Finding for African Elephants Taken as Sport-Hunted Trophies in Zimbabwe during 2014* (July 22, 2014) ("*July Finding*"); Chief, Branch of Permits, *Enhancement Finding for African Elephants Taken as Sport-Hunted Trophies in Zimbabwe on or after January 1, 2015* (Mar. 26, 2015) ("*Finding*").

the Zimbabwe Parks and Wildlife Management Authority ("ZPWMA"), Conservation Force, tourist hunting operators, and others. This information demonstrates tourist hunting revenues justify habitat protection, fund most elephant management and anti-poaching, and increase community tolerance of elephant and other game. The continued suspension of trophy imports obstructs all this. It blocks resources ZPWMA needs to successfully manage the country's 83,000+ elephant. The DMA has redefined "enhancement," and set ZPWMA up to fail the new test by cutting off the support on which ZPWMA relies. This is a "Catch-22" situation.

Third, denial of the applicants' request for reconsideration is arbitrary, capricious, and contradictory. The Finding's mistakes should be updated and corrected. The Finding itself requires this—it promises, at least four times, that the DMA will consider additional information when provided and re-evaluate its negative conclusion.[2] The DMA received such information in July 2015 in response to a May questionnaire sent by the Director of International Affairs almost two months after the Finding was made. Yet, the Finding has not been updated or revised. The denial of the request for reconsideration is wrong. It cannot be based on the best information because the Finding and this denial fail to consider the most up-to-date, complete data requested and received by the DMA.

Therefore, we respectfully appeal the DMA's errors to you, and request oral argument on the appeal.

I. THE SUSPENSION OF ELEPHANT TROPHY IMPORTS FROM ZIMBABWE IS BASED ON ERRONEOUS INFORMATION AND MISINTERPRETATION OF FACT AND HAS BEEN FROM THE VERY BEGINNING

The suspension has been improper from the start. The DMA's negative April Finding cited a "lack of recent data on what is occurring in Zimbabwe" as the "most significant aspect of our analysis."[3] But an asserted lack of data does not justify the suspension because it was due entirely to the DMA's failure to ask. The April Finding admits that prior to the suspension, the DMA had not reached out to ZPWMA in writing since 2007, and ZPWMA provided the requested information at that time. The DMA also met with Zimbabwean representatives "at various times in the past 6 years," but does not claim to have expressed concern about a lack of data during those meetings.[4] To our knowledge, there is no record of a 2007 information request, or any other written request until April 4, 2014.[5]

Rather than consulting with Zimbabwe as recommended by CITES Res. Conf. 11.3, or "provid[ing] … specific actions that can be taken by Zimbabwe … that might allow the Service to reconsider its findings" and "early engagement with the sport-hunting community to maintain positive relations and create opportunity for

[2] E.g., *Finding*, p. 1 & 3 ("The suspension on importation of trophies taken during calendar year 2015 or future hunting seasons could be lifted if additional information on the status and management of elephants in Zimbabwe becomes available…"), p. 6, 11 ("the Service can re-evaluate this finding, and the suspension on importation of trophies taken during calendar year 2015 or future hunting seasons could be lifted, if additional information on the status and management of elephants in Zimbabwe becomes available…").

[3] *April Finding*, p. 6.

[4] *April Finding*, p. 1, 2, 6; *July Finding*, p. 3.

[5] Conservation Force obtained documents in response to a Freedom of Information Act ("FOIA") request for the basis of the April 2014 suspension. That production included the April 4, 2014 questionnaire to ZPWMA, but no others.

cooperative action to affect [*sic*] change," as suggested in an internal memorandum,[6] the DMA suspended the import of elephant trophies without warning. The DMA's failure to engage Zimbabwe or the hunting community, and the resultant errors and omissions in the Findings, are so flagrant as to seem intentional. This conduct suggests an unpublished policy against regulated tourist hunting as a conservation tool.

For example, despite identifying a lack of data as the primary basis for suspending imports, the DMA did not request updated information from Zimbabwe until April 4, 2014—the same day it publicly announced the suspension in a press release.[7] ZPWMA was blindsided and its reaction was immediate. Its Director-General objected in a letter dated April 14 and sent a 32-page response to the questionnaire on April 17, 2014.[8] The Director-General took the initiative to explain the response, answer questions, and meet with FWS representatives in person in D.C.[9] (Note that ZPWMA was equally responsive to the FWS' October 31, 2014 and May 12, 2015 information requests.)[10]

But likely due to the failure to consult ZPWMA and reliance instead upon uninformed, biased sources, each negative enhancement finding has contained numerous errors.[11] And though the DMA received updated, best-available information and corrections, it has barely adjusted its findings and maintained much of the same language—and the same negative conclusion.

The import suspension was based initially on an inexplicable misunderstanding of Zimbabwe's elephant population status and poaching level. According to the April Finding, the IUCN African Elephant Specialist Group's ("AfESG") database showed Zimbabwe's elephant population "had been reduced" from 84,416 in 2007 to 47,366 in 2012; ZPWMA failed to properly monitor or manage these elephant; and a "2013 CITES Panel of Experts" identified weaknesses in ZPWMA's management, funding, and infrastructure. The April Finding also claimed "over 300" elephant were poisoned in Hwange National Park in 2013, and "anecdotal

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[6] CITES Conf. Res. 11.3; Conf. Res. 6.7 (recommending that parties intending to take stricter domestic measures first notify and consult with affected range states); B. Arroyo, *Information Memorandum for the Director* (Jan. 8, 2014), p. 2.

[7] *FWS FOIA Production*, p. 747-51 (T. Van Norman, Letter to E. Chidziya, Director-General of ZPWMA (Apr. 4, 2014)).

[8] ZPWMA, *Response to Questions Raised by the U.S. FWS to Address the USA Endangered Species Act* (Apr. 17, 2017) ("*ZPWMA Apr. 2014 Response*").

[9] Conservation Force, *Comment Opposing the Negative Enhancement Finding for African Elephant Taken as Sport-Hunted Trophies in Zimbabwe in 2014* (Oct. 16, 2014), p. 5 & attachments ("*CF Oct. 2014 Comment*").

[10] E.g., Conservation Force, *Request for Reconsideration of Denial of Permit Applications PRT-04846C and PRT-04205C* (Apr. 6, 207), p. 2-3, 8-10, 13-14 ("*Request for Reconsideration*") ("ZPWMA responded to the first questionnaire within two weeks … ZPWMA responded to the second questionnaire in under six weeks; responded to third—not considered in the Finding—in five weeks; responded to the fourth—not considered in the Finding—in two weeks; and responded to the fifth —not considered in the Finding—within several weeks, with the final plan prioritization completed within six months."); ZPWMA, *Response to the USFWS* (July 2015) ("*ZPWMA July 2015 Response*"); ZPWMA, *Response to the USFWS* (Dec. 10, 2014) ("*ZPWMA Dec. 2014 Response*").

[11] The FOIA production revealed largely dated articles in the record, FWS employees who recommended "unilaterally stop[ping] issuing any permits for any trophies from Zimbabwe immediately," without consulting ZPWMA, and the immediate refutation of the news reports by WWF. One of the most-cited sources in these articles, Johnny Rodrigues of the Zimbabwe Conservation Task Force ("ZCTF"), was shown to have alleged "twisted" and incorrect information, and was unknown to WWF or the Chair of the National Task Force on Poaching and Habitat Loss. See, e.g., *FWS FOIA Production*, p. 162, 176-78.

evidence" indicated that Zimbabwe's elephant population was "under siege."[12] These were all reasons to justify the suspension in the April Finding. And none of these were based in fact. They were factual errors, copied language from the positive, 1997 enhancement finding, or fabrications from anti-hunting sources the FWS knew already to be unreliable.

ZPWMA and Conservation Force submitted extensive information to correct these DMA mistakes. Among other things, we explained how the DMA misinterpreted the AfESG database's data categories to reflect a "reduction."[13] Even the AfESG corrected the DMA's misunderstanding.[14] We also submitted seven surveys dating from the past ten years, including a 2007 aerial estimate of North West Matabeleland/Hwange to correct the April Finding's incorrect opinion that ZPWMA did not monitor the elephant population.[15] The surveys covered over three-fourths of Zimbabwe's estimated elephant range, and were available through a website link to "new" surveys which the DMA apparently did not choose to click.[16]

This information provided showed that ~105 elephants were poisoned in Hwange, not 300, largely due to the quick intervention of ZPWMA rangers and the erly warning and assistance of the neighboring hunting

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[12] *April Finding*, p. 3-6; FWS Division of Public Affairs, *Service Suspends Import of Elephant Trophies from Tanzania and Zimbabwe* (Apr. 4, 2014) ("*Press Release*") ("Anecdotal evidence, such as the widely publicized poisoning last year of 300 elephants in Hwange National Park, suggests that Zimbabwe's elephants are also under siege.").

[13] As we previously explained, "The enhancement finding badly misunderstands the currentness and completeness of the AfESG's '2013 Africa' analysis. That data is updated only through a point in 2012 [as stated in the database], and only to the extent the under-funded volunteers of AfESG are able to review and incorporate 'new' surveys. The AfESG working group's pace is not always consistent or speedy due to funding constraints [discussed by the Chair in a document we attached from the Sixty-Fifth Meeting of the CITES Standing Committee]. Accordingly, there are '251 new surveys' advertised on the main page of the Database (which FWS should have visited to get to the '2013 Africa' report). These surveys 'have not yet been reviewed by the appropriate Data Review Working Group' [page attached] and are not reflected in the database tables. Had FWS clicked the link … it would have counted seven from Zimbabwe on the list. Of the seven, five were completed before 2012. (In fact, 221 of the 246 'new' surveys were conducted prior to 2013 and 185 were conducted prior to 2012, making most of the surveys on this list not very 'new.') Shouldn't FWS be sophisticated enough to understand the database's limitations?" *CF Oct. 2014 Comment*, p. 10-11.

[14] Zimbabwe requested the AfESG comment on the April and July Findings, which was done by email dated May 30, 2014 and a comprehensive letter dated November 3, 2014. The Chair wrote that the July Finding relied on a "serious oversight" in the database—the failure to include the 2007 survey of NW Matabeleland in the country total, although "this survey was listed in the 'New Surveys' portion of the AED website (http://www.elephantdatabase.org/population_submissions/154)." The Chair pointed out "four other instances in which the use of data from the AED presented within the finding's 'Population Status' section demonstrated oversights or misinterpretations as well as a fifth instance meriting clarification." These included: five surveys conducted between 2006-2010 estimated higher populations, contradicting the July Finding's statement that 2006-2010 surveys indicated "a substantial decline in the population"; even if "double-counting" occurred during the Save Valley Conservancy survey the population would still have increased, contradicting the July Finding's criticism; the statement about "a carcass ratio of less than 4%" "suggests a conflation of carcass ratios from aerial surveys and mortality rates," and "4% seems a reasonable figure"; and "sample counts are not inferior to total counts," contradicting the finding's suggestion and "betray[ing] a likely misunderstanding of the relative value of sample v. total counts," among other corrections. *AfESG Letter*, p. 1-4.

[15] Conservation Force, *Comment Opposing the Interim Suspension of Imports of Elephant Trophies from Zimbabwe* (June 6, 2014), p. 4-7 & attachments ("*CF June 2014 Comment*"). We also provided evidence of the monitoring which supplement periodic aerial surveys, including water hole game counts, road strip and walking transects, and ranger-based monitoring. E.g., *ZPWMA Apr. 2014 Response*, p. 6; *CF June 2014 Comment*, p. 4 & attachments; *CF Oct. 2014 Comment*, p. 10-12 & attachments.

[16] *CF Oct. 2014 Comment*, p. 11 & attachments (including website print); *ZPWMA Apr. 2014 Response*, p. 5; *AfESG Letter*, p. 1-2.

operator (an act of enhancement as discussed below). The poachers received deterrent 15-year sentences. In response, ZPWMA initiated a "private sector driven fund raising initiative" and "massive [ranger] recruitment drive" and increased criminal penalties for wildlife poisoning. Moreover, ZPWMA's data indicated poaching was lower in Zimbabwe than most other African countries. Zimbabwe's elephant were not "under siege," but generally stable or increasing.[17]

Moreover, the information proved that the "2013 CITES Panel of Experts" did not exist, and certainly did not query ZPWMA's dedicated elephant management. The 1997 enhancement finding—which approved trophy imports—included almost verbatim language. It seems this language was retained, and somehow edited to "2013," without any fact-checking by the author.[18] These avoidable, perhaps intentional, errors undercut the April Finding's negative conclusion. The DMA's express concerns did not and do not exist.

But instead of admitting its mistakes, the July Finding compounded them. It continued to claim Zimbabwe was suffering from a poaching crisis, lacked updated surveys, and was criticized by a "2002 CITES Panel of Experts." It relied upon outdated CITES/ETIS reports, incorrectly insisted a historical review of elephant management actions was Zimbabwe's elephant management plan, ignored four pages of explanation on quota-setting, and ignored a data-rich report from the CAMPFIRE Association. The "updated" July Finding did little more than entrench the prior finding's errors and omissions.[19]

Once again, Conservation Force tried to rectify these mistakes in a 34-page, substantive comment with 58 attachments. The comment painstakingly went through and fact-checked each section of the July Finding and pointed to information that had been ignored.[20] We emphasized the on-going update to Zimbabwe's

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[17] *ZPWMA Apr. 2014 Response*, p. 5-13; *CF June 2014 Comment*, p. 3-8 & attachments; *CF Oct. 2014 Comment*, p. 18 & attachments; G. Wittmyer et al., *Illegal Killing for Ivory Drives Global Decline in African Elephants*, Proceedings of the National Academy of Sciences (July 22, 2014). Reduced poaching in Zimbabwe was reflected in the Proportion of Illegally Killed Elephant ("PIKE") after 2012. In copying-and-pasting from the April Finding, the July Finding incorrectly stated that 2013 PIKE data was unavailable. But it was, as pointed out by the AfESG and Conservation Force. *AfESG Letter*, p. 4; *CF Oct. 2014 Comment*, p. 21-22 & attachments. Updated 2013 PIKE showed the illegal killing of elephant fell to 0.4 at the Chewore site and 0.22 at the NyamiNyami site, below the "unsustainable" level. CITES Secretariat, SC65 Doc. 42.1 & Inf. 42.1 (data reflected a "statistically significant" decline in poaching); *AfESG Letter*, p. 4-5; see also *ZPWMA July 2015 Response*, p. 25 (providing PIKE 2000-2014).

ZPWMA's July 2015 Response (p. 24-31) reports on "Urgent Measures" undertaken to bring about this reduction; see also *ZPWMA Dec. 2014 Response*, p. 13-14.

[18] *CF June 2014 Comment*, p. 14; compare *April Finding*, p. 3-4, with Chief, Branch of Permits, Enhancement Finding for African Elephants Taken Sport-Hunted Trophies in Zimbabwe (July 2, 1997), p. 3 ("*1997 Finding*").

[19] E.g., *July Finding*, p. 5 (failing to address pledge to update elephant management plan), p. 6 (misinterpreting AfESG database with almost verbatim language to April Finding), p. 6 (dismissing Save Valley Conservancy survey as "partial" and with "double counting"), p. 6-7 (misconstruing carcass ratio in Gonarezhou NP survey), p. 7 (claiming 2012 and 2013 PIKE unavailable), p. 7 (claiming to lack data on ZPWMA's funding), p. 7 (citing "2002 CITES Panel of Experts"), p. 8 (relying upon ivory seizure reports), p. 9 (complaining to lack offtakes figures), p. 10 (conflating human-elephant conflict with PAC offtake), p. 10 (raising a red herring of the CITES approved trade in hides), p. 10-11 (dictating what factors ZPWMA must consider in quota-setting), p. 11-12 (failing to discuss the CAMPFIRE Association Report).

[20] E.g., *CF Oct. 2014 Comment*, p. 8, 15-16 (explaining how *Elephant Management in Zimbabwe* was not a management plan and quote referred to maintaining trophy quality, not sustainability), p. 10-11 (correcting misinterpretation of AfESG database and existence of "new surveys"), p. 11-12 (noting additional surveys provided which refuted claims that "very few new surveys" had been conducted, Hwange had not been surveyed, and surveys showed downward trend), p. 13 (demonstrating that SVC survey was comparable to prior and "double-counting," if it even occurred, had minimal effect), p. 13-14 (correcting misreading of GNP survey report and omission of sentence in quote), p. 16-17

elephant management action plan that was largely omitted in the July Finding (although the DMA was kept informed of the process) and the 2014 aerial survey being planned with Zimbabwe's transfrontier partners to be comparable with past surveys, among (many) other things.[21]

However, the Finding still does not adequately consider these corrections and submitted data. As detailed in the Request for Reconsideration, the Finding repeatedly copies-and-pastes from the July Finding. (At least half the substantive paragraphs contain similar, sometimes verbatim language to the July Finding). The Finding fails to incorporate significant information submitted by ZPWMA or Conservation Force. Some of the errors made are fundamental.

For example, as in July, the Finding does not consider four of the seven recent elephant surveys provided, and cherry-picked from the two surveys it cited (and was corrected by the AfESG).[22] As in July, the Finding purportedly quotes from a "CITES Panel of Experts" that did not exist.[23] As in July, the Finding dismisses what it labels as "bright spots of conservation" as being "not enough," and criticizes Zimbabwe's lack of a "government mechanism" to encourage conservation. But Zimbabwe was the first African country to give "Appropriate Authority" to local communal land holders to manage and benefit from wildlife on their land. That authority is <u>exactly</u> the mechanism which incentivizes the existence of populations of elephant, lion, leopard, and other dangerous game that otherwise would not exist (see p. 11 below).[24] At the turn of the twentieth century, the elephant population in Zimbabwe was estimated to be fewer than 5,000. Now, thanks in part to the "bright spots" of hunter conservation and largely to the devolution of management authority, elephant populations are stable or increasing.[25] They are also sustainably hunted, as explained

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(explaining why 2014 national survey did not require cameras and comparability was main goal), p. 20-21 (proving "2002" CITES Panel of Experts did not exist), p. 21-22 (providing 2012 and 2013 PIKE data (which had been available in July)), p. 22 (explaining that ETIS data is "confounded" by some CITES-authorized, lawful trade in ivory in Zimbabwe that is subject to seizure abroad), p. 25-26 (justifying quota-setting process), p. 26-28 (noting omission of CAMPFIRE Association Report data), Appendix I (quoting April 4 inquiry and claimed lack of data to demonstrate that data was not requested).

[21] *CF Oct. 2014 Comment*, p. 9, 16-17, & attachments; *AfESG Letter*, p. 4-5. Please note that the DMA received the report of the national Elephant Management Plan Workshop in December 2014, and was sent invitations, agendas, and proceedings of the regional elephant management planning workshops as these were issued.

[22] *AfESG Letter*, p. 2-5 (correcting errors with paragraphs on Save Valley Conservancy and Gonarezhou surveys); CF Oct. 2014 Comment, p. 10-14.

[23] The Finding cannot possibly quote the Panel of Experts' report, which was clearly not reviewed, because the author still cannot get the correct date for the Panel after three tries. The author first chose 2013, then cut off a decade in the July Finding. Perhaps he or she considered 1997 to be a safe bet because Zimbabwe's elephant population was down-listed from Appendix I to Appendix II of CITES in 1997. However, that down-listing was in the works for several CoPs, and Zimbabwe's elephant status and management were reviewed by the CITES Panel of Experts in 1992. CITES Res. Conf. 7.9; Zimbabwe, *Consideration of Proposals for Amendment of Appendices I and II* (Prop. 10.27); CITES Panel of Experts, *Review of the Proposals Submitted by Botswana, Namibia, and Zimbabwe to Transfer Their National Populations of Loxodonta africana* (1992). Please note that even if the Finding intends to cite this Panel, their report is <u>twenty-five years old</u>.

[24] *CF Oct. 2014 Comment*, p. 27-30; *Request for Reconsideration*, p. 16-18. The Finding (p. 10) criticizes ZPWMA due to the commitment of hunting operators to provide enhancement. That should not be a criticism. It is a <u>benefit</u> to the elephant and other species. It represents the devolution of anti-poaching and community support obligations to the private sector, relieving some of the financial burden on ZPWMA. Accord *ZPWMA Apr. 2014 Response*, p. 14-16, 27-28; *ZPWMA Dec. 2014 Response*, p. 4, 17-20, 25-26; *ZPWMA July 2015 Response*, p. 14, 31-33.

[25] ZPWMA, *Zimbabwe National Elephant Management Plan (2015-2020)*, p. 3-11 ("*Plan*").

in three ZPWMA Responses and the non-detriment determination.[26] The participatory, locally allocated quotas represent a fraction (0.37% in 2014 and 0.49% in 2016) of the elephant population, and offtakes are even lower—0.23% on average (2010-2015).[27]

Rather than accepting the evidence of enhancement and sustainability, the Finding, as in July, twists facts, ignores relevant data, claims not to have information, and does everything it can to justify the negative conclusion in light of everything that points to a positive finding of enhancement. The DMA then tacitly admitted it had not requested information it claimed not to have when it sent a May 2015 questionnaire to ZPWMA.[28]

The concerns on which the trophy import suspension was based have been proven baseless. Zimbabwe's elephant management and tourist hunting system have been proven to benefit the species. If all of the submissions by ZPWMA, Conservation Force, and others are reviewed without a preconceived conclusion, then that best-available and most current information requires the suspension to be lifted. An unbiased and open-minded review is what we request by this appeal.

II. THE SUSPENSION OBSTRUCTS THE ENHANCEMENT GENERATED BY LAWFUL TOURIST HUNTING

During the last 38 months and counting, ZPWMA, Conservation Force, and others have provided far more than enough information to demonstrate that the "enhancement" standard is satisfied. Far more than in prior enhancement findings. This information reflects "activities that provide a direct or indirect benefit to the species in the wild."[29] Tourist hunting benefits elephant by creating incentives for habitat protection and expansion, operating funding for ZPWMA, funding for anti-poaching and "boots on the ground," rural community employment and investment, and much more. This is not an empty claim. It is borne out in the extensive documentation submitted.

A. Expansion and Protection of Habitat and Sustainable Funding

Tourist hunting enhances the survival of elephants in Zimbabwe by justifying protection of two-and-a-half times more habitat than in strictly-protected national parks. Although the ~28,000 km^2 in national parks contribute greatly to wildlife conservation, the parks are much smaller than the approximately 19,000 km^2 in safari areas, 40,000 km^2 in communal/CAMPFIRE areas, and over 7,100 km^2 in private conservancies.[30]

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[26] *ZPWMA Apr. 2014 Response*, p. 19-26; *ZPWMA Dec. 2014 Response*, p. 22-25; *ZPWMA July 2015 Response*, p. 43-48; ZPWMA, *Non-Detriment Finding for African Elephant in Zimbabwe* (May 16, 2014); *Request for Reconsideration*, p. 10-11.

[27] *ZPWMA July 2015 Response*, p. 43 (average offtake of <192 elephant per year), 44 (quota less than 300 in 2014), 46 (2016 quota).

[28] B. Arroyo, *Letter to Minister Kasukuwere* (May 12, 2015); .

[29] C. Hoover, *Letter to Applicant PRT-04846C* (May 16, 2017), p. 1 ¶ 2.

[30] IUCN, World Database on Protected Areas, publicly available at http://www.protectedplanet.net; CAMPFIRE Assn., *Trophy Imports Suspension and the CAMPFIRE Program* (2014), p. 1-2 ("*CAMPFIRE Association Report*"); *Request for Reconsideration*, p. 17 (citing B. du Preez et al., *Sport-Hunting and Lion (Panthera leo) Conservation in Zimbabwe* (Jan. 31, 2016); B. du Preez, *Bubye Valley Conservancy Lion Research Report* (Jan. 12, 2016) ("*BVC Report*"); R. Groom, *Hunting in Zimbabwe's Save Valley Conservancy* (Jan. 27, 2013).

Note, this estimate does not include all communal areas, but only nine significant hunting areas. It does not include all conservancies (most specifically, the 1,400 km^2 Nuanetsi area or the Gwayi Valley). And it does not include the

The revenue from lawful hunting sustains this expanded habitat. It is obviously an incentive in safari areas, but also in CAMPFIRE areas (prior to the suspension), hunting generated ~90% of all revenue, and elephant hunting generated three-quarters of this total.[31] In private conservancies such as Bubye and Savé Valley, operations, anti-poaching, and community programs are exclusively supported by hunting income.[32]

Hunting revenue also provides most of the operating budget on which ZPWMA relies to secure this habitat and police the national parks.[33] Conservation fees charged to hunting clients and others, and hunting fees charged for concession leases, licenses, and trophies, are the primary source of ZPWMA's funds. Elephant hunting fees account for the largest percent of revenue generated across all user-pay land categories (e.g., safari areas, communal land, private conservancies, and forestry concessions). In 2014, over $6 million in trophy fee revenue derived from elephant hunts. Approximately $5 million accrued to ZPWMA and was "ploughed back into conservation," law enforcement, and management.[34] Over 50% of the revenue had come from U.S. hunters prior to the suspension.[35]

According to ZPWMA's Elephant Coordinator: "the African elephant is one of the biggest drawcard species from a hunting perspective and is at the centre of all the major hunts … Generally hunting contributed an average of USD22m to the GDP in 2014 and 2015..."[36] Most of the revenue from elephant hunting is re-invested in and contributes to the recovery of the species by being used for law enforcement and anti-poaching.[37] Without this revenue, ZPWMA is hard-pressed to implement its state-of-the-art national and regional elephant management plans. The trophy import suspension reduced, and continues to reduce, this much-needed revenue.[38]

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forest reserves that allow sustainable hunting, such as those in the Matetsi/Kazuma Pan area. The habitat provided and protected in hunting areas is even larger than stated above.

[31] *CAMPFIRE Association Report*, p. 4; CAMPFIRE Assn., *CAMPFIRE Hunting Income and Distribution* (Dec. 1, 2015), p. 6 ("*CAMPFIRE Income Analysis*").

[32] Conservation Imperative, *Fate of the African Lion: Bubye Valley Conservancy* (sent to the DMA on Feb. 24, 2016).

[33] *ZPWMA Apr. 2014 Response*, p. 16, 25, 27; *ZPWMA Dec. 2014 Response*, p. 20-21; *ZPWMA July 2015 Response*, p. 48-53 & attachments; ZPWMA Email to DMA forwarding *Zimbabwe National Elephant Supplementary Management Plan (2015-2010)* (Nov. 9, 2016) ("*Plan Supplement*"); *CF Oct. 2014 Comment*, p. 30-31 & attachments.

[34] *ZPWMA Apr. 2014 Response*, p. 25; *CF June 2014 Comment*, p. 17 (CAMPFIRE revenue is also "ploughed back into wildlife conservation activities in CAMPFIRE areas. Proceeds are used directly for elephant conservation, provision of game water supplies, wildlife monitoring and anti-poaching programs on communal land").

[35] *ZPWMA July 2015 Response*, p. 40-41; *CAMPFIRE Association Report*, p. 4; *CAMPFIRE Income Analysis*, p. 6; ZPWMA, *Legal Trade, Conservation, and Rural Livelihoods: A Zimbabwean Perspective* (Dec. 2016), p. 19; SOAZ, *Status of Elephant Populations, Hunting, and Anti-Poaching Effort in Safari Areas in Zimbabwe* (2014), p. 3-4 ("*SOAZ Report*").

[36] ZPWMA, *Legal Trade, Conservation, and Rural Livelihoods* (Dec. 2016), p. 9-10.

[37] *ZPWMA July 2015 Response*, p. 36-41, 48-51; ZPWMA, *Legal Trade, Conservation, and Rural Livelihoods* (Dec. 2016), p. 9-10. Salaries and ranger equipment are the largest budget items, and most rangers are used for patrols that conduct monitoring and protection/enforcement. *ZPWMA July 2015 Response*, p. 34-36.

[38] See generally *Plan*; *Plan Supplement*, p. 6 ("One of the major challenges regarding implementation of the EMP is with regards to the adoption of stricter domestic measures by the United States of America. This has had the net effect of further reducing the revenue from hunting into the Authority, which therefore affects the budget allocated to resource protection, in particular the elephant in this case. One of the key impediments towards and full and comprehensive implementation of the Elephant Management Plan is limited resources."); CAMPFIRE Assn., *The Role of Trophy Hunting of Elephant in Support of the Zimbabwe CAMPFIRE Program* (Dec. 2016), p. 1, 22-25 ("*CAMPFIRE—Role of Hunting Report*"), publicly available at http://campfirezimbabwe.org/index.php/downloads.

B. Anti-Poaching and Encroachment

Lawful tourist safari hunting enhances the survival of elephant by being a key component of Zimbabwe's national anti-poaching strategy.[39] Hunting operators are often the first to observe poaching and the first line of defense against poachers because concessions frequently buffer national parks and international borders. The DMA was provided extensive documentation to evidence this enhancement, yet somehow misinterprets this evidence as a negative.

The Hwange National Park poisoning referenced in the April Finding and press release was first discovered by a hunting company's team of anti-poaching scouts. The scouts initially tracked the poachers, and the operator and team worked closely with ZPWMA rangers to minimize the damage.[40] This is a clear example of how hunting operators in the field[41] benefit elephant. Their presence adds to the capacity to police a park like Hwange, 1.6 times the size of Yellowstone National Park. Hunting operators' anti-poaching teams add a significant number of "boots on the ground." According to SOAZ, a sample of just fourteen operators invested almost $1 million in anti-poaching in 2013, including salaries for 245 scouts.[42] (The DMA received this data, but has never discussed or cited it in the Findings.)

Conservation Force submitted specific examples to further demonstrate the operators' commitments and contributions. One operator in an area bordering Mozambique "picked up over 5,000 snares and arrested over 60 poachers (in four years)," with an annual anti-poaching expenditure of $80,000 to $90,000. The scouts have grown so skilled in anti-poaching that they work with ZPWMA rangers to patrol Mana Pools National Park, in addition to patrolling the concession. The operator spent over $95,000 on anti-poaching activities in 2016 alone, and more in community payments (as discussed in the next section).[43]

Similarly, a hunting operator discovered the Hwange poisoning because the company's twelve-person anti-poaching team patrols the park's edge. This is an inherent benefit of tourist hunting. The company's anti-poaching and community programs exceeded $350,000 in 2014. Ninety-five percent of the company's revenue derived from elephant hunting prior to the trophy import suspension.[44]

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[39] *ZPWMA Apr. 2014 Response*, p. 26-28; *ZPWMA Dec. 2014 Response*, p. 17; *ZPWMA July 2015 Response*, p. 27, 33-34.

[40] *CF June 2014 Comment*, p. 4, 18-19 (attaching email and declaration from operator involved).

[41] The Finding, p. 10, misconstrues this as hunting clients ("armed hunters"). But our submissions have never claimed hunting **clients** contribute to anti-poaching. Rather, the extensive operator patrols protect the habitat and provide the key enhancement. E.g., *CF June 2014 Comment*, p. 4, 17-19 & attachments; CF Oct. 2014 Comment, p. 22, 27-33 & attachments; *Request for Reconsideration*, p. 12-13, 16-18 & attachments (e.g., examples of Charlton McCallum Safaris, Lodzi Hunters, Pro Safaris, Martin Pieters Safaris, etc.); *SOAZ Report*, p. 4.

[42] *SOAZ Report*, p. 4.

[43] Information for Charlton McCallum Safaris submitted in: *CF June 2014 Comment*, p. 16,18-19 & attachments; *CF Oct. 2014 Comment*, p. 27-30 & attachments; Conservation Force, *Supplementary Comment Opposing [July] Finding and Information Provided in Support of a Positive Enhancement Finding for 2015* (Dec. 15, 2014) p. 3-6 & attachments ("*CF Dec. 2014 Comment*"); CF, *Supporting Documentation for Comments Demonstrating Enhancement from Tourist Hunting in Zimbabwe* (Jan. 19, 2015), p. 1-4 & attachments ("*CF Jan. 2015 Comment*"); *Request for Reconsideration*, p. 12 (citing emails sent to the DMA attaching Charlton McCallum Safaris documents).

[44] Information for Lodzi Hunters: *CF Dec. 2014 Comment*, p. 3-6 & attachments; *CF Jan. 2015 Comment*, p. 1-4 & attachments; *Request for Reconsideration*, p. 13 & attachments.

Another hunting operator along the Zambian border invests over six percent of turnover in a ten-member anti-poaching team, and coordinates with ZPWMA rangers to police the over 500 km^2 concession (a little smaller than Zion National Park).[45] In 2013-2014, anti-poaching teams in the Omay communal area (which forms a corridor with several safari areas and national parks) conducted 289 patrols, recovered 165 snares, and arrested 123 poachers.[46]

The revenue from tourist hunting, and especially elephant hunting, underwrites anti-poaching programs throughout Zimbabwe. In the national parks, hunting operators work with and support ZPWMA rangers.[47] Their contributions do not "raise … concerns about the effectiveness of funds utilization" by ZPWMA,[48] but benefit the elephant and other wildlife by sharing law enforcement costs with the private sector, reducing the government burden. This is a customary and widely-recognized "enhancement" of regulated hunting in Zimbabwe and throughout Southern and Eastern Africa. As we previously explained:

> The examples … are not just "bright spots," as dismissed in the [July] finding … they form a steady beam of light that shines on Zimbabwe's elephant. These examples represent a consistent commitment throughout the safari community in Zimbabwe, and a shared goal of ensuring the conservation of elephant and other wildlife. That is … enhancement.[49]

And that enhancement is being reduced and threatened by the denial of these import permits.

C. CAMPFIRE/Reduction of Human-Elephant Conflicts

Zimbabwe was the first African country to devolve control over natural resources to the local communities living on that land. CAMPFIRE's innovation was to give communities a proprietary interest in the resource, including wildlife.[50] CAMPFIRE communities rely upon lawful tourist hunting to generate revenues, which are used for building schools and clinics, improving water supplies, paying school fees or pensions, shoring up food supplies, and more.[51] Benefits for rural communities are multiplied in jobs, gratuities, game meat, and other financial opportunities much valued in a country with high unemployment and poverty rates.[52]

Before the suspension of elephant trophy imports, approximately 90% of CAMPFIRE revenue derived from hunting concessions. The revenue is split among wards, rural district councils, and the national CAMPFIRE Association, with 55% of funds directed to ward bank accounts, and 26% of funds invested in community projects.[53] Elephant hunting was the financial backbone of CAMPFIRE. Over 70% of the revenue derived

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[45] *Request for Reconsideration*, p. 17 & attachments (Pro Safaris Report).

[46] *Request for Reconsideration*, p. 17 & attachments (Martin Pieters Safaris Reports).

[47] *CF June 2014 Comment*, p. 4, 18; *CF Oct. 2014 Comment*, p. 22, 28-30.

[48] *Finding*, p. 10.

[49] *CF Oct. 2014 Comment*, p. 33 (citing *CF June 2014 Comment*, p. 17-19).

[50] *CAMPFIRE—Role of Hunting Report*, p. 2-3.

[51] From 1986-2006, CAMPFIRE channeled more than $20 million to rural villages and $17 million to RDCs. *CAMPFIRE Association Report*, p. 3-4, 8.

[52] *CAMPFIRE Association Report*, p. 3-4, 7-11; *CAMPFIRE—Role of Hunting*, Annex 1; *ZPWMA Apr. 2014 Response*, 24-28 *CF June 2014 Comment*, p. 15-17 & attachments; *CF Oct. 2014 Comment*, p. 26-27, 30-33.

[53] Relying on outdated information, the July Finding (p. 11) and Finding (p. 18) each criticize distribution of CAMPFIRE revenues, but generally that has not been an issue in the last decade, since the CAMPFIRE Constitution and revenue-sharing guidelines were revised. It is "NOT about noncompliance in disbursement of revenue to communities. It is the quality of services provided by RDCs to communities, e.g. anti-poaching, problem animal control, hunting

from elephant hunting. This exceeded $1.7 million in 2012.[54] Over 53-66% of clients were U.S. citizens, and from 2010-2015, over $5 million was generated for CAMPFIRE communities from elephant hunts by U.S. hunters.[55] However, that number has fallen since 2014.[56]

The grant of Appropriate Authority means ZPWMA foregoes the hunting fees in CAMPFIRE areas. Fees and other benefits accrue directly to the communities. CAMPFIRE communities also benefit from contracts or joint ventures with hunting operators. Conservation Force submitted specific examples of community-operator arrangements which have reduced poaching and human-wildlife conflicts. In the Mbire District where applicant PRT-04205C hunted, the operator and community maintain a "genuine joint venture." In 2013 to 2015, the operator paid over $1 million to local wards.[57] Ninety percent of this income came from hunting, 90% of clients were U.S. citizens, and over one-third of the revenue derived from elephant hunts by U.S. citizens.[58]

Likewise, under contract with the Tsholotsho district council, one operator has paid over $530,000 to the community in the same period. Over $318,000 was deposited in ward bank accounts. The operator assists with village projects on top of these payments.[59]

These are two of the many examples of livelihood improvements related to tourist hunting, with reduced encroachment and conflict as the intended results. The continued suspension of elephant trophy imports, however, obstructs the benefits generated for local communities and reverses the tolerance gains.[60] The CAMPFIRE Association wrote four reports that have been submitted to the DMA, including the CAMPFIRE Workshop report, to raise the alarm about the suspension's detrimental impact. Yet CAMPFIRE's concerns and supporting statistics have not been credited or even discussed in the Findings.

The positive, 1997 enhancement finding cited CAMPFIRE as the means Zimbabwe used to mitigate human-elephant conflict.[61] In the past, the FWS consistently supported CAMPFIRE. CAMPFIRE was considered "an excellent example of a social program built on values obtained from the sustainable utilization of wildlife resources" and "an important political-economic-sociological institution that developed an environmental ethic, restored the perception of wildlife as a valuable resource, advocated wildlife management … and encouraged the conservation of natural ecosystems and wildlife habitats on tribal lands."[62]

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administration, that often creates tension." *CF Oct. 2014 Comment*, p. 31-32 (quoting C. Jonga (Sept. 30, 2014)). The Finding quotes a portion of this email, but still reaches the opposite conclusion.

[54] *CAMPFIRE Association Report*, p. 4; *CAMPFIRE Income Analysis*.

[55] From 2010 to 2015, hunting fees accounted for over $11 million, 70% from elephant hunting and 66% from U.S. hunters. *CAMPFIRE Association Report*, p. 3-4, 8; *CAMPFIRE Income Analysis*, p. 1, 6; *CAMPFIRE—Role of Hunting*, p. 9-11.

[56] *CAMPFIRE—Role of Hunting Report*, p. 22-23.

[57] *Request for Reconsideration*, p. 15 (citing Chief Sen. D. Chisunga, *Land Use Planning at the Local Level*, Presentation at the 14th African Wildlife Consultative Forum (Nov. 10, 2015)); *CF Oct. 2014 Comment*, p. 29 & attachments.

[58] Please see note 43.

[59] Please see note 45.

[60] *CAMPFIRE—Role of Hunting Report*, p. ii.

[61] *1997 Finding*, p. 2.

[62] 57 FR 35473-01, 35480, 35484 (Aug. 10, 1992), 1992 WL 188531(F.R).

In Zimbabwe, CAMPFIRE remains the primary way rural communities benefit from the sustainable use of wildlife. The DMA's failure to consider CAMPFIRE's enhancement or damage caused by the suspension is irresponsible and detrimental to the elephant.[63] CAMPFIRE's concerns, and the suspension's impact, have recently been corroborated by an independent paper concluding that tourist hunting is important to both wildlife conservation and rural development in Zimbabwe.[64]

D. Summary of Proven Enhancement

These direct and indirect benefits have been documented.[65] Every hectare of habitat secured, every dollar generated for management and enforcement, every snare picked up, every elephant spared based on the value of a hunting fee **is enhancement**. This satisfies the "special rule" self-imposed by the FWS.[66]

Unfortunately, the DMA has chosen to obstruct this enhancement. It admits "some benefits are shown." But it has repeatedly raised the bar. Instead of requiring hunting enhance the survival of the species, the DMA apparently requires the hunting "ensure" or "guarantee" the species' survival. But neither the ESA nor the special rule uses those words. Nor does the ESA or special rule mention detailed financial break-downs, changes to a country's accounting, tracking of every dollar spent by a U.S. citizen, or a completely flawless system. The DMA has invented a standard far higher than enhancement, perhaps to legitimize its original mistake in suspending imports of lawful elephant trophies and justify continued suspension. These decisions have seemed to be pre-made and based on a political imperative, not the reality of elephant in Zimbabwe or the ESA's legal requirements.

III. DENIAL OF THE REQUEST FOR RECONSIDERATION IS BASELESS AND CONTRADICTORY

Denial of the request for reconsideration is error. Like the enhancement Findings, the DMA's denial letter is based on misconceptions. The letter claims, "[at] the time you originally applied for a permit, the Service had reviewed the best available scientific and management data…"[67] But that is impossible. The Finding dates to 2015. These applications were filed in 2016. (Until then, no permit application was even required for CITES Appendix II-listed, ESA-threatened-listed elephant imports.[68]) Within its first three paragraphs, the denial misrepresents the facts.

Moreover, the best-available information for 2015 was not considered in the Finding, which copies-and-pastes most of the July Finding and fails to engage with most of the data submitted by Conservation Force. How can a finding purport to rely upon the best-available and most up-to-date information, when so much is repeated and so little new and additional information is incorporated?[69] Moreover, the DMA was aware that it had not asked for all the information it claimed not to have, as shown in the May 12, 2015 request

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[63] *CAMPFIRE—Role of Hunting Report*, p. ii, 22-25.

[64] V.K. Muposhi et al., *Trophy Hunting, Conservation, and Rural Development in Zimbabwe: Issues, Options, and Implications*, International Journal of Biodiversity (2016), publicly available at https://www.hindawi.com/journals/ijbd/ 2016/8763980/.

[65] Please see the Index to the Request for Reconsideration.

[66] 50 C.F.R. § 17.40(e)(6)(B).

[67] C. Hoover, *Letter to Applicant PRT-04846C* (May 16, 2017), p. 1 ¶ 3.

[68] 50 C.F.R. § 17.40(e), revised by 81 Fed. Reg. 36388 (June 6, 2016).

[69] See generally *Request for Reconsideration*.

for information sent to ZPWMA.[70] ZPWMA's July 2015 Response has not been discussed in any finding or otherwise considered, even though it provides information relevant to 2015 and before, and fills in alleged information gaps. Denial of the request for reconsideration is improper because the Finding should have been updated, in keeping with its own terms, to consider this 2015 response.[71]

Last, although the denial draws a line at March 26, 2015, there is no magic date by which a finding must be made. We have DMA enhancement findings dated in March, April, July, October, and December, and there are undoubtedly findings made in other months for other species.[72] It is arbitrary, capricious, and unfair to stand on a March finding when the DMA knew Zimbabwe was updating its elephant management plan and taking other steps to satisfy the DMA's own critiques and to cut off Zimbabwe's year-long hunting season after three months.[73] This line need not be drawn, and should be reversed.

CONCLUSION

More than sufficient information has been provided to override the anecdotal information cited as grounds to support the April 2014 suspension of elephant trophy imports. Enhancement has been shown, and the DMA's mistakes in the April, July, and March findings have been corrected in the submissions by ZPWMA, Conservation Force, and others. However, the DMA has not considered a great deal of that information submitted, to the detriment of the elephant, CAMPFIRE communities, and well-managed tourist hunting system in Zimbabwe.

Reversal of the over-long suspension is urgently due. In constantly re-defining "enhancement," the DMA has blocked the very benefits it purports to require for elephant and other species. Zimbabwe's elephant management strategy largely depends upon the revenues and incentives that come from a limited hunting offtake and trade. We remain concerned that little reason remains for Zimbabwe to maintain such a large and costly elephant population, when the incentive of U.S. hunters has been blocked by the U.S. FWS. The continued suspension of elephant trophy imports is itself the greatest threat to Zimbabwe's elephant.

The best-available information demonstrates that the suspension was a mistake from inception based on anecdote and misinformation. The best-available information demonstrates that lawful hunting fulfills its promise in Zimbabwe—it secures the most habitat, pays for management and anti-poaching, and improves human tolerance of elephant and other dangerous game. Because the enhancement standard is met, the continued suspension of elephant trophy imports is arbitrary, capricious, and unlawful.

Last, the best-available information demonstrates that denial of applicants' request for reconsideration was also in error. The March 25, 2016 enhancement finding is not updated. Its arbitrary time frame should be rejected. When the best-available information is properly considered, the import of elephant hunting trophies from 2015 and beyond should be approved. When the dependent conservation program of the elephant is considered, the permits should be approved.

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[70] B. Arroyo, *Letter to Minister Kasukuwere* (May 12, 2015); *ZPWMA July 2015 Response*.

[71] E.g., *March Finding*, p. 1, 3, 6, 11.

[72] The DMA made a positive enhancement finding for the import of sport-hunted elephant trophies from Zambia in December 2012, and a positive enhancement finding for the import of wild and wild-managed lion hunting trophies from South Africa in October 2016.

[73] The DMA apparently has not denied import permit applications for hunts occurring later in 2015, as we are aware of an applicant who hunted an elephant in Zimbabwe on May 5, 2015 who has not received a denial letter.

Accordingly, we respectfully request that you reverse the denial of these permit applications and order the DMA to issue these permits.

On behalf of the applicants, we respectfully request oral argument on this appeal. We ask that you provide a contact for scheduling or contact our office to schedule this argument.

Respectfully submitted,

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CC: Craig Hoover

Attachments:

- Chart of Key Documents and Quotations
- Copy of Request for Reconsideration and Index of Attachments
- Copy of letter denying Request for Reconsideration
- March 25, 2016 negative Enhancement Finding

ATTACHMENT

Request for Reconsideration

CONSERVATION FORCE

A FORCE FOR WILDLIFE CONSERVATION

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April 6, 2017

Chief Tim Van Norman
Branch of Permits, Division of Management Authority
U.S. Fish and Wildlife Service, MS: IA
5275 Leesburg Pike
Falls Church, Virginia 22041

BY EMAIL AND FEDERAL EXPRESS

Re: Request for Reconsideration of Denial of Permit Applications PRT-04846C and PRT-04205C

Dear Chief Van Norman:

We request reconsideration of the denials of two applications for permits to import hunting trophies of elephant taken in Zimbabwe in 2015 ("Denials"). The first application was submitted by Richard Bonander, PRT-04846C, for a bull elephant taken in the Ngamo/Sikumi Forest Block in Zimbabwe on March 21, 2015. The second was submitted by Michael Jines, PRT-04205C, for a bull elephant taken in the Mbire CAMPFIRE District in Zimbabwe on February 25, 2015. Conservation Force represents both Applicants.

The Denials should be reconsidered and reversed for eight primary reasons. First, they rely upon the *Enhancement Finding for African Elephant Taken as Sport-Hunted Trophies in Zimbabwe on or after January 1, 2015*, dated March 26, 2015 ("Finding"). But the Finding fails to consider significant information submitted by Conservation Force, Zimbabwe's Parks and Wildlife Management Authority ("ZPWMA"), and others. If considered, the negative conclusion would have to be reversed. The information provided:

- Establishes that Zimbabwe has the most up-to-date management plan for African elephant in the world, with adaptive and regionally-specific action items, clear assignment of responsibilities, and means of verifying its implementation successes;
- Establishes that Zimbabwe has a relatively stable elephant population, as determined by a recent countrywide survey;
- Demonstrates that Zimbabwe has been effectively enforcing laws and policies to protect elephant and other species, and has implemented new measures and ramped-up national and local efforts to combat poaching;
- Demonstrates that hunting offtakes are sustainable and based on the consideration of all causes of elephant mortality, biological and critical social factors, and scientific recommendations;
- Reflects the full cooperation of ZPWMA in responding to the FWS' information demands, including production of sensitive budget information that underscores the essential role hunting, especially elephant hunting, plays in supporting wildlife conservation, management, and protection, both in the Parks estate and community areas;
- Evidences how the government's grant of Appropriate Authority to local landholders has created a public-private-community partnership that obligates all stakeholders to invest in protection and conservation of wildlife on their lands; and

- Proves that licensed, regulated hunting enhances the survival of elephant and other species in the country by securing habitat, generating management funding, underwriting and supporting anti-poaching, and incentivizing greater tolerance of elephant by rural community members.

In sum, because the information provided demonstrates that the enhancement standard is met, and this information was not relied upon in denying the applications, we respectfully request reconsideration and reversal of the Denials and issuance of the requested import permits.

Reason for Reconsideration 1: Failure to Consider Best-Available Information

In the Finding, the FWS repeatedly stated it would review its negative conclusion if additional information was provided.[1] But the FWS has not done so. It has not considered hundreds of pages of information in the Denials, which rely upon the Finding.

The Finding was made on March 26, 2015. Information has been provided to the FWS from April 17, 2014 through as recently as February 2017 by Conservation Force, ZPWMA, the IUCN African Elephant Specialist Group ("AfESG"), the Safari Operators Association of Zimbabwe ("SOAZ"), Safari Club International ("SCI"), individual hunting operators, and others.[2] Most of this data has ***not*** been discussed in the Finding or in an updated finding, in the two-plus years since the Finding was made.

Rather, entire paragraphs in the Finding are identical to the July 22, 2014 negative enhancement finding.[3] Because they are not updated from July 2014, they fail to address points made by Conservation Force and ZPWMA to correct errors in that July finding. Moreover, the Finding states in several places that the FWS was not provided with specific information. However, Conservation Force previously cited to where the information was provided,[4] and ZPWMA submitted additional data in its prompt and thorough July 2015 response ("ZPWMA July 2015 Response") to the FWS' third questionnaire, dated May 12, 2015 (***after*** the Finding). The ZPWMA July 2015 Response was not considered in the Denials, which rely upon the Finding. However, the July 2015 Response provides substantial information the FWS asserts is missing.[5]

This up-to-date information cannot be ignored. It demonstrates that Zimbabwe's hunting program is well-managed and sustainable. It shows how hunting in Zimbabwe enhances the survival of the elephant. The FWS' failure to consider this information requires reconsideration of the Denials. The Finding is based on outdated information, and its reservations have been resolved. Once the new information is considered

[1] E.g., *Finding*, p. 1, 3, 6, 11.

[2] An index of the information previously submitted to the FWS is attached.

[3] *Enhancement Finding for African Elephants Taken as Sport-Hunted Trophies in Zimbabwe During 2014*, dated July 22, 2014, p. 2 ¶ 6; p. 3 ¶¶ 1-3; p. 4 ¶¶ 1-2; p. 5 ¶¶ 2-3; p. 7 ¶¶ 3-4; p. 8 ¶ 4; p. 9 ¶ 1 (changed "2002 Panel of Experts" to "1997"); p. 9 ¶ 4; p. 10 ¶¶ 1-4; p. 11 ¶¶ 3-5; p. 12 ¶¶ 1-2, 5; p. 13 ¶ 1-2; p. 17 ¶ 3; p. 18 ¶¶ 2, 4; see also paragraphs in which several sentences are identical or nearly so: p. 4 ¶¶ 3-4; p. 5 ¶ 1; p. 6 ¶ 3-4; p. 7 ¶ 2; p. 8 ¶ 3; p. 9 ¶ 3; p. 14 ¶ 4 (changed numbers of RDCs); p. 16 ¶ 4; p. 17 ¶ 5; p. 18 ¶ 3.

[4] Conservation Force also provided an Appendix that cross-referenced statements claiming not to have information against the FWS' April 4, 2014 questionnaire to ZPWMA, which did not ask for much of this information. Conservation Force, *Comment Opposing the Negative Enhancement Finding for African Elephant Taken as Sport-Hunted Trophies in Zimbabwe in 2014*, dated Oct. 16, 2014 ("*CF Oct. Comment*"), passim, & Appendix 1.

[5] E.g., Compare *Finding*, p. 9, 11 (seeking revenue information), p. 11 (seeking offtake information) with ZPWMA July 2015 Response, p. 36-43 (providing revenue and offtake tables).

by the FWS, the "enhancement" generated by elephant hunting is clear, and the requested permits should issue.

The urgency of issuing these permits has not changed since the suspension was imposed in April 2014. As the Finding recognizes, elephant hunting generates operating budget revenue for ZPWMA, incentives for Zimbabwe's community-based natural resources management program (CAMPFIRE), anti-poaching, and more. The information provided, including two CAMPFIRE reports, a SOAZ report, the ZPWMA July 2015 Response and more, makes clear that American elephant hunters are the largest source of these benefits.[6] Continued refusal to issue import permits jeopardizes this enhancement and the survival of the species.

The failure to consider the best-available information is made worse because ZPWMA responded promptly to the FWS' requests. ZPWMA responded to the first questionnaire within two weeks. Its Director-General and high-level representatives immediately traveled to DC to reinforce their response. ZPWMA responded to the second questionnaire in under six weeks; responded to third—not considered in the Finding—in five weeks; responded to the fourth—not considered in the Finding—in two weeks; and responded to the fifth —not considered in the Finding—within several weeks, with the final plan prioritization completed within six months. ZPWMA has repeatedly redirected its resources to provide information to the FWS. But the FWS has repeatedly moved the target to create an unreachable standard and demanded additional, more intensive information. The bar has been raised beyond "enhancement." The FWS has acknowledged that elephant benefit from well-managed hunting.[7] But the Finding seems to require more than well-managed —it seeks management perfection. That is simply not possible, either in Zimbabwe or in this country (even the FWS is constrained by limited resources).

The information submitted shows that licensed, regulated hunting increases habitat security, generates law enforcement funding and support, and incentivizes tolerance for elephant. It shows a sustainable use of elephant at a level far too low to be detrimental. It shows that the enhancement standard, as originally defined[8] has been met. Thus, the Denials should be reconsidered and reversed.

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[6] E.g., *ZPWMA July 2015 Response*, p. 40-41 ("The US hunting market constitutes 51% and 54% of elephant trophy hunting in Zimbabwe for the years 2013 and 2014 respectively."); CAMPFIRE Association, *Trophy Imports Suspension and the CAMPFIRE Program*) (2014), p. 4 ("*CAMPFIRE Association Report*") (U.S. hunters represent two-thirds or more of CAMPFIRE clients); E. Gandiwa, *Proceedings of the CAMPFIRE Stakeholders' Workshop: Towards the Development of a New Elephant Management Plan and Policy* (Nov. 2014) ("*CAMPFIRE Workshop Proceedings*"), p. 6-21; CAMPFIRE Association, *CAMPFIRE Hunting Income & Distribution* (Dec. 1, 2015) ("*CAMPFIRE Income Analysis*"), p. 6; ZPWMA, Presentation, *Legal Trade, Conservation, and Rural Livelihoods: A Zimbabwean Perspective* (Dec. 2016), p. 19; SOAZ, *Status of Elephant Populations, Hunting, and Anti-Poaching Effort in Safari Areas in Zimbabwe* (2014), p. 3-4 ("*SOAZ Report*")

[7] E.g., FWS, *Suspension of Import of Elephant Hunting Trophies Taken in Tanzania and Zimbabwe in 2015 and Beyond, Questions & Answers* (2014).

[8] In denying import permits for elephant from Tanzania, the FWS defined enhancement as: "activities that provide a direct benefit to the specie being hunted. Such benefits could include the use of revenue generated by the hunt to support conservation projects or to manage the species. Other benefits that could result from activities that enhance the survival of the species include improving human-wildlife conflicts, anti-poaching efforts, or habitat conservation." According to this standard and definition, and not the one created in the Finding, there is no doubt the importation of sport-hunted elephant into the U.S. enhances the species.

Reason for Reconsideration 2:
The Denials Fail to Consider Zimbabwe's State-of-the-Art Elephant Management Plans

ZPWMA has recently adopted and is implementing the most cutting-edge elephant management regime among range nations, the *Zimbabwe Elephant Management Plan (2015-2020)* ("Plan"). This effort attests to ZPWMA's commitment to elephant management and conservation. The new Plan further exemplifies the importance of sport-hunting in this system. The Denials fail to consider this essential new Plan, which the FWS has had for over one year.

Instead, the outdated Finding errs by considering *Elephant Management in Zimbabwe* to be the country's management plan, despite being told it was not.[9] The FWS' concerns about a claimed lack of measurable outcomes in Zimbabwe's actual former management plan, the *Policy and Plan for Elephant Management in Zimbabwe*, have been resolved. As the FWS was repeatedly told, a new management plan was adopted, with specific action items, deliverables, and deadlines (as suggested was necessary by the April and July negative enhancement findings).[10] The FWS knew of the new Plan's details because the FWS received the *Plan Workshop Proceedings* in December 2014, before the Finding was made.[11] The FWS was also informed that Zimbabwe would manage each main range area adaptively pursuant to a regional plan. The FWS was sent the proceeding of regional workshops, and the final regional plans as part of the final national Plan.[12] And in November 2016, the FWS was provided with information on the implementation and prioritization of these plans at the request of the Chief of Permits.[13] In short, throughout the Plan's drafting, ZPWMA and Conservation Force kept the FWS fully apprised of the status and what the Plan would entail. However, little of this information was considered in the Finding or the Denials.

Had the new Plan been considered, these permits would have to be approved. The Plan incorporates an adaptive management framework with higher-level Targets, Key Components, Strategic Objectives, and Outputs. It breaks each Key Component into specific management actions, the achievement of which will be measured and verified through Key Performance Indicators ("KPIs") and Means of Verification of KPIs. The Plan sets deadlines and assigns specific responsibility for achieving each Action. It focuses on five key components: 1. Protection and Law Enforcement, 2. Biological Monitoring and Management, 3. Social,

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[9] *CF Oct. 2014 Comment*, p. 8 ("Elephant Management in Zimbabwe 'is not a management plan,' and FWS should not expect 'specific measurable or management actions' to be in that particular document") & related attachments.

[10] *CF June 2014 Comment*, p. 13 & related attachments; *CF Oct. 2014 Comment*, p. 9 & related attachments; *CF Dec. 2014 Comment*, p. 3 & related attachments; CF Email to T. Van Norman forwarding invitation to national workshop (Nov. 13, 2014); CF Email to T. Van Norman forwarding Workshop agenda (Dec. 1, 2014); CF Email to T. Van Norman forwarding summary of Plan Workshop (Dec. 5, 2014); *ZPWMA Dec. 2014 Response*, p. 18; *ZPWMA July 2015 Response*, p. 9-14, 18-19.

[11] CF Email to T. Van Norman forwarding Proceedings of the National Elephant Management Plan Workshop (Dec. 23, 2014) ("*Plan Workshop Proceedings*").

[12] CF Email to T. Van Norman forwarding preparatory documents for Sebungwe workshop (May 4, 2015); CF Email to T. Van Norman forwarding Mana Pools Workshop Proceedings (May 5 2015); CF Email to T. Van Norman forwarding Sebungwe workshop agenda (May 8, 2015); CF Email to T. Van Norman forwarding Sebungwe workshop fact sheet (May 14, 2015); CF Email to T. Van Norman forwarding South East Lowveld Workshop Proceedings (Sept. 30, 2015); CF Email to T. Van Norman forwarding final print of Plan (Feb. 29, 2016); *ZPWMA July 2015 Response*, Attachments.

[13] L. Nyaguse (ZPWMA) Email to T. Van Norman forwarding Zimbabwe National Elephant Supplementary Management Plan (2015-2010) (Nov. 9, 2016) ("*Plan Supplement*").

Economic, and Cultural Framework, 4. Building Conservation Capacity, and 5. Coordination, Collaboration, and Program Management.[14]

The Plan breaks down elephant management by range, as their challenges differ. For example, authorities must manage overpopulated elephant and provision of water in North West Matabeleland compared to a reduced population targeted to recover in Sebungwe. These differences are addressed in the actions and indicators of each regional plan.[15]

The Plan provides for accountability, transparency, and effective implementation in the terms of reference for an Elephant Manager tasked with directing elephant management in Zimbabwe. The Plan also created a National Elephant Management Committee and four range-specific committees to review progress and oversee implementation.[16]

Examples of "Protection" activities include establishing a rapid-response anti-poaching unit in conjunction with the Zimbabwe Republic Police, expanding ZPWMA's informer networks, and connecting national law enforcement databases. Monitoring activities include periodic surveys and setting Thresholds of Potential Concern as early-warning indicators in key habitats. An example KPI for "Building Conservation Capacity" is to channel most income from elephant hunting back into elephant management, with ongoing oversight through reports on funds available and utilized.[17] As these examples show, the Plan incorporates ***specific*** actions and KPIs, and specific oversight mechanisms.

The Plan addresses human-elephant conflict in the Social, Economic, and Cultural Framework component. The Plan recognizes there is no single solution to conflict, and commits to "undertake additional research on problem animal control and minimizing conflict." It emphasizes the importance of local communities' tolerance towards elephants through a system of benefits-sharing as a long-term solution to conflict.[18]

The Plan also specifically integrates licensed, regulated elephant hunting as a management tool:

> To have a future, elephant must have a value. Value to the governing authorities and to the local people. The greater the value, the greater the tolerance of them is likely to be … Regulated sport hunting converts wildlife into assets for the benefit of local people and the country as a whole… elephant and other wildlife populations will be negatively affected though reduced conservation efforts arising from low funding and reduced goodwill from the communities, when… the elephant has the economic potential to raise adequate funds to support itself and other species. For these reasons, Zimbabwe confirms its commitment to the sustainable use of elephant and other wildlife in this Action Plan.[19]

[14] *Plan*, p. 16-17.

[15] *Plan*, p. 38-80 (Annexes 9.4-9.7).

[16] *Plan*, p. 13-14, 35-37.

[17] E.g., *Plan*, p. 19-27.

[18] *Plan*, p. 15.

[19] *Plan*, p. 12.

The Plan addresses the Finding's concerns on every level. It implements an effective management system, with the necessary "specific goals and measures with specific actions to be taken."[20] Moreover, ZPWMA provided to FWS a 2016 report on its progress in implementing the Plan and prioritizing implementation, including of the regional plans. The Plan Supplement emphasizes law enforcement and training to combat poaching and ivory trafficking.[21] The FWS requested the prioritization, and ZPWMA again demonstrated its good faith in preparing and providing the document, which was not considered in the Finding or the Denials. Because the Finding's concerns are resolved and new information reveals an effective, adaptive management plan and implementation thereof in Zimbabwe, the Denials should be reconsidered and reversed.[22]

Reason for Reconsideration 3:
Zimbabwe has Current Elephant Population Information that Guides its Sustainable Use

The AfESG recently estimated Zimbabwe's elephant population at 82,630 ± 8,589 across a range of 81,228 km^2.[23] Zimbabwe maintains the second-largest elephant population in Africa, at a level nearly double its estimated carrying capacity.[24] The population is most concentrated in the North West Matabeleland and South East Lowveld ranges. The current national estimate is approximately 6,000 lower than the 2001 countrywide estimate, a percentage calculated as "not statistically significant" by the survey's authors.[25] Zimbabwe's current elephant population is 20% larger than its population in 1997 (66,000), when the FWS made a positive enhancement finding. The Finding does not explain why a 20% increase is insufficient.[26]

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[20] *Finding*, p. 6. The Plan applies a multi-tiered approach, using tailored goals leading to achievement of the "Long-Term Vision," which is: "To conserve elephants at levels that will enable them to contribute to the conservation of biodiversity, national development and Zimbabwe's cultural heritage." The Plan establishes intermediate "Targets" to achieving these goals, which are in line with the 1997 *Policy and Plan*: "1. To maintain at least four demographically and genetically viable elephant populations in Zimbabwe[;] 2. To maintain or increase core protected range of elephant in Zimbabwe[;] 3. To maintain numbers/density of elephant at levels that do not adversely impact on biodiversity conservation goals while contributing to economically viable and sustainable wildlife-based land uses in Zimbabwe." As in the draft provided to the FWS in December 2014, the final Plan is organized by "Key Components," and then "Strategic Objectives" that explain the "Key Components." "Outputs" describe the desired outcomes, and are to be achieved through implementation of "Key Activities/Actions." That implementation is monitored by the KPIs and Means of Verification of the KPIs.

[21] *Plan Supplement*, p. 6.

[22] As ZPWMA explained, Zimbabwe conserves and manages elephant on every level. Zimbabwe and bordering range states have formed Trans-Frontier Conservation Areas ("TFCAs") to address the elephant's migratory nature and cross border populations. Further, through the Plan Zimbabwe implements the action plans adopted by the Southern African Development Community ("SADC"), and the SADC Regional Elephant Management Strategy of 2007. E.g., *ZPWMA April 2014 Response*, p. 12; *ZPWMA July 2015 Response*, p. 15; *CF June 2014 Comment*, p. 12 & related attachments; *CF Oct. 2014 Comment*, p. 9 & related attachments.

[23] IUCN/AfESG, African Elephant Status Report 2016 (Sept. 2016), publicly available at https://www.dropbox.com/s/7a8w3kk6r9hzm0r/AfESG%20African%20Elephant%20Status%20Report%202016.pdf?dl=1.

[24] *Plan*, p. 3.

[25] *Plan*, p. 3. As explained above, the Management Plan incorporates regional plans to address challenges unique to each range and manage elephant within regional targets.

[26] The Finding suggests an increase to over 100,000 elephant would be acceptable. P. 8. As ZPWMA, Conservation Force, Rowan Martin, and others pointed out, a population of that size would be a catastrophe for the country's bio-diversity. The Finding does not account for the expansion in Zimbabwe's elephant since 1997, or the management measures implemented since then. Zimbabwe's elephant population has rebounded incredibly, from a low of 4,000

Worse, the Finding does not rely on this up-to-date estimate, although the FWS received the preliminary survey results in December 2014.[27] Nor does the Finding rely on the best-available information in the FWS' possession as of March 2015, which included comments from the AfESG and numerous survey results.[28] The Denials should be reconsidered because the Finding relies upon outdated data that was proven to be inaccurate by Conservation Force, ZPWMA, and the AfESG.

For example, the Finding reuses language that cites a statistic from *Elephant Management in Zimbabwe*. The statement was disavowed by its author, and Conservation Force explained how the percent limitation was being taken out of context.[29] The Finding's failure to consider information that undercuts a "fact" on which its negative conclusion was based is clear grounds for reconsideration. Similarly, the Finding admits the April finding erroneously interpreted the AfESG's Elephant Database by misconstruing its data quality categories. This error was pointed out in CF's June 2014 Comment and in a May 30, 2014 email from Dr. Holly Dublin, AfESG Chair.[30] It was corrected in the July enhancement finding.

However, the July finding continued to ignore pertinent information in the database, prompting Dr. Dublin to send a November 3, 2014 comment in which she corrected several critical points of information. First, the addition of a 2007 survey resulted in the addition of 30,000 "Definite" elephant in Zimbabwe. Second, the results of four recent surveys did not show a "substantial decline," as the July finding stated, but largely reflected stable or increasing populations. The Finding apparently accepted these comments, and edited the prior statements to incorporate Dr. Dublin's corrections.[31]

However, Dr. Dublin offered three more corrections not discussed in the Finding. Instead, the challenged language was copied and pasted from the July document into the Finding.

- Dr. Dublin criticized the July finding's dismissal of a 2013 survey in Save Valley Conservancy for so-called "double counting," stating that, even if double-counting occurred, the count still reflected an increase in the elephant population;

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in 1900. *ZPWMA July 2015 Response*, p. 3; *CF June 2014 Comment*, p. 7-8 & related attachments; *CF Oct. 2014 Comment*, p. 7, 10 & related attachments. Compare FWS, *Enhancement Finding for African Elephants Taken as Sport-Hunted Trophies in Zimbabwe* (July 2, 1992), p. 1.

[27] CF Email to T. Van Norman forwarding preliminary survey results (Dec. 5, 2014).

[28] H. Dublin Email to T. Van Norman attaching AfESG Letter/Comment on July finding (Nov. 3, 2014), p. 2-9 ("*AfESG Letter*"); Aerial Survey of Elephants and Other Large Herbivores in the Mid-Zambezi Valley; 2007 Aerial Survey of Elephants and Other Large Herbivores in North-West Matabeleland; 2010 Aerial Survey of Elephants and Other Large Herbivores in Chewore Safari Area; 2013 Aerial Survey of Elephants and Other Large Herbivores in the Save Valley Conservancy; and 2013 Aerial Survey of Elephants and Other Large Herbivores in Gonarezhou National Park.

[29] *CF Oct. 2014 Comment*, p. 9, 15 & related attachments.

[30] Compare *Finding*, p. 7; with *CF June 2014 Comment*, p. 9 & related attachments; H. Dublin Email to T. Van Norman commenting on the April finding's misinterpretation of the AfESG Database (May 30, 2014).

[31] Compare *AfESG Letter*, p. 2 ("The AED shows, however, that three surveys carried out in this period … estimated higher totals than their respective previous, comparable surveys, although the differences were not significant. A fourth survey, Chewore (2010), resulted in an estimate lower than its previous, comparable survey, but the difference was also not statistically significant. Furthermore, the 2010 survey for Chewore did not cover the entire Zambezi Valley ecosystem, and therefore it is possible that the apparent decline, however slight, may be due to elephant movements within the ecosystem rather than to an actual decline.") with July finding, p. 6; *March Finding*, p. 7.

- Dr. Dublin concluded that a 4% carcass ratio in a 2013 survey of Gonarezhou National Park was a "reasonable figure," and the July finding erroneously "conflat[ed] … carcass ratios … and mortality rates, and its conclusion is unwarranted";
- Dr. Dublin noted that updated PIKE data was publicly available months before the July finding was made, yet "the finding stated that 2012 and 2013 data were not available," and pointed out that the two PIKE sites in Zimbabwe "have relatively small elephant populations and are by no means intended to be representative of the situation in the country as a whole."[32]

Given that Dr. Dublin is one of the world's foremost experts in elephant, due deference should have been given to her comments and suggestions. Conservation Force made similar points in our June and October comments as well, and provided comments from the authors of the Save Valley survey report responding to the FWS' statements.[33] We provided fice surveys pending the AfESG's review and not included in the AfESG's or FWS' estimates, and submitted updated PIKE information showing the Proportion of Illegally Killed Elephant had declined at the Zimbabwe sites[34]—contrary to the July finding's statements, copied-and-pasted into the Finding. The Denials' failure to review this best-available information, and reliance upon out-of-date or misinterpreted information, requires reconsideration.

Reason for Reconsideration 4: The Best-Available Information Demonstrates that Zimbabwe has been Enforcing its National Regulations as Effectively as Possible

ZPWMA is succeeding in managing and conserving its elephant. The most compelling evidence is the historic increase in its population, to become Africa's second-largest. ZPWMA achieved these results by largely curbing poaching and successfully prosecuting poachers as a result of adaptive and pro-active law enforcement measures. ZPWMA has also implemented a system of sharing responsibility with the private sector and communal landholders so as to share the financial burden of its management and enforcement obligations. The Finding fails to acknowledge these achievements and responsibility-sharing.[35] Its failure to do so requires reconsideration, and reversal of the Denials.

Evidence of ZPWMA's enforcement success was provided in their April 2014 and July 2015 Responses, and in Conservation Forces' June 2014 and October 2014 Comments. For instance, ZPWMA rapidly responded to the 2013 Hwange poisoning incident. Working with the hunting operator's team to track the poachers,

[32] *AfESG Letter*, p. 4-5.

[33] CF Email to T. Van Norman forwarding response from authors of the Save Valley Conservancy survey (Jan. 6, 2015); *CF Oct. 2014 Comment*, p. 13 & related attachments.

[34] E.g., 2005 Aerial Survey of Elephants and Other Large Herbivores in the Mid-Zambezi Valley; 2007 Aerial Survey of Elephants and Other Large Herbivores in North-West Matabeleland; 2010 Aerial Survey of Elephants and Other Large Herbivores in Chewore Safari Area; 2013 Aerial Survey of Elephants and Other Large Herbivores in the Save Valley Conservancy; and 2013 Aerial Survey of Elephants and Other Large Herbivores in Gonarezhou National Park; *see CF June 2014 Comment*, p. 4-7 & related attachments; *CF Oct. 2014 Comment*, p. 11 & related attachments.

[35] The FWS recognizes "there may be limited resources available for elephant management." *Finding*, p. 2. However, the FWS does not account for this in evaluating ZPWMA's efforts and results. "Enhancement" does not call for unlimited resources and perfect implementation, it seeks benefits. The benefits provided through the sport-hunting of elephant are clear and convincing, and the Denials should be reversed.

ZPWMA successfully arrested all 35 members of the team. ZPWMA's investigation and prosecution efforts led to the deterrent sentencing of each poacher to terms of 9 to 16 years in prison.[36]

ZPWMA specifically responded to the threat of poaching in Hwange by improving radio communications, adding aerial surveillance, and holding 35 public awareness meetings in the area.[37] ZPWMA then stepped-up its anti-poaching nationally by adopting a number of "Urgent Measures." ZPWMA acted to increase poaching penalties, criminalize the use of cyanide in poaching, increase air surveillance of protected areas, collaborate with national law enforcement and military agencies to raise elephant poaching to "a level of National Security in Zimbabwe," improve intelligence-sharing across international borders, and other important undertakings.[38] ZPWMA also held a judiciary awareness program to ensure full implementation of relevant poaching laws and penalties throughout prosecution and sentencing.[39]

ZPWMA directs most of its financial resources to anti-poaching and enforcement. As shown in the July 2015 Response, most of ZPWMA's budget (77%) is allocated for staff costs and patrol provisions.[40] These expenditures fund anti-poaching throughout the elephant range. Despite financial constraints, ZPWMA has been able to continuously hire to expand the number of patrol days in the field. ZPWMA has a staff of 1,504 active field rangers, with the intent to add more.[41] ZPWMA has shown that it can mobilize when called upon: after the Hwange poisoning, a new station with 15 field rangers was established in the area.[42]

Over 80% of spending under the new elephant management Plan has been on law enforcement (anti-poaching) and trainings, with law enforcement identified as the number one priority going forward.[43] The budget and operational data provided in the ZPWMA July 2015 Response and Plan Supplement addresses the FWS' asserted lack of information in the Finding. And although financial constraints exist in Zimbabwe (as in most range states), ZPWMA has effectively and efficiently maximized the impact of every dollar spent on anti-poaching. ZPWMA's results in curbing poaching speak for themselves.

The Finding continues to rely on outdated, unfounded criticisms from the July finding that were corrected by Conservation Force and ZPWMA. First, though the Finding claims not to have received information on Zimbabwe's poaching arrests and prosecutions, that information was not requested until May 2015, yet was provided in ZPWMA's April 2014 Response. It would be unfair to base a negative finding on data that had not been requested. But the data ***was*** provided, and should have been reviewed.[44]

Further, the Denials mistaken rely on the Finding's comments and interpretation of outdated ETIS reports. Conservation Force objected to these reports being taken out of context in our October 2014 Comment,

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[36] *ZPWMA July 2015 Response*, p. 35; *CF Oct. 2014 Comment*, p. 18 & related attachments.

[37] *ZPWMA July 2015 Response*, p. 35; *ZPWMA April 2014 Response*, p. 13; *ZPWMA Dec. 2014 Response*, p. 16-20; *CF Oct. 2014 Comment*, p. 18 & related attachments.

[38] *ZPWMA July 2015 Response*, p. 27-31; *ZPWMA Dec. 2014 Response*, p. 16-18.

[39] *ZPWMA July 2015 Response*, p. 34.

[40] *ZPWMA July 2015 Response*, p. 36-41.

[41] ZPWMA hired 100 rangers in 2014. *ZPWMA July 2015 Response*, p. 32-33.

[42] *ZPWMA July 2015 Response*, p. 27; *ZPWMA April 2014 Response*, p. 13.

[43] *Plan Supplement*, p. 3-4.

[44] *ZPWMA April 2014 Response*, p. 12, 14.

and provided evidence of improvements since 2010.[45] The Finding's reuse of these paragraphs, whose validity and applicability were challenged, merits reconsideration.

Finally, as discussed further under "Local Conservation Efforts," the Parks and Wildlife Act Chapter 20:14 devolved authority to manage and benefit from wildlife on communal and private lands to the landholders. In Safari Areas, ZPWMA leases concessions to pre-qualified hunting operators, which gives them authority to manage and benefit from approved wildlife in those areas.[46] "ZPWMA is engaging private players in co-management in some areas … this will help in resource mobilization and management for law enforcement. Long-term lease agreements (10-25 years) are being entered into to manage some protected areas."[47] In certain areas, ZPWMA partners with safari operators[48]; in others, they partner with non-profits, such as the Tashinga Initiative in the Zambezi Valley and WWF in the Hwange-Sanyati Biological Corridor.[49] In these ways, ZPWMA is sharing responsibility for enforcement of national regulations. This allows ZPWMA to do more with less, and has been especially crucial since receipts from hunting have fallen since the FWS suspension on ivory imports.

Reason for Reconsideration 5: Elephant Hunting in Zimbabwe is a Sustainable, Beneficial Use

ZPWMA's elephant hunting program is sustainable. Information submitted to the FWS demonstrates that quotas and offtakes are responsibly set in a participatory process, considering a range of inputs including all causes of elephant mortality; ZPWMA allocates quotas by region and locality; and recent poaching has remained fairly low, especially in comparison to other range states. This information has been submitted to the FWS on multiple occasions, including but not limited to:

- April 2014: poaching statistics; poacher arrest and prosecution statistics; four-page description of ZPWMA's quota-setting process;
- June 2014: poaching statistics in CAMPFIRE areas;
- December 2014: poaching and PAC statistics; offtake percentages from management, hunting, and trade in skins; two-page supplemental explanation of ZPWMA's quota-setting process;
- December 2014: hunting and PAC offtakes; quota utilization in CAMPFIRE areas;
- December 2014: carcass observance and estimates from the 2014 aerial survey;
- March 2015: updated MIKE/PIKE statistics;
- May 2015: poaching statistics from Mana Pools workshop;
- May 2015: poaching and offtake statistics in the Sebungwe;
- July 2015: carcass observance and estimates from the 2014 aerial survey; PIKE data; offtakes from six categories requested by the FWS; poaching and poacher investigation, arrest, and prosecution statistics; five-page supplemental explanation of ZPWMA's quota-setting process; quota allocation by range;
- September 2015: poaching and hunting offtakes from the South East Low Veld workshop;
- December 2015: hunting off-takes and quota utilization in CAMPFIRE areas;

[45] *CF Oct. 2014 Comment*, p. 22 (pointing out that the ETIS report was known to "confound" legal and illegal trade in small ivory products) & related attachments.

[46] *ZPWMA April 2014 Response*, p. 23-25.

[47] *ZPWMA Dec. 2014 Response*, p. 19.

[48] *ZPWMA July 2015 Response*, p. 34.

[49] *ZPWMA July 2015 Response*, p. 33.

- December 2016: two-page supplemental explanation of ZPWMA's quota-setting process;
- And more.[50]

This long list of information provided refutes the Finding's complaint that the FWS did not have "adequate information" about elephant offtakes, poaching, or quota-setting. The information was available. But the Denials do not consider it. If it had been considered, the FWS would have had to make a positive finding.

This best-available information demonstrates that ZPWMA's quotas are "scientifically determined" not to "compromise[e] [the species'] biological proliferation… In Zimbabwe, determination and implementation of hunting quotas goes through a rigorous quota-setting methodology" that accounts for all mortalities, including from hunting, poaching, PAC, natural causes and disease. In setting quotas, ZPWMA considers population sizes, trends, and densities; property sizes and habitat quality; environmental changes; human-wildlife conflict, national policies, and management targets; poaching trends; land tenure; trophy quality; hunt success; ranger monitoring; species sensitivity and research on the species; and more.[51] Quotas are set in participatory workshops for each range area. While stakeholders may propose an initial quota, their proposals are reviewed and revised as needed by ZPWMA ecologists to ensure the quotas are assessed at a sustainable level, having negligible impact on the population.[52] In 2014, Zimbabwe's offtake quota was set under 300 elephant; in 2016, it was set at 400.[53] The level of ***offtake*** authorized is well below that of ***export*** allowed under Zimbabwe's CITES quota (500 elephant), for good reason—exports may be delayed due to transport, taxidermy/processing, or permitting issues.

ZPWMA's 2014 quota of 300 mature elephant bulls represents only 0.37% of the total elephant population (82,000+). Zimbabwe's 2016 quota represents only 0.49%. These percentages are comfortably below the sustainability threshold of 0.6-0.75%. Most critically, however, actual offtakes are even lower, on average only 204 mature elephant bulls per year. That represents only 0.25% of Zimbabwe's elephant population. The Denials should be reconsidered and reversed, as there can be no question this limited use of elephant through sport- hunting is sustainable.

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[50] *ZPWMA April 2014 Response*, p. 12, 14, 19-22; *CAMPFIRE Association Report*, p. 2; *ZPWMA Dec. 2014 Response*, p. 16, 22-25; *CAMPFIRE Workshop Proceedings*, p. 6-24; CF Email to T. Van Norman attaching newest MIKE/PIKE data (Mar. 11, 2015); *Proceedings of the Mana Pools Anti-Poaching Workshop* (May 2015); CF Email to T. Van Norman attaching background data on elephant in the Sebungwe range (May 11, 2015); *ZPWMA July 2015 Response*, p. 22-27, 43-49; *Proceedings of the South East Lowveld Elephant Management Planning Workshop* (Sept. 2015); CF Email forwarding *Hunting Income Analysis of CAMPFIRE Districts from Hunting* (Dec. 1, 2015); ZPWMA, Presentation, *Legal Trade, Conservation, and Rural Livelihoods: A Zimbabwean Perspective* (Dec. 2016), p. 5-6.

Publicly available data from the Great Elephant Census identified Zimbabwe as having one of the four lowest carcass ratios in Africa, behind only Uganda, Malawi, and Botswana, publicly available at www.greatelephantcensus.org.

[51] E.g., *ZPWMA Apr. 2014 Response*, p. 19-22; *ZPWMA Dec. 2014 Response*, p. 22-25; *ZPWMA July 2015 Response*, p. 43-47; ZPWMA, Presentation, *Legal Trade, Conservation, and Rural Livelihoods: A Zimbabwean Perspective* (Dec. 2016), p. 5-6.

[52] *ZPWMA July 2015 Response*, p. 43-46; ZPWMA, Presentation, *Legal Trade, Conservation, and Rural Livelihoods: A Zimbabwean Perspective* (Dec. 2016), p. 5-6. Licensed, regulated hunting has nominal effect on elephant population, because of the selectivity of the harvest. E.g., *CF June 2014 Comment*, p. 3, 9-10 & related attachments (including R. Martin, *Second Report: Trophy Hunting from Declining Population* (2014), p. 8, 10, 15, 18-20, & R. Martin, *Background Study, Elephants* (2015), p. 34, 56).

[53] *ZPWMA July 2015 Response*, p. 44, 46.

Further, the extensive documentation provided by ZPWMA, Conservation Force, and others demonstrates that other offtakes, including poaching and PAC, are sustainable. Poaching has largely been controlled in the last several years, and PAC is kept in check through the incentives generated by CAMPFIRE (please see the next section).[54]

Poaching levels have declined in Zimbabwe, and across Africa, since the worst of the impact in 2011.[55] As shown in ZPWMA's July 2015 Response, a decline in elephant poaching is evident since the high of 223 in 2011, to 212 in 2012 and 194 in 2014. (Poaching figures in 2013 are skewed by the mass poisoning incident at Hwange National Park that killed 103 elephant, but if that number is "normalized" to 190, it is consistent with the decreasing trend.)[56] Likewise, the Proportion of Illegally Killed Elephants ("PIKE") at the Chewore and Nyami Nyami Monitoring the Illegal Killing of Elephants ("MIKE") sites in Zimbabwe has fallen: to 0.40 in 2013, 0.17 in 2014, and 0.29 in 2015 at Chewore, and from 0.81 in 2011 to 0.27, 0.22, 0.37, and 0.35 in the years 2012 to 2015 at Nyami Nyami. The most recent figures are well below the 0.5% threshold which signifies unsustainable poaching.[57] The decline in poaching undoubtedly stems from ZPWMA's enhanced anti-poaching, as described in the section above.

Recognizing both a mutual interest, and that collaboration will allow for a more efficient use of resources, ZPWMA and the hunting sector collaborate extensively in anti-poaching. Conservation Force submitted numerous specific evidence of this.[58] A few examples from this evidence are below:

- The Dande Anti-Poaching Unit ("DAPU") in the Zambezi Valley has catalyzed a significant decrease in poaching in their areas. In 2010, DAPU reported 40 elephant carcasses. In 2016, they observed seven. DAPU team members have grown so skilled in anti-poaching tactics they work alongside ZPWMA rangers in patrolling Mana Pools National Park. Charlton McCallum Safaris spent $95,006 on DAPU's anti-poaching activities in 2016, including salaries, rations, rewards, equipment, and

[54] PAC offtakes have been between 44-52 elephant from 2013-2015, a negligible amount in a population over 82,000 elephant, and at or below 1.0% when added to poaching and hunting offtakes. ZPWMA issues few PAC permits, and instead relies on the benefits of the CAMPFIRE program and voluntary actions of hunting operators to minimize crop-raiding and losses to elephant, and thus minimize PAC. The CAMPFIRE Workshop demonstrated that this system is working, as PAC figures were typically low across the districts. *CAMPFIRE Workshop Proceedings*, p. 6-21; *see also CF June 2014 Comment*, p. 15-7 & related attachments; *CF Oct. 2014 Comment*, p. 26-33 & related attachments; *CF Dec. 2014 Comment*, p. 3-7 & related attachments; *CF Jan. 2015 Comment* & related attachments.

The uncited "anecdotal evidence" relied upon in the Finding is unreliable, and is another incorrect "fact" on which the negative finding was based that requires reconsideration.

[55] G. Wittmeyer et al., *Illegal Killing for Ivory Drives Global Decline in African Elephants*, Proceedings of the National Academy of Sciences (July 22, 2014).

[56] *ZPWMA July 2015 Response*, p. 43.

[57] *CF Oct. 2014 Comment*, p. 21-22 & related attachments; CF Email to T. Van Norman attaching updated MIKE/PIKE data (Mar. 11, 2015); *ZPWMA July 2015 Response*, p. 25; CITES/MIKE Database, publicly available at https://cites.org/ eng/ prog/mike/data_and_reports.

[58] E.g., *CF June 2014 Comment*, p. 17-19 & related attachments (including SOAZ report); *CF Oct. 2014 Comment*, p. 22, 26-33 & related attachments; *CF Dec. 2014 Comment*, p. 3-7 & related attachments; *CF Jan. 2015 Comment* & related attachments; *Proceedings of the Mana Pools Anti-Poaching Workshop* (May 2015); CF Email to T. Van Norman forwarding reports of anti-poaching efforts in Zambezi Valley (Dec. 3, 2015); CF Email to T. Van Norman forwarding hunting operator anti-poaching efforts in Zambezi Valley (Jan. 5, 2016); CF Email to T. Van Norman forwarding DAPU film (May 9, 2016); CF Emails to T. Van Norman forwarding DAPU Reports (June 15, 2015, May 23, 2016, & Jan. 18, 2017).

vehicles. DAPU's expenditures in 2015 topped $80,000 and in 2014, they were over $72,000. This is an expanding program, and has contributed significantly to anti-poaching in the Zambezi Valley, including through the additional support of aerial surveillance. ***Mr. Jines' hunt took place in the Mbire District and with Charlton McCallum Safaris. Mr. Jines' hunting fees, including his trophy fee and voluntary contributions, are directly contributing to DAPU and the operators' extensive community investment***.

- The SOAZ Report identified almost $1 million spent on anti-poaching in 2013 by a small sample of 14 operators. These operators employed a total of 245 scouts on the ground, an average of 17-18 scouts per company.
- Lodzi Hunters collaborates with the Binga district council to restore wildlife in their concession, on which they have a long-term lease. They maintain a 12-member anti-poaching team that patrols the concession and the borders of Hwange National Park. Lodzi Hunters coordinates with ZPWMA to ensure full and efficient coverage. Lodzi Hunters' anti-poaching and incentives programs cost the company over $350,000 per year, in addition to their contractual payments to the CAMPFIRE district and wards. 95% of Lodzi Hunters' income comes from elephant hunting.

In short, the private-sector's contributions against poaching are extensive. They were not duly considered in the Denials, even though they are an essential component of Zimbabwe's elephant management.[59] For this reason, the Denials should be reconsidered, and will need to be reversed based on proper evaluation of the submitted data.

Reason for Reconsideration 6: Revenues Generated from Elephant Hunting in Zimbabwe are Reinvested in Elephant Conservation Efforts by ZPWMA and CAMPFIRE Communities

The information provided to the FWS documents that elephant hunting accounts for the largest percent of revenue generated by hunting across all four land categories (safari areas, communal land, private land, and forestry areas). In 2014, over $6.2 million in trophy fees was generated from elephant hunts, with $5 million of that revenue accruing to ZPWMA to reinvest in wildlife management and enforcement.[60] Over 50% of that revenue comes from U.S. hunters.[61] Put differently, "the African elephant is one of the biggest drawcard species from a hunting perspective and is at the centre of all the major hunts… Generally hunting contributed an average of USD22m to the country's GDP in 2014 and 2015..."[62]

A significant portion of ZPWMA's operating budget relies upon hunting income (although that proportion declined in 2015, as hunting income has decreased, largely due to the FWS' elephant suspension and non-issuance of lion import permits).[63] Most of this is attributable to elephant hunts. In turn, most of ZPWMA's operating funds are directed to ranger salaries, anti-poaching, and law enforcement—over $3.1 million in Safari Areas alone (and staff costs in Safari Areas are covered by hunting revenues). Put simply, most of the revenues coming in from elephant hunting are reinvested in and contribute to the protection and

[59] *Plan*, p. 12 ("The Role of Sport Hunting in Elephant Conservation").

[60] *ZPWMA July 2015 Response*, p. 48.

[61] *ZPWMA July 2015 Response*, p. 41.

[62] ZPWMA, Presentation, *Legal Trade, Conservation, and Rural Livelihoods: A Zimbabwean Perspective* (Dec. 2016), p. 9-10.

[63] *ZPWMA Dec.* 2014 *Response*, p. 21.

recovery of elephant by being reinvested in law enforcement and anti-poaching.[64] The Denials' failure to consider the July 2015 Response and information about ZPWMA's revenue, budget, and expenditures requires reconsideration and reversal.

In communal areas, elephant hunting is the financial backbone of CAMPFIRE. CAMPFIRE is the mechanism whereby communities benefit from living with wildlife, and largely from living with elephant. The program has built tolerance within communities through creation of incentives, especially due to the funding of infrastructure projects that improve rural livelihoods across communities.[65] The Finding correctly admits that "CAMPFIRE plays a role in elephant management." More precisely, CAMPFIRE plays an ***essential*** role in elephant conservation by reducing conflicts between elephant and the communities who maintain elephant on their lands. Zimbabwe's Parks and Wildlife Act Chapter 20:14 empowered rural people living among wildlife to effectively benefit from it. CAMPFIRE is the mechanism created to facilitate this.

From 1989-2006, CAMPFIRE channeled more than $20 million to rural villages and $17 million to rural district councils.[66] From 2010-2015, hunting fees accounted for over $11 million in revenue, 70% of which came from elephant hunting (until the suspension reduced demand for elephant hunting), and two-thirds of which came from U.S. elephant hunters. Put differently, over $5 million accrued directly to CAMPFIRE communities from U.S. elephant hunters until the suspension reduced that amount, e.g., to 54% of hunts in 2014.[67] (Until then, 70% of CAMPFIRE revenue was generated by elephant hunts and $550,000 in trophy fees alone were generated in communal lands in 2014.[68]) These income receipts are "often understated," as economic multipliers "are not captured as part of CAMPFIRE income," and "[t]he proportion of safari operating expenses paid locally in the form of wages and salaries, and purchase of materials is often not recorded."[69]

According to the most recent audit of participating CAMPFIRE districts, "Data from 9 CAMPFIRE Districts … shows that approximately 60% of the allocated quota is utilized and that the majority of hunters (53%) originate from America. These hunters have contributed US$9 million … during the period 2010-2015 compared to US$8 million by the 40 other nations.... The income generated from trophy fees in the last 6

[64] *ZPWMA July 2015 Response*, p. 36-41, 48-51; ZPWMA, Presentation, *Legal Trade, Conservation, and Rural Livelihoods: A Zimbabwean Perspective* (Dec. 2016), p. 9-10.

[65] E.g., *CAMPFIRE Association Report*, p. 1-11; *CAMPFIRE Workshop Proceedings*, p. 6-24; CF Email to T. Van Norman attaching *CAMPFIRE Income Analysis*; CAMPFIRE Association, *The Role of Trophy Hunting of Elephant in Support of the Zimbabwe CAMPFIRE Program* (Dec. 2016), p. 12-16 ("*CAMPFIRE—Role of Hunting Report*"), publicly available at http://campfirezimbabwe.org/index.php/downloads.

[66] *CAMPFIRE Association Report*, p. 8; *CAMPFIRE—Role of Hunting Report*, p. 9-11; ZPWMA, Presentation, *Legal Trade, Conservation, and Rural Livelihoods: A Zimbabwean Perspective* (Dec. 2016), p. 19, (U.S. hunters make up 76% of CAMPFIRE clients).

[67] *CAMPFIRE Association Report*, p. 3-4; *CAMPFIRE Income Analysis*, p. 1, 6 ("it is highly probable that the decline in hunting income for 2014 was largely caused by the suspension of trophy imports by United States of America. The suspension has a lag effect on income, and preliminary calculations of earnings for 2015 indicate a further continuing decline."); *CAMPFIRE—Role of Hunting Report*, p. 9-11.

[68] *ZPWMA July 2015 Response*, p. 48, 50; *see also CAMPFIRE Workshop Proceedings*, p. 6-24.

[69] ZPWMA, Presentation, *Legal Trade, Conservation, and Rural Livelihoods: A Zimbabwean Perspective* (Dec. 2016), p. 17; *see also* p. 11-20.

years (2010 – 2015) is approximately US$11.4 million of which elephant trophy fees contributed 65%."[70] In short, U.S. elephant hunters are the critical source of funds for CAMPFIRE communities.

Hunting funds are invested in projects that benefit the communities overall: building classrooms or clinics; purchasing farm equipment; rehabilitating water supplies; purchasing vehicles used in wildlife monitoring and anti-poaching; installing solar power; and many other infrastructure improvements. CAMPFIRE links these tangible benefits for rural residents to protection of wildlife. Its infrastructure creates conservation officers and monitoring programs, and employs game scouts, which generates significant benefits for the elephant as well. This is vital because otherwise elephant are largely viewed as threats, not assets.[71]

The grant of Appropriate Authority means that ZPWMA foregoes the fees from hunting in CAMPFIRE areas, and the fees and other benefits accrue to the communities. Operators in CAMPFIRE communities contract with the district councils, and are bound to pay trophy, concession, and other fees—or more, depending on their contracts—to the councils (41%) and to the wards directly (55%). Conservation Force submitted documentation evidencing that many operators contribute much more than just fees. For example, in the Mbire District in which Mr. Jines hunted, Charlton McCallum Safaris operates a "genuine joint venture" with the Mbire district council and wards. In 2013-2015, Charlton McCallum Safaris paid over $1.05 million in fees and revenue-sharing, including over $470,000 directly into ward accounts. The district significantly benefits from this partnership, including: constructing a clinic and nurses' houses; constructing a wildlife administration office; constructing storerooms; constructing 14 classroom blocks, seven teachers' houses, and one school office; constructing and equipping of grinding mills; and constructing and equipping two hand-pump boreholes, water pipes, toilets, water storage; constructing one tourist camp; acquiring two tractors.[72] 90% of the district's income comes from hunting and ~35% of that is from elephant hunting. 90% of hunting clients are U.S. citizens. In short, at least $330,750 accrued to the Mbire district and rural communities as a result of U.S. elephant hunters in 2013-2015.[73] This is but one example. Conservation Force has submitted evidence of many more, including contributions of Lodzi Hunters and Martin Pieters Safaris, among others.[74]

The Denials do not consider the best-available information. They rely upon the Finding, which cites to old and limited data on CAMPFIRE. The best-available information demonstrating CAMPFIRE's benefits must be evaluated, and accordingly, the Denials should be reconsidered and reversed.

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[70] *CAMPFIRE—Role of Hunting Report*, p. ii.

[71] *CAMPFIRE Association Report*, p. 3-4, 7-11; *CAMPFIRE Income Analysis*, p. 1-2; *CAMPFIRE—Role of Hunting Report*, p. 9-19; ZPWMA, Presentation, *Legal Trade, Conservation, and Rural Livelihoods: A Zimbabwean Perspective* (Dec. 2016), p. 20-22. *See also CAMPFIRE—Role of Hunting Report*, p. ii (in the period 2009-2015, "96 human lives were lost to wildlife attacks, with elephant accounting for more than half of those deaths. Yet despite these challenges, communities still retain a high level of tolerance for elephants, but this support is rapidly dissipating as a result of the loss of income from trophy hunting. This places almost two million ha of land at risk, including the risk of increasing retaliatory killing through poisoning and illegal wildlife crime.").

[72] Chief Sen. D. Chisunga, *Land Use Planning at the Local Level*, Presentation at the 14th African Wildlife Consultative Forum (Nov. 10, 2015).

[73] *CF Dec. 2014 Comment*, p. 3-7 (citing Charlton McCallum Safaris, Elephant Hunting in Mbire District – A Perspective of the Private Sector (Nov. 17, 2014) & related attachments.

[74] Please see attached Index of Information Submitted.

Reason for Reconsideration 7:
Local Conservation Efforts Effectively Share the Responsibilities of Elephant Conservation

The Denials should be reconsidered because Conservation Force, ZPWMA, SOAZ, and others have provided extensive documentation of the benefits to elephant generated by "local conservation efforts." The FWS does not discuss this information specifically, but it should. This information proves that the contributions of safari operators, anti-poaching units, CAMPFIRE communities, private landholders/conservancies, and associated non-profits are integral to the functioning of Zimbabwe's wildlife management system. They are not "limited" efforts. They are extensive, and reduce the burden on ZPWMA's resources.

As Conservation Force and ZPWMA previously explained, conservation work is ***frequently*** carried out by non-governmental entities in Zimbabwe.[75] The Parks and Wildlife Act Chapter 20:14 devolved Appropriate Authority to private and communal landholders. Through this "government mechanism," the "legal right to utilize and manage wildlife on their property" was transferred to the landholders.[76] Due to this transfer, non-governmental entities such as safari operators, CAMPFIRE district councils, and private conservancies have both the authority and the obligation to protect, conserve, monitor, and benefit from wildlife in their areas.[77] As ZPWMA wrote:

> Fundamentally, ZimParks supports local efforts by providing a conducive legislative and policy environment which allows the private and community sectors to thrive. The grant of Appropriate Authority Status to private properties and Rural District councils is a case in point.[78]

ZPWMA supports local conservation efforts through training, support, and more.

The contributions of non-governmental interest to wildlife conservation are not limited or localized. Taken together, they cover the country.[79] A few examples from the information provided to the FWS are below:

- Lodzi Hunters, in the Northwest Matabeleland and Sebungwe ranges, contributed over $680,000 over two years to CAMPFIRE wards, to improve livelihoods, employ scouts, and increase tolerance of elephant and other species. The operator also maintains a twelve-person anti-poaching team.[80] Similarly, Charlton McCallum Safaris in the Zambezi Valley shares revenues with Mbire CAMPFIRE wards and the district council. In two years, the fees shared topped $750,000 (of which $380,000+

[75] *ZPWMA April 2014 Response*, p. 15-16, 23-25; *CF Oct. 2014 Comment*, p. 28 & related attachments; *see also* R. Martin, *Personal Comment: Ban on the Import of Elephant Trophies into the USA from Tanzania and Zimbabwe* (Oct. 2014), p. 6 & attachment, M. Murphree & R. Martin, *Shifting Paradigms, Policy and Processes in Conservation and Development over the Past Four Decades* (2013).

[76] *ZPWMA April 2014 Response*, p. 15-16.

[77] *ZPWMA Dec. 2014 Response*, p. 18-21 ("This arrangement [Appropriate Authority] incentivizes landowners and tenants to not only tolerate wildlife, but to conserve and promote conservation and protection of wildlife…"), p. 25-27 (identifying contributions of safari operators, NGOs, conservancies, communal areas to wildlife conservation).

[78] *ZPWMA April 2014 Response*, p. 25.

[79] Please see attached map, which shows the breadth of these "local" operations.

[80] *CF Jan. 2015 Comment* & related attachments.

went directly to ward accounts) and anti-poaching expenditures topped $150,000.[81] Each of these operators is lessening the government's burden of community support and anti-poaching patrols by committing their private resources to these purposes.

- A small operator, Pro Safaris in the Zambezi Valley, allocates 6% of its turnover for water pumping, water pan installation, and other conservation activities. Pro Safaris maintains a ten-person anti-poaching team to patrol a 40-km international border,[82] which allows ZPWMA rangers to focus on patrolling the national park instead of the Safari Area.
- The Tashinga Initiative is a non-profit in the Zambezi Valley that obtains anti-poaching equipment, coordinates anti-poaching efforts, and organized the Sebungwe elephant management planning workshop. The Tashinga Initiative is supported by local safari operators (hunting and photo), and international donors like the Houston Safari Club.[83]
- Also in the Zambezi Valley/Sebungwe range, Martin Pieters Safaris maintains three patrol teams, and are helping develop a community-owned conservancy with two additional patrol teams. The company teams have recovered 15,000+ snares since 2007, and their nearly 300 patrols support ZPWMA's monitoring in this area. The community scouts were intensively trained by the operator teams. These scouts cooperate with ZPWMA against poaching in the Omay and Gokwe communal lands.[84]
- Save and Bubye Valley Conservancies in the Southeast Lowveld range each spend over $500,000 annually on anti-poaching and invest another $200,000+ in nearby villages. The conservancies do not draw on ZPWMA resources at all. They are wholly responsible (and largely depend on hunting income) to secure a land area about the size of New Jersey, the world's third-largest black rhino population, and an elephant population that exceeds 2,000.[85]
- CAMPFIRE communities monitor poaching losses and PAC off-take. They collaborate with ZPWMA to detect poaching and have developed a mutual informer network together. They also work with ZPWMA and safari operators to avoid problem animal off-takes and non-destructively deter crop-raiding elephant.[86] Because they have Appropriate Authority, they collaborate with ZPWMA, but do not need to depend on ZPWMA for wildlife management.
- The SOAZ report included data from 14 operators across the entire elephant range. It reported on these operators' monitoring of elephant populations and poaching losses and their anti-

[81] *CF Dec. 2014 Comment*, p. 5-6 & related attachments; *CF Jan. 2015 Comment* & related attachments; CF Email to T. Van Norman forwarding DAPU film (May 9, 2016); CF Emails to T. Van Norman forwarding DAPU Reports (June 15, 2015, May 23, 2016, & Jan. 18, 2017).

[82] *Pro Safaris Report* (2016).

[83] E.g., CF Email to T. Van Norman forwarding information on anti-poaching in the Zambezi Valley and Sebungwe (Nov. 30, 2015); CF Email to T. Van Norman forwarding Tashinga Initiative press release (May 22, 2016); CF Email to T. Van Norman forwarding article on success in building new communications base (Nov. 14, 2016).

[84] Martin Pieters Safaris, *Blog Posts*, publicly available at http://www.martinpieterssafaris.com/blog/.

[85] B. du Preez et al., *Sport-Hunting and Lion (Panthera leo) Conservation in Zimbabwe* (Jan. 31, 2016); B. du Preez, *Bubye Valley Conservancy Lion Research Report* (Jan. 12, 2016); R. Groom, *Hunting in Zimbabwe's Save Valley Conservancy* (Jan. 27, 2013).

[86] *See generally CAMPFIRE Workshop Proceedings*.

poaching investment of almost $1 million in 2013. The 14 companies together employed 245 anti-poaching personnel, and cooperated closely with ZPWMA.[87]

The Finding highlights the Mana Pools elephant management planning workshop. It should also mention the Sebungwe and South East Lowveld workshops. They exemplify the public-private-communal partnership existing in Zimbabwe because stakeholders have Appropriate Authority. The Finding reveals the FWS' misunderstanding of Zimbabwe's conservation system, which requires reconsideration and reversal of the Denials.[88]

Reason for Reconsideration 8: Enhancement has been Shown

The FWS has defined "enhancement" as benefits to the species, such as protection of habitat, generation of conservation and anti-poaching funding, and reduction of human-wildlife conflicts through generation of conservation incentives. The information submitted to the FWS demonstrates that licensed, regulated hunting of elephant in Zimbabwe satisfies this standard. This information shows how hunting justifies the existence of significant elephant range.[89] It substantiates the anti-poaching partnership among ZPWMA, hunting operators, and communities, and demonstrates the success of their efforts (declining PIKE). It shows that communities are incentivized not to retaliate against elephant (low PAC offtakes). It describes the pre-suspension benefits generated for CAMPFIRE communities. The success of Zimbabwe's elephant management is underscored by the fact there are over 80,000 elephants in the country, and significant anti-poaching gains in the border area of the Zambezi Valley.

The FWS demands "enhancement." It has been shown. Sustainable offtakes have been shown. A stable elephant population has been shown. A well-managed and responsive elephant management system has been proven. The continued suspension obstructs this enhancement from reaching the elephant—and the people—of Zimbabwe. We encourage the FWS to stop moving the target. The FWS cannot continue to rely upon a Finding that ignores the facts.

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[87] *SOAZ Report*, p. 4.

[88] The Finding's first sentence is almost verbatim to the July finding, and still fails to respond to CF's objections on this point. We objected that we did not "emphasize the economic impact of the suspension to local conservation efforts," though that information was available in our submissions. The Finding's failure to respond to this objection, and its cutting-and-pasting of prior writing, merits reconsideration; it clearly does not consider the best-available and most current information. Note that the attachments in CF's comment also pointed to data showing "whether and to what extent these individuals would reduce their conservation efforts based on the inability of U.S. hunters to import a sport-hunted trophy," e.g., in the submitted Declarations, Charlton McCallum Safaris and DAPU documents, SOAZ Report, CAMPFIRE Reports, R. Martin Fourth Report, and more. E.g., *CF June 2014 Comment* Attachments; *CF Oct. 2014 Comment* Attachments.

[89] It should be noted that there is far more land secured in areas which allow, and largely rely upon, sustainable use. Compare the approximately 27,000 km^2 of habitat in national parks to the approximately 19,000 km^2 in Safari Areas, ~48,000 km^2 in CAMPFIRE areas, and 7,000+ km^2 in conservancies.

IUCN/UN, Protected Planet, http://blog.protectedplanet.net.

Given all this information, the Applicants request reconsideration, and reversal of the Denials.

Respectfully submitted,

Conservation Force
3240 S. I-10 Service Road W., Suite 200
Metairie, Louisiana 70001-6911
Phone: 504-837-1233
Fax: 504-837-1145
Email: cf@conservationforce.org

CC: Bryan Arroyo
Dr. Rosemarie Gnam

Attachments: Index
USB containing information submitted to the FWS by Conservation Force and ZPWMA
Map of “Local Conservation Efforts”

Index of Information Produced by Conservation Force, ZPWMA, and AfESG
In Support of Re-Opening Import of Sport-Hunted Elephant Trophies from Zimbabwe

Date	Producer	Document
7/2/1997	FWS	Positive enhancement finding
4/4/2014	FWS	First questionnaire to ZPWMA
4/4/2014	FWS	Negative enhancement finding
4/17/2014	FWS	Negative enhancement finding revised
4/17/2014	ZPWMA	Response to April 4, 2014 questionnaire sent to FWS, including all attachments ("ZPWMA April 2014 Response")
5/30/2014	AfESG	Email from H. Dublin to R. Gabel, subject "Clarification regarding Zimbabwe data"
6/6/2014	CF	First comment on April 2014 enhancement finding and publication in the Federal Register, including all attachments ("CF June 2014 Comment")
6/25/2014	CF	Email to T. Van Norman forwarding email from E. Chidziya/ZPWMA regarding National Elephant Management Plan Workshop
7/22/2014	FWS	Negative enhancement finding
10/4/2014	R. Martin	Personal comment and attachments sent to FWS
10/21/2014	CF	First comment on July 2014 enhancement finding, including all attachments ("CF Oct. 2014 Comment")
10/31/2014	FWS	Second questionnaire to ZPWMA
11/3/2014	AfESG	Email from H. Dublin to T. Van Norman attaching AfESG letter/ comment on July finding ("AfESG Nov. 2014 Letter")
11/13/2014	CF	Email to T. Van Norman forwarding invitation to National Elephant Management Plan Workshop
12/1/2014	CF	Email to T. Van Norman forwarding Agenda for Plan Workshop
12/5/2014	CF	Email to T. Van Norman attaching PowerPoint with survey results
12/5/2014	CF	Email to T. Van Norman summarizing outcomes of Plan Workshop
12/10/2014	ZPWMA	Response to October 31, 2014 questionnaire sent to FWS, including all attachments ("ZPWMA Dec. 2014 Response")
12/15/2014	CF	Second comment on July 2014 enhancement finding, including all attachments ("CF Dec. 2014 Comment")
12/16/2014	CF	Email to T. Van Norman forwarding CAMPFIRE Workshop proceedings
12/23/2014	CF	Email to T. Van Norman forwarding national Plan Workshop Proceedings
1/6/2015	CF	Email to T. Van Norman forwarding comments from the authors of the Save Valley Conservancy 2013 survey
1/12/2015	CF	Email to T. Van Norman forwarding invitation to Mana Pools Elephant Management Plan Workshop
1/19/2015	CF	Third comment on July 2014 enhancement finding, attaching Lodzi Hunters and Charlton McCallum Safari documents to substantiate enhancement/community investment ("CF. Jan. 2015 Comment")
1/23/2015	CF	Email to T. Van Norman with comment cover letter
3/3/2015	CF	Email to T. Van Norman forwarding article on ZPWMA anti-poaching success
3/11/2015	CF	Email to T. Van Norman attaching recent CITES/MIKE update

Index of Information Produced by Conservation Force, ZPWMA, and AfESG
In Support of Re-Opening Import of Sport-Hunted Elephant Trophies from Zimbabwe

Date	Producer	Document
3/11/2015	CF	Email to T. Van Norman forwarding invitation to rescheduled Mana Pools Elephant Management Plan Workshop
3/26/2015	FWS	Negative enhancement finding ("Finding")
4/13/2015	CF	Email to T. Van Norman forwarding article regarding effect of FWS suspension on CAMPFIRE
5/4/2015	CF	Email to T. Van Norman forwarding invitation to Sebungwe Elephant Management Plan Workshop
5/4/2015	CF	Email to T. Van Norman forwarding preparatory document for Sebungwe Workshop
5/5/2015	CF	Email to T. Van Norman forwarding study on elephant in the Sebungwe range
5/5/2015	CF	Email to T. Van Norman forwarding Mana Pools Workshop Proceedings
5/8/2015	CF	Email to T. Van Norman forwarding agenda for Sebungwe Workshop
5/11/2015	CF	Email to T. Van Norman forwarding background document on elephant populations in the Sebungwe range
5/12/2015	FWS	Third questionnaire to ZPWMA
5/14/2015	CF	Email to T. Van Norman forwarding fact sheet on Sebungwe Workshop
6/15/2015	CF	Email to T. Van Norman forwarding DAPU First-Quarter Report
7/20/2015	ZPWMA	Response to May 12, 2015 questionnaire sent to FWS, including all attachments ("ZPWMA June 2015 Response")
9/30/2015	CF	Email to T. Van Norman forwarding South East Lowveld Workshop Proceedings
11/30/2015	CF	Email to T. Van Norman forwarding A. Pole/AWF email describing Cabinet subcommittee meeting
11/30/2015	CF	Email to T. Van Norman forwarding email from L. Taylor regarding anti-poaching efforts in Sebungwe range (confidential)
12/1/2015	CF	Email to T. Van Norman forwarding analysis of income to CAMPFIRE districts from licensed, regulated hunting ("CAMPFIRE Income Analysis")
12/3/2015	CF	Email to T. Van Norman forwarding anti-poaching reports in the Mana Pools National Park area
12/7/2015	CF	Email to T. Van Norman attaching two presentations, one made by the CAMPFIRE Association and one made by Chief Chisunga of the Masoka Ward in the Mbire District
1/5/2016	CF	Email to T. Van Norman forwarding information about anti-poaching in the Zambezi Valley (confidential)
2/22/2016	CF	Email to T. Van Norman attaching article regarding ZPWMA ant-poaching success
2/24/2016	CF	Email to T. Van Norman including link to video regarding Bubye Valley Conservancy
2/29/2016	CF	Email to T. Van Norman forwarding final print of National Elephant Management Plan ("Plan")

Index of Information Produced by Conservation Force, ZPWMA, and AfESG
In Support of Re-Opening Import of Sport-Hunted Elephant Trophies from Zimbabwe

Date	Producer	Document
4/20/2016	CF	M. Pieters Blog Posts
4/20/2016	CF	Pro Safaris Report
4/20/2016	CF	B. du Preez, Bubye Valley Conservancy Lion Research Report
4/20/2016	CF	R. Groom, Hunting in Zimbabwe's Save Valley Conservancy
4/20/2016	CF	B. du Preez et al., Sport-Hunting and Lion (*Panthera leo*) Conservation in Zimbabwe
4/25/2016	CF	Email to T. Van Norman attaching article "Muchinguri speaks on Tsholotsho Jumbo ban"
5/2/2016	CF	Email to T. Van Norman attaching article on continued losses in Zimbabwe's hunting sector due to the FWS suspension
5/9/2016	CF	Email to T. Van Norman including link to video describing Charlton McCallum Safaris/DAPU's anti-poaching successes
5/9/2016	ZPWMA	Email to T. Van Norman attaching letter explaining use of elephant hunting funds
5/22/2016	CF	Email to T. Van Norman attaching press release for Houston Safari Club grant to the Tashinga Initiative
5/23/2016	CF	Email to T. Van Norman forwarding DAPU's First Quarter Report
7/18/2016	CF	Email to T. Van Norman forwarding email from D. Cumming confirming "go-ahead" to prepare Supplemental Plan
7/19/2016	CF	Email to T. Van Norman forwarding Mana Pools MIKES site information
9/19/2016	CF	Email to T. Van Norman forwarding article about CAMPFIRE review
9/2016	AfESG	AfESG African Elephant Status Report 2016
11/9/2016	ZPWMA	Email to T. Van Norman attaching requested Plan prioritization and Supplemental Plan
11/14/2016	CF	Email to T. Van Norman forwarding article describing anti-poaching efforts by the Tashinga Initiative in the Zambezi Valley
12/27/2016	CF	Email to T. Van Norman forwarding presentation by ZPWMA Elephant Coordinator
1/18/2017	CF	Email to T. Van Norman forwarding DAPU End-of-Year Report
2/1/2017	CF	Email forwarding anti-poaching report reflecting implementation of the Mana Pools/Zambezi Valley regional elephant management plan
3/6/2017	CF	Email forwarding status of Zimbabwe responses to FWS requests
4/6/2017	CF	CAMPFIRE Association, The Role of Trophy Hunting of Elephant in Support of the Zimbabwe CAMPFIRE Program
4/6/2017	CF	CITES/MIKE, Levels and Trends of Illegal Killing of Elephants in Africa to 31 December 2016

Note: This list is not and is not intended to be a complete record of the FWS' Zimbabwe elephant file. The FWS undoubtedly received information not listed here, including at least two information productions by Safari Club International. We believe that the FWS has received direct communications from applicants for import permits, safari hunting operators, ZPWMA, and others.

ATTACHMENT

Letter Denying Request for Reconsideration

United States Department of the Interior

FISH AND WILDLIFE SERVICE

International Affairs
5275 Leesburg Pike, MS: IA
Falls Church, VA 22041-3803

MAY 16 2017

In Reply Refer To:
FWS/AIA/DMA/PRT– 04846C

Mr. Richard [redacted] Bonander
[redacted]
Casper, Wyoming [redacted]

Dear Mr. Bonander:

This letter responds to your April 6, 2017, letter from your representative, John J. Jackson, III, requesting reconsideration of the February 23, 2017, decision to deny your application for a permit to import a personal sport-hunted African elephant (*Loxodonta africana*) trophy taken on March 21, 2015, in Zimbabwe. After a thorough review of Mr. Jackson's response on your behalf, it is my decision to uphold the original denial of your application.

As you know, the African elephant is listed as threatened with a special rule under Section 4(d) of the U.S. Endangered Species Act (Act)[1]. Under the special rule, issuance of an import permit for a sport-hunted trophy can only occur if the U.S. Fish and Wildlife Service (Service) finds that the killing of the trophy animal would enhance the survival of the species, and the trophy is accompanied by a threatened species permit. To enhance the survival of the species, the importation must be associated with activities that provide a direct or indirect benefit to the species in the wild.

At the time you originally applied for a permit, the Service had reviewed the best available scientific and management data, including information made available to the Service by Zimbabwe Parks & Wildlife Management Authority (ZPWMA), Conservation Force, and Safari Club International, in evaluating the status of Zimbabwe's elephant management program at the time you conducted your hunt. Based on this material, the Division of Management Authority (DMA) made a finding on March 26, 2015, that we were unable to find that the import of an elephant trophy taken during the 2015 hunting season would meet the requirements of the Act and the special rule for African elephant. Mr. Jackson's April 6, 2017, letter asked that the Service reconsider your application, in part, based on his assertion that the enhancement finding failed to consider significant information submitted by Conservation Force, ZPWMA, and others, both before and after the finding was made, that would lead to a reversal of the Service's negative finding.

Regarding Mr. Jackson's assertion that the Service failed to consider significant information submitted by Conservation Force and ZPWMA when making its determination, the Service has taken into consideration all of the information available to the Service regarding elephant hunting

1 The text of this Act can be found by using the search bar at the top of the following web page: http://Go.USA.Gov/xr6dd.

in Zimbabwe at the time your hunt occurred (March 21, 2015). While Mr. Jackson's request for reconsideration included additional information that was not available to the Service at the time the March 26, 2015, finding was made, most of the information documented activities and actions that occurred after the conclusion of your hunt. While this new information may be relevant to hunts that occurred after our March 26, 2015 finding, it does not demonstrate that the situation in Zimbabwe, at the time of your hunt, was different than previously considered by the Service and would result in a revision of the March 2015 finding. Therefore, I am upholding the original denial of your application.

As provided in 50 CFR 13.29(e)[2], you may appeal to the Director of the Fish and Wildlife Service, through this office: Division of Management Authority, Branch of Permits, MS: IA, 5275 Leesburg Pike, Falls Church, Virginia 22041-3803. This appeal must be in writing with the original signature of the person requesting an appeal or of that person's legal representative, should refer to your file number, PRT-04846C, and must be submitted to this office within 45 calendar days of the date of this letter. The appeal must state the reason(s) and issue(s) upon which the appeal is based. Your written appeal must address how the decision to deny the reconsideration of your request was based on a misinterpretation of the information provided in your request for reconsideration, or it must present a clarification of this information. **Should you supply new information that changes the content of your original request for reconsideration, you must submit a new application to this office before such information can be considered.**

If you have any questions, please contact Supervisory Policy Specialist Michael S. Moore of this office: Division of Management Authority, Branch or Permits, MS:IA, 5275 Leesburg Pike, Falls Church, VA 22041-3803 (703-358-2104, ext. 1983).

Sincerely,

Craig Hoover, Chief
Division of Management Authority

2 The text of this regulation can be found by using the search bar at the top of the following web page: http://Go.USA.Gov/xYDUk

ATTACHMENT

March 26, 2015 Negative Enhancement Finding

United States Department of the Interior

FISH AND WILDLIFE SERVICE
Washington, D.C. 20240

In Reply Refer To:
FWS/AIA/DMA

Memorandum

To: The File

From: Chief, Branch of Permits

Date: MAR 26 2015

Subject: Enhancement Finding for African Elephants Taken as Sport-hunted Trophies in Zimbabwe On or After January 1, 2015.

The African Elephant (*Loxodonta africana*) is listed as threatened under the U.S. Endangered Species Act (ESA) and is regulated under an ESA section 4(d) special rule [50 CFR 17.40(e)]. The 4(d) special rule gives the requirements for the import of sport-hunted trophies. Under paragraph 17.40(e)(3)(iii)(C), in order for the U.S. Fish and Wildlife Service (Service) to authorize the import of a sport-hunted elephant trophy, the Service must make a finding that the killing of the animal whose trophy is intended for import would enhance the survival of the species in the wild. In evaluating the available data on elephant hunting in Zimbabwe, the Service has determined that it is unable to make a finding that the killing of elephants in Zimbabwe, on or after January 1, 2015, whose trophies are intended for importation into the United States, would enhance the survival of the African elephant in the wild. Therefore, the trophies, part or products, of elephants taken in Zimbabwe during the 2015 hunting season and future hunting seasons, will not be allowed to be imported into the United States. The suspension on importation of trophies taken during calendar year 2015 or future hunting seasons 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.

General considerations:

As stated in previous findings, in evaluating whether the killing of the animal whose sport-hunted trophy is intended for import into the United States contributes to the enhancement of African elephants within a country, the Service looks at a number of factors. We evaluate whether a country has a valid national or regional management plan and if the country has the resources and political will to enact the plan. If there is a plan, what government entities

implement the plan and how often is it reviewed and updated? Does the plan have clear, achievable objectives? Are the objectives measurable and are they being achieved? Is there an adaptive management approach within the plan so that enacting agencies can quickly respond to changing environmental or social issues?

The Service also evaluates the status of the elephant population within a country and trends over time. Particularly, we are interested in population numbers, sex and age-class distribution, and mortality rates (both natural and human-induced). Are standardized surveys being conducted and, if so, what are the timing, census methodology, and coverage? Since elephant populations can move across international borders, what level of cooperation is there between neighboring countries in management and surveying efforts for shared populations? How is poaching accounted for within survey efforts?

The Service takes into account all forms of offtake when evaluating population viability and sustainability, including human-elephant conflicts, problem animal control, poaching, and sport-hunting. While recognizing that there may be limited resources available for elephant management, the Service considers what national policies are in place to address human-elephant conflicts and problem elephant control. Is there a policy on culling surplus animals and removal of nuisance animals? Does domestic harvesting of elephants occur for local consumption or use? The amount of protected area either set aside for elephants or managed for elephant populations and the level of protection provided are also important in the Service's evaluation of whether imports of trophies could be authorized.

Finally, the Service considers the country's sport-hunting program and whether it contributes to the conservation and management of the species. Is the hunting program scientifically based and has it been incorporated into national/regional management strategies, particularly in light of data on population numbers and trends and levels of utilization (both legal and illegal)? Are the funds generated by hunters going directly to in-situ conservation and management efforts or deposited into a general treasury fund? How are hunting quotas distributed? If there are concession areas, how are they managed and allocated? Do U.S. hunters, through their participation in the hunting program, contribute sufficient funds to address management needs of the species, and are those funds utilized in a meaningful manner?

In short, the Service is looking to determine if a country has sufficient numbers of elephants to support a hunting program, if the country has a management plan and adequate laws and regulations to effectively implement a hunting program, and if the participation of U.S. hunters in the program provides a clear benefit to the species to meet the requirements for the import of sport-hunted trophies under paragraph 17.40(e)(3)(iii)(C).

Basis for Finding for Zimbabwe:

In the April 4, 2014, finding, and the revised finding of April 17, 2014, the Service stated that it was unable to make a positive finding to allow imports, primarily due to the limited information available to the Service at that time. On April 4, 2014, the Fish and Wildlife Service sent a letter

to the Zimbabwe Parks & Wildlife Management Authority (ZPWMA) with a series of questions that would assist the Service in making a final determination on trophy imports. On April 14, 2014, the Director-General of ZPWMA sent a letter to the Service expressing concerns over our decision to establish a temporary suspension. On April 17, 2014, the Director-General sent a response to the Service inquiry. Several weeks later, the Service received a number of documents, including copies of Zimbabwean laws, and other items referenced in the ZPWMA response. In addition, on June 6, 2014, the Service received additional information from Conservation Force, a U.S.-based conservation and hunting non-governmental organization (NGO). In its July 17, 2014 finding, as revised on July 22, 2014, the Service stated that it continued to be unable to make a positive finding to allow imports. Since that time, the Service has received a number of comments from individuals and associations connected to the hunting industry in Zimbabwe or southern Africa. On October 21, 2014, the Service received additional comments from Conservation Force. Further information was provided by Conservation Force on January 19, 2015. After reviewing this information, the Service delivered a second letter, dated October 31, 2014, to ZPWMA while attending the 13th Annual African Wildlife Consultative Forum in Ethiopia. This letter requested clarification of information submitted to the Service, and also requested additional information to address questions that were raised from our review of available information. The Service received a response to this inquiry on December 10, 2014. Safari Club International also provided supplemental information on December 17, 2014, and January 23, 2015. This finding is the result of an analysis of all of this information. Based on the information available to the Service, we are unable to make a finding that the killing of elephants in Zimbabwe, on or after January 1, 2015, whose trophies are intended for importation into the United States, would enhance the survival of the African elephant in the wild. As noted above, the suspension on importation of trophies taken during calendar year 2015 or future hunting seasons could be lifted if additional information on the status and management of elephants in Zimbabwe becomes available which satisfies the conditions of the 4(d) special rule under the ESA.

Management Plans: In its April 4, 2014, letter, the Service asked whether Zimbabwe had a current national management plan for elephants. In the ZPWMA response, Zimbabwe responded that the "management plan" consisted primarily of The Policy and Plan for Elephant Management in Zimbabwe (1997) and Elephant Management in Zimbabwe, third edition (July 1996). In addition, ZPWMA stated that they also implement other plans: "The African Elephant Action Plan" (CoP15 Inf. 68), SADC Protocol on Wildlife, and Elephant and Rhino Security Plan. In the ZPWMA response, ZPWMA stated that all of the protected areas in Zimbabwe have "specific aspects of elephant monitoring programs that are implemented and reviewed on an annual basis". ZPWMA stated that information on the status of the elephant is derived from aerial surveys, water hole counts, walking transects, visitor observation, and ranger-based monitoring. In addition, ZPWMA stated that they are regularly monitoring the status of the elephant population, including poaching, at two sites through the CITES "Monitoring the Illegal Killing of Elephants" (MIKE) program.

According to their initial response, ZPWMA is the sole legal authority, under the terms of the Parks and Wildlife Act, Chapter 20:14, for administering the management plans and overall

management of elephants in Zimbabwe. Through an adaptive management approach, ZPWMA stated that aspects of the elephant management plan are "reviewed through annual stakeholder consultative national workshops" with government, NGO, local community, safari operator, and private sector participation.

Elephant Management in Zimbabwe provides a historical review of elephant status in Zimbabwe prior to 1996. The document also identifies three major management goals for ZPWMA: maintain at least four demographically and genetically viable populations; maintain numbers and densities below levels that will not compromise biodiversity; and maintain or increase elephant range at or above 1996 levels. However, the document primarily focuses on intentional reduction of elephant populations through culling rather than on maintenance or increase of populations under threat. While the Service recognizes the potential role of culling as part of a management program, Elephant Management in Zimbabwe is largely irrelevant since it does not establish specific measurables or management actions that need to be taken. Instead, it largely presents a philosophical discussion of the merits of culling and efforts that must be taken to ensure that culls meet the desired management results. The document did make one relevant statement that when managing elephant males for sport hunting, it is essential to account for all adult males removed from a population, including animals taken through problem animal control and poaching. The document goes on to state that the "sport hunting quota should be reduced, to zero if necessary, if more than 0.75% of the populations [per annum] is being killed in other ways."

The Policy and Plan for Elephant Management in Zimbabwe was the outcome of a "Zimbabwe Elephant Management Framework" workshop held on January 13, 1997, in Harare. The document summarizes the issues that were affecting elephant populations in Zimbabwe at the time, and recommended policy statements on elephant management. While the document states a clear goal and establishes ten objectives with management actions identified, it does not sufficiently expand on any methodology to meet the objectives or complete management actions. Without a plan to take specific actions to meet the objectives, or at least a clear framework on how adaptive management efforts would be monitored to ensure that they are meeting the stated objectives, it is not clear to the Service how this document could serve as a "management plan". Given the general nature of the stated objectives, it could be stated that the objectives and, possibly, the management actions of this 1997 document are still valid, but without specific measurable outcomes identified to implement these goals and actions, the document is insufficient to address the management of elephants. Further, while the material received from Conservation Force and the ZPWMA in response to the Service's April 4, 2014, and October 31, 2014, inquiries provided some information related to the objectives, the Service has not received sufficient information to indicate, since the inception of this document in 1997, which objectives are being met or how they are being met.

Other documents provided by ZPWMA in response to our inquiries, e.g. "The African Elephant Action Plan" (CoP15 Inf. 68), SADC Protocol on Wildlife, and Elephant and Rhino Security Plan also establish broad policy goals and objectives, but provide very little with regard to specific management actions or measurables. At a December 2014, three-day workshop, hosted by ZPWMA, to review Zimbabwe's Elephant Conservation Policy and Management Plan, the participants discussed the SADC Protocol, which went into effect in 2003. According to the

information from this workshop, the participants felt that the protocol was a good framework for Southern African countries to work together on law enforcement and anti-poaching efforts. It is not clear, however, how successful Zimbabwe has been in implementing this protocol (limited information has been provided supporting or refuting Zimbabwe's implementation of the Plan). The Zimbabwe Policy for Wild Life is a general framework, published in November 2000, on how ZPWMA would be managed to ensure that Zimbabwe's wildlife and their habitats are appropriately managed. This document specifically acknowledges that "[I]t is intended that [this] policy will be followed by detailed management plans and enabling legislation for those issues which merit them." It is not clear if detailed management plans for elephants have not been developed because ZPWMA does not believe that elephants merit such plans, or if detailed plans have been developed, but were not provided to the Service.

Finally, the National Environmental Policy and Strategies, published in June 2009, is a general policy framework for all environmental issues in Zimbabwe. The document, while addressing ways to maintain environmental integrity, social issues, economic issues, and environmental management, establishes "guiding principles" and "strategic directions" for addressing biodiversity (Guiding Principle #9 and 10), flora (#11 and 12), fauna (#13), genetic resources (#14), protected areas(#15), natural resource management (#43), and wildlife and fisheries (#45). However, these guiding principles and corresponding strategic directions are only broad guidance and do not identify any specific management activities.

Without a management plan or plans, or other guiding document, with specific, measurable goals and actions, it is very difficult for the Service to determine if ZPWMA is implementing the well-articulated, but general, goals and objectives that appear in Elephant Management in Zimbabwe, The Policy and Plan for Elephant Management in Zimbabwe, and other Zimbabwean policy documents. It should also be noted that both elephant management plans are more than 15 years old.

In several documents available to the Service, ZPWMA stated that they do not have a proscriptive management plan because they utilize an adaptive management approach to elephant conservation and management. However, no information has been provided that indicates how this adaptive management approach is carried out. While the Service acknowledges the value of such an approach generally, a clear framework or guidance would be necessary to ensure consistent implementation on a national basis. Even if the documents mentioned above were the overarching guidance for the country and adaptive management was carried out independently for each of the four subpopulations (North West Matabeleland, Zambezi Valley, Sebungwe, and Gonarezhou (or South-East Lowveld)), it would stand to reason that each subpopulation would need guidance that is more specific. In both of the ZPWMA responses to the Service, they spoke of "devolving wildlife management authority to local branches, private conservancies, and CAMPFIRE's RDC [rural development councils]". The Service does not disagree with a regional or local management approach, however, since the Service has been informed that elephants in Zimbabwe are managed at a national level, there needs to be a national approach and understanding of the basis of this adaptive management and that the country, as a whole, is taking a logical, scientifically based approach to reaching the agreed upon end result.

In December 2014, ZPWMA hosted a three-day workshop at Hwange Safari Lodge in Zimbabwe to review Zimbabwe's Elephant Conservation Policy and Management Plan. The workshop was attended by the ZPWMA Director General, the Permanent Secretary for Environment, Water and Climate, members of the Zimbabwe Parks and Wildlife Board, Executive Directors of Rural District Councils, and various NGOs. Both the Permanent Secretary and the Director General acknowledged at the workshop that the 1997 management plan was outdated and has been overtaken by events at the global, regional, and local level and cannot address current challenges.

The workshop participants agreed on a framework for the upcoming management plan. The proposed revised management plan has the same long-term vision of the 1997 plan and basically the same target goals (i.e., maintain at least 4 demographically and genetically viable populations; maintain or increase elephant range; maintain numbers/densities of elephants at levels that do not adversely impact biodiversity conservation goals while contributing to economically viable and sustainable wildlife-based land uses). The workshop participants identified the beginnings of strategic objectives and outputs, as well as some key activities. The outcome of the workshop appears to be a starting point for reevaluating the current management plan(s). However, according to the Proceedings, there was insufficient time at the workshop to complete the section on means of verifying the key performance indicators. A schedule was agreed upon: by Dec. 15, 2014, ZPWMA would appoint a drafting team to write up the management plan; the 1st draft of the plan would be ready by Jan. 30, 2015; the Elephant Management Plan Coordinating Committee would be convened by ZPWMA by Feb. 28, 2015; Final draft of management plan by April 30, 2015; and Operational annual management plans for 4 sub-regions by May 30, 2015.

Overall, ZPWMA has not provided, and the Service has not otherwise received, any information regarding the 2014 or future hunting seasons that indicates that Zimbabwe is implementing appropriate management of the national elephant population. While the Service does not have adequate information to conclude that the current management regime is sufficient to meet the criteria under 50 CFR 17.40(e)(3)(iii)(C), a revised national plan that includes specific goals and measures with specific actions to be taken is a necessary first step towards a re-evaluation of this finding in the future.

Population Status: To manage any population to ensure an appropriate population level and determine whether sport-hunting is having a positive effect, it is vital to have sufficient data on population numbers and population trends to base management decisions. Elephant Management in Zimbabwe states that sport-hunting quotas should be reduced or eliminated if the overall offtake of male elephants, from all sources, is greater than 0.75% of the total population per annum. Without current population data, it is not clear how one can calculate the number to offtake. Without information on population demography and mortality, it is not possible to determine accurately what impact hunting, in conjunction with other offtakes, including problem animal control and poaching, is having on Zimbabwe's elephant population. However, Rowan Martin, author of this document, stated in comments submitted to the Service that he wished he could "disavow one's own writing". Dr. Martin stated that "It [the document] is correct in saying that close attention should be paid to problem animal control and illegal hunting…[but] my current thinking is that trophy hunting should continue regardless and the management thrust should be on reducing illegal hunting and problem animal control. A well-functioning trophy hunting industry

could be the one factor that reduces number of elephants killed illegally and as problem animals." While the Service agrees that a well-functioning hunting industry can provide financial benefits, we also believe that a clear understanding of all off-take is necessary and hunting should not continue without adequate population data.

At the time the Service made its April and July 2014 findings, we relied heavily on population information in the IUCN SSC African Elephant Database report "2013 Africa". According to this this report, the elephant population in Zimbabwe in 2007 was estimated to be 99,107, of which 85% (84,416) was classified as "definite", although less than 1% of these animals were identified by aerial or direct counts, and only 0.3% (291) was classified as "speculative". While the total population in 2012 was estimated at 100,291, only 47% (47,366) was classified as "definite" and 45% (45,375) was classified as "speculative". Only 304 "definite" animals were counted by aerial or ground counts (less than 1% of the definite animals), while 41,840 of these animals were counted through sample counts or dung counts, a less accurate methodology than properly conducted aerial surveys, and the remaining 5,222 were estimated through "other guesses". According to this report, 23 of 40 population estimates included in 2012 are older than 10 years, undermining the quality of the data. Further, according to the report, only eight of the 40 estimates used in the "2013 Africa" report were the result of repeated surveys. As noted in that report, "this lack of systematic and updated monitoring data is of serious concern for possibly the third largest elephant population in Africa." However, in a November 3, 2014, letter to the Service, the IUCN/SSC African Elephant Special Group stated that data had been inadvertently left out of the 2013 provisional report. Specifically, a 2007 survey of Hwange National Park was left off, although it was recorded under "New Surveys" on their website. The results of this survey would have added an additional 30,000 elephants to the "definite" category (from the "speculative" category), while not changing the overall population estimate. Nonetheless, the majority of surveys that contributed to the overall population estimate of 100,291 were more than 10 years old. Given the current circumstances in Zimbabwe and across the continent (e.g., poaching, habitat loss, human population expansion), this information is outdated and cannot be relied upon to show the current status of elephants.

In 2012-2013, according to information provided by ZPWMA, two surveys were conducted in Save Valley Conservancy and in Gonarezhou National Park (and surrounding areas). In Aerial Survey of the Larger Herbivores, Save Valley Conservancy, Zimbabwe, a report compiled in September 2013 by the Technical Advisory Committee of the Save Valley Conservancy, 1,538 elephants were counted. Based on nine years of aerial surveys (2004-2010 and 2012-2013), not all of which covered all of the Save Valley Conservancy, there does appear to be a short-term increase in elephant population density of 9.5%. However, trend analysis of the last three aerial surveys indicated only a 2.2% population increase in elephants. Further, the 2012-2013 surveys were only partial surveys and conditions were such that some double counting may have occurred.

In October 2013, additional aerial surveys were conducted in Gonarezhou National Park, Malapati Safari Area, and adjacent communal lands. From these surveys, it was estimated that there were 10,151 elephants in the Gonarezhou National Park area, the highest estimate since sample surveys began there in 1975. The estimated total number of elephant carcasses in the entire survey was 513. The "1+2" carcass ratio (fresh carcasses (category 1) and recent carcasses (category 2)),

however, was 0.39% in the entire survey area. The Service recognizes that the apparent elephant population increase in Gonarezhou National Park is excellent news. However, a carcass ratio of less than 4%, which is the expected carcass level due to natural mortality alone, is low. This low number could be an indication that the aerial survey method did not accurately detect all carcasses.

In 2014, the Pan African Aerial Elephant Survey (http://www.greatelephantcensus.com/) was carried out over a significant portion of the elephant's range in Africa. Preliminary results from the Pan African survey report a provisional estimate for elephant abundance in Zimbabwe to be between 82,000 and 83,000 individuals. This represents a 6% decline since 2001 surveys. This decline in elephant abundance is important when compared to 5% increase in elephant abundance per annum during the time period immediately prior to the 2001 survey. This overall downward decline in elephant abundance in Zimbabwe is troubling, as an example if elephant abundance in Zimbabwe was predicted to be 99,107 in 2007 and had a constant growth rate of 5% per annum, the Zimbabwe population would be predicted to exceed 139,454 by 2014.

Figures presented at the 16th Meeting of the Conference of the Parties to the Convention on International Trade in Endangered Species of Wild Fauna and Flora in Bangkok, Thailand, March 3-14, 2013 (CoP16 Doc. 53.1) indicated that, during 2002 – 2010, the percentage of illegally killed elephants (PIKE) in the Chewore area (Mana Pools and Chewore Safari Park) Zimbabwe was circa .24, whereas in 2011 that number jumped to .67. A PIKE level of 0.5 or higher (half or more of all carcasses were the result of illegally killed elephants) means that the elephant population is very likely to be in net decline. At the 65th meeting of the Standing Committee, updated PIKE data were provided for Zimbabwe (SC65 Inf.1). PIKE numbers from the two MIKE sites in Zimbabwe showed an increase in 2012 to 0.79 (out of 43 carcasses found) and 0.27 (out of 52 carcasses found). In 2013, the PIKE rates reported for the same two sites were 0.4 (91 carcasses found) and 0.22 (36 carcasses found). From these data, it appears that there was an increase in elephant poaching in 2012, but the poaching level might have declined in 2013 to below the 2011 level. According to the preliminary results from the Pan African Aerial Survey, carcass counts in Mid Zambezi Valley were estimated at 553 (4.3% of live population); Sebungwe had an estimated 1,424 (28.2%). North West Matabeleland was estimated at 4,087 (7.6%) and Gonarezhou National Park at 523 (4.6%) carcasses. There are no estimates available as to the proportion of these carcasses that were the result of poaching.

Regulations and Enforcement: The regulatory mechanisms for ZPWMA and its programs have been established under the Parks and Wild Life Act. This law includes sections on virtually every aspect of ZPWMA, including requirements for annual financial audits and reporting to the central government. The law also provides for substantial penalties for the unlawful possession of or trading in ivory. The first offense carries a minimum of 5 years and a maximum of 15 years in prison. The second offense carries a minimum prison term of 7 years and a maximum of 15 years. However, according to the response from ZPWMA to our April 4, 2014, inquiry, the General Laws Amendment Act (No. 5) of 2010 provides for a mandatory imprisonment of not less than nine years for poaching. If properly enforced, it appears these penalties would be a sufficient deterrent to poaching. However, we did not receive any information on the number of poaching crimes that are prosecuted nor the average sentence or penalty.

In January 1996, the Government of Zimbabwe approved the establishment of the Parks and Wild Life Conservation Fund, a statutory "Fund" that provides for financing wildlife operations directly from revenues generated through wildlife related activities. However, only revenues generated through sport-hunting conducted on state and private lands are used to finance ZPWMA; to our knowledge, no other government funding is provided, and only limited outside funding from NGOs or other governments appears to be available. The 1997 CITES Panel of Experts raised concerns as to the status of ZPWMA relating to its weak financial base, lack of management skills, inadequate and old equipment, and poor infrastructure. While the concerns raised by the Panel of Experts are dated, no new information was provided by ZPWMA or other sources regarding these concerns in response to the Service's April 4, 2014, inquiry.

Based on their December 10, 2014, letter, ZPWMA has a current operating budget in excess of US$28 million. In 2013, ZPWMA reported having revenues of US$29 million against expenditures of US$26 million. According to the letter, "...except for activities like game water supplies in Hwange NP and aerial surveys, there is no budget specifically to manage elephant because ZimParks takes a holistic approach to conservation of all wildlife resources including elephants." ZPWMA also stated that elephant hunting contributes in excess of US$14 million annually and that approximately 30% of ZPWMA's revenue is from hunting, of which the elephant is the major contributor. Besides these statements, however, we do not have adequate information about how much money is generated by elephant hunting, how these funds are distributed, or how these funds impact the ability of ZPWMA to adequately enforce the Parks and Wild Life Act, day-to-day management, or anti-poaching efforts.

That being stated, the Service received documents written by Rowan B. Martin entitled "Ban on Import of Elephant Trophies into the USA from Tanzania and Zimbabwe: Costs of Protection of Elephant Areas." The undated documents discussed the budget requirements for protecting wildlife areas in Zimbabwe based on calculations developed by Mr. Martin in 1996 and 2004. The documents stated that for Zimbabwe, given the total elephant range within the areas controlled by ZPWMA, the annual budget required to protect the elephant range would be US$21 million. In 2013, ZPWMA requested $28 million from the Treasury, the major part of which was intended for anti-poaching efforts. They were allocated only $1.5 million. According to Martin, this amount, along with the revenue from trophy hunting licenses, is not sufficient to provide the needed level of protection for land under ZPWMA's authority. However, in their December 10, 2014, letter, ZPWMA stated that they did not accept Dr. Martin's evaluation and did not consider it accurate. Dr. Martin also presented at the December workshop on this issue. According to the proceedings from the workshop, Dr. Martin suggested that ZPWMA would need US$5,275,480 to protect the National Parks, US$7,055,268 to protect safari areas, and US$3,891,536 for forest areas annually. In addition, communal lands would need US$6,101,101 and private land $3,826,770. Since we have not received a communication from ZPWMA since their December 10, 2014, letter, it is unclear if they agree or disagree with these numbers.

In evaluating the resources available to ZPWMA and their ability to implement regulations and enforcement, we also considered documents from recent Meetings of the Conference of the Parties to CITES. At the 15th Meeting of the Conference of the Parties to CITES, a report on the Elephant Trade Information System (ETIS) was presented (CoP15 Doc. 44.1 Annex). In the report,

Zimbabwe was specifically identified with regard to illicit ivory trade. The report noted the existence of organized criminal activities within Zimbabwe, including reports of the involvement of politicians, military personnel, and Chinese nationals in illicit wildlife trade. The report goes on to state that the law enforcement effort ratio within the countries grouped for the analysis had dropped to 40%, a decline of 4% from the CoP14 analysis. This decline indicates a less than average performance and was attributed to the situation in Zimbabwe.

At the 16th Meeting of the Conference of the Parties to CITES, the report on ETIS (CoP16 Doc. 53.2.2) expressed concerns about Zimbabwe with regard to illegal trade in ivory. The report stated that, as a group, Zimbabwe, Botswana, and Namibia were in the middle range, when compared to 64 other consumer or producer countries of elephant ivory, in terms of the mean number of seizures identified, but ranked fifth in the measure of scale, indicating that most of the seizures were in the 10-100 kg class (i.e., an average number of seizures that were predominately smaller in size). The report noted that 65% of the ivory trade between 2006 and 2011 had occurred since 2009, indicating that illegal ivory trade is increasing. Governance indicators were mixed, with a much lower than average World Bank "rule of law" score, but the second highest law enforcement ratio of any group of countries evaluated. The report, however, supports the Service's governance concerns by specifically identifying Zimbabwe as pulling these scores down in both cases, "especially in the 'rule of law' score, indicating that far greater challenges exist in that country." The report also noted that Zimbabwe was the source of nearly two tons of worked ivory seized in Cape Town, South Africa, in 2009.

In several letters sent to the Service by Zimbabwean safari outfitters and hunting guide organizations, it was stated many times that the presence of hunters, specifically U.S. hunters since they appear to make up the vast majority of sport-hunters in Zimbabwe, and subsequently the professional hunters and safari outfitters guiding the hunters, are the major deterrent to poaching in Zimbabwe. Several specific incidents were reported where safari outfitters and hunters, and not the ZPWMA rangers, thwarted poachers. In at least one incident, the 2013 Hwange National Park poisoning, it was reported that the safari outfitter paid for all of the anti-poaching efforts, including paying for all transportation for the ZPWMA rangers and feeding them. We would expect that the presence of anyone in the field, particularly armed hunters, could deter poachers from carrying out illegal activities where the likelihood of being captured is heightened. However, no evidence was presented to the Service that supports the belief that, without hunters, specifically U.S. elephant hunters, poaching in Zimbabwe would significantly increase. Based on the information provided, we believe that it is not likely that legal hunting for elephants or other wildlife is widespread enough or at a high enough density level to reduce significantly poaching levels in and of itself. This is particularly true for national parks, where hunting is not allowed.

Various statements about trophy hunters and outfitters being a major deterrent to poaching raise concern about existing ZPWMA funding levels and funding utilization. First, concerns center on the ability of ZPWMA to generate sufficient funds to support adequately their stated mission. Secondly, there is concern about ZPWMA's ability to utilize existing funding to support on-going activities. Without additional information on ZPWMA's funding sources (or income) and operating expenses, the Service is unable to determine if Zimbabwe has adequate resources to

enforce existing laws and regulations.

Even with the revised December 10, 2014, information regarding the current ZPWMA budget, we continue to lack sufficient information regarding funding levels or any indication that the financial base, management skills, equipment, or infrastructure have improved. It is possible, of course, that recent and upcoming events, such as the Hwange meeting in December 2014 and other meetings scheduled for early 2015, may lead to a clearer understanding of funding levels and the utilization of ZPWMA revenue. As noted previously, the Service can re-evaluate this finding, and the suspension on importation of trophies taken during calendar year 2015 or future hunting seasons could be lifted, if additional information on the status and management of elephants in Zimbabwe becomes available which satisfies the conditions of the 4(d) special rule under the ESA.

Sustainable Use: We have not been provided with adequate information regarding offtake in Zimbabwe, including basic fundamental information like the number of elephants that have been sport-hunted annually and the number of elephants that have been legally killed for the hide trade. For both the 2014 and 2015 hunting seasons (January – December), Zimbabwe has established an annual export quota of 500 elephants (1000 tusks). This is the same quota that Zimbabwe has reported to the CITES Secretariat since 2004. According to available information, it does not appear that Zimbabwe actually fills this quota each year, but due to variation in how trophies are categorized in CITES trade data, it is difficult to categorically identify the actual numbers of hunted elephants that are exported each year. Information provided by ZPWMA in response to our April 4, 2014, inquiry did not identify the number of trophies exported annually. Several statements from safari outfitters indicated that approximately 160 elephants are taken annually, but this number is not supported by any documentation.

ZPWMA categorizes offtake into six categories: Cropping (hunting and population control, which may include meat supply to rural communities and live animals to breeders), Natural Mortality (found dead of natural causes), Accidents (killed by trains, landmines, or vehicles), Poaching (illegal take), Problem Animals (elephants killed to protect human life and property), and Management Offtake (offtake due to other management decisions). No information was given on the number of elephants that are taken in each of these categories. It does not appear that Zimbabwe is currently conducting any culling operations, besides trophy hunting if considered a "cull".

According to information from ZPWMA, 293 elephants were poached in 2013, including the 105 elephants poisoned in Hwange National Park.[1] Of the five years of data ZPWMA provided in their April 17, 2014, response, an average of 190 elephants were identified as being poached annually. In 2009 and 2010, there was an average of 111 elephants poached; however, between 2011 and 2013, the average more than doubled to 243 elephants. It is not clear what stimulated this significant increase. Many countries have experienced a marked increase in poaching, due to the increase in demand for ivory. It is also possible that shifts in land tenure, governance,

[1] In our April 4, 2014, finding, we incorrectly stated that over 300 elephants had been poisoned.

ZPWMA's limited financial resources, or economic factors contributed to the increase. Further, while the number of animals poached in Zimbabwe does not appear to be as high as in other countries, information that was presented at CoP16 (CoP16 Doc. 53.1) indicates that there has been a steep rise in poaching incidents. Without more definitive population data, like what should come from the Pan African Aerial Elephant Survey when all of the data are released, there is no way to determine whether these numbers, combined with other offtake, are sustainable.

While the number of elephants taken as problem animals was not elucidated in material provided by ZPWMA in April 2014, it appears, based on their response and documentation provided by Conservation Force, that a large number of elephants are taken each year. ZPWMA reported that in a 3-year period (2009-2011), there were 372 human-elephant conflict cases for four "hot spot" districts. It is not clear if elephants were removed in each of these cases. However, the Service has anecdotal evidence suggesting that the number of problem animals may equal or exceed the number of elephants taken through sport-hunting.

The December 10, 2014, letter from ZPWMA, however, included some further information on off-takes. According to this letter, the percentage breakdown of all off-takes was as follows: 5% from problem animal control, 55-60% from hunting, and 35% from poaching and natural mortality. While specific numbers were not provided, the letter also stated that an average of 40 elephants was taken annually as problem animals. Therefore, if these percentages are correct, hunting off-take would be 440-480 animals, and poaching/natural mortality would be approximately 280 animals. However, the December letter also stated that management offtake (culling, training exercise, and meat production for park staff) was approximately 95 elephants annually. Based on these numbers and with a reported 3-year average of 180 elephants taken annually due to poaching (the 2013 Hwange incident of 105 elephants being poisoned was not included in this average), the natural mortality of elephants in Zimbabwe is approximately 100 animals/year or 0.12% annually. Since this is far below the likely natural mortality rate of healthy elephant populations, we question the accuracy of the percentage breakdown provided by ZPWMA in their letter.

African elephants in Zimbabwe are listed in CITES Appendix II, with an annotation that allows trade in hides. According to CITES trade data, at least 2,373 hides were exported in 2010, 3,204 in 2011, and 4,675 in 2012. It should be noted that these numbers probably do not equate to whole animals, but include whole hides and parts of hides. Some of these hides may have been obtained from sport-hunted trophies, problem animal control, or culling operations. Based on these reported numbers, it is not possible to determine the elephants taken specifically for the hide trade, however. While the Service asked about the export of hides in its October 31 letter, ZPWMA did not directly address the issue in its response letter. They did state that the export of hides was authorized under the annotation for African elephants and that all hides that are exported are legally obtained.

We continue to have fundamental questions regarding how the number of elephants to be hunted in an area is decided. In addition to questions about how the overall offtake is determined, we also have not received an adequate explanation on how the quota is allocated spatially. According to information from ZPWMA, and from safari outfitters and professional hunters associations, the principle form of utilization of the elephant in Zimbabwe is sport-hunting.

Quotas are apparently set to maximize the sustainable production of high-quality trophies without detriment to the population. However, it appears that the national export quota of 500 elephants may be the primary driver when establishing individual quotas for each hunting area, as opposed to determining the best quota to facilitate management goals for those areas. According to the material provided to the Service, it appears that the annual national quota of 500 elephants is divided up and allocated to each area based on recommendations from ZPWMA ecologists, field staff, safari operators, other stakeholders, and technical specialists through "multiple stakeholder participatory quota setting". According to information provided by ZPWMA, on an annual basis, stakeholders use available population data to propose a particular quota for an area to a Quota Setting Workshop. At this workshop, it is determined if the proposed quota should be adopted or modified in relation to other proposed quotas. Factors that are considered each year include population estimates, growth rates of populations, size of hunting areas, status of habitat, and target elephant population size.

While the material provided to the Service lays out the general process, the Service did not receive any specific information on how quotas are established in practice. ZPWMA provided the District Quota Setting Toolbox and the Quota Setting Manual, published in 2000 and 1997, respectively. While these documents are useful training material, they only provide a general overview of quota setting for all species in Zimbabwe. In establishing a quota, one must take into consideration not only the habitat, population size, and size of the hunting area, but other offtakes and environmental impacts that may be affecting the species. Nothing that ZPWMA provided addresses these elements specifically. Further, if ZPWMA starts with the premise that the sum of all established quotas must equal the national export quota, it is not clear if the science is driving the quota-setting process or if the social/economic benefits derived from hunting is the driving force. Finally, without current population data and information on the distribution of elephants across the country, both of which would come from scientifically based population surveys, it would appear that establishing a scientifically viable quota, either higher or lower than previous years, would be impossible. The current quota-setting process utilized by ZPWMA may take into consideration issues raised in this document, but without providing an explanation of the system used and describing the calculations, the Service cannot determine if sport-hunting quotas are reasonable or beneficial to elephant populations, and therefore whether sport-hunting is enhancing the survival of the species.

One of the aspects of whether current elephant management facilitates long-term sustainability of hunting programs is the length of hunting leases. There is a general consensus, supported by antidotal evidence, that shorter leases do not give safari operators an incentive for long-term planning. A representative of the Safari Operators Association of Zimbabwe (SOAZ) and the Zimbabwe Professional Hunters and Guides Association (ZPHGA) at the 2014 workshop, stated that the "present 5-year leases are not working as areas are being abused at the expense of wildlife" and that "[l]onger leases will provide better protection and investment in such areas. All leases must be open and transparent." In addition, he expressed that "[a]t present, large fixed quotas are forcing concession holders to take young animals that should not be shot, to recoup moneys paid for leases and trophy fees. Authorities need to stop transfers of quotas from one area to another for elephant and for all trophy species." He spoke of the need for taking smaller,

non-trophy bulls that are conducting crop raids to compensate local communities. He also spoke of stopping commercial hunts in the national parks and "most of all, keep the South Africans out – they are abusing our wildlife". He recommended that ZPWMA allocate all quotas by December 1 each year so that operators can market their hunts effectively. He also called for greater communication between ZPWMA and SOAZ and ZPHGA.

A second presenter at the workshop representing the Zambezi Society, stated in the working session on Coordination, Monitoring, Reporting, and Annual Adaptive Management that "we are looking at managing a multi-million dollar resource and what is a major project but appointing a part-time coordinator to attempt to pull together a multitude of stakeholders with a result that will fail". The speaker further stated, "[t]he way elephant conservation has been managed over the last several years in the face of an escalating poaching threat has clearly failed. ...The four sub-regions have differing characteristics and problems and separate plans are required for each sub-region" and called for a professional project manager to head the elephant conservation and management program in Zimbabwe, "otherwise it will not succeed."

While the above comments were made by two individuals at the workshop, since both individuals represented National organizations, their statements could be taken as an indication that additional work is needed to better coordinate professional hunters, safari outfitters, and NGOs with ZPWMA and communities. Without this "partnership" long-term sustainability of the hunting program could be affected and the role that U.S. hunters play could be questioned.

Revenue Utilization: On communal lands in Zimbabwe, the protection of elephants falls primarily under the Communal Areas Management Programme for Indigenous Resources (CAMPFIRE), which encourages reductions in human-elephant conflicts through conservation-based community development. The program was established in 1989 as a means of providing an economic incentive and return to rural communities while encouraging tolerance for the elephant and sustainable use of natural resources. This program has been the model for community-based conservation efforts in several other African countries and identified as an innovative program in the past. Under this program, there are currently 29 Rural District Councils (RDCs) that have been granted Appropriate Authority status under the Parks and Wild Life Act. Based on several CAMPFIRE documents presented to the Service, between 12 and 16 RDCs with exploitable wildlife resources make up the core of the CAMPFIRE program. While the Service recognizes that CAMPFIRE plays a role in elephant management, we did not receive clear information on the significance they play in elephant conservation (e.g., amount of elephant habitat occurring on RDC land or the percentage of elephant trophies taken on RDC lands).

According to the Revised CAMPFIRE Revenue Sharing Guidelines, which were incorporated into the Constitution of the CAMPFIRE Association in 2007, at least 55% of generated revenue from hunting should be devolved to producer communities, no more than 26% and 15% for management and overhead at RDC level, respectively, and 4% as a levy to the CAMPFIRE Association. According to an undated document (but presumably produced in late 2014) produced by CAMPFIRE (CAMPFIRE report undated) at least 10 RDCs comply with the Revenue Guidelines. As reported in this document, data were presented in an October 2013

report stating an estimated US$2,496,349 was generated by 15 RDCs in 2012 from hunting revenue. While this report states that 5 out of 13 RDCs contributed 84% of the hunting revenue, the supporting table to this statement does not reflect this number. Further, the report states that an assessment of 18 main CAMPFIRE districts allocated hunting quotas for 2014 shows that 106 out of 167 bull elephant hunts were booked by U.S. hunters and that elephant hunting contributes more than 70% of the income to the CAMPFIRE program, and that 90% of all CAMPFIRE revenue comes from all hunting.

The CAMPFIRE report (undated) reported that in the Community Based Natural Resources Management Stocktaking Assessment Report by Mazambani and Dembetembe (2010) [Service does not have a copy of this report], between 1989 and 2006, US$88.9 million in gross revenue was realized by key stakeholders in the CAMPFIRE program. Of this revenue, 55% went to safari outfitters, 23.4% to producer communities, 19.8% to RDCs, and 1.8% to CAMPFIRE Association. (The Service has no additional documentation or information to validate these figures.)

CAMPFIRE may well provide a "multiplier effect" concerning ecosystems goods and services. According to information received by the Service, in 2007, an estimated 777,000 households from 37 RDCs benefited directly or indirectly from CAMPFIRE. According to an estimate by CAMPFIRE officials (CAMPFIRE report undated), given that 58 RDCs now participate in CAMPFIRE (other sources state that there are 60 RDCs in CAMPFIRE), it has been extrapolated that over 1 million households now benefit from CAMPFIRE.

Several reports provided to the Service identify a large number of community projects funded by CAMPFIRE. These reports indicate CAMPFIRE programs contribute to employment at a local level – CAMPFIRE managers and officers, timber measurers, office clerks, game scouts; community projects employ resource monitors, tour guides, preschool teachers, grain millers, bookkeepers; and safari operators employ managers, scouts, trackers, drivers, cooks, camp minders, and professional staff such as bookkeepers and professional hunters.

On 17-18 November 2014, a workshop titled "CAMPFIRE Stakeholder's workshop: Towards the Development of a New Elephant Management Plan and Policy" was held in Zimbabwe. The discussions and recommendations touched on the effectiveness of the CAMPFIRE concept and its relationship to tourist hunting. At the workshop, Charles McCallum Safari reported that they had contributed over $349,000 to CAMPFIRE wards and the RDC in 2013 – U.S. elephant hunters contributed 40% of this total ($132,870). In 2014, the total was up to $400,995 but contributions due to U.S. hunters dropped to 27% ($100,800) – all elephant hunting was only 32% of the total ($118,425). It appears that the workshop may have been a good starting point to address issues faced by RDCs and to improve the effectiveness of CAMPFIRE. However, according to Conservation Force, represented at the workshop, CAMPFIRE needs to find a balance between a large elephant population and human population pressures, as well as ensure that revenue from tourist hunting and other resource uses continue to flow to local communities. The 2014 Pan African survey preliminary results appear to confirm that elephant populations in the Zambezi Valley and in Sebungwe have decreased significantly. These areas include

communal land. The declines indicate that the persistence of elephants in these areas may be in question in future years if the trend is not halted or reversed.

Dr. Martin states in his "Third Report: Potential Financial Returns from Trophy Hunting" (pg. 19, 21) that "when the results from all the available hunting areas in Zimbabwe are added up, there is sufficient income from trophy hunting to meet the conservation budgets for all the areas [of the elephant range]..." This may very well be true, but no such data was provided to the Service. We received reports from some private areas, conservancies, and RDCs, but even in these cases, insufficient information was provided. We received generalized reporting of hunting as a whole, without a breakdown of elephant vs. other species, or U.S. hunter vs. all hunters. Although there is some indication that some benefits are occurring, insufficient information has been provided to show that revenues generated by U.S. elephant hunters satisfy the conditions of enhancement under the ESA.

FWS does not disagree that local communities can benefit from well-managed resource management programs, but we are unable to determine how much revenue is generated by elephant hunting, how those funds are distributed within Zimbabwe, and what portion of that budget is accounted for by US hunters? SCI indicates, in their January 23, 2015 letter, that the inability to import trophies in 2014 resulted in an increase in human-elephant conflicts in CAMPFIRE RDCs from 412 incidents in 2013 to 597 in 2014. No data was provided to document a link between the increase in human-elephant conflicts indicated by SCI and the suspension of imports in 2014.

Local conservation efforts: Conservation Force and other commenters emphasized the economic impact of the suspension to local conservation efforts being carried out by individual landowners and leaseholders, safari outfitters, and conservancies. Effective conservation work is being carried out in some independently managed areas. Individuals may be impacted by a suspension of elephant trophy imports, however, it is unknown whether and to what extent these individuals would reduce their conservation efforts based on the inability of U.S. hunters to import a sport-hunted trophy. In addition, the information available to the Service on the conservation work being carried out by non-governmental entities, at this time, is limited, and is not the norm for Zimbabwe as a whole. While these pockets of conservation are greatly needed, there does not appear to be a mechanism in place, such as government support, tax incentives, or land tenure security, to promote or sustain these efforts across Zimbabwe's elephant range. The Service was made aware of several workshops that will be held or were held in the beginning of 2015. According to Conservation Force, a workshop on anti-poaching strategies for Mana Pools National Park was held on 26-29 January 2015. The workshop appears to have been sponsored by ZPWMA with NGO, safari operators, and some RDC representation; however, we have not received any information on the purpose of the workshop or any results. In addition, a workshop in Sebungwe was held sometime in January or February 2015. Again, we are not clear on the purpose of the workshop or any results. However, if these and other workshops were held that bring ZPWMA, RDCs, and safari operators together to discuss elephant conservation and management, it would appear that steps are being made to move forward in increasing communication and addressing issues.

Therefore, with the information made available to us, the Service cannot at this time determine that these limited activities would provide the enhancement required under the ESA to allow imports of trophies taken throughout Zimbabwe.

Summary: The issue before us is whether the killing of an elephant in Zimbabwe whose trophy is intended for import into the United States would enhance the survival of the species in the wild. When the Service announced the interim suspension on the import of elephant trophies from Zimbabwe on April 4, 2014, we based the decision on the lack of information available to the Service at that time that would enable us to make a positive finding. In response to our April 4, 2014, announcement and letters sent to the Government of Zimbabwe on April 4 and October 31, 2014, we received a large volume of information directly from ZPWMA, Conservation Force, Safari Club International, and a number of safari outfitters and professional hunter associations. Some information indicated that hunting in Zimbabwe was providing a benefit to elephants, while other information raised questions that were not answered. Many of our specific questions were not answered with the information provided. Based on our review of all of this information, we are unable to find that the killing of an elephant whose trophy is intended for import would enhance the survival of the species in the wild due to the following factors:

- Zimbabwe's current elephant management plan consists of two primary documents drafted in 1996 and 1997. Although the documents provide a well-developed list of goals and objectives, there is no information on whether these goals and objectives have been met or could be met. This is supported by statements from ZPWMA that the plans are outdated and need to be revised.

- Now that the Pan African Elephant Aerial Survey has been conducted in Zimbabwe and preliminary findings have been announced, ZPWMA and RDCs have a better elephant baseline population abundance estimate to assess future off-take quotas, management efforts, and anti-poaching activities. This is a significant, positive, step forward in Zimbabwe having adequate information to establish scientifically defensible hunting quotas, particularly in light of the limited information on other means of off-take, such as poaching and problem animal control. If this information is incorporated into ZPMWA management activities in a scientifically sound manner, the Service may have a better basis to re-evaluate our finding with regard to importation of elephants taken in the future.

- There appear to be adequate laws and regulations in place to address elephant management, but it is not clear if or to what extent ZPWMA is able to successfully implement them. Since the central Zimbabwean Government is not allocating funding to ZPWMA and the vast majority of funding must come from hunting revenues, ZPWMA, and CAMPFIRE need to document more fully the amount of revenue generated and how it is utilized. For the 2014 hunting season, the Service received limited evidence to support a positive enhancement finding. If accounting mechanisms are in place or are put in place that document hunting revenue and details are provided on how those funds are used for resource protection such that the Service would be able to find that hunting revenues generated

through sport-hunting of elephants in Zimbabwe whose trophies are intended for import into the United States would enhance the survival of the species in the wild, the Service could re-evaluate our finding with regard to importation of elephants taken during the 2015 hunting season or future hunting seasons.

- According to the information provided, Zimbabwe has established hunting quotas for all areas of the country. However, the Service did not receive specific information on how these quotas are established, whether other forms of offtake, such as poaching and problem animal control, were taken into account, or to what extent biological factors are taken into consideration (as opposed to economic and societal considerations).

- While CAMPFIRE has provided conservation benefits in the past and improved tolerance of wildlife in rural communities, the program has more recently come under criticism relating to excessive retention of generated funds by district councils, resulting in diminished benefits to communities. Sport-hunting may be an important tool that gives these communities a stake in sustainable management of the elephant as a natural and economic resource and offsets the costs of conflict with wildlife. However, without current information on how funds are utilized and the basis for hunting off-takes, the Service is unable to confirm whether revenue generated through sport-hunting actually provides an incentive to local communities to conserve elephants. The Service was pleased to hear about the November workshop and acknowledges that additional work is needed by CAMPFIRE to address current management concerns. Again, if additional information is forthcoming regarding activities in 2015, the Service may be able to revisit this finding.

- As stated in the previous finding, there are "bright spots" regarding elephant conservation efforts, particularly those carried out by non-governmental entities that are providing a benefit to elephants in some areas. However, there are not enough of these "bright spots" to overcome the problems currently facing Zimbabwe elephant populations and to support a finding that sport-hunting is enhancing the survival of the species. Without more support from the Central Government and Rural District Councils, these efforts are not likely to be fully successful or to compensate for the management deficiencies described above.

Therefore, based on this finding, no elephants harvested in Zimbabwe on or after January 1, 2015 may be imported into the United States.

ATTACHMENT

Chart of Key Documents and Supporting Evidence

EXCERPTS FROM KEY DOCUMENTS IN SUPPORT OF THIS APPEAL

The charts below contain key quotations from some of the key documents submitted during the thirty-eight months of the suspension. These documents include ZPWMA responses to FWS information requests, reports from the CAMPFIRE Association, reports from safari hunting operators, and the letter from the AfESG, among others. The following charts are broken down by the sub-topics of the March 26, 2015 Finding. Issue-by-issue, the documents refute the alleged lack of data, reliance on "anecdotal" or "antidotal" information, and mistakes in the Finding and provide extensive documentation of enhancement.

All documents have previously been produced to the FWS including, most recently, in support of the applicants' request for reconsideration.

Management Plans

DOCUMENT NAME	SAMPLE OF KEY QUOTATIONS
ZPWMA Apr. 2014 Response	- The Authority supervises the implementation of the plan outside protected areas including communal areas, Conservancies, Forestry Commission area and private land. (p. 2)
ZPWMA Dec. 2014 Response	- 1.4 Has ZimParks established specific measurables of management actions for the goals identified in the management plan documents that will/are being taken? … Yes we have specific measurables of management actions for example: - i) Population parameters: numbers, Eg Aerial survey results, age, sex, distribution movement patterns through satellite tracking and collaring (through monitoring and surveys), trophy quality - ii) Law enforcement effort: Number of patrols, patrol nights, number of convictions, number of elephants poached, number of new Statutory Instruments approved - iii) Game water supple: number of boreholes working, number of elephant mortalities - iv) Fire management: Annual fire management plans developed and implemented, area burnt by unplanned fires, length of fireguards - v) Awareness programs: No. of awareness campaigns held, no. of people reached (p. 11-14)
ZPWMA July 2015 Response	- The population estimate from the 2014 aerial survey stands at 82,092 elephants. In the early 1900s the elephant population in Zimbabwe was estimated to be about 4,000. By 1980 the population had increased to an estimate of 46 426 elephants. The population continued to increase … twenty-fold … despite attempts to limit elephant population growth between 1960 and 1989 … The human population has also increased twenty-fold between 1900 and 2000, resulting in increased demand for land for

	agriculture and other forms of land-use outside protected areas thereby limiting the area available for elephants with a resultant increase in human elephant conflict … The high economic value conferred to the elephant through consumptive utilization has also resulted in increased tolerance by local communities. (p. 1) - Explanation of specifics of Elephant Management Plan (p. 9-19) - Zimbabwe has developed a number of national policies, as well as adopting regional and international protocols to address poaching. As explained the 17 April 2014 response to the USFWS poaching incidents are handled though a coordinated public-private response, including heightened law enforcement, severe deterrent sentencing, awareness campaigns, and substantial donations from the private sector to boost ranger and equipment capacity. Steps were also taken after the Hwange poisoning incidents to improve radio communications in that area, as well as establishing a new station with 15 rangers, to increase law enforcement coverage. Aerial surveillance in Hwange and other areas has been intensified. (p. 27) - It is one of the ZPWMA's policies to cooperate with safari operators, who provide significant assistance by alerting ZPWMA rangers to poaching threats; providing equipment, training and transport; and conducting their own anti-poaching patrols among other things. (p. 27)
ZPWMA, Elephant Management Plan 2015-2020	- The Role of Sport Hunting in Elephant Conservation: Elephants are a charismatic species but can also be destructive when they destroy crops, threaten livestock and even human lives. To have a future, elephants must have value. Value to the governing authorities and to the local people. The greater the value, the greater the tolerance of them is likely to be. The local people who live closest to them will determine the long-term survival of species like elephant. Regulated sport hunting converts wildlife into assets for the benefit of local people and the country as a whole. Wildlife can be a most valuable asset and in turn empower local communities and provide basic necessities. When it is viewed as a valuable asset, wildlife becomes an economically competitive land use in Zimbabwe, which leads to habitat preservation instead of habitat destruction and conversion to agriculture or livestock production. Game animals have a survival advantage because of user-pay stewardship systems where use revenue generated from tourist hunters is paid through to wildlife authorities and local communities. The presence of regulated hunting can also reduce illegal activities. Many hunting operators in Zimbabwe have specialised anti-poaching units. Private operators' lease agreements are being reviewed to include anti-poaching as an obligation of the concessionaire. Regulated hunting is the opposite of poaching. One is a lawful activity designed by government wildlife authorities and experts to perpetuate resources and the other is prohibited thievery outside of and away from the system. The first is like making a bank

	deposit and the second is like a bank robbery, without sustainable limits. Trophy hunting revenues are vital because there are not enough tourists to otherwise generate income to support all protected areas. Eco-tourism revenues are typically sufficient to cover the costs of only some of the parks and certainly not to justify wildlife as a land use outside of protected areas. Hunting is able to generate revenues under a wider range of scenarios than eco-tourism, including in remote areas lacking infra-structure, attractive scenery, or high densities of viewable wildlife. Consequently, elephant and other wildlife populations will be negatively affected through reduced conservation efforts arising from low funding and reduced goodwill from the communities, when in reality the elephant has the economic potential to raise adequate funds to support itself and other species. For these reasons, Zimbabwe confirms its commitment to the sustainable use of elephant and other wildlife in this Action Plan. (p. 12, Box 1) - v) Private sector: The corporate community participates in elephant management mainly through resource mobilization. Safari operators report poaching and assist in anti-poaching patrols. Through lease and trophy fees they provide revenue to ZPWMA. They help develop infrastructure, provide funds to communities and supplement diets with meat from trophy animals. Zimbabwe subscribes to the principle of sustainable utilisation of wildlife resources including elephants. Sport hunting is the principal form of wildlife utilisation whereby offtakes are adaptively managed and monitored through a participatory and science based process. This process allows for sustainable offtakes, and rigorous resource monitoring programmes that allow recruitment within a population to ensure the continued survival of the population in the wild. The high economic value conferred to the elephant through consumptive utilisation has also resulted in increased tolerance by local communities. (p. 12) - vi) Local communities: Local communities are involved in elephant management in CAMPFIRE areas, through sharing of information, advocacy and wildlife protection. They report human-elephant conflicts and carryout some of the conflict management activities. (p. 12-13) - The Importance of Community Based Conservation to the Future of Elephant Management in Zimbabwe: The Community Areas Management Programme for Indigenous Resources (CAMPFIRE) of Zimbabwe has been widely regarded as one of Africa's most successful contemporary conservation initiatives. It permits the residents of communal lands – basically the poor rural communities – to share in the benefits generated by wildlife utilization on those lands by granting Appropriate Authority to Rural District Councils (RDCs) to manage wildlife on communal lands and requiring a certain percentage of revenue to be paid to the wards and councils. CAMPFIRE operates in about 50,000 km2 (12.7%) of land in Zimbabwe. This is roughly equivalent landmass to the Parks and Wildlife Estate. CAMPFIRE encompasses about 777,000 households with an average family size of five, who face food insecurity and deep poverty (average income $1 a day). Between 1994 and 2012, CAMPFIRE generated $39 million of which $21.5 million was allocated to communities and used for resource management (22%), household benefits

	(26%), and community projects (52%). About 90% of CAMPFIRE's revenue comes from hunting, with elephant hunting contributing more than 70% of annual revenue. Based on the Constitution of the CAMPFIRE Association as amended in 2007, all major hunting RDCs use CAMPFIRE revenue-sharing guidelines. In these districts safari operators pay revenue directly into community-controlled bank accounts using the following breakdown: CAMPFIRE community share (55%), RDC fees (41%), CAMPFIRE Association levy (4%). Despite its achievements CAMPFIRE still faces fundamental challenges. In particular, the development strategies of households in CAMPFIRE areas focus on land uses that are incompatible with wildlife such as human immigration to rural areas, the extension of basic agricultural schemes and increased livestock numbers. Other CAMPFIRE challenges include: (i) the downturn in Zimbabwe's economy and tourism sector post-2000, (ii) great reliance on consumptive trophy hunting and less focus on other uses and non-consumptive uses of natural resources, (iii) increasing human populations averaging 16-20 people per km^2 in some key wildlife districts, and (iv) lack of re-investment in development, fixed assets, human capital, and management and protection of wildlife in CAMPFIRE areas. Despite these challenges, CAMPFIRE stands very high in the agenda of Zimbabwe's Government, and a review dedicated to improving the programme, including greater devolution of ownership of wildlife to communities, is ongoing and should be finalized by the end of 2015. Zimbabwe's Government recognizes that the survival of wild animals depends entirely on those among whom they live. Unless local people want to save them, wildlife will be poached to the point where just a few remain in fortified reserves. CAMPFIRE is meant to avoid this and the future of wildlife in communal areas rests on the success of this programme. (p. 12-13, Box 2) - 1.3.5 Links with continental (African Elephant Action Plan / SADC) and other regional initiatives: This Action Plan recognizes the existence of the African Elephant Action Plan and initiatives that are currently taking place at a continental level, including by the African Union. These include the development of the Common Strategy on Combating Illegal Exploitation and Illegal Trade in Wild Fauna and Flora in Africa. At the SADC level initiatives involve developing a Plan of Action and implementing the SADC Protocol on Wildlife Conservation and Law Enforcement. This Action Plan will be reviewed periodically in the light of developments that are taking place in the SADC Region, Africa and beyond. - 1.3.6 Regional strategies within Zimbabwe: The devolution of management oversight to regional levels, with more detailed action plans within the national plan, provides the basis for effective adaptive management at regional and local levels. As set forth in the framework below (Sections 3 and 4), four regional plans have been drafted to address the unique challenges of each region, and will implement the broader goals of this national Action Plan at a more specific level. In addition, Park-level plans for specific protected areas (including Hwange National Park, Mana Pools National Park, and Gonarezhou

	National Park) contribute to this Action Plan and govern the management of elephant within those protected areas. (p. 14) - 1.3.8 Human elephant conflict: As Zimbabwe's human population grows, elephant are being restricted to smaller areas and as their populations expand they increasingly move out of their designated habitat, and raid crops and sometimes threaten human lives. As a result in many rural areas where elephants exist in Zimbabwe, human-elephant conflicts are increasing, creating substantial negative attitudes to the conservation efforts of elephants. These are often among the poorest rural farmers, which makes the issue complex in social and economic terms. Unresolved conflicts stimulate poaching or retaliation. Poachers or retaliators can be seen as "local heroes" because they provide meat to the communities and resolve the conflict. A major challenge for elephant management is keeping human-elephant conflicts to a minimum. Developing a Social, Economic, and Cultural Framework has been identified as a Key Component of this Action Plan in an effort to address and reduce human-elephant conflicts. (p. 15) - Towards a Comprehensive Strategy to Reduce Human-Elephant Conflict: Some methods of reducing human-elephant conflict focus on curing the effects, not the cause. Such methods include chilli sprays, fences, and evening patrols to scare off marauding elephants. However, these are not necessarily long-term solutions. Long-term solutions require growing the tolerance of local communities for elephant by ensuring the communities benefit from having elephant on their lands. Tolerance is likely to increase if communities realise and appreciate economic returns earned from the sustainable use of elephant. Economic returns may be generated by consumptive and non-consumptive tourism. The devolution of decision-making on aspects of problem animal control to communities may result in better outcomes for the management of the costs and benefits of this activity. Problem animal control includes disturbing, removing, translocating, or ultimately killing those elephant that persist in damaging crops or threatening human life. Clearly, no one management option will successfully deal with all problem elephants and conflict situations. As part of this Action Plan, ZPWMA will undertake additional research on problem animal control and minimizing conflict, and will develop new solutions and a more comprehensive response to these issues. (p. 15, Box 4)
ZPWMA, Elephant Management Plan Supplement (2016)	- Table 1: Financial resources deployed up to August 2016 (p. 1) - Table 2: Other Non-Financial Resources (p. 2) - Progress towards Implementation of the Elephant Management Plan (2015 – 2020): Several milestones stated in the Elephant Management Plan have already been achieved which include the following: - Appointment of the Elephant Manager as in section 4.5 of the Zimbabwe Elephant Management Plan (2015 – 2020).

	- Getting a basic agreement of implementation in the 4 relevant regions. - Some work towards Law Enforcement, Monitoring, Investigations, Training and Community Relations. As of August 2016, more than USD 1 million had been spent on these activities. - Constraints and Challenges: One of the major challenges regarding implementation of the EMP is with regards to the adoption of stricter domestic measures by the United States of America. This has had the net effect of further reducing the revenue from hunting into the Authority, which therefore affects the budget allocated to resource protection, in particular the elephant in this case. One of the key impediments towards the full and comprehensive implementation of the Elephant Management Plan is the limited resources. However, Zimbabwe is at an advanced stage in the development of resource mobilisation strategies. These strategies include partnering with both local and international institutions in resourcing and financing aspects of the programme. (p. 2-3) - Priorities: Due to the fact that Zimbabwe is experiencing some funding constraints with respect to the full implementation of the Elephant Management Plan, which means therefore that it will not be possible to fully implement every aspect of the plan at the same time, we have developed a set of priorities (all drawn from the plan), that we feel are implementable and enable the work of conservation to proceed smoothly. - Law Enforcement: Law enforcement continues to be one of the most critical aspects of this strategy. From the perspective of the EMP, it has also to date been allocated the biggest budget (Table 1). While strategic gaps still exist with respect to the law enforcement capacity (the numbers of rangers on the ground are still in need of improving to effectively cover that Parks Estate, more patrol kits and equipment are still required to improve enforcement capacity). In order to effectively combat poaching and illegal trade the Law enforcement capabilities are top priority. - Monitoring: Biological monitoring and management, with respect to the priorities for this plan would come in as a second priority. This enables monitoring programmes and research to support science based adaptive management of elephants in this action plan. The resource allocation to this activity needs to be dramatically improved, although innovations have had to be put in place to manage that insufficient resource allocation. Rangers on patrol also carry out significant monitoring activities which feed into the biological monitoring and management of the elephants. - Investigations/Intelligence: The investigations capacity (together with training) are critical components of this action plan. To date of the available resources, allocations to investigations have been minimal. Innovations have also been developed in this area, for support from various private players, institutions and state institutions in the investigative processes. (p. 3)

	- Appointment of Elephant Manager: While the appointment of the National Elephant Manager has been concluded (April 2016) to enhance implementation, monitoring and evaluation of the Action Plan, funding constraints still exists. Some funding for the activities of the Elephant Manager have been unlocked through cooperation with stakeholders in the monitoring and evaluation activities of the office. This includes setting up of the Regional Elephant Management Committees and funding their activities. (p. 4) - Four annexes – status of implementation of each regional elephant management plan

Population Status

DOCUMENT NAME	SAMPLE OF KEY QUOTATIONS
ZPWMA Apr. 2014 Response	- Information on the status of elephants is derived from surveys which include, aerial, water-hole, road strip, walking transects, visitor observations /sightings and ranger based monitoring. (p. 1) - Currently the Authority is in the process of planning a national aerial survey in the dry season of 2014… (p. 4)
ZPWMA Dec. 2014 Response	- Population estimates for elephants are determined through various methodologies which include: aerial surveys, water hole counts, road strip counts and ranger based monitoring. Waterhole counts are conducted for Hwange and Mana Pools on an annual basis. A national aerial survey of elephants was conducted in 2014 as part of the Pan African Aerial Survey for Elephants. Monitoring of trends in trophy quality and other forms of utilization are on-going programs. Results from the monitoring are used to adjust hunting quotas in order to achieve the desired levels of trophy quality. (p. 2) - In addition to aerial surveys, the Authority conducts regular waterhole counts and road strip counts. Water hole surveys, for instance, provide valuable information which can be used to make decisions in the absence of aerial survey data. A good example is the general increase of the Hwange elephant population shown by water hole counts that have been conducted annually from 1972 to 20 14. (p. 15)
ZPWMA July 2015 Response	- The population estimate from the 2014 aerial survey stands at 82,092 elephants [and attaching survey results]. In the early 1900s the elephant population in Zimbabwe was estimated to be about 4,000. By 1980 the population had increased to an estimate of 46 426 elephants. The population continued to increase … twenty-fold … despite attempts to limit elephant population growth between 1960 and 1989 … The human population has also increased twenty-fold between 1900 and 2000, resulting in increased demand for land for agriculture and other forms of land-use outside protected areas thereby limiting the

area available for elephants with a resultant increase in human elephant conflict … The high economic value conferred to the elephant through consumptive utilization has also resulted in increased tolerance by local communities. (p. 1)

- Table 4a & 4b: MIKE data 2000-2014 (p. 25)

Chewore

	2010	2011	2012	2013	2014
Total Carcasses	29	51	43	91	52
# Illegally Killed	4	34	34	36	9
PIKE	0.14	0.67	0.79	0.40	0.17

NyamiNyami

	2010	2011	2012	2013	2014
Total Carcasses	19	16	52	36	27
# Illegally Killed	19	13	14	8	10
PIKE	1.00	0.81	0.27	0.22	0.37

ZPWMA, Non-Detriment Finding (2014)

- In Zimbabwe, despite the threat of poaching in some areas, the elephant populations have continued to increase in all the protected areas as indicated in Tables 4 and 5. Illegal off-takes remain at a low level. The major threat to the survival of viable populations is habitat loss and fragmentation outside protected areas due to the expansion of human settlements and agriculture. The protected areas within the Sebungwe region (Fig 1), for example, are relatively small (less than 10,000 km^2) and surrounded by communal lands. The existence of a hard edge between such protected areas and communal lands leads to serious human/elephant conflicts. Healthy and viable populations inside protected areas are depended on the existence of suitable habitats in communal areas. (p. 19)

IUCN AFESG Letter

- … on the basis of the AfESG's 2013 Provisional Status Report, the USFWS enhancement finding indicated that no surveys had been conducted in Hwange National Park … but in fact, a survey had been completed in 2007 … this survey was listed in the "New Surveys" portion of the AED website … the estimate … (financed by the USFWS) was 39,765 elephants … which would have added over 30,000 elephants to the DEFINITE category and changed the distribution of elephants across all data categories. (p. 2)
- There are four other instances in which the use of data from the AED presented within the finding's "Population Status" section demonstrated oversights or misinterpretations, as well as a fifth instance meriting clarification. First, the finding stated, "Several areas that were covered in the current surveys

	(2006-2010) indicate that there has been a substantial decline in the population" (page 6). The AED shows, however, that three surveys carried out in this period … estimated higher totals than their respective previous, comparable surveys [and pointing out that these four surveys plus the NW Matabeleland survey all dated since 2006 and exceeded 70,000 elephants] … As a result, we do not find support for the claim that these four surveys from 2006 to 2010 indicate a substantial population decline, nor do we understand the basis for this statement in the enhancement finding. (p. 2) - Even if all of these elephants [in the Save Valley survey] were double counted, which is highly unlikely, the total number would decline from 1,538 to 1,492 – a figure still higher than any previous counts of the area. (p. 3) - Additionally, the finding states that "A carcass ratio of less than 4% … is considered unrealistically low…" The first sentence suggests a conflation of carcass ratios from aerial surveys and mortality rates, and its conclusion is unwarranted… In the opinion of our DRWG, 4% seems a reasonable figure for a population not particularly affected by poaching. (p. 3) - Fourth, … the finding's comment that "only 304 definite animals were counted by aerial or ground counts" …, considering methodology within the DEFINITE category, is not relevant; and as stated in the next section, sample counts are not inferior to total counts. (p. 3) - [T]he USFWS also presented statements regarding the appropriateness of Zimbabwe's survey methodology … Our opinion … is that the methodological approaches applied in Zimbabwe are both adequate to estimate elephant population numbers and to allow the most consistent possible means for comparing these numbers over time. (p. 3-4) - [T]he enhancement finding suggests the incorporation of new technology as being necessary to improve estimate accuracy … This statement disregards the well-recognised and accepted advantages to maintaining consistent survey methods while indirectly implying the approach undertaken in Zimbabwe has been somehow sub-standard. While it is always the case that some improvements in accuracy might result from the use of new techniques, it is generally recognized that the survey techniques used in Zimbabwe are of a high standard and have been consistently applied over time. (p. 4) - Despite the fact that PIKE data for 2012 has been available … and updated findings for 2013 were posted … nearly a month before the enhancement finding was updated, the finding stated that 2012 and 2013 data were not available. (p. 4-5)
SOAZ Report	- We have received information from fourteen safari operators in Zimbabwe. The operations of these companies cover a wide range of safari concessions including Government Safaris Areas, Campfire Areas and Private Conservancies. They also include safari concessions in the three main wildlife systems in

	Zimbabwe being; (1) Zambezi Valley and Sebungwe, (2) the North West including Hwange/Matetsi/Vic Falls and (3) the South & South East Lowveld including Gonarezhou, Save Valley Conservancy & Bubye Conservancy. (p. 1) - The members of SOAZ do not believe that the national population of elephant is in decline or under threat as a result of poaching. On consultation with our members, most populations would appear to be increasing or stable. There does seem to be concern about the elephant population in the Sebungwe region where the impact of poaching is indicated as significant. While much of this information is anecdotal and not based on scientific survey, we are confident that in the vast majority of safari areas throughout the country, the elephant population is not significantly declining or under threat. (p. 4) - While National Parks provide the primary refuge for elephant populations in Zimbabwe, a significant proportion of elephant live in the safari areas which are generally more marginal in terms of wildlife numbers and often have large rural human populations within or adjacent to them. The role of safari operations in providing a benefit to such communities and enforcing anti poaching as a means of maintaining elephant and other wildlife populations in these areas cannot be underestimated. (p. 4)

Regulations and Enforcement

<table>
<tr><th>DOCUMENT NAME</th><th>SAMPLE OF KEY QUOTATIONS</th></tr>
<tr><td>ZPWMA Apr. 2014 Response</td><td>- (p. 12):
<table>
<tr><td>Year</td><td>2009</td><td>2010</td><td>2011</td><td>2012</td><td>2013</td></tr>
<tr><td>No. of Elephants Poached</td><td>145</td><td>77</td><td>223</td><td>212</td><td>293</td></tr>
</table>
- It is however important to note that although the trends in poaching have increased in recent years, the impact of poaching on the national elephant population is not significant. The Government of Zimbabwe reacted swiftly to the unprecedented elephant poisoning incident in Hwange National Park in 2013. A private sector driven fund raising initiative was set up which has to date managed to mobilize 21 vehicles, communication and field equipment for enhanced law enforcement. The ZPWMA has increased manpower level for Hwange and other protected areas through a massive recruitment drive. The police and the judiciary also actively collaborated with the ZPWMA in apprehending all 35 poachers that were involved in the elephant poisoning... (p. 13)
- Summary of arrests and prosecution of elephant poaching cases for period between 2011 and 2013 (p. 14)</td></tr>
</table>

	- The Parks and Wildlife Act Chapter 20:14 … recognises any land that is being used for wildlife conservation and designates the legal occupant of that land as Appropriate Authority. On communal lands/tribal Appropriate Authority is accorded to the Rural District Council. Appropriate Authority is the legal right to utilize and manage wildlife on the property under community jurisdiction. (p. 15-16)
ZPWMA Dec. 2014 Response	- Law enforcement activities are carried out in and outside protected areas through various strategies including extended, daily and strategic patrols in the elephant range areas. There are also regular training exercises in basic, intermediate and advanced anti-poaching tactics for the rangers as part of management activities to improve law enforcement. Rapid response anti-poaching units who have specialized training for deployment to high risk areas have been constituted as a result of the training activities. In 2013, countrywide law enforcement efforts resulted in the detection of a large number of poacher incursions and armed contacts including recovery of poached wildlife specimens and ammunition. In the same year, there were 27 armed contacts that resulted in 9 poachers being killed during field operations, whilst recoveries from poachers and illegal traders included 35 rifles, 1000 rounds of ammunition, 9 rhino horns and 491 elephant tusks. (p. 2) - There are no amendments to land tenure however, the elephant range extends into large areas of communal lands which form part of the migratory routes. Elephants are also found on private land where there is enough space for relatively sizable populations, e.g. in Conservancies. In most cases there is connectivity from core protected areas to communal areas under CAMPFIRE and to private farms, in some cases. The elephant range and migration corridors have been extended through the TFCA program—a regional policy initiative which Zimbabwe is implementing in collaboration with its neighbours. Currently Zimbabwe is pursuing six TFCA initiatives. Most of Zimbabwe's large protected areas are on the countries boundaries and the elephant populations are linked to these neighbouring countries' boundaries and as such, creation of these large conservation areas is a viable option for elephant range expansion. In doing so, Zimbabwe is implementing a policy direction adopted at a regional level to increase the habitat available to wildlife including elephants. (p. 11) - The Authority has successfully lobbied the Judiciary for stiffer penalties for wildlife crime including poaching … The measurable indicators include number of Statutory Instruments (SI) that have been gazetted, for example SI 45 of 2014. Capacity building workshops to improve investigations and prosecution of wildlife crime are conducted in partnerships with NGOs and these are also measurable indicators of management actions. (p. 13-14) - Table 1 shows the number and trends in elephant poaching in the parks estate since 2012 to October 2014. (p. 15)

ZPWMA July 2015 Response	- ZPWMA has a staff complement of 1,500 field rangers whose core mandate is anti-poaching activities. Table 5 below is an indicative budget for effective protection of the Parks and Wildlife Estates. Table 5: Budget for anti-poaching activities (p. 34-35) - Table 6: Summary of Serious Wildlife Crime Cases recorded in Zimbabwe (p. 35-36)
ZPWMA, Non-Detriment Finding (2014)	- Elephant poaching in Zimbabwe is relatively low but trends have been increasing in recent years … The conviction rate for the period under review (2011-2014 February) is 69% of locals and 95% of foreigners arrested. The high conviction rates indicate the level of understanding and appreciation of the elephant value by judiciary. Elephant poaching and illegal possession of elephant products are classified as an economic crime which carry a mandatory sentence of not less than nine years on conviction. The provision of a mandatory imprisonment of not less than nine years crimes as provided for in the General Laws Amendment Act (No. 5) of 2010 ensures deterrent sentences for poaching. (p. 19-20)
CAMPFIRE—Role of Hunting Report	- In 1982, the government amended the 1975 Parks and Wildlife Act to enable Rural District Councils (RDCs) to obtain 'appropriate authority' (AA) to utilize wildlife for commercial gain … This Act provided an opportunity to extend to communities in the Communal Lands the benefits that the private landowners enjoyed as a result of the 1975 Parks and Wild Life Act. This eventually led to the birth of Zimbabwe's Community Areas Management Program for Indigenous Resources (CAMPFIRE), which had far reaching impacts on wildlife productivity as well as the socio-economic wellbeing of CAMPFIRE communities. (p. 2) - The CAMPFIRE program was conceptually designed to focus on wildlife, woodlands, water, grazing resources, and grasslands. In practice, it focused on managing wildlife because of the direct monetary benefits which this resource offered to producer communities. The CAMPFIRE concept … was developed in response to the realization that unless communities living adjacent to National Parks can obtain direct value from wildlife, they will not protect the wildlife. These communities would also need to have a much greater say in how those benefits would be derived and utilized. (p. 2)
SOAZ Report	- We have received information from fourteen safari operators in Zimbabwe. The operations of these companies cover a wide range of safari concessions including Government Safaris Areas, Campfire Areas and Private Conservancies. They also include safari concessions in the three main wildlife systems in Zimbabwe being; (1) Zambezi Valley and Sebungwe, (2) the North West including Hwange/Matetsi/Vic Falls and (3) the South & South East Lowveld including Gonarezhou, Save Valley Conservancy & Bubye Conservancy. (p. 1)

<table>
<tr><td></td><td>
- Table 2 shows that the 14 Safari Operators that responded to the questionnaire spent a combined total of $957,843.00 on anti poaching in their areas and this employs 245 people specifically for anti poaching. (p. 4)
- Table 2. The expenditure on Anti Poaching and number of Anti Poaching personnel employed by 14 Safari Operators in Zimbabwe (p. 4)
<table>
<tr><th>Anti Poaching expenditure – 2013</th><th>Anti Poaching Personnel Employed</th></tr>
<tr><td>US$957,843.00</td><td>245</td></tr>
</table>
- As in Section 3, if these figures are extrapolated out to give figures relative to the 160 sport hunted elephant imported into the USA each year from Zimbabwe, we can make the assumption that US hunters are assisting with the funding of $1,388,872.35 towards anti poaching in Zimbabwe through their safari payments and that this is enabling the employment of 355 anti poaching personnel along with all the equipment and support required. The imposed suspension on the import of sport hunted elephant into the USA from Zimbabwe will have a significant detrimental impact on these figures and in many cases the anti poaching efforts will not be sustained. (p. 4)
</td></tr>
<tr><td>FWS Press Release</td><td>
- In Zimbabwe, available data, though limited, indicate a significant decline in the elephant population. Anecdotal evidence, such as the widely publicized poisoning last year of 300 elephants in Hwange National Park, suggests that Zimbabwe's elephants are also under siege.
- Legal, well-regulated sport hunting, as part of a sound management program, can benefit the conservation of listed species by providing incentives to local communities to conserve the species and by putting much-needed revenue back into conservation. At this time, the Service does not have conservation concerns with African elephant sport hunting in Namibia, South Africa, or Botswana; though it should be noted that Botswana is not currently open to elephant sport hunting.
</td></tr>
</table>

Sustainable Use

DOCUMENT NAME	SAMPLE OF KEY QUOTATIONS
ZPWMA Apr. 2014 Response	- Allocation of quotas in hunting areas is based on a consultative process that involves ZPWMA authorities, hunters, safari operators, local communities, land owners, researchers, and NGOs. The participatory approach ensures that the quotas allocated for each hunting area are sustainable. (p. 4) - Factors considered for quota-setting annually (p. 20-22)

ZPWMA Dec. 2014 Response	- The quota-setting process is participatory involving private landowners, ZimParks and CAMPFIRE or local community wildlife managers. Quotas are set so as to have a representative number of animals that can be safely removed during a hunting season without inflicting biological damage to the population. The aim of quotas is to ensure that the utilization of wildlife is sustainable. Data on genetic drift, estimated population, disease outbreak, trophy size, age of animal hunted, habitat status and illegal offtake is used to safeguard sustainable quotas … Trophy quality is monitored and quotas are adjusted in order to maintain desired trophy quality. (p. 7-8) - As an example in 2014 to date over 90 cases of PAC have been reported whilst only 37 elephants have been killed. This is in line with the annual average offtake of 40 individuals [as PAC]. It is therefore not true to state that the number of elephants taken on PAC is equal to or may exceed the number of elephants taken on sport hunting. (p. 23) - In Zimbabwe, the quota setting process is participatory. This participatory quota setting process is ideal as it aims at having a co management approach where all the relevant stake holders become active participants who complement the Authority's efforts. Inputs into the quota setting process includes population estimates, densities, distribution patterns, habitat quality, trophy quality, hunting success rate, ranger based monitoring reports, environmental variations, natural mortality, capture and translocations, diseases, size of hunting area, management systems in place, CITES National Export quotas, trade and export data. Before any hunting takes place in Zimbabwe, the hunter has to have a hunting quota which will have been determined through an annual transparent consultative quota setting workshops. The workshops are done at local community and property level first and foremost. At this level stakeholders include: field managers, safari operators, technical specialists and local community. Secondly, the process then goes to a national quota setting level where the Scientific Authority in this case ZIMPARKS ecologists and all other stakeholders will be present. The Scientific Authority through an adaptive management process and rigorous resource monitoring programme, uses all the information generated to ensure that all off-takes are sustainable. Quotas can be reduced to allow recruitment into a population if there is a decline in trophy quality or low hunting success rate and other factors such as poaching. Quotas are therefore adjusted annually in response to prevailing conditions. As an example, the proposed 2015 sport hunting quotas were set in consultative workshops held at various centres around the country using a participatory approach taking into account factors that influence the ecological viability of the hunted species such as population numbers, spatial distribution, management practices (especially for private properties), illegal harvest levels, offtake rates (hunting success) and trophy quality trends. Preliminary results of the just concluded aerial census of elephants and other mega herbivores, trophy quality trends and offtake rates from the TR2 database were the main sources of information for input into the quota determination process. Overall, there

	were downward revisions for quotas for all the major species in the year 2015 except for crocodile. The proposed 2015 quotas for the other major species are as follows, (for comparison, 2014 quota are in brackets); Elephant 380 (500), Buffalo 1 268 (1 363), Leopard 500 (483) and Lion 74 (99). (p. 23-24)
ZPWMA July 2015 Response	- Elephant mortalities were recorded under various categories as shown in Table 9 below. The major causes of mortalities over the five year period are natural, poaching and sport hunting. It should be noted that other management off-takes entail ration and training quotas which were set at about 95 animals nationally for ZPWMA run areas. (p. 43) - Table 9: Causes of elephant death from 2010 to 2015 (p. 43) - Trophy hunting of elephants, or any wildlife species in Zimbabwe, is undertaken through a strictly regulated quota setting system. Quotas are issued each year to approved landholders by ZPWMA and this is done through national quota setting workshops. These workshops rely on information supplied by landholders as well as ecological reports submitted by Parks' ecologists and independent wildlife consultants … All offtakes for the African elephant in Zimbabwe are sustainable. Key factors that Zimbabwe considers when setting quotas are shown in the Table 10. (p. 43-44) - Table 10: Quota allocation for 2014 by major range (p. 44) - Table 11: Factors considered in quota setting (p. 44-46) - Quotas are set so as to have a representative number of animals that can be safely removed during a hunting season without inflicting biological damage to the population. The aim of quotas is to ensure that the utilization of wildlife is sustainable. Data on genetic drift, estimated population, disease outbreak, trophy size, age of animal hunted, habitat status and illegal off take is used to safeguard sustainable quotas. On average, quotas are set based on current data at approximately. The quota for 2016 is set at 400 elephant which is 0.49% of the national population. (p. 46) - Figure 8: Multi stakeholder participatory quota setting (p. 47)
ZPWMA, Non-Detriment Finding (2014)	- Trophy hunting of elephants is undertaken through a strictly regulated quota system. Quotas are issued each year to approved landholders by the Zimbabwe Parks and Wildlife Management Authority and non-detriment findings are conducted for all exports. Policies and legislation related to utilization of the African elephant are strictly adhered to and implemented. In areas where there is a decline in trophy quality, a hunting moratorium can be imposed to allow the population to recover as was the case with African lions North West Matabeleland from 2004 to 2008. Quotas are also reduced in areas where

	there is a decline in trophy quality. All the off-takes for the African elephant in Zimbabwe are sustainable. Key factors that Zimbabwe considers when setting quotas are shown in Table 8. (p. 25) - Table 8: Some key factors considered in quota setting (p. 26) - Figure 8: Export of sport hunted elephant trophies from Zimbabwe (2008 – 2013) Source: (TR2 Database ZPWMA 2014) (p. 31) - The ZPWMA has a comprehensive system to monitor off-takes from the elephant population. All field stations report on a monthly basis, animals killed through all forms of offtake. Safari operators are required by law to submit returns to the ZPWMA of all the animals taken through a Tourism Hunt Return Form (TR2). All elephants killed through Problem Animal Control (PAC) and recreational hunting are considered as part of the annual off-take quota to ensure that the offtakes are sustainable. Trophies taken on PAC cannot be exported. (p. 31) - Some elephants are taken in communal areas during problem animal management but the off-takes other very low and insignificant. In addition to problem elephant management, other elephant off takes are for training of ZPWMA staff and professional hunters on how to handle dangerous game and again the numbers are very low and insignificant. Private properties have approved Elephant Management Plans but apply for annual sport hunting and management quotas. For example, Save Valley Conservancy has an approved Elephant Management Plan for its closed elephant population. The elephant population is increasing in this closed system. On this private property, culling is done on an annual basis as a management tool to control the elephant population… (p. 31-32) - CONCLUSION: In view of the foregoing, Zimbabwe is making use of the best available scientific information on the status of the African elephant in the country to make non-detriment findings. The current harvest levels are not detrimental to the survival of the species. It is also evident that both quantitative and qualitative data is used in the decisionmaking process. The African elephant population in Zimbabwe is growing and that current levels of trade are not detrimental to the survival of the African elephant in the wild. The species exists and is well monitored throughout its range. In most of the areas where the elephant occurs however there is local over-abundance and severe habitat conversion. The Government of Zimbabwe has recently revised its policies and legislation to promote wildlife conservation and to support local community development programmes. Levels of harvest and quotas for the African elephant are determined through an adaptive management approach, using baseline data, monitoring the impacts of previous harvests and responding to environmental variations. It is evident that quotas and offtake levels for the African elephant fall within very safe and sustainable limits in Zimbabwe. Protocols for monitoring are in place but significant resources are required to carry out regular national aerial surveys. Efforts by the Government of Zimbabwe through the strict management

	regimes and trade controls promote the conservation of not only African elephant but other wildlife species. (p. 49-50)

ZPWMA, Legal Trade, Conservation and Rural Livelihoods: A Zimbabwean Perspective	- A hunting quota is a scientifically determined system of harvesting animals from a population without compromising its biological proliferation. In Zimbabwe determination and implementation of hunting quotas goes through a rigorous quota setting methodology that entails factoring population sizes, property (area) sizes, habitats, national policies among other parameters. With all the set parameters met, it is anticipated that biodiversity and hunting industry are sustained and the economy improves as the country maintains its position as a prime hunting destination. (p. 5)
	- [Factors considered in quota-setting (p. 6)]
	  - 1. CITES National Quota
	  - 2. National aerial survey results
	  - 3. Research publications and preliminary results
	  - 4. Off takes for key species including leopards, lion and elephant
	  - 5. Size of property relative to the species requested and distribution
	  - 6. Illegal Off-take/Poaching
	  - 7. Property based Ecological assessments
	  - 8. Management regime on the properties (habitat, fire, water, land-use planning and zonation, fencing, supplementary feeding).
	  - 9. Human wildlife Conflict hotspots, Communal Benefits and conflict mitigation
	  - 10. Species sensitivity
	  - 11. Other off-takes (illegal management offtakes, live sells)
	  - 12. Trophy Quality
	  - 13. Habitat Change/fragmentation
	  - 14. Recommended sustainable off-take levels
	  - 15. Offtake Data

CAMPFIRE Association Report	- A participatory quota setting methodology adaptively adjusts quotas in response to animal numbers, trophy quality, community monitoring, illegal off-take and safari operator "catch effort". (p. 3)
CAMPFIRE Income Analysis	- Figure 7: Numerical Elephant Quota and Take Off per District (p. 7)

SOAZ Report	- It is estimated that trophies of 160 sport hunted elephant are imported into the USA from Zimbabwe each year. If the information in Table 1 is extrapolated out for a quota of 160 elephant (I.e. multiply each figure by a factor of 1.45) then we can assume that the financial loss to Zimbabwe of the suspension will be in the region $4,878,452.50. It will have a direct impact on 126 Operators and Professional Hunters, 1132 staff, 355 anti poaching personnel and approximately 155,000 people living in rural communities. (p. 3)

Revenue Utilization

DOCUMENT NAME	SAMPLE OF KEY QUOTATIONS
ZPWMA Apr. 2014 Response	- The Parks and Wildlife Act Chapter 20:14 … recognises any land that is being used for wildlife conservation and designates the legal occupant of that land as Appropriate Authority. On communal lands/tribal Appropriate Authority is accorded to the Rural District Council. Appropriate Authority is the legal right to utilize and manage wildlife on the property under community jurisdiction. (p. 15-16) - The Zimbabwe Parks and Wildlife Management Authority, which is the Government's Agency responsible for managing all wildlife in the country ploughs back all the money into managing conservation and protection of the Parks Estate, which includes the range areas for elephants. (p. 25)
ZPWMA Dec. 2014 Response	- The Parks and Wildlife Act accorded Appropriate Authority status to communal and private property areas with significant wildlife populations which confer user rights to the property owners. Appropriate Authority allows the property owners or tenants to manage and benefit from the wildlife on their land. Local communities through CAMPFIRE programs participate in quota setting workshops in which local communities get the opportunity to learn wildlife management practices from the various technocrats who will be presenting their game management practices. The local communities also get an opportunity to market their offtake to safari operators, which if they get a hunting client, proceeds, are remitted to the community thereby improving their livelihoods. This arrangement incentivizes landowners and tenants to not only tolerate wildlife, but to conserve and promote conservation and protection of wildlife. ZPWMA also provides para-military training to Rural District Council game guards, to equip them with law enforcement and anti-poaching techniques. In the communal areas, ZPWMA is working towards increasing its network of informers to assist in intelligence gathering, a vital tool in the fight against poaching. (p. 20) - The current operating budget is estimated to be in excess of USD28 million. (p. 20)

	- Elephant hunting contributes in excess of USD$ 14 million every year … Approximately, 67% of the annual elephant export quota is allocated to local communities and private sectors with more than half of this going to local communities. It is worth noting that elephants contribute approximately 60% of total hunting revenue by Rural District Councils. Approximately 30% of the Authority's revenue is from hunting, of which the elephant is the major contributor. (p. 21)
ZPWMA July 2015 Response	- ZPWMA has a staff complement of 1,500 field rangers whose core mandate is anti-poaching activities. Table 5 below is an indicative budget for effective protection of the Parks and Wildlife Estates. Table 5: Budget for anti-poaching activities (p. 34-35) - The major sources of [budget] funds [for ZPWMA] are conservation fees (land and river) constituting a total of US$9 898 695 and hunting constituting a total of US$ 4 032 733 for 2014. The bulk of the revenue generated in ZPWMA goes towards staff costs (69%) and operation costs (18%) which translated to US$17,751,988 and USS 4,706,787 respectively for 2014 … Full details are specified in the attached approved budgets for 2015 (p. 36) - Table 7a: ZPWMA Actual and projected Budgets for 2014 and 2015 in USS (p. 37) - Table 7b: Expenditure for ZPWMA (p. 37) - Conservation fees (Park entry and fishing permits) and hunting revenue constitute the bulk of the sources of revenue for ZPWMA, with a contribution of 42% and 17% respectively. (p. 38) - Figure 5a: Main Sources of Revenue for 2014 (p. 38) - Figure 5b: Itemized costs for ZPWMA … Note: See attached approved budgets for 2015 for budget details. (p. 39) - The US hunting market constituted 51% and 54% of the elephant trophy hunting in Zimbabwe for the years 2013 and 2014 respectively. (p. 40) - Figure 6a: Source markets for Safari Hunting in Zimbabwe in 2013 from ZPWMA Database (p. 40) - Figure 7: Source markets for Sport Hunting in Zimbabwe in 2014 from ZPWMA Database (p. 41) - Hunting revenue is distributed by land-use categories as to sustain the upkeep of the land area where it is accrued. These land areas administered by different authorities with the ZPWMA having the overall authority to oversee wildlife use on these areas … Over a four year period revenue collected from hunting contributed a total of US$ 21,339,609. There was a 11.9% decrease in revenue collection from hunting in 2014 compared to 2013. Of all the hunting received the American market is estimated to 54% and is inclusive of concession fees and trophy fees. (p. 41)

<table>
<tr><td></td><td>
- Table 8a: Revenue collected from hunting within the parks Estate 2011 to 2014. (p. 41)
<table>
<tr><td></td><td>2011</td><td>2012</td><td>2013</td><td>2014</td><td>Totals</td></tr>
<tr><td>Total hunting revenue</td><td>5,362,198</td><td>5,144,579</td><td>5,760,339</td><td>5,072,493</td><td>21,339,609</td></tr>
</table>
- Across all land categories, the elephant, even in the private land category where only a small proportion of properties have elephants, accounts for the highest proportion of revenue. Table 12 below highlights elephant populations and revenue generated in the four land use categories in terms of trophy fees … The most important form of revenue is the trophy fees, which average US$ 10,000 per trophy elephant. Other forms of revenue include hunting daily rates and incidental revenue which can raise the value of an elephant hunt up to $25,000.00. (p. 48)
- Table 13: Staff costs incurred in Safari Areas (p. 49)
- The communal areas benefits from wildlife through the CAMPFIRE program. This program is key in that it helps to encourage the communities to co-existence with wildlife. (p. 50)
- During the 2014 hunting season, a total of about US$ 1,419,384.00 (costs including trophy fees, daily rates and concession fees) was realized as revenue from elephant hunts under the CAMPFIRE program. Revenue generated from the CAMPFIRE program is ploughed back into managing and protecting the wildlife resource through activities such as anti-poaching patrols, wildlife censuses and problem animal control (PAC), and wildlife surveys. … Table 14: Distribution of Revenue between Communities, RDC and CAMPFIRE Association. (p. 50-51)
- Table 15: The Distribution of CAMPFIRE Revenue by Communities. (p. 51)
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<tr><td></td><td></td></tr>
<tr><td>ZPWMA, Elephant Management Plan (2015-2020)</td><td>
- vi) Local communities: Local communities are involved in elephant management in CAMPFIRE areas, through sharing of information, advocacy and wildlife protection. They report human-elephant conflicts and carryout some of the conflict management activities. (p. 12-13)
- The Importance of Community Based Conservation to the Future of Elephant Management in Zimbabwe: The Community Areas Management Programme for Indigenous Resources (CAMPFIRE) of Zimbabwe has been widely regarded as one of Africa's most successful contemporary conservation initiatives. It permits the residents of communal lands – basically the poor rural communities – to share in the benefits generated by wildlife utilization on those lands by granting Appropriate Authority to Rural District Councils (RDCs) to manage wildlife on communal lands and requiring a certain percentage of revenue to be paid to the wards and councils. CAMPFIRE operates in about 50,000 km2 (12.7%) of land in Zimbabwe. This is roughly equivalent landmass to the Parks and Wildlife Estate. CAMPFIRE encompasses about 777,000 households with an average family size of five, who face food insecurity and deep poverty
</td></tr>
</table>

	(average income $1 a day). Between 1994 and 2012, CAMPFIRE generated $39 million of which $21.5 million was allocated to communities and used for resource management (22%), household benefits (26%), and community projects (52%). About 90% of CAMPFIRE's revenue comes from hunting, with elephant hunting contributing more than 70% of annual revenue. Based on the Constitution of the CAMPFIRE Association as amended in 2007, all major hunting RDCs use CAMPFIRE revenue-sharing guidelines. In these districts safari operators pay revenue directly into community-controlled bank accounts using the following breakdown: CAMPFIRE community share (55%), RDC fees (41%), CAMPFIRE Association levy (4%). Despite its achievements CAMPFIRE still faces fundamental challenges. In particular, the development strategies of households in CAMPFIRE areas focus on land uses that are incompatible with wildlife such as human immigration to rural areas, the extension of basic agricultural schemes and increased livestock numbers. Other CAMPFIRE challenges include: (i) the downturn in Zimbabwe's economy and tourism sector post-2000, (ii) great reliance on consumptive trophy hunting and less focus on other uses and non-consumptive uses of natural resources, (iii) increasing human populations averaging 16-20 people per km^2 in some key wildlife districts, and (iv) lack of re-investment in development, fixed assets, human capital, and management and protection of wildlife in CAMPFIRE areas. Despite these challenges, CAMPFIRE stands very high in the agenda of Zimbabwe's Government, and a review dedicated to improving the programme, including greater devolution of ownership of wildlife to communities, is ongoing and should be finalized by the end of 2015. Zimbabwe's Government recognizes that the survival of wild animals depends entirely on those among whom they live. Unless local people want to save them, wildlife will be poached to the point where just a few remain in fortified reserves. CAMPFIRE is meant to avoid this and the future of wildlife in communal areas rests on the success of this programme. (p. 12-13, Box 2) - 1.3.8 Human elephant conflict: As Zimbabwe's human population grows, elephant are being restricted to smaller areas and as their populations expand they increasingly move out of their designated habitat, and raid crops and sometimes threaten human lives. As a result in many rural areas where elephants exist in Zimbabwe, human-elephant conflicts are increasing, creating substantial negative attitudes to the conservation efforts of elephants. These are often among the poorest rural farmers, which makes the issue complex in social and economic terms. Unresolved conflicts stimulate poaching or retaliation. Poachers or retaliators can be seen as "local heroes" because they provide meat to the communities and resolve the conflict. A major challenge for elephant management is keeping human-elephant conflicts to a minimum. Developing a Social, Economic, and Cultural Framework has been identified as a Key Component of this Action Plan in an effort to address and reduce human-elephant conflicts. (p. 15) - Towards a Comprehensive Strategy to Reduce Human-Elephant Conflict: Some methods of reducing human-elephant conflict focus on curing the effects, not the cause. Such methods include chilli sprays,

	fences, and evening patrols to scare off marauding elephants. However, these are not necessarily long-term solutions. Long-term solutions require growing the tolerance of local communities for elephant by ensuring the communities benefit from having elephant on their lands. Tolerance is likely to increase if communities realise and appreciate economic returns earned from the sustainable use of elephant. Economic returns may be generated by consumptive and non-consumptive tourism. The devolution of decision-making on aspects of problem animal control to communities may result in better outcomes for the management of the costs and benefits of this activity. Problem animal control includes disturbing, removing, translocating, or ultimately killing those elephant that persist in damaging crops or threatening human life. Clearly, no one management option will successfully deal with all problem elephants and conflict situations. As part of this Action Plan, ZPWMA will undertake additional research on problem animal control and minimizing conflict, and will develop new solutions and a more comprehensive response to these issues. (p. 15, Box 4)
ZPWMA, Elephant Management Plan Supplement (2016)	- Table 1: Financial resources deployed up to August 2016 (p. 1) - Table 2: Other Non-Financial Resources (p. 2) - Constraints and Challenges: One of the major challenges regarding implementation of the EMP is with regards to the adoption of stricter domestic measures by the United States of America. This has had the net effect of further reducing the revenue from hunting into the Authority, which therefore affects the budget allocated to resource protection, in particular the elephant in this case. One of the key impediments towards the full and comprehensive implementation of the Elephant Management Plan is the limited resources. However, Zimbabwe is at an advanced stage in the development of resource mobilisation strategies. These strategies include partnering with both local and international institutions in resourcing and financing aspects of the programme. (p. 2-3)
ZPWMA, Non-Detriment Finding (2014)	- In Zimbabwe a foreign hunter buys a bag which may or may not include an elephant. If an elephant is included, the amount paid increases. The amount declines depending on key species in the bag such as leopard and buffalo. A foreign hunter pays to the operator who then pays to the Authority relevant trophy fees where applicable. A hunting permit is only issued to the hunting operator or a private land holder or to communities with Appropriate Authority Status. The foreign hunter only pays for the daily rates and trophy fees to the particular operator they will be hunting with. Both the daily rates and trophy fees vary with the area being hunted, type of animals in the hunting package and the target market of the operator. The daily rate is paid for services received in camp which include accommodation, food and beverages, professional hunter services etc. The hunter also pays government

	levies which are 2% Zimbabwe Tourism Authority levy on daily rate and 4% on trophy fees … The Zimbabwe Parks and Wildlife Management Authority, which is the Government's Agency responsible for managing all wildlife in the country ploughs back all the money into managing conservation and protection of the Parks Estate, which includes the range areas for elephants. (p. 37) - Communities are provided for through the Communal Areas Management Programme for Indigenous Resources of Flora and Fauna. Some of the revenue that accrues to Rural District Councils under this program is ploughed back into wildlife conservation activities in CAMPFIRE areas. Proceeds are used directly for elephant conservation, provision of game water supplies, wildlife monitoring and anti-poaching programs on communal land as well as community development programmes in the form of schools, clinics, roads and other infrastructural development projects. (p. 37) - The centralised command and control approach to law enforcement to protect the elephant is unlikely to work as proved in most parts of Africa. The long-term solution is to ensure greater return of elephants to the community. Conservation of elephants will be achieved as a by-product of the quest for sustainability. (p. 37) - Resources Available For Law Enforcement and Fire Management: A total of 1,346 of the 1,437 recruited rangers were available for deployment against a field ranger establishment of 2,200. The current ranger complement is able to cover 29,120 km^2 giving a variance of 33, 110 km^2 from the total Parks area of 62, 230 km^2. As at 31 December 2013, the Authority had a total of 103 vehicles for field law-enforcement duties and only 69 vehicles were operational. Ideally the Authority should have 150 vehicles dedicated for law enforcement duties. Thirteen (13) of the vehicles were received from donors. The Authority also bought 7 vehicles and 2 boats. 38 radios and 3 repeater links were also procured. Due to financial constraints, the Authority is not able to procure all of its transport (vehicle and fuel) requirements including field equipment and patrol kits. The rangers for field patrols are also not adequate. Table 11 below shows the ranger staffing levels, vehicles and boats status in the Authority in 2013. (p. 39) - Table 11: Status of Rangers, Vehicles and Boats in 2013 (p. 39)
ZPWMA, Legal Trade, Conservation and Rural Livelihoods: A Zimbabwean Perspective	- Zimbabwe's Protected Area Management Funding (table) (p. 10) - As shown in the Table above, CAMPFIRE income is often understated as it is largely recorded based on income receipts from safari hunting only. Economic multipliers like taxidermy, travel, extended tourism activities, food and others, are not captured as part of CAMPFIRE income. The proportion of safari operating expenses paid locally in the form of wages and salaries, and purchase of materials is also not recorded. Income from tourism ventures under CAMPFIRE is also mostly unrecorded, as a result of low investment and returns due to the current downturn in tourism receipts for the country. (p. 17)

	- American clients generally constitute 76% of hunters in CAMPFIRE areas for all animals hunted each year. The suspension of ivory imports from Tanzania and Zimbabwe by the United States of America (USA) in April 2014 resulted in the cancellation of 108 out of 189 (57%) elephant hunts initially booked by US citizens in CAMPFIRE areas. As a result of the ban, CAMPFIRE income dropped to US$2,1 million in 2014, compared to US$2,3 million in 2013, as fewer American hunters conducted their safaris nevertheless in anticipation of the lifting of the ban. However, the ban continued into 2015, resulting in a massive decline of total CAMPFIRE income to US$1,6 million. (p. 19)
CAMPFIRE Association Report	- CAMPFIRE generates on average US$2 million in net income every year … mostly through the lease of sport hunting rights to commercial safari operators (p. 1) - … the CAMPFIRE program at national level still protects an area of wild land in excess of 50,000 km^2, which is roughly equivalent in extent to the Parks and Wildlife Estate (Table 1). There are over 200,000 households that actively participate in the Program in CAMPFIRE hunting areas. Revenue received by communities, though relatively small, is used to directly offset the costs of living with wildlife through employment of game scouts or resource monitors. (p. 2) - Revised CAMPFIRE Revenue Sharing Guidelines, which were incorporated into the Constitution of the CAMPFIRE Association (CA) in 2007, prescribe that at least 55% of revenues should be devolved to producer communities, no more than 26%, and 15% for management and overheads (respectively) at RDC level, and 4% as a levy to the CAMPFIRE Association. At least 10 RDCs are in compliance with the Revenue Guidelines, and in these districts CAMPFIRE revenue is paid directly into community controlled bank accounts by safari operators (Table 4). (p. 3-4) - An analysis of data presented in October 2013 … provides an estimated total of US$2,496,349 from hunting in 2012 (Table 5). Hunting contributes an average of 90% of CAMPFIRE revenue annually. (p. 4) - An assessment of 18 main CAMPFIRE districts allocated hunting quotas for 2014 shows that 106 out of 167 Bull Elephant hunts were booked by US citizens (Table 6). Elephant trophy hunting contributes more than 70% income to the CAMPFIRE program. (p. 4) - Photographic tourism contributes an estimated 1.8% of total CAMPFIRE revenue annually according to 2006 evaluation reports on CAMPFIRE (Table 7). (p. 6) - In all CAMPFIRE districts, revenue from hunting is used to support various management activities such as; fire awareness and purchase of fire-fighting equipment; opening of roads and fireguards; training of committees; look and learn tours to other CAMPFIRE districts; purchase of communication equipment; purchase of firearms for Resource Monitors; and rehabilitation of water supply systems to hunting areas. CAMPFIRE thus contributes to job creation, empowerment, and diversification of livelihoods for rural

	communities. Substantial investments are also made annually by RDCs and safari operators in problem animal control (PAC) and anti-poaching. (p. 8) - Most of the income has been invested in infrastructure which has long term benefits to local communities. Infrastructure such as clinics, schools, and grinding mills, boreholes, roads, fencing to keep out wildlife, has been set up in a number of districts (Table 10). Purchase of tractors and drought relief food by communities has also contributed to food security in many drought prone CAMPFIRE areas. Children benefit from reduced walking distances through the construction of schools in the wards. Others benefit through procurement of learning materials and payment of school fees from CAMPFIRE proceeds. Communities also benefit from meat from safari hunting operations and occasionally from problem animal control. (p. 8-9) - Table 10: Summary of CAMPFIRE Revenue Funded Projects per District (p. 9)
CAMPFIRE Income Analysis	- In 2014, … CAMPFIRE generated a total net hunting income of US$2,102,007 in 13 districts of Zimbabwe that hunt most species, including elephant. … The major hunted species is elephant, which contributed 54% (US$1,138,375.09) of the total income. (p. 1) - Table 1: Income generated by Elephants vs. Total Income; and Percentage Income (p. 2) - Figure 6: Total Hunting Income for 12 Districts: 2009-2014 (p. 5) - As shown in Figure 6, it is highly probable that the decline in hunting income for 2014 was largely caused by the suspension of trophy imports by United States of America. The suspension has a lag effect on income, and preliminary calculations of earnings for 2015 indicate a further continuing decline. The major contributor to hunting income, elephants, had a 52% off-take rate in the 13 districts (animals hunted vs the quota). Seven districts out of 13 had an elephant off-take rate below 50% as shown in Figure 6. (p. 6) - Table 2: Examples of Community Projects funded from CAMPFIRE Revenue: 2010-14 (p. 7-8)
CAMPFIRE—Role of Hunting Report	- The income generated from trophy fees in the last 6 years (2010 – 2015) is approximately US$11.4 million of which elephant trophy fees contributed 65%, while a further US$4 million has come from the sale of hides, concession fees and other sundry income. These funds have been distributed to CAMPFIRE communities in various Wards who received approximately 57% (range 39% - 77%) of the Trophy Fees … At the District level, approximately 80% of the funds are used to support the administration and management of the CAMPFIRE program, including investment on law enforcement. In contrast, 55% of revenues provided to the producer Wards are channeled towards supporting social services such schools,

	clinics and other programs that benefit the community. The cost of living with wildlife, and particularly elephants, is shown through providing data on the scale of crop damage (7,000ha over 6 years) that has a significant impact in terms of its monetary value on rural communities who face food insecurity and deep poverty (average income US$1 a day). 96 human lives were lost to wildlife attacks, with elephant accounting for more than half of those deaths. Yet despite these challenges, communities still retain a high level of tolerance for elephants, but this support is rapidly dissipating as a result of the loss of income from trophy hunting. This places almost two million hectares of wild land at risk, including the risk of increasing retaliatory killing through poisoning and illegal wildlife crime. A way forward is discussed outlining how the resumption of trophy imports can offset the challenges facing the CAMPFIRE program and through this, enhance the conservation of elephant outside of the protected areas. (p. ii)
	- In summary, CAMPFIRE protects about 50,000 km^2 (12.7%) of land in Zimbabwe (Figure 1). Benefits from wildlife and other incomes encompass:
	  - Approximately 777,000 households (25%) in Zimbabwe benefited from CAMPFIRE directly or indirectly;
	  - Approximately 25% of Zimbabwe's people are receiving incentives to conserve wildlife and prevent anti-poaching through CAMPFIRE;
	  - Between 1994 and 2012, CAMPFIRE generated US$39 million of which US$21.5 million was allocated to communities and used for resource management (22%), household benefits (26%), and community projects (52%).
	  - About 90% of CAMPFIRE revenue comes from hunting with elephant hunting contributing up to 70% of annual revenue.
	  - Based on Constitution of the CAMPFIRE Association as amended in 2007, all major RDCs use CAMPFIRE revenue sharing guidelines, and in these districts revenue is paid directly into community controlled bank accounts by safari operators using the following guideline: RDC fees (41%), CAMPFIRE Association Levy (4%), and CAMPFIRE community (55%). (p. 5)
	- The CAMPFIRE program relies almost exclusively on income from hunting. (p. 5)
	- Figure 2: Total allocation of trophy elephant (N=1087) to nine major CAMPFIRE areas over a 6-year period (p. 7)
	- A total of 1,087 elephants have been allocated on quota to nine major CAMPFIRE areas since 2010 (Figure 2). This equates to 180 elephants per year. The distribution of this quota among the nine CAMPFIRE areas is dictated by the relative density of elephants in the neighboring protected areas and those residing in the CAMPFIRE areas. Tsholotsho, for example, that borders the southern boundary of Hwange National Park, was allocated 158 elephants (or 26/year) while Hwange, Binga and Hurungwe

	CAMPFIRE Areas that do not border onto areas of high elephant densities receive approximately 10 elephants/year. (p. 7) - Figure 3: Overall utilization (%) of elephant quotas in nine major CAMPFIRE Areas over a 6-year period (p. 8) - Table 2: Origin of hunting clients visiting the major CAMPFIRE Areas :2010 – 2015. (p. 8) - Figure 4: Contribution of hunting clients to the CAMPFIRE Program (p. 9) - Figure 5: Income (US$) generated from the sale of key trophies (p. 10) - The importance of the income from elephant is clear from these data. Trophy fees from elephant account for 64% of all fees generated from the key species (approximately US$1.2 million/year). Buffalo (20%) are ranked second while leopard, hippo and crocodile contribute approximately 5% each. Noteworthy here is the low contribution of lion (approximately 2%). This low level of income generation is partly a result of the impact of the lion import suspension into the USA and Europe, decreasing quota allocations and decreasing offtake levels brought about by the recently imposed lion age hunting regulations. By comparison, the 897 American clients who hunted in CAMPFIRE Areas in the six-year period paid US$9 million in trophy fees and daily rates. Other nationalities, contributed US$8 million. (p. 10) - RDCs can generate income for other revenue streams, notably receiving a percentage of the daily rate, concession fees, bed night levies from photographic camps and from the lease/rent of equipment (Figure 6). The eight RDCs for which data are available generated approximately US$4 million from these revenue streams. Excluded here are revenues that could have been earned from the sale of ivory recovered from problem animal control (PAC) and natural deaths, and from the distribution of meat estimated at 550,000kg over the 6-year period. (p. 10) - Figure 6: Income (US$) accruing to the RDCs from related income revenue streams (p. 10) - Over the last 6 years, the income generated from trophy fees is approximately US$11 million while a further US$4 million has come from the sale of hides, concession fees and other sundry income. The agreed split of these funds is that not less than 55% of the revenues is paid as Ward dividends, not more than 35% is allocated to the RDC for wildlife management (habitat management, fire control, monitoring, hiring of game scouts, etc.), and 15% is retained by the RDC as an administrative levy. Some RDCs do not consider all these revenues as “CAMPFIRE Funds” and segregate trophy fees from the other revenues. On average, the CAMPFIRE District Wards received 42% (range 23% - 66%) of the combined Concession and Trophy Fees, but the Wards received approximately 58% (range 26% - 77%) of the Trophy Fees (Table 3). (p. 11)

	- Table 3: Summary of the benefit sharing (US$) of hunting related income between RDCs and Wards: 2010 – 2015 (p. 12) - Most RDCs employ Game Scouts to conduct routine patrols and undertake basic law enforcement activities. In most cases this is low key since the CAMPFIRE program relies on members of the community to report incidents of wildlife crime, and any other matters related to wildlife in their respective Wards and villages. (p. 14) - Although the data are incomplete, it is estimated that 7,000ha of crops were destroyed by elephant during the 6-year period under review. It is not possible to accurately place a monetary value to this because crop production varies greatly from one year to the next, and from one region to another. It is important however to take into consideration that the impact of crop destruction in the highly prone drought areas and areas of low rainfall (e.g. Beit Bridge, Binga, Tsholotsho) is more acute than in areas where crop production may be higher. To place this into perspective, the national average maize yield is estimated at 300 – 600kg/ha, and the minimum cash value is US$180/ton. The approximate value of the maize lost is therefore US$500,000 – US$1.0 million … (p. 18) - Table 8: Summary of the extent of human – wildlife conflict recorded in CAMPFIRE Wards: 2010 – 2015 (p. 18) - Table 10: Examples of Social Services funded in selected CAMPFIRE areas from Ward Revenues generated from sport hunting: 2010-15 (p. 20) - The income to CAMPFIRE from the sustainable use of elephants has been declining since 2013, with 2014 registering a significant drop following the announcement of the ban on ivory imports into America (Figure 9). Although the hunting industry responded by seeking alternative markets (e.g. Russia, Middle East), this trend continued through 2015 and unconfirmed reports suggest that the decline has continued in 2016. (p. 22) - Figure 9: Annual income (US$) and offtake of elephants in 10 CAMPFIRE Districts (p. 23) - It is difficult to show concisely how the American ban on importation of elephant ivory from Zimbabwe has contributed to the decline in CAMPFIRE revenue and how hunting has enhanced the conservation of this species, due to the nature of the hunting industry in the CAMPFIRE areas. The hunting sector is integrated across a wide range of socio-economic activities and withdrawing one segment adversely affects a range of other wildlife based activities. Several indicators are provided here to demonstrate this: - 1. The US suspension of ivory imports from Zimbabwe has had a significant impact on CAMPFIRE, and resulted in the cancellation of 108 out of 189 (57%) elephant hunts in all major districts initially

	booked by US citizens in 2014. The net impact of this was a reduction of CAMPFIRE income for all areas from US$2.2m in 2013 to US$1.7m in 2014. A similar pattern prevailed in 2015 (US$1.6m), and a further decline is anticipated in 2016 where outfitters struggled to sell elephant safaris and those that did had to heavily discount their prices. - 2. The key trophy species (elephant, buffalo, leopard, hippo, crocodile and lion) contribute approximately US$1.2 million/year to CAMPFIRE revenues. Elephant account for 64% of these fees. (p. 22) - 3. Quota utilisation of elephant prior to the ban did not exceed 60% of the CAMPFIRE quota allocation. - 4. American hunters make up 53% of the clients in CAMPFIRE areas. - 5. CAMPFIRE producer Wards receive on average 57% of all trophy revenues. - 6. The CAMPFIRE hunting industry in the 9 RDCs covered in this analysis directly supports 104 producer Wards, representing 737 villages or 85,847 households. - 7. The CAMPFIRE program employs managers, officers and game scouts at both the District and Ward level who are responsible for monitoring wildlife based land use activities in their areas and these are directly paid from safari hunting income. - 8. Both RDCs and Wards invest in a variety of equipment that benefits communities and wildlife management. The operational and maintenance costs for this equipment are drawn from safari hunting income. - 9. RDCs utilise 80% of the CAMPFIRE revenues to support administration and management of the program. 20% is invested in global social services that benefit communities at the District level. - 10. Producer Wards, representing approximately 2.6 million hectares, bear the cost of living with wildlife. Under the 6-year period under review, elephants are responsible for the destruction of approximately 7,000ha of croplands in the 9 Districts. The minimum cost of this in terms of food production is estimated at US$500,000 – US$1.0 million. - 11. Producer Wards have elected to invest 55% of their dividends from CAMPFIRE revenues in social services (schools, clinics etc.). 74% of these revenues are generated through trophy fees where elephant play a significant role. - 12. Although CAMPFIRE communities suffer most from elephant crop damage, the number of elephant destroyed as problem animals is well within acceptable limits and with few exceptions, has little or no impact on population numbers. (p. 23) - In conclusion, the CAMPFIRE program relies almost exclusively on revenues generated through hunting. These revenues cannot be replaced through alternative wildlife based activities. This places almost two million hectares of wild land at risk, including the risk of increasing retaliatory killing through poisoning

	and illegal wildlife crime. Wildlife in Communal Lands is under pressure. Removing any benefits will tip the balance and disgruntled CAMPFIRE communities will turn to pastoralism and unsustainable agricultural practices, thereby reducing wildlife habitat. The suspension of trophy imports is effectively encouraging communities to become willing tools for poaching – a forced abandonment of CAMPFIRE. (p. 23) - The presence of regulated hunting can also reduce illegal activities, and private outfitters' lease agreements are being reviewed to include anti-poaching as an obligation of the concessionaire. Trophy hunting revenues are vital to facilitating not only law enforcement activities but also general wildlife management. Alternative wildlife land use practices, e.g. eco-tourism, cannot generate sufficient revenues to cover these costs, and certainly not to justify wildlife as a land use outside of protected areas. Hunting can generate revenues under a wider range of scenarios than eco-tourism, including in remote areas lacking infra-structure, attractive scenery, or high densities of viewable wildlife. Consequently, elephant and other wildlife populations will be negatively affected through reduced conservation efforts arising from low funding and reduced goodwill from the communities. CAMPFIRE has been widely regarded as one of Africa's most successful contemporary conservation initiatives. Hunting of elephants plays an integral part in promoting CAMPFIRE as it permits the residents of communal lands to share in the benefits generated by wildlife utilization on those lands. (p. 24) - As shown above, the bulk of CAMPFIRE's revenue comes from hunting, with elephant hunting contributing more than 60% of annual revenue. The current revenue sharing guidelines require safari outfitters to pay revenue directly into community-controlled bank accounts and this has had a positive impact on community attitudes to wildlife conservation. These funds have been used by RDCs and producer Wards to promote wildlife conservation, but despite its achievements, CAMPFIRE still faces fundamental challenges. The most crucial of these challenges is developing strategies to accommodate the increasing human populations averaging 16-20 people per km^2 in some key CAMPFIRE areas. Understandably, the focus of these households is on food security requiring the extension of basic agricultural schemes and increased livestock numbers. Such land uses are incompatible with wildlife based land use … Despite these challenges, CAMPFIRE stands very high in the agenda of Zimbabwe's Government, and an evaluation dedicated to improving the program is ongoing and should be finalized by the end of 2017. Zimbabwe's Government recognizes that the survival of wild animals depends entirely on those among whom they live. Unless local people want to save them, wildlife will be poached to the point where just a few remain in fortified reserves. CAMPFIRE is meant to avoid this and the future of wildlife in communal areas rests on the success of this program. (p. 24) - The hunting of elephants, under sustainable and well-regulated conditions, has the potential to raise adequate funds to support itself and other species in CAMPFIRE areas. For these reasons, Zimbabwe

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<tr><td></td><td>confirms its commitment to the sustainable use of elephant and other wildlife in its Elephant Management Plan, and recognizes the role that elephant play in the CAMPFIRE program. (p. 25)</td></tr>
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<tr><td>SOAZ Report</td><td>
- The results of questionnaire responses from 14 safari operators indicate that for the 110 elephant on quota between them, there will be a combined financial loss of $3,364,450 to them and to Zimbabwe (Table 1). This will have a direct impact on 87 operators and Professional Hunters, 781 Staff, 245 Anti poaching personnel and approximately 108,000 people in rural communities living with elephants. (p. 3)
- Table 1. Results to show the number of dependents, elephant on quota and the loss of revenue and hunting days as a result of the US Fish & Wildlife Services suspension on import of elephant trophies for 14 Safari Operators in Zimbabwe (p. 3)
<table>
<tr><th colspan="4">Dependents</th><th rowspan="2">Number of Elephant on Quota</th><th rowspan="2">Hunting Days Lost Suspension</th><th rowspan="2">Value of Loss</th></tr>
<tr><th>Operator & PH's</th><th>Staff</th><th>Anti Poaching</th><th>Com-munity</th></tr>
<tr><td>87</td><td>781</td><td>245</td><td>108312</td><td>110</td><td>1430</td><td>US$3,364,450.00</td></tr>
</table>
- It is estimated that trophies of 160 sport hunted elephant are imported into the USA from Zimbabwe each year. If the information in Table 1 is extrapolated out for a quota of 160 elephant (I.e. multiply each figure by a factor of 1.45) then we can assume that the financial loss to Zimbabwe of the suspension will be in the region $4,878,452.50. It will have a direct impact on 126 Operators and Professional Hunters, 1132 staff, 355 anti poaching personnel and approximately 155,000 people living in rural communities. (p. 3)
- Table 2 shows that the 14 Safari Operators that responded to the questionnaire spent a combined total of $957,843.00 on anti poaching in their areas and this employs 245 people specifically for anti poaching. (p. 4)
- Table 2. The expenditure on Anti Poaching and number of Anti Poaching personnel employed by 14 Safari Operators in Zimbabwe (p. 4)
<table>
<tr><th>Anti Poaching expenditure – 2013</th><th>Anti Poaching Personnel Employed</th></tr>
<tr><td>US$957,843.00</td><td>245</td></tr>
</table>
- As in Section 3, if these figures are extrapolated out to give figures relative to the 160 sport hunted elephant imported into the USA each year from Zimbabwe, we can make the assumption that US hunters are assisting with the funding of $1,388,872.35 towards anti poaching in Zimbabwe through their safari
</td></tr>
</table>

	payments and that this is enabling the employment of 355 anti poaching personnel along with all the equipment and support required. The imposed suspension on the import of sport hunted elephant into the USA from Zimbabwe will have a significant detrimental impact on these figures and in many cases the anti poaching efforts will not be sustained. (p. 4)
FWS Press Release	- Legal, well-regulated sport hunting, as part of a sound management program, can benefit the conservation of listed species by providing incentives to local communities to conserve the species and by putting much-needed revenue back into conservation. At this time, the Service does not have conservation concerns with African elephant sport hunting in Namibia, South Africa, or Botswana; though it should be noted that Botswana is not currently open to elephant sport hunting.

Local Conservation Efforts

DOCUMENT NAME	SAMPLE OF KEY QUOTATIONS
ZPWMA Apr. 2014 Response	- The Parks and Wildlife Act Chapter 20:14 … recognises any land that is being used for wildlife conservation and designates the legal occupant of that land as Appropriate Authority. On communal lands/tribal Appropriate Authority is accorded to the Rural District Council. Appropriate Authority is the legal right to utilize and manage wildlife on the property under community jurisdiction. (p. 15-16)
ZPWMA Dec. 2014 Response	- The Parks and Wildlife Act accorded Appropriate Authority status to communal and private property areas with significant wildlife populations which confer user rights to the property owners. Appropriate Authority allows the property owners or tenants to manage and benefit from the wildlife on their land. Local communities through CAMPFIRE programs participate in quota setting workshops in which local communities get the opportunity to learn wildlife management practices from the various technocrats who will be presenting their game management practices. The local communities also get an opportunity to market their offtake to safari operators, which if they get a hunting client, proceeds, are remitted to the community thereby improving their livelihoods. This arrangement incentivizes landowners and tenants to not only tolerate wildlife, but to conserve and promote conservation and protection of wildlife. ZPWMA also provides para-military training to Rural District Council game guards, to equip them with law enforcement and anti-poaching techniques. In the communal areas, ZPWMA is working towards increasing its network of informers to assist in intelligence gathering, a vital tool in the fight against poaching. (p. 20) - ZPWMA strongly believes that local effort has played a major role in elephant conservation.

	- Safari operators in the field are cooperating with Government agencies in anti-poaching and intelligence gathering. Very often they generally provide transport and other resources to rangers. - NGOs have played a pivotal role in supporting elephant surveys, game water supply and research. - Private owned conservancies provide key habitats for elephants outside the protected area system, including law enforcement and research into elephant population dynamics. In some communal areas, land has been set aside as wildlife management areas. Many farmers with wildlife on their properties are receiving technical assistance on wildlife conservation including intensive breeding and ranching operations. (p. 25) - Fundamentally, ZimParks supports local efforts by providing a conducive legislative and policy environment which allows the private and community sectors to thrive. The granting of Appropriate Authority Status to private properties and Rural District Councils is a case in point. - In addition, we also do the following: - share anti-poaching intelligence with the stakeholders - hold joint patrols and send reinforcements when required - restocking - offer technical advisory services - collaborate in implementing the TFCA Programme - Partnerships and joint ventures (p. 26) - Mechanisms have been put in place such as tax incentives to promote and sustain efforts across Zimbabwe's elephant range. The Parks and Wildlife Act accorded Appropriate Authority status to communal and private properties areas with significant wildlife populations which confers user rights to the property owners. Appropriate Authority allows the property owners or tenants to manage and benefit from the wildlife on their land in a coordinated manner. This arrangement gives incentives to landowners and tenants to not only tolerate wildlife, but to conserve and promote conservation and protection of wildlife. The Wildlife Based Land Reform Policy and other related policies; measures have been put in place to encourage wildlife production in areas that are not suitable for agriculture... (p. 26)
ZPWMA July 2015 Response	- The communal areas benefits from wildlife through the CAMPFIRE program. This program is key in that it helps to encourage the communities to co-existence with wildlife. (p. 50)
ZPWMA, Elephant Management Plan 2015-2020	- The Role of Sport Hunting in Elephant Conservation: Elephants are a charismatic species but can also be destructive when they destroy crops, threaten livestock and even human lives. To have a future, elephants must have value. Value to the governing authorities and to the local people. The greater the

	value, the greater the tolerance of them is likely to be. The local people who live closest to them will determine the long-term survival of species like elephant. Regulated sport hunting converts wildlife into assets for the benefit of local people and the country as a whole. Wildlife can be a most valuable asset and in turn empower local communities and provide basic necessities. When it is viewed as a valuable asset, wildlife becomes an economically competitive land use in Zimbabwe, which leads to habitat preservation instead of habitat destruction and conversion to agriculture or livestock production. Game animals have a survival advantage because of user-pay stewardship systems where use revenue generated from tourist hunters is paid through to wildlife authorities and local communities. The presence of regulated hunting can also reduce illegal activities. Many hunting operators in Zimbabwe have specialised anti-poaching units. Private operators' lease agreements are being reviewed to include anti-poaching as an obligation of the concessionaire. Regulated hunting is the opposite of poaching. One is a lawful activity designed by government wildlife authorities and experts to perpetuate resources and the other is prohibited thievery outside of and away from the system. The first is like making a bank deposit and the second is like a bank robbery, without sustainable limits. Trophy hunting revenues are vital because there are not enough tourists to otherwise generate income to support all protected areas. Eco-tourism revenues are typically sufficient to cover the costs of only some of the parks and certainly not to justify wildlife as a land use outside of protected areas. Hunting is able to generate revenues under a wider range of scenarios than eco-tourism, including in remote areas lacking infra-structure, attractive scenery, or high densities of viewable wildlife. Consequently, elephant and other wildlife populations will be negatively affected through reduced conservation efforts arising from low funding and reduced goodwill from the communities, when in reality the elephant has the economic potential to raise adequate funds to support itself and other species. For these reasons, Zimbabwe confirms its commitment to the sustainable use of elephant and other wildlife in this Action Plan. (p. 12, Box 1) - v) Private sector: The corporate community participates in elephant management mainly through resource mobilization. Safari operators report poaching and assist in anti-poaching patrols. Through lease and trophy fees they provide revenue to ZPWMA. They help develop infrastructure, provide funds to communities and supplement diets with meat from trophy animals. Zimbabwe subscribes to the principle of sustainable utilisation of wildlife resources including elephants. Sport hunting is the principal form of wildlife utilisation whereby offtakes are adaptively managed and monitored through a participatory and science based process. This process allows for sustainable offtakes, and rigorous resource monitoring programmes that allow recruitment within a population to ensure the continued survival of the population in the wild. The high economic value conferred to the elephant through consumptive utilisation has also resulted in increased tolerance by local communities. (p. 12)

ZPWMA, Non-Detriment Finding (2014)	- The centralised command and control approach to law enforcement to protect the elephant is unlikely to work as proved in most parts of Africa. The long-term solution is to ensure greater return of elephants to the community. Conservation of elephants will be achieved as a by-product of the quest for sustainability. (p. 37)
SOAZ Report	- We have received information from fourteen safari operators in Zimbabwe. The operations of these companies cover a wide range of safari concessions including Government Safaris Areas, Campfire Areas and Private Conservancies. They also include safari concessions in the three main wildlife systems in Zimbabwe being; (1) Zambezi Valley and Sebungwe, (2) the North West including Hwange/Matetsi/Vic Falls and (3) the South & South East Lowveld including Gonarezhou, Save Valley Conservancy & Bubye Conservancy. (p. 1) - The results of questionnaire responses from 14 safari operators indicate that for the 110 elephant on quota between them, there will be a combined financial loss of $3,364,450 to them and to Zimbabwe (Table 1). This will have a direct impact on 87 operators and Professional Hunters, 781 Staff, 245 Anti poaching personnel and approximately 108,000 people in rural communities living with elephants. (p. 3) - While National Parks provide the primary refuge for elephant populations in Zimbabwe, a significant proportion of elephant live in the safari areas which are generally more marginal in terms of wildlife numbers and often have large rural human populations within or adjacent to them. The role of safari operations in providing a benefit to such communities and enforcing anti poaching as a means of maintaining elephant and other wildlife populations in these areas cannot be underestimated. (p. 4)
FWS Press Release	- In Zimbabwe, available data, though limited, indicate a significant decline in the elephant population. Anecdotal evidence, such as the widely publicized poisoning last year of 300 elephants in Hwange National Park, suggests that Zimbabwe's elephants are also under siege. - Legal, well-regulated sport hunting, as part of a sound management program, can benefit the conservation of listed species by providing incentives to local communities to conserve the species and by putting much-needed revenue back into conservation. At this time, the Service does not have conservation concerns with African elephant sport hunting in Namibia, South Africa, or Botswana; though it should be noted that Botswana is not currently open to elephant sport hunting.

Botswana is renowned for its spectacular wildlife and pristine wilderness areas and, unlike other African countries, it is winning the war against rampant poaching.

Botswana is a peaceful country, and save for a small misunderstanding with its northern neighbour Namibia about an island in the Chobe River, there have been few instances where its highly trained army has been put to use in an incident of potential conflict.

The northern boundary of the country with Namibia is also where some of the country's richest wildlife areas are located, and where there was an issue with cross-border poaching in the 1990's. The army was in the area patrolling the border and it made sense to use them to protect the wildlife. The then head of the Botswana Defence Force was Ian Khama, a wildlife enthusiast and now president of Botswana, and he formed an anti-poaching unit to assist in the battle against poaching.

So successful was this unit that it became a permanent arm of the Botswana Defence Force and was the subject of a successful National Geographic Document titled Wildlife Warriors.

Tourism Philosophy

Botswana has one of the highest conservation land ratios in Africa with more than 25 percent of the land area set aside for parks and reserves to conserve the national heritage of the country. The government's policy of low volume high cost tourism has been successful, albeit controversial. The policy limits the number of visitors but in turn charges high prices for the privilege of intimacy.

Once were Hunters

Another controversial aspect of the Botswana Tourism industry has always been trophy hunting. Although kick-starting the tourism industry in Botswana in the 1960's and 1970's hunting has slowly been pushed aside in the last few years and this year the Botswana Government announced that hunting is to be stopped from 2014.

What the ban on hunting will ensure is that the vast areas that were set aside for hunting will now be retendered for and utilised for photographic tourism. This will add more land to an already amazing selection of wilderness areas.

INTO THE FUTURE

With a concerned government and firm planning the future of the Botswana Tourism industry is secure for now, and will continue to grow and provide visitors with the ultimate African sfari experience.

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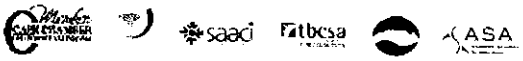

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Across Borders-KAZA TCFA

Often referred to as the most ambitious and complex conservation project in the world, negotiations surrounding the Kavango-Zambezi Transfrontier Conservation Area, are expected to be finalised this year and the five countries's ministers will meet again to sign a formal treaty that will legalise KAZA and its Secretariat. KAZA will further develop joint protocols and procedures in areas such as fire management, law enforcement, fisheries and research. Since 2008, KAZA-TCFA countries have been preparing their individual Integrated Development Plans (IDPs and this will be merged into a consolidated KAZA IDP, serving as the road map of the project. The Secretariat is now slated to move to Kasane.

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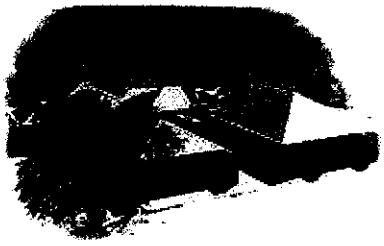

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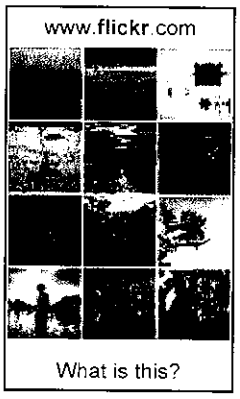

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ELEPHANT DATABASE

The most comprehensive data on elephant population and range worldwide.

Botswana, 2012 ("2013 AFRICA" analysis)

All Years for Botswana: **2013** — **2007** — **2002** — **1998** — **1995**

Botswana: Summary

Since the 2006 survey of Botswana's elephant range, two major elephant surveys were conducted: in 2010 and in 2012. Due to the very different results from these surveys, the Data Review Working Group has requested more information before it can validate and enter the latest survey result. At this time, the Data Review Working Group has decided that it is most prudent to retain the 2006 survey in the African Elephant Database.

2012 Summary Totals for Botswana

Data Category	Definite	Probable	Possible	Speculative
Aerial or Ground Total Counts	651	0	0	0
Direct Sample Counts and Reliable Dung Counts	132,437	21,183	21,183	0
Totals 2012	**133,088**	**21,183**	**21,183**	**0**
Totals 2007	**133,464**	**21,194**	**21,194**	**0**

Area of Range Covered by Each Data Category (km²)

Data Category	Known Range	Possible Range	Total Range
Aerial or Ground Total Counts	874	0	874
Direct Sample Counts and Reliable Dung Counts	65,259	24	65,282
Unassessed Range	22,930	11,166	34,096
Totals	**89,063**	**11,189**	**100,253**

Botswana: Elephant Estimates

	Cause of	Survey Details [2]			Number of Elephants				Area	Map Location	
Input Zone	Change [1]	Type	Reliab.	Year	Estimate	95% C.L.	Source	PFS [3]	(km²)	Lon.	Lat.
+ Tuli Game Reserve	DT	AT	A	2010	651		Selier & Page, 2010	2	1,320	29.1E	22.1S

* Range of informed guess

[1] Key to Causes of Change (only tracked since 2007): DA: Different Area; DD: Data Degraded; DT: Different Technique; NA: New Analysis; NG: New Guess; NP: New population; PL: Population Lost; RS: Repeat Survey (RS' denotes a repeat survey that is not statistically comparable for reasons such as different season); ——: No Change

[2] Key to Survey Types: AC: Aerial Count, not specified; AS: Aerial Sample Count; AT: Aerial Total Count; DC: Dung Count; EX: Extrapolation from GIS; GD: Genetic Dung Count; GS: Ground Sample Count; GT: Ground Total Count; IG: Informed Guess; IR: individual Registration; OG: Other Guess. Survey Type is followed by an indicator of survey quality, ranked from 1 to 3 (best to worst). Survey Reliability is keyed A-E (best to worst) as **outlined in this table**

[3] PFS: Priority for Future Surveys, ranked from 1 to 5 (highest to lowest). Based on the precision of estimates and the proportion of national range accounted for by the site in question. PFS is a measure of the importance and urgency for future population surveys. All areas of unassessed range have a priority of 1. See Introduction for details on how the PFS is derived.

Note that totals for the Definite, Probable, and Possible categories are derived by pooling the variances of individual estimates, as described at **http://www.elephantdatabase.org/reliability.** As a result, totals do not necessarily match the simple sum of the entries within a given category.

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Mozambique's elephants under threat

April 25 2013 at 12:24pm
By Jinty Jackson

Comment on this story

Maputo - Mozambique's elephant population risks being obliterated within a decade unless tight anti-poaching measures are introduced, conservationists have warned.

The alarming scale of the poaching problem has become increasingly apparent, with an aerial survey of the north of the country in 2011 tallying 2 667 elephant carcasses in the vast Niassa reserve alone.

Mozambique's pachyderms have seen little peace since the nation's brutal civil war ended 20 years ago.

"If we work out the numbers, in eight years probably we will have no elephants left," said Carlos Lopes Pereira, a technical adviser for the global Wildlife Conservation Society (WCS).

It is left to an anti-poaching force dependent on funding from overseas to protect the elephants and preserve a resource that could draw vital tourist dollars.

The few game rangers that exist are ill-equipped to do their job, using bolt-action rifles dating back to World War 2.

In contrast the poachers, thought to be part of vast syndicates based in the Horn of Africa, use high-calibre military weaponry and advanced hunting techniques.

"They are able to shoot many animals at the same time," said Pereira, explaining that poachers know how to approach a herd, shoot the matriarch first and then hone in on five or six other animals amid the chaos that follows.

Already wildlife authorities are seeing changes in the composition of herds as a result of poaching.

There are now more orphans and calves falling prey to lions, said Pereira.

That is part of a broader trend seen across Africa, with the UN Environment Programme and other wildlife groups reporting alarming declines in elephant numbers in parts of Central and West Africa.

Previously secure populations in eastern and southern parts of the continent are now coming under threat as demand for tusks, particularly in Asia, heats up.

The illicit trade in ivory is estimated to have doubled since 2007 and more than tripled over the past 15 years, according to the Convention on International Trade in Endangered Species (CITES).

A recent CITES report estimated that as many as 25 000 elephants were killed for their tusks across the continent in 2011.

In Mozambique, as elsewhere in Africa, the threat is seen as coming from across the border.

"Historically poachers come down from Somalia, through Kenya," said Francisco Pariela, the Mozambique government's conservation director.

But, he admitted, locals are easily recruited to the trade because the "money is tempting".

He also conceded that "state employees are involved, community members are involved".

So far the government, facing a plethora of other human-centred problems, has been slow to react.

Since poaching is listed as a misdemeanour under penal laws that date back to Portuguese colonial times, authorities are limited in the punishments they can mete out.

"We can only fine people, not jail them," explains Pariela. "We have caught many but often nothing happens to poachers. They pay a fine and go free."

Mozambique has been singled out for its poor record in wildlife protection.

In 2012 the World Wildlife Fund said the country was among those doing the least to control the illegal trade in animal parts, along with nations like Laos and Vietnam.

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"Government is not taking this poaching problem seriously. They are not capable enough of taking firm measures at both a legal or an administrative level," said Carlos Serra, programme director at the environmental lobby group Centro Terro Vivo.

The problem needs clamping down on at the highest levels, he added. "Some of the arms used are from the police. Everyone knows this."

Plans are afoot to toughen up Mozambique's laws, but conservationists worry it may be too little too late.

"The ivory trade is completely out of control. Ivory poaching is getting worse by the day," warned WCS adviser Pereira. - Sapa-AFP

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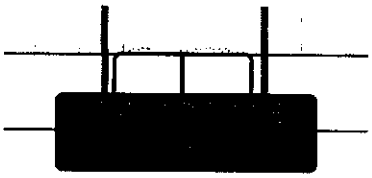

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WILDLIFE SURVEY PHASE 2 AND MANAGEMENT OF HUMAN-WILDLIFE CONFLICTS IN MOZAMBIQUE

Final Report

Part 4

Aerial Survey of Wildlife south of Lake Cabora Bassa

agreco

Aerial Survey of Elephants and other Large Herbivores south of Lake Cabora Bassa, Mozambique: 2010

Report prepared by
Kevin M. Dunham

December 2010

AGRECO G.E.I.E.
Avenue Louise 251,
Bte 23 - B-1050 Brussels,
Belgium

Summary

Elephants and other large herbivores, wild and domestic, in the region of Tete province, Mozambique, lying to the south of Lake Cabora Bassa were surveyed from the air during the dry season of 2010. Fixed-wing aircraft were used to conduct sample surveys, flying transects over the area. The study area totalled 16583 km^2. The area to the east of the Musengezi River (13963 km^2) was divided into 16 strata and surveyed during October-November 2010. Sampling intensity here averaged 25.2 %. The part of the study area to the west of the Musengezi River (2621 km^2) was divided into six strata and surveyed during August 2010 by staff of Zimbabwe's PWMA at a sampling intensity of 11.6 %.

The principal objective of the survey was to provide relatively precise and accurate estimates of the number of elephants and other large herbivores in the survey area as a whole, using a technique that could be executed within a reasonable time and at a reasonable cost. Secondary objectives included determination of the spatial distributions of elephants and other large herbivores; and estimation of the number and spatial distribution of elephant carcasses. The methods used were suitable for meeting the survey objectives, repeatable and technically robust.

Some large herbivores are not easily seen from the air and their numbers were undoubtedly underestimated. Nonetheless, population estimates are given for these species, because the estimates provide useful indices of abundance (with measures of precision) that can be used to determine spatial distribution, as well as temporal trends in population number. No corrections have been applied to any of the estimates to compensate for any undercounting or missed animals.

The estimated population numbers of the principal large herbivores in the entire survey area were: elephant 1985 (upper and lower 95% confidence limits ± 55.5 %); impala 3446 (± 46.2 %); buffalo 4626 (± 104 %); kudu 627 (± 37.8 %); hippopotamus 911 (± 48.6 %); warthog 528 (± 34.0 %); grey duiker 3149 (± 17.4 %); cattle 22988 (± 18.7 %); sheep and goats 16924 (± 20.9 %); and donkey 793 (± 35.5 %).

For most wild species, the majority of the population was to the west of the Musengezi River, even though this area formed just 16 % of the entire study area. Sable antelope, roan antelope and waterbuck were seen only to the west of the Musengezi River. The densities of other wild herbivores to the west of this River were often an order of magnitude greater than the densities of the same species to the east of the river. The densities of domestic livestock were lower in the west than in the east. The estimated population numbers of the principal large herbivores to the west of the Musengezi River were: elephant 1465 (± 73.6 %); impala 3429 (± 46.4 %); buffalo 4483 (± 107.4 %); kudu 266 (± 70.9 %); zebra 59 (± 209 %); hippopotamus 282 (± 122 %); warthog 432 (± 39.7 %); sable 341 (± 171 %); roan 30 (± 150 %); waterbuck 50 (± 225 %); cattle 1973 (± 171 %); and sheep and goats 3913 (± 73.1 %).

The estimated total number of elephant carcasses (291) in the entire survey area represented 12.8 % of the estimated total number of live and dead elephants. This all-carcass 'ratio' reflects the mortality rate of elephants during the several years preceding the survey. The ratio was similar to the west and the east of the Musengezi River. No fresh or recent carcasses of elephants were seen during the survey and so the 1+2 carcass ratio was 0 %. If local people commonly dismember dead elephants, and remove and, in effect, scatter their body parts, no carcass is left to be seen by a survey team. In these circumstances, the number of elephant carcasses seen during a survey may underestimate elephant mortality.

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Introduction

There is a high incidence of human-wildlife conflict in Mozambique (Dunham *et al.* 2010) and the national government has commissioned studies of the wildlife and these conflicts to address this problem (AGRECO 2008). The second phase of these studies included preparation of a land use plan intended to mitigate human-wildlife conflicts in the three administrative districts (Magoe, Cahora Bassa and Changara) that lie to the south of Lake Cabora Bassa in western Tete Province. The purpose of this survey was to provide current information on the numbers and spatial distribution of large mammals, to inform the preparation of this land use plan.

The methods used during this survey were similar to those used during previous surveys of the wildlife populations of western Magoe district, which forms the Magoe survey area (Mackie 2001, Dunham 2004). The principal objective of the survey was to provide relatively precise and accurate estimates of the number of elephants and other large herbivores in the survey area as a whole, using a technique that could be executed within a reasonable time and at a reasonable cost. Secondary objectives included determination of the spatial distributions of elephants and other large herbivores; and estimation of the number and spatial distribution of elephant carcasses. The methods used were suitable for meeting the survey objectives, repeatable and technically robust.

Study Area

The study area was bounded to the north by the southern shore of Lake Cabora Bassa, and to the west and south by the Mozambique-Zimbabwe international border (Map 1). The eastern boundary lay westwards of the power lines running south from Cabora Bassa dam to South Africa. This eastern boundary was chosen to eliminate areas of Changara district where there were relatively high densities of people and domestic livestock and thus few large, wild animals (M. Foloma, pers. comm.).

The entire study area is communal land, where people live, keep domestic livestock and grow crops. Fishing is an important activity in and along the shore of Lake Cabora Bassa. The study area is included in wildlife concessions where relatively small numbers of large animals are killed annually by sport hunters.

The study area is divided into western and eastern portions by the Musengezi River, which flows into Lake Cabora Bassa and prevents travel on land within Mozambique between the two regions. Travellers on land by go via Zimbabwe in order to go from one region to the other.

West of the Musengezi River is a generally triangular shaped piece of land, with two sides formed by the Zimbabwe-Mozambique international border. Much of the western boundary is shared with Zimbabwe's Dande Safari Area and it is likely that there is extensive movement across all sections of the international border, which is unfenced. Certainly the elephants in the western part of the study area are regarded as part of a much larger population that ranges westwards to Kariba and northwards, across the Zambezi River, into Zambia (Dunham 2004). During August 2010, the wildlife in the western Magoe region was surveyed from the air by the staff of Zimbabwe's Park & Wildlife Management Authority, in association with National Directorate of Land and Forests (DNTF) staff from Maputo and with financial support from the Monitoring Illegal Killing of Elephants (MIKE) project, during August 2010.

Eastwards of the Musengezi River, the study area shares a long border with Zimbabwe and the extent of animal movements across this border are largely unknown. But there are not thought to be significant population of wild large mammals on the Zimbabwe side of the border, although a small number of elephants frequent the valley of the Mazoe River (Dunham & Mackie 2002).

In this report, the **study area** refers the area that is bounded by the southern shore of Lake Cabora Bassa, the international border with Zimbabwe, and the line that forms the eastern boundary of the survey area (Map 1). The **survey area** refers to that part of the study area that lies east of the Musengezi River and where the wildlife was surveyed during a survey undertaken by AGRECO during October and November 2010. In this report, the results from the wildlife survey in AGRECO's **survey area** are combined with the results from PWMA's **Magoe area** to give combined estimates for the **study area**.

Methods

Survey Design

The wildlife in the area to the west of the Musengezi River - the Magoe survey area of Mackie (2001) and Dunham (2004) - was surveyed by staff of the Parks & Wildlife Management Authority, Zimbabwe, during August 2010. The methods used were essentially the same as those used to survey the remainder of the study area (that area to the east of the Musengezi River). Hence the Magoe area was not surveyed for a second time, but instead the results of the August 2010 survey are included in the analysis presented here.

The procedures used followed those well established for aerial surveys of African large herbivores (Norton-Griffiths 1978) and utilised during earlier surveys of large herbivores in Mozambique (e.g. Mackie 2001, Craig 2006).

The area to the east of the Musengezi River was divided into 16 strata. Systematic, parallel transects were positioned across each stratum, with the position of the first transect in a stratum determined randomly. Transects were arranged at right angles to the principal environmental feature – usually the Cabora Bassa shoreline or a major river - within a stratum (see Map 4 and Table 4 for transect orientations). Sampling intensity was planned to be 20 %, with a transect width (i.e. combined width of the two search strips) of 400 m.

Transect surveys cannot be undertaken safely in very hilly areas and so a hilly area along the international border to the west of Changara town was excluded from the survey area (Map 2). A small area (266 km^2) of hills near the centre of the survey area was also not surveyed.

The survey was designed using WWF-SARPO's custom software (AIRDESW, version dated 29/05/97). Given a stratum boundary in the form of an ATLAS GIS bna format file, and the transect orientation and spacing, this software generates flight lines (the transects), with the first flight line offset from the end of the stratum by an entered random number. The start and end points for each transect (Appendix 3) were transferred as waypoints to a Global Positioning System (GPS) receiver in the plane prior to flying each stratum.

Flight Procedures

Strata to the east of the Musengezi River were surveyed during the period 19 October to 3 November 2010 (Table 4). This was at the end of the dry season, before any rain had fallen. An advantage of conducting the survey so late during the dry season was that visibility for the observers was high, because most trees and bushes were leafless and often the grass layer had been burnt.

The aircraft used for the survey were a Cessna 206 (October 19 to 27) and a Cessna 185 (October 30 to November 3). Both were fitted with a radar altimeter and a Garmin GPSmap 296 GPS receiver. During the survey, the aircraft were flown at approximately 180 km per hour at about 300 feet above ground level. Waypoints denoting the start and end points of transects were entered into the GPS receiver and used to form routes. Navigation along the transects was undertaken by the pilot, with reference to the GPS receiver. The track of the aircraft was recorded using the track log facility of the GPS receiver, which noted the aircraft's location at intervals of 20 seconds (of time).

The aircraft crew included a pilot (Bryan Eygabroad in the Cessna 206 and Simon Rodger in the Cessna 185), a recorder (the author) who sat next to the pilot, and two observers who sat behind the pilot and recorder. The two observers were Greg Nyaguse and David Chipesi, who both had previous experience of observing during aerial surveys.

All animals seen by the observers within the search strips (see section *Strip Width and Calibration* below) were called to the recorder, who wrote down the species, the number of individuals of the group that were within the strip, and the GPS location against the time (to the nearest 30 seconds) after the start of the transect. Locations were recorded as waypoints using a Garmin GPSmap 276 receiver. During the survey, the actual height of the plane above ground level (agl) was recorded by the recorder, from the radar altimeter, every 30 seconds (of time) while flying along the transects. Later the mean height above ground level for each transect was calculated. The recorder used a stopwatch to record the time (to the nearest second) taken to fly each transect.

Observations

The observers were instructed to search for elephants but to count also other wild large herbivores and domestic livestock (cattle, goats, sheep, donkeys and pigs). Sheep and goats are not readily distinguished during aerial surveys and so both were recorded as 'shoats', but it is likely that most of those in the study area were goats. If any animal group was too large for all the individuals within it to be counted, group size was estimated by the observer. Groups of elephant bulls were differentiated from elephant cow herds (i.e. herds containing calves), although the latter may have included some bulls. The observers were instructed to note any carcasses seen. All elephant carcasses noted were classified using four age categories as follows:

Carcass category	Definition
1	**Fresh** Carcass still had flesh, giving the body a rounded appearance. Vultures were probably present and the ground was still moist from body fluids. (Likely to have died within the past month).
2	**Recent** Rot patch and skin still present. Skeleton not scattered. (Likely to have died within the past year).
3	**Old** Clean bones; skin usually absent; vegetation regrown in rot patch. (Likely to have died more than 1 year ago).
4	**Very Old** Bones scattered and turning grey. (Likely to have died within the last 10 years).

These carcass categories are those used by Douglas-Hamilton & Hillman (1981) and now recommended by MIKE for elephant surveys (Craig undated). MIKE (Monitoring the Illegal Killing of Elephants) is a CITES programme that uses aerial and ground surveys of elephant populations, and data collected by law-enforcement patrols, to monitor the illegal killing of elephants at representative sites across Africa and Asia.

Elephant tracks were also noted, as it is likely that elephants range more widely within the study area than the sightings of live elephants might suggest. Recent tracks of elephants could often be seen in sandy riverbeds and older tracks could sometimes be seen in areas with clayey top soils.

Ground hornbills are large and conspicuous birds and any seen were counted, as were poachers' camps. Poachers' camps were identified by the presence of woody racks used to dry meat over a fire. A settlement was defined as one or several huts probably occupied by a single family. A village was defined as a larger collection of huts probably occupied by several or many families. Commercial logging was recorded when signs of a felled tree were

observed. Places with surface water, i.e. potential sources of drinking water for wildlife, were also noted.

Strip Width and Calibration

Two fishing rods were attached with custom brackets to each wing strut of the aircraft, so that the rods pointed backwards and parallel to the ground during level flight. The distance between the rods on each strut was arranged so that, when the aircraft was flying at 300 feet agl, this distance represented a strip about 200 m wide on the ground. Each outer rod was marked with a small piece of tape to provide the observers with a "decision point" (it was at this point that the observer decided whether an animal was inside his search strip). When deciding whether animals were inside or outside the strip, the observer moved his eye so as to align the tape on the outer rod with a small piece of tape on his window, thereby ensuring that all his decisions were made at the same viewing angle.

Prior to and during the survey, the strip widths were calibrated by flying the aircraft at right angles across an airstrip that had two sets of large-sized numbers (from 0 to 40) arranged at 10-meter intervals along the side of the airstrip. The numbers were arranged as 40 39 38....2 1 0 1 2.....38 39 40, with 0 near the centre of the airstrip. Each observer noted the largest and smallest number within his strip and the recorder noted the aircraft's height above ground level, as recorded by the radar altimeter. For each flight passing over the calibration numbers, the combined strip width (in meters) was adjusted to 300 feet above ground level as follows:

$$\text{Combined strip width at 300 feet} = \frac{\text{Actual combined strip width} \times 300}{\text{Actual flying height}}$$

The combined strip widths, after adjustment to 300 feet above ground level, were then averaged to give the nominal (calibrated) combined strip width at 300 feet. This was 457.2 m for surveys flown with the Cessna 206 during October 19 – 27 and 453.1 m for surveys flown with the Cessna 185 during October 30 to November 3 (Appendix 1).

Data Analysis

Population estimates and 95 % confidence limits for individual strata were calculated with WWF-SARPO's custom software (AIRSURVW, version dated 22/05/97). This software uses Jolly's (1969) method 2 for unequal-sized sample units. Given the mean combined strip width when the plane was flying at 300 feet (i.e. the calibrated strip width), and the mean flying height for each transect, the software determines the actual combined strip width for each transect. The actual combined strip width is the product of the nominal strip width at 300 ft and the mean height for the transect, divided by 300. The area of each transect is calculated as the product of the actual combined strip width and the transect length. Transect lengths were provided by the survey design software (Appendix 3).

Transects near the boundary of a stratum were sometimes broken into two or more sections, with land outside the stratum between the sections. For the purposes of analysis, data for all sections of the same transect were combined and entered into the software as one transect. Calculation of the variance of a population estimate required the calculation of N, an integer that is the total number of transects that could have been used in the survey of a stratum. The value of N for a stratum was found by dividing the baseline length by the overall mean actual strip width for that stratum.

Thus, for each stratum, N was calculated as:

$$N = \frac{\text{Baseline length x 1000 x 300}}{\text{Nominal strip width x Average flying height}}$$

where:

Baseline length = length (in km) of a straight line aligned at right angles to the orientation of the transects, and running from one end of the stratum to the far end;

Nominal strip width = calibrated combined strip width (in m) when flying at 300 feet agl; and

Average flying height = Mean of the mean flying heights (in feet) for all transects in the stratum.

The calculated value of N was rounded to the nearest integer. The value of Student's *t* used to calculate the 95 % confidence limits of a population estimate was t_{n-1} for $P = 0.05$ (Rohlf & Sokal 1981), where n = number of surveyed transects in stratum. The WWF-SARPO software AIRSURVW calculates the 95 % confidence *interval* as the difference between the mean population estimate and the upper (or lower) 95 % confidence *limit*. The software displays the lower 95 % confidence limit as zero if the calculated value is negative.

Entire study area

Population estimates for the entire study area (and for the regions to the west and the east of the Musengezi River) were calculated as the sum of the estimates for the individual strata within the study area, or region. The upper and lower 95% confidence limits for population estimates for the entire study area or region were calculated as:

Population estimate ± [t_v x Square root of (Sum of Variances for individual strata)]

where:

v = the degrees of freedom estimated by Satterthwaite's rule (Snedecor & Cochran 1980, Gasaway *et al.* 1986).

v was an integer, calculated using the formula:

$$v = \frac{(\text{Sum of Variances for individual strata})^2}{\text{Sum of } [(\text{Variance for individual stratum})^2 / (n-1)]}$$

with the outcome of this formula rounded down to the nearest integer. t_v was calculated using the EXCEL function TINV(0.05, v).

Elephant carcasses

The elephant carcass "ratio" *sensu* Douglas-Hamilton & Burrill (1991) - although it is a percentage, not a ratio - was calculated as the estimated number of all elephant carcasses (i.e. age categories 1, 2, 3 and 4 summed) as a percentage of the estimated number of all elephants (i.e. live + dead).

When interpreting the results of this survey, it is reasonable to assume that all category 1 or 2 carcasses represent elephants that died during 2010. Hence, the 1+2 carcass ratio provides an index of elephant mortality (both natural and anthropogenic) during 2010 and it was calculated as the estimated number of elephant carcasses in age categories 1 or 2 as a percentage of the sum of the estimated number of live elephants and the estimated number of carcasses in age categories 1 or 2.

Search Effort

The greater the time spent searching each square kilometre of a transect, the greater the probability that the observer saw all the animals that were there. Search effort (in minutes per square kilometre) for a stratum was defined as the total time spent flying all transects within that stratum, divided by the total area of those same transects.

Even the largest herbivores are not easily seen from the air and the numbers of all species were probably underestimated, with the degree of underestimation greater for small or cryptic species than for large species. However, population estimates are given for all species, because the estimates provide useful indices of abundance (with measures of precision) that can be used to determine spatial distribution, as well as temporal trends in population number. No corrections have been applied to any of the estimates to compensate for any undercounting or missed animals.

Results

Search Effort

Search effort averaged 0.60 minutes km^{-2} for the survey area (Table 4).

Animal Numbers

The estimated numbers of elephants, elephant bulls in bull groups, elephants in cow herds, elephant carcasses (age categories 3 and 4), buffalo, impala, hippopotamus, warthog, kudu, zebra, waterbuck, sable, roan, common duiker, cattle, sheep and goats, donkey, domestic pig, ground hornbill and crocodile are given in Tables 5 to 25 respectively. Estimates are given for each stratum, for the regions west and east of the Musengezi River, and for the entire study area.

In addition, separate summary tables are provided for the Magoe area to the west of the Musengezi River, the survey area to the east of that river, and for the entire study area (Tables 1 - 3).

The columns in these tables give (from left to right):

- the name of the **stratum**;
- the **estimate** of the number of animals of that species (or of carcasses) in that stratum, in other words the population estimate;
- the number of individuals of that species seen (**No. seen**) *inside the search strips* during the survey of that stratum;
- the **variance** of the estimated number of animals in that stratum;
- the 95 % confidence interval of the population estimate for that species in the stratum, as a percentage of the population estimate for that stratum (**% CI**);
- the lower 95 % confidence limit of the population estimate (**Lower CL**); and
- the upper 95 % confidence limit of the population estimate (**Upper CL**).

The last row of each table gives the same measures for the entire study area. There may appear to be small arithmetic errors in some tables, but these are simply rounding errors: all numbers in the tables were calculated to three decimal places before they were rounded to the required number of decimal places. If the number of individuals seen (**No. seen**) is greater than the lower confidence limit (**Lower CL**), then it is biologically meaningful to replace the calculated lower confidence limit with the number seen.

For practical purposes, it can be assumed that the number of a given species in the survey area lies between the lower and upper confidence limits, with the 'estimate' providing the best estimate of the number there. For example, from Table 5, one can say that there were

between 882 and 3087 elephants in the survey area, with 1985 being the best estimate of the number of elephants in the area. For practical purposes, one might say that there were between 900 and 3100 elephants in the survey area during the dry season of 2010, with 2000 being the best estimate of the number of elephants there.

Small numbers of bushbuck, bushpig, baboon, grysbok and monkey were seen during the survey, but no attempt has been made to estimate the numbers of these species. No eland were seen during the survey.

Elephant Carcasses

No fresh or recent carcasses of elephants (i.e. age categories 1 or 2) were recorded during the survey and hence the 1+2 carcass ratio was 0.

The estimated total number of elephant carcasses (291) in the entire study area during 2010 represented 12.8 % of the estimated total number of live and dead elephants. This all-carcass 'ratio' reflects the mortality rate of elephants during the several years preceding the survey. The ratio was similar to the west and the east of the Musengezi River (13.2 % to the west and 11.7 % to the east), although the carcasses in the east were generally older than those in the west (Map 9).

Table 1. Population estimates and statistics for major wildlife species, domestic livestock and elephant carcasses west of the Musengezi River, Mozambique, during August 2010

Species	Estimate	No. Seen	Variance	% CI	Lower CL	Upper CL	Density (km^{-2})
Elephant	1465	189	278077	73.6	387	2544	0.56
Elephant bull	156	21	3557	81.7	28	283	0.06
Elephant cow	1310	168	274520	81.9	237	2383	0.50
Buffalo	4483	587	5042431	107.4	0	9299	1.71
Zebra	59	8	3210	208.7	0	183	0.02
Impala	3429	461	591864	46.4	1837	5020	1.31
Hippopotamus	282	33	26927	122.4	0	626	0.11
Warthog	432	54	7151	39.7	260	603	0.16
Kudu	266	33	8561	70.9	77	455	0.10
Waterbuck	50	4	1650	225.3	0	163	0.02
Sable	341	45	71853	171.1	0	925	0.13
Roan	30	4	434	149.6	0	76	0.012
Duiker grey	634	56	47874	84.4	99	1169	0.24
Cattle	1973	143	1912156	171.5	0	5356	0.75
Sheep/goat	3913	381	1781027	73.1	1051	6776	1.49
Donkey	0	0	0	0.0	0	0	0.00
Pig domestic	0	0	0	0.0	0	0	0.00
Elephant carcass 3	199	25	924	30.9	138	261	0.08
Elephant carcass 4	23	3	211	139.2	0	54	0.009
Ground hornbill	154	18	4437	93.2	11	298	0.06
Crocodile	616	69	57531	95.3	29	1203	0.24

Table 2. Population estimates and statistics for major wildlife species, domestic livestock and elephant carcasses east of the Musengezi River, Mozambique, during October-November 2010

Species	Estimate	No. Seen	Variance	% CI	Lower CL	Upper CL	Density (km^{-2})
Elephant	519	134	14821	46.7	277	762	0.04
Elephant bull	57	15	389	70.3	17	97	0.004
Elephant cow	463	119	14432	51.7	223	702	0.03
Buffalo	143	41	14709	176.7	0	396	0.01
Zebra	51	12	1874	175.6	0	140	0.004
Impala	17	4	127	136.9	0	40	0.001
Hippopotamus	629	155	21659	46.9	334	924	0.05
Warthog	96	25	796	58.5	40	153	0.007
Kudu	361	90	5562	41.2	212	509	0.03
Waterbuck	0	0	0	0.0	0	0	0.00
Sable	0	0	0	0.0	0	0	0.00
Roan	0	0	0	0.0	0	0	0.00
Duiker grey	2515	627	14388	9.4	2278	2752	0.18
Cattle	21016	5223	2502881	14.9	17882	24149	1.51
Sheep/goat	13010	3279	1284109	17.2	10772	15249	0.93
Donkey	793	197	19737	35.5	512	1074	0.06
Pig domestic	172	42	2347	57.6	73	271	0.012
Elephant carcass 3	17	4	52	86.3	2	31	0.001
Elephant carcass 4	52	13	148	46.3	28	76	0.004
Ground hornbill	165	41	1489	46.2	89	241	0.01
Crocodile	130	31	1987	70.3	39	222	0.009

Table 3. Population estimates and statistics for major wildlife species, domestic livestock and elephant carcasses in the area of Mozambique south of Lake Cabora Bassa during the dry season of 2010

Species	Estimate	No. Seen	Variance	% CI	Lower CL	Upper CL	Density (km^{-2})
Elephant	1985	323	292899	55.5	882	3087	0.12
Elephant bull	212	36	3946	62.2	80	344	0.01
Elephant cow	1773	287	288952	61.8	676	2869	0.11
Buffalo	4626	628	5057140	104.3	0	9449	0.28
Zebra	110	20	5085	133.4	0	256	0.007
Impala	3446	465	591991	46.2	1854	5037	0.21
Hippopotamus	911	188	48586	48.6	468	1354	0.05
Warthog	528	79	7947	34.0	348	707	0.03
Kudu	627	123	14123	37.8	390	864	0.04
Waterbuck	50	4	1650	225.3	0	163	0.003
Sable	341	45	71853	171.1	0	925	0.02
Roan	30	4	434	149.6	0	76	0.002
Duiker grey	3149	683	62262	17.4	2600	3698	0.19
Cattle	22988	5366	4415036	18.7	18691	27286	1.39
Sheep/goat	16924	3660	3065136	20.9	13383	20465	1.02
Donkey	793	197	19737	35.5	512	1074	0.05
Pig domestic	172	42	2347	57.6	73	271	0.010
Elephant carcass 3	216	29	976	29.2	153	279	0.013
Elephant carcass 4	75	16	359	51.7	36	113	0.004
Ground hornbill	320	59	5926	49.7	161	478	0.02
Crocodile	746	100	59517	80.0	149	1343	0.05

Animal Distributions

The spatial distribution of the principal wild herbivores is shown in Maps 7 to 16. On these maps, the locations of sightings of groups of the given species are shown, together with an indication of the size of the group. However, it must be remembered that the recorded number of groups of any species was determined by both group density and the sampling intensity – which varied between west and east of the Musengezi River (Table 4).

The spatial distribution of elephant carcasses of age categories 3 and 4 is shown in Map 9.

Human Activities

The spatial distributions of human settlement is shown in Map 5, of commercial logging in Map 6 and of domestic livestock in Maps 17 and 18. The estimated number of poachers' camps in the study area was 57 (confidence interval 67 %) and more than 50 % of these camps were in the Mukumbura 1 stratum.

Discussion

Wildlife

The area west of the Musengezi River formed just 16 % of the study area, but contained the majority of the wildlife. The only sable antelope, roan antelope and waterbuck seen were west of the Musengezi. For most other wild species, their density west of the Musengezi was an order of magnitude greater than their density east of the Musengezi (Tables 1 and 2). Only for four species - elephant, hippopotamus, kudu and duiker - did the population estimate for the area east of the Musengezi River exceed 200 individuals.

Elephant Carcasses

Elephant carcasses provide an index of elephant mortality only if dead elephants (or at least their skeletons) are left in the field to decay. If, as may happen in communal lands that are occupied by people, dead elephants are dismembered and the body parts removed and in effect scattered over a wide area, no carcass is left to be observed by a survey team. In these circumstances, the number of elephant carcasses seen during an aerial survey of the wildlife may underestimate elephant mortality.

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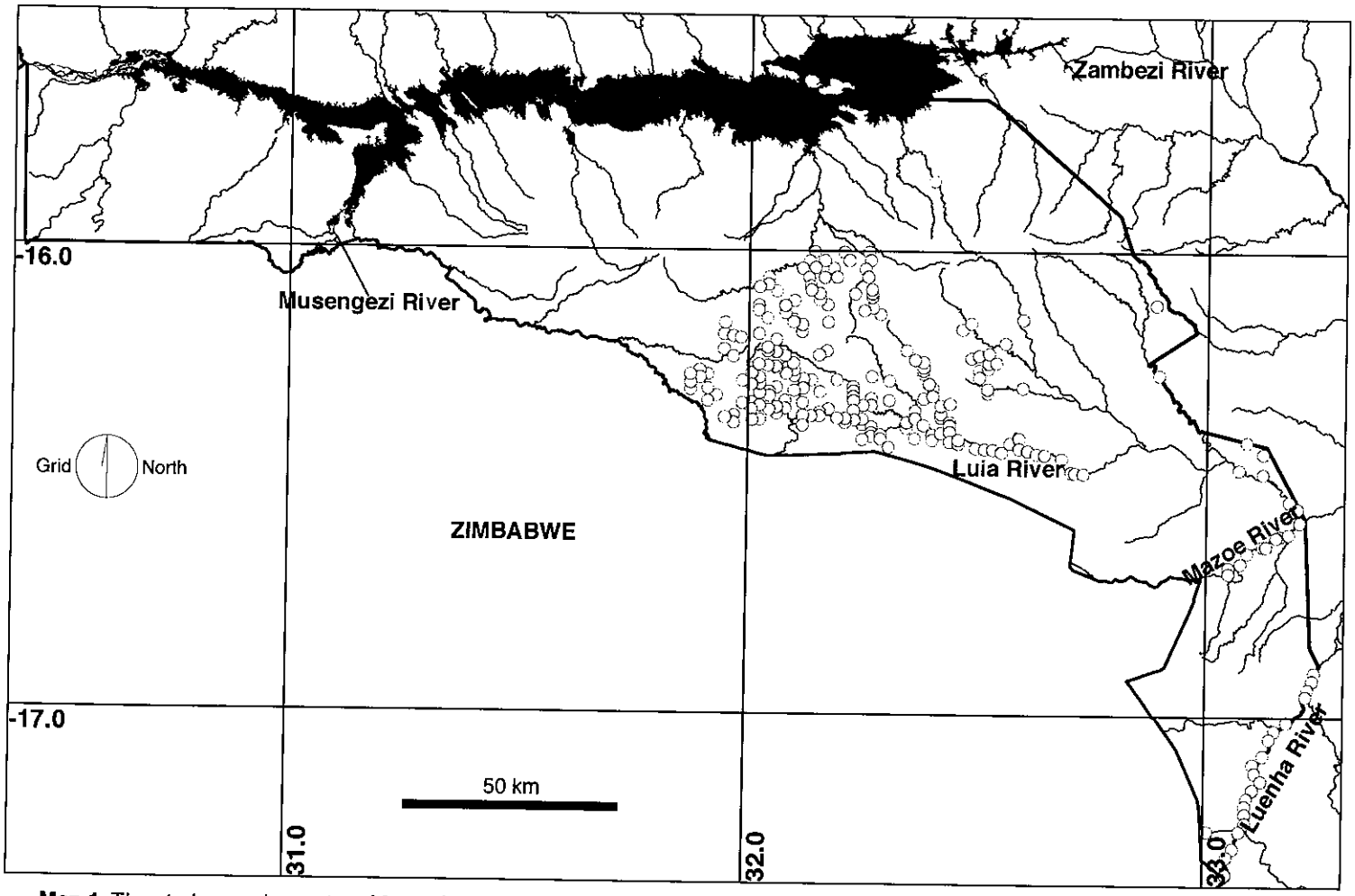
Table 4. Sampling statistics for the 2010 aerial surveys of large herbivores south of Cabora Bassa, Mozambique

Stratum name	Stratum area (km^2)	Transect spacing (km)	Transect orientation (°)	Number of transects [= n]	Percent of stratum sampled	Time and date sampled	Flying time (hours) [a]			Search effort (minutes km^{-2})
							Transect	Stratum	Total	
West of Musengezi River										
Magoe 1	348	2.0	0	13	13.5	am 25 Aug	0.86	1.10	-	1.10
Magoe 2	343	2.0	0	15	13.6	pm 25 Aug am 27 Aug	0.91	1.22	-	1.17
Magoe 3	135	5.0	0	5	8.0	am 27 Aug	0.23	0.27	-	1.26
Magoe 4	656	2.6	90	10	10.9	am pm 28 Aug	1.35	1.42	-	1.13
Magoe 5	747	2.1	90	13	13.2	am 27 Aug am 28 Aug	1.92	2.13	-	1.17
Magoe 6	392	5.0	90	7	7.2	am 27 Aug	0.56	0.78	-	1.19
Subtotal / mean	**2621**				**11.6** [b]		**5.83**	**6.92**	**9.48**	**1.17**
East of Musengezi River										
Mukumbura 1	1222	2.0	0	27	23.7	am 19 Oct am 20 Oct	3.26	3.90	6.08	0.68
Mukumbura 2	821	2.0	0	29	23.8	am 21 Oct	2.17	2.75	4.25	0.67
Mphende	741	2.0	0	21	25.7	am 20 Oct am 22 Oct	1.90	2.30	3.78	0.60
Mukumbura 3	793	2.0	0	21	26.0	am 22 Oct	1.97	2.50	2.88	0.57
Mukumbura 4	742	2.0	0	19	24.5	am 23 Oct	1.76	2.23	3.38	0.58
Chintholo 2	877	2.0	0	26	25.1	am 25 Oct	2.11	2.60	3.63	0.58
Chitima 1	549	2.0	0	20	26.6	am 27 Oct	1.33	1.78	2.50	0.54
Chitima 3	515	2.0	90	11	24.5	pm 25 Oct	1.19	1.42	2.23	0.57

Stratum name	Stratum area (km^2)	Transect spacing (km)	Transect orientation (°)	Number of transects [= n]	Percent of stratum sampled	Time and date sampled	Flying time (hours) [a]			Search effort (minutes km^{-2})
							Transect	Stratum	Total	
Chitima 4	555	2.0	90	11	24.4	pm 26 Oct	1.26	1.52	2.18	0.56
Chintholo 1	706	2.0	0	21	28.6	am 2 Nov am 3 Nov	1.81	2.35	4.22	0.54
Chitima 2	1196	2.0	90	26	23.9	pm 20 Oct pm 21 Oct pm 23 Oct	3.01	3.62	4.85	0.63
Kachembe	695	2.0	90	19	23.6	pm 19 Oct pm 23 Oct	1.74	2.18	3.10	0.63
Chintholo 3	1253	2.0	0	28	24.9	am pm 30 Oct pm 31 Oct pm 1 Nov	3.12	4.05	7.07	0.60
Chintholo 4	944	2.0	0	23	26.0	am 26 Oct	2.23	2.65	3.60	0.54
Chipembere	1415	2.0	0	27	26.7	am 31 Oct am1 Nov	3.98	4.75	6.78	0.63
Luenha	938	2.0	90	43	25.4	am 2 Nov am 3 Nov	2.69	4.02	7.35	0.68
Subtotal / mean	**13962**				**25.2** [b]		**35.54**	**44.62**	**67.90**	**0.60**
TOTAL	**16583**									

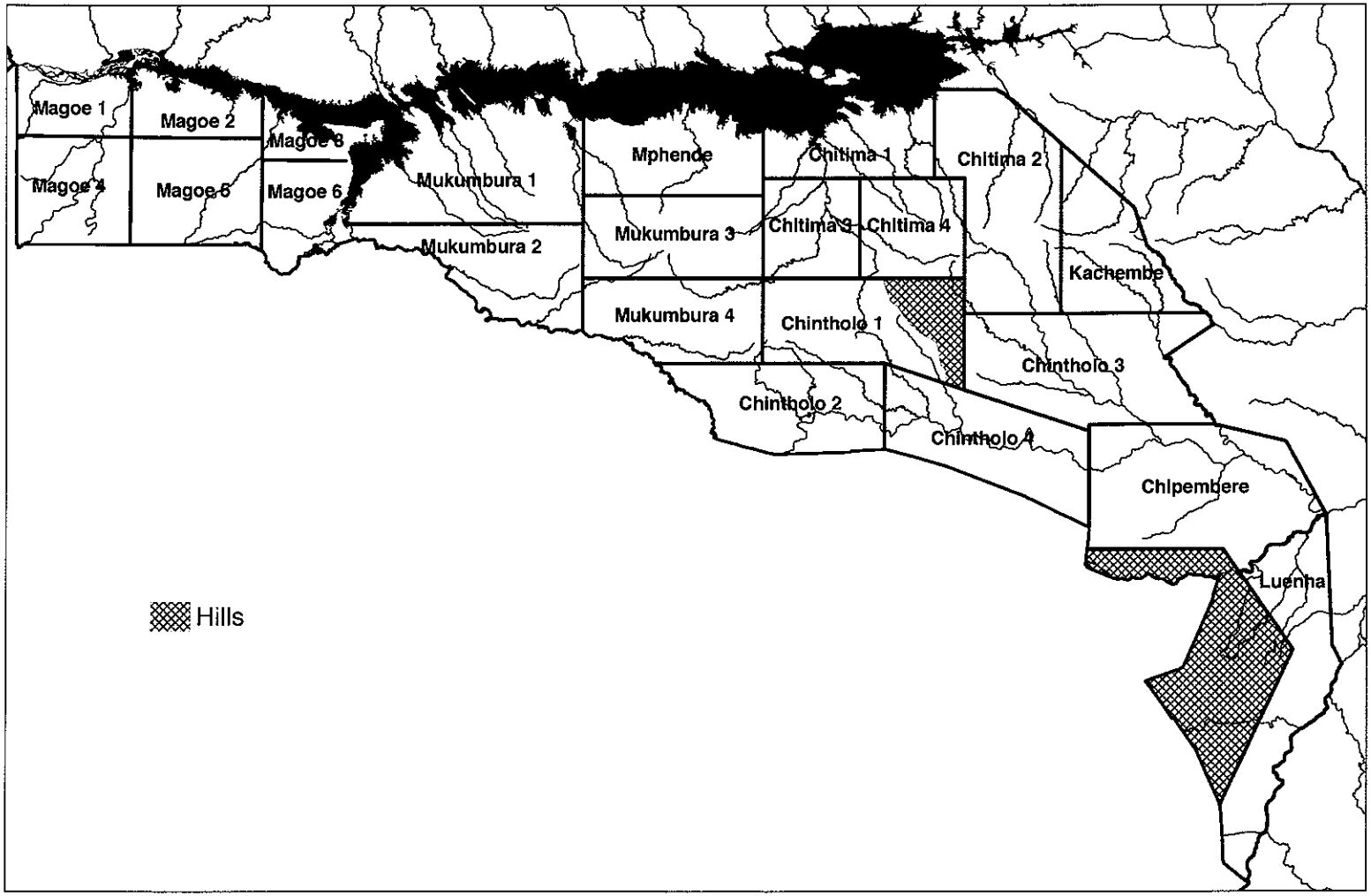
[a] Transect time is the time spent searching the transects; stratum time is the transect time, plus the time spent travelling between transects in the same stratum; and total time is the stratum time, plus the time spent travelling between the stratum and the airstrip

[b] Weighted mean, with stratum area as a proportion of the total area as weight



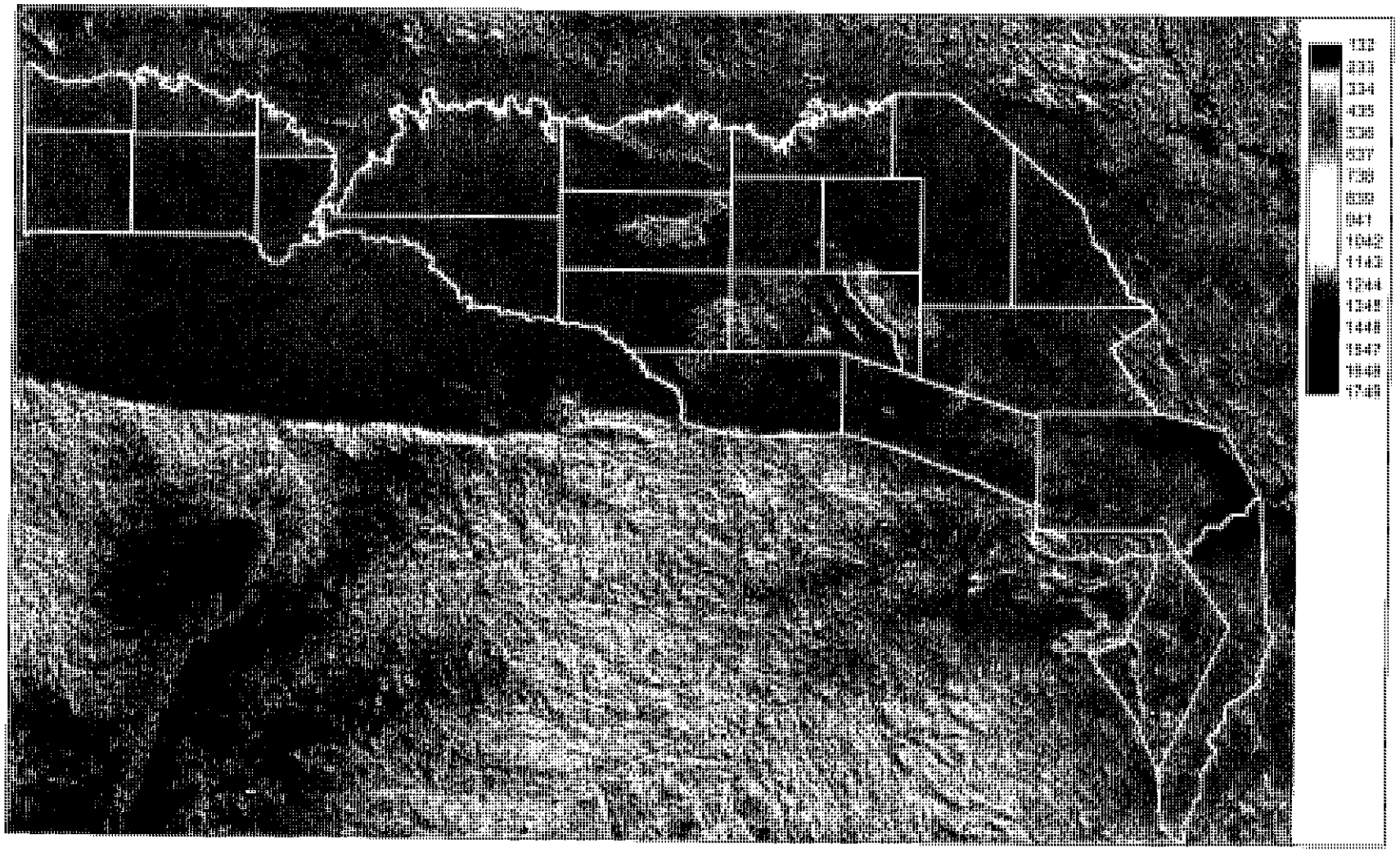
Map 1. The study area in western Mozambique lies between the international border and the southern shore of Lake Cabora Bassa

Red line indicates the Mozambique-Zimbabwe international border, and the heavy black line the eastern boundary of the study area. The major rivers are named, but aboveground flow of water in most other rivers is only seasonal. Blue dots indicate where surface water was seen away from Cabora Bassa during the survey. The survey team were not instructed to record water points during the survey of the area to the west of the Musengezi River.



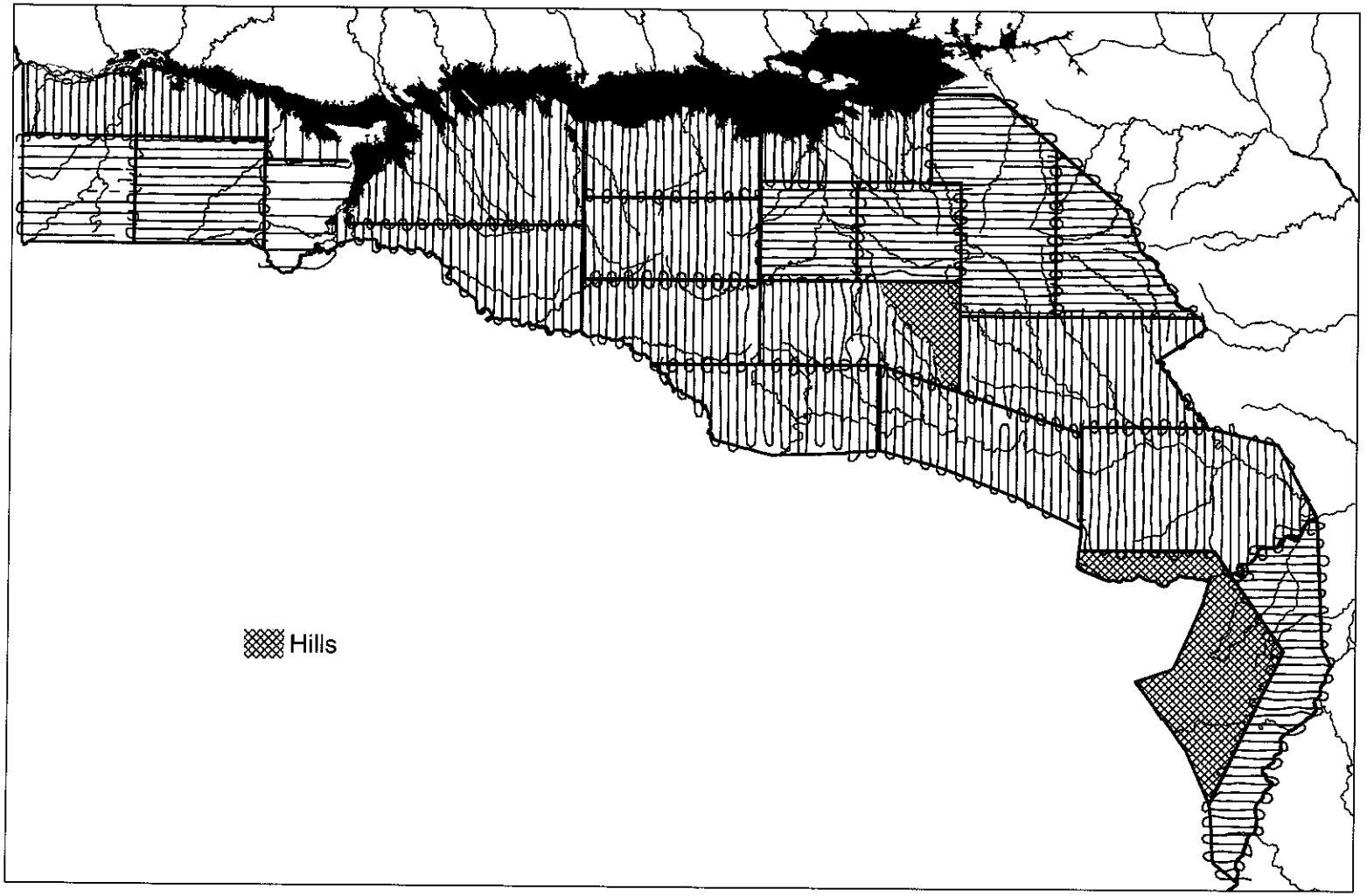
Map 2. Strata used during the 2010 aerial surveys of the southern Cabora Bassa region

Bold lines indicate strata boundaries and labels give strata names. Red line indicates the Mozambique-Zimbabwe international border.



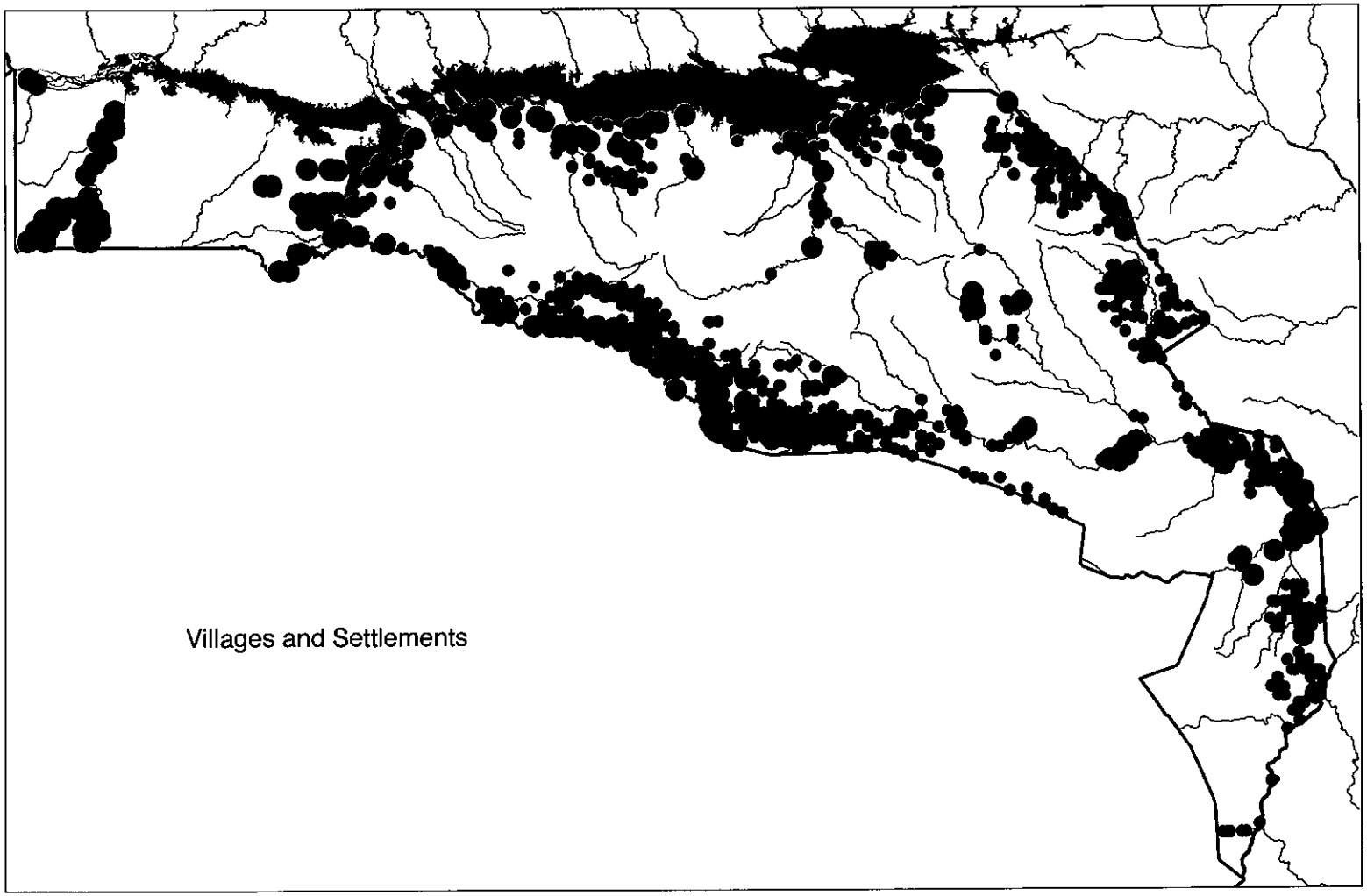
Map 3. Digital elevation model of the study area and its surrounds

Altitude is in meters. Bold white lines indicate strata boundaries.



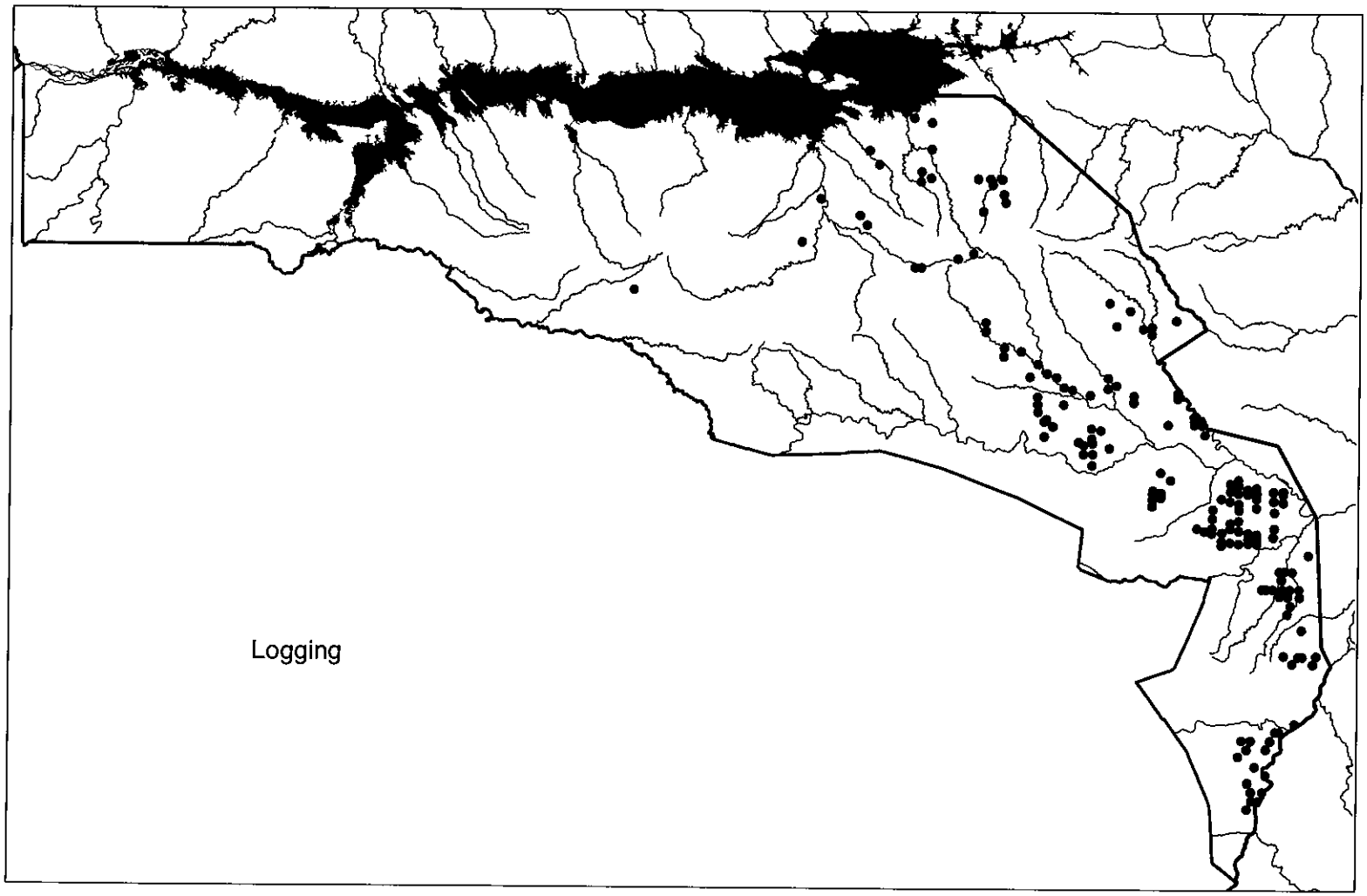
Map 4. Tracklogs (flight lines) indicating the transects used during the 2010 aerial surveys of the southern Cabora Bassa region

Bold lines indicate strata boundaries, thin parallel lines the flight lines along the transects, the red line the international border, and blue lines the river systems.



Map 5. Distribution of villages and human settlements south of Lake Cabora Bassa during the 2010 dry season

Large circles indicate villages, small circles indicate settlements. Only villages were recorded to the west of the Musengezi River.



Map 6. Distribution of tree felling for commercial purposes south of Lake Cabora Bassa during the 2010 dry season

The survey team were not instructed to record logging during the survey of the area to the west of the Musengezi River.

Table 5. Population estimates and statistics for Elephant south of Lake Cabora Bassa

Stratum	Estimate	No. Seen	Variance	% CI	Lower CL	Upper CL	Density (km^{-2})
West of Musengezi River (Magoe survey area)							
Magoe 1	495	67	80128	124.5	0	1112	1.42
Magoe 2	125	17	4962	121.0	0	276	0.36
Magoe 3	0	0	0	0.0	0	0	0.00
Magoe 4	284	31	39944	159.3	0	736	0.43
Magoe 5	561	74	153044	151.9	0	1414	0.75
Magoe 6	0	0	0	0.0	0	0	0.00
Subtotals	1465	189	278077	73.6	387	2544	0.56
East of Musengezi River							
Mukumbura 1	110	26	4228	121.7	0	244	0.09
Mukumbura 2	4	1	15	191.3	0	12	0.005
Mphende	62	16	1698	138.2	0	148	0.08
Mukumbura 3	27	7	405	155.9	0	69	0.03
Mukumbura 4	0	0	0	0.0	0	0	0.00
Chintholo 2	0	0	0	0.0	0	0	0.00
Chitima 1	4	1	9	168.6	0	10	0.007
Chitima 3	94	23	3902	148.2	0	233	0.18
Chitima 4	0	0	0	0.0	0	0	0.00
Chintholo 1	91	26	1909	100.4	0	182	0.13
Chitima 2	4	1	13	178.3	0	12	0.00
Kachembe	0	0	0	0.0	0	0	0.00
Chintholo 3	0	0	0	0.0	0	0	0.00
Chintholo 4	0	0	0	0.0	0	0	0.00
Chipembere	124	33	2641	85.5	18	229	0.09
Luenha	0	0	0	0.0	0	0	0.00
Subtotals	519	134	14821	46.7	277	762	0.04
Totals	**1985**	**323**	**292899**	**55.5**	**882**	**3087**	**0.12**

Table 6. Population estimates and statistics for Elephant bulls south of Lake Cabora Bassa

Stratum	Estimate	No. Seen	Variance	% CI	Lower CL	Upper CL	Density (km^{-2})
West of Musengezi River (Magoe survey area)							
Magoe 1	118	16	3167	103.7	0	241	0.34
Magoe 2	22	3	207	139.9	0	53	0.06
Magoe 3	0	0	0	0.0	0	0	0.00
Magoe 4	0	0	0	0.0	0	0	0.00
Magoe 5	15	2	184	194.6	0	45	0.02
Magoe 6	0	0	0	0.0	0	0	0.00
Subtotals	156	21	3557	81.7	28	283	0.06
East of Musengezi River							
Mukumbura 1	0	0	0	0.0	0	0	0.00
Mukumbura 2	4	1	15	191.3	0	12	0.005
Mphende	0	0	0	0.0	0	0	0.00
Mukumbura 3	4	1	11	179.5	0	11	0.005
Mukumbura 4	0	0	0	0.0	0	0	0.00
Chintholo 2	0	0	0	0.0	0	0	0.00
Chitima 1	4	1	9	168.6	0	10	0.007
Chitima 3	0	0	0	0.0	0	0	0.00
Chitima 4	0	0	0	0.0	0	0	0.00
Chintholo 1	7	2	35	177.6	0	19	0.010
Chitima 2	4	1	13	178.3	0	12	0.003
Kachembe	0	0	0	0.0	0	0	0.00
Chintholo 3	0	0	0	0.0	0	0	0.00
Chintholo 4	0	0	0	0.0	0	0	0.00
Chipembere	34	9	305	106.6	0	70	0.02
Luenha	0	0	0	0.0	0	0	0.00
Subtotals	57	15	389	70.3	17	97	0.004
Totals	**212**	**36**	**3946**	**62.2**	**80**	**344**	**0.013**

Table 7. Population estimates and statistics for Elephant cows south of Lake Cabora Bassa

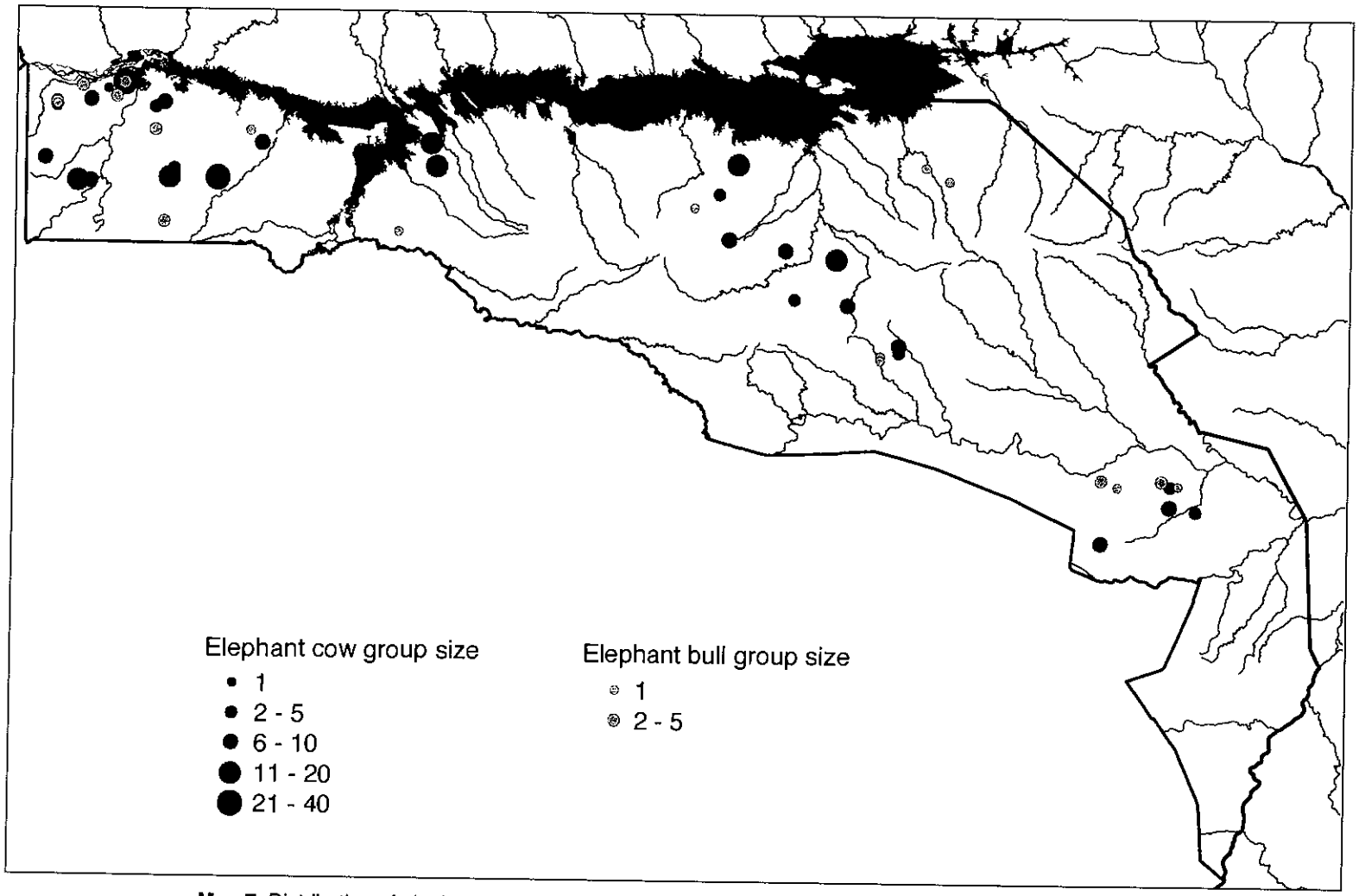
Stratum	Estimate	No. Seen	Variance	% CI	Lower CL	Upper CL	Density (km^{-2})
West of Musengezi River (Magoe survey area)							
Magoe 1	377	51	76962	160.3	0	982	1.08
Magoe 2	103	14	4755	143.8	0	251	0.30
Magoe 3	0	0	0	0.0	0	0	0.00
Magoe 4	284	31	39944	159.3	0	736	0.43
Magoe 5	546	72	152860	156.0	0	1398	0.73
Magoe 6	0	0	0	0.0	0	0	0.00
Subtotals	1310	168	274520	81.9	237	2383	0.50
East of Musengezi River							
Mukumbura 1	110	26	4228	121.7	0	244	0.09
Mukumbura 2	0	0	0	0.0	0	0	0.00
Mphende	62	16	1698	138.2	0	148	0.08
Mukumbura 3	23	6	394	179.4	0	65	0.03
Mukumbura 4	0	0	0	0.0	0	0	0.00
Chintholo 2	0	0	0	0.0	0	0	0.00
Chitima 1	0	0	0	0.0	0	0	0.00
Chitima 3	94	23	3902	148.2	0	233	0.18
Chitima 4	0	0	0	0.0	0	0	0.00
Chintholo 1	84	24	1874	107.8	0	174	0.12
Chitima 2	0	0	0	0.0	0	0	0.00
Kachembe	0	0	0	0.0	0	0	0.00
Chintholo 3	0	0	0	0.0	0	0	0.00
Chintholo 4	0	0	0	0.0	0	0	0.00
Chipembere	90	24	2335	110.5	0	189	0.06
Luenha	0	0	0	0.0	0	0	0.00
Subtotals	463	119	14432	51.7	223	702	0.03
Totals	**1773**	**287**	**288952**	**61.8**	**676**	**2869**	**0.11**

Table 8. Population estimates and statistics for Elephant Carcasses (age category 3) south of Lake Cabora Bassa

Stratum	Estimate	No. Seen	Variance	% CI	Lower CL	Upper CL	Density (km^{-2})
West of Musengezi River (Magoe survey area)							
Magoe 1	30	4	254	117.4	0	64	0.09
Magoe 2	15	2	81	131.2	0	34	0.04
Magoe 3	0	0	0	0.0	0	0	0.00
Magoe 4	64	7	189	48.6	33	95	0.10
Magoe 5	91	12	400	47.9	47	135	0.12
Magoe 6	0	0	0	0.0	0	0	0.00
Subtotals	199	25	924	30.9	138	261	0.08
East of Musengezi River							
Mukumbura 1	8	2	26	123.2	0	19	0.007
Mukumbura 2	0	0	0	0.0	0	0	0.00
Mphende	0	0	0	0.0	0	0	0.00
Mukumbura 3	0	0	0	0.0	0	0	0.00
Mukumbura 4	4	1	13	184.0	0	12	0.005
Chintholo 2	0	0	0	0.0	0	0	0.00
Chitima 1	0	0	0	0.0	0	0	0.00
Chitima 3	0	0	0	0.0	0	0	0.00
Chitima 4	0	0	0	0.0	0	0	0.00
Chintholo 1	0	0	0	0.0	0	0	0.00
Chitima 2	4	1	14	182.4	0	12	0.003
Kachembe	0	0	0	0.0	0	0	0.00
Chintholo 3	0	0	0	0.0	0	0	0.00
Chintholo 4	0	0	0	0.0	0	0	0.00
Chipembere	0	0	0	0.0	0	0	0.00
Luenha	0	0	0	0.0	0	0	0.00
Subtotals	17	4	52	86.3	2	31	0.001
Totals	**216**	**29**	**976**	**29.2**	**153**	**279**	**0.013**

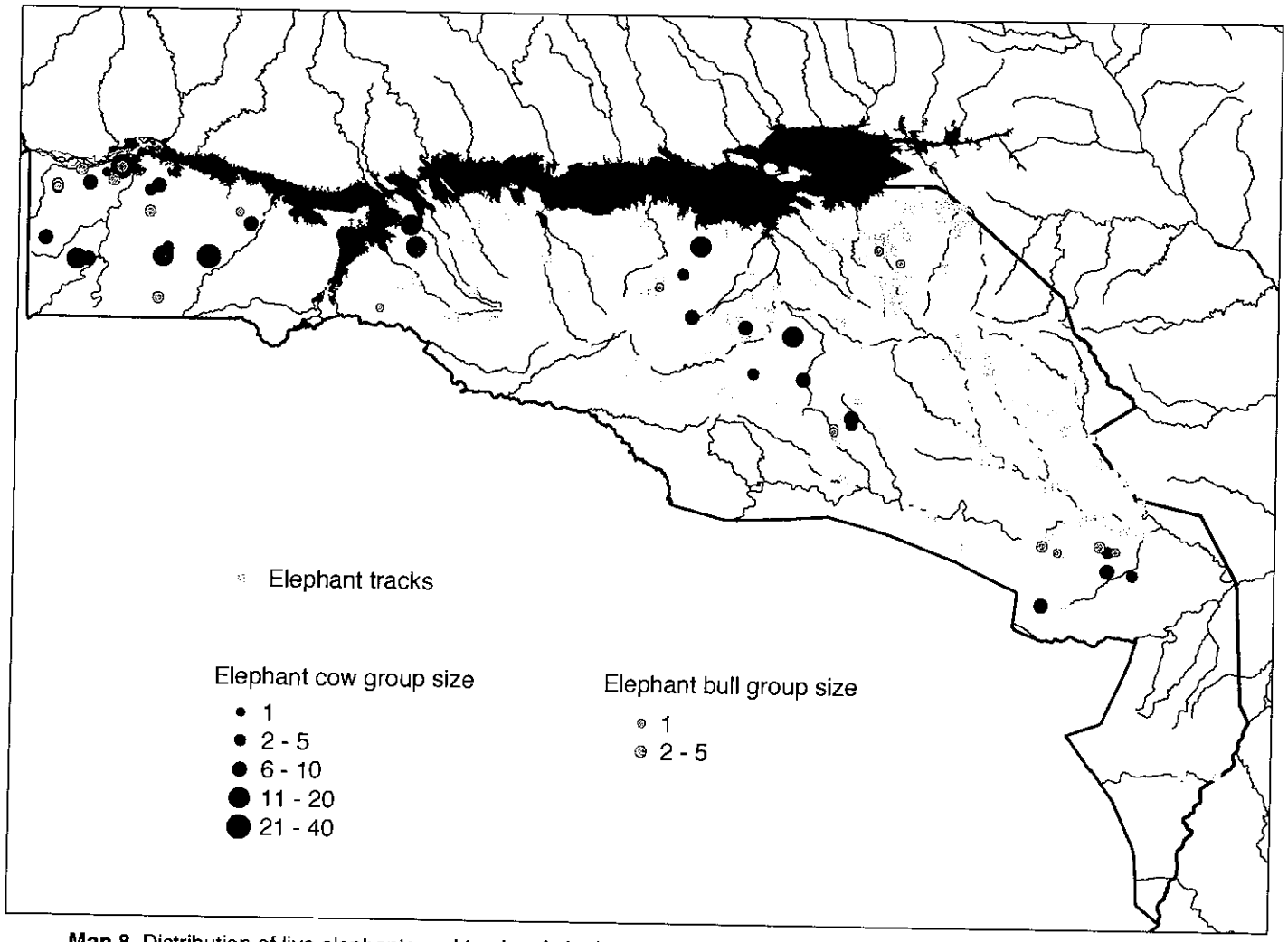
Table 9. Population estimates and statistics for Elephant Carcasses (age category 4) south of Lake Cabora Bassa

Stratum	Estimate	No. Seen	Variance	% CI	Lower CL	Upper CL	Density (km^{-2})
West of Musengezi River (Magoe survey area)							
Magoe 1	0	0	0	0.0	0	0	0.00
Magoe 2	0	0	0	0.0	0	0	0.00
Magoe 3	0	0	0	0.0	0	0	0.00
Magoe 4	0	0	0	0.0	0	0	0.00
Magoe 5	23	3	211	139.3	0	54	0.03
Magoe 6	0	0	0	0.0	0	0	0.00
Subtotals	23	3	211	139.2	0	54	0.01
East of Musengezi River							
Mukumbura 1	13	3	35	95.7	1	25	0.01
Mukumbura 2	0	0	0	0.0	0	0	0.00
Mphende	0	0	0	0.0	0	0	0.00
Mukumbura 3	4	1	11	179.2	0	11	0.005
Mukumbura 4	0	0	0	0.0	0	0	0.00
Chintholo 2	0	0	0	0.0	0	0	0.00
Chitima 1	0	0	0	0.0	0	0	0.00
Chitima 3	4	1	13	194.3	0	12	0.008
Chitima 4	0	0	0	0.0	0	0	0.00
Chintholo 1	3	1	8	172.9	0	10	0.005
Chitima 2	8	2	26	124.8	0	19	0.007
Kachembe	4	1	15	190.6	0	12	0.006
Chintholo 3	0	0	0	0.0	0	0	0.00
Chintholo 4	8	2	20	121.2	0	17	0.008
Chipembere	7	2	20	123.4	0	17	0.005
Luenha	0	0	0	0.0	0	0	0.00
Subtotals	52	13	148	46.3	28	76	0.004
Totals	**75**	**16**	**359**	**51.7**	**36**	**113**	**0.004**

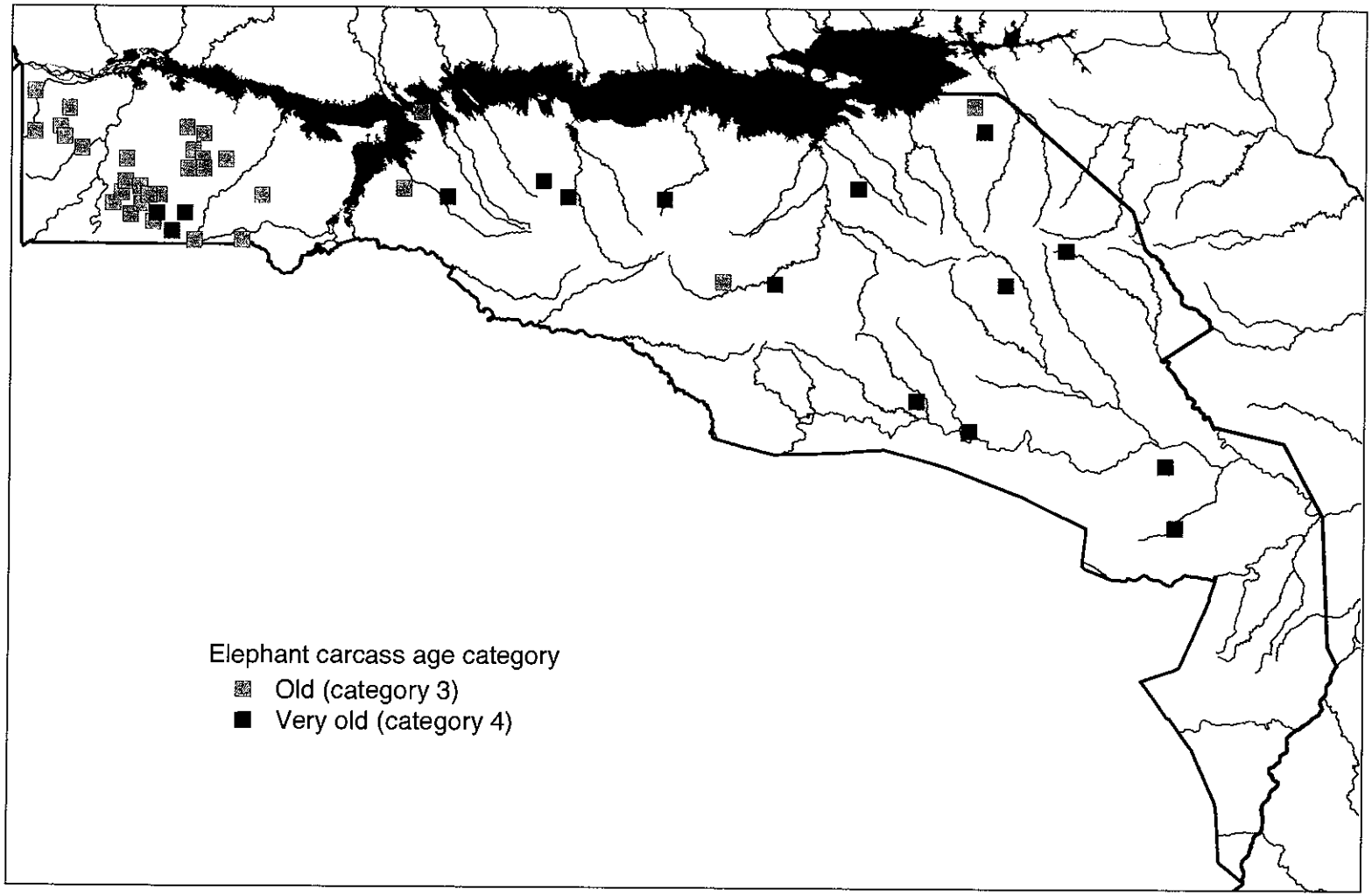


Map 7. Distribution of elephant south of Lake Cabora Bassa, Mozambique, during the 2010 dry season

The dots indicate the locations of elephants seen *within the search strips*, together with an indication of the size of each group. Small dots overlaying large dots indicate two or more groups of elephants in close proximity. Variation in dot density to the west and east of the Musengezi River reflects differences between regions in *both* the density of elephant groups *and* the sampling intensity. The red lines indicate international borders. The black line indicates the eastern boundary of the survey area.

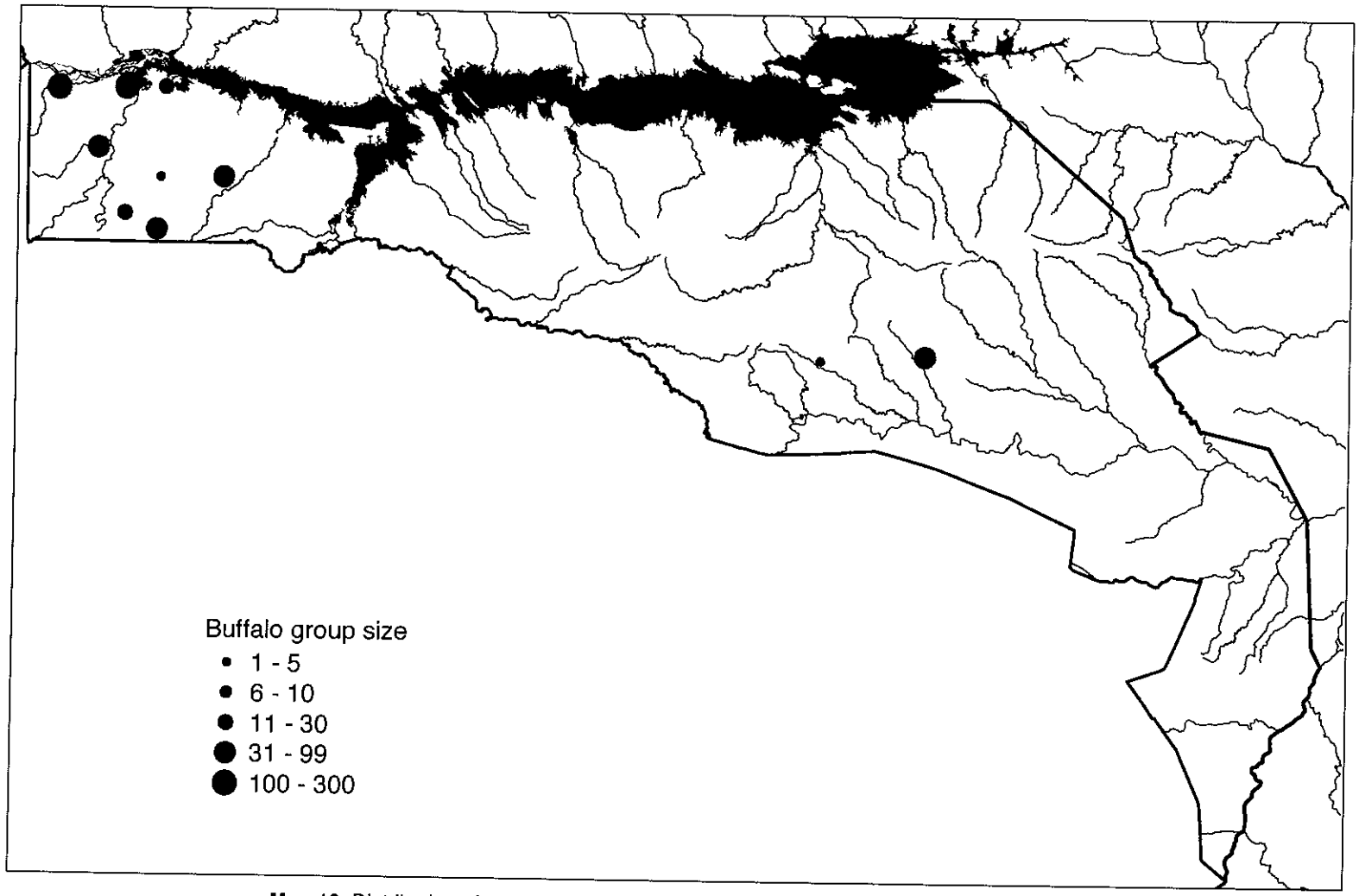


Map 8. Distribution of live elephants and tracks of elephants south of Lake Cabora Bassa during the 2010 dry season



Map 9. Distribution of elephant carcasses south of Lake Cabora Bassa during the 2010 dry season

No fresh (category 1) or recent (category 2) carcasses of elephant were seen during the surveys.



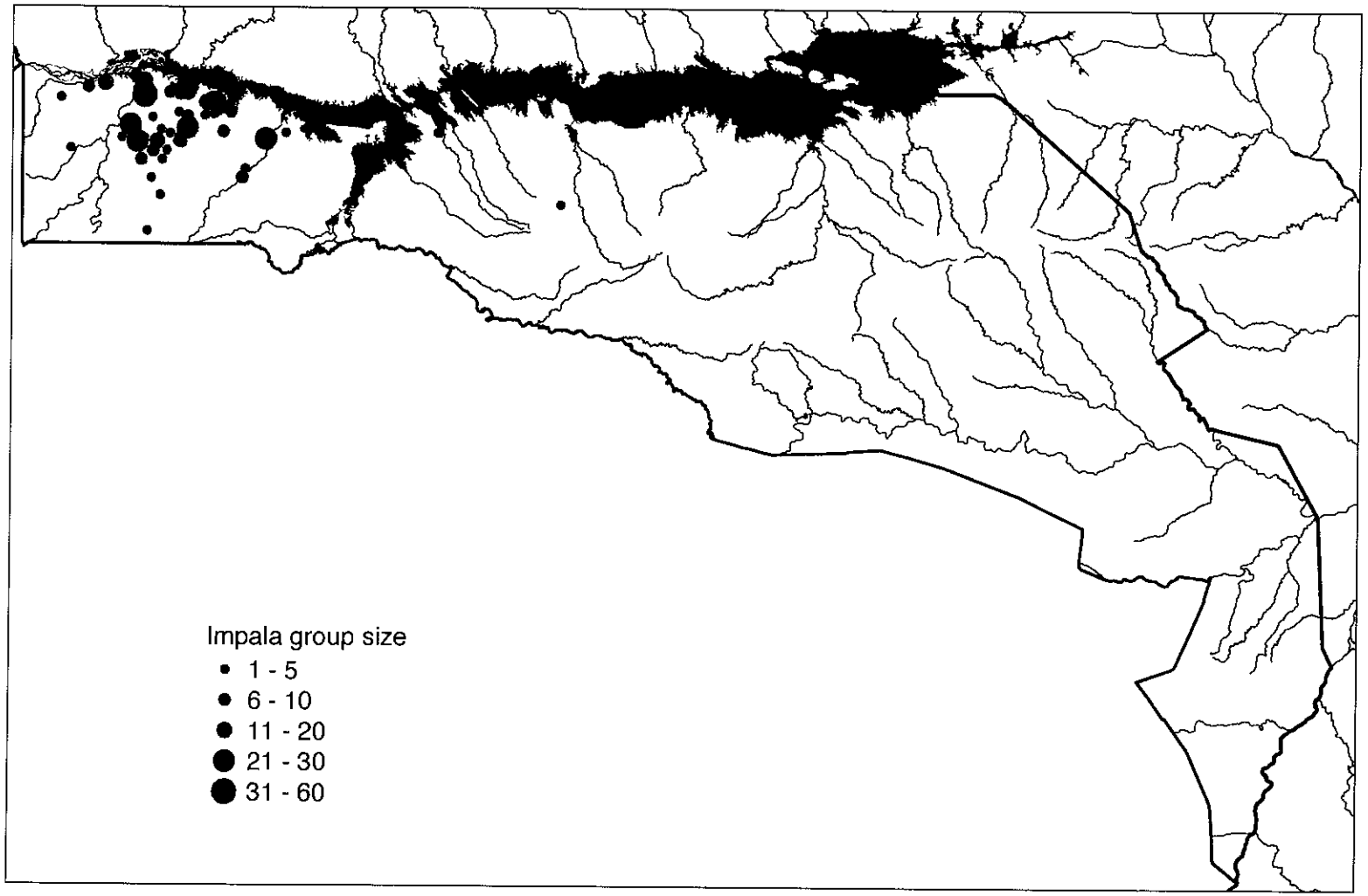
Map 10. Distribution of buffalo south of Lake Cabora Bassa during the 2010 dry season

Table 10. Population estimates and statistics for Buffalo south of Lake Cabora Bassa

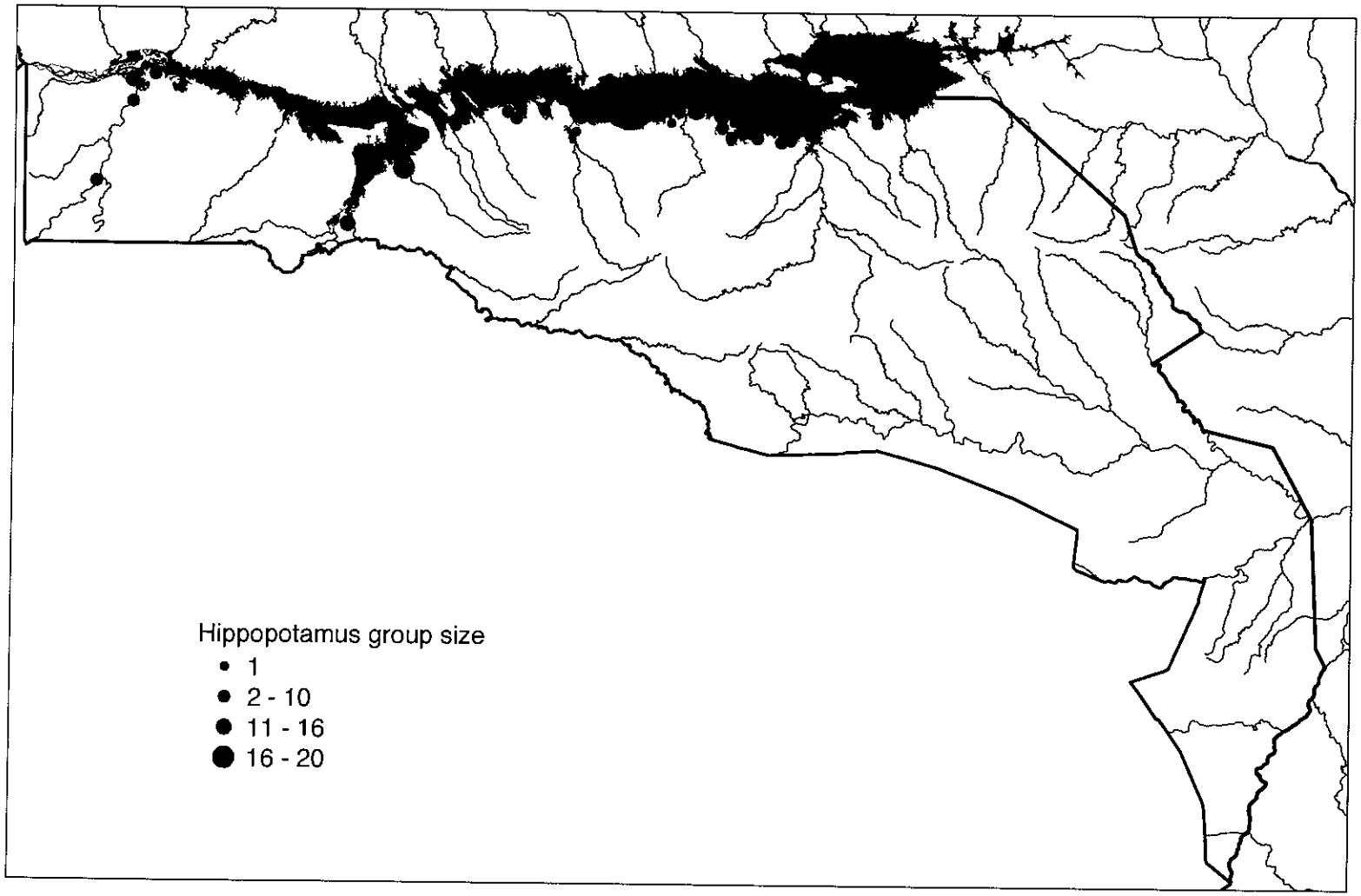
Stratum	Estimate	No. Seen	Variance	% CI	Lower CL	Upper CL	Density (km^{-2})
West of Musengezi River (Magoe survey area)							
Magoe 1	2957	400	4627962	158.5	0	7645	8.50
Magoe 2	96	13	7486	194.3	0	281	0.28
Magoe 3	0	0	0	0.0	0	0	0.00
Magoe 4	641	70	180581	150.0	0	1602	0.98
Magoe 5	789	104	226402	131.4	0	1826	1.06
Magoe 6	0	0	0	0.0	0	0	0.00
Subtotals	4483	587	5042431	107.4	0	9299	1.71
East of Musengezi River							
Mukumbura 1	0	0	0	0.0	0	0	0.00
Mukumbura 2	0	0	0	0.0	0	0	0.00
Mphende	0	0	0	0.0	0	0	0.00
Mukumbura 3	0	0	0	0.0	0	0	0.00
Mukumbura 4	0	0	0	0.0	0	0	0.00
Chintholo 2	0	0	0	0.0	0	0	0.00
Chitima 1	0	0	0	0.0	0	0	0.00
Chitima 3	0	0	0	0.0	0	0	0.00
Chitima 4	0	0	0	0.0	0	0	0.00
Chintholo 1	143	41	14709	176.7	0	396	0.20
Chitima 2	0	0	0	0.0	0	0	0.00
Kachembe	0	0	0	0.0	0	0	0.00
Chintholo 3	0	0	0	0.0	0	0	0.00
Chintholo 4	0	0	0	0.0	0	0	0.00
Chipembere	0	0	0	0.0	0	0	0.00
Luenha	0	0	0	0.0	0	0	0.00
Subtotals	143	41	14709	176.7	0	396	0.010
Totals	**4626**	**628**	**5057140**	**104.3**	**0**	**9449**	**0.28**

Table 11. Population estimates and statistics for Impala south of Lake Cabora Bassa

Stratum	Estimate	No. Seen	Variance	% CI	Lower CL	Upper CL	Density (km^{-2})
West of Musengezi River (Magoe survey area)							
Magoe 1	421	57	49630	115.2	0	907	1.21
Magoe 2	2263	308	446420	63.3	830	3696	6.60
Magoe 3	25	2	91	106.0	0	52	0.19
Magoe 4	37	4	1294	222.2	0	118	0.06
Magoe 5	683	90	94429	98.1	13	1352	0.91
Magoe 6	0	0	0	0.0	0	0	0.00
Subtotals	3429	461	591864	46.4	1837	5020	1.31
East of Musengezi River							
Mukumbura 1	17	4	127	136.9	0	40	0.01
Mukumbura 2	0	0	0	0.0	0	0	0.00
Mphende	0	0	0	0.0	0	0	0.00
Mukumbura 3	0	0	0	0.0	0	0	0.00
Mukumbura 4	0	0	0	0.0	0	0	0.00
Chintholo 2	0	0	0	0.0	0	0	0.00
Chitima 1	0	0	0	0.0	0	0	0.00
Chitima 3	0	0	0	0.0	0	0	0.00
Chitima 4	0	0	0	0.0	0	0	0.00
Chintholo 1	0	0	0	0.0	0	0	0.00
Chitima 2	0	0	0	0.0	0	0	0.00
Kachembe	0	0	0	0.0	0	0	0.00
Chintholo 3	0	0	0	0.0	0	0	0.00
Chintholo 4	0	0	0	0.0	0	0	0.00
Chipembere	0	0	0	0.0	0	0	0.00
Luenha	0	0	0	0.0	0	0	0.00
Subtotals	17	4	127	136.9	0	40	0.001
Totals	**3446**	**465**	**591991**	**46.2**	**1854**	**5037**	**0.21**



Map 11. Distribution of impala south of Lake Cabora Bassa during the 2010 dry season



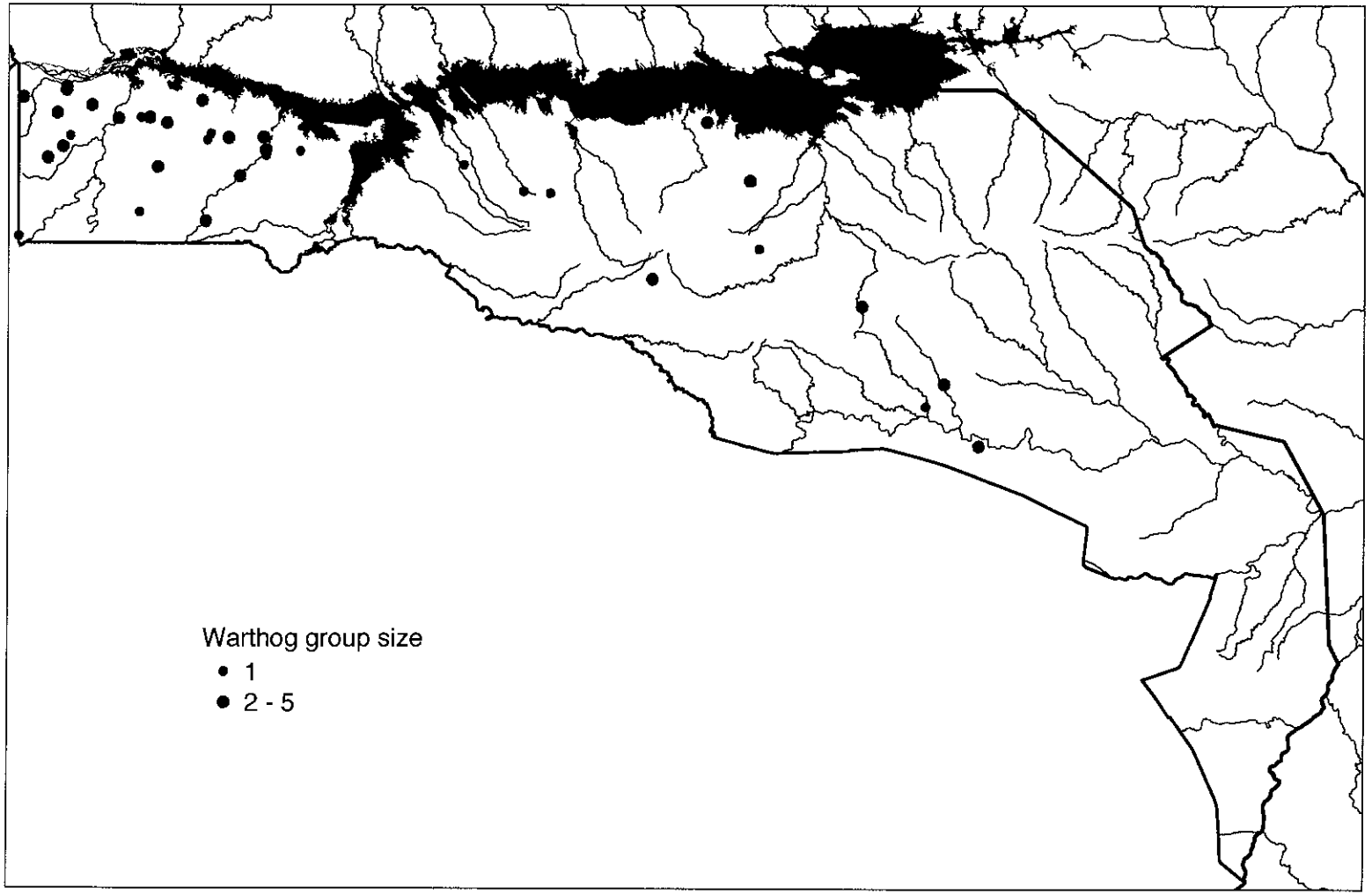
Map 12. Distribution of hippopotamus south of Lake Cabora Bassa during the 2010 dry season

Table 12. Population estimates and statistics for Hippopotamus south of Lake Cabora Bassa

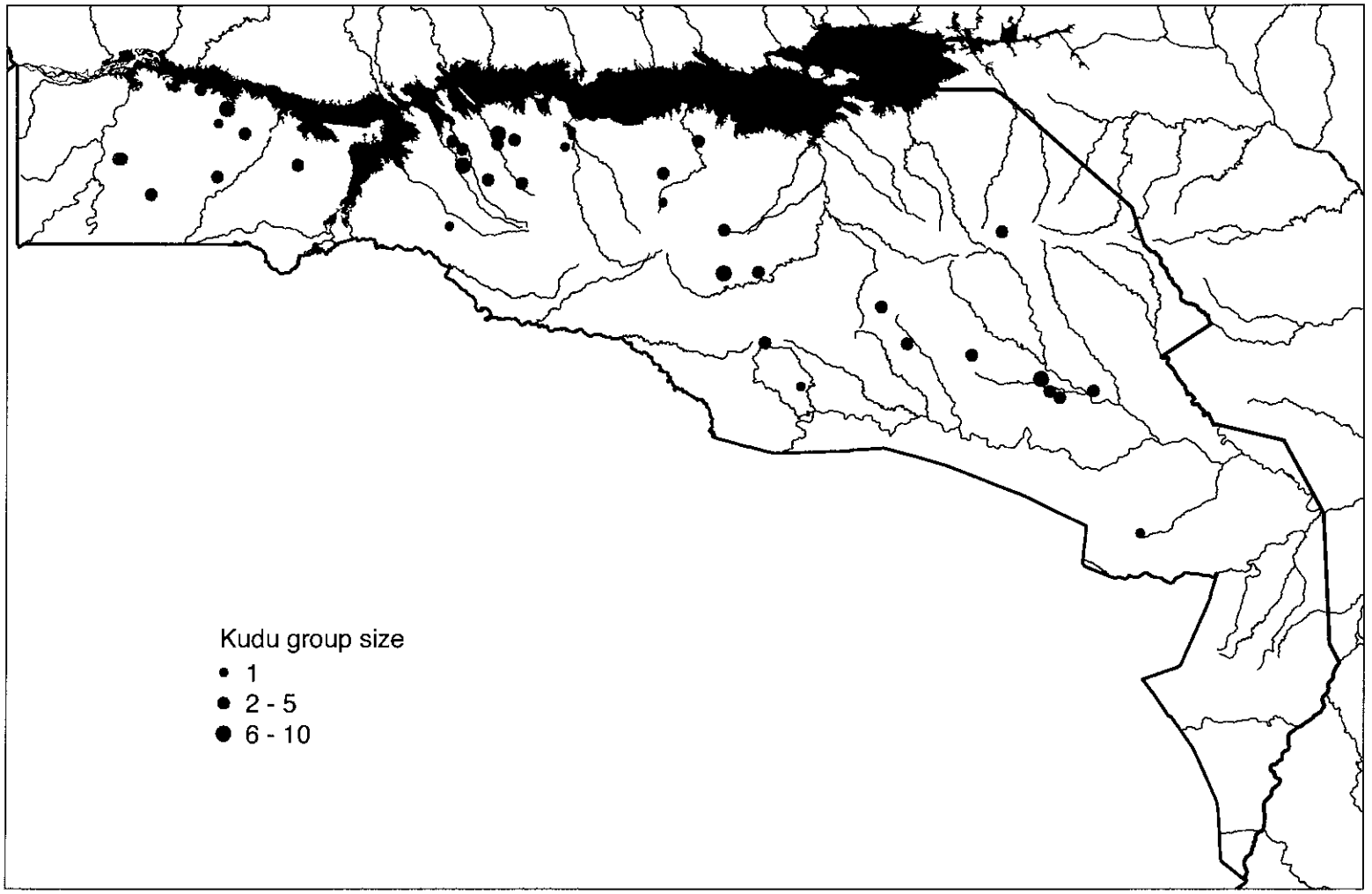
Stratum	Estimate	No. Seen	Variance	% CI	Lower CL	Upper CL	Density (km^{-2})
West of Musengezi River (Magoe survey area)							
Magoe 1	140	19	17748	206.7	0	431	0.40
Magoe 2	29	4	702	193.4	0	86	0.09
Magoe 3	75	6	7184	313.3	0	310	0.56
Magoe 4	37	4	1293	222.1	0	118	0.06
Magoe 5	0	0	0	0.0	0	0	0.00
Magoe 6	0	0	0	0.0	0	0	0.00
Subtotals	282	33	26927	122.4	0	626	0.11
East of Musengezi River							
Mukumbura 1	321	76	14300	76.6	75	567	0.26
Mukumbura 2	55	13	2609	191.5	0	159	0.07
Mphende	163	42	3334	73.8	43	284	0.22
Mukumbura 3	0	0	0	0.0	0	0	0.00
Mukumbura 4	0	0	0	0.0	0	0	0.00
Chintholo 2	0	0	0	0.0	0	0	0.00
Chitima 1	90	24	1417	87.3	11	169	0.16
Chitima 3	0	0	0	0.0	0	0	0.00
Chitima 4	0	0	0	0.0	0	0	0.00
Chintholo 1	0	0	0	0.0	0	0	0.00
Chitima 2	0	0	0	0.0	0	0	0.00
Kachembe	0	0	0	0.0	0	0	0.00
Chintholo 3	0	0	0	0.0	0	0	0.00
Chintholo 4	0	0	0	0.0	0	0	0.00
Chipembere	0	0	0	0.0	0	0	0.00
Luenha	0	0	0	0.0	0	0	0.00
Subtotals	629	155	21659	46.9	334	924	0.05
Totals	**911**	**188**	**48586**	**48.6**	**468**	**1354**	**0.05**

Table 13. Population estimates and statistics for Warthog south of Lake Cabora Bassa

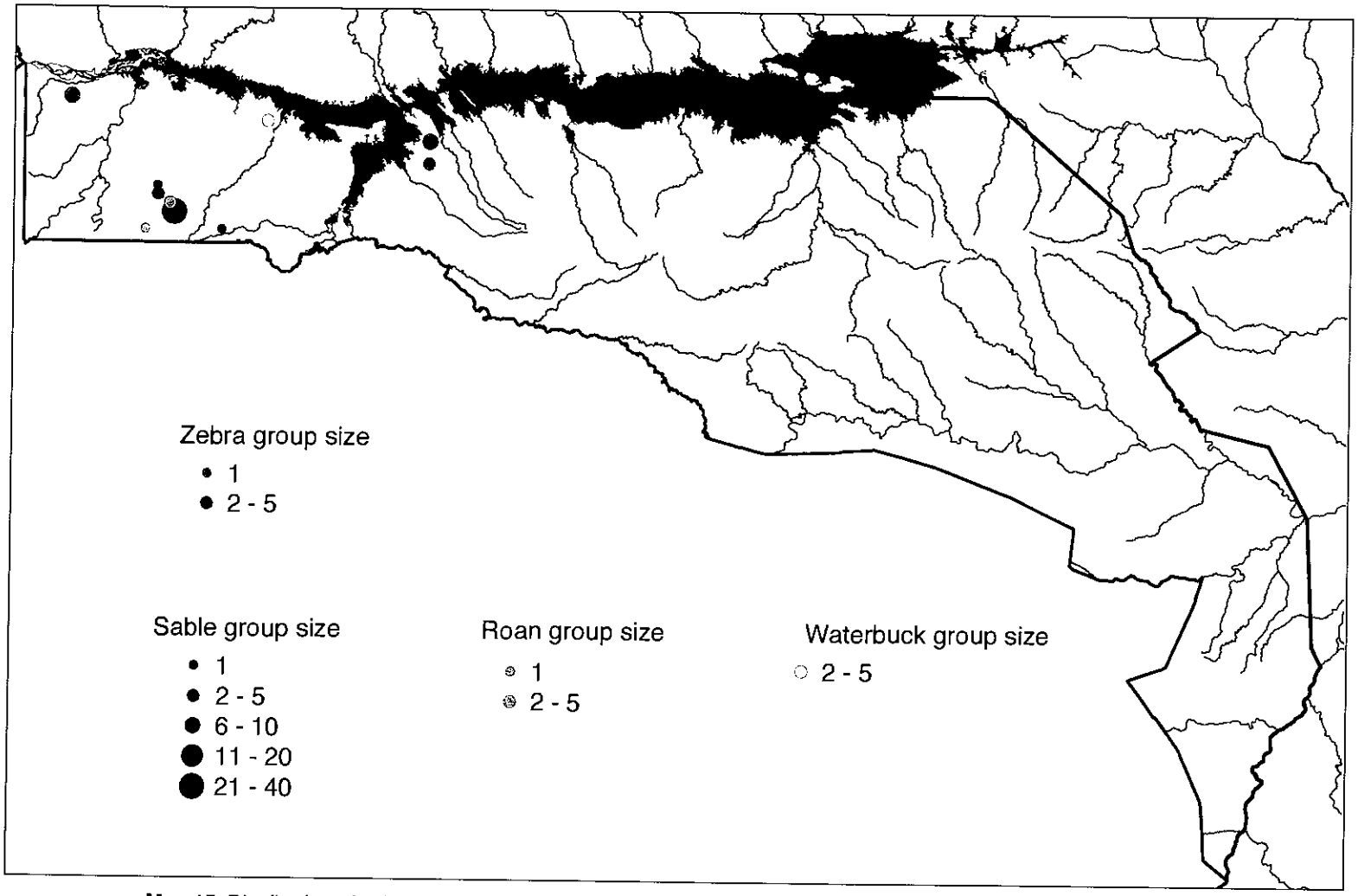
Stratum	Estimate	No. Seen	Variance	% CI	Lower CL	Upper CL	Density (km^{-2})
West of Musengezi River (Magoe survey area)							
Magoe 1	118	16	3303	105.9	0	244	0.34
Magoe 2	125	17	1565	67.9	40	210	0.36
Magoe 3	50	4	751	151.9	0	126	0.37
Magoe 4	55	6	573	98.5	1	109	0.08
Magoe 5	83	11	960	80.9	16	151	0.11
Magoe 6	0	0	0	0.0	0	0	0.00
Subtotals	432	54	7151	39.7	260	603	0.16
East of Musengezi River							
Mukumbura 1	13	3	35	96.0	1	25	0.01
Mukumbura 2	0	0	0	0.0	0	0	0.00
Mphende	31	8	343	124.2	0	70	0.04
Mukumbura 3	4	1	11	180.4	0	11	0.005
Mukumbura 4	8	2	53	187.3	0	23	0.011
Chintholo 2	0	0	0	0.0	0	0	0.00
Chitima 1	0	0	0	0.0	0	0	0.00
Chitima 3	0	0	0	0.0	0	0	0.00
Chitima 4	0	0	0	0.0	0	0	0.00
Chintholo 1	17	5	216	175.7	0	48	0.03
Chitima 2	0	0	0	0.0	0	0	0.00
Kachembe	0	0	0	0.0	0	0	0.00
Chintholo 3	0	0	0	0.0	0	0	0.00
Chintholo 4	23	6	138	105.6	0	47	0.02
Chipembere	0	0	0	0.0	0	0	0.00
Luenha	0	0	0	0.0	0	0	0.00
Subtotals	96	25	796	58.5	40	153	0.01
Totals	**528**	**79**	**7947**	**34.0**	**348**	**707**	**0.03**



Map 13. Distribution of warthog south of Lake Cabora Bassa during the 2010 dry season



Map 14. Distribution of kudu south of Lake Cabora Bassa during the 2010 dry season



Map 15. Distribution of sable, roan, waterbuck and zebra south of Lake Cabora Bassa during the 2010 dry season

Table 14. Population estimates and statistics for Kudu south of Lake Cabora Bassa

Stratum	Estimate	No. Seen	Variance	% CI	Lower CL	Upper CL	Density (km^{-2})
West of Musengezi River (Magoe survey area)							
Magoe 1	0	0	0	0.0	0	0	0.00
Magoe 2	140	19	4848	107.0	0	289	0.41
Magoe 3	0	0	0	0.0	0	0	0.00
Magoe 4	46	5	2019	222.0	0	147	0.07
Magoe 5	53	7	1045	132.6	0	124	0.07
Magoe 6	28	2	649	226.0	0	90	0.07
Subtotals	266	33	8561	70.9	77	455	0.10
East of Musengezi River							
Mukumbura 1	144	34	2800	75.7	35	252	0.12
Mukumbura 2	4	1	15	188.0	0	12	0.005
Mphende	31	8	323	120.6	0	69	0.04
Mukumbura 3	50	13	942	127.9	0	114	0.06
Mukumbura 4	0	0	0	0.0	0	0	0.00
Chintholo 2	4	1	11	173.1	0	11	0.01
Chitima 1	0	0	0	0.0	0	0	0.00
Chitima 3	0	0	0	0.0	0	0	0.00
Chitima 4	0	0	0	0.0	0	0	0.00
Chintholo 1	31	9	255	106.1	0	65	0.05
Chitima 2	13	3	121	180.6	0	35	0.01
Kachembe	0	0	0	0.0	0	0	0.00
Chintholo 3	80	20	1084	84.2	13	148	0.06
Chintholo 4	0	0	0	0.0	0	0	0.00
Chipembere	4	1	11	179.3	0	10	0.00
Luenha	0	0	0	0.0	0	0	0.00
Subtotals	361	90	5562	41.2	212	509	0.03
Totals	**627**	**123**	**14123**	**37.8**	**390**	**864**	**0.04**

Table 15. Population estimates and statistics for Zebra south of Lake Cabora Bassa

Stratum	Estimate	No. Seen	Variance	% CI	Lower CL	Upper CL	Density (km^{-2})
West of Musengezi River (Magoe survey area)							
Magoe 1	59	8	3210	208.7	0	183	0.17
Magoe 2	0	0	0	0.0	0	0	0.00
Magoe 3	0	0	0	0.0	0	0	0.00
Magoe 4	0	0	0	0.0	0	0	0.00
Magoe 5	0	0	0	0.0	0	0	0.00
Magoe 6	0	0	0	0.0	0	0	0.00
Subtotals	59	8	3210	208.7	0	183	0.02
East of Musengezi River							
Mukumbura 1	51	12	1874	175.6	0	140	0.04
Mukumbura 2	0	0	0	0.0	0	0	0.00
Mphende	0	0	0	0.0	0	0	0.00
Mukumbura 3	0	0	0	0.0	0	0	0.00
Mukumbura 4	0	0	0	0.0	0	0	0.00
Chintholo 2	0	0	0	0.0	0	0	0.00
Chitima 1	0	0	0	0.0	0	0	0.00
Chitima 3	0	0	0	0.0	0	0	0.00
Chitima 4	0	0	0	0.0	0	0	0.00
Chintholo 1	0	0	0	0.0	0	0	0.00
Chitima 2	0	0	0	0.0	0	0	0.00
Kachembe	0	0	0	0.0	0	0	0.00
Chintholo 3	0	0	0	0.0	0	0	0.00
Chintholo 4	0	0	0	0.0	0	0	0.00
Chipembere	0	0	0	0.0	0	0	0.00
Luenha	0	0	0	0.0	0	0	0.00
Subtotals	51	12	1874	175.6	0	140	0.004
Totals	**110**	**20**	**5085**	**133.4**	**0**	**256**	**0.01**

Table 16. Population estimates and statistics for Waterbuck south of Lake Cabora Bassa

Stratum	Estimate	No. Seen	Variance	% CI	Lower CL	Upper CL	Density (km^{-2})
West of Musengezi River (Magoe survey area)							
Magoe 1	0	0	0	0.0	0	0	0.00
Magoe 2	0	0	0	0.0	0	0	0.00
Magoe 3	50	4	1650	225.2	0	163	0.37
Magoe 4	0	0	0	0.0	0	0	0.00
Magoe 5	0	0	0	0.0	0	0	0.00
Magoe 6	0	0	0	0.0	0	0	0.00
Subtotals	50	4	1650	225.3	0	163	0.02
East of Musengezi River							
Mukumbura 1	0	0	0	0.0	0	0	0.00
Mukumbura 2	0	0	0	0.0	0	0	0.00
Mphende	0	0	0	0.0	0	0	0.00
Mukumbura 3	0	0	0	0.0	0	0	0.00
Mukumbura 4	0	0	0	0.0	0	0	0.00
Chintholo 2	0	0	0	0.0	0	0	0.00
Chitima 1	0	0	0	0.0	0	0	0.00
Chitima 3	0	0	0	0.0	0	0	0.00
Chitima 4	0	0	0	0.0	0	0	0.00
Chintholo 1	0	0	0	0.0	0	0	0.00
Chitima 2	0	0	0	0.0	0	0	0.00
Kachembe	0	0	0	0.0	0	0	0.00
Chintholo 3	0	0	0	0.0	0	0	0.00
Chintholo 4	0	0	0	0.0	0	0	0.00
Chipembere	0	0	0	0.0	0	0	0.00
Luenha	0	0	0	0.0	0	0	0.00
Subtotals	0	0	0	0.0	0	0	0.00
Totals	**50**	**4**	**1650**	**225.3**	**0**	**163**	**0.003**

Table 17. Population estimates and statistics for Sable south of Lake Cabora Bassa

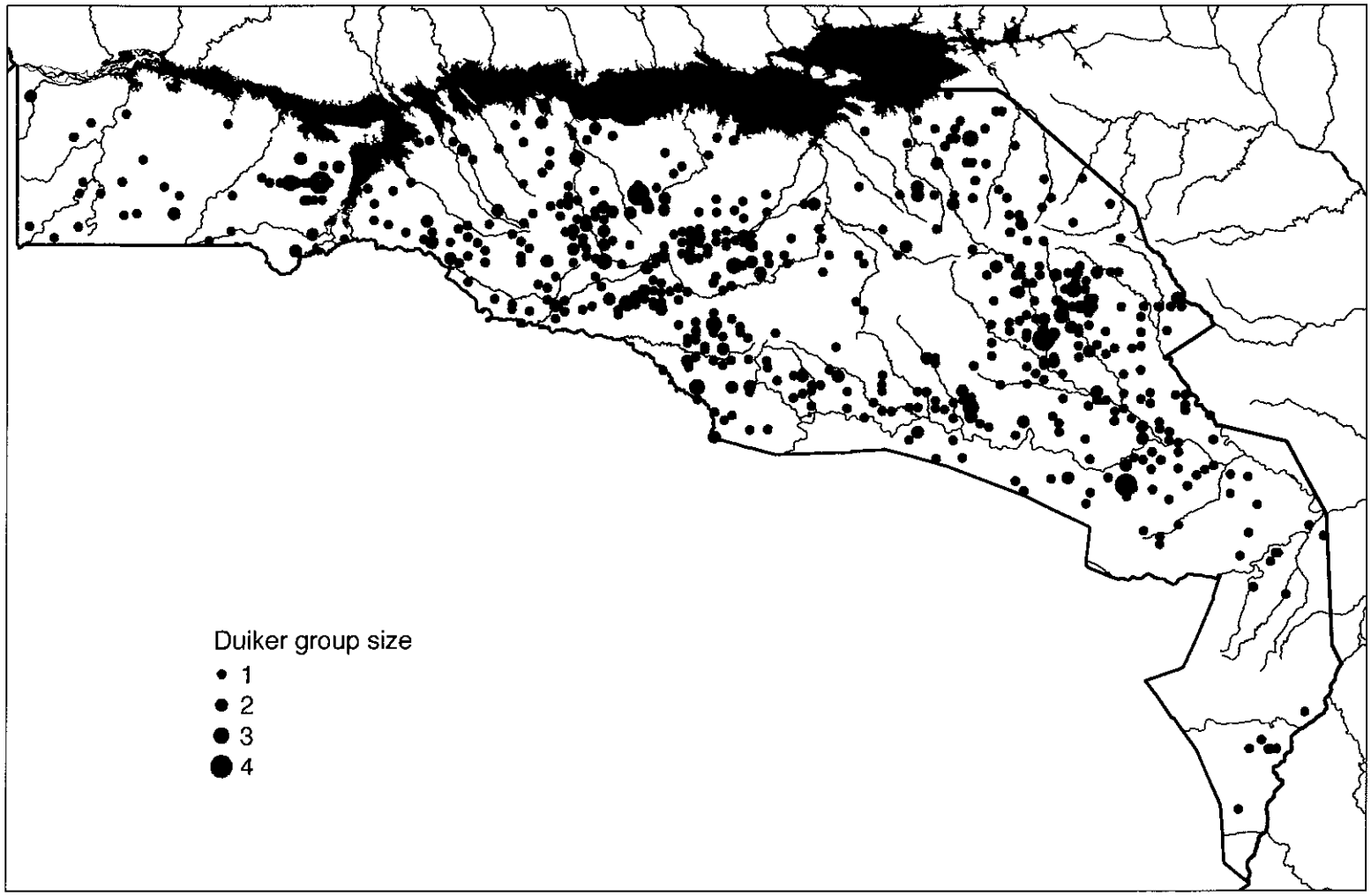
Stratum	Estimate	No. Seen	Variance	% CI	Lower CL	Upper CL	Density (km^{-2})
West of Musengezi River (Magoe survey area)							
Magoe 1	0	0	0	0.0	0	0	0.00
Magoe 2	0	0	0	0.0	0	0	0.00
Magoe 3	0	0	0	0.0	0	0	0.00
Magoe 4	0	0	0	0.0	0	0	0.00
Magoe 5	341	45	71853	171.1	0	925	0.46
Magoe 6	0	0	0	0.0	0	0	0.00
Subtotals	341	45	71853	171.1	0	925	0.13
East of Musengezi River							
Mukumbura 1	0	0	0	0.0	0	0	0.00
Mukumbura 2	0	0	0	0.0	0	0	0.00
Mphende	0	0	0	0.0	0	0	0.00
Mukumbura 3	0	0	0	0.0	0	0	0.00
Mukumbura 4	0	0	0	0.0	0	0	0.00
Chintholo 2	0	0	0	0.0	0	0	0.00
Chitima 1	0	0	0	0.0	0	0	0.00
Chitima 3	0	0	0	0.0	0	0	0.00
Chitima 4	0	0	0	0.0	0	0	0.00
Chintholo 1	0	0	0	0.0	0	0	0.00
Chitima 2	0	0	0	0.0	0	0	0.00
Kachembe	0	0	0	0.0	0	0	0.00
Chintholo 3	0	0	0	0.0	0	0	0.00
Chintholo 4	0	0	0	0.0	0	0	0.00
Chipembere	0	0	0	0.0	0	0	0.00
Luenha	0	0	0	0.0	0	0	0.00
Subtotals	0	0	0	0.0	0	0	0.00
Totals	**341**	**45**	**71853**	**171.1**	**0**	**925**	**0.02**

Table 18. Population estimates and statistics for Roan south of Lake Cabora Bassa

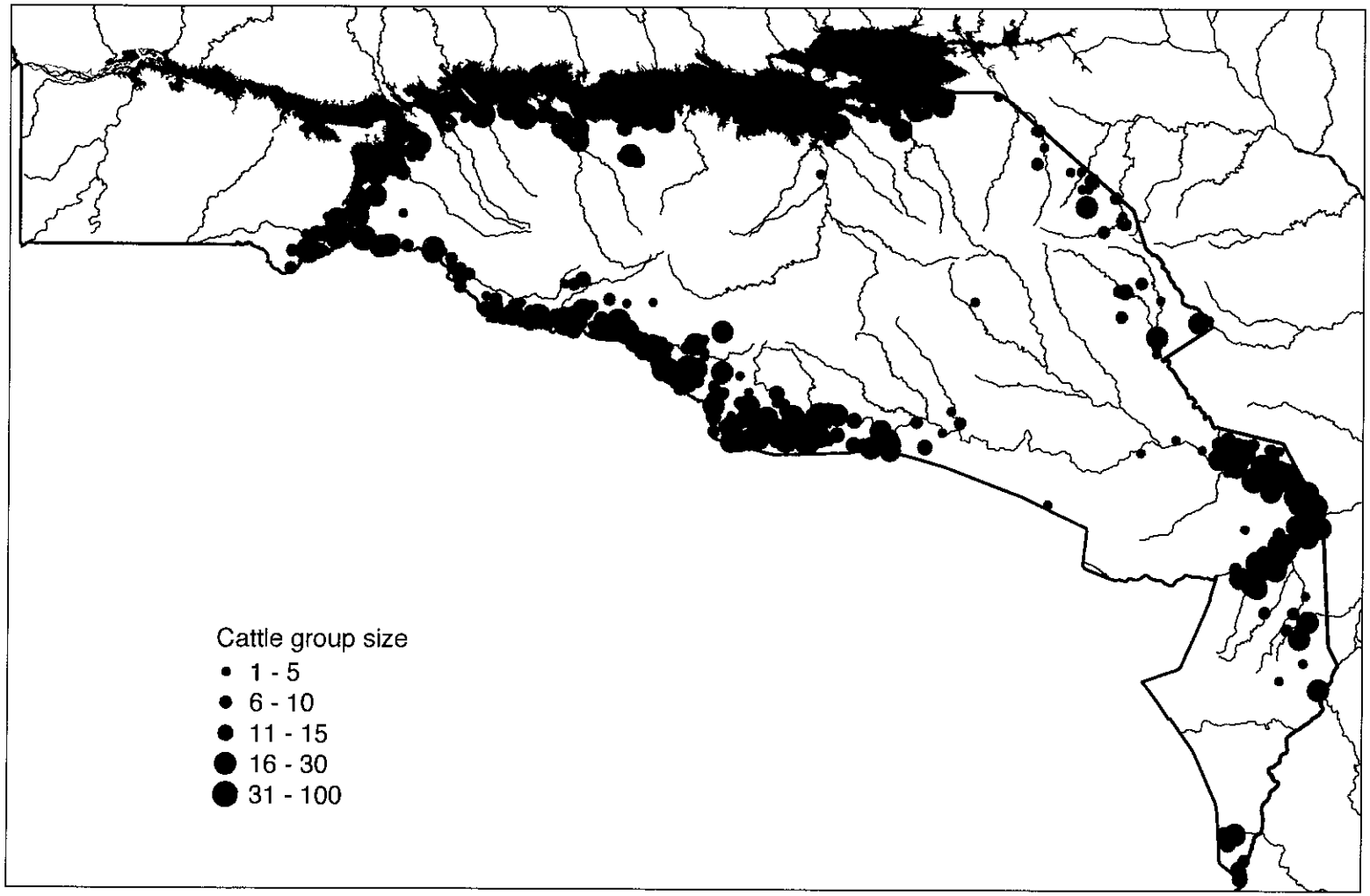
Stratum	Estimate	No. Seen	Variance	% CI	Lower CL	Upper CL	Density (km^{-2})
West of Musengezi River (Magoe survey area)							
Magoe 1	0	0	0	0.0	0	0	0.00
Magoe 2	0	0	0	0.0	0	0	0.00
Magoe 3	0	0	0	0.0	0	0	0.00
Magoe 4	0	0	0	0.0	0	0	0.00
Magoe 5	30	4	434	149.6	0	76	0.04
Magoe 6	0	0	0	0.0	0	0	0.00
Subtotals	30	4	434	149.6	0	76	0.01
East of Musengezi River							
Mukumbura 1	0	0	0	0.0	0	0	0.00
Mukumbura 2	0	0	0	0.0	0	0	0.00
Mphende	0	0	0	0.0	0	0	0.00
Mukumbura 3	0	0	0	0.0	0	0	0.00
Mukumbura 4	0	0	0	0.0	0	0	0.00
Chintholo 2	0	0	0	0.0	0	0	0.00
Chitima 1	0	0	0	0.0	0	0	0.00
Chitima 3	0	0	0	0.0	0	0	0.00
Chitima 4	0	0	0	0.0	0	0	0.00
Chintholo 1	0	0	0	0.0	0	0	0.00
Chitima 2	0	0	0	0.0	0	0	0.00
Kachembe	0	0	0	0.0	0	0	0.00
Chintholo 3	0	0	0	0.0	0	0	0.00
Chintholo 4	0	0	0	0.0	0	0	0.00
Chipembere	0	0	0	0.0	0	0	0.00
Luenha	0	0	0	0.0	0	0	0.00
Subtotals	0	0	0	0.0	0	0	0.00
Totals	**30**	**4**	**434**	**149.6**	**0**	**76**	**0.002**

Table 19. Population estimates and statistics for Grey Duiker south of Lake Cabora Bassa

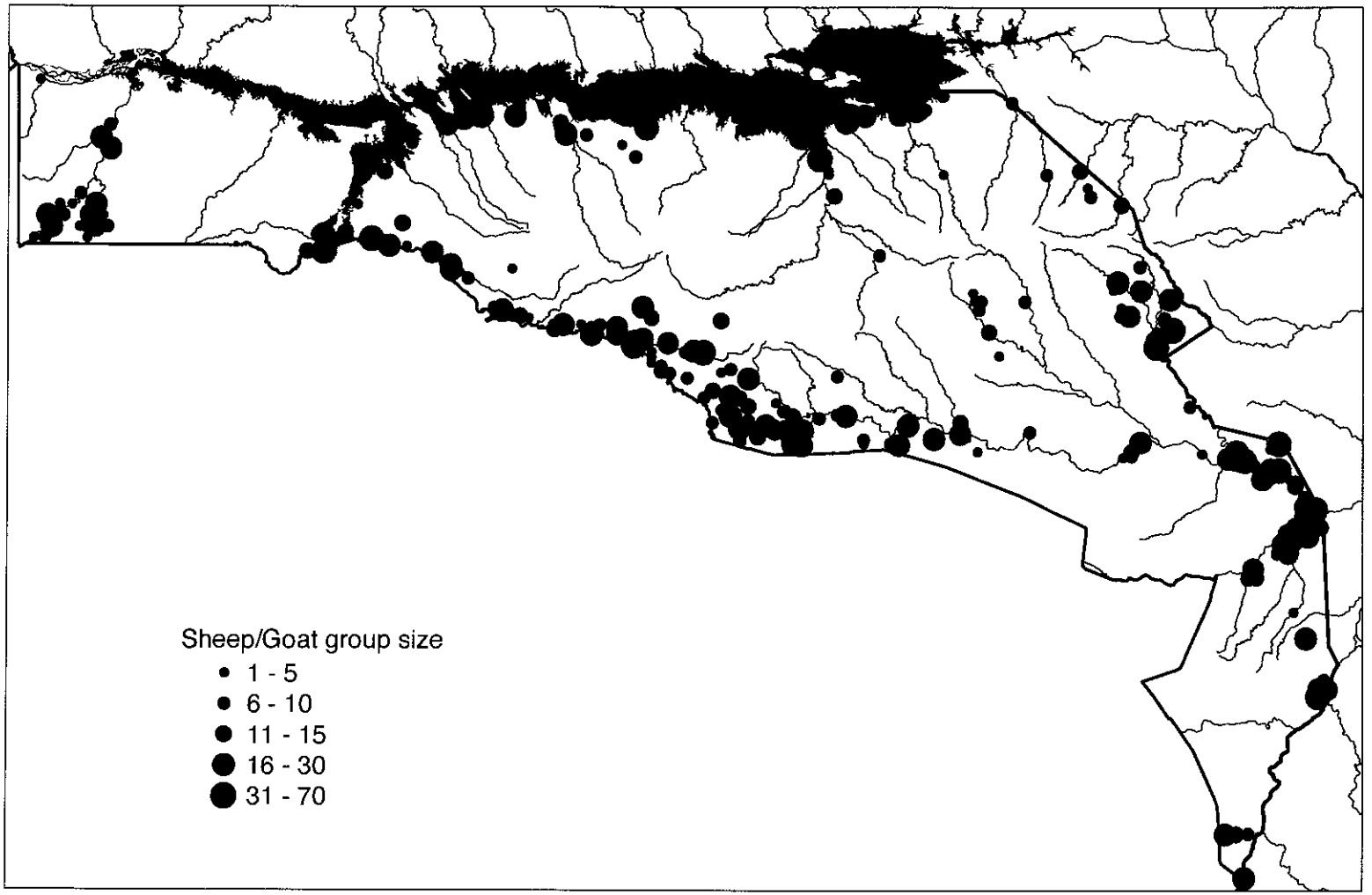
Stratum	Estimate	No. Seen	Variance	% CI	Lower CL	Upper CL	Density (km^{-2})
West of Musengezi River (Magoe survey area)							
Magoe 1	30	4	249	116.4	0	64	0.09
Magoe 2	7	1	47	200.7	0	22	0.02
Magoe 3	25	2	798	313.3	0	103	0.19
Magoe 4	82	9	615	68.1	26	138	0.13
Magoe 5	76	10	477	62.8	28	123	0.10
Magoe 6	414	30	45687	126.4	0	937	1.06
Subtotals	634	56	47874	84.4	99	1169	0.24
East of Musengezi River							
Mukumbura 1	173	41	617	29.5	122	224	0.14
Mukumbura 2	223	53	756	25.3	166	279	0.27
Mphende	66	17	327	57.1	28	104	0.09
Mukumbura 3	354	92	1430	22.3	275	433	0.45
Mukumbura 4	241	59	797	24.6	181	300	0.32
Chintholo 2	172	43	578	28.9	122	221	0.20
Chitima 1	15	4	26	71.1	4	26	0.03
Chitima 3	65	16	222	50.8	32	99	0.13
Chitima 4	62	15	310	63.7	22	101	0.11
Chintholo 1	31	9	101	66.8	10	52	0.05
Chitima 2	221	53	909	28.1	159	284	0.19
Kachembe	182	43	4293	75.5	45	320	0.26
Chintholo 3	329	82	1805	26.5	242	416	0.26
Chintholo 4	154	40	756	37.1	97	211	0.16
Chipembere	176	47	1197	40.4	105	247	0.12
Luenha	51	13	263	64.0	18	84	0.06
Subtotals	2515	627	14388	9.4	2278	2752	0.18
Totals	**3149**	**683**	**62262**	**17.4**	**2600**	**3698**	**0.19**



Map 16. Distribution of grey duiker south of Lake Cabora Bassa during the 2010 dry season



Map 17. Distribution of cattle south of Lake Cabora Bassa during the 2010 dry season



Map 18. Distribution of sheep and goats south of Lake Cabora Bassa during the 2010 dry season

Table 20. Population estimates and statistics for Cattle south of Lake Cabora Bassa

Stratum	Estimate	No. Seen	Variance	% CI	Lower CL	Upper CL	Density (km^{-2})
West of Musengezi River (Magoe survey area)							
Magoe 1	0	0	0	0.0	0	0	0.00
Magoe 2	0	0	0	0.0	0	0	0.00
Magoe 3	0	0	0	0.0	0	0	0.00
Magoe 4	0	0	0	0.0	0	0	0.00
Magoe 5	0	0	0	0.0	0	0	0.00
Magoe 6	1973	143	1912156	171.5	0	5356	5.03
Subtotals	1973	143	1912156	171.5	0	5356	0.75
East of Musengezi River							
Mukumbura 1	3240	767	535062	46.4	1736	4744	2.65
Mukumbura 2	2815	670	207682	33.2	1881	3748	3.43
Mphende	424	109	19282	68.4	134	713	0.57
Mukumbura 3	0	0	0	0.0	0	0	0.00
Mukumbura 4	3133	768	769706	58.8	1290	4976	4.22
Chintholo 2	4521	1133	256390	23.1	3478	5564	5.16
Chitima 1	918	244	54364	53.2	430	1406	1.67
Chitima 3	0	0	0	0.0	0	0	0.00
Chitima 4	0	0	0	0.0	0	0	0.00
Chintholo 1	0	0	0	0.0	0	0	0.00
Chitima 2	376	90	32738	99.1	3	749	0.31
Kachembe	496	117	23066	64.4	177	815	0.71
Chintholo 3	277	69	23846	114.5	0	594	0.22
Chintholo 4	350	91	28289	99.8	1	698	0.37
Chipembere	2356	629	348615	51.5	1142	3570	1.67
Luenha	2111	536	203841	43.2	1200	3022	2.25
Subtotals	21016	5223	2502881	14.9	17882	24149	1.51
Totals	**22988**	**5366**	**4415036**	**18.7**	**18691**	**27286**	**1.39**

Table 21. Population estimates and statistics for Sheep and Goat south of Lake Cabora Bassa

Stratum	Estimate	No. Seen	Variance	% CI	Lower CL	Upper CL	Density (km^{-2})
West of Musengezi River (Magoe survey area)							
Magoe 1	104	14	5306	153.4	0	262	0.30
Magoe 2	0	0	0	0.0	0	0	0.00
Magoe 3	0	0	0	0.0	0	0	0.00
Magoe 4	2472	270	836000	83.7	404	4540	3.77
Magoe 5	0	0	0	0.0	0	0	0.00
Magoe 6	1338	97	939720	177.3	0	3710	3.41
Subtotals	3913	381	1781027	73.1	1051	6776	1.49
East of Musengezi River							
Mukumbura 1	988	234	60099	51.0	484	1492	0.81
Mukumbura 2	1290	307	114242	53.7	597	1982	1.57
Mphende	245	63	17723	113.4	0	523	0.33
Mukumbura 3	0	0	0	0.0	0	0	0.00
Mukumbura 4	1346	330	113009	52.5	640	2052	1.81
Chintholo 2	1792	449	94447	35.3	1159	2425	2.04
Chitima 1	1068	284	94125	60.1	426	1710	1.95
Chitima 3	57	14	2461	193.4	0	168	0.11
Chitima 4	29	7	578	186.4	0	82	0.05
Chintholo 1	0	0	0	0.0	0	0	0.00
Chitima 2	251	60	9152	78.6	54	448	0.21
Kachembe	449	106	16368	59.8	180	718	0.65
Chintholo 3	959	239	156189	84.6	148	1769	0.77
Chintholo 4	465	121	27370	73.8	122	808	0.49
Chipembere	2383	636	417441	55.8	1054	3711	1.68
Luenha	1689	429	160907	47.9	880	2499	1.80
Subtotals	13010	3279	1284109	17.2	10772	15249	0.93
Totals	**16924**	**3660**	**3065136**	**20.9**	**13383**	**20465**	**1.02**

Table 22. Population estimates and statistics for Donkey south of Lake Cabora Bassa

Stratum	Estimate	No. Seen	Variance	% CI	Lower CL	Upper CL	Density (km^{-2})
West of Musengezi River (Magoe survey area)							
Magoe 1	0	0	0	0.0	0	0	0.00
Magoe 2	0	0	0	0.0	0	0	0.00
Magoe 3	0	0	0	0.0	0	0	0.00
Magoe 4	0	0	0	0.0	0	0	0.00
Magoe 5	0	0	0	0.0	0	0	0.00
Magoe 6	0	0	0	0.0	0	0	0.00
Subtotals	0	0	0	0.0	0	0	0.00
East of Musengezi River							
Mukumbura 1	220	52	4043	59.5	89	350	0.18
Mukumbura 2	63	15	595	79.3	13	113	0.08
Mphende	16	4	173	176.4	0	43	0.02
Mukumbura 3	0	0	0	0.0	0	0	0.00
Mukumbura 4	33	8	431	133.7	0	76	0.04
Chintholo 2	116	29	1323	64.8	41	191	0.13
Chitima 1	192	51	10453	111.5	0	406	0.35
Chitima 3	4	1	13	195.7	0	12	0.008
Chitima 4	0	0	0	0.0	0	0	0.00
Chintholo 1	0	0	0	0.0	0	0	0.00
Chitima 2	75	18	1597	109.5	0	158	0.06
Kachembe	21	5	394	196.9	0	63	0.03
Chintholo 3	16	4	196	179.3	0	45	0.013
Chintholo 4	12	3	94	174.7	0	32	0.012
Chipembere	26	7	424	161.4	0	69	0.02
Luenha	0	0	0	0.0	0	0	0.00
Subtotals	793	197	19737	35.5	512	1074	0.06
Totals	**793**	**197**	**19737**	**35.5**	**512**	**1074**	**0.05**

Table 23. Population estimates and statistics for Domestic Pig south of Lake Cabora Bassa

Stratum	Estimate	No. Seen	Variance	% CI	Lower CL	Upper CL	Density (km^{-2})
West of Musengezi River (Magoe survey area)							
Magoe 1	0	0	0	0.0	0	0	0.00
Magoe 2	0	0	0	0.0	0	0	0.00
Magoe 3	0	0	0	0.0	0	0	0.00
Magoe 4	0	0	0	0.0	0	0	0.00
Magoe 5	0	0	0	0.0	0	0	0.00
Magoe 6	0	0	0	0.0	0	0	0.00
Subtotals	0	0	0	0.0	0	0	0.00
East of Musengezi River							
Mukumbura 1	0	0	0	0.0	0	0	0.00
Mukumbura 2	13	3	139	191.5	0	37	0.02
Mphende	0	0	0	0.0	0	0	0.00
Mukumbura 3	0	0	0	0.0	0	0	0.00
Mukumbura 4	114	28	1818	78.4	25	204	0.15
Chintholo 2	0	0	0	0.0	0	0	0.00
Chitima 1	11	3	81	166.9	0	30	0.02
Chitima 3	0	0	0	0.0	0	0	0.00
Chitima 4	0	0	0	0.0	0	0	0.00
Chintholo 1	0	0	0	0.0	0	0	0.00
Chitima 2	4	1	14	182.4	0	12	0.003
Kachembe	30	7	295	121.7	0	66	0.04
Chintholo 3	0	0	0	0.0	0	0	0.00
Chintholo 4	0	0	0	0.0	0	0	0.00
Chipembere	0	0	0	0.0	0	0	0.00
Luenha	0	0	0	0.0	0	0	0.00
Subtotals	172	42	2347	57.6	73	271	0.012
Totals	**172**	**42**	**2347**	**57.6**	**73**	**271**	**0.010**

Table 24. Population estimates and statistics for Ground hornbill south of Lake Cabora Bassa

Stratum	Estimate	No. Seen	Variance	% CI	Lower CL	Upper CL	Density (km^{-2})
West of Musengezi River (Magoe survey area)							
Magoe 1	0	0	0	0.0	0	0	0.00
Magoe 2	29	4	713	194.8	0	87	0.09
Magoe 3	0	0	0	0.0	0	0	0.00
Magoe 4	110	12	3540	122.5	0	244	0.17
Magoe 5	15	2	184	194.9	0	45	0.02
Magoe 6	0	0	0	0.0	0	0	0.00
Subtotals	154	18	4437	93.2	11	298	0.06
East of Musengezi River							
Mukumbura 1	8	2	26	123.5	0	19	0.007
Mukumbura 2	25	6	296	139.7	0	60	0.03
Mphende	0	0	0	0.0	0	0	0.00
Mukumbura 3	8	2	44	180.7	0	22	0.01
Mukumbura 4	20	5	330	187.1	0	59	0.03
Chintholo 2	20	5	138	121.4	0	44	0.02
Chitima 1	0	0	0	0.0	0	0	0.00
Chitima 3	16	4	200	193.2	0	48	0.03
Chitima 4	8	2	47	186.8	0	24	0.02
Chintholo 1	0	0	0	0.0	0	0	0.00
Chitima 2	0	0	0	0.0	0	0	0.00
Kachembe	13	3	125	184.9	0	36	0.02
Chintholo 3	12	3	110	178.9	0	34	0.01
Chintholo 4	19	5	111	114.0	0	41	0.02
Chipembere	15	4	60	106.5	0	31	0.01
Luenha	0	0	0	0.0	0	0	0.00
Subtotals	165	41	1489	46.2	89	241	0.01
Totals	**320**	**59**	**5926**	**49.7**	**161**	**478**	**0.02**

Table 25. Population estimates and statistics for Crocodile south of Lake Cabora Bassa

Stratum	Estimate	No. Seen	Variance	% CI	Lower CL	Upper CL	Density (km^{-2})
West of Musengezi River (Magoe survey area)							
Magoe 1	44	6	1770	206.7	0	136	0.13
Magoe 2	294	40	8416	67.0	97	491	0.86
Magoe 3	250	20	46617	239.4	0	850	1.85
Magoe 4	27	3	727	222.1	0	88	0.04
Magoe 5	0	0	0	0.0	0	0	0.00
Magoe 6	0	0	0	0.0	0	0	0.00
Subtotals	616	69	57531	95.3	29	1203	0.24
East of Musengezi River							
Mukumbura 1	114	27	1934	79.3	24	204	0.09
Mukumbura 2	8	2	31	136.1	0	20	0.01
Mphende	4	1	11	175.1	0	11	0.005
Mukumbura 3	0	0	0	0.0	0	0	0.00
Mukumbura 4	0	0	0	0.0	0	0	0.00
Chintholo 2	0	0	0	0.0	0	0	0.00
Chitima 1	0	0	0	0.0	0	0	0.00
Chitima 3	0	0	0	0.0	0	0	0.00
Chitima 4	0	0	0	0.0	0	0	0.00
Chintholo 1	0	0	0	0.0	0	0	0.00
Chitima 2	0	0	0	0.0	0	0	0.00
Kachembe	0	0	0	0.0	0	0	0.00
Chintholo 3	0	0	0	0.0	0	0	0.00
Chintholo 4	4	1	11	175.4	0	11	0.004
Chipembere	0	0	0	0.0	0	0	0.00
Luenha	0	0	0	0.0	0	0	0.00
Subtotals	130	31	1987	70.3	39	222	0.009
Totals	**746**	**100**	**59517**	**80.0**	**149**	**1343**	**0.05**

Appendix 1. Calibration of strip width

For each run (i.e. flight over the calibration numbers):

- Strip width (in meters) for one observer = 10 x (1 + Difference between outer and inner);
- Combined strip width (in meters) at flying height = Left strip width + right strip width; and
- Combined strip width at 300 ft agl[1] = Actual combined strip width x 300 / (Flying height)

[1] agl: above ground level

Cessna 206 N206CE. Flown at Songo on 18 October 2010.

Run no.	Left observer: Greg Nyaguse			Right observer: David Chipesi			Combined strip width (m) at flying height	Flying height agl (ft)	Combined strip width (m) when flying at 300 ft
	Outer marker	Inner marker	Strip width (m)	Outer marker	Inner marker	Strip width (m)			
1	36	10	270	34	9	260	530	290	548
2	-	15		32	9	240	-	350	-
3	28	8	210	27	9	190	400	240	500
4	40	16	250	34	11	240	490	280	525
5	40	9	320	39	9	310	630	360	525
6	-	9		37	11	270	-	290	-
7	30	8	230	39	13	270	500	310	484
8	-	8		40	15	260	-	340	-
9	40	10	310	36	11	260	570	320	534
10	40	10	310	36	10	270	580	350	497
11	36	7	300	28	8?		-	320	-
12	31	9	230	30	10	210	440	320	413
13	38	7	320	30	9	220	540	320	506
14	30	9	220	34	9	260	480	320	450
15	38	7	320	32	8	250	570	330	518
16	36	4	330	37	15	230	560	360	467
17	30	7	240	32	10	230	470	320	441
18	34	5	300	30	9	220	520	320	488
19	37	7	310	30	10	210	520	340	459
20	37	9	290	31	10	220	510	330	464
21	23	6	180	25	8	180	360	260	415
22	12	6?		30	9	220	-	290	-
23	30	7	240	27	9	190	430	300	430
24	23	4	200	28	9	200	400	290	414
25	30	6	250	27	9	190	440	300	440
26	26	6	210	23	7	170	380	290	393
27	27	9	190	-	-		-	290	-
28	20	7	140	27	7	210	350	300	350
29	28	8	210	21	6	160	370	280	396
30	21	4	180	27	9	190	370	300	370
31	24	7	180	23	6	180	360	260	415
32	23	6	180	25	7	190	370	250	444
Mean combined strip width (in meters) when flying at 300 feet agl =									**457.2**
Standard error of mean combined strip width as a percentage of the mean									**2.3**

Cessna 185 N9630H. Flown at Songo on 30 October 2010.

Run no.	Left observer: Greg Nyaguse			Right observer: David Chipesi			Combined strip width (m) at flying height	Flying height agl (ft)	Combined strip width (m) when flying at 300 ft
	Outer marker	Inner marker	Strip width (m)	Outer marker	Inner marker	Strip width (m)			
1	41	8	340	32	11	220	560	320	525
2	27	8	200	25	7	190	390	250	468
3	30	8	230	30	11	200	430	300	430
4	31	9	230	30	8	230	460	280	493
5	30	8	230	30	10	210	440	310	426
6	31	9	230	31	9	230	460	300	460
7	28	7	220	29	7	230	450	300	450
8	30	9	220	31	9	230	450	300	450
9	28	8	210	30	10	210	420	300	420
10	32	10	230	30	8	230	460	300	460
11	31	8	240				-	290	-
12	21	5	170	30	9	220	390	220	532
13	30	8	230	26	8	190	420	280	450
14	27	8	200	30	8	230	430	260	496
15	25	8	180	31	10	220	400	300	400
16	31	7	250	27	9	190	440	250	528
17	29	7	230	28	9	200	430	280	461
18	31	10	220	34	11	240	460	350	394
19	40	10	310	36	10	270	580	350	497
20	37	10	280	31	9	230	510	320	478
21	37	8	300	34	10	250	550	340	485
22	36	12	250	30	8	230	480	330	436
23	31	9	230	29	8	220	450	310	435
24	36	12	250	38	10	290	540	360	450
25	36	10	270	25	7	190	460	320	431
26	36	12	250	32	9	240	490	350	420
27				26	8	190	-	270	-
28	34	12	230	24	9	160	390	300	390
29	28	12	170	26	9	180	350	260	404
30	36	16	210	18	1	180	390	280	418
Mean combined strip width (in meters) when flying at 300 feet agl =									**453.1**
Standard error of mean combined strip width as a percentage of the mean									**1.7**

Appendix 2. Survey flight summary

Date	Time take off	Time land	Flight time (hours)	Duty
Cessna 206 N206CE				
15-Oct-10			3.20	Positioning - Nampula to Songo
16-Oct-10	15:13	15:44	0.52	Calibration
18-Oct-10	13:14	15:08	1.90	Calibration
19-Oct-10	7:55	12:16	4.35	Stratum Mukumbura 1, transects 27-8
19-Oct-10	14:35	16:38	2.05	Stratum Kachembe, transects 1-16
20-Oct-10	7:52	12:20	4.47	Stratum Mukumbura 1, transects 7-1; stratum Mphende, transects 21-4
20-Oct-10	14:32	16:36	2.07	Stratum Chitima 2, transects 1-11
21-Oct-10	7:34	11:49	4.25	Stratum Mukumbura 2, transects 29-1
21-Oct-10	14:30	16:42	2.20	Stratum Chitima 2, transects 12-24
22-Oct-10	7:33	11:29	3.93	Stratum Mukumbura 3, transects 1-21; stratum Mphende, transects 3-1
23-Oct-10	6:48	10:11	3.38	Stratum Mukumbura 4, transects 20-2
23-Oct-10	14:34	16:12	1.63	Stratum Chitima 2, transects 25-26; stratum Kachembe, transects 20-17
25-Oct-10	7:34	11:12	3.63	Stratum Chintholo 2, transects 1-26
25-Oct-10	14:28	16:42	2.23	Stratum Chitima 3, transects 1-11
26-Oct-10	7:34	11:10	3.60	Stratum Chintholo 4, transects 1-23
26-Oct-10	14:26	16:37	2.18	Stratum Chitima 4, transects 1-11
27-Oct-10	7:53	10:23	2.50	Stratum Chitima 1, transects 1-20
28-Oct-10			3.30	Positioning - Songo to Nampula
		Subtotal	**51.40**	
Cessna 185 N9630H				
29-Oct-10			1.5	Positioning - western Magoe to Songo
30-Oct-10	6:25	6:50	0.42	Calibration
30-Oct-10	7:10	8:05	0.92	Calibration
30-Oct-10	9:05	10:36	1.52	Stratum Chintholo 3, transects 9-14
30-Oct-10	14:33	16:10	1.62	Stratum Chintholo 3, transects 15-20
31-Oct-10	6:46	9:57	3.18	Stratum Chipembere, transects 15-27
31-Oct-10	14:33	16:19	1.77	Stratum Chintholo 3, transects 21-28
01-Nov-10	6:45	10:21	3.60	Stratum Chipembere, transects 1-14
01-Nov-10	14:31	16:41	2.17	Stratum Chintholo 3, transects 1-8
02-Nov-10	6:51	10:50	3.98	Stratum Luenha, transects 1-24
02-Nov-10	14:44	16:45	2.02	Stratum Chintholo 1, transects 3-14
03-Nov-10	6:40	10:02	3.37	Stratum Luenha, transects 25-43
03-Nov-10	14:38	16:50	2.20	Stratum Chintholo 1, transects 15-23
04-Nov-10			1.5	Positioning - Songo to western Magoe
		Subtotal	**29.75**	
		Total	**81.15**	

Appendix 3. Transect start and end points, and lengths

Degrees and decimal minutes; datum WGS84

Mukumbura 1
Number of transects : 27
Transect Bearing : 0.00 Degrees
Transect Spacing : 2.00 km

Transect # : 1A
Start Lat : S 15 : 44.085 Start Lon : E 31 : 36.869
Finish Lat : S 15 : 44.197 Finish Lon : E 31 : 36.869
Length : 0.21 km

Transect # : 1B
Start Lat : S 15 : 44.361 Start Lon : E 31 : 36.869
Finish Lat : S 15 : 57.360 Finish Lon : E 31 : 36.869
Length : 24.07 km

Transect # : 2
Start Lat : S 15 : 57.360 Start Lon : E 31 : 35.748
Finish Lat : S 15 : 42.596 Finish Lon : E 31 : 35.748
Length : 27.34 km

Transect # : 3
Start Lat : S 15 : 41.811 Start Lon : E 31 : 34.627
Finish Lat : S 15 : 57.360 Finish Lon : E 31 : 34.627
Length : 28.79 km

Transect # : 4A
Start Lat : S 15 : 57.360 Start Lon : E 31 : 33.507
Finish Lat : S 15 : 43.584 Finish Lon : E 31 : 33.507
Length : 25.51 km

Transect # : 4B
Start Lat : S 15 : 43.137 Start Lon : E 31 : 33.507
Finish Lat : S 15 : 41.519 Finish Lon : E 31 : 33.507
Length : 3.00 km

Transect # : 5
Start Lat : S 15 : 43.150 Start Lon : E 31 : 32.386
Finish Lat : S 15 : 57.360 Finish Lon : E 31 : 32.386
Length : 26.31 km

Transect # : 6
Start Lat : S 15 : 57.360 Start Lon : E 31 : 31.265
Finish Lat : S 15 : 41.483 Finish Lon : E 31 : 31.265
Length : 29.40 km

Transect # : 7A
Start Lat : S 15 : 41.276 Start Lon : E 31 : 30.144
Finish Lat : S 15 : 41.288 Finish Lon : E 31 : 30.144
Length : 0.02 km

Transect # : 7B
Start Lat : S 15 : 42.292 Start Lon : E 31 : 30.144
Finish Lat : S 15 : 42.745 Finish Lon : E 31 : 30.144
Length : 0.84 km

Transect # : 7C
Start Lat : S 15 : 43.685 Start Lon : E 31 : 30.144
Finish Lat : S 15 : 57.360 Finish Lon : E 31 : 30.144
Length : 25.32 km

Transect # : 8
Start Lat : S 15 : 57.360 Start Lon : E 31 : 29.023
Finish Lat : S 15 : 43.541 Finish Lon : E 31 : 29.023
Length : 25.59 km

Transect # : 9
Start Lat : S 15 : 42.491 Start Lon : E 31 : 27.902
Finish Lat : S 15 : 57.360 Finish Lon : E 31 : 27.902
Length : 27.54 km

Transect # : 10
Start Lat : S 15 : 57.360 Start Lon : E 31 : 26.781
Finish Lat : S 15 : 41.876 Finish Lon : E 31 : 26.781
Length : 28.67 km

Transect # : 11
Start Lat : S 15 : 42.355 Start Lon : E 31 : 25.660
Finish Lat : S 15 : 57.360 Finish Lon : E 31 : 25.660
Length : 27.79 km

Transect # : 12
Start Lat : S 15 : 57.360 Start Lon : E 31 : 24.540
Finish Lat : S 15 : 43.003 Finish Lon : E 31 : 24.540
Length : 26.59 km

Transect # : 13
Start Lat : S 15 : 42.601 Start Lon : E 31 : 23.419
Finish Lat : S 15 : 57.360 Finish Lon : E 31 : 23.419
Length : 27.33 km

Transect # : 14
Start Lat : S 15 : 57.360 Start Lon : E 31 : 22.298
Finish Lat : S 15 : 42.966 Finish Lon : E 31 : 22.298
Length : 26.65 km

Transect # : 15
Start Lat : S 15 : 42.408 Start Lon : E 31 : 21.177
Finish Lat : S 15 : 57.360 Finish Lon : E 31 : 21.177
Length : 27.69 km

Transect # : 16A
Start Lat : S 15 : 57.360 Start Lon : E 31 : 20.056
Finish Lat : S 15 : 43.490 Finish Lon : E 31 : 20.056
Length : 25.69 km

Transect # : 16B
Start Lat : S 15 : 43.015 Start Lon : E 31 : 20.056
Finish Lat : S 15 : 40.297 Finish Lon : E 31 : 20.056
Length : 5.03 km

Transect # : 17A
Start Lat : S 15 : 41.683 Start Lon : E 31 : 18.935
Finish Lat : S 15 : 41.925 Finish Lon : E 31 : 18.935
Length : 0.45 km

Transect # : 17B
Start Lat : S 15 : 44.818 Start Lon : E 31 : 18.935
Finish Lat : S 15 : 44.911 Finish Lon : E 31 : 18.935
Length : 0.17 km

Transect # : 17C
Start Lat : S 15 : 45.353 Start Lon : E 31 : 18.935
Finish Lat : S 15 : 57.360 Finish Lon : E 31 : 18.935
Length : 22.23 km

Transect # : 18
Start Lat : S 15 : 57.360 Start Lon : E 31 : 17.814
Finish Lat : S 15 : 43.484 Finish Lon : E 31 : 17.814
Length : 25.70 km

Transect # : 19
Start Lat : S 15 : 42.752 Start Lon : E 31 : 16.693
Finish Lat : S 15 : 57.360 Finish Lon : E 31 : 16.693
Length : 27.05 km

Transect # : 20A
Start Lat : S 15 : 57.360 Start Lon : E 31 : 15.573
Finish Lat : S 15 : 46.462 Finish Lon : E 31 : 15.573
Length : 20.18 km

Transect # : 20B
Start Lat : S 15 : 44.489 Start Lon : E 31 : 15.573
Finish Lat : S 15 : 43.468 Finish Lon : E 31 : 15.573
Length : 1.89 km

Transect # : 21A
Start Lat : S 15 : 48.387 Start Lon : E 31 : 14.452
Finish Lat : S 15 : 48.559 Finish Lon : E 31 : 14.452
Length : 0.32 km

Transect # : 21B
Start Lat : S 15 : 48.805 Start Lon : E 31 : 14.452
Finish Lat : S 15 : 49.051 Finish Lon : E 31 : 14.452
Length : 0.46 km

Transect # : 21C
Start Lat : S 15 : 49.580 Start Lon : E 31 : 14.452
Finish Lat : S 15 : 49.643 Finish Lon : E 31 : 14.452
Length : 0.12 km

Transect # : 21D
Start Lat : S 15 : 50.278 Start Lon : E 31 : 14.452
Finish Lat : S 15 : 57.360 Finish Lon : E 31 : 14.452
Length : 13.11 km

Transect # : 22
Start Lat : S 15 : 57.360 Start Lon : E 31 : 13.331
Finish Lat : S 15 : 50.003 Finish Lon : E 31 : 13.331
Length : 13.62 km

Transect # : 23A
Start Lat : S 15 : 49.008 Start Lon : E 31 : 12.210
Finish Lat : S 15 : 49.190 Finish Lon : E 31 : 12.210
Length : 0.34 km

Transect # : 23B
Start Lat : S 15 : 49.468 Start Lon : E 31 : 12.210
Finish Lat : S 15 : 49.593 Finish Lon : E 31 : 12.210
Length : 0.23 km

Transect # : 23C
Start Lat : S 15 : 50.154 Start Lon : E 31 : 12.210
Finish Lat : S 15 : 57.360 Finish Lon : E 31 : 12.210
Length : 13.35 km

Transect # : 24
Start Lat : S 15 : 57.360 Start Lon : E 31 : 11.089
Finish Lat : S 15 : 51.205 Finish Lon : E 31 : 11.089
Length : 11.40 km

Transect # : 25
Start Lat : S 15 : 52.229 Start Lon : E 31 : 9.968
Finish Lat : S 15 : 57.360 Finish Lon : E 31 : 9.968
Length : 9.50 km

Transect # : 26A
Start Lat : S 15 : 57.360 Start Lon : E 31 : 8.847
Finish Lat : S 15 : 54.952 Finish Lon : E 31 : 8.847
Length : 4.46 km

Transect # : 26B
Start Lat : S 15 : 54.477 Start Lon : E 31 : 8.847
Finish Lat : S 15 : 54.264 Finish Lon : E 31 : 8.847
Length : 0.39 km

Transect # : 26C
Start Lat : S 15 : 54.181 Start Lon : E 31 : 8.847
Finish Lat : S 15 : 54.065 Finish Lon : E 31 : 8.847
Length : 0.21 km

Transect # : 27
Start Lat : S 15 : 57.197 Start Lon : E 31 : 7.727
Finish Lat : S 15 : 57.360 Finish Lon : E 31 : 7.727
Length : 0.30 km

Mukumbura 2
Number of transects : 29
Transect Bearing : 0.00 Degrees
Transect Spacing : 2.00 km

Transect # : 1
Start Lat : S 15 : 57.360 Start Lon : E 31 : 37.574
Finish Lat : S 16 : 10.810 Finish Lon : E 31 : 37.574
Length : 24.91 km

Transect # : 2
Start Lat : S 16 : 11.104 Start Lon : E 31 : 36.452
Finish Lat : S 15 : 57.360 Finish Lon : E 31 : 36.452
Length : 25.45 km

Transect # : 3
Start Lat : S 15 : 57.360 Start Lon : E 31 : 35.330
Finish Lat : S 16 : 10.757 Finish Lon : E 31 : 35.330
Length : 24.81 km

Transect # : 4
Start Lat : S 16 : 10.867 Start Lon : E 31 : 34.208
Finish Lat : S 15 : 57.360 Finish Lon : E 31 : 34.208
Length : 25.01 km

Transect # : 5
Start Lat : S 15 : 57.360 Start Lon : E 31 : 33.085
Finish Lat : S 16 : 10.526 Finish Lon : E 31 : 33.085
Length : 24.38 km

Transect # : 6
Start Lat : S 16 : 10.196 Start Lon : E 31 : 31.963
Finish Lat : S 15 : 57.360 Finish Lon : E 31 : 31.963
Length : 23.77 km

Transect # : 7
Start Lat : S 15 : 57.360 Start Lon : E 31 : 30.841
Finish Lat : S 16 : 9.848 Finish Lon : E 31 : 30.841
Length : 23.13 km

Transect # : 8
Start Lat : S 16 : 9.996 Start Lon : E 31 : 29.719
Finish Lat : S 15 : 57.360 Finish Lon : E 31 : 29.719
Length : 23.40 km

Transect # : 9
Start Lat : S 15 : 57.360 Start Lon : E 31 : 28.597
Finish Lat : S 16 : 9.481 Finish Lon : E 31 : 28.597
Length : 22.45 km

Transect # : 10
Start Lat : S 16 : 9.547 Start Lon : E 31 : 27.475
Finish Lat : S 15 : 57.360 Finish Lon : E 31 : 27.475
Length : 22.57 km

Transect # : 11
Start Lat : S 15 : 57.360 Start Lon : E 31 : 26.353
Finish Lat : S 16 : 9.357 Finish Lon : E 31 : 26.353
Length : 22.22 km

Transect # : 12
Start Lat : S 16 : 8.095 Start Lon : E 31 : 25.231
Finish Lat : S 15 : 57.360 Finish Lon : E 31 : 25.231
Length : 19.88 km

Transect # : 13A
Start Lat : S 15 : 57.360 Start Lon : E 31 : 24.109
Finish Lat : S 16 : 7.312 Finish Lon : E 31 : 24.109
Length : 18.43 km

Transect # : 13B
Start Lat : S 16 : 7.802 Start Lon : E 31 : 24.109
Finish Lat : S 16 : 8.075 Finish Lon : E 31 : 24.109
Length : 0.51 km

Transect # : 14
Start Lat : S 16 : 6.144 Start Lon : E 31 : 22.987
Finish Lat : S 15 : 57.360 Finish Lon : E 31 : 22.987
Length : 16.27 km

Transect # : 15
Start Lat : S 15 : 57.360 Start Lon : E 31 : 21.865
Finish Lat : S 16 : 5.240 Finish Lon : E 31 : 21.865
Length : 14.59 km

Transect # : 16
Start Lat : S 16 : 4.430 Start Lon : E 31 : 20.743
Finish Lat : S 15 : 57.360 Finish Lon : E 31 : 20.743
Length : 13.09 km

Transect # : 17
Start Lat : S 15 : 57.360 Start Lon : E 31 : 19.620
Finish Lat : S 16 : 2.475 Finish Lon : E 31 : 19.620
Length : 9.47 km

Transect # : 18
Start Lat : S 16 : 1.175 Start Lon : E 31 : 18.498
Finish Lat : S 15 : 57.360 Finish Lon : E 31 : 18.498
Length : 7.07 km

Transect # : 19
Start Lat : S 15 : 57.360 Start Lon : E 31 : 17.376
Finish Lat : S 16 : 1.166 Finish Lon : E 31 : 17.376
Length : 7.05 km

Transect # : 20
Start Lat : S 16 : 0.541 Start Lon : E 31 : 16.254
Finish Lat : S 15 : 57.360 Finish Lon : E 31 : 16.254
Length : 5.89 km

Transect # : 21
Start Lat : S 15 : 57.360 Start Lon : E 31 : 15.132
Finish Lat : S 16 : 0.739 Finish Lon : E 31 : 15.132
Length : 6.26 km

Transect # : 22
Start Lat : S 16 : 0.246 Start Lon : E 31 : 14.010
Finish Lat : S 15 : 57.360 Finish Lon : E 31 : 14.010
Length : 5.34 km

Transect # : 23
Start Lat : S 15 : 57.360 Start Lon : E 31 : 12.888
Finish Lat : S 16 : 0.531 Finish Lon : E 31 : 12.888
Length : 5.87 km

Transect # : 24
Start Lat : S 16 : 0.347 Start Lon : E 31 : 11.766
Finish Lat : S 15 : 57.360 Finish Lon : E 31 : 11.766
Length : 5.53 km

Transect # : 25
Start Lat : S 15 : 57.360 Start Lon : E 31 : 10.644
Finish Lat : S 15 : 59.340 Finish Lon : E 31 : 10.644
Length : 3.67 km

Transect # : 26
Start Lat : S 15 : 59.368 Start Lon : E 31 : 9.522
Finish Lat : S 15 : 57.360 Finish Lon : E 31 : 9.522
Length : 3.72 km

Transect # : 27
Start Lat : S 15 : 57.360 Start Lon : E 31 : 8.400
Finish Lat : S 15 : 59.346 Finish Lon : E 31 : 8.400
Length : 3.68 km

Transect # : 28
Start Lat : S 15 : 59.673 Start Lon : E 31 : 7.277
Finish Lat : S 15 : 57.087 Finish Lon : E 31 : 7.277
Length : 4.79 km

Transect # : 29
Start Lat : S 15 : 56.102 Start Lon : E 31 : 6.155
Finish Lat : S 15 : 59.702 Finish Lon : E 31 : 6.155
Length : 6.67 km

Mphende
Number of transects : 21
Transect Bearing : 0.00 Degrees
Transect Spacing : 2.00 km

Transect # : 1
Start Lat : S 15 : 44.995 Start Lon : E 32 : 0.506
Finish Lat : S 15 : 53.760 Finish Lon : E 32 : 0.506
Length : 16.23 km

Transect # : 2
Start Lat : S 15 : 53.760 Start Lon : E 31 : 59.384
Finish Lat : S 15 : 45.752 Finish Lon : E 31 : 59.384
Length : 14.77 km

Transect # : 3
Start Lat : S 15 : 46.319 Start Lon : E 31 : 58.263
Finish Lat : S 15 : 53.379 Finish Lon : E 31 : 58.263
Length : 13.02 km

Transect # : 4
Start Lat : S 15 : 53.760 Start Lon : E 31 : 57.142
Finish Lat : S 15 : 43.828 Finish Lon : E 31 : 57.142
Length : 18.39 km

Transect # : 5
Start Lat : S 15 : 43.959 Start Lon : E 31 : 56.021
Finish Lat : S 15 : 53.760 Finish Lon : E 31 : 56.021
Length : 18.15 km

Transect # : 6
Start Lat : S 15 : 53.760 Start Lon : E 31 : 54.900
Finish Lat : S 15 : 43.624 Finish Lon : E 31 : 54.900
Length : 18.77 km

Transect # : 7A
Start Lat : S 15 : 42.540 Start Lon : E 31 : 53.779
Finish Lat : S 15 : 42.695 Finish Lon : E 31 : 53.779
Length : 0.29 km

Transect # : 7B
Start Lat : S 15 : 42.920 Start Lon : E 31 : 53.779
Finish Lat : S 15 : 53.760 Finish Lon : E 31 : 53.779
Length : 20.07 km

Transect # : 8
Start Lat : S 15 : 53.760 Start Lon : E 31 : 52.657
Finish Lat : S 15 : 42.639 Finish Lon : E 31 : 52.657
Length : 20.60 km

Transect # : 9
Start Lat : S 15 : 43.347 Start Lon : E 31 : 51.536
Finish Lat : S 15 : 53.760 Finish Lon : E 31 : 51.536
Length : 19.28 km

Transect # : 10
Start Lat : S 15 : 53.760 Start Lon : E 31 : 50.415
Finish Lat : S 15 : 42.987 Finish Lon : E 31 : 50.415
Length : 19.95 km

Transect # : 11A
Start Lat : S 15 : 42.871 Start Lon : E 31 : 49.294
Finish Lat : S 15 : 43.208 Finish Lon : E 31 : 49.294
Length : 0.62 km

Transect # : 11B
Start Lat : S 15 : 43.574 Start Lon : E 31 : 49.294
Finish Lat : S 15 : 53.760 Finish Lon : E 31 : 49.294
Length : 18.86 km

Transect # : 12A
Start Lat : S 15 : 53.760 Start Lon : E 31 : 48.173
Finish Lat : S 15 : 44.181 Finish Lon : E 31 : 48.173
Length : 17.74 km

Transect # : 12B
Start Lat : S 15 : 44.086 Start Lon : E 31 : 48.173
Finish Lat : S 15 : 43.935 Finish Lon : E 31 : 48.173
Length : 0.28 km

Transect # : 13
Start Lat : S 15 : 43.853 Start Lon : E 31 : 47.052
Finish Lat : S 15 : 53.760 Finish Lon : E 31 : 47.052
Length : 18.35 km

Transect # : 14
Start Lat : S 15 : 53.760 Start Lon : E 31 : 45.930
Finish Lat : S 15 : 44.319 Finish Lon : E 31 : 45.930
Length : 17.48 km

Transect # : 15
Start Lat : S 15 : 44.974 Start Lon : E 31 : 44.809
Finish Lat : S 15 : 53.760 Finish Lon : E 31 : 44.809
Length : 16.27 km

Transect # : 16
Start Lat : S 15 : 53.760 Start Lon : E 31 : 43.688
Finish Lat : S 15 : 45.325 Finish Lon : E 31 : 43.688
Length : 15.62 km

Transect # : 17
Start Lat : S 15 : 45.008 Start Lon : E 31 : 42.567
Finish Lat : S 15 : 53.760 Finish Lon : E 31 : 42.567
Length : 16.21 km

Transect # : 18
Start Lat : S 15 : 53.760 Start Lon : E 31 : 41.446
Finish Lat : S 15 : 44.544 Finish Lon : E 31 : 41.446
Length : 17.07 km

Transect # : 19
Start Lat : S 15 : 44.078 Start Lon : E 31 : 40.325
Finish Lat : S 15 : 53.760 Finish Lon : E 31 : 40.325
Length : 17.93 km

Transect # : 20
Start Lat : S 15 : 53.760 Start Lon : E 31 : 39.203
Finish Lat : S 15 : 44.425 Finish Lon : E 31 : 39.203
Length : 17.29 km

Transect # : 21
Start Lat : S 15 : 44.011 Start Lon : E 31 : 38.082
Finish Lat : S 15 : 53.760 Finish Lon : E 31 : 38.082
Length : 18.05 km

Mukumbura 3

Number of transects : 21
Transect Bearing : 0.00 Degrees
Transect Spacing : 2.00 km

Transect # : 1
Start Lat : S 15 : 53.760 Start Lon : E 32 : 0.572
Finish Lat : S 16 : 4.200 Finish Lon : E 32 : 0.572
Length : 19.33 km

Transect # : 2
Start Lat : S 16 : 4.200 Start Lon : E 31 : 59.450
Finish Lat : S 15 : 53.760 Finish Lon : E 31 : 59.450
Length : 19.33 km

Transect # : 3
Start Lat : S 15 : 53.760 Start Lon : E 31 : 58.327
Finish Lat : S 16 : 4.200 Finish Lon : E 31 : 58.327
Length : 19.33 km

Transect # : 4
Start Lat : S 16 : 4.200 Start Lon : E 31 : 57.205
Finish Lat : S 15 : 53.760 Finish Lon : E 31 : 57.205
Length : 19.33 km

Transect # : 5
Start Lat : S 15 : 53.760 Start Lon : E 31 : 56.083
Finish Lat : S 16 : 4.200 Finish Lon : E 31 : 56.083
Length : 19.33 km

Transect # : 6
Start Lat : S 16 : 4.200 Start Lon : E 31 : 54.961
Finish Lat : S 15 : 53.760 Finish Lon : E 31 : 54.961
Length : 19.33 km

Transect # : 7
Start Lat : S 15 : 53.760 Start Lon : E 31 : 53.839
Finish Lat : S 16 : 4.200 Finish Lon : E 31 : 53.839
Length : 19.33 km

Transect # : 8
Start Lat : S 16 : 4.200 Start Lon : E 31 : 52.717
Finish Lat : S 15 : 53.760 Finish Lon : E 31 : 52.717
Length : 19.33 km

Transect # : 9
Start Lat : S 15 : 53.760 Start Lon : E 31 : 51.594
Finish Lat : S 16 : 4.200 Finish Lon : E 31 : 51.594
Length : 19.33 km

Transect # : 10
Start Lat : S 16 : 4.200 Start Lon : E 31 : 50.472
Finish Lat : S 15 : 53.760 Finish Lon : E 31 : 50.472
Length : 19.33 km

Transect # : 11
Start Lat : S 15 : 53.760 Start Lon : E 31 : 49.350
Finish Lat : S 16 : 4.200 Finish Lon : E 31 : 49.350
Length : 19.33 km

Transect # : 12
Start Lat : S 16 : 4.200 Start Lon : E 31 : 48.228
Finish Lat : S 15 : 53.760 Finish Lon : E 31 : 48.228
Length : 19.33 km

Transect # : 13
Start Lat : S 15 : 53.760 Start Lon : E 31 : 47.106
Finish Lat : S 16 : 4.200 Finish Lon : E 31 : 47.106
Length : 19.33 km

Transect # : 14
Start Lat : S 16 : 4.200 Start Lon : E 31 : 45.983
Finish Lat : S 15 : 53.760 Finish Lon : E 31 : 45.983
Length : 19.33 km

Transect # : 15
Start Lat : S 15 : 53.760 Start Lon : E 31 : 44.861
Finish Lat : S 16 : 4.200 Finish Lon : E 31 : 44.861
Length : 19.33 km

Transect # : 16
Start Lat : S 16 : 4.200 Start Lon : E 31 : 43.739
Finish Lat : S 15 : 53.760 Finish Lon : E 31 : 43.739
Length : 19.33 km

Transect # : 17
Start Lat : S 15 : 53.760 Start Lon : E 31 : 42.617
Finish Lat : S 16 : 4.200 Finish Lon : E 31 : 42.617
Length : 19.33 km

Transect # : 18
Start Lat : S 16 : 4.200 Start Lon : E 31 : 41.495
Finish Lat : S 15 : 53.760 Finish Lon : E 31 : 41.495
Length : 19.33 km

Transect # : 19
Start Lat : S 15 : 53.760 Start Lon : E 31 : 40.373
Finish Lat : S 16 : 4.200 Finish Lon : E 31 : 40.373
Length : 19.33 km

Transect # : 20
Start Lat : S 16 : 4.200 Start Lon : E 31 : 39.250
Finish Lat : S 15 : 53.760 Finish Lon : E 31 : 39.250
Length : 19.33 km

Transect # : 21
Start Lat : S 15 : 53.760 Start Lon : E 31 : 38.128
Finish Lat : S 16 : 4.200 Finish Lon : E 31 : 38.128
Length : 19.33 km

Mukumbura 4
Number of transects : 20
Transect Bearing : 0.00 Degrees
Transect Spacing : 2.00 km

Transect # : 1
Start Lat : S 16 : 4.200 Start Lon : E 32 : 0.188
Finish Lat : S 16 : 15.000 Finish Lon : E 32 : 0.188
Length : 20.00 km – Not

Transect # : 2
Start Lat : S 16 : 15.000 Start Lon : E 31 : 59.065
Finish Lat : S 16 : 4.200 Finish Lon : E 31 : 59.065
Length : 20.00 km

Transect # : 3
Start Lat : S 16 : 4.200 Start Lon : E 31 : 57.942
Finish Lat : S 16 : 15.000 Finish Lon : E 31 : 57.942
Length : 20.00 km

Transect # : 4
Start Lat : S 16 : 15.000 Start Lon : E 31 : 56.819
Finish Lat : S 16 : 4.200 Finish Lon : E 31 : 56.819
Length : 20.00 km

Transect # : 5
Start Lat : S 16 : 4.200 Start Lon : E 31 : 55.696
Finish Lat : S 16 : 15.000 Finish Lon : E 31 : 55.696
Length : 20.00 km

Transect # : 6
Start Lat : S 16 : 15.000 Start Lon : E 31 : 54.573
Finish Lat : S 16 : 4.200 Finish Lon : E 31 : 54.573
Length : 20.00 km

Transect # : 7
Start Lat : S 16 : 4.200 Start Lon : E 31 : 53.450
Finish Lat : S 16 : 15.000 Finish Lon : E 31 : 53.450
Length : 20.00 km

Transect # : 8
Start Lat : S 16 : 15.000 Start Lon : E 31 : 52.326
Finish Lat : S 16 : 4.200 Finish Lon : E 31 : 52.326
Length : 20.00 km

Transect # : 9
Start Lat : S 16 : 4.200 Start Lon : E 31 : 51.203
Finish Lat : S 16 : 15.000 Finish Lon : E 31 : 51.203
Length : 20.00 km

Transect # : 10
Start Lat : S 16 : 15.000 Start Lon : E 31 : 50.080
Finish Lat : S 16 : 4.200 Finish Lon : E 31 : 50.080
Length : 20.00 km

Transect # : 11
Start Lat : S 16 : 4.200 Start Lon : E 31 : 48.957
Finish Lat : S 16 : 15.000 Finish Lon : E 31 : 48.957
Length : 20.00 km

Transect # : 12
Start Lat : S 16 : 15.000 Start Lon : E 31 : 47.834
Finish Lat : S 16 : 4.200 Finish Lon : E 31 : 47.834
Length : 20.00 km

Transect # : 13
Start Lat : S 16 : 4.200 Start Lon : E 31 : 46.711
Finish Lat : S 16 : 14.333 Finish Lon : E 31 : 46.711
Length : 18.76 km

Transect # : 14
Start Lat : S 16 : 13.790 Start Lon : E 31 : 45.587
Finish Lat : S 16 : 4.200 Finish Lon : E 31 : 45.587
Length : 17.76 km

Transect # : 15
Start Lat : S 16 : 4.200 Start Lon : E 31 : 44.464
Finish Lat : S 16 : 13.377 Finish Lon : E 31 : 44.464
Length : 17.00 km

Transect # : 16
Start Lat : S 16 : 12.411 Start Lon : E 31 : 43.341
Finish Lat : S 16 : 4.200 Finish Lon : E 31 : 43.341
Length : 15.21 km

Transect # : 17
Start Lat : S 16 : 4.200 Start Lon : E 31 : 42.218
Finish Lat : S 16 : 11.983 Finish Lon : E 31 : 42.218
Length : 14.41 km

Transect # : 18
Start Lat : S 16 : 11.829 Start Lon : E 31 : 41.095
Finish Lat : S 16 : 4.200 Finish Lon : E 31 : 41.095
Length : 14.13 km

Transect # : 19
Start Lat : S 16 : 4.200 Start Lon : E 31 : 39.972
Finish Lat : S 16 : 11.443 Finish Lon : E 31 : 39.972
Length : 13.41 km

Transect # : 20
Start Lat : S 16 : 11.661 Start Lon : E 31 : 38.848
Finish Lat : S 16 : 4.200 Finish Lon : E 31 : 38.848
Length : 13.82 km

Chintholo 2
Number of transects : 26
Transect Bearing : 0.00 Degrees
Transect Spacing : 2.00 km

Transect # : 1
Start Lat : S 16 : 15.000 Start Lon : E 32 : 16.116
Finish Lat : S 16 : 25.972 Finish Lon : E 32 : 16.116
Length : 20.32 km

Transect # : 2
Start Lat : S 16 : 26.034 Start Lon : E 32 : 14.992
Finish Lat : S 16 : 15.000 Finish Lon : E 32 : 14.992
Length : 20.43 km

Transect # : 3
Start Lat : S 16 : 15.000 Start Lon : E 32 : 13.868
Finish Lat : S 16 : 26.092 Finish Lon : E 32 : 13.868
Length : 20.54 km

Transect # : 4
Start Lat : S 16 : 26.149 Start Lon : E 32 : 12.744
Finish Lat : S 16 : 15.000 Finish Lon : E 32 : 12.744
Length : 20.65 km

Transect # : 5
Start Lat : S 16 : 15.000 Start Lon : E 32 : 11.621
Finish Lat : S 16 : 25.408 Finish Lon : E 32 : 11.621
Length : 19.19 km

Transect # : 6
Start Lat : S 16 : 25.268 Start Lon : E 32 : 10.497
Finish Lat : S 16 : 15.000 Finish Lon : E 32 : 10.497
Length : 18.93 km

Transect # : 7
Start Lat : S 16 : 15.000 Start Lon : E 32 : 9.373
Finish Lat : S 16 : 24.869 Finish Lon : E 32 : 9.373
Length : 18.20 km

Transect # : 8
Start Lat : S 16 : 24.909 Start Lon : E 32 : 8.249
Finish Lat : S 16 : 15.000 Finish Lon : E 32 : 8.249
Length : 18.27 km

Transect # : 9
Start Lat : S 16 : 15.000 Start Lon : E 32 : 7.125
Finish Lat : S 16 : 26.148 Finish Lon : E 32 : 7.125
Length : 20.55 km

Transect # : 10
Start Lat : S 16 : 26.188 Start Lon : E 32 : 6.001
Finish Lat : S 16 : 15.000 Finish Lon : E 32 : 6.001
Length : 20.63 km

Transect # : 11
Start Lat : S 16 : 15.000 Start Lon : E 32 : 4.877
Finish Lat : S 16 : 25.468 Finish Lon : E 32 : 4.877
Length : 19.30 km

Transect # : 12
Start Lat : S 16 : 25.208 Start Lon : E 32 : 3.753
Finish Lat : S 16 : 15.000 Finish Lon : E 32 : 3.753
Length : 18.82 km

Transect # : 13
Start Lat : S 16 : 15.000 Start Lon : E 32 : 2.630
Finish Lat : S 16 : 25.089 Finish Lon : E 32 : 2.630
Length : 18.60 km

Transect # : 14
Start Lat : S 16 : 24.669 Start Lon : E 32 : 1.506
Finish Lat : S 16 : 15.000 Finish Lon : E 32 : 1.506
Length : 17.83 km

Transect # : 15
Start Lat : S 16 : 15.000 Start Lon : E 32 : 0.382
Finish Lat : S 16 : 25.109 Finish Lon : E 32 : 0.382
Length : 18.64 km

Transect # : 16
Start Lat : S 16 : 24.909 Start Lon : E 31 : 59.258
Finish Lat : S 16 : 15.000 Finish Lon : E 31 : 59.258
Length : 18.27 km

Transect # : 17
Start Lat : S 16 : 15.000 Start Lon : E 31 : 58.134
Finish Lat : S 16 : 25.459 Finish Lon : E 31 : 58.134
Length : 19.37 km

Transect # : 18
Start Lat : S 16 : 25.175 Start Lon : E 31 : 57.010
Finish Lat : S 16 : 15.000 Finish Lon : E 31 : 57.010
Length : 18.84 km

Transect # : 19
Start Lat : S 16 : 15.000 Start Lon : E 31 : 55.887
Finish Lat : S 16 : 24.870 Finish Lon : E 31 : 55.887
Length : 18.28 km

Transect # : 20
Start Lat : S 16 : 24.494 Start Lon : E 31 : 54.763
Finish Lat : S 16 : 15.000 Finish Lon : E 31 : 54.763
Length : 17.58 km

Transect # : 21
Start Lat : S 16 : 15.000 Start Lon : E 31 : 53.639
Finish Lat : S 16 : 20.253 Finish Lon : E 31 : 53.639
Length : 9.73 km

Transect # : 22
Start Lat : S 16 : 19.569 Start Lon : E 31 : 52.515
Finish Lat : S 16 : 15.000 Finish Lon : E 31 : 52.515
Length : 8.46 km

Transect # : 23
Start Lat : S 16 : 15.000 Start Lon : E 31 : 51.391
Finish Lat : S 16 : 18.860 Finish Lon : E 31 : 51.391
Length : 7.15 km

Transect # : 24
Start Lat : S 16 : 18.256 Start Lon : E 31 : 50.267
Finish Lat : S 16 : 15.000 Finish Lon : E 31 : 50.267
Length : 6.03 km

Transect # : 25A
Start Lat : S 16 : 15.000 Start Lon : E 31 : 49.143
Finish Lat : S 16 : 16.859 Finish Lon : E 31 : 49.143
Length : 3.44 km

Transect # : 25B
Start Lat : S 16 : 17.227 Start Lon : E 31 : 49.143
Finish Lat : S 16 : 17.416 Finish Lon : E 31 : 49.143
Length : 0.35 km

Transect # : 26
Start Lat : S 16 : 16.072 Start Lon : E 31 : 48.020
Finish Lat : S 16 : 15.000 Finish Lon : E 31 : 48.020
Length : 1.99 km

Chitima 1
Number of transects : 20
Transect Bearing : 0.00 Degrees
Transect Spacing : 2.00 km

Transect # : 1
Start Lat : S 15 : 41.005 Start Lon : E 32 : 22.744
Finish Lat : S 15 : 51.600 Finish Lon : E 32 : 22.744
Length : 19.62 km

Transect # : 2
Start Lat : S 15 : 51.600 Start Lon : E 32 : 21.623
Finish Lat : S 15 : 41.459 Finish Lon : E 32 : 21.623
Length : 18.78 km

Transect # : 3
Start Lat : S 15 : 41.538 Start Lon : E 32 : 20.502
Finish Lat : S 15 : 51.600 Finish Lon : E 32 : 20.502
Length : 18.63 km

Transect # : 4
Start Lat : S 15 : 51.600 Start Lon : E 32 : 19.381
Finish Lat : S 15 : 43.282 Finish Lon : E 32 : 19.381
Length : 15.40 km

Transect # : 5
Start Lat : S 15 : 42.634 Start Lon : E 32 : 18.260
Finish Lat : S 15 : 51.600 Finish Lon : E 32 : 18.260
Length : 16.60 km

Transect # : 6A
Start Lat : S 15 : 51.600 Start Lon : E 32 : 17.138
Finish Lat : S 15 : 42.555 Finish Lon : E 32 : 17.138
Length : 16.75 km

Transect # : 6B
Start Lat : S 15 : 42.525 Start Lon : E 32 : 17.138
Finish Lat : S 15 : 42.395 Finish Lon : E 32 : 17.138
Length : 0.24 km

Transect # : 6C
Start Lat : S 15 : 42.353 Start Lon : E 32 : 17.138
Finish Lat : S 15 : 42.034 Finish Lon : E 32 : 17.138
Length : 0.59 km

Transect # : 7
Start Lat : S 15 : 42.943 Start Lon : E 32 : 16.017
Finish Lat : S 15 : 51.600 Finish Lon : E 32 : 16.017
Length : 16.03 km

Transect # : 8
Start Lat : S 15 : 51.600 Start Lon : E 32 : 14.896
Finish Lat : S 15 : 41.922 Finish Lon : E 32 : 14.896
Length : 17.92 km
Transect # : 9
Start Lat : S 15 : 41.982 Start Lon : E 32 : 13.775
Finish Lat : S 15 : 51.600 Finish Lon : E 32 : 13.775
Length : 17.81 km

Transect # : 10A
Start Lat : S 15 : 51.600 Start Lon : E 32 : 12.654
Finish Lat : S 15 : 43.639 Finish Lon : E 32 : 12.654
Length : 14.74 km

Transect # : 10B
Start Lat : S 15 : 42.266 Start Lon : E 32 : 12.654
Finish Lat : S 15 : 41.293 Finish Lon : E 32 : 12.654
Length : 1.80 km

Transect # : 11A
Start Lat : S 15 : 41.426 Start Lon : E 32 : 11.533
Finish Lat : S 15 : 42.020 Finish Lon : E 32 : 11.533
Length : 1.10 km

Transect # : 11B
Start Lat : S 15 : 42.887 Start Lon : E 32 : 11.533
Finish Lat : S 15 : 45.720 Finish Lon : E 32 : 11.533
Length : 5.22 km

Transect # : 12
Start Lat : S 15 : 45.468 Start Lon : E 32 : 10.412
Finish Lat : S 15 : 44.365 Finish Lon : E 32 : 10.412
Length : 2.03 km

Transect # : 13
Start Lat : S 15 : 45.322 Start Lon : E 32 : 9.291
Finish Lat : S 15 : 51.600 Finish Lon : E 32 : 9.291
Length : 11.63 km

Transect # : 14
Start Lat : S 15 : 51.600 Start Lon : E 32 : 8.170
Finish Lat : S 15 : 46.531 Finish Lon : E 32 : 8.170
Length : 9.39 km

Transect # : 15
Start Lat : S 15 : 47.482 Start Lon : E 32 : 7.049
Finish Lat : S 15 : 51.600 Finish Lon : E 32 : 7.049
Length : 7.63 km

Transect # : 16
Start Lat : S 15 : 51.600 Start Lon : E 32 : 5.928
Finish Lat : S 15 : 46.313 Finish Lon : E 32 : 5.928
Length : 9.79 km
Transect # : 17
Start Lat : S 15 : 46.263 Start Lon : E 32 : 4.807
Finish Lat : S 15 : 51.600 Finish Lon : E 32 : 4.807
Length : 9.88 km

Transect # : 18A

Start Lat : S 15 : 51.600 Start Lon : E 32 : 3.686
Finish Lat : S 15 : 45.332 Finish Lon : E 32 : 3.686
Length : 11.61 km

Transect # : 18B
Start Lat : S 15 : 44.927 Start Lon : E 32 : 3.686
Finish Lat : S 15 : 44.721 Finish Lon : E 32 : 3.686
Length : 0.38 km

Transect # : 19
Start Lat : S 15 : 45.415 Start Lon : E 32 : 2.565
Finish Lat : S 15 : 51.600 Finish Lon : E 32 : 2.565
Length : 11.45 km

Transect # : 20
Start Lat : S 15 : 51.600 Start Lon : E 32 : 1.444
Finish Lat : S 15 : 44.831 Finish Lon : E 32 : 1.444
Length : 12.54 km

Chintholo 1
Number of transects : 23
Transect Bearing : 0.00 Degrees
Transect Spacing : 2.00 km

Transect # : 1
Start Lat : S 16 : 4.200 Start Lon : E 32 : 26.055
Finish Lat : S 16 : 18.140 Finish Lon : E 32 : 26.055
Length : 25.82 km - Not flown

Transect # : 2
Start Lat : S 16 : 17.771 Start Lon : E 32 : 24.931
Finish Lat : S 16 : 4.200 Finish Lon : E 32 : 24.931
Length : 25.13 km – Not flown

Transect # : 3
Start Lat : S 16 : 15.276 Start Lon : E 32 : 23.808
Finish Lat : S 16 : 17.402 Finish Lon : E 32 : 23.808
Length : 3.91 km

Transect # : 4
Start Lat : S 16 : 17.033 Start Lon : E 32 : 22.685
Finish Lat : S 16 : 12.056 Finish Lon : E 32 : 22.685
Length : 9.18 km

Transect # : 5
Start Lat : S 16 : 11.963 Start Lon : E 32 : 21.562
Finish Lat : S 16 : 16.664 Finish Lon : E 32 : 21.562
Length : 8.67 km

Transect # : 6
Start Lat : S 16 : 16.295 Start Lon : E 32 : 20.439
Finish Lat : S 16 : 9.922 Finish Lon : E 32 : 20.439
Length : 11.75 km

Transect # : 7
Start Lat : S 16 : 10.224 Start Lon : E 32 : 19.316
Finish Lat : S 16 : 15.925 Finish Lon : E 32 : 19.316
Length : 10.51 km

Transect # : 8
Start Lat : S 16 : 15.556 Start Lon : E 32 : 18.192
Finish Lat : S 16 : 7.835 Finish Lon : E 32 : 18.192
Length : 14.24 km

Transect # : 9
Start Lat : S 16 : 7.580 Start Lon : E 32 : 17.069
Finish Lat : S 16 : 15.187 Finish Lon : E 32 : 17.069
Length : 14.03 km
Transect # : 10
Start Lat : S 16 : 15.000 Start Lon : E 32 : 15.946
Finish Lat : S 16 : 4.200 Finish Lon : E 32 : 15.946
Length : 20.00 km

Transect # : 11
Start Lat : S 16 : 4.200 Start Lon : E 32 : 14.823
Finish Lat : S 16 : 15.000 Finish Lon : E 32 : 14.823
Length : 20.00 km

Transect # : 12
Start Lat : S 16 : 15.000 Start Lon : E 32 : 13.700
Finish Lat : S 16 : 4.200 Finish Lon : E 32 : 13.700
Length : 20.00 km

Transect # : 13
Start Lat : S 16 : 5.052 Start Lon : E 32 : 12.577
Finish Lat : S 16 : 10.943 Finish Lon : E 32 : 12.577
Length : 10.86 km

Transect # : 14
Start Lat : S 16 : 15.000 Start Lon : E 32 : 11.453
Finish Lat : S 16 : 4.200 Finish Lon : E 32 : 11.453
Length : 20.00 km

Transect # : 15
Start Lat : S 16 : 4.200 Start Lon : E 32 : 10.330
Finish Lat : S 16 : 15.000 Finish Lon : E 32 : 10.330
Length : 20.00 km

Transect # : 16
Start Lat : S 16 : 15.000 Start Lon : E 32 : 9.207
Finish Lat : S 16 : 4.200 Finish Lon : E 32 : 9.207
Length : 20.00 km

Transect # : 17
Start Lat : S 16 : 4.200 Start Lon : E 32 : 8.084
Finish Lat : S 16 : 15.000 Finish Lon : E 32 : 8.084
Length : 20.00 km

Transect # : 18
Start Lat : S 16 : 15.000 Start Lon : E 32 : 6.961
Finish Lat : S 16 : 4.200 Finish Lon : E 32 : 6.961
Length : 20.00 km
Transect # : 19
Start Lat : S 16 : 4.200 Start Lon : E 32 : 5.837
Finish Lat : S 16 : 15.000 Finish Lon : E 32 : 5.837
Length : 20.00 km

Transect # : 20
Start Lat : S 16 : 15.000 Start Lon : E 32 : 4.714
Finish Lat : S 16 : 4.200 Finish Lon : E 32 : 4.714

Length : 20.00 km

Transect # : 21
Start Lat : S 16 : 4.200 Start Lon : E 32 : 3.591
Finish Lat : S 16 : 15.000 Finish Lon : E 32 : 3.591
Length : 20.00 km

Transect # : 22
Start Lat : S 16 : 15.000 Start Lon : E 32 : 2.468
Finish Lat : S 16 : 4.200 Finish Lon : E 32 : 2.468
Length : 20.00 km

Transect # : 23
Start Lat : S 16 : 4.200 Start Lon : E 32 : 1.345
Finish Lat : S 16 : 15.000 Finish Lon : E 32 : 1.345
Length : 20.00 km

Chitima 2
Number of transects : 26
Transect Bearing : 90.00 Degrees
Transect Spacing : 2.00 km

Transect # : 1
Start Lat : S 15 : 41.111 Start Lon : E 32 : 22.859
Finish Lat : S 15 : 41.111 Finish Lon : E 32 : 31.822
Length : 15.98 km

Transect # : 2
Start Lat : S 15 : 42.191 Start Lon : E 32 : 33.165
Finish Lat : S 15 : 42.191 Finish Lon : E 32 : 22.858
Length : 18.38 km

Transect # : 3
Start Lat : S 15 : 43.271 Start Lon : E 32 : 22.856
Finish Lat : S 15 : 43.271 Finish Lon : E 32 : 34.422
Length : 20.63 km

Transect # : 4
Start Lat : S 15 : 44.351 Start Lon : E 32 : 35.680
Finish Lat : S 15 : 44.351 Finish Lon : E 32 : 22.855
Length : 22.87 km

Transect # : 5
Start Lat : S 15 : 45.431 Start Lon : E 32 : 22.854
Finish Lat : S 15 : 45.431 Finish Lon : E 32 : 36.938
Length : 25.12 km

Transect # : 6
Start Lat : S 15 : 46.511 Start Lon : E 32 : 38.195
Finish Lat : S 15 : 46.511 Finish Lon : E 32 : 22.853
Length : 27.36 km

Transect # : 7
Start Lat : S 15 : 47.591 Start Lon : E 32 : 22.851
Finish Lat : S 15 : 47.591 Finish Lon : E 32 : 39.036
Length : 28.86 km

Transect # : 8
Start Lat : S 15 : 48.671 Start Lon : E 32 : 39.036
Finish Lat : S 15 : 48.671 Finish Lon : E 32 : 22.850
Length : 28.86 km

Transect # : 9
Start Lat : S 15 : 49.751 Start Lon : E 32 : 22.849
Finish Lat : S 15 : 49.751 Finish Lon : E 32 : 39.036
Length : 28.87 km

Transect # : 10
Start Lat : S 15 : 50.831 Start Lon : E 32 : 39.036
Finish Lat : S 15 : 50.831 Finish Lon : E 32 : 22.848
Length : 28.87 km

Transect # : 11
Start Lat : S 15 : 51.911 Start Lon : E 32 : 26.724
Finish Lat : S 15 : 51.911 Finish Lon : E 32 : 39.036
Length : 21.96 km

Transect # : 12
Start Lat : S 15 : 52.991 Start Lon : E 32 : 39.036
Finish Lat : S 15 : 52.991 Finish Lon : E 32 : 26.724
Length : 21.96 km

Transect # : 13
Start Lat : S 15 : 54.071 Start Lon : E 32 : 26.724
Finish Lat : S 15 : 54.071 Finish Lon : E 32 : 39.036
Length : 21.96 km

Transect # : 14
Start Lat : S 15 : 55.151 Start Lon : E 32 : 39.036
Finish Lat : S 15 : 55.151 Finish Lon : E 32 : 26.724
Length : 21.96 km

Transect # : 15
Start Lat : S 15 : 56.231 Start Lon : E 32 : 26.724
Finish Lat : S 15 : 56.231 Finish Lon : E 32 : 39.036
Length : 21.96 km

Transect # : 16
Start Lat : S 15 : 57.311 Start Lon : E 32 : 39.036
Finish Lat : S 15 : 57.311 Finish Lon : E 32 : 26.724
Length : 21.96 km

Transect # : 17
Start Lat : S 15 : 58.391 Start Lon : E 32 : 26.724
Finish Lat : S 15 : 58.391 Finish Lon : E 32 : 39.036
Length : 21.96 km

Transect # : 18
Start Lat : S 15 : 59.471 Start Lon : E 32 : 39.036
Finish Lat : S 15 : 59.471 Finish Lon : E 32 : 26.724
Length : 21.96 km

Transect # : 19
Start Lat : S 16 : 0.551 Start Lon : E 32 : 26.724
Finish Lat : S 16 : 0.551 Finish Lon : E 32 : 39.036
Length : 21.96 km

Transect # : 20
Start Lat : S 16 : 1.631 Start Lon : E 32 : 39.036
Finish Lat : S 16 : 1.631 Finish Lon : E 32 : 26.724
Length : 21.96 km

Transect # : 21
Start Lat : S 16 : 2.711 Start Lon : E 32 : 26.724
Finish Lat : S 16 : 2.711 Finish Lon : E 32 : 39.036
Length : 21.96 km

Transect # : 22
Start Lat : S 16 : 3.791 Start Lon : E 32 : 39.036
Finish Lat : S 16 : 3.791 Finish Lon : E 32 : 26.724
Length : 21.96 km

Transect # : 23
Start Lat : S 16 : 4.871 Start Lon : E 32 : 26.724
Finish Lat : S 16 : 4.871 Finish Lon : E 32 : 39.036
Length : 21.96 km

Transect # : 24
Start Lat : S 16 : 5.951 Start Lon : E 32 : 39.036
Finish Lat : S 16 : 5.951 Finish Lon : E 32 : 26.724
Length : 21.96 km

Transect # : 25
Start Lat : S 16 : 7.031 Start Lon : E 32 : 26.724
Finish Lat : S 16 : 7.031 Finish Lon : E 32 : 39.036
Length : 21.96 km

Transect # : 26
Start Lat : S 16 : 8.111 Start Lon : E 32 : 39.036
Finish Lat : S 16 : 8.111 Finish Lon : E 32 : 26.724
Length : 21.96 km

Kachembe
Number of transects : 20
Transect Bearing : 90.00 Degrees
Transect Spacing : 2.00 km

Transect # : 1
Start Lat : S 15 : 47.312 Start Lon : E 32 : 39.128
Finish Lat : S 15 : 47.312 Finish Lon : E 32 : 39.036
Length : 0.16 km – Not flown

Transect # : 2
Start Lat : S 15 : 48.392 Start Lon : E 32 : 39.036
Finish Lat : S 15 : 48.392 Finish Lon : E 32 : 40.386
Length : 2.41 km

Transect # : 3
Start Lat : S 15 : 49.472 Start Lon : E 32 : 41.643
Finish Lat : S 15 : 49.472 Finish Lon : E 32 : 39.036
Length : 4.65 km

Transect # : 4
Start Lat : S 15 : 50.552 Start Lon : E 32 : 39.036
Finish Lat : S 15 : 50.552 Finish Lon : E 32 : 42.901
Length : 6.89 km

Transect # : 5
Start Lat : S 15 : 51.632 Start Lon : E 32 : 44.158
Finish Lat : S 15 : 51.632 Finish Lon : E 32 : 39.036
Length : 9.13 km

Transect # : 6
Start Lat : S 15 : 52.712 Start Lon : E 32 : 39.036
Finish Lat : S 15 : 52.712 Finish Lon : E 32 : 45.416
Length : 11.37 km

Transect # : 7
Start Lat : S 15 : 53.792 Start Lon : E 32 : 46.673
Finish Lat : S 15 : 53.792 Finish Lon : E 32 : 39.036
Length : 13.61 km

Transect # : 8
Start Lat : S 15 : 54.872 Start Lon : E 32 : 39.036
Finish Lat : S 15 : 54.872 Finish Lon : E 32 : 47.931
Length : 15.85 km

Transect # : 9
Start Lat : S 15 : 55.952 Start Lon : E 32 : 48.633
Finish Lat : S 15 : 55.952 Finish Lon : E 32 : 39.036
Length : 17.10 km

Transect # : 10
Start Lat : S 15 : 57.032 Start Lon : E 32 : 39.036
Finish Lat : S 15 : 57.032 Finish Lon : E 32 : 48.990
Length : 17.74 km

Transect # : 11
Start Lat : S 15 : 58.112 Start Lon : E 32 : 49.348
Finish Lat : S 15 : 58.112 Finish Lon : E 32 : 39.036
Length : 18.38 km

Transect # : 12
Start Lat : S 15 : 59.192 Start Lon : E 32 : 39.036
Finish Lat : S 15 : 59.192 Finish Lon : E 32 : 49.705
Length : 19.02 km

Transect # : 13
Start Lat : S 16 : 0.272 Start Lon : E 32 : 50.191
Finish Lat : S 16 : 0.272 Finish Lon : E 32 : 39.036
Length : 19.88 km

Transect # : 14
Start Lat : S 16 : 1.352 Start Lon : E 32 : 39.036
Finish Lat : S 16 : 1.352 Finish Lon : E 32 : 51.691
Length : 22.55 km

Transect # : 15
Start Lat : S 16 : 2.432 Start Lon : E 32 : 52.098
Finish Lat : S 16 : 2.432 Finish Lon : E 32 : 39.036
Length : 23.28 km

Transect # : 16
Start Lat : S 16 : 3.512 Start Lon : E 32 : 39.036
Finish Lat : S 16 : 3.512 Finish Lon : E 32 : 52.915
Length : 24.74 km

Transect # : 17
Start Lat : S 16 : 4.592 Start Lon : E 32 : 53.620
Finish Lat : S 16 : 4.592 Finish Lon : E 32 : 39.036
Length : 25.99 km

Transect # : 18
Start Lat : S 16 : 5.672 Start Lon : E 32 : 39.036

Finish Lat : S 16 : 5.672 Finish Lon : E 32 : 54.476
Length : 27.52 km

Transect # : 19
Start Lat : S 16 : 6.752 Start Lon : E 32 : 54.673
Finish Lat : S 16 : 6.752 Finish Lon : E 32 : 39.036
Length : 27.87 km

Chintholo 3
Number of transects : 28
Transect Bearing : 0.00 Degrees
Transect Spacing : 2.00 km

Transect # : 1
Start Lat : S 16 : 8.667 Start Lon : E 32 : 27.818
Finish Lat : S 16 : 18.720 Finish Lon : E 32 : 27.818
Length : 18.62 km

Transect # : 2
Start Lat : S 16 : 19.090 Start Lon : E 32 : 28.941
Finish Lat : S 16 : 8.667 Finish Lon : E 32 : 28.941
Length : 19.30 km

Transect # : 3
Start Lat : S 16 : 8.667 Start Lon : E 32 : 30.064
Finish Lat : S 16 : 19.459 Finish Lon : E 32 : 30.064
Length : 19.99 km

Transect # : 4
Start Lat : S 16 : 19.828 Start Lon : E 32 : 31.187
Finish Lat : S 16 : 8.667 Finish Lon : E 32 : 31.187
Length : 20.67 km

Transect # : 5
Start Lat : S 16 : 8.667 Start Lon : E 32 : 32.311
Finish Lat : S 16 : 20.198 Finish Lon : E 32 : 32.311
Length : 21.35 km

Transect # : 6
Start Lat : S 16 : 20.567 Start Lon : E 32 : 33.434
Finish Lat : S 16 : 8.667 Finish Lon : E 32 : 33.434
Length : 22.04 km

Transect # : 7
Start Lat : S 16 : 8.667 Start Lon : E 32 : 34.557
Finish Lat : S 16 : 20.937 Finish Lon : E 32 : 34.557
Length : 22.72 km

Transect # : 8
Start Lat : S 16 : 21.306 Start Lon : E 32 : 35.681
Finish Lat : S 16 : 8.667 Finish Lon : E 32 : 35.681
Length : 23.41 km

Transect # : 9
Start Lat : S 16 : 8.667 Start Lon : E 32 : 36.804
Finish Lat : S 16 : 21.676 Finish Lon : E 32 : 36.804
Length : 24.09 km
Transect # : 10
Start Lat : S 16 : 22.045 Start Lon : E 32 : 37.927
Finish Lat : S 16 : 8.667 Finish Lon : E 32 : 37.927
Length : 24.77 km

Transect # : 11
Start Lat : S 16 : 8.667 Start Lon : E 32 : 39.050
Finish Lat : S 16 : 22.415 Finish Lon : E 32 : 39.050
Length : 25.46 km

Transect # : 12
Start Lat : S 16 : 22.784 Start Lon : E 32 : 40.174
Finish Lat : S 16 : 8.667 Finish Lon : E 32 : 40.174
Length : 26.14 km

Transect # : 13
Start Lat : S 16 : 8.667 Start Lon : E 32 : 41.297
Finish Lat : S 16 : 23.153 Finish Lon : E 32 : 41.297
Length : 26.83 km

Transect # : 14
Start Lat : S 16 : 23.523 Start Lon : E 32 : 42.420
Finish Lat : S 16 : 8.667 Finish Lon : E 32 : 42.420
Length : 27.51 km

Transect # : 15
Start Lat : S 16 : 8.667 Start Lon : E 32 : 43.544
Finish Lat : S 16 : 22.788 Finish Lon : E 32 : 43.544
Length : 26.15 km

Transect # : 16
Start Lat : S 16 : 22.788 Start Lon : E 32 : 44.667
Finish Lat : S 16 : 8.667 Finish Lon : E 32 : 44.667
Length : 26.15 km

Transect # : 17
Start Lat : S 16 : 8.667 Start Lon : E 32 : 45.790
Finish Lat : S 16 : 22.788 Finish Lon : E 32 : 45.790
Length : 26.15 km

Transect # : 18
Start Lat : S 16 : 22.788 Start Lon : E 32 : 46.913
Finish Lat : S 16 : 8.667 Finish Lon : E 32 : 46.913
Length : 26.15 km
Transect # : 19
Start Lat : S 16 : 8.667 Start Lon : E 32 : 48.037
Finish Lat : S 16 : 22.788 Finish Lon : E 32 : 48.037
Length : 26.15 km

Transect # : 20
Start Lat : S 16 : 22.788 Start Lon : E 32 : 49.160
Finish Lat : S 16 : 8.667 Finish Lon : E 32 : 49.160
Length : 26.15 km

Transect # : 21
Start Lat : S 16 : 8.667 Start Lon : E 32 : 50.283
Finish Lat : S 16 : 22.788 Finish Lon : E 32 : 50.283
Length : 26.15 km

Transect # : 20
Start Lat : S 16 : 7.832 Start Lon : E 32 : 39.036
Finish Lat : S 16 : 7.832 Finish Lon : E 32 : 56.735
Length : 31.54 km

Transect # : 22
Start Lat : S 16 : 22.788 Start Lon : E 32 : 51.407
Finish Lat : S 16 : 8.667 Finish Lon : E 32 : 51.407
Length : 26.15 km

Transect # : 23A
Start Lat : S 16 : 8.667 Start Lon : E 32 : 52.530
Finish Lat : S 16 : 14.068 Finish Lon : E 32 : 52.530
Length : 10.00 km

Transect # : 23B
Start Lat : S 16 : 14.408 Start Lon : E 32 : 52.530
Finish Lat : S 16 : 22.788 Finish Lon : E 32 : 52.530
Length : 15.52 km

Transect # : 24A
Start Lat : S 16 : 22.788 Start Lon : E 32 : 53.653
Finish Lat : S 16 : 15.846 Finish Lon : E 32 : 53.653
Length : 12.86 km

Transect # : 24B
Start Lat : S 16 : 11.387 Start Lon : E 32 : 53.653
Finish Lat : S 16 : 8.667 Finish Lon : E 32 : 53.653
Length : 5.01 km

Transect # : 25A
Start Lat : S 16 : 8.667 Start Lon : E 32 : 54.776
Finish Lat : S 16 : 12.299 Finish Lon : E 32 : 54.776
Length : 6.70 km

Transect # : 25B
Start Lat : S 16 : 17.508 Start Lon : E 32 : 54.776
Finish Lat : S 16 : 22.788 Finish Lon : E 32 : 54.776
Length : 9.78 km

Transect # : 26A
Start Lat : S 16 : 22.788 Start Lon : E 32 : 55.900
Finish Lat : S 16 : 19.062 Finish Lon : E 32 : 55.900
Length : 6.90 km

Transect # : 26B
Start Lat : S 16 : 11.877 Start Lon : E 32 : 55.900
Finish Lat : S 16 : 8.667 Finish Lon : E 32 : 55.900
Length : 5.94 km

Transect # : 27A
Start Lat : S 16 : 8.667 Start Lon : E 32 : 57.023
Finish Lat : S 16 : 10.850 Finish Lon : E 32 : 57.023
Length : 4.02 km

Transect # : 27B
Start Lat : S 16 : 20.467 Start Lon : E 32 : 57.023
Finish Lat : S 16 : 22.788 Finish Lon : E 32 : 57.023
Length : 4.30 km

Transect # : 28A
Start Lat : S 16 : 22.788 Start Lon : E 32 : 58.146
Finish Lat : S 16 : 21.491 Finish Lon : E 32 : 58.146
Length : 2.40 km

Transect # : 28B
Start Lat : S 16 : 10.416 Start Lon : E 32 : 58.146
Finish Lat : S 16 : 9.031 Finish Lon : E 32 : 58.146
Length : 2.56 km

Chintholo 4
Number of transects : 23
Transect Bearing : 0.00 Degrees
Transect Spacing : 2.00 km

Transect # : 1
Start Lat : S 16 : 15.286 Start Lon : E 32 : 17.370
Finish Lat : S 16 : 26.139 Finish Lon : E 32 : 17.370
Length : 20.10 km

Transect # : 2
Start Lat : S 16 : 26.438 Start Lon : E 32 : 18.494
Finish Lat : S 16 : 15.655 Finish Lon : E 32 : 18.494
Length : 19.97 km

Transect # : 3
Start Lat : S 16 : 16.025 Start Lon : E 32 : 19.619
Finish Lat : S 16 : 26.736 Finish Lon : E 32 : 19.619
Length : 19.84 km

Transect # : 4
Start Lat : S 16 : 27.040 Start Lon : E 32 : 20.743
Finish Lat : S 16 : 16.395 Finish Lon : E 32 : 20.743
Length : 19.71 km

Transect # : 5
Start Lat : S 16 : 16.764 Start Lon : E 32 : 21.868
Finish Lat : S 16 : 27.347 Finish Lon : E 32 : 21.868
Length : 19.60 km

Transect # : 6
Start Lat : S 16 : 27.673 Start Lon : E 32 : 22.992
Finish Lat : S 16 : 17.134 Finish Lon : E 32 : 22.992
Length : 19.52 km

Transect # : 7
Start Lat : S 16 : 17.503 Start Lon : E 32 : 24.117
Finish Lat : S 16 : 28.015 Finish Lon : E 32 : 24.117
Length : 19.47 km

Transect # : 8
Start Lat : S 16 : 28.394 Start Lon : E 32 : 25.241
Finish Lat : S 16 : 17.873 Finish Lon : E 32 : 25.241
Length : 19.48 km

Transect # : 9
Start Lat : S 16 : 18.243 Start Lon : E 32 : 26.366
Finish Lat : S 16 : 28.822 Finish Lon : E 32 : 26.366
Length : 19.59 km

Transect # : 10
Start Lat : S 16 : 29.258 Start Lon : E 32 : 27.490
Finish Lat : S 16 : 18.612 Finish Lon : E 32 : 27.490
Length : 19.71 km

Transect # : 11

Start Lat : S 16 : 18.982 Start Lon : E 32 : 28.615
Finish Lat : S 16 : 29.694 Finish Lon : E 32 : 28.615
Length : 19.84 km

Transect # : 12
Start Lat : S 16 : 30.127 Start Lon : E 32 : 29.739
Finish Lat : S 16 : 19.352 Finish Lon : E 32 : 29.739
Length : 19.95 km

Transect # : 13
Start Lat : S 16 : 19.722 Start Lon : E 32 : 30.864
Finish Lat : S 16 : 30.559 Finish Lon : E 32 : 30.864
Length : 20.07 km

Transect # : 14
Start Lat : S 16 : 30.991 Start Lon : E 32 : 31.988
Finish Lat : S 16 : 22.916 Finish Lon : E 32 : 31.988
Length : 14.89 km

Transect # : 15
Start Lat : S 16 : 22.916 Start Lon : E 32 : 33.113
Finish Lat : S 16 : 31.423 Finish Lon : E 32 : 33.113
Length : 15.68 km

Transect # : 16
Start Lat : S 16 : 31.823 Start Lon : E 32 : 34.237
Finish Lat : S 16 : 20.831 Finish Lon : E 32 : 34.237
Length : 20.35 km

Transect # : 17
Start Lat : S 16 : 21.201 Start Lon : E 32 : 35.362
Finish Lat : S 16 : 32.378 Finish Lon : E 32 : 35.362
Length : 20.70 km

Transect # : 18
Start Lat : S 16 : 32.932 Start Lon : E 32 : 36.486
Finish Lat : S 16 : 21.571 Finish Lon : E 32 : 36.486
Length : 21.04 km

Transect # : 19
Start Lat : S 16 : 21.941 Start Lon : E 32 : 37.611
Finish Lat : S 16 : 33.475 Finish Lon : E 32 : 37.611
Length : 21.36 km

Transect # : 20
Start Lat : S 16 : 34.013 Start Lon : E 32 : 38.735
Finish Lat : S 16 : 22.311 Finish Lon : E 32 : 38.735
Length : 21.67 km

Transect # : 21
Start Lat : S 16 : 22.681 Start Lon : E 32 : 39.859
Finish Lat : S 16 : 34.537 Finish Lon : E 32 : 39.859
Length : 21.96 km

Transect # : 22
Start Lat : S 16 : 35.063 Start Lon : E 32 : 40.984
Finish Lat : S 16 : 23.050 Finish Lon : E 32 : 40.984
Length : 22.25 km

Transect # : 23
Start Lat : S 16 : 23.420 Start Lon : E 32 : 42.108
Finish Lat : S 16 : 34.505 Finish Lon : E 32 : 42.108
Length : 20.44 km

Luenha
Number of transects : 43
Transect Bearing : 90.00 Degrees
Transect Spacing : 2.00 km

Transect # : 1
Start Lat : S 16 : 34.764 Start Lon : E 33 : 11.816
Finish Lat : S 16 : 34.764 Finish Lon : E 33 : 13.001
Length : 2.11 km

Transect # : 2
Start Lat : S 16 : 35.844 Start Lon : E 33 : 13.051
Finish Lat : S 16 : 35.844 Finish Lon : E 33 : 11.169
Length : 3.34 km

Transect # : 3
Start Lat : S 16 : 36.924 Start Lon : E 33 : 8.760
Finish Lat : S 16 : 36.924 Finish Lon : E 33 : 13.100
Length : 7.71 km

Transect # : 4
Start Lat : S 16 : 38.004 Start Lon : E 33 : 13.149
Finish Lat : S 16 : 38.004 Finish Lon : E 33 : 7.685
Length : 9.70 km

Transect # : 5
Start Lat : S 16 : 39.084 Start Lon : E 33 : 5.220
Finish Lat : S 16 : 39.084 Finish Lon : E 33 : 13.198
Length : 14.16 km

Transect # : 6
Start Lat : S 16 : 40.164 Start Lon : E 33 : 13.247
Finish Lat : S 16 : 40.164 Finish Lon : E 33 : 4.331
Length : 15.83 km

Transect # : 7
Start Lat : S 16 : 41.244 Start Lon : E 33 : 3.557
Finish Lat : S 16 : 41.244 Finish Lon : E 33 : 13.296
Length : 17.29 km

Transect # : 8
Start Lat : S 16 : 42.324 Start Lon : E 33 : 13.345
Finish Lat : S 16 : 42.324 Finish Lon : E 33 : 2.370
Length : 19.49 km

Transect # : 9
Start Lat : S 16 : 43.404 Start Lon : E 33 : 3.131
Finish Lat : S 16 : 43.404 Finish Lon : E 33 : 13.394
Length : 18.22 km

Transect # : 10
Start Lat : S 16 : 44.484 Start Lon : E 33 : 13.444
Finish Lat : S 16 : 44.484 Finish Lon : E 33 : 3.892
Length : 16.96 km

Transect # : 11
Start Lat : S 16 : 45.564 Start Lon : E 33 : 4.653
Finish Lat : S 16 : 45.564 Finish Lon : E 33 : 13.493

Length : 15.69 km

Transect # : 12
Start Lat : S 16 : 46.644 Start Lon : E 33 : 13.542
Finish Lat : S 16 : 46.644 Finish Lon : E 33 : 5.414
Length : 14.43 km

Transect # : 13
Start Lat : S 16 : 47.724 Start Lon : E 33 : 6.175
Finish Lat : S 16 : 47.724 Finish Lon : E 33 : 13.591
Length : 13.17 km

Transect # : 14
Start Lat : S 16 : 48.804 Start Lon : E 33 : 13.640
Finish Lat : S 16 : 48.804 Finish Lon : E 33 : 6.936
Length : 11.90 km

Transect # : 15
Start Lat : S 16 : 49.884 Start Lon : E 33 : 7.697
Finish Lat : S 16 : 49.884 Finish Lon : E 33 : 13.689
Length : 10.64 km

Transect # : 16
Start Lat : S 16 : 50.964 Start Lon : E 33 : 13.773
Finish Lat : S 16 : 50.964 Finish Lon : E 33 : 8.458
Length : 9.44 km

Transect # : 17
Start Lat : S 16 : 52.044 Start Lon : E 33 : 8.472
Finish Lat : S 16 : 52.044 Finish Lon : E 33 : 14.313
Length : 10.37 km

Transect # : 18
Start Lat : S 16 : 53.124 Start Lon : E 33 : 14.865
Finish Lat : S 16 : 53.124 Finish Lon : E 33 : 7.955
Length : 12.27 km

Transect # : 19
Start Lat : S 16 : 54.204 Start Lon : E 33 : 7.438
Finish Lat : S 16 : 54.204 Finish Lon : E 33 : 14.425
Length : 12.41 km

Transect # : 20
Start Lat : S 16 : 55.284 Start Lon : E 33 : 14.141
Finish Lat : S 16 : 55.284 Finish Lon : E 33 : 6.920
Length : 12.82 km

Transect # : 21
Start Lat : S 16 : 56.364 Start Lon : E 33 : 6.403
Finish Lat : S 16 : 56.364 Finish Lon : E 33 : 13.622
Length : 12.82 km

Transect # : 22
Start Lat : S 16 : 57.444 Start Lon : E 33 : 13.093
Finish Lat : S 16 : 57.444 Finish Lon : E 33 : 5.885
Length : 12.80 km

Transect # : 23
Start Lat : S 16 : 58.524 Start Lon : E 33 : 5.368
Finish Lat : S 16 : 58.524 Finish Lon : E 33 : 13.045
Length : 13.63 km

Transect # : 24
Start Lat : S 16 : 59.604 Start Lon : E 33 : 12.456
Finish Lat : S 16 : 59.604 Finish Lon : E 33 : 4.850
Length : 13.50 km

Transect # : 25
Start Lat : S 17 : 0.684 Start Lon : E 33 : 4.333
Finish Lat : S 17 : 0.684 Finish Lon : E 33 : 11.033
Length : 11.89 km

Transect # : 26
Start Lat : S 17 : 1.764 Start Lon : E 33 : 9.329
Finish Lat : S 17 : 1.764 Finish Lon : E 33 : 3.816
Length : 9.79 km

Transect # : 27
Start Lat : S 17 : 2.844 Start Lon : E 33 : 3.298
Finish Lat : S 17 : 2.844 Finish Lon : E 33 : 8.495
Length : 9.23 km

Transect # : 28
Start Lat : S 17 : 3.924 Start Lon : E 33 : 8.610
Finish Lat : S 17 : 3.924 Finish Lon : E 33 : 2.781
Length : 10.35 km

Transect # : 29
Start Lat : S 17 : 5.004 Start Lon : E 33 : 2.264
Finish Lat : S 17 : 5.004 Finish Lon : E 33 : 7.683
Length : 9.62 km

Transect # : 30
Start Lat : S 17 : 6.084 Start Lon : E 33 : 6.846
Finish Lat : S 17 : 6.084 Finish Lon : E 33 : 1.746
Length : 9.06 km

Transect # : 31
Start Lat : S 17 : 7.164 Start Lon : E 33 : 1.229
Finish Lat : S 17 : 7.164 Finish Lon : E 33 : 6.599
Length : 9.54 km

Transect # : 32
Start Lat : S 17 : 8.244 Start Lon : E 33 : 7.470
Finish Lat : S 17 : 8.244 Finish Lon : E 33 : 0.711
Length : 12.00 km

Transect # : 33
Start Lat : S 17 : 9.324 Start Lon : E 33 : 0.716
Finish Lat : S 17 : 9.324 Finish Lon : E 33 : 6.451
Length : 10.17 km

Transect # : 34
Start Lat : S 17 : 10.404 Start Lon : E 33 : 5.939
Finish Lat : S 17 : 10.404 Finish Lon : E 32 : 59.677
Length : 11.12 km

Transect # : 35
Start Lat : S 17 : 11.484 Start Lon : E 32 : 59.496
Finish Lat : S 17 : 11.484 Finish Lon : E 33 : 5.362
Length : 10.41 km

Transect # : 36
Start Lat : S 17 : 12.564 Start Lon : E 33 : 5.525
Finish Lat : S 17 : 12.564 Finish Lon : E 32 : 59.586
Length : 10.54 km

Transect # : 37
Start Lat : S 17 : 13.644 Start Lon : E 32 : 59.661
Finish Lat : S 17 : 13.644 Finish Lon : E 33 : 5.451
Length : 10.28 km

Transect # : 38
Start Lat : S 17 : 14.724 Start Lon : E 33 : 4.693

Finish Lat : S 17 : 14.724 Finish Lon : E 32 : 59.738
Length : 8.80 km

Transect # : 39
Start Lat : S 17 : 15.804 Start Lon : E 32 : 59.780
Finish Lat : S 17 : 15.804 Finish Lon : E 33 : 4.196
Length : 7.84 km

Transect # : 40
Start Lat : S 17 : 16.884 Start Lon : E 33 : 3.881
Finish Lat : S 17 : 16.884 Finish Lon : E 32 : 59.828
Length : 7.20 km

Transect # : 41
Start Lat : S 17 : 17.964 Start Lon : E 32 : 59.892
Finish Lat : S 17 : 17.964 Finish Lon : E 33 : 3.050
Length : 5.61 km

Transect # : 42
Start Lat : S 17 : 19.044 Start Lon : E 33 : 3.068
Finish Lat : S 17 : 19.044 Finish Lon : E 33 : 1.408
Length : 2.94 km

Transect # : 43
Start Lat : S 17 : 20.124 Start Lon : E 33 : 2.336
Finish Lat : S 17 : 20.124 Finish Lon : E 33 : 3.063
Length : 1.29 km

Chipembere
Number of transects : 27
Transect Bearing : 0.00 Degrees
Transect Spacing : 2.00 km

Transect # : 1A
Start Lat : S 16 : 22.788 Start Lon : E 32 : 42.679
Finish Lat : S 16 : 34.909 Finish Lon : E 32 : 42.679
Length : 22.35 km

Transect # : 1B
Start Lat : S 16 : 36.236 Start Lon : E 32 : 42.679
Finish Lat : S 16 : 38.616 Finish Lon : E 32 : 42.679
Length : 4.41 km – Not flown

Transect # : 2
Start Lat : S 16 : 38.616 Start Lon : E 32 : 43.804
Finish Lat : S 16 : 22.788 Finish Lon : E 32 : 43.804
Length : 29.31 km

Transect # : 3
Start Lat : S 16 : 22.788 Start Lon : E 32 : 44.929
Finish Lat : S 16 : 38.616 Finish Lon : E 32 : 44.929
Length : 29.31 km

Transect # : 4
Start Lat : S 16 : 38.616 Start Lon : E 32 : 46.054
Finish Lat : S 16 : 22.788 Finish Lon : E 32 : 46.054
Length : 29.31 km

Transect # : 5
Start Lat : S 16 : 22.788 Start Lon : E 32 : 47.179
Finish Lat : S 16 : 38.616 Finish Lon : E 32 : 47.179
Length : 29.31 km

Transect # : 6
Start Lat : S 16 : 38.616 Start Lon : E 32 : 48.304
Finish Lat : S 16 : 22.788 Finish Lon : E 32 : 48.304
Length : 29.31 km
Transect # : 7
Start Lat : S 16 : 22.788 Start Lon : E 32 : 49.429
Finish Lat : S 16 : 38.616 Finish Lon : E 32 : 49.429
Length : 29.31 km

Transect # : 8
Start Lat : S 16 : 38.616 Start Lon : E 32 : 50.554
Finish Lat : S 16 : 22.788 Finish Lon : E 32 : 50.554
Length : 29.31 km

Transect # : 9
Start Lat : S 16 : 22.788 Start Lon : E 32 : 51.679
Finish Lat : S 16 : 38.616 Finish Lon : E 32 : 51.679
Length : 29.31 km

Transect # : 10
Start Lat : S 16 : 38.616 Start Lon : E 32 : 52.803
Finish Lat : S 16 : 22.788 Finish Lon : E 32 : 52.803
Length : 29.31 km

Transect # : 11
Start Lat : S 16 : 22.788 Start Lon : E 32 : 53.928
Finish Lat : S 16 : 38.616 Finish Lon : E 32 : 53.928
Length : 29.31 km

Transect # : 12
Start Lat : S 16 : 38.616 Start Lon : E 32 : 55.053
Finish Lat : S 16 : 22.788 Finish Lon : E 32 : 55.053
Length : 29.31 km

Transect # : 13
Start Lat : S 16 : 22.788 Start Lon : E 32 : 56.178
Finish Lat : S 16 : 38.616 Finish Lon : E 32 : 56.178
Length : 29.31 km

Transect # : 14
Start Lat : S 16 : 38.616 Start Lon : E 32 : 57.303
Finish Lat : S 16 : 22.788 Finish Lon : E 32 : 57.303
Length : 29.31 km

Transect # : 15
Start Lat : S 16 : 22.788 Start Lon : E 32 : 58.428
Finish Lat : S 16 : 38.616 Finish Lon : E 32 : 58.428
Length : 29.31 km

Transect # : 16
Start Lat : S 16 : 38.616 Start Lon : E 32 : 59.553
Finish Lat : S 16 : 22.972 Finish Lon : E 32 : 59.553
Length : 28.97 km

Transect # : 17
Start Lat : S 16 : 23.243 Start Lon : E 33 : 0.677
Finish Lat : S 16 : 39.921 Finish Lon : E 33 : 0.677
Length : 30.89 km

Transect # : 18
Start Lat : S 16 : 41.518 Start Lon : E 33 : 1.802
Finish Lat : S 16 : 23.514 Finish Lon : E 33 : 1.802

Length : 33.34 km

Transect # : 19
Start Lat : S 16 : 23.785 Start Lon : E 33 : 2.927
Finish Lat : S 16 : 41.500 Finish Lon : E 33 : 2.927
Length : 32.80 km

Transect # : 20
Start Lat : S 16 : 40.284 Start Lon : E 33 : 4.052
Finish Lat : S 16 : 24.057 Finish Lon : E 33 : 4.052
Length : 30.05 km

Transect # : 21
Start Lat : S 16 : 24.328 Start Lon : E 33 : 5.177
Finish Lat : S 16 : 39.224 Finish Lon : E 33 : 5.177
Length : 27.59 km

Transect # : 22
Start Lat : S 16 : 38.144 Start Lon : E 33 : 6.302
Finish Lat : S 16 : 24.599 Finish Lon : E 33 : 6.302
Length : 25.08 km

Transect # : 23
Start Lat : S 16 : 24.870 Start Lon : E 33 : 7.427
Finish Lat : S 16 : 38.084 Finish Lon : E 33 : 7.427
Length : 24.47 km

Transect # : 24
Start Lat : S 16 : 37.230 Start Lon : E 33 : 8.552
Finish Lat : S 16 : 26.212 Finish Lon : E 33 : 8.552
Length : 20.40 km

Transect # : 25
Start Lat : S 16 : 28.257 Start Lon : E 33 : 9.677
Finish Lat : S 16 : 36.580 Finish Lon : E 33 : 9.677
Length : 15.41 km

Transect # : 26
Start Lat : S 16 : 36.552 Start Lon : E 33 : 10.802
Finish Lat : S 16 : 31.463 Finish Lon : E 33 : 10.802
Length : 9.38 km

Transect # : 27
Start Lat : S 16 : 32.346 Start Lon : E 33 : 11.926
Finish Lat : S 16 : 34.540 Finish Lon : E 33 : 11.926
Length : 4.06 km

Chitima 3
Number of transects : 11
Transect Bearing : 90.00 Degrees
Transect Spacing : 2.00 km

Transect # : 1
Start Lat : S 15 : 52.608 Start Lon : E 32 : 13.336
Finish Lat : S 15 : 52.608 Finish Lon : E 32 : 0.900
Length : 22.16 km

Transect # : 2
Start Lat : S 15 : 53.688 Start Lon : E 32 : 0.900
Finish Lat : S 15 : 53.688 Finish Lon : E 32 : 13.336
Length : 22.16 km

Transect # : 3
Start Lat : S 15 : 54.768 Start Lon : E 32 : 13.336
Finish Lat : S 15 : 54.768 Finish Lon : E 32 : 0.900
Length : 22.16 km

Transect # : 4
Start Lat : S 15 : 55.848 Start Lon : E 32 : 0.900
Finish Lat : S 15 : 55.848 Finish Lon : E 32 : 13.336
Length : 22.16 km

Transect # : 5
Start Lat : S 15 : 56.928 Start Lon : E 32 : 13.336
Finish Lat : S 15 : 56.928 Finish Lon : E 32 : 0.900
Length : 22.16 km

Transect # : 6
Start Lat : S 15 : 58.008 Start Lon : E 32 : 0.900
Finish Lat : S 15 : 58.008 Finish Lon : E 32 : 13.336
Length : 22.16 km

Transect # : 7
Start Lat : S 15 : 59.088 Start Lon : E 32 : 13.336
Finish Lat : S 15 : 59.088 Finish Lon : E 32 : 0.900
Length : 22.16 km

Transect # : 8
Start Lat : S 16 : 0.168 Start Lon : E 32 : 0.900
Finish Lat : S 16 : 0.168 Finish Lon : E 32 : 13.336
Length : 22.16 km

Transect # : 9
Start Lat : S 16 : 1.248 Start Lon : E 32 : 13.336
Finish Lat : S 16 : 1.248 Finish Lon : E 32 : 0.900
Length : 22.16 km
Transect # : 10
Start Lat : S 16 : 2.328 Start Lon : E 32 : 0.900
Finish Lat : S 16 : 2.328 Finish Lon : E 32 : 13.336
Length : 22.16 km

Transect # : 11
Start Lat : S 16 : 3.408 Start Lon : E 32 : 13.336
Finish Lat : S 16 : 3.408 Finish Lon : E 32 : 0.900
Length : 22.16 km

Chitima 4
Number of transects : 11
Transect Bearing : 90.00 Degrees
Transect Spacing : 2.00 km

Transect # : 1
Start Lat : S 15 : 52.608 Start Lon : E 32 : 26.724

Finish Lat : S 15 : 52.608 Finish Lon : E 32 : 13.336
Length : 23.85 km

Transect # : 2
Start Lat : S 15 : 53.688 Start Lon : E 32 : 13.336
Finish Lat : S 15 : 53.688 Finish Lon : E 32 : 26.724
Length : 23.85 km

Transect # : 3
Start Lat : S 15 : 54.768 Start Lon : E 32 : 26.724
Finish Lat : S 15 : 54.768 Finish Lon : E 32 : 13.336
Length : 23.85 km

Transect # : 4
Start Lat : S 15 : 55.848 Start Lon : E 32 : 13.336
Finish Lat : S 15 : 55.848 Finish Lon : E 32 : 26.724
Length : 23.85 km

Transect # : 5
Start Lat : S 15 : 56.928 Start Lon : E 32 : 26.724
Finish Lat : S 15 : 56.928 Finish Lon : E 32 : 13.336
Length : 23.85 km

Transect # : 6
Start Lat : S 15 : 58.008 Start Lon : E 32 : 13.336
Finish Lat : S 15 : 58.008 Finish Lon : E 32 : 26.724
Length : 23.85 km

Transect # : 7
Start Lat : S 15 : 59.088 Start Lon : E 32 : 26.724
Finish Lat : S 15 : 59.088 Finish Lon : E 32 : 13.336
Length : 23.85 km

Transect # : 8
Start Lat : S 16 : 0.168 Start Lon : E 32 : 13.336
Finish Lat : S 16 : 0.168 Finish Lon : E 32 : 26.724
Length : 23.85 km

Transect # : 9
Start Lat : S 16 : 1.248 Start Lon : E 32 : 26.724
Finish Lat : S 16 : 1.248 Finish Lon : E 32 : 13.336
Length : 23.85 km

Transect # : 10
Start Lat : S 16 : 2.328 Start Lon : E 32 : 13.336
Finish Lat : S 16 : 2.328 Finish Lon : E 32 : 26.724
Length : 23.85 km

Transect # : 11A
Start Lat : S 16 : 3.408 Start Lon : E 32 : 26.724
Finish Lat : S 16 : 3.408 Finish Lon : E 32 : 20.411
Length : 11.26 km

Transect ~ : 11B
Start Lat : S 16 : 3.408 Start Lon : E 32 : 16.656
Finish Lat : S 16 : 3.408 Finish Lon : E 32 : 13.336
Length : 5.92 km

Appendix 4. Transect summaries of sightings

Species codes:

Code	Species
Bab	Baboon
Bbk	Bushbuck
Bpig	Bushpig
Buff	Buffalo
Camp	Poachers' camp
Catt	Cattle
Croc	Crocodile
Dkr	Common or Grey Duiker
Donk	Donkey
ElC3	Elephant carcass, age category 3
ElC4	Elephant carcass, age category 4
EleF	Elephant cow
EleM	Elephant bull
Fish	Fishing camp
Fire	Bush fire burning
Gbk	Grysbok
Ghbl	Ground hornbill
Hipo	Hippopotamus
Imp	Impala
Kudu	Kudu
Log	Commercial logging
Pig	Domestic pig
Roan	Roan antelope
Sett	Settlement
Shoa	Sheep and/or goats
Vill	Village
Water	Pan or other source of water for wildlife
Wbck	Waterbuck
Whog	Warthog
Zeb	Zebra

Other abbreviations

Abbreviation	Meaning
n	number of transects sampled
N	possible number of transects in stratum
t	Student's *t* value, $P = 0.05$
T #	transect number
-	no animals were seen in search strips

The following tables list, for each stratum, the number of individuals of each species that were seen inside the search strips on each transect.

Date of Survey : 19/10/10
Stratum Locality : Cabora Bassa
Stratum Area : 1222 km^2
N : 112 n : 27
Pilot : B. Eygabroad
Map overlay file : None

Stratum Name : Mukumbura 1
Base Line Length : 53.9 km
Calibrated Strip Width at 300ft : 457 m
t : 2.056
Observer : G.Nyaguse D.Chipesi

Transect summary table :

T #	EleF	Zeb	Imp	Kudu	Hipo	EIC3	EIC4	Camp	Catt	Shoa	Donk	Dkr	Vill	Sett	Fish	Ghbl	Whog	Croc
1	-	-	-	-	1	-	-	-	62	-	-	5	1	3	1	-	-	-
2	-	-	-	1	-	-	1	-	14	41	12	4	1	3	3	-	-	-
3	-	-	1	-	-	-	-	-	76	21	6	3	-	3	-	1	-	-
4	-	-	-	-	-	-	-	-	13	-	-	3	1	-	2	-	1	-
5	-	-	-	-	-	-	1	-	15	-	-	3	1	-	1	-	-	-
6	-	-	-	-	-	-	-	-	-	-	-	2	-	-	-	-	-	-
7	-	-	-	4	-	-	-	-	90	-	-	3	-	4	1	-	1	1
8	-	-	-	4	2	-	-	-	-	16	4	1	1	-	-	-	-	-
9	-	-	-	-	6	-	-	-	30	-	-	-	-	-	-	-	-	-
10	-	-	-	10	-	-	-	-	-	-	-	3	-	-	-	-	-	-
11	-	-	-	2	-	-	-	-	-	-	-	1	2	2	-	-	-	-
12	-	-	-	-	-	-	-	2	82	40	8	-	2	-	-	-	-	-
13	-	-	-	-	-	-	-	-	30	40	-	1	1	-	-	-	-	-
14	-	-	-	11	1	-	-	-	2	20	-	2	-	1	-	-	1	-
15	-	-	-	2	12	-	-	2	-	-	-	1	-	1	-	-	-	7
16	-	-	-	-	-	-	1	3	19	20	-	-	1	2	1	-	-	1
17	13	-	3	-	-	-	-	-	-	-	-	-	-	1	-	-	-	3
18	13	12	-	-	-	-	-	-	-	-	-	3	-	-	-	-	-	3
19	-	-	-	-	17	1	-	-	19	-	3	1	1	2	-	-	-	2
20	-	-	-	-	12	-	-	-	23	8	6	1	-	4	-	-	-	10
21	-	-	-	-	25	1	-	-	16	11	6	-	1	2	-	-	-	-
22	-	-	-	-	-	-	-	-	16	-	-	1	-	2	-	-	-	-
23	-	-	-	-	-	-	-	-	127	12	-	-	1	2	-	-	-	-
24	-	-	-	-	-	-	-	-	37	-	7	2	1	2	-	1	-	-
25	-	-	-	-	-	-	-	-	-	-	-	1	-	3	-	-	-	-
26	-	-	-	-	-	-	-	-	96	5	-	-	1	1	-	-	-	-
27	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-

Sighting Totals

	EleF	Zeb	Imp	Kudu	Hipo	EIC3	EIC4	Camp	Catt	Shoa	Donk	Dkr	Vill	Sett	Fish	Ghbl	Whog	Croc
	26	12	4	34	76	2	3	7	767	234	52	41	16	38	9	2	3	27

Date of Survey : 21/10/10
Stratum Locality : Cabora Bassa
Stratum Area : 821 km^2
N : 126 n : 29
Pilot : B. Eygabroad
Map overlay file : None

Stratum Name : Mukumbura 2
Base Line Length : 58 km
Calibrated Strip Width at 300ft : 457 m
t : 2.048
Observer : G.Nyaguse D.Chipesi

Transect summary table :

T #	EleM	Kudu	Camp	Catt	Shoa	Donk	Dkr	Vill	Sett	Fire	Bpig	Bab	Ghbl	Eltk	Hipo	Croc	Pig	Gbk
1	-	-	-	37	4	6	3	2	8	-	-	-	-	-	-	-	-	-
2	-	-	1	37	-	3	6	-	7	-	-	-	-	-	-	-	-	-
3	-	-	-	50	26	-	4	1	6	-	-	-	-	-	-	-	-	1
4	-	-	-	7	24	-	4	1	3	1	-	-	-	-	-	-	-	-
5	-	-	-	8	-	-	4	-	4	-	1	-	-	-	-	-	-	-
6	-	-	-	67	-	2	1	2	1	-	-	6	-	-	-	-	-	-
7	-	-	-	47	4	1	2	-	1	-	-	-	-	-	-	-	-	-
8	-	-	-	8	13	-	5	-	-	-	-	-	2	1	-	-	-	-
9	-	-	-	29	18	-	3	2	3	-	-	-	-	-	-	-	-	-
10	-	-	-	7	30	-	-	-	3	-	-	-	-	1	-	-	-	1
11	-	-	-	58	7	1	1	1	5	-	-	-	-	1	-	-	-	-
12	-	-	-	23	-	-	2	-	2	-	-	-	-	-	-	-	-	-
13	-	-	-	-	-	2	1	-	-	-	-	-	-	2	-	-	-	-
14	-	-	-	10	6	-	4	-	1	-	-	-	-	1	-	-	-	-
15	-	-	-	33	5	-	2	3	-	-	-	-	-	1	-	-	-	-
16	-	1	-	12	66	-	3	4	-	-	-	-	-	-	-	-	-	-
17	-	-	-	4	-	-	-	2	-	-	-	-	-	-	-	-	-	-
18	-	-	-	41	30	-	3	-	1	-	-	-	-	-	-	-	-	-
19	-	-	-	-	-	-	2	-	-	-	-	-	-	-	-	-	-	-
20	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
21	-	-	-	7	4	-	1	-	1	-	-	-	4	-	-	-	-	-
22	1	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
23	-	-	-	33	17	-	1	1	2	1	-	-	-	-	-	-	-	-
24	-	-	-	22	-	-	-	-	-	-	-	-	-	-	-	-	-	-
25	-	-	-	-	36	-	-	-	-	-	-	-	-	-	-	-	-	-
26	-	-	-	45	-	-	-	1	2	-	-	-	-	-	-	-	-	-
27	-	-	-	1	-	-	-	-	1	-	-	-	-	-	-	-	-	-
28	-	-	-	15	11	-	1	3	1	-	-	-	-	-	13	1	3	-
29	-	-	-	69	6	-	-	1	1	-	-	-	-	-	-	1	-	-

Sighting Totals

	EleM	Kudu	Camp	Catt	Shoa	Donk	Dkr	Vill	Sett	Fire	Bpig	Bab	Ghbl	Eltk	Hipo	Croc	Pig	Gbk
	1	1	1	670	307	15	53	24	53	2	1	6	6	7	13	2	3	2

Date of Survey : 20/10/10
Stratum Locality : Cabora Bassa
Stratum Area : 741 km^2
N : 80 n : 21
Pilot : B. Eygabroad
Map overlay file : None

Stratum Name : Mphende
Base Line Length : 41.3 km
Calibrated Strip Width at 300ft : 457 m
t : 2.086
Observer : G.Nyaguse D.Chipesi

Transect summary table :

T #	EleF	Kudu	Hipo	Catt	Shoa	Donk	Fish	Whog	Bbk	Vill	Sett	Dkr	Croc	Fire	Eltk	Snar
1	-	-	7	-	-	-	1	-	-	-	-	-	-	-	-	-
2	-	-	-	-	-	-	1	3	3	-	-	-	-	-	-	-
3	12	-	-	-	-	-	-	-	2	-	1	-	-	-	-	-
4	-	-	6	-	-	-	4	-	-	-	-	1	-	-	-	-
5	4	-	6	-	-	-	2	-	-	-	-	-	-	-	-	-
6	-	-	-	-	-	-	1	-	1	-	-	1	1	-	-	1
7	-	-	-	-	-	-	-	5	1	-	-	1	-	-	-	-
8	-	4	14	-	-	-	-	-	-	1	-	-	-	2	1	-
9	-	-	-	-	-	-	1	-	-	1	2	-	-	1	1	-
10	-	-	8	-	-	-	-	-	1	-	-	1	-	-	1	-
11	-	-	1	-	-	-	-	-	-	-	-	1	-	-	-	1
12	-	4	-	22	-	-	-	-	-	1	1	1	-	-	-	-
13	-	-	-	6	-	-	-	-	-	1	3	1	-	-	-	-
14	-	-	-	12	40	-	-	-	-	2	3	-	-	-	-	-
15	-	-	-	17	10	-	-	-	-	3	3	5	-	-	-	-
16	-	-	-	26	-	-	-	-	-	-	3	-	-	-	-	-
17	-	-	-	26	4	-	-	-	-	2	3	-	-	-	1	-
18	-	-	-	-	-	-	-	-	-	-	5	1	-	-	-	-
19	-	-	-	-	-	-	-	-	-	-	5	-	-	-	-	-
20	-	-	-	-	-	4	1	-	-	1	7	3	-	-	-	-
21	-	-	-	-	9	-	1	-	-	2	-	1	-	-	-	-

Sighting Totals

	EleF	Kudu	Hipo	Catt	Shoa	Donk	Fish	Whog	Bbk	Vill	Sett	Dkr	Croc	Fire	Eltk	Snar
	16	8	42	109	63	4	12	8	8	14	36	17	1	3	4	2

Date of Survey : 22/10/10
Stratum Locality : Cabora Bassa
Stratum Area : 793 km^2
N : 81 n : 21
Pilot : B. Eygabroad
Map overlay file : None

Stratum Name : Mukumbura 3
Base Line Length : 41.3 km
Calibrated Strip Width at 300ft : 457 m
t : 2.086
Observer : G.Nyaguse D.Chipesi

Transect summary table :

T #	EleM	EleF	Kudu	EIC4	Whog	Dkr	Eltk	Ghbl	Bab	Fire	Sett
1	-	-	3	-	1	3	-	-	-	-	-
2	-	-	-	-	-	6	2	-	-	-	-
3	-	-	-	-	-	7	-	-	-	-	-
4	-	6	-	-	-	5	1	-	-	-	-
5	-	-	9	-	-	3	-	-	-	-	-
6	-	-	-	-	-	6	-	-	-	-	-
7	-	-	-	-	-	3	1	-	-	-	-
8	1	-	-	-	-	6	1	-	-	-	-
9	-	-	-	-	-	8	1	-	-	-	-
10	-	-	-	-	-	3	1	2	-	-	-
11	-	-	-	-	-	1	-	-	-	-	-
12	-	-	1	1	-	7	-	-	-	-	-
13	-	-	-	-	-	2	-	-	-	-	-
14	-	-	-	-	-	5	1	-	1	-	-
15	-	-	-	-	-	-	-	-	-	-	-
16	-	-	-	-	-	3	-	-	-	2	-
17	-	-	-	-	-	1	1	-	-	-	-
18	-	-	-	-	-	3	-	-	-	-	-
19	-	-	-	-	-	10	1	-	-	-	-
20	-	-	-	-	-	5	-	-	-	-	2
21	-	-	-	-	-	5	-	-	-	-	-

Sighting Totals

	EleM	EleF	Kudu	EIC4	Whog	Dkr	Eltk	Ghbl	Bab	Fire	Sett
	1	6	13	1	1	92	10	2	1	2	2

Date of Survey : 23/10/10
Stratum Locality : Cabora Bassa
Stratum Area : 742 km^2
N : 79 n : 19
Pilot : B. Eygabroad
Map overlay file : None

Stratum Name : Mukumbura 4
Base Line Length : 41.3 km
Calibrated Strip Width at 300ft : 457 m
t : 2.101
Observer : G.Nyaguse D.Chipesi

Transect summary table :

T #	Catt	Shoa	Donk	Dkr	Bab	Wat	Sett	Gbk	Eltk	Vill	Ghbl	Pig	Whog	Log	EIC3
1	-	-	-	2	6	1	-	-	-	-	-	-	-	-	-
2	-	-	-	2	-	4	2	-	-	-	-	-	-	-	-
3	-	-	-	3	-	5	1	-	-	-	-	-	-	-	-
4	16	11	-	4	-	-	1	1	1	-	-	-	-	-	1
5	-	-	-	7	-	-	4	-	-	-	-	-	-	-	-
6	7	47	-	2	-	-	2	-	2	1	-	-	-	-	-
7	25	16	-	6	-	-	1	-	-	-	5	-	-	-	-
8	7	17	-	5	-	-	2	-	1	2	-	-	-	-	-
9	-	-	-	3	-	-	4	-	1	1	-	-	-	-	-
10	13	25	-	1	-	-	6	-	1	1	-	-	-	-	-
11	55	-	-	5	-	-	10	-	1	1	-	3	-	-	-
12	105	23	-	4	-	-	8	-	-	3	-	6	2	-	-
13	107	52	-	3	-	-	16	-	-	5	-	4	-	-	-
14	36	54	-	3	-	-	11	-	-	-	-	-	-	1	-
15	67	-	4	3	-	-	6	-	-	2	-	-	-	-	-
16	169	43	-	2	-	-	5	-	-	3	-	2	-	-	-
17	100	-	-	2	-	-	3	-	-	2	-	5	-	-	-
18	45	19	-	1	-	-	6	-	-	2	-	8	-	-	-
19	16	23	4	1	-	-	7	-	-	-	-	-	-	-	-

Sighting Totals

	Catt	Shoa	Donk	Dkr	Bab	Wat	Sett	Gbk	Eltk	Vill	Ghbl	Pig	Whog	Log	EIC3
	768	330	8	59	6	10	95	1	7	23	5	28	2	1	1

Date of Survey : 25/10/10
Stratum Locality : Cabora Bassa
Stratum Area : 877 km^2
N : 102 n : 26
Pilot : B. Eygabroad
Map overlay file : None

Stratum Name : Chintholo 2
Base Line Length : 52.7 km
Calibrated Strip Width at 300ft : 457 m
t : 2.06
Observer : G Nyaguse D.Chipesi

Transect summary table :

T #	Kudu	Camp	Catt	Shoa	Donk	Dkr	Sett	Wat	Eltk	Bab	Vill	Fire	Ghbl
1	-	-	32	-	4	4	4	8	1	-	-	-	-
2	-	-	28	-	-	1	6	6	-	7	-	-	-
3	-	-	6	10	-	1	7	11	1	-	-	-	-
4	-	1	24	-	-	-	4	2	1	-	-	-	-
5	-	-	-	24	-	2	14	2	-	-	-	-	-
6	-	-	40	13	2	2	12	2	-	-	1	-	-
7	-	-	44	-	2	1	10	6	-	-	-	1	-
8	-	-	34	8	5	1	14	4	-	-	-	-	-
9	-	-	66	-	-	3	18	12	-	-	1	-	2
10	1	-	82	61	9	4	10	6	-	-	2	-	3
11	-	-	25	42	-	2	9	8	-	-	1	-	-
12	-	-	43	19	-	-	18	5	-	-	-	-	-
13	-	-	67	20	-	1	12	5	-	-	3	-	-
14	-	-	34	16	3	3	11	8	-	-	-	-	-
15	-	-	58	13	-	-	19	11	-	-	-	-	-
16	-	-	63	44	-	4	5	3	-	-	5	-	-
17	-	-	55	37	-	-	7	3	-	-	1	-	-
18	-	-	94	59	-	3	11	1	-	-	-	-	-
19	-	-	32	11	2	2	9	2	-	-	5	-	-
20	-	-	67	19	-	3	5	3	-	-	4	-	-
21	-	-	-	7	-	-	5	3	-	-	-	-	-
22	-	-	36	-	-	4	1	3	-	-	1	-	-
23	-	-	85	7	-	1	-	-	-	-	-	-	-
24	-	-	23	-	-	-	-	-	-	-	3	-	-
25	-	-	71	8	-	-	2	-	-	-	-	-	-
26	-	-	24	31	2	1	-	-	-	-	2	-	-

Sighting Totals

	Kudu	Camp	Catt	Shoa	Donk	Dkr	Sett	Wat	Eltk	Bab	Vill	Fire	Ghbl
	1	1	1133	449	29	43	213	114	3	7	29	1	5

Date of Survey : 27/10/10
Stratum Locality : Cabora Bassa
Stratum Area : 549 km^2
N : 72 n : 20
Pilot : B. Eygabroad
Map overlay file : None

Stratum Name : Chitima 1
Base Line Length : 39.2 km
Calibrated Strip Width at 300ft : 457 m
t : 2.093
Observer : G.Nyaguse D.Chipesi

Transect summary table :

T #	EleM	Hipo	Catt	Shoa	Donk	Dkr	Vill	Sett	Eltk	Log	Fish	Kap	Pig	Bpig
1	1	-	-	-	-	1	-	7	2	3	1	-	-	-
2	-	-	15	12	-	-	-	10	3	2	-	-	-	-
3	-	-	33	35	-	1	-	3	2	1	1	-	-	-
4	-	-	40	4	-	1	2	3	-	-	-	-	-	-
5	-	-	54	53	-	-	-	2	1	-	1	-	-	-
6	-	-	21	-	-	-	-	1	-	-	2	1	-	-
7	-	8	-	-	-	-	-	3	2	1	1	-	-	-
8	-	-	12	-	-	-	-	4	-	1	4	-	-	-
9	-	-	10	17	8	1	2	4	1	-	2	-	3	-
10	-	-	-	5	-	-	2	6	-	-	4	-	-	3
11	-	5	-	32	5	-	1	1	-	-	7	2	-	-
12	-	-	45	-	-	-	-	-	-	-	1	-	-	-
13	-	-	12	6	32	-	2	4	-	-	1	-	-	-
14	-	-	1	60	-	-	-	5	-	-	-	-	-	-
15	-	-	-	-	-	-	-	3	-	-	3	-	-	-
16	-	-	-	60	-	-	1	2	-	-	-	-	-	-
17	-	8	1	-	6	-	-	3	-	-	1	-	-	-
18	-	3	-	-	-	-	-	1	-	-	-	-	-	-
19	-	-	-	-	-	-	-	-	-	-	-	-	-	-
20	-	-	-	-	-	-	-	-	1	-	2	-	-	-

Sighting Totals

	EleM	Hipo	Catt	Shoa	Donk	Dkr	Vill	Sett	Eltk	Log	Fish	Kap	Pig	Bpig
	1	24	244	284	51	4	10	62	12	8	31	3	3	3

Date of Survey : 25/10/10
Stratum Locality : Cabora Bassa
Stratum Area : 515 km^2
N : 45 n : 11
Pilot : B. Eygabroad
Map overlay file : None

Stratum Name : Chitima 3
Base Line Length : 23.3 km
Calibrated Strip Width at 300ft : 457 m
t : 2.228
Observer : G.Nyaguse D.Chipesi

Transect summary table :

T #	EleF	EIC4	Shoa	Donk	Dkr	Sett	Eltk	Log	Ghbl	Vill	Wat	Bab
1	-	1	-	-	1	1	1	-	-	-	-	-
2	-	-	14	-	1	2	-	1	-	-	-	-
3	-	-	-	-	3	4	2	-	-	-	-	-
4	-	-	-	1	1	6	2	-	-	-	-	-
5	-	-	-	-	-	6	2	-	-	-	-	-
6	-	-	-	-	1	-	3	-	4	-	-	-
7	-	-	-	-	2	-	6	1	-	-	-	-
8	6	-	-	-	-	2	-	-	-	2	2	-
9	17	-	-	-	4	-	5	-	-	-	5	6
10	-	-	-	-	2	-	1	-	-	-	5	-
11	-	-	-	-	1	1	-	-	-	-	8	-

Sighting Totals

	EleF	EIC4	Shoa	Donk	Dkr	Sett	Eltk	Log	Ghbl	Vill	Wat	Bab
	23	1	14	1	16	22	22	2	4	2	20	6

Date of Survey : 26/10/10
Stratum Locality : Cabora Bassa
Stratum Area : 555 km^2
N : 44 n : 11
Pilot : B. Eygabroad
Map overlay file : None

Stratum Name : Chitima 4
Base Line Length : 23.3 km
Calibrated Strip Width at 300ft : 457 m
t : 2.228
Observer : G.Nyaguse D.Chipesi

Transect summary table :

T #	Shoa	Dkr	Eltk	Bpig	Log	Fire	Ghbl	Wat	Vill	Sett
1	-	2	3	-	-	-	-	-	-	-
2	-	5	5	-	-	-	-	-	-	-
3	-	2	3	-	-	-	-	-	-	-
4	-	-	4	2	1	-	-	-	-	-
5	-	-	3	-	1	-	-	-	-	-
6	-	2	2	-	-	1	-	-	-	-
7	-	-	2	-	-	-	2	-	-	-
8	-	2	-	-	-	-	-	2	-	6
9	7	1	-	-	1	-	-	2	1	5
10	-	1	1	-	2	1	-	2	-	2
11	-	-	-	-	-	-	-	3	-	-

Sighting Totals

	Shoa	Dkr	Eltk	Bpig	Log	Fire	Ghbl	Wat	Vill	Sett
	7	15	23	2	5	2	2	9	1	13

Date of Survey : 02/11/10
Stratum Locality : Cabora Bassa
Stratum Area : 706 km^2
N : 73 n : 21
Pilot : S. Rodger
Map overlay file : None

Stratum Name : Chintholo 1
Base Line Length : 41.9 km
Calibrated Strip Width at 300ft : 453 m
t : 2.086
Observer : G.Nyaguse D.Chipesi

Transect summary table :

T #	EleM	EleF	Buff	Kudu	EIC4	Wat	Dkr	Eltk	Whog	Bpig	Fire	Sett
1	-	-	-	-	-	2	-	-	-	-	-	-
2	-	-	40	-	-	4	2	1	-	-	-	-
3	-	-	-	-	-	1	2	-	-	-	-	-
4	-	-	-	-	-	1	-	1	-	-	-	-
5	-	12	-	2	-	-	-	-	-	-	-	-
6	-	-	-	-	-	-	-	1	-	-	-	-
7	2	-	-	-	-	1	-	-	-	-	-	-
8	-	-	-	2	-	4	-	-	-	-	-	-
9	-	-	-	-	-	1	-	-	-	-	-	-
10	-	-	-	-	-	1	1	1	5	-	-	-
11	-	7	-	-	-	-	1	-	-	2	-	-
12	-	-	-	-	-	-	-	-	-	-	-	-
13	-	-	-	-	-	4	1	-	-	-	-	-
14	-	-	1	-	-	6	-	1	-	-	2	-
15	-	-	-	-	-	2	-	-	-	-	-	-
16	-	-	-	-	-	4	-	-	-	-	1	-
17	-	5	-	-	-	4	-	-	-	-	-	1
18	-	-	-	-	-	3	-	-	-	-	-	-
19	-	-	-	-	-	6	-	1	-	-	-	-
20	-	-	-	-	1	6	1	1	-	-	-	-
21	-	-	-	5	-	6	1	1	-	-	-	-

Sighting Totals

	EleM	EleF	Buff	Kudu	EIC4	Wat	Dkr	Eltk	Whog	Bpig	Fire	Sett
	2	24	41	9	1	56	9	8	5	2	3	1

Date of Survey : 20/10/10
Stratum Locality : Cabora Bassa
Stratum Area : 1196 km^2
N : 109 n : 26
Pilot : B. Eygabroad
Map overlay file : None

Stratum Name : Chitima 2
Base Line Length : 52 km
Calibrated Strip Width at 300ft : 457 m
t : 2.06
Observer : G.Nyaguse D.Chipesi

Transect summary table :

T #	EleM	Kudu	EIC3	EIC4	Catt	Shoa	Donk	Dkr	Vill	Sett	Eltk	Pig	Fire	Log	Bpig	Wat
1	-	-	-	-	38	6	4	1	2	2	2	-	-	-	-	-
2	-	-	1	-	31	12	-	-	2	-	3	1	-	-	-	-
3	-	-	-	-	-	-	-	2	-	-	7	-	-	-	-	-
4	-	-	-	-	-	-	-	1	-	2	3	-	-	-	-	-
5	-	-	-	1	8	-	-	2	-	5	5	-	-	-	-	-
6	-	-	-	-	-	-	-	5	-	18	4	-	2	-	-	-
7	-	-	-	-	4	-	-	2	-	21	3	-	1	-	-	-
8	-	-	-	-	-	-	-	-	2	9	5	-	1	-	-	-
9	-	-	-	-	6	-	3	5	-	3	4	-	-	-	-	-
10	1	-	-	-	-	10	-	-	-	7	4	-	-	4	-	1
11	-	-	-	-	-	-	-	2	-	6	8	-	-	1	-	-
12	-	-	-	-	-	-	-	1	-	2	2	-	2	1	-	-
13	-	-	-	-	-	-	-	3	-	2	2	-	-	1	-	-
14	-	-	-	-	-	-	-	1	-	-	-	-	-	1	-	-
15	-	-	-	-	-	-	-	2	-	-	-	-	-	-	-	-
16	-	-	-	-	-	-	-	2	-	-	-	-	-	-	-	-
17	-	3	-	-	-	-	-	1	-	-	3	-	-	-	-	-
18	-	-	-	-	-	-	-	2	-	-	-	-	-	-	-	-
19	-	-	-	-	-	-	-	1	-	1	1	-	-	1	-	-
20	-	-	-	-	-	-	-	1	-	-	3	-	-	-	-	-
21	-	-	-	-	-	-	-	4	-	-	3	-	-	-	-	-
22	-	-	-	-	-	-	-	6	-	-	5	-	-	-	-	-
23	-	-	-	1	-	-	-	2	-	-	2	-	-	-	-	-
24	-	-	-	-	-	5	1	3	3	-	5	-	-	-	-	-
25	-	-	-	-	3	21	10	4	3	3	1	-	-	-	1	-
26	-	-	-	-	-	6	-	-	1	8	-	-	2	-	-	-

Sighting Totals

	EleM	Kudu	EIC3	EIC4	Catt	Shoa	Donk	Dkr	Vill	Sett	Eltk	Pig	Fire	Log	Bpig	Wat
	1	3	1	2	90	60	18	53	13	89	75	1	8	9	1	1

Date of Survey : 19/10/10
Stratum Locality : Cabora Bassa
Stratum Area : 695 km^2
N : 83 n : 19
Pilot : B. Eygabroad
Map overlay file : None

Stratum Name : Kachembe
Base Line Length : 39.5 km
Calibrated Strip Width at 300ft : 457 m
t : 2.101
Observer : G.Nyaguse D.Chipesi

Transect summary table :

T #	EIC4	Camp	Catt	Shoa	Donk	Vill	Sett	Dkr	Eltk	Fire	Gbk	Pig	Log	Ghbl	Wat
1	-	-	-	-	-	-	3	-	-	-	-	-	-	-	-
2	-	-	-	-	-	-	5	-	-	-	-	-	-	-	-
3	-	-	5	11	-	-	6	-	-	-	-	-	-	-	-
4	-	-	20	-	5	-	6	1	-	-	-	-	-	-	-
5	-	-	3	4	-	-	9	-	-	-	-	-	-	-	-
6	-	-	9	6	-	-	7	-	-	-	-	-	-	-	-
7	-	-	24	13	-	2	7	1	-	-	-	-	-	-	-
8	-	-	3	-	-	1	3	-	-	-	-	-	-	-	-
9	-	-	12	-	-	-	3	1	-	-	-	-	-	-	-
10	-	-	8	-	-	1	2	-	-	-	-	-	-	-	-
11	-	-	-	-	-	-	-	1	-	-	-	-	-	-	-
12	1	-	-	-	-	-	-	-	-	-	-	-	-	-	-
13	-	-	-	-	-	-	1	-	1	-	-	-	-	-	-
14	-	-	-	6	-	-	4	1	1	1	-	-	-	-	-
15	-	-	-	-	-	2	5	7	-	-	-	-	-	-	-
16	-	-	6	17	-	3	12	2	-	-	1	-	-	-	-
17	-	-	26	30	-	2	13	6	5	-	-	3	-	3	-
18	-	1	1	16	-	-	6	4	3	-	-	-	1	-	1
19	-	-	-	3	-	-	9	19	1	-	-	4	1	-	-

Sighting Totals

	EIC4	Camp	Catt	Shoa	Donk	Vill	Sett	Dkr	Eltk	Fire	Gbk	Pig	Log	Ghbl	Wat
	1	1	117	106	5	11	101	43	11	1	1	7	2	3	1

Date of Survey : 01/11/10
Stratum Locality : Cabora Bassa
Stratum Area : 1253 km^2
N : 113 n : 28
Pilot : S. Rodger
Map overlay file : None

Stratum Name : Chintholo 3
Base Line Length : 57.1 km
Calibrated Strip Width at 300ft : 453 m
t : 2.052
Observer : G.Nyaguse D.Chipesi

Transect summary table ;

T #	Kudu	Catt	Shoa	Dkr	Sett	Wat	Bab	Fire	Log	Eltk	Ghbl	Vill	Donk
1	3	-	-	1	1	1	-	-	-	-	-	-	4
2	-	-	-	-	-	2	6	1	-	-	-	-	-
3	-	-	14	3	3	4	-	1	2	-	-	-	-
4	-	-	1	2	2	7	-	1	-	-	-	-	-
5	-	-	-	2	-	1	-	-	2	1	-	-	-
6	-	-	-	1	2	1	-	1	-	-	-	-	-
7	-	-	-	5	-	-	-	-	1	1	-	-	-
8	-	-	-	2	-	2	-	-	2	5	-	-	-
9	8	-	-	12	-	-	-	-	5	4	-	-	-
10	4	-	-	7	-	-	-	-	2	4	-	-	-
11	2	-	-	5	-	-	-	-	1	2	-	-	-
12	-	-	-	2	-	-	-	-	4	3	-	-	-
13	-	-	-	5	-	-	-	-	1	4	-	-	-
14	-	-	-	5	-	-	-	-	-	3	-	-	-
15	3	-	-	4	-	-	-	-	1	5	-	-	-
16	-	-	-	3	-	-	-	-	-	5	-	-	-
17	-	-	-	3	-	-	-	-	2	2	-	-	-
18	-	6	8	3	2	-	-	2	3	6	3	-	-
19	-	-	52	2	3	-	-	-	-	4	-	-	-
20	-	-	-	5	4	-	-	-	2	6	-	-	-
21	-	-	-	2	6	-	-	-	2	1	-	-	-
22	-	32	93	2	7	-	-	-	2	2	-	1	-
23	-	-	14	1	8	-	-	-	-	2	-	-	-
24	-	-	50	1	2	1	-	-	1	2	-	1	-
25	-	-	-	3	3	-	-	-	3	-	-	-	-
26	-	-	7	-	5	-	-	-	-	2	-	-	-
27	-	30	-	-	1	-	-	-	3	3	-	-	-
28	-	1	-	1	2	-	-	-	2	1	-	-	-

Sighting Totals

	Kudu	Catt	Shoa	Dkr	Sett	Wat	Bab	Fire	Log	Eltk	Ghbl	Vill	Donk
	28	69	239	82	51	19	6	6	41	68	3	2	4

Date of Survey : 26/10/10
Stratum Locality : Cabora Bassa
Stratum Area : 944 km^2
N : 87 n : 23
Pilot : B. Eygabroad
Map overlay file : None

Stratum Name : Chintholo 4
Base Line Length : 46.6 km
Calibrated Strip Width at 300ft : 457 m
t : 2.074
Observer : G.Nyaguse D.Chipesi

Transect summary table :

T #	EIC4	Catt	Shoa	Donk	Dkr	Eltk	Sett	Wat	Ghbl	Vill	Croc	Whog	Log
1	-	51	6	-	1	2	5	3	-	-	-	-	-
2	-	-	21	-	-	1	6	4	3	-	-	-	-
3	-	-	27	-	2	1	4	-	-	1	-	-	-
4	1	7	-	-	4	-	5	4	1	-	1	-	-
5	-	14	-	-	1	-	7	6	-	-	-	1	-
6	-	-	16	-	3	-	3	3	-	-	-	-	-
7	-	3	-	-	1	-	3	7	-	-	-	3	-
8	-	4	-	-	3	-	2	10	-	-	-	-	-
9	-	7	39	-	4	-	6	8	-	1	-	-	-
10	1	-	-	-	7	2	3	2	-	-	-	-	-
11	-	-	4	-	1	1	2	-	-	-	-	2	-
12	-	-	-	-	1	1	1	3	-	-	-	-	-
13	-	-	-	-	-	1	3	1	-	-	-	-	-
14	-	-	-	-	-	-	4	1	1	-	-	-	-
15	-	-	-	-	2	-	4	1	-	-	-	-	-
16	-	-	-	-	3	-	4	1	-	-	-	-	-
17	-	-	8	-	-	2	5	2	-	1	-	-	-
18	-	-	-	-	-	-	-	2	-	-	-	-	-
19	-	5	-	-	1	-	4	1	-	-	-	-	2
20	-	-	-	-	2	-	2	2	-	-	-	-	1
21	-	-	-	-	2	-	2	-	-	-	-	-	-
22	-	-	-	-	-	-	-	1	-	-	-	-	-
23	-	-	-	3	2	-	-	1	-	-	-	-	2

Sighting Totals

	EIC4	Catt	Shoa	Donk	Dkr	Eltk	Sett	Wat	Ghbl	Vill	Croc	Whog	Log
	2	91	121	3	40	11	75	63	5	3	1	6	5

Date of Survey : 01/11/10
Stratum Locality : Cabora Bassa
Stratum Area : 1415 km^2
N : 103 n : 27
Pilot : S. Rodger
Map overlay file : None

Stratum Name : Chipembere
Base Line Length : 54.3 km
Calibrated Strip Width at 300ft : 453 m
t : 2.056
Observer : G.Nyaguse D.Chipesi

Transect summary table :

T #	EleM	EleF	Kudu	EIC4	Catt	Shoa	Donk	Dkr	Wat	Log	Eltk	Sett	Vill	Fire	Ghbl
1	-	-	-	-	-	-	-	2	1	4	-	-	-	-	-
2	-	-	-	-	-	-	-	-	1	5	2	-	-	-	-
3	-	-	-	-	-	-	-	1	-	2	3	2	-	-	-
4	5	9	-	-	-	-	-	-	-	1	2	2	1	-	-
5	-	-	-	-	-	5	-	9	-	-	1	2	3	-	-
6	1	-	-	-	-	35	-	2	-	-	1	-	2	1	-
7	-	-	1	-	1	26	-	6	-	-	5	1	1	-	1
8	-	-	-	-	-	-	-	4	-	-	2	1	-	-	-
9	-	-	-	-	-	-	-	4	-	5	3	-	-	-	-
10	-	-	-	1	-	-	-	3	-	6	2	-	-	-	-
11	2	-	-	1	1	-	-	4	-	1	1	-	-	-	-
12	-	12	-	-	-	-	-	1	-	-	4	-	-	-	-
13	1	-	-	-	-	-	-	1	-	-	1	2	-	-	-
14	-	-	-	-	3	5	-	1	-	1	2	1	1	-	-
15	-	3	-	-	-	-	-	2	-	4	2	6	-	-	-
16	-	-	-	-	32	-	-	-	-	5	5	6	-	-	-
17	-	-	-	-	30	24	-	2	-	6	2	3	3	-	-
18	-	-	-	-	43	70	-	1	-	10	-	4	-	-	1
19	-	-	-	-	38	45	-	2	3	13	1	3	2	-	-
20	-	-	-	-	60	11	-	1	1	8	-	7	-	-	-
21	-	-	-	-	61	28	1	-	2	9	-	5	2	-	-
22	-	-	-	-	69	24	-	-	-	-	-	3	1	-	2
23	-	-	-	-	70	93	-	-	4	6	-	5	-	-	-
24	-	-	-	-	29	25	-	-	-	4	-	4	1	-	-
25	-	-	-	-	120	41	-	-	2	-	-	4	3	-	-
26	-	-	-	-	35	133	-	1	2	-	-	-	3	-	-
27	-	-	-	-	37	71	6	-	1	-	-	-	-	-	-

Sighting Totals

	EleM	EleF	Kudu	EIC4	Catt	Shoa	Donk	Dkr	Wat	Log	Eltk	Sett	Vill	Fire	Ghbl
	9	24	1	2	629	636	7	47	17	90	39	61	23	1	4

Date of Survey : 02/11/10
Stratum Locality : Cabora Bassa
Stratum Area : 938 km^2
N : 168 n : 43
Pilot : S. Rodger
Map overlay file : None

Stratum Name : Luenha
Base Line Length : 85.7 km
Calibrated Strip Width at 300ft : 453 m
t : 2.018
Observer : G.Nyaguse D.Chipesi

Transect summary table :

T #	Catt	Shoa	Sett	Wat	Vill	Dkr	Log	Fire	Bab	Eltk
1	-	-	1	1	-	-	-	-	-	-
2	76	18	-	-	2	-	-	-	-	-
3	23	33	-	1	1	1	-	-	-	-
4	30	58	-	1	2	-	-	-	-	-
5	47	31	-	-	2	2	2	-	-	-
6	47	-	-	1	-	1	-	-	-	-
7	81	43	-	-	-	-	4	-	-	-
8	17	25	-	-	1	-	2	-	-	-
9	33	-	6	-	-	1	9	-	-	-
10	2	-	7	-	-	1	3	-	-	-
11	-	-	9	-	-	-	1	-	-	-
12	13	4	6	-	-	-	1	1	-	-
13	17	-	8	-	1	-	-	-	-	-
14	17	-	7	-	-	-	1	-	-	-
15	16	57	-	-	1	-	-	-	-	-
16	-	-	-	-	-	-	-	-	-	-
17	-	-	1	-	-	-	6	-	-	-
18	3	-	5	-	-	-	2	-	-	-
19	-	-	7	2	-	-	-	-	-	-
20	1	8	3	2	-	-	-	-	-	-
21	22	44	6	2	-	-	-	-	-	-
22	-	40	3	1	1	-	-	-	-	-
23	-	-	3	1	-	-	-	-	-	-
24	-	-	2	1	-	1	-	-	-	-
25	-	-	1	2	-	-	1	-	-	2
26	-	-	1	2	-	-	2	-	-	-
27	-	-	-	2	-	1	4	-	-	-
28	-	-	-	-	-	4	2	-	-	-
29	-	-	-	1	-	-	1	-	7	-
30	-	-	-	2	-	-	1	-	-	-
31	-	-	-	2	-	-	1	-	-	-
32	-	-	1	1	-	-	1	-	-	-
33	-	-	-	2	-	-	2	-	-	-
34	-	-	-	1	-	-	2	-	-	-
35	-	-	-	-	-	1	1	-	-	-
36	-	-	-	1	-	-	-	-	-	-
37	-	-	1	1	-	-	-	-	-	-
38	46	46	7	2	-	-	-	-	-	-
39	13	-	-	1	-	-	-	-	-	-
40	-	-	-	-	-	-	-	-	-	-
41	6	-	-	1	-	-	-	-	-	-
42	14	-	-	-	-	-	-	-	-	-
43	12	22	-	1	-	-	-	-	-	-

Sighting Totals

	Catt	Shoa	Sett	Wat	Vill	Dkr	Log	Fire	Bab	Eltk
	536	429	85	35	11	13	49	1	7	2

Conf. 2.11 (Rev.)*

Trade in hunting trophies of species listed in Appendix I

CONSIDERING the need of uniform interpretation of the Convention with regard to hunting trophies;

THE CONFERENCE OF THE PARTIES TO THE CONVENTION

RECOMMENDS that:

a) with the exception of the rare case of exemptions granted under paragraph 3 of Article VII of the Convention, trade in hunting trophies of animals of the species listed in Appendix I be permitted only in accordance with Article III, i.e. accompanied by import and export permits;

b) in order to achieve the envisaged complementary control of trade in Appendix-I species by the importing and exporting countries in the most effective and comprehensive manner, the Scientific Authority of the importing country accept the finding of the Scientific Authority of the exporting country that the exportation of the hunting trophy is not detrimental to the survival of the species, unless there are scientific or management data to indicate otherwise; and

c) the scientific examination by the importing country in accordance with paragraph 3 (a) of Article III of the Convention be carried out independently of the result of the scientific assessment by the exporting country in accordance with paragraph 2 (a) of Article III, and vice versa.

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* *Amended at the ninth meeting of the Conference of the Parties.*

Interpretation and Implementation of the Convention

TRADE IN HUNTING TROPHIES OF SPECIES LISTED IN APPENDIX I

This document has been prepared and submitted by Namibia.

Background

In 1979, the CITES Parties adopted Resolution Conf. 2.11 (Annex 1), dealing with the international shipment of sport hunting trophies of species listed in Appendix I. According to its sponsors, the purpose of the Resolution was to correct the "differing procedures [for] the granting of permits for the trade in hunting trophies of Appendix–I species." [Doc. 2.13 (Rev.)]. Instead it has caused further confusion, expense and delay.

In the fifteen years since the adoption of Resolution Conf. 2.11, it has become recognized practice for some countries to allow, indeed encourage, the hunting of a limited number of Appendix–I species and to allow the exportation of the hunting trophies. This is called "tourist safari hunting", and it is an important component of the conservation regimes of a number of countries. In some cases, such as for leopards and cheetahs, the Conference of the Parties has established export quotas for trade in the resulting trophies.

Despite the importance of this activity to the conservation programmes of some range States, there is still a wide discrepancy in the practice of importing countries. Some countries, using Resolution Conf. 2.11, recommendation c), as their rationale, have refused to allow imports of hunting trophies whose exports has been approved by the range State, even when on quota. In many cases this is done without consultation, contrary to the meaning and spirit of Resolution Conf. 6.7. The result of these actions by importing countries has been to harm the conservation programmes of the range States.

Importance of this Proposal to Species Conservation and Biodiversity

Tourist safari hunting is a low–risk form of sustainable use of wildlife. The sustainable use of wildlife which is associated with benefits flowing to the local people has been recognized and endorsed by IUCN. At both its eighteenth and nineteenth General Assemblies, IUCN adopted resolutions confirming the benefits of this concept to the conservation of biodiversity.

Many countries, particularly in Africa, have begun to implement conservation programmes with sustainable use components. These include tourist safari hunting as one of the principal means of conserving wildlife beyond the borders of protected areas. It is a cost–effective method of providing incentives for conservation and needed revenue at little cost to the range State. It is an important option in unprotected areas, where most wildlife exists and where there are few other conservation tools.

The Nature of Tourist Safari Hunting

Few activities are taxed, licensed, levied and monitored on such an individualized basis as tourist hunting. The use of wildlife through tourist safari hunting is easy to regulate and the relevant authorities are motivated to regulate it because of the foreign exchange it provides per unit of effort. Each individual hunter is licensed, as is generally his guide, and permits are required for each separate animal taken. Limited permits are granted on an individual basis. The biological and ecological risk or impact of tourist safari hunting is virtually non–existent because of its low volume and the select characteristics of the trophy being sought. The export of the trophy is likewise easy to control. The trophy is marked and the shipment is accompanied by export documentation. All of these matters are best governed and determined by the range State to which the hunted species is indigenous and which is in the best position and has the greatest interest.

The benefits of tourist safari hunting are high, especially when compared to both the ecological and development costs. The land on which such hunting occurs is often marginal land, and may not otherwise have marketable scenic value. The use of the area by hunting outfitters and hunters may represent the only economic value of any significance associated with that land in its wild state. Tourist safari hunting in such cases should not be made burdensome but should be facilitated.

Anti–poaching effectiveness and biological monitoring is also increased because of the tourist hunting presence and government game scouts that normally accompany the hunting parties into the field, at the hunter's expense. The presence of tourist hunters brings needed income to the people living in the rural areas where the hunting occurs, as well as revenue and incentive to the governing authorities.

The Problems with the Application of Resolution Conf. 2.11, Recommendation c)

The basic mechanism of CITES is an international permit system in which the exporting country issues an export permit based on its finding that the export will not be detrimental to the survival of the species. For the Appendix–I specimens, the importing country must also issue a permit for each transaction. The issuance of the import permit is based on a finding by the importing country that the purpose of the import will not be detrimental to the survival of the species. Thus each Appendix–I shipment requires two complementary but different permits based upon different determinations, one from the exporting country and one from the importing country. The Convention does not require each of the + 123 importing States to redetermine the finding made by the exporting State. Neither does it require the importing State to make a greater determination than the exporting State.

The Convention specifically assigns to each country a different role — the exporting country considers the impact of the removal of the animal from that country's wild population and the importing country considers the purpose of the import. This dual–permit system provides protection to Appendix–I species by assuring that each side of the transaction undertakes that task for which it is best suited. The exporting country is in the best position to determine the effect on the status of the wild population from which the specimen comes, the nature of its taking and the preparation of the specimen for export. The importing country, on the other hand, is best suited to determine the purpose or use of the import, since the importer and the use to which he intends to put it lie within its borders.

Some importing countries have used Resolution Conf. 2.11, recommendation c), as a basis for replacing the system specified in the Convention with their own requirements in which the importing country makes the judgements that CITES allocates to the exporting country. They have also replaced the CITES non-detriment standard with their own greater "enhancement" standard. The effect of this, whether intended or not, is that the importing countries are saying to the exporting Parties, "We do not trust your judgements, and we insist on replacing your views with our own". This patronizing approach is inappropriate for sovereign States in

a conservation partnership. In most cases, this is being done without even consulting with the exporting Parties. Import permits are being denied by importing authorities automatically because they lack the interest, first–hand knowledge and expertise of the range State. Therefore, an insistence that "enhancement" is necessary really means that the importing country has been given a greater burden than the exporting country, which is in the best position to make such a finding, i.e. even exporting countries do not have to find that trade provides "enhancement". Further confusion arises out of the use of the term "enhancement" in Resolution Conf. 2.11 because it is not defined and of course the Convention does not define it because it is not contained in the Convention and was expressly rejected when the Convention was concluded. Whether or not an exporting State can have a successful conservation programme based in part upon tourist safari hunting has come to depend upon the arbitrary interpretation of "enhancement" which is being separately defined by each importing country and therefore impeding imports although it is not in the Convention in the first place.

There are numerous problems with this approach:

1. it falsely assumes that the importing country has superior knowledge and expertise on species that do not exist within its boundaries;
2. it is often implemented without consultation with the exporting countries that it affects;
3. it has had harmful effects on the conservation programmes of the exporting countries and is restrictive;
4. it calls for duplication of effort, as opposed to the clear assignment by CITES of roles that do not overlap;
5. it is an unnecessary burden considering the select, minuscule volume of animals affected by tourist safari hunting;
6. there are no benefits to this approach in regard to the conservation of species and biodiversity, but there are significant costs to the conservation programmes of range States and in many instances a complete impasse;
7. it is beyond the Convention, i.e. the Convention does not require proof of "enhancement" rather it requires a "non–detriment" determination;
8. it is beyond the Convention in that it requires the remotely located importing State to make a greater and more thorough determination than the exporting State where the activity takes place and the species occurs;
9. it is offensive to developing countries and implies mistrust and disrespect;
10. the success of conservation programmes should not be dependent upon meeting standards set by the wealthiest of developed nations; and
11. it compounds the problem for species that have been incorrectly listed in the appendices.

History

From the time the Convention was drafted it has been intended that the importing country is not to replicate the findings that the exporting country is to make about wildlife that occurs within the national borders of the exporting country and is "precious to them most particularly". The intent was to have duplicate permits that complemented each other, not duplicate findings. The importing authority must be satisfied that, among other requirements, the specimen will not be used for primarily commercial purposes. However, the importing country's finding does not require it to replicate the basic biological fact finding that is required of the exporting country. Inclusion of the word "purposes" in the finding required of the importing country indicates that the importing country's approach should differ and, in particular, that it should focus on the nature and quality of the activity in the importing country as it relates to species survival. The basic biological fact finding on Convention species is the responsibility of the exporting countries where the species occur in the wild.

On three separate occasions, attempts to require that the importing country replicate the findings of the exporting country and that enhancement or restoration be found by the importing country before trade in Appendix–I species is permitted have been rejected. Specifically, at the eighth plenary session of the Conference at which the Convention was signed (SR/8 Final– March 5,1973) it was expressly rejected when an amendment (PA/III/4) that would have required the importing authorities to find that the import "will be for the purpose which require the importing authorities to find that the import will be for the purpose which will further the restoration of the species..." and would "prohibit any trade...unless...the trade...will be for restoration purposes" was withdrawn. The delegates indicated that they would "let the export State do what is proper for the export State and let the import State do what is proper for the import State, and this would be in the spirit of the Convention."

The second time was at the third meeting of the Conference of the Parties when a proposed resolution attached to Scientific Authority Review of Applications for Importation of Appendix–I Specimens... document Doc. 3.27 was proposed, then withdrawn [see Plen. 3.7 (Rev.), item XIV 8, page 117] because of opposition from the Parties. It too was an attempt to have the remote importing State replicate the determination made by the exporting State authorities and would have limited imports to when their purpose "enhanced species survival".

Third and most recently, during a negotiating session at the 8th meeting of the Conference of the Parties, provisions in the Role of the Scientific Authority, document Doc. 8.37, which would have recommended that importing State authorities determine that the "activity is likely to enhance" the survival of the species, were rejected by the Parties and the terms of the Convention Articles were substituted in their place.

Both documents Doc. 3.27 and the rejected components of Doc. 8.37 cite outdated Resolution Conf. 2.11 as part of their basis. It is long past due to correct the source of the confusion by amending the misleading language in Resolution Conf. 2.11, recommendation c).

The Proposed Draft Resolution and the CITES System

The proposed draft resolution (Annex 2) modifies Resolution Conf. 2.11 to reinstate the system of double control specified in the Convention.

The recent negotiation of the Biodiversity Convention clearly recognized that co–operative action between countries is essential to the conservation of biological diversity. In the case of CITES, this co–operation must include the access to markets where those markets are an important component of conservation. The proposed draft resolution accomplishes that goal.

Note from the Secretariat

The Secretariat recognizes the merits of this document and the value of the argumentation presented. It is however conscious that, if the draft resolution in Annex 2 is adopted, this would not prevent some Parties from implementing stricter domestic measures on the import of hunting trophies, in accordance with Article XIV, paragraph 1.

Doc. 9.50 Annex 1

Conf. 2.11

Trade in Hunting Trophies of Species Listed in Appendix I

CONSIDERING the need of uniform interpretation of the Convention with regard to hunting trophies;

THE CONFERENCE OF THE PARTIES TO THE CONVENTION

RECOMMENDS

a) that with the exception of the rare case of exemptions granted under paragraph 3 of Article VII of the Convention, trade in hunting trophies of animals of the species listed in Appendix I be permitted only in accordance with Article III, i.e. accompanied by import and export permits;

b) that the scientific opinions under paragraphs 2 (a) and 3 (a) of Article III of the Convention cover the trade in dead specimens, too;

c) that in order to achieve the envisaged double control (also in the scientific field) by the importing and the exporting country of the trade in Appendix-I specimens, the Scientific Authority have the possibility of comprehensive examination concerning the question of whether the importation is serving a purpose which is not detrimental to the survival of the species. This examination should, if possible, also cover the question of whether the killing of the animals whose trophies are intended for import would enhance the survival of the species; and

d) that the scientific examination by the importing country in accordance with paragraph 3 (a) of Article III of the Convention be carried out independently of the result of the scientific assessment by the exporting country in accordance with paragraph 2 (a) of Article III, and vice versa.

Doc. 9.50 Annex 2

DRAFT RESOLUTION OF THE CONFERENCE OF THE PARTIES

Standard to be Applied to Trade in Lawfully Taken Hunting Trophies

RECALLING the Preamble to the Convention, which states that peoples and States are and should be the best protectors of their own wild fauna and flora;

REAFFIRMING the provisions of Articles III, IV and V of the Convention, which specifically require that different findings be made by exporting Parties and importing Parties, and which state that the condition for allowing the export of a specimen is that the State of export finds that there is no detriment to the survival of the species in the wild;

RECALLING Resolution Conf 8.3, adopted at the eighth meeting of the Conference of the Parties (Kyoto, 1992), recognizing the benefits of the use of wildlife;

THE CONFERENCE OF THE PARTIES TO THE CONVENTION

DECIDES to amend recommendation c) of Resolution Conf. 2.11 to read as follows:

c) that in order to achieve the envisaged complementary control of trade in Appendix-I species by the importing and exporting countries in the most effective and comprehensive manner, the Scientific Authority of the importing country accept the finding of the Scientific Authority of the exporting country as to whether or not the exportation of the hunting trophy is detrimental to the survival of the species, and limit its examination to the purpose to which the specimen will be put upon reaching the importing country and to whether it is the lawfully taken trophy it is purported to be.

CONSIDERATION OF PROPOSALS FOR AMENDMENT OF APPENDICES I AND II

Other Proposals

A. **Proposal**

Transfer of the Zimbabwe population of *Loxodonta africana* from Appendix I to Appendix II for the exclusive purposes of allowing:-

a)Direct export of registered stocks of whole raw tusks of ivory to one trading partner (Japan), subject to the following quotas:-

1998	1999
10 tonnes	10 tonnes

b) International trade in hunting trophies.

c) International trade in live animals to appropriate and acceptable destinations.

d) International trade in non-commercial shipments of leather articles and ivory carvings.

e) Export of hides

B. **Proponents**

This proposal was submitted by Botswana, Malawi, Namibia and Zimbabwe pursuant to Resolution Conf. 7.9 with precautionary measures in accordance with Resolution Conf. 9.4.

C. **Supporting Statement (6th January 1997)**

SUMMARY OF THE SUPPORTING STATEMENT

This proposal is designed to enhance sustainable conservation practices for elephant populations in Zimbabwe. Trade in ivory and other elephant products is not an end in itself, but a mechanism for ensuring that there are revenues and incentives for the conservation of elephant habitats, particularly for impoverished rural communities who live with elephants and who ultimately will decide if they survive or not.

The Zimbabwe population of the African elephant (*Loxodonta africana*) does not meet the biological criteria for listing on Appendix I as outlined in Resolution Conf. 9.24. Specifically, the wild population is large (over 60,000 animals) and steadily increasing. The majority of the animals are not found in small sub-populations, nor are they concentrated in one sub-population. The wild population does not have a restricted area of distribution nor is this area subject to fluctuation or fragmentation. The species is not vulnerable in Zimbabwe as past experience has shown.

The biggest threat to the survival of this species in Zimbabwe is not international trade, but loss of habitat and conflict with legitimate human interests. This is a situation which can only be alleviated by adding value to the animal, not taking it away. This supporting statement will show that it is important to transfer the elephant population of Zimbabwe to Appendix II to allow controlled trade in products because:-

- It is in the best interests of elephant conservation.
- It assists impoverished rural communities.
- It will support biodiversity conservation and wildlife management.
- There are strong political and economic imperatives for transfer.
- Transfer is necessary for enforcement and control.

These arguments are presented in full in the next section.

When the species was listed on Appendix I at C.O.P 7 it was noted that some southern African populations did not meet the criteria for inclusion in Appendix I. However, it is recognised that many other populations of *Loxodonta africana* did meet the criteria and still do and it is therefore appropriate to seek a transfer to Appendix II on the basis of a split listing.

This proposal is for the transfer of the Zimbabwe population of African elephant in order to clear stocks of ivory while at the same time allowing the continued export of trophies from recreational hunters, export of hide from management operations and the export of tourist curios. It is considered particularly notable that about 26% of the ivory stock held

by the Zimbabwe government(as of 31/10/96) belongs to rural communities managing their own wildlife under the [1]CAMPFIRE programme.

It must be noted that Zimbabwe has the legislation and capacity to manage a legal, well regulated trade in elephant products. Zimbabwe closely adheres to CITES and follows the recommendations of Resolution Conf. 9.16, including those on the registration of merchants, carvers and, additionally, retailers.

A range of relevant precautionary measures are included in this proposal to accompany the transfer of the Zimbabwe population to Appendix II.

These include:-

- Downlisting of the Zimbabwe population only .
- A pledge that Zimbabwe will withdraw its reservation within 90 days of acceptance of this proposal.
- An export quota is established for registered stocks of raw ivory only.
- Ivory will be marked with a standard durable system.
- Exports will not include confiscated ivory of unknown origin or which is known to be non-Zimbabwean.
- The transfer includes safeguards against abuse including a mechanism for rapid re-transfer to Appendix I.
- Sales and shipment will take place from one secure locality within Zimbabwe and will be open to full independent inspection.
- The number of shipments will be limited to one in each year.
- Shipments will be direct to the end using country.
- Japan has new internal legal controls for ivory trade and agrees not to re-export any of the ivory imported.
- All funds from ivory will be used for conservation purposes (they will be returned directly to the management Authority or to CAMPFIRE communities, depending on its origin).

Should the Standing Committee be made aware of abuses of the downlisting, or a failure of the Zimbabwe Management Authority or the importing Party to adhere to the terms of the proposal as agreed by the COP, the Depository (Swiss) Government has agreed to prepare a proposal for re-transfer to Appendix I to put before the Parties under the postal procedure of Article XV paragraph 2.

Rationale for the Zimbabwean Proposal

It is important to transfer the elephant population to Appendix II to allow controlled trade in products because:-

- **It is in the best interests of elephant conservation;**
- **It assists impoverished rural communities;**
- **It supports biodiversity conservation and general wildlife management;**
- **There are strong political and economic imperatives for transfer; and**
- **Transfer is necessary for enforcement and control;**

a) Transfer for elephant conservation

African elephants are in competition with man throughout southern Africa and, especially in arid and semi-arid areas where they range widely, protected areas are inadequate to ensure the survival of elephants.

[1] Communal Area Management Programme for Indigenous Resources

There is therefore a need to ensure they can roam across huge areas of natural, wild habitat on private and communal land. However, it is on precisely this land that the competition for space between man and elephants is greatest and conflict most severe and growing. To compete successfully with other forms of land use, such as cattle and crops, elephants must be able to compete in the value they can return to the landholder.

Outside protected areas, successful conservation of natural ecosystems relies on commercial consumptive use and the economic value of wild species. Elephants have the highest value of all the components of natural African ecosystems. Therefore, to make it possible for elephant to range in natural habitats outside protected areas in order to ensure their survival, the elephant must have a strong commercial value.

This can be achieved through eco-tourism in some instances, but opportunities are limited and trade in ivory and other products is imperative.

b) Transfer to assist rural communities

Not only is trade in elephant products essential to conservation of both the elephant, its habitat and myriad other species, it is important for satisfying basic human needs in many areas of southern Africa.

Human/elephant conflicts are increasing and people are, in increasing numbers, defending their property and crops. In this process elephants are the losers. The future of the species depends on the goodwill and tolerance of the rural poor for whom they are neighbours. Attitudes will change and tolerance will increase if communities release economic returns from marketing elephants products.
It is fortunate then that programmes of Conservation-based Community Development, such as CAMPFIRE, are mushrooming in Africa's rural areas and offer the best hope for livelihoods in arid and semi-arid areas.

With only the export of sport hunted ivory allowed under CITES, communities earn from elephants enough to survive or supplement their meagre incomes. But about 26 % of the ivory in stock in Zimbabwe belongs to the CAMPFIRE communities. If they could realise the value of this it would be of enormous benefit - both to the people and to the elephants!

The use of elephant products is entirely acceptable to Zimbabwe even on ethical grounds. The costs of elephant conservation are largely being borne by Africa's rural poor. Many in Zimbabwe believe that the international community is putting the welfare of the elephant above that of people. This is neither acceptable nor necessary. Man and the elephant can live together and share the landscape, but the elephant must pay its way.

The human costs of elephant conservation must be given higher ethical consideration than the loss of animal life or freedoms. Western acceptance of this is self-evident from their life-styles.

c) The political imperative for transfer

i) *Whose elephants?*

In making the transfer to Appendix II, the Parties to CITES were treating the African elephants as a global resource and heritage. The Parties have taken the authority for elephants but they are not accountable for this decision and nor do they take the responsibility for its results. Elephants interact with people at community level and far away from most Parties to CITES.

Responsibility and accountability are left with the range states such as Zimbabwe for whom the promised alternative funding or compensation has not been forthcoming. Since all the costs of conservation are incurred by Zimbabweans, it is evident that the African elephant is ***not*** a global resource.

While Zimbabwe is left entirely responsible for the conservation of its elephants, in a developing country the conservation of wildlife cannot be a national priority for funding. Zimbabwe already invests a bigger percentage of its Gross Domestic Product in its national parks and wildlife conservation than does the USA.

In the absence of other funding mechanisms, the international community must adhere to the principle of sovereignty and sustainable use inherent in Agenda 21 and the Biodiversity Convention and allow Zimbabwe to manage its elephants as its sees fit.

Every country has the right to use their natural resources to their best advantage. It is especially iniquitous to prohibit a country from trading in one of the few resources in which it has a competitive advantage. Africa has few such advantages. Ivory is one of them.

ii) ***Political pressures***

There are now national political pressures for elephants to pay their way and contribute to the rural economy, which they are well able to do. Before the ban revenues from elephant products were equivalent to 28% of the wildlife department's budget.

Ivory revenues can now accrue directly to the wildlife department and also to CAMPFIRE communities who own about 26 % of the approximately 29 tonnes of ivory that the government holds for them in trust.

The majority of Zimbabwe's 11 million people live in the rural areas where natural resources are the basis of their economy. They also bear the direct costs of elephants. Not surprisingly, there are enormous political pressures for the re-establishment of a legal ivory trade from this important voting lobby.

Income generation from elephants is essential to secure political and economic support for conservation at both the local and national levels. At the level of the national conservation agency, money generated from the sale of elephant and other wildlife products will go a long way in financing conservation and management of wildlife resources.

iii) ***The integrity of CITES***

The controversy over the listing of the African elephant threatens to dominate CITES, but as much as many would like it to, the issue is too fundamental to go away. Many southern African nations continue to argue that the original transfer to, and the maintenance of their populations on, Appendix I was unjustified and punished their elephant conservation successes.

The transfer took place in 1989 with full recognition that the populations of southern Africa were well managed and did not merit the listing. This was formally recognised by the fact that a simple transfer was rejected and the elephant only transferred to Appendix I through the revised Somali proposal which established a Panel of Experts to assess the technical case for transfer of any populations back to Appendix II. Unfortunately, it appears that the international community in CITES has shown little respect for southern Africa in the elephant debate. Successful conservation has been punished and the region's conservationists have the impression that the goal-posts are continually moved when the reopening of a legal ivory trade is discussed.

Zimbabwe has a legitimate point of view, that a controlled legal ivory trade from southern Africa will not result in increased poaching in other countries or regions, and this deserves a fair test.

Breaking the elephant impasse is essential to the future of CITES.

The time is right to re-introduce a legal trade in ivory. The ban has been in place for six years and is beginning to come apart at the seams. The elephant problem is escalating and the future is bleak. At the same time the trade controls are in place and the option of legal trade demands investigation and an experimental trial. If it works the impasse will be ended and everyone will benefit.

CITES should not be looked upon and viewed as a body that is insensitive to legitimate calls. CITES will have an improved image by tackling the elephant issue in a positive way. Parties must acknowledge the effective conservation measures in Zimbabwe and other southern African countries and accept that these countries have viable populations of elephants. The debate should focus on how to open up legitimate trade and how CITES can best monitor and control this.

iv) ***African consensus***

There was no African consensus for the listing of the elephant on Appendix I - at least 9 African Parties voted against such a listing. Since there was not consensus at the time of the transfer to Appendix I it is not clear why an African consensus should be needed before Parties outside Africa feel they can support a transfer to Appendix II. Africa is a huge, heterogeneous continent with respect to culture, climate, economy, politics and, not least, conservation philosophy and achievement.

African consensus is unrealistic and the call for consensus is an unwritten pre-requisite for transfer raised as a barrier by outsiders.

d) Transfer in the interests for biodiversity conservation and management

As a result of nothing more than natural mortality, ivory is produced at a high rate from Zimbabwe's well-managed elephant herd. However, most of Zimbabwe's ivory, and virtually all the elephant hide, is a product of management in which elephant populations are reduced to keep habitat change within acceptable limits.

Elephant are a keystone species which have a great impact on Savanna ecosystems. At low densities they are beneficial to biodiversity but at high densities they have habitat impacts which threaten rare and endangered species. As a result of human pressures, but also because of well managed and growing populations, elephants in southern Africa are increasingly "compressed" at high densities in protected areas. When elephant densities rise above about one animal in every 4 sq km in semi-arid areas woodland habitats are severely damaged and biodiversity is lost.

Elephants are overstocked in most of Zimbabwe's parks, vegetation is suffering enormous damage and other species are being lost. Elephant populations recover much faster than trees and on the basis of the precautionary principle, most southern African ecologists consider it better to cull elephants than lose mature trees because this is the option of least risk.

Most, if not all parks with elephants are in areas of marginal rainfall and in addition, southern Africa is suffering recurring drought with rainfall severely below average in five of the last six years. Under these conditions, the capacity of the Savanna to support elephants has been reduced, enormous environmental damage is taking place and the rate of loss of biodiversity is increased. A massive die-off of elephants is likely to occur as happened in Gonarezhou National Park during the 1992 drought. This massive die-off

occurred despite the pre-emptive culling of about 350 elephants and translocation of about 1,600. Gonarezhou was the area most affected during the 1992 drought.

It is theoretically possible to leave the over-populated elephants to die to die of starvation as happened in Tsavo National Park in Kenya in 1971, and there are those who would favour this approach on the grounds that it is natural. However, this ignores the artificial nature of the situation where elephants have been compressed into protected areas. It is also a morally and politically unacceptable option to allow such a waste of meat in protein deficient areas when people are existing on less than a minimum diet. The people around protected areas are struggling to survive. Many have suffered severe starvation, most survive only through food aid and the proceeds of programmes like CAMPFIRE.

Such an option could also promote illegal traffic of ivory as the Management Authorities cannot recover all the ivory from natural mortality. The finding rates of ivory are extremely low (less than 6 %) even in heavily patrolled National Parks.

Well planned and efficient culling is less cruel than death by starvation. It is non-selective and as such it leaves the genetic structure of the population in place. In any case, alternatives to culling are not always available or desirable. One option, the relocation of whole elephant herds, has been pioneered in Zimbabwe and is often preferred to culling but is seldom practical and affordable - and it is hard to find places to take the animals.

Management such as culling and hunting are not incompatible with tourism. Elephants that are managed need not become more shy of man and tourists prefer to see them in well preserved and intact habitats.

This management is expensive and cannot be afforded without the return from products. Trade in elephant products is essential to support the management of elephant herds so that they are a benefit to the environment, not a burden on it. In addition, where management through culling provides the opportunity to benefit from elephant products, it is immoral for these not to be sold to maximum benefit. There must be controlled, legal trade.

Wildlife conservation in countries like Zimbabwe, which practise intensive and high investment elephant management such as hunting, culling and trade in ivory, have out-performed those with a "hands-off" policy.

Zimbabwe removed 46,000 elephants by culling and hunting between 1960 and 1991. Despite these removals the elephant population doubled within the same period. It now stands at about 66,000 animals. In Kenya, which neither culled nor traded ivory, elephant numbers plummeted during the same period from some 120,000 in 1970 to about 24,000 in 1990. Kenya is now introducing a policy of sustainable use.

Southern Africa is strongly unified on this issue of elephant management and has strong support programmes. Many countries have conducted outstanding research into elephant biology and conservation, and the survey methodology used in the region is amongst the most professional in wildlife management world-wide.

e) Transfer for control and enforcement

The ivory ban will not prevent the ongoing overall decline of elephant populations in Africa. In fact a controlled, legal ivory trade could be a major contributing factor to the survival of the species.

With the exception of a few case studies, there has been no monitoring of the effects of the Appendix I listing and it is not known whether this is responsible for any reported declines in poaching. It is undeniable that after the ban, some countries enjoyed a respite from poaching but many dispute the role of the Appendix I listing in this. The effects of the listing are confounded by the fact that many of the worst affected countries introduced effective law enforcement for the first time and the two biggest markets disappeared before the ban due to effective anti-ivory campaigns in Europe and the USA.

Even if the listing had an effect, this could be predicted and will not be a long term benefit. A down-turn in poaching was expected as the illegal traders adjusted to the new situation. Illegal trading still takes place and there is firm evidence to show that elephant poaching has increased in some areas of Zimbabwe since the ban.

There remains a demand for ivory and the Appendix I listing only stops legal trade not illegal trade. In fact, the ban actually entrenches the monopoly of the illegal trade. In addition, the illegality of trade fuels corruption.

The control of illegal trade requires expensive enforcement. The "Lusaka Agreement" for law enforcement in southern Africa would cost each member nations US$ 100,000 per year while resources for anti-poaching have dramatically declined in almost every range state since the Appendix I listing of the elephant.

The introduction of a tightly controlled, legal trade would provide the funding for enforcement. It would put the responsibility on the range state, where it should be, and also increase local incentives for conservation, making poaching more difficult and reducing the need for enforcement.

Ivory marketing controls, including the CITES quota system, used to work in southern Africa, this is not in dispute, and Zimbabwe can readily implement an even tighter system of control and enforcement. Zimbabwe has already met the approval of the 1992 CITES Panel of Experts and the Zimbabwe elephant population meets all the biological and technical requirement of the new criteria for transfer to Appendix II.

The proposal to transfer Zimbabwe's elephant population to Appendix II is annotated to include stringent controls in trade to take into account the concerns of other range states. For example, to prevent illegal ivory from other countries entering the trade, Zimbabwe will not sell ivory to any country which does not have stringent monitoring and control systems for the internal ivory trade.

f) Economic imperative for transfer

It is an economic imperative that controlled legal trade in elephant products must be reintroduced otherwise the elephant will surely disappear from the African landscape.

All resources, even wild animals with low population levels, can benefit from trade if it provides the incentives for investment in the long term future of the resource. This was the situation for elephants in Zimbabwe before the Appendix I listing brought about an effective ban on the trade in ivory.
Economic theory shows that very high value resources with low harvest costs and high discount rates, may be harvested to extinction. This was the situation with ivory in many countries which did not invest in elephant conservation as Zimbabwe did, and it was this problem which ultimately led the international community to ban the ivory trade.

In Zimbabwe, high discount rates were avoided because access to the elephant resource was assured to the "owners" (the wildlife department and CAMPFIRE communities) over a long period and the benefits of the ivory trade outweighed the costs of protection.

In simple terms, the elephant poaching problem in Africa was largely due to the fact that elephants were valuable - but not valuable enough to people on the land. In Zimbabwe rural communities were beginning to capture significant portions of the rising ivory and hide value. The Appendix I listing has impeded this process without any compensation to those affected.

Ivory obeys normal market forces. If higher prices for wheat, beef or chickens stimulates production then why should elephants be different? The answer lies in ownership and the ability to capture this value. In most of Africa, elephants belong to the state and are treated by rural people as an open access resource. Elephants come with high costs but as a result of the Appendix I listing give few benefits.

The direct costs of living with elephants include crop damage and injury to humans. The indirect costs include the opportunity costs of alternative land uses and the damage that elephants inflict on their environment. While the species is on Appendix I, the lost earnings from ivory and other products can be added to this. Benefits from elephants can be realised from tourism as well as consumptive uses, but tourism is not universally applicable and is often ecologically or socially damaging in itself. Consumptive uses and the sale of products are often preferred for a variety of reasons.

The Appendix I listing and ivory ban has therefore put Zimbabwe in the same position as those nations which failed to invest in conservation in the past. Low economic benefits from elephants results in low investment in habitat provision and management. As the incentives to maintain habitat for elephants is reduced, so too is the habitat for all wildlife. Thus elephant and *all* wildlife populations will ultimately be reduced by the Appendix I listing.

The prohibition of trade in any product for which there is demand results in the emergence of underground, illegal markets and corruption. The re-opening of a controlled legal trade is essential.

1. Taxonomy

1.1. Class Mammal
1.2. Order Proboscidea
1.3. Family Elephantidae
1.4. Species *Loxodonta africana* (Blumenbach, 1797)
1.5. English African elephant
French Elephant d'Afrique
Spanish Elefante africano
German Afrikanischer elephant
Portuguese Elefante africana
Shona Nzou
Ndebele Ndhlovu

1.6. Code number CITES A-115.001. 002. 001
ISIS 530141500100200100 1

2. Biological Parameters

2.1 Distribution

Historical It is widely agreed that elephant were distributed throughout southern Africa prior to the arrival of the first colonial settlers in the 17th century. From the early part of the 18th century, exploitation for ivory, expansion of human settlements and protection of agricultural crops combined to reduce populations throughout the region(1). Consequently, elephants in South Africa had largely been eliminated by the beginning of the 20th century except for a few remnant populations, the largest of which was in the (then) north-eastern Transvaal numbering at most a few hundred animals (2). Populations were similarly depleted in Zimbabwe (3,4), Botswana (5,6), Namibia (7), Zambia (8) and Malawi(9), and were extinct through most of their former range.

Current The range of the elephant in Zimbabwe can be considered in four major sub-regions: locally known as Matebeleland north-west, Zambezi Valley, Sebungwe and Gonarezhou (Table 1& Figure 1) each of which is greater than 500 km^2 (thus non of them is fragmented according to the biological criteria of annex 5 of Resolution Conf. 9.24) Another important point to note is that these sub-ranges cover all different land categories in Zimbabwe which include national parks estate, privately-owned large-scale commercial farming areas, communal lands, and the indigenous forest areas managed by the Forestry Commission of Zimbabwe. With the exception of Sebungwe region, all areas of major distribution are contiguous with the elephant ranges in neighbouring countries (Figure 2).

In addition to the main part of its range, within the four sub-regions identified above, the elephant in Zimbabwe is also found on privately-owned game farms and conservancies, isolated protected areas of the national parks estate and in some isolated Communal lands. By way of an example is the population centred on the Tuli Circle which abuts into Botswana (Figure 1).

Table 1. Approximate range (km^2)of elephant in Zimbabwe.

Regions	National Parks	Communal Land	Forest Areas	Private Land	Total
Matebeleland North	19,400	3,100	2,300	1,200	26,000
Sebungwe	6,200	8,400	400	-	15,000
Zambezi Valley	12,000	500	-	-	17,000
Gona-re-Zhou	5,250		-	-	5,250
Subtotal	**42,850**	**12,000**	**2,700**	**1,200**	**63,250**
Other Areas (minor range)	800	8,200	-	6,300	11,500
Approximate Total Range	**43,650**	**20,200**	**2,700**	**7,500**	**78,750**

Price Waterhouse (10) and Department of National Parks and Wildlife Management Records

Data on the habitat types occupied over the elephant range can be deduced from the broad vegetation classification maps (11). The vegetation types in areas occupied by the majority of elephant are shown in Table 2 below as compiled by Child and Heath (12).

Table 2. Vegetation types in the major elephant range.

Region	Broad Vegetation Type	Vegetation Communities
Matebeleland North	Woodland	*Baikiaea*
	Savanna woodland	*B. Boehmii-J. globiflora*
		C. mopane
	Tree Savanna	*Baikiaea-Burkea-C. mopane*
		Acacia-L. nelsii
	Thicket	*Commiphora - C. combretum*
	Shrub	*C.mopane*
	Grassland	*Lodetia*
Zambezi Valley	Thicket	*Commiphora-C. combretum*
	Savanna woodland	*B. spiciformis-J. globiflora*
		B. Boehmii-J. globiflora
		J. globiflora
		C.mopane
	Tree Savanna	*Parinari*
Sebungwe	Woodland	*Baikiaea*
	Savanna woodland	*B. Boehmii-J. globiflora*
		J. globiflora
		C.mopane
	Tree Savanna	*Adansonia-sterculia-kirkia*
		Terminalia sericea
		Acacia spp-Albizia-Bolusanthus
	Thicket	*Commiphora-C. combretum*
Gona-re-Zhou	Savanna Woodland	*B. Boehmii-J. globiflora*
	Tree Savanna	*Terminalia sericea*
		Commiphora-C. combretum
		Adansonia-sterculia-kirkia
	Shrub	*C. mopane*

2.2 Habitat Availability

Most elephant occur on land that is marginal for agriculture in agro-ecological region IV and V (Table 3). These regions are characterised by low, and erratic rainfall, limited surface water, and inherent low soil fertility. Under these conditions herbivore carrying capacity of the ecosystem is limited. Because humans and elephant compete for the same resources (13), the increase in human population in the last twenty years has lead to compression of elephant populations within protected areas in these marginally productive lands. The ultimate conclusion of this trend can be seen in Malawi, the country with the highest human population density in the southern region (Table 4). The range of the elephant has become fragmented and with small sub-populations. Craig (14) has shown how the barriers to dispersal reduce the overall carrying capacity for elephant populations in protected areas and can lead to local extinction.

Table 3. Protected areas and their agro-ecological regions in Zimbabwe.

Natural Region	Annual Rainfall	Parks and Wildlife Estate km^2	Total Area in Zimbabwe km^2	% of the Total Area
I	above 1 000 mm reliable	500	7,050	7.1
II	750 to 1 000 mm reliable	250	58,750	0.4
III	650 to 750 mm erratic	5,450	72,900	7.5
IV	450 to 650 mm v.erratic	25,100	147,700	17.0
V	below 450 mm unreliable	18,400	104,500	17.6
Total	-	49,700	390,900	12.7

Source: Graham (15).

Table 4. Human population data in the states which are members of the Southern African Convention for Wildlife Management (SACWM).

Country	**Area km^2 x 1000**	**Present Population millions**	**Population Density per km^2**	**Population Growth Rate. % per annum**	**Population in 2000 AD millions**
Botswana	585	1.30	2.22	3.51	1.77
Malawi	94	7.90	83.97	3.31	10.59
Namibia	824	1.16	1.41	2.66	1.47
Zimbabwe	387	10.10	26.12	3.15	13.35

Source (16,17)

Elephant population compression, as a result of growing human population has been cited as the principal factor in the modification of habitats of the protected areas of Zimbabwe including: Hwange National Park (18, 19), Chizarira National Park (20), Zambezi escarpment Parks areas (21), and Sengwa Wildlife Research Area (22, 23, 24). Similar impacts on vegetation have been demonstrated in protected areas of other southern African range states, including: Chobe National Park, Botswana (25), Etosha National Park, Namibia (26), Luangwa Valley, Zambia (27, 28). There is also particular concern about the threat to *Colophospermum mopane* from elephants in the protected areas of southern Africa. This has led to a research project by the Department of Biology and Wildlife of University Alaska-Fairbanks, to evaluate the elephant browsing and the patch dynamics in the *Colophospermum mopane* habitats of the Zambezi region in Zimbabwe.

The relations between elephant densities and woodland persistence are sufficiently defined (29) to be able to predict that whenever elephant densities exceed 1/km^2 almost the entire cover of mature canopy trees will disappear. Some degree of canopy cover can be maintained in the long term at lower elephant densities but to preserve a semblance of climax woodlands requires elephant densities not exceeding 0.25/km^2 (30).

2.3 Population Status

The status of elephant population in the major range is determined by systematic aerial sample counts (See section 4.2.1 for details). The population estimate from the 1995 national aerial survey over the approximately 61 000 km^2 of the major elephant range is 64,478 $\pm$ 10.1 % (Table 5). It is estimated that an additional 2,200 elephants exists in the unsurveyed minor ranges, giving a total of approximately 66,600 animals. There was no national aerial survey in 1996.

Points to draw attention to in these population figures are:

(a) some of the sub-populations within Zimbabwe are contiguous with populations in neighbouring countries (Figure 1). There are as yet no areas in the region totally separated from others by barriers. There are still corridors of natural habitat permitting the movement of animals which helps maintain genetic interchange and diversity.

(b) Using the Mace-Lande (31) criteria for threatened taxa neither the Zimbabwe national population nor the major sub-populations should be considered vulnerable or endangered.

(c) Some 18% of the total population occurs outside protected areas of which 16% occur in the communal lands. Survival of these sub-populations is essential to link populations in protected areas and to avoid the formation of "ecological islands" of elephant. The future of these elephants, however, is closely linked to their economic value (see Rationale above).

Table 5. Summary of numbers of elephants in Zimbabwe from 1995 surveys

Region	Census zone	Area km^2	Numbers Estimated	% Confidence Limits
Matebeleland north-west	National Parks Estate	19,618	27,191	16.4
	Forests	2,344	937	123.7
	Communal Lands	3,110	2,859	127.1
	Subtotal	**25,072**	**30,987**	**18.6**
Zambezi Valley	National Parks Estate	10,359	14,998	15.6
	Communal Lands	5,105	2,445	23.4
	Subtotal	**15,464**	**17,443**	**13.8**
Sebungwe	National Parks Estate	5,715	6,367	18.1
	Forests	609	124	163.1
	Communal Lands	8,858	5,306	29.6
	Subtotal	**15,182**	**11,798**	**17.4**
Gonarezhou	Gonarezhou National Park	4,972	4,251	35.9
	Communal Lands	405	0	-
	Total	**5,377**	**4,251**	**35.9**
Total for Major Elephant Range		**61,095**	**64,478**	**10.1**
Minor elephant range (unsurveyed Areas)	Parks Estate	**860**	**360**	-
	Communal Lands	**8,200**	**110**	-
	Private	**7,500**	**1683**	-
	Grand Total	**77,655**	**66,631**	-

Source: DNPWLM (32)

2.4 Population Trends

Although elephant numbers have been surveyed over much of their range since 1980 (10) comparisons of national estimates between years are difficult because the precise area surveyed has differed from year to year. However, direct comparisons are available for 1980, 1983, 1989, 1993 and 1995 (Table 6). The area surveyed during these years was at least 80 % of the total range. The 1995 estimate for the population was the highest to-date showing that the population continues to grow despite large take-offs of elephants in populations control exercises between 1980 and 1989.

In 1992, the Panel of Experts found no reason to doubt the estimates obtained and the credibility of the methods employed by the Department of National Parks and Wild Life Management (DNPWLM)[2]. In addition, a highly respected international firm of Chartered Accountants, Price Waterhouse, undertook an independent audit of the surveys and methods used and concluded that the results from surveys during the period 1980 until 1995 were valid and appropriate, and there is no reason to doubt the population estimates (10). The data reviewed suggest that the population in the core 80% of the range increased from approximately 46,000 in 1980 to approximately 64,000 in 1995.

[2] In 1992, according to Resolution Conf. 7.9, the CITES Standing Committee appointed the Panel of Experts to evaluate the proposal to transfer the populations of the African elephant of Botswana, Malawi, Namibia, Zambia, and Zimbabwe from Appendix I to II.

Table 6. Elephant population trends in the major elephant range:

Region	Census Zone	1980	1983	1989	1993	1995
Matebeleland N-W	National Parks Estate	20,444	25,888	27,411	26,796	27,191
	Forest Areas	N.S	N.S	N.S	815	937
	Communal Lands	N.S	N.S	N.S	230	2,859
	Population Estimated	20,444	25,888	27,411	27,841	30,987
	95 % C.L	±34%	±27%	±33%	±28%	±19%
	Area Surveyed km^2	18,709	19,153	18,933	24,935	25,072
Zambezi Valley	National Parks Estates	10,152	9,907	12,744	13,904	14,998
	Communal Lands	N.S	N.S	1,334	2,685	2,445
	Population Estimated	10,152	9,907	13,029	14,361	17,443
	95 % C.L	±19%	±17%	±19%	±16%	±14%
	Area Surveyed km^2	13,986	10,882	11,304	10,917	15,464
Sebungwe	National Parks Estates	8,302	6,088	9,508	7,253	6,367
	Forest Areas	89	0	319	70	124
	Communal Lands	2,735	3,214	3,463	3,419	5,306
	Population Estimated	11,126	9,302	12,946	10,742	11,797
	95 % C.L	±20%	±16%	±23%	±21%	±17%
	Area Surveyed km^2	14,129	13,601	12,568	15,118	15,182
Gona-re-Zhou	Population Estimated	4,604	3,985	5,286	5,241	4,251
	95 % C.L	±29%	±25%	±27%	±59%	±36%
	Area Surveyed km^2	4,855	5,208	4,900	5,171	5,377
Grand Total	Grand Total Population Estimate	46,426	49,082	58,672	58,185	64,478
	95 % C.L	±19%	±15%	±17%	±15%	±10%
Grand Total	Grand Total Area Surveyed km^2	51,679	48,844	47,705	56,141	61,095

N.S-Not Surveyed Source: Price Waterhouse (10) and DNPWLM records

2.5 Geographical Trends

The geographic range available to elephants and the number of sub-populations is constant within protected areas. There has been a steady increase in elephant range in the recent years in the privately-owned large scale commercial farming areas and the decline in some communal areas has been arrested as a result of land use policies which allow land owners to manage and benefit directly from their elephant populations. Many farmers in the semi-arid rangelands have joined their ranches together to form wildlife conservancies. As of October 1996 there were four conservancies or private game reserves with an approximate extent of 6,000 km^2 and an estimated elephant population of 930 (Table 7). The seed population was obtained from translocation programmes from Gonarezhou national park during the 1992 drought, and from the purchase of elephant calves from population reduction exercises.

Table 7. Elephant range and numbers in the conservancies of Zimbabwe

Conservancy	Area km^2	Numbers of elephant	Target Population
Bubiana	1275	70	100
Chiredzi River	895	27	50-60
Marirangwe Conservation Trust	300	128	240-300
Midlands	613	6	Small
Save	3213	700	1,000-1,500
Total	**6,296**	**931**	

There has been a long term decline in the range available to elephant in the communal lands together with an on-going increase in the number of both elephant and livestock in the CAMPFIRE areas. The expansion of human settlement and its associated crop and livestock production in areas formerly infested with tsetse fly has been the major reason for the decline in wildlife habitat in communal lands. A comprehensive programme to monitor animal populations and distribution in the CAMPFIRE areas was introduced in 1989 under the WWF and DNPWLM collaborative project.

The introduction of CAMPFIRE has helped stabilise, and in some places has reversed, the rate of conversion of wild habitat as rural communities in these areas have adopted wildlife production as a land use option and have designated land exclusively for wildlife while it remains economically profitable for them to do so. For example in 1989, the Kanyurira community (under the auspices of its wildlife committee) of Dande communal land, with the assistance of WWF and the Centre for Applied Social Sciences (CASS) of the University of Zimbabwe began a land use plan to integrate their agriculture and wildlife production systems and to make provisions for livestock which would be acquired once the threat from tsetse fly had been eliminated. The agricultural activities and human settlement were confined to an electric fenced area of 20 km^2 and the rest of the 400 km^2 of the ward was set aside for wildlife production. Similar projects have been undertaken in Gokwe north, Binga and Omay communal lands.

It is therefore important that these rural communities receive the full economic return from their animals if land is to remain available to elephant outside protected areas. This has to be achieved while the competitive edge is tilted against wildlife in favour of agricultural activities through donor subsidies of less ecologically and economically efficient agricultural production systems, and the loss of wildlife values due to the listing of the elephant on CITES Appendix I.

A high value for the elephant in the communal lands is critical if wild land is to remain to provide essential links between isolated protected areas. It is also important in determining the maximum number of elephants that can be accommodated in Zimbabwe.

2.6 Role of the Species in its Ecosystem

Elephant, because of their large body size, substantial food requirements, their ability to change vegetation structure and species composition, and their importance in nutrient cycling and seed dispersal, have been described as keystone species for both forest and Savanna ecosystems. Elephant have a large impact on vegetation because they are generalist feeders, eating a wide range of plant species and plant parts at all heights. They are also wasteful feeders.

At low densities elephant impacts promote species richness and biodiversity. In wooded areas, at low densities, elephants open up thickets creating pathways for other species and promoting the growth of grasses. At higher densities thickets are destroyed and trees are knocked down, encouraging the growth of grasses and changing the species composition of the ecosystem. Changes in vegetation composition involving a reduction in woody cover, and even changes to open grassland, can result from the high elephant density (See section 2.2)
Increasing human pressures and well managed and growing elephant populations in southern Africa are leading to increased 'compression' of the species in many protected areas. As outlined in section 2.2, when elephant densities rise above about one animal in every 3-4 sq km in the semi-arid areas, woodland habitats are likely to be damaged and biodiversity is lost and this becomes severe with rapid loss of biodiversity at greater densities of this ecologically dominant animal.

2.7 Threats

The Panel of Experts concluded in 1992 that there were no threats to the survival of Zimbabwe's elephant population in the short or medium terms. In spite of illegal harvesting which took place in the 1980s in the Zambezi Valley and in Gonarezhou National Park, Zimbabwe's elephant populations continued to increase as confirmed by an independent audit of the elephant survey figures.

However, the illegal traffic in ivory remains a low-level (and possibly growing) problem which is difficult to control. In previous sections, it has been argued that as the central government tightens its expenditure under the economic structural adjustment programme introduced in 1990, the reintroduction of a controlled, legal ivory trade is the only way to fund anti-poaching and other conservation activities.

As already stressed, the most serious threat to the survival of viable populations of elephants is the expansion of human settlement and agriculture in the semi-arid areas where most elephant survive. Ultimately, it leads to the eradication of elephants outside protected areas and to their overcrowding inside them.

If the expansion of human population cannot be arrested and without a significant value for wildlife, especially for the elephant, there will be severe fragmentation of habitats resulting in the isolation of elephant populations. The protected areas in the Sebungwe region, for example, are relatively small (less than 10,000 km^2) and surrounded by communal lands. The existence of a hard edge between such protected areas and communal lands leads to serious human/elephant conflicts. Healthy, viable elephant populations inside the government's protected areas are dependent on the survival of suitable habitats in the communal areas. In 1992, the Panel of Experts noted that elephant populations on privately-owned farms and in communal lands could increase significantly if it was in the economic interest of the farmers.

3. Utilisation

3.1 National Utilisation

Zimbabwe does not exploit elephant directly for their products either for commercial trade or domestic consumption. Indeed, it is recognised that the direct harvest of elephants for their products is often the lowest valued use for the species - recreational hunting and photo-tourism can add a great deal of value to elephant populations. However, large numbers of elephants have been removed to achieve specifically targeted population reductions for conservation purposes. This information is included in Section 4.2.3.

a) Recreational Hunting

The principle form of utilisation of elephant in Zimbabwe at the moment is recreational, or 'sport hunting'. Elephant are hunted on safari with an annual quota of approximately 200 animals (100 in the state safari areas and 100 in the communal lands) (Table 8). In addition to hunting on these major areas, recreational hunting is also conducted on private and indigenous forest areas with an annual quota of approximately 70 animals.

The annual CITES export quota is 300 pairs of tusks. The DNPWLM has introduced a tag system to facilitate the management of this export quota.

Elephant hunting contributes about 64 % of the total income earned by Rural District Councils involved in CAMPFIRE (31) and about 50 % of the income earned from recreational hunting on state safari areas (Heath, pers comm). Recreational hunting produces up to 10 tonnes of ivory but none of this enters the commercial trade.

Table 8. Elephant recreational hunting quotas for the major hunting areas 1992-95.

Year	State safari Areas		Communal Land	Total
	Foreign	Local	Foreign	
1992	72	*	102	174
1993	69	18	104	191
1994	75	9	119	203
1995	77	19	130	226

Source: DNPWLM records

b) Live Sales

Elephant calves captured during population reduction exercises are sold and translocated to private game ranchers. During the 1992/93 drought in Gonarezhou, about 1,400 elephants were sold and translocated to local farmers and about 200 whole family herds were sold and translocated to South Africa.

c) Sale of elephant products(ivory, hides and meat)

Sales of ivory before and after the Appendix I listing are shown in Table 9. Child and White (34) have described the various systems for selling ivory and other products in Zimbabwe. Since 1977 ivory has been sold through public auctions, by tender and, for small amounts, by direct sales from the government ivory store at the prices prevailing after the most recent ivory auctions.

The last sales by tender were in 1985 and the last by public auctions was in April 1989. After the Appendix I listing, sales to the local ivory carving industry were made direct from the government ivory stores.

Table 9. Ivory Sales: 1986-1996.

Year	National Parks		Rural District Councils	
	Weight (kg)	Value (Z$)	Weight (kg)	Value (Z$)
1986	7,589.4	548,300	868.0	99,180
1987	5,657.3	490,548	463.5	70,945
1988	5,622.5	880,048	1,225.0	260,584
1989	3,551.0	595,725	391.0	94,802
1990	2,347.0	313,478	305.3	62,709
1991	3,434.5	603,624	752.8	202,164
1992	2,251.0	449,498	944.0	197,205
1993	5,737.2	1,166,560	363.0	85,799

1994	3,536.5	997,478	179.3	62,141
1995	4,120.3	1,416,435	1,333.6	455,291
1996*	8,106.8	3,147,937	2,782.2	1,062,769

Source: DNPWLM records
*Ivory sales from 03/01/96 to 11/12/96

The local ivory carving industry has been described by Martin (35) and was estimated to be earning some Z$ 8 million in 1983. Before the Appendix I listing of elephants in 1989, some 800 people were employed in the industry (Mavros, pers. comm.). A few of these have been retrenched since 1989, but the industry continues to manufacture ivory products, albeit at a lower level than before, and there has been some diversification into other processed products since 1989. The annual sales of raw ivory to local dealers has been averaging 5 tonnes but has suddenly increased to 10 tonnes in 1996. This sudden increase in the quantity sold could be due to the following reasons:

- many international conferences were held in Zimbabwe during 1996 so the demand of ivory carving products could have been high;
- there was an anticipation of huge price increases in the price of ivory following the review of all tariffs for the goods and services offered by the DNPWLM;
- if the allegations that some dealers were smuggling ivory are true, this could also have contributed to the increase in quantity purchased.

Sale of other products (such as meat and hides) from culling are detailed by Booth (36) for the years 1981-1988. The value of the hide which was exported between 1986 and 1990 is shown in Table 10. The value of hide is significant as shown by the comparison of the value of the ivory which was exported during the same period.

Table 10. Gross value of hides exported from Zimbabwe between 1986 and 1990, and the calculated return to producers (US$).

Year	Hide Export Quantity	Hide Export Value US$	Producer return US $	% Value to Producer	Value of ivory exports	Value of hide as % of ivory
1986	216,964	864,082	527,090	61 %	2,816,222	30 %
1987	219,677	1,652,038	1,371,191	83 %	1,633,333	101 %
1988	230,686	1,765,372	1,447,605	81 %	2,105,561	84 %
1989	108,025	1,043,460	553,034	53 %	558,941	177 %

Source: Dawe and Hutton (32)

In the pre-ban period, dry-salted elephant hides were offered to local and foreign buyers at regularly -scheduled auctions sponsored by DNPWLM. Most of the raw hide was purchased by local tanners, who produced elephant leather primarily for export to the United States and , by 1988, increasingly to new markets in the Far East. After the ban, the elephant hide industry totally collapsed.

d) Eco-tourism

Elephant, along with other big game, represent a big drawcard of tourists, especially as the likelihood of sighting them in major national Parks is very high. Tourism is the third highest foreign currency earner and the fastest growing industry in Zimbabwe. The two main attractions bringing tourists to Zimbabwe are the beautiful scenery and wildlife.

e) Ivory and hide stocks

The elephant products available in central storage facilities of the Management Authority are from the off-take of elephant in management activities such as problem animal control (PAC), culling,

confiscation from illegal hunters or traders and, often greatly underestimated, recovered from natural mortality. Ivory records 1985-94 are detailed in Table 11 and the hides produced from utilisation of elephants through sport hunting, PAC and culling are detailed in Table 12. The commercial use of products inevitably generated through elephant population management and natural mortality is important to provide financial resources for conservation, not only directly to government, but also to give the conservation incentives to rural communities involved in CAMPFIRE.

Table 11. Source and quantity (kg) of ivory recovered by the Management Authority, 1985-1994

	Culling	PAC	Natural mortal-ity	Poached from field	Confis-cated	Tsetse Control	Profi-ciency Test	Other	Total
1985	1,762	2,225	673	684	547	141	0	437	22,327
1986	11,660	2,873	1,011	346	820	29	0	0	16,739
1987	6,822	3,236	2,467	681	545	19	0	0	13,770
1988	5,587	3,143	2,043	365	694	28	0	0	11,860
1989	673	1,994	2,475	408	367	53	0	0	5,970
1990	224	2,701	1,677	820	171	56	0	309	5.958
1991	313	2,324	3,502	660	554	0	0	332	7,685
1992	5,705	1,287	7,436	798	193	0	115	74	15,608
1993	127	553	3,256	833	182	0	193	38	5,182
1994	459	1,204	3,030	241	105	0	140	0	5,638

Source: DNPWLM records. Figures for 1991-1994 are still to be verified by TRAFFIC(East|Southern Africa).

Table 12. Accumulated stocks (kg) of elephant hide identified by source

Year	Cull		PAC		Recreational Hunting		Approx. Total Yield
	No.	Yield	No.	Yield	No.	Yield	
1985	3,704	240,760	93	3,720	203	26,390	270,870
1986	2,404	156,260	200	8,000	198	25,740	190,000
1987	1,065	69,225	156	6,240	203	26,390	101,855
1988	1,150	74,750	107	4,280	203	26,390	105,420
1989	126	8,190	86	3,440	208	27,040	38,670
1990	44	2,860	118	4,720	161	20,930	28,510
1991	266	21,280	85	3,400	180	23,400	48,080
1992	353	28,240	54	2,160	187	24,310	54,710
1993	379	26,300	16	640	184	23,920	50,860
1994	21	1,680	38	1,520	211	27,430	30,630
1995	36	2,880	25	1,000	200	2,600	6,480

Source: Dawe and Hutton (37) and DNPWLM records

An inventory of the existing ivory stockpiles as of 31 October 1996 is detailed in Table 13 below. TRAFFIC(East|Southern Africa) is assisting DNPWLM in setting up a computerised Ivory Database Management System(See Annex 1). The inventory given below is the first product of the project.

Zimbabwe has no formal moratorium on raw ivory but has not made any commercial exports of raw ivory since the Appendix I listing of the African elephant. This proposal seeks to down-list the elephant population of Zimbabwe to allow for the disposal of the existing stocks of ivory. It must be noted that stockpiles will be continually replenished at the rate of about 5,000 kg a year through natural mortality and this rate will be increased by problem animal control and other management activities. However, no further exports of ivory will be made without returning to the C.O.P to ask for additional quotas through a proposal to renew a quota in terms of Resolution Conf. 9.24.

Table 13: Ivory Stock (as Of 31/10/96) in the National Stockpile of the Management Authority of Zimbabwe.

	Parks	Communities	Total
Tusks in stock	2156	683	2839

Weight(kg)	21535.19	7744.55	29279.74
Average Weight	9.99	11.34	10.67
Standard deviation	8.27	6.64	7.93

source: DNPWLM records

Currently the DNPWLM is holding a large stock of elephant hide but the exact quantity is unknown at this time as some quantity is held at field stations. There is no security risk in keeping them at field stations and also there is no incentive of transporting them to Harare as there is no demand for hide.

3.2 Legal International Trade

Since the listing of the species in Appendix I of the CITES, Zimbabwe has not sold raw ivory on the international market. The amounts of ivory available for trade from 1985-94 are shown in Table 10. However, there have been allegations that some local dealers were smuggling ivory to some Far East countries. The DNPWLM, with the assistance of some local law enforcement agents and Interpol is carrying out investigations. It is necessary to explain that in ivory auction sales from 1985 to 1989 only a portion of the total offered (20-40%) was permitted to be exported, the bulk being reserved for the local manufacturing industry. In practice, local buyers usually purchased small amounts of the non-restricted ivory available to the international market. Thus, figures show the maximum amount of ivory which was available for international trade although actual exports were lower because of the small amounts purchased for local manufacture.

When this proposal is approved by the Parties, international sales will resume in early 1998 when one shipment will be made in accordance with the obligations laid out in this document. A second shipment will take place in 1999, but then the quota for ivory will fall away. Not all the ivory in the stock will be exported. A significant portion will remain embargoed for local industry.

3.3 Illegal Trade

Illegal trade in ivory in the region is relatively low, but probably increasing. Data on ivory seizures in or from Zimbabwe, reported number of elephants poached in Zimbabwe from 1985 until 1995, and the carcass ratios[3] for the period between 1990 and 1995 are shown in Tables 14, 15 and 16 respectively. On the national aerial surveys, elephant carcasses are counted and the ratio of dead to live elephant are used as a rough estimate of the mortality over preceding years. A rough rule of thumb indicates that if dead elephants (or carcasses) form more than 5-10% of the total population then above average mortality has been experienced in the preceding years. The data on carcass ratios suggest that there has been very low mortality which can be assumed to be from illegal off-take, except in the Gonarezhou National Park. The high ratio of old carcasses in Gonarezhou can be attributed to a high level of illegal activities during 1987, together with natural mortality from the 1992/93 drought.

The recovery by Customs and law enforcement officers in the field of ivory from illegal hunting and trade amounts to about one tonne of ivory annually and there is no obvious trend since 1985. However, there are both apocryphal and well documented reports of increased poaching from some localities.

Prior to 1984, illegal hunting levels were very low. As numbers of rhino and elephant became depleted in countries to the north of Zimbabwe, large armed gangs began to enter across the northern and north-eastern borders. The record of elephants and rhino killed since 1984 is given in Table 16. In the early stages of the "assault", hunting forays were confined to the Zambezi valley but by 1987 all areas in the north of the country were under pressure

[3] Carcass ratios are calculated as the proportion of dead elephants expressed as a percentage of the estimate of the live elephants. Fresh carcass less than a year old. Old carcass (old bones)= more than a year old.

Table 14. Ivory seizures in or from Zimbabwe

Year	Country of seizure	No. of Seizures	No. of Items seized	Weight of Items seized (kg)	Remarks
1991-93	Denmark	2	WI:2 IT:2		No weight available.
1993	Italy	1	WI:3		No weight available.
1991-93	Germany	15	WI: 69 RIT: 7		No weight available for all cases. One case ivory from Cameroon.
1990-93	Portugal	3	WI:2 RIT:1	RIT: 11	quantity of WI for one case is unknown.
1990-93	United Kingdom	19	WI: 43		No weight available for all cases. Two cases United Kingdom is the country of export and for one of these two cases Japan is the country of destination. In one case Zimbabwe is the country of import.
1990-95	United States	50	WI:204 RIT: 14		No weight available for all cases. Three cases the country of export is Saudi Arabia, in one case the country of export is Japan, and for one case country of origin is Ethiopia.
1994	Zambia	1	RIT:16		No weight available
1990-95	Zimbabwe	32	RIT: 89 WI:2 RIP:13	RIT: 72.4 RIP:25	Two cases ivory destined for Nigeria and Spain. one case ivory originated from Mozambique.
TOTAL		123	WI: 325 IT: 2 RIT: 127 RIP: 13	RIT: 83.4 RIP: 25	

Key: WI: worked Ivory. RIT: Raw Ivory Tusk. RIP: Raw Ivory Piece. IT: Ivory Trophy.
Source: TRAFFIC East/Southern Africa.

Table 15. Illegal off-take of elephant and rhino from the major populations of Zimbabwe.

Year	Matebeleland north		Zambezi Valley		Sebungwe		Gona-re-Zhou	
	E	R	E	R	E	R	E	R
1985	-	-	27	108	-	-	5	110
1986	1	1	17	150	-	2	6	155
1987	-	2	9	170	-	1	30	180
1988	8	17	14	76	3	50	823	184
1989	8	17	9	50	3	57	8	129
1990	7	18	73	37	9	61	10	117
1991	6	17	41	27	7	56	12	100
1992	12		38		-		11	
1993	10		37		11		-	
1994	6		31		8		1	
1995	13		12		2		11	

E-numbers of elephants killed. R-numbers of rhino killed. Source: DNPWLM records

Table 16: Carcass ratios for the elephant range region

Year	Matebeleland north		Zambezi valley		Sebungwe		Gona-re-Zhou	
	Fresh	old	Fresh	old	Fresh	old	Fresh	old
1990	0 %	0.5 %	*	*	*	*		
1991	0.06 %	2.1 %	*	*	*	*	0.2 %	7.1 %
1992	0 %	3.5 %	*	*	*	*	*	*
1993	0 %	6.4 %	0	3.4 %	*	*	0.1 %	11.0 %
1994	0.1 %	2.7 %	*	*	0	2.4 %	*	*
1995	0 %	4.5 %	0.1 %	7.0 %	0	2.4 %	0	23.0 %

* Data not available or the respective areas were not surveyed.

Historically, the level of illegal hunting of elephants in Zimbabwe has probably been low for the following reasons:

a)Expenditure on conservation in the region has been relatively high compared to the rest of Africa:
b)The majority of illegal hunting efforts are still being directed at black rhino in the region.
c)There is strong support for law enforcement in many areas from rural communities who manage their own wildlife for direct financial gain.
d)There is co-operation between countries in the region to reduce illegal hunting (for example, Zambia has greatly assisted Zimbabwe combat illegal incursions across the common border (38, 39)).

The manpower, budgets and transport available to the DNPWLM to protect elephant(and other species) for 1995 are shown in Table 17. The total budget of the wildlife department in 1995/96 was less than US$ 8 million (Table 18) and, based on a minimum required expenditure of US$ 400/km^2 for successful law enforcement, the actual required budget is some US$ 20 million annually. Thus, the wildlife authorities are severely under-funded. The potential income from elephant products derived from management could make up the shortfall.

Law enforcement staff densities should at least 1 man/50 km^2 and preferable closer to 1 man/20 km^2 but the existing densities are well below the ideal(Table 17). Law enforcement has remained more or less constant since 1984 in terms of effort, despite the retrenchment of 250 field staff in 1992 and continued

shrinking of the department budget allocation from central government (Table 18). The total time staff are spending on patrols has increased and in some areas Departmental or Air-force aircraft are used to detect incursions. Personnel from Zimbabwe National Army and the Police also assist through the 'Operation Safeguard Heritage' programme launched by the President in November 1994.

Table 17. Resources available for law enforcement in protected areas (as of March 1996)

Law Enforcement Feature	Matebelela nd North	Zambezi Valley	Sebungwe	Gonarezhou	Totals
Officers	27	14	9	8	58
Field Staff	147	173	91	97	508
Total Manpower	**174**	**187**	**100**	**105**	**566**
Salaries (approx.) (ZW$)	5,689,288	4,941,138	2,520,425	1,834,579	14,985,430
Operational budget (ZW$)	2,343,800	1,682,250	1,325,880	826,700	6,178,630
Total Budget	**8,033,088**	**6,623,388**	**3,846,305**	**2,661,279**	**21,164,060**
4- wheel Drive Vehicles	13	10	6	4	33
5- Ton Trucks	11	6	4	7	28
Total Vehicles	**24**	**16**	**10**	**11**	**61**
Air-Craft	2	0	1	1	4
Boats	2	6	7	0	15
Protected Area(km^2)	19,400	12,000	6,200	5,250	42,850
Field staff Density (men/km^2)	111	64	62	50	76
Area per vehicle	808	750	620	477	702
Total Expenditure (US $/km2)	**41**	**55**	**62**	**51**	**49**

Source: DNPWLM records

Table 18. Budget allocations to the DNPWLM from Central Treasury

Financial Year	Allocation Z$	US $ Equivalent
1980/81	5,921,000	8,289,400
1985/86	13,360,000	7,882,400
1990/91	29,811,000	5,962,200
1995/96	56,791,000	6,310,000
1996/97	10,000,000	1,000,000

Source: DNPWLM records

How legal trade will affect illegal trade

The approval of this proposal and the transfer of the Zimbabwe population of the elephant to Appendix II will not stimulate illegal trade. The fear that any legal trade will both act as a screen for illegal trade in the exporting country and encourage illegal trade in other range states is the basis of much of the opposition to a transfer of the elephant to Appendix II. In fact, the idea that legal trade encourages illegal trade is a powerful myth, and one which is perpetuated by some non-governmental organisations. In the only comprehensive assessment of the effect of CITES on a taxon, the Crocodile Specialist Group of the World Conservation Union (IUCN) wrote: "*.It has been claimed that opening legal trade under CITES provides a cover for illegal trade and also creates expanded markets, which are then supplied illegally. The objective experience in crocodilians is the opposite. As legal trade has expanded, illegal trade has contracted*". And so we expect it to be with the elephant. This proposal contains adequate safeguards to ensure that other range states are not negatively affected by a re-opening of a limited, legal ivory trade. In addition, in the unlikely event that genuine problems related to legal trade or the stimulation of illegal trade be identified, the transfer can quickly and effectively be reversed.

3. 4. Actual or Potential Trade Impacts:

Trade in elephant products will have a positive effect on the elephant populations concerned (see Rationale, in the introductory statement). The southern African countries see the absence of trade as the greatest threat to elephant survival in the region. Many people are concerned that any legal trade will encourage illegal trade, however illegal trade is re-growing and the biggest threat to elephant in the long run may be their lack of a legal value. Those concerned about elephant conservation must draw lessons from other species like the white rhino. The issue of ivory stockpiles in Africa is a fundamental problem which needs to be solved and an experimental controlled trade is needed. The four countries of the Southern African Convention for Wildlife Management (SACWM) respect fully the desires of those range states wishing to retain their elephant population in Appendix 1 and in this proposal have taken maximum measures to ensure that trade from Zimbabwe will not prejudice elephant populations in other parts of Africa.

Zimbabwe wishes to draw very strong attention to the fact that there are no requirements for the effects of an Appendix I listing to be monitored, and therefore it is impossible to state with any confidence whether the Appendix I listing of the African elephant had any beneficial - or negative - effects on the conservation status of the species. Similarly, it will not be easy to tell what the effects are of a transfer to Appendix II. It is therefore necessary for the Parties to agree to establish a mechanism independently to monitor these processes so that more informed decisions can be made in future.

From the sale of ivory, Zimbabwe will make funds available to respectable organisations such as the IUCN to monitor population trends and trade patterns in neighbouring countries. All proposals to this effect will be evaluated on their merit.

At the Dakar meeting of the elephant Range States, it was noted that there was no demonstrated link between trade in hides and poaching. The Range States broadly agreed that such a trade would not endanger elephant populations.

3.4.1 Live Specimens:
There is very small trade in live elephant within the region. Elephant calves from culling operations in Zimbabwe and South Africa are used as founder populations for new areas (usually less than 50 in any year). Of the Zimbabwean calves, the majority are purchased by local farmers to stock their own land. About 200 elephants, including adults, were translocated to South Africa from Gonarezhou National Park to stock a new Game Park. The technique of moving whole family groups was pioneered in Zimbabwe as a short term alternative to culling.

3.4.2 Parts and Derivatives:
The proposals for trade in ivory and other elephant products have been dealt with fully in section 3.2.

3.5 Captive Breeding
There is no significant commercial captive breeding *of Loxodonta africana* anywhere in the world.

4. Conservation and Management
4.1. Legal Status
4.1.1. National.
The laws which determine the application of CITES in Zimbabwe have been independently reviewed as part of a CITES process. The Control of Goods (Import and Export) (Wildlife) Regulations 1982 (No.1) (S.I. 557 of 1982) and the Parks and Wild Life Act 1975 as amended at 1 August 1990, together with later regulations were analysed and the report concluded "*The combination of these two pieces of legislation therefore allows for an effective implementation of CITES.*" The full text of the report is included as Annex 2.

The range available to the elephant in Zimbabwe is found in National Parks, which offer the highest level of legal protection, through to Safari areas, Communal and Private land where sustainable recreational hunting is permitted. Killing of elephants (and other animals) in National Parks is only undertaken as a management tool to protect habitats. Under the Parks and Wild Life Act, as amended 1st August 1991, the sale and purchase of live animals or trophies is subject to a permit whether they occur in the Parks and Wild Life Estate, or on communal or private land, and hunting is subject to permit on state land.

It is doubtful if the elephant requires any additional legal protection. What is required, in the view of the proponents of this proposal, is adequate state expenditure on field protection and the devolution of rights to rural communities to manage and control elephant for their own benefit.

The Panel of Expert's report in 1992 highly commended the general effectiveness of Zimbabwe's anti-poaching operations, including the emphasis on intelligent work as a component of the law enforcement effort, the collaboration of the wildlife authorities with the Anti-Corruption Commission in Zambia and with the Botswana authorities, and the involvement of the local communities in law enforcement through the CAMPFIRE.

4.1.2. International:

The species is listed in Appendix I of CITES. Botswana, Malawi, Namibia, Zambia and Zimbabwe have entered reservations against this listing. In accordance with Resolution Conf. 4.25 these Parties are continuing to regard the elephant as if it were listed in Appendix II. However, it is noted that Article XV (3) of the Convention provides for Parties entering reservations to be treated as states not Parties to the Convention. Zambia has signalled its intention to withdraw its reservation, but has not yet done so.

4.2 Species Management

4.2.1 Population Monitoring

Aerial surveys have been used to monitor elephant populations in Zimbabwe since 1960, with greater refinement introduced since 1980 (10). From that year the important elephant areas have all been surveyed with varying frequencies (Table 19) using either the stratified transect sample counts, or block sample counts. Budgetary constraints, lack of suitable aircraft and aircraft disasters are some of the reasons why national surveys are not conducted annually.

The transect sample counts involve stratifying the survey area and counting elephant in a calibrated strip width of about 150 m each side of the aircraft. The aircraft is flown along the transect lines chosen at random. Sample coverage ranges from 5-20 % depending on the density of the population being surveyed. In the broken hilly terrain (Zambezi river escarpment and some areas in the Sebungwe region), block count census techniques are employed using either helicopters or fixed wing (Piper Super Cub) aircraft.

Table 19. The frequency of surveys in each of the four major regions of Zimbabwe 1980-1995

YEARS	80	81	82	83	84	85	85	87	88	89	90	91	92	93	94	95
MATEBELELAND NORTH																
Hwange NP Complex																
Matetsi Complex																
Communal Lands																
Forest Areas																
Private Land																
SEBUNGWE REGION																
Matusadona NP																
Chizarira																
Chete S A																
Chirisa S A																
Gokwe District																
Kariba - Omay																
Binga District																
Forest Areas																
ZAMBEZI VALLEY																
Charara SA																
Rifa SA																
Nyakasanga SA																
Mana Escarpment																
Mana South																
Mana/Sapi																
Mana Zambezi																
Sapi Zambezi																
Chewore NW																
Chewore South																
Chewore Escarpment																
Chewore Mountains																
Doma SA																
Dande SA																
Dande CL																
Muzarabani CL																
Mukwishe CL																
GONA-RE-ZHOU																
Gona-re-zhou NP																

Source: Price Waterhouse (10) and DNPWLM records.

Concern has been expressed at the possible risk of counting errors during aerial surveys of the Matebeleland north elephant population in Zimbabwe, and those in the north of Botswana and the Caprivi Strip in Namibia, due to cross-border movements.
This possibility has been eradicated through a system of simultaneous, comparable surveys established in 1989 and co-ordinated most recently by the Southern African Elephant Survey and Monitoring Programme (ELESMAP) funded by the European Union (Table 20).

Table 20. Results of elephant population monitoring in North East Botswana and North West Matebeleland in Zimbabwe: 1992-1995.

Year	North-west Matebeleland	North-east Botswana
1992	41 150 ± 20%	--
1993	27 841 ± 18%	79 000 ±17%
1994	37 442 ± 29%	79 305 ± 21%
1995	30 987 ± 19%	73 815 ± 22%

In 1992, the Panel of Expert's report acknowledged that the elephant surveys were conducted by highly qualified staff and that the department has adequate resources to monitor its national elephant population. The subsequent independent audit by consultants Price concluded that the Zimbabwe authorities have invested a considerable amount of time, effort, and money in the elephant monitoring and management programme -- probably more than any other country in Africa -- and confirmed the validity of the results. Another check on the reliability of surveys since 1989 has been the formal collaboration of the World Wide Fund for Nature (WWF) in several areas of northern Zimbabwe. Finally, in 1995 an independent survey of the Gonarezhou National Parks in south-eastern Zimbabwe was conducted by Dr Iain Douglas-Hamilton who actually estimated slightly more animals than the government survey team assisted by the ELESMAP project.

There is also a comprehensive system to monitor off-takes from the population. All field stations report, on monthly basis, animals killed through all forms of off-take. Safari operators are required by law to make returns to DNPWLM of the animal shot on recreational hunting. TRAFFIC (East/Southern Africa) is assisting in the establishment of a centralised computerised database for the purpose of collating, collecting and analysis of data related to species off-take in Zimbabwe. All elephant killed through PAC and recreational hunting are attributed as part of the annual off-take quota to ensure that the off-take is sustainable.

4.2.2 Habitat Conservation

According to the preamble of the Parks and Wild Life Act (1975) the objectives for which National Parks are established are to preserve and protect the natural landscape and scenery, and to preserve and protect wildlife and plants and the natural ecological stability of wildlife and plants. Until 1989, in order to conserve elephant habitat and to maintain biological diversity, the Department of National Parks and Wild Life Management continually tried to reduce elephant densities in protected areas to levels not exceeding 1 elephant per square kilometre. These target densities were based on models of elephant woodland interactions derived by Craig (29). Unfortunately, since the Appendix I listing it has been impossible for populations reduction operations to be subsidised from the commercial export of ivory and hides and as a result, no large off-takes have taken place. Ecologist now consider several protected areas to be so overstocked that a major die-off elephant is imminent as happened in Gonarezhou in 1992, and is likely to occur in the next severe drought.

Fire is one of the key factor responsible for significant habitat modification. The DNPWLM does have a significant annual budget allocation for fire fighting and the construction and maintenance of access roads and fire guards to control bush fires, but this task is made increasingly difficult as elephants

(together with fire itself) influence habitats to change from woodland to grassland which has a high fuel load.

4.2.3 Management Measures

a) Population Management Measures

At present recreational hunting under quota is the major elephant population management undertaken in Zimbabwe. The quotas are set to maximise the sustainable production of high quality trophies without any detriment to the population. A quota of as little as 0.05-1.0% provides high quality trophies, and quotas of this magnitude are set on the basis of standardised aerial surveys and/or local knowledge. Biological data from the hunt return forms are analysed in order to monitor the sustainability of the off-take. Any trend in mean trophy weight could, for example, indicate a level of recreational hunting not in equilibrium with the elephant population, or a high level of illegal hunting.

Problem animal control (PAC) is another management operation undertaken, mainly in communal lands. Elephants that represent a significant threat to human life and property are destroyed. The numbers of animals destroyed do not reflect on the magnitude of the problems. This operation is one of the most complex issue in elephant management because of the following reasons:

e)communicating reports is difficult as most CAMPFIRE areas are remote;

f)emphasis of action after the damage has been done is not adequate to the affected people;

g)most reported problems are not acted upon. Wildlife department staff may not be available, or they may not have transport.

In view of the above problems, the DNPWLM introduced localised culling or 'disturbance culling' programme in areas associated with high elephant problem reports. Safari operators also assist in problem animal control. The number of elephants killed on PAC is deducted from the hunting quota for the area. Since the introduction of CAMPFIRE in many districts the number of elephant killed on PAC has declined significantly.

The DNPWLM plans regular population reduction operations (as indicated in section 4.2.2) but is restrained due to lack of funds. Wildlife biologists have recommended a reduction of the number of elephants in protected areas to a level of 32,000-35,000 elephants. For practical reasons, not more than 5,000 elephants can be culled in any one year and given a population growth rate of 5 %, it would take 12 years to achieve the reduction.

Translocation was pioneered in Zimbabwe when some elephants were translocated to conservancies and to stock a new Game Park in South Africa. This management measure could be pursued if the demand for elephants is there and the financial resources are available. However, for practical reasons, translocation alone cannot reduce the numbers to desired levels.

The elephant off-takes from the major elephant range regions for the period 1989 to 1995 detailed in Tables 20a-20d. For the period between 1980 to 1989, major culls were done in all the regions to protect the vegetation.. The largest culls took place in Matebeleland North region when the elephant population in Hwange National Park was reduced from an estimated 20,000 animals in 1982 to 13,000 animals in 1986. The last culling operation was undertaken in Gonarezhou National Park in 1992/93 when that Park experienced its worst drought in living memory (Table 20d). In addition to those culled, about 1,400 elephants were translocated to private Conservancies and about 200 were translocated to South Africa to stock a new Game Park.

There has been a substantial increase in the natural mortalities of elephants since 1987. This is also reflected in the amount of ivory originating from natural mortalities in Table 11. This is likely to be the result of increased numbers of animals coupled with a period which has had less than average rainfall.

In addition to the forms of off-take listed in the tables below, there are also minor off-takes through training of professional hunters and some elephants used to be taken through tsetse-fly control programmes.

Table 20a. Off-take of elephants from Matebeleland north population: 1989-1995.

Year	Cull	Safari Hunting	P.A.C	Natural Mortality	Poached	Translocation	Total
1989	0	37	15	15	8	0	75
1990	0	42	7	15	7	0	71
1991	0	23	4	10	6	0	43
1992	0	23	8	8	12	0	51
1993	0	44	5	22	10	0	81
1994	0	33	2	100	6	0	141
1995	0	23	5	23	13	0	64
Total	0	225	46	193	62	0	526

Table 20b. Off-take of elephants from Zambezi Valley population: 1989-1995.

Year	Cull	Safari Hunting	P.A.C	Natural Mortality	Poached	Translocation	Total
1989	0	78	13	53	9	0	153
1990	0	57	19	32	73	0	181
1991	0	70	20	42	41	0	173
1992	38	175*	15	39	38	0	305
1993	0	54	6	51	37	0	148
1994	21	81	30	34	31	0	197
1995	36	74	15	51	12	0	188
Total	95	589	118	302	241	0	1345

1993 off-take (except sport hunting) records for Chewore were not available

* The figure is unusually high because of VIP hunting

Table 20c. Off-take of elephants from Sebungwe population: 1989-1995.

Year	Cull	Safari Hunting	P.A.C	Natural Mortality	Poached	Translocation	Total
1989	7	3	41	5	3	0	59
1990	0	10	21	10	9	0	50
1991	157	13	12	10	7	0	199
1992	201	12	28	25		0	266
1993	0	13	8	4	11	0	36
1994	0	16	7	31	8	0	62
1995	0	14	1	33	2	0	50
Total	365	81	118	118	40	0	722

Table 20d. Off-take of elephants from Gonarezhou population: 1989-1995.

Year	Cull	Safari Hunting	P.A.C	Natural Mortality	Poached	Translocation	Total
1989	0	5	-	-	8	0	13
1990	0	5	3	-	10	0	18
1991	0	5	1	-	12	0	18
1992	379	5	1	-	11	939	1,335
1993	0	8	1	1,521	0	670	2,200
1994	0	9	5	-	1	0	15
1995	0	10	4	-	11	0	25
Total	379	47	15	1,521	53	1,609	3,624

Note: where there is a dash (-) there was no data available

b) Mechanism for reinvesting revenues in elephant conservation

All the revenues generated from wildlife products derived from natural mortality and management activities in the Parks and Wild Life Estate will be retained by the Department and used by field station located in the elephant range areas for elephant conservation. The Government of Zimbabwe in January 1996 approved the establishment of the Parks and Wild Life Conservation Fund under section 30 of the Audit and Exchequer Act. (Chapter 168). This Fund will enable the DNPWLM to retain its present and future revenues to undertake measures required for improving efficiency within the Parks Estate. The DNPWLM has undertaken to use the revenues derived from sale of elephant products for financing illegal activities monitoring and maintaining sustainable artificial game water supplies. Maintenance of sustainable water supplies imposes a serious budgetary requirement.

Revenues from wildlife products derived from natural mortality and management activities in those communal lands with Appropriate Authority under the Campfire programme will be retained by the Rural District Councils in their Campfire fund and used for conservation activities and for providing development benefits to rural people in line with the Campfire guidelines.

4.3 Control Measures

4.3.1 International Trade

The following mechanisms are in place to control international trade of live specimens or trophies of elephants and other wildlife species:-

At the ports of exit, CITES and Veterinary Import Permits are checked by Customs and frequently the shipments are physically inspected. In case of doubt, Customs may call upon a DNPWLM officer to assist and provide expert information. Additional controls are carried out by the National Economic Conduct Inspectorate, a unit in the Ministry of Finance, Economic Planning and Development. CITES export permits are checked by Customs who stamp the original and return a copy to DNPWLM headquarters. Each Customs Office has a copy of the Control of Goods (Import and Export) (Wild Life) Regulations which apply in this sector of trade.

Permits for exports of raw ivory (from recreational hunting only) are issued by the Head Office of DNPWLM in Harare. Two field stations, Matetsi Safari Headquarters and Marongora are authorised to issue export permits, but for recreational hunting trophies only.

When issuing Veterinary Health Certificates for the export of raw ivory, the Department of Veterinary Services requires the applicant to present valid CITES export permit..

The fraud squad Unit of the Zimbabwe Police assists the Investigations Branch with respect to offences in trafficking of wildlife products.

In general the 1992 Panel of Experts found Zimbabwe's international trade controls to be adequate but encountered problems of trade controls in the countries of import.

The are plans to implement a regional control mechanism through SACWM, possibly incorporating the Lusaka Agreement.

Proposed Trade Control Measures

The following is the detailed list of precautionary measures to be an integral part of any transfer of the species to Appendix II to which Zimbabwe and its trading partner commit according to the provisions of Resolution 9.24 (4) (d).

a) Zimbabwean population only

Only the Zimbabwean elephant population is included in this proposal. Ivory of Zimbabwean origin held in other countries or in private ownership are excluded from this proposal.

b) Withdrawal of Reservation

Zimbabwe will withdraw the reservation on *Loxodonta africana* within 90 days of acceptance of the transfer to Appendix II by the Parties to the Convention.

c) A quota for registered stocks of raw ivory only

The export quota will refer only the stock of whole ivory tusks in the central ivory store registered and under the authority of the Department of National Parks and Wild Life Management on 31st October 1996.

There will be no export of ivory of unknown origin or where it is known to come from outside Zimbabwe.

d) Ivory to be marked with a standard system

In accordance with Resolution Conf. 9.16 (g), all whole tusks in the stockpile for export will be individually marked with punch-die marks and the marks correlated with a register (computerised database) entry showing area of origin.

All other ivory will also be individually marked and registered to ensure that there can be no mixing of unknown or foreign ivory.

e) Sale through one single centre

All ivory sales, subsequent packing in sealed containers and dispatch will take place only from the government's central ivory store at the Headquarters of the Department of National Parks and Wildlife Management in Harare.

f) Number of ivory shipments limited

For ease of monitoring and control there will only be two shipments of ivory within the downlisting period, one in 1998 and another in early 1999 before the 11th C.O.P.

g) Direct export of ivory to only one importing country (Japan)

Export permits will only allow shipment to one importing country (Japan) and shipments will have to be made direct with no transit, other than that which is geographically unavoidable. This proposal is

structured in such a way as to keep on Appendix I, and out of legal trade, ivory of Zimbabwean origin which may exist in stocks anywhere in the world, other than the Government of Zimbabwe's ivory store.

h) Importing country to have internal controls and to agree not to re-export

Japan has new, legal internal trade controls for ivory and commits to allow no re-export of ivory imported in terms of newly imported ivory. The details of this comprehensive legislation are given in Annex 3.

i) Independent monitoring

Enforcement personnel from CITES Secretariat, Parties agreed in advance by Zimbabwe and the CITES Secretariat and NGOs working for the Secretariat, may be present at the sale, packing and shipping process to check all details and the inventory. Similar inspection may take place when the containers are unloaded and the tusks distributed in the importing country.

j) Funds from ivory sales to be returned Conservation or used for the provision of conservation incentives

All net revenues after sale will be returned exclusively to conservation activities. They will be paid into either the Management Authority's legal Statutory Fund, or to the Rural District Councils with Appropriate Authority administering CAMPFIRE, depending to whom the tusks belong.

k) Safeguards against abuse

Should the Standing Committee be made aware of the abuses of the downlisting, or a failure of the Zimbabwe Management Authority or the importing Party to adhere to the terms of proposal as agreed by the COP, the Depository (Swiss) Government has agreed to prepare a proposal for re-transfer to Appendix I to put before the parties under the postal procedure of article XV paragraph 2.

Zimbabwe would submit a further proposal to COP 11 that would be aimed at establishing an annual export quota base on actual ivory production.

Zimbabwe will not trade with any other Part or in greater volumes than agreed to by COP, without submitting such proposal to COP.

l) Monitoring effects of downlisting

Zimbabwe will cooperate with neighbouring countries in the monitoring of elephant populations trends and illegal trade. Zimbabwe will also assist credible organisations involved in monitoring population and trade patterns in the neighbouring countries within its means.

4.3.2 Domestic Measures

Zimbabwe was acknowledged by the 1992 Panel of Experts as having an adequate system of marking and registration for ivory and Zimbabwe follows the recommendations of Resolution Conf. 9.16, including those on the registration of merchants, carvers and, additionally, retailers.

All ivory is marked within 14 days of acquisition using the CITES approved system. Under the Parks and Wildlife Act, 1975, as amended 1st August 1991, the sale and the purchase of any live animal or trophy are subject to a permit. Export permits for raw ivory are issued by the regional offices and export permits for worked items by the retailers who have to send a copy of each permit to the headquarters.

According to the Laws of Zimbabwe, any person who is guilt of an offence involving the unlawful possession of, or trading in, ivory shall be liable, on a first conviction, to imprisonment for a period of not

less than five years nor more than fifteen years, or, on a second or subsequent conviction, to imprisonment for a period of not less than seven years nor more than fifteen years.

The import and transit of elephant products are covered in broad terms under the Control of Goods (Import and Export) (Wildlife) Regulations which require veterinary import and transit permits for infectious material and portions of carcasses. Elephant meat, unprocessed ivory, bones and hide are therefore included. Under the Goods (Import and Export) (Wildlife)Regulations, 1982, the import and export of raw and worked ivory is subject to a permit. Import permits make reference to veterinary permit requirements. Zimbabwe does not allow the commercial importation of raw ivory. Export provisions would apply fully to any ivory being re-exported.

The general policy is not to issue any import permits for unprocessed animal products from countries to the north, including Mozambique and Angola. The Control of Goods (Import and Export)(Wild Life) Regulations include a copy of the CITES appendices.

The 1992 Panel of Experts' report noted that Zimbabwe had not formally complied with the recommendations of Resolution Conf. 7.4 on Control of Transit. There is no legal provision which explicitly requires that CITES goods in transit must be accompanied by valid CITES documentation, although in practice, transit would be treated as import and re-export. For the introduction of ivory into a bonded warehouse, a permit is required. In the case of duty free shops, the imports are controlled but not the exports.

5. Information on Similar Species

There are no similar species in Africa, but ivory from *Hippopotamus equinus* is also found in trade. However, this is readily recognisable from elephant ivory. The Asian elephant (*Elephas maximus*) is listed in Appendix 1 of CITES. The proponents believe that, with the precautionary measures adopted, it is unlikely that this proposal to list the Zimbabwe population of the African elephant in Appendix II will prejudice the survival of the Asian elephant. The trade controls advanced in section 4.3.1 are considered sufficiently rigorous to exclude any Asian elephant ivory at the point of export. The measures included in this proposal for identifying the origin of ivory, if applied by an importing state, should detect any Asian ivory mixed with African ivory. The two types of ivory are readily recognisable according to standard texts on ivory identification.

6. Comments from Countries of Origin

Comments from Other Range States as a result of consultation.

As noted above, the largest part of the elephant population of southern Africa is contiguous between Zimbabwe, Botswana and Namibia, although only small segments of the population actually cross the Zimbabwe border. This proposal is submitted jointly by Botswana, Malawi, Namibia and Zimbabwe who, at the July 1996 meeting of the Southern African Convention for Wildlife Management (SACWM) reaffirmed their support for all its provisions.

There are also small population overlaps with Mozambique and Zambia and possibly Angola. Comments are being sought from these range states. However, it must be noted that Article 1(a) of the Convention provides for a "geographically separate population" to be recognised as a species population. This proposal for transfer is limited to the geographical population of Zimbabwe therefore the proponents are not required formally to consult with any other range states for the species in terms of Resolution Conf. 8.21. The submission of the South African proposal for the transfer of *Loxodonta africana* at C.O.P 9 set the precedent in this regard.

Notwithstanding the above, the proponents undertook full consultation with other range states. The proposals from the proponents were submitted a full six months earlier than required. In terms of the conditions established in Resolution Conf. 7.9 this allowed time for the Panel of Experts to meet and make their review before the Meeting of the African Elephant Range States in Dakar, Senegal in November 1996. The proponents made a joint presentation of their proposals and the comments from other range states were fully taken into account.

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Annex 1

Ivory Stock Database Management System Project Documentation

A Collaborative Project Report on the Ivory Stock Database Management System

Between

The Zimbabwe Department of National Parks and Wild Life Management (DNPWLM)

and

TRAFFIC East/Southern Africa

A TRAFFIC East/Southern Africa Report, November 1996
Ashish Bodasing, Programme Officer

Funded by United States Agency for International Development

USAID Grant No. 690-0283-A-00-5950—00

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Output 3 : Database designed
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1. BACKGROUND

TRAFFIC East/Southern is a sub-grantee within USAID's Initiative for Southern Africa, a comprehensive grant programme administered by IUCN-The World Conservation Union's Regional Office for Southern Africa (IUCN-ROSA). Entitled "Regional Networking and Capacity Building", the so-called NETCAB programme features TRAFFIC as the lead implementing agency to improve wildlife trade controls of the Convention on International trade in Endangered Species of Wild Fauna and flora (CITES) in the SADC (Southern African Development Community) region.

Through an evaluation process, TRAFFIC identified Zimbabwe's wildlife sector as a collaborating partner for strategic capacity-building and training exercises. Within this context, TRAFFIC was invited to assist Zimbabwe's Department of National Parks and Wild Life Management (DNPWLM) with information management needs associated with the elephant ivory and rhinoceros horn stocks held in DNPWLM's strong room in Harare. This report outlines TRAFFIC's initial activities and planning for the project.

From 11-14 June 1996, Tom Milliken, Director of TRAFFIC East/Southern Africa, conducted a preliminary review of the current procedures and requirements of the Department. Ashish Bodasing, TRAFFIC Programme Officer, was then assigned to design and implement the "Ivory Stock Database Management System". As a first step, the Programme Officer conducted a workshop with 11 staff members. Ideas and concerns from staff were raised for resolution with the Director of DNPWLM Mr Willis Makombe and a preliminary plan of action was presented to the Director for approval. The TRAFFIC Officer requested authorisation from Mr Makombe to proceed with the project which was granted. Having received authorisation, all previous activities were assimilated into this project document.

2. OBJECTIVES OF THE WORKSHOP

The objectives of the workshop were:

- to develop goals and objectives for the development of an Ivory Database Management System (IDMS);
- to identify activities required to meet the objectives and goals; and
- to develop workplans and milestones for the project.

3. LIST OF WORKSHOP PARTICIPANTS

The following individuals attended the workshop:

1.	Mr Onisimo Chigaramumba	Data Capture Officer
2.	Mr Alex Mananzwa	Data Capture Officer
3.	Mr Benson Mbirinya	Data Capture Officer
4.	Mr Lisset Nguruve	Systems Analyst
5.	Ms Marian Rigava	Ivory Store Supervisor
6.	Mr Gengezha	Game Scout
7.	Mr Gadzai	Game Scout
8.	Mr Moses Gomwe	Senior Ranger Marketing
9.	Dr Don Heath	Ecologist Utilisation
10.	Mr Stix Chimuti	Research Survey
11.	Dr Cecil Machena	Deputy Director Research

4. PROJECT STRATEGY

GOAL (Development Objective)	1. to enhance the efficiency of the department to manage the registration and movement of ivory 2. to enhance the monitoring of sales and final disposition of ivory 3. to monitor conservation trends 4. to enhance law enforcement 5. to promote sustainable use
PURPOSE (Immediate Objective	1. to develop an accurate computerised record keeping process for monitoring of the ivory Stock 2. to enhance the current system of control and monitoring of ivory movement 3. to enhance the monitoring and accountability of ivory sales 4. to identify and provide statistical data required for research 5. to identify and provide information required for management decision-making purposes

OUTPUTS	
Phase I	1. Function and model of IDMS developed 2. Computer hardware and printer installed 3. Database designed 4. Data captured 5. Database developed and implemented 6. Database integrated with ivory registration 7. Database integrated with ivory sales 8. Database integrated with ivory stocktaking 9. Effective project management established
Phase II	10. Procedures introduced for auditing purposes 11. Database integrated with hunting data 12. Database integrated with law enforcement data 13. Database used to monitor final disposition of ivory
Phase III	14. Workplan developed to identify and meet needs of Research 15. Workplan developed to identify and meet needs of Management 16. Enhanced system evaluated and required action taken
ACTIVITIES	See following Workplans

5. WORKPLANS

PROJECT WORKPLAN 1996-1997

ACTIVITY/SUB-ACTIVITIES	MILESTONE [redacted]	TIME FRAME 1996 III	TIME FRAME 1996 IV	TIME FRAME 1997 I	TIME FRAME 1997 II	RESPONSIBLE	REMARKS/STATUS
Output 1: Function and model of IDMS developed							
1.1 Workshop with DNPWLM staff	05 July 1996					AB	
1.2 Document manual system	09 July 1996					AB	
1.3 Establish function of IDMS	09 July 1996					AB	
1.4 Develop model of IDMS	09 July 1996					AB	
Output 2: Computer hardware and printer installed							
2.1 Obtain 2 computers and printer from TEI	22 July 1996					DH	
2.2 Install in Ivory Stockroom	22 July 1996					LN	
2.3 Fix electricity supply in Ivory Stockroom	25 July 1996					Mr Madinga	
Output 3: Database designed							
3.1 Relational database design drawn	11 July 1996					AB	
3.2 Field structure drawn up	11 July 1996					AB	
Output 4: Data captured							
4.1 Report documenting procedures for data capture developed	23 July 1996					AB	
4.2 Certificate numbers captured in Ivory Stock Register for new registration	25 July 1996					DCO's	
4.3 Ivory register data for open Part Lots 1524 to current entered.	30 October 1996					DCO's, HS, MR, LN	
4.4 Data Reconciliation during Stocktake	12 December 1996					MR	
4.5 Parallel update for manual and computerised stock registers begins	12 December 1996					MR	
4.5 Editing of Stock data	12 January 1997					DCO's, HS, MR,	

						LN	
4.6 Data from station return form for open Part Lots 1524 to current entered	12 January 1997					DCO's, HS, MR, LN	

ACTIVITY/SUB-ACTIVITIES	MILESTONE	TIME FRAME				RESPONSIBLE	REMARKS/STATUS
		1996		1997			
		III	IV	I	II		
4.7 Data from closed Part Lots 1524 to current entered	20 February 1997					DCO's, HS, MR, LN	
4.8 Data from station return form for closed Part Lots 1524 to current entered	20 March 1997					DCO's, HS, MR, LN	
4.9 Data from closed Part Lots 1 to 1523	20 April 1997					DCO's, HS, MR	
4.10 Data from station return form for closed Part Lots 1 to 1523 entered	20 June 1997					DCO's, HS, MR, LN	
4.11 Certificate number data captured	30 June 1997					DCO's, HS, MR	
Output 5: Database developed and implemented							
5.1 Coding	10 January 1997					AB	
5.2 Data merged with database	14 January 1997					AB	
5.3 Testing and modification	15 January 1997					AB	
5.4 Hand-on training on live system	16 January 1997					AB	
Output 6: Database integrated with ivory registration							
6.1 Training provided for on-line registration of ivory and production of reports	17 January 1997					AB	
6.2 On-line registration of ivory commences	18 January 1997					AB	
Output 7: Database integrated with ivory sales							
7.1 Integrate sales with Finance Department	19 January 1997					AB, Finance	
7.2 Training provided for on-line sales of ivory and production of statements	19 January 1997					AB	
7.3 On-line sales of ivory commences	19 January 1997					MR, AB	

7.4 Needs of Marketing identified and met	21 January 1997					MR, AB	

ACTIVITY/SUB-ACTIVITIES	MILESTONE	TIME FRAME 1996 III	1996 IV	1997 I	1997 II	RESPONSIBLE	REMARKS/STATUS
Output 8: Database integrated with ivory stocktaking							
8.1 Stocktaking requirments identified	28 February 1997					MR, AB	
8.2 Reports/Query features designed and implemented	28 February 1997					MR, AB	
Output 9: Effective project management established							
Identify personnel and their duties and responsibilities	31 December 1996					HS	
Establish supervision by senior management	30 November 1996					HS, WM, CM	
Establish monitoring and evaluating procedures	31 December 1996					HS, AB	
Establish formal reporting lines and procedures	31 December 1996					HS, AB	
Define and submit project status reports on a regular basis	17 January 1997					HS, AB	
Draw up Memorandum of Agreement between TRAFFIC and DNPWLM	17 January 1997					AB, Mr. Manyonganise	
Output 10: Procedures introduced for auditing purposes						AB, Finance	
Output 11: Database integrated with hunting data						DH, AB	
Output 12: Database integrated with law enforcement data						GT, AN, AB	
Output 13: Database used to monitor final disposition of ivory						MR, AB	
Introduce reporting for history and current status of ivory						AB, MR	

ACTIVITY/SUB-ACTIVITIES	MILESTONE	TIME FRAME 1996 III	1996 IV	1997 I	1997 II	RESPONSIBLE	REMARKS/STATUS
Output 14: Workplan developed to identify and meet needs of Research						CM, DH, AB	
Workshop conducted to identify Research needs						CM, DH, AB	
Methods to disseminate data/reports established						CM, DH, AB	
Format of data/reports determined						CM, DH, AB	
Frequency of data/reports determined						CM, DH, AB	
Data/report production implemented						CM, DH, AB	
Output 15: Workplan developed to identify and meet needs of Management							
Workshop conducted to identify Management needs						WM, CM, HB, GT, AB	
Methods to disseminate reports established						CM	
Format of reports determined						CM	
Frequency of reports determined						CM	
Report production implemented						AB	
Output 16: Enhanced system evaluated and required action taken	October, January, April					All staff	

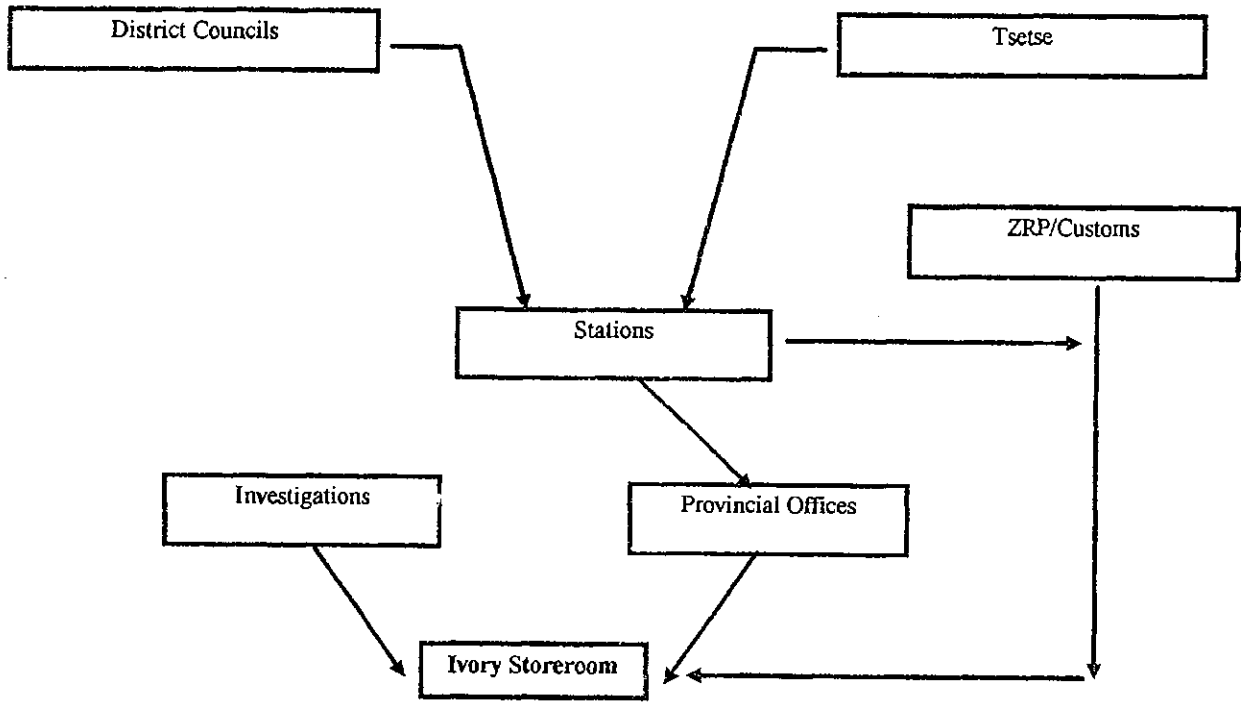
Abbrev.	Full Name	Abbrev.	Full Name
AB	Mr Ashish Bodasing	**GT**	Mr Glen Tatham
AN	Mr Austin Ndlovo	**HS**	Mr Headman Sibanda
CM	Dr Cecil Machena	**LN**	Mr Lisset Nguruve
DH	Dr Don Heath	**MR**	Mrs Marian Rigava
DCO	Data capture officers		
DNPWLM	Department of National Parks and Wild Life Management		

OUTPUT 4.1
PROCEDURES FOR DATA CAPTURE

Activity	Data to be captured				Decription	Due Date
4.2 Ivory register data for open Part Lots 1524 to current entered.	Part Lot	C	5		Pat Lot number allocated	30 August 1996
	Stationno	C	5		Number assigned by Station to a tusk e.g. S2435	
	Weight	N	6	2	Weight as per Ivory Stockroom scale	
	Length	N	6	2	Length as per Ivory Stockroom measurement	
	Serialno	C	8		Ivory Stockroom Stamp e.g. ZW960032	
	Authority	C	15		Ivory owner e.g. Parks/Name of district council	
	Remarks	C	30		Comments on ivory	
	Buyer	C	30		Name of purchaser if sold e.g Sibanda VS	
	Datesold	D	8		Date ivory was sold	
	Receiptno	C	6		Receipt number if ivory sold	
	Certificate	C	6		Certificate number	
4.3 Data from station return form for open Part Lots 1524 to current entered	Stationno	C	5		Number assigned by Station to a tusk e.g. S2435	03 September 1996
	Serialno	C	8		Ivory Stockroom Stamp e.g. ZW960032	
	Cdeath	C	30		Reason for death of elephant	
	Date	D	8		Date elephant/ivory killed/found	
	Locstat	C	20		Locstat where killed or found	
	Sex	C	1		Sex e.g. (M)ale, (F)emale, (U)nknown	
	Remarks	C	30		Additional comments	
4.4 Certificate numbers captured in manual Ivory Register for new registrations of ivory	Certificate number to be included in ivory register				Certificate number	25 July 1996
4.5 Data from closed Part Lots 1524 to current entered	As in 4.2				As in 4.2	31 October 1996
4.6 Data from station return form for closed Part Lots 1524 to current entered	As in 4.3				As in 4.3	31 October 1996
4.7 Data from closed Part Lots 1 to 1523	As in 4.2				As in 4.2	31 January 1997
4.8 Data from station return form for closed Part Lots 1 to 1523 entered	As in 4.3				As in 4.3	31 January 1997
4.9 Certificate number data captured (backlog of certificate number not included in register	Serialno	C	8		Ivory Stockroom Stamp e.g. ZW960032	28 February 1997
	Certificate	C	6		Certificate number	

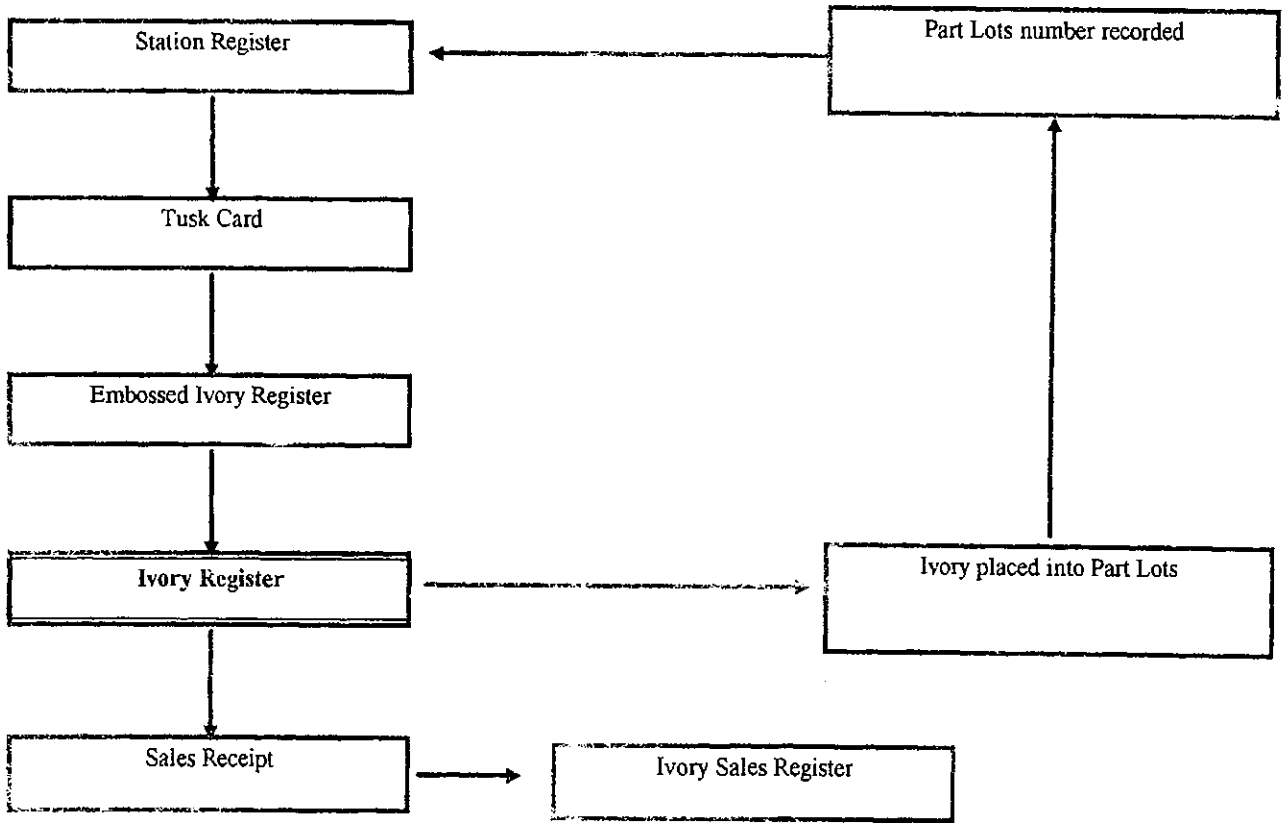
APPENDIX I

Ivory Marketing System



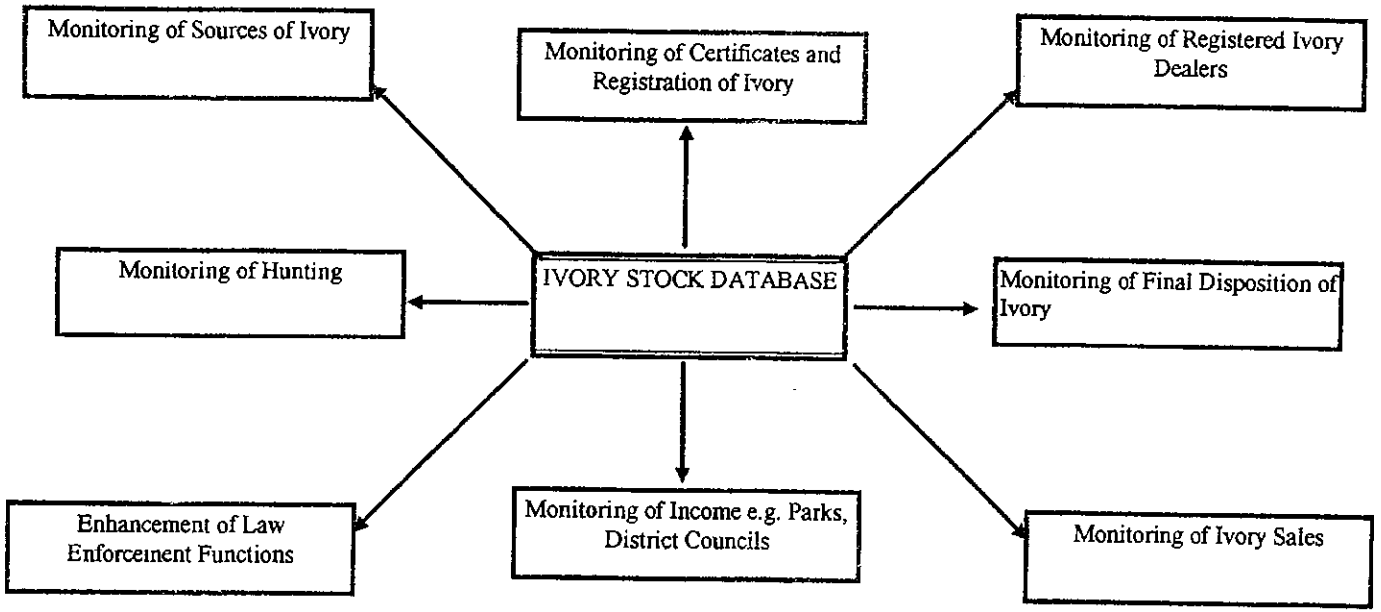
APPENDIX II

Ivory Recording System



APPENDIX III

Proposed Functions of the Ivory Database Management System



APPENDIX IV

Part Lot Data Entry Progress Indicator Sheet : _____

Date	No. of Part Lots Entered	Signature Supervisor	Comments by Supervisor	Action Taken

APPENDIX V

Station Register Data Entry Progress Indicator **Sheet : _____**

Date	No of Station Register Forms entered	Signature Supervisor	Comments by Supervisor	Action Taken

APPENDIX VI

Database Structure for Primary Data Capture

Structure for database: C:\IDMS\REGISTER.DBF
Data Source: Ivory Registers
Number of data records: 0
Date of last update : 25/07/96

Field	Field Name	Type	Width	Dec	Index
1	Part_Lot	Character	5		Y
2	STATIONNO	Character	5		N
3	WEIGHT	Numeric	6	2	N
4	LENGTH	Numeric	6	2	N
5	SERIALNO	Character	8		Y
6	AUTHORITY	Character	15		N
7	REMARKS	Character	30		N
8	BUYER	Character	30		N
9	DATESOLD	Date	8		N
10	RECEIPTNO	Character	6		N
11	CERTIFICAT	Character	6		N
** Total **			126		

Structure for database: C:\IDMS\STATION.DBF
Data Source: Register of elephants killed or carcases found
Number of data records: 0
Date of last update : 25/07/96

Field	Field Name	Type	Width	Dec	Index
1	STATIONNO	Character	5		N
2	SERIALNO	Character	8		Y
3	CDEATH	Character	30		N
4	DATE	Date	8		N
5	LOCSTAT	Character	20		N
6	SEX	Character	1		N
7	REMARKS	Character	30		N
** Total **			100		

APPENDIX VII

Technical Source Notes for Data Capture Officers

To load dBASE IV to capture IDMS data

At the dos prompt (C:\>) type in
CD \IDMS and press <ENTER>
DBASE and press <ENTER>

Useful dBASE IV Commands

use <filename>	Opens the filename specified
use	Closes the current open file
Append	Add records to the database
Edit	Displays the current record for editing
Browse	Displays multiple records in the database for editing
go top	Goes to the first record in the database
go bott	Goes to the last record in the database
<CONTROL-U>	Deletes the current record (Toggle keystroke)
<CONTROL-END>	Saves records and exits EDIT or BROWSE modes
<CONTROL-PgUp>	Goes to the first record in the database
<CONTROL-PgDn>	Goes to the last record in the database
<ESCAPE>	Cancel changes in the current record and return to dot prompt.
<PgUp>	Displays the previous record (EDIT mode)
	Displays the next 20 records (BROWSE mode)
<PgDn>	Displays the previous record (EDIT mode)
	Displays the next 20 records (BROWSE mode)

NOTE : <CONTROL> commands are executed by holding down the <CONTROL> key and pressing the required combined key.

Annex 2

COUNTRY: ZIMBABWE

1. CITES LEGISLATION

Zimbabwe has been a Party to CITES since 17 August 1981. The Control of Goods (Import and Export) (Wild Life) Regulations of 1982, were made under section 3 of the Control of Goods Act (Chapter 280) in order to implement the provisions of the Convention in Zimbabwe.

A. Control of Goods (Import and Export) (Wild Life) Regulations 1982 (No.1) (S.I. 557 of 1982)

a. International trade restrictions

The primary power to issue permits and certificates is conferred upon the Director of National Parks and Wild Life Management, who may issue directions authorising the Controller of Customs and Excise to issue such documentation (section 5(2)). The Director and the Controller are thus effectively designated as the Management Authority for the purposes of CITES, although the term is not expressly used. Section 10(2) permits the Director and Controller to delegate any or all of their powers to issue permits and certificates to any officer of their respective departments. No Scientific Authority is designated under the Regulations.

Section 3 lays down a general prohibition on the import into or export from Zimbabwe of any "wild life" or trophy of "wild life" except in accordance with either a certificate issued in the terms of section 5 by the Director or Controller, or an open general permit. "Wild life" is defined as all organisms listed in the Second Schedule to the Regulations. Parts I, II and III of this Schedule list all species listed in Appendices I, II and III of CITES respectively, including plants, whilst Part IV of the Schedule designates other species of which more details are given in part 3 below.

An open general permit may only be issued by the Minister of Natural Resources and Tourism in respect of species listed in Parts III or IV of the Second Schedule (section 4). The Minister, Director and Controller, as the case may be, are required to have regard to the obligations of Zimbabwe under CITES in the exercise of their duties.

Section 5 reproduces the permit provisions of CITES almost verbatim, except for one significant discrepancy. No permit may be issued for the export of "wild life" specified in Part I, or any trophy thereof, unless the Director or Controller is satisfied that an import permit has been *or will be* granted for it by an appropriate authority in the country to which it is being exported (section 5(4)). The words in italics do not appear in the corresponding provision of CITES (Article III 2(d)). This means that export permits for Appendix I species may expressly be issued in contravention of the Convention. Specimens of Appendix I species may therefore be lawfully exported from Zimbabwe and thereafter detained at Customs in the country of import due to the lack of an import permit.

In respect of exports of "wild life" specified in Part I or Part II (equivalent to CITES Appendices I and II), the Director must also be satisfied that the export will not be detrimental to the survival of the species concerned, that the "wild life" or trophy concerned has not been obtained in contravention of any law, and that the conditions of export of a live specimen of "wild life" minimise the risk of injury or cruelty to that specimen.

Section 3(1)(b) provides that no import permit shall be issued in respect of "wild life" specified in Part I or II (corresponding to CITES Appendices I and II), or any trophy thereof, without an export or re-export permit from the country of import. No Part III (i.e. CITES Appendix III) specimen or trophy may be imported without a certificate of origin or other document indicating the country of origin and, where the latter is the country which entered the species on Appendix III, an export permit from the appropriate authority. The grant of import permits for Part I (i.e. Appendix I) or Part V specimens is authorised where the Director or Controller is satisfied that an export or re-export permit has been or will be granted for the specimens by an appropriate authority in the country from which the specimens are being imported (section 5(3)). Part V lists species which are treated as CITES Appendix I species for the purposes of import into Zimbabwe.

The Director must also be satisfied that the import will not be for purposes detrimental to the survival of the species concerned; that the wild life or trophy concerned will not be used for primarily commercial purposes and that the proposed recipient of a live specimen of wild life is suitably equipped to house and care for it. The latter conditions are also broadly applicable to the grant of permits for the import of species which have been taken from a marine environment not under the jurisdiction of any State (section 5(3)).

Section 5(6) prohibits the issue of re-export permits for Part I species or trophies unless the Director or Controller is satisfied that an import permit has been or will be granted for it by an appropriate authority in the country to which it is being exported, and that the specimen in question was imported into Zimbabwe in accordance with the provisions of CITES. The other conditions applicable are similar to those for the grant of export and import permits.

Section 3(2) exempts from import and export controls wild life or trophies acquired before they were covered by the CITES provisions; wild life bred in captivity or artificially propagated; herbarium and museum specimens imported or exported by approved museums, herbariums, scientific organisations or scientists; and trophies that qualify as "personal effects" as defined by the amended Regulations (S.I. 612 of 1982).

b. Possession and national trade restrictions

No such restrictions are mentioned in the Regulations.

2. OTHER APPLICABLE LEGISLATION

B. Parks and Wild Life Act 1975 as amended at 1 August 1990

Parks and Wild Life (General) Regulations 1990

These texts are only applicable to indigenous species of fauna and flora, which of course includes CITES-listed species.

a. International trade restrictions

Regulation 66 prohibits the import or export of the trophy of any animal without a trophy dealer's licence, or of raw ivory without an ivory dealer's licence issued pursuant to Regulation 67. Any person importing unregistered raw ivory or rhinoceros horn into Zimbabwe must produce it for registration within twenty-four hours (Regulation 72) to a

specified officer, who may issue a certificate of ownership if satisfied that the specimen has been lawfully imported.

An animal is defined as any vertebrate animal other than a domestic animal or fish.

b. Possession and national trade restrictions

The Act provides that animals and indigenous plants specified in the Sixth and Seventh Schedules are designated as "specially protected".

It is prohibited under section 36 to hunt, keep in one's possession, sell or otherwise dispose of any live specially protected animal, or the meat or trophy thereof, without a permit issued by the Minister in the interests of science, conservation or the management and control of animal populations. The trophy of any specially protected animal killed or found dead is deemed to be a State trophy (section 37A).

Section 47 prohibits the hunting or sale of any live animal or the trophy of any animal without a permit issued under section 65, whilst the sale of unlawfully hunted meat is forbidden under section 58. An animal is defined as any wild vertebrate other than fish, and is not limited to indigenous species. The definition therefore covers all CITES species except for fish, invertebrates and plants.

Section 61 provides that no person shall manufacture any article from a trophy or process, sell, donate or otherwise dispose of any trophy or article manufactured from a trophy which has been obtained from an animal hunted in contravention of the Act's provisions. Section 62 also prohibits the purchase of a live animal or trophy other than from a shop, unless the person is satisfied that the seller has authority under the Act to make the sale, or that the animal in question was born and raised in captivity.

Section 84 provides that the possession of any animal or fish or the meat and trophy of a freshly killed animal shall be *prima facie* evidence of unlawful hunting or taking by that person. The possession by any person of ivory or rhinoceros horn shall, unless the contrary is proved, be evidence against such person that the ivory or horn was not registered under the Regulations. The burden of rebutting such a presumption is on the accused.

The sale and purchase of specially protected plants without a permit from the Minister is prohibited. A permit may only be issued to dealers trading in such plants in the course of their business or to members of recognised horticultural societies (section 42). Regulation 48 authorises the issue of temporary permits for the sale or transfer of specially protected indigenous plants, which must be accompanied by a certificate of sale or transfer as appropriate. It is forbidden to accept such a plant, subject to certain exceptions, without such a certificate (Regulation 49).

Furthermore, section 45 prohibits the sale without a permit of any indigenous plant picked on any land. The Minister may, where he considers this desirable in the interests of conservation, prohibit the picking and sale of such plants in a specified area and for a period which may be specified or indefinite.

Finally, section 79 prohibits any person from carrying on the business of catching fish in any waters and selling them without a permit.

Section 116 of the Act confers extensive power on the Minister to make regulations concerning, *inter alia*, the regulation and control of the acquisition, possession and sale of trophies, the meat and offal of any animal, the import and export of animals, fishes, plants and other organisms and trophies to conserve the wild life, fish and plants of Zimbabwe or to comply with its obligations in terms of any treaty, convention or other international agreement.

The Regulations of 1990 contain detailed rules on who may manufacture trophies and ivory products and establish a comprehensive licence system. Regulation 66 prohibits the manufacture or processing of any trophy for sale or reward without a trophy dealer's licence and, more stringently, the manufacture or processing of any ivory, whether for sale, reward or otherwise, without an ivory dealer's licence. The purchase or sale of any trophy or raw ivory, from persons authorised under the Act to buy or sell, is also subject to possession of these permits. The issue of permits by the Director is governed by regulation 67. Detailed terms and conditions for the required permits are set out in regulation 69 and dealers are required to keep detailed registers pursuant to the provisions of regulation 72. Ivory manufacturers must also retain and record the dust resulting from the manufacture and processing of ivory, and the provisions of the Regulations also apply to any sale of such dust.

Regulations 76 to 85 set out extensive provisions for tracking ivory within the borders of Zimbabwe. Any person who acquires or comes into possession of any unregistered raw ivory or rhinoceros horn must produce it for registration within fifteen days (Regulation 72) to a specified officer, who may issue a certificate of ownership if satisfied that it has been lawfully acquired. The officer may retain the ivory or horn pending production of evidence of lawful acquisition and, if this is not produced within six months of such detention, the ivory or horn concerned shall be registered as a State trophy (regulation 79).

Ivory manufactured pursuant to an ivory manufacturer's licence must be engraved with its register reference and the identifying letters of the licence holder. Any person selling or transferring registered raw ivory must endorse the certificate of ownership with the details of the new owner. This certificate must be returned to the Director within fourteen days of any loss, theft, export, processing, manufacture or destruction (regulation 81).

Subject to the exemption in regulation 85 referred to below, it is prohibited to acquire, possess, sell or transfer any raw ivory that has not been registered within the fifteen day period, unless the raw ivory was lawfully taken from a lawfully hunted animal or from a dead animal or was lawfully imported into Zimbabwe, or any piece of manufactured ivory exceeding 200 grams in mass unless it is duly marked. It is for the accused to prove the lawfulness of such acquisition and that registration has been duly made (regulation 82).

There is an absolute prohibition on the purchase, sale, manufacture, processing, carving or embellishment of rhinoceros horn (regulation 83). It is similarly forbidden to possess or transfer any horn which has not been registered (regulation 84), subject to the exemption below.

Exemptions to the above provisions are made by regulation 85 for the acquisition or possession of ivory and horn by museums and scientific and educational institutions.

3. CITES SPECIMENS COVERED BY THE LEGISLATION

A. Control of Goods (Import and Export) (Wild Life) Regulations 1982 (No.1) (S.I. 557 of 1982)

a. Taxonomic Groups

"Wild life" is defined by section 2 of the Regulations as any organism, whether alive or dead, and the egg or seed of any organism, referred to in the Second Schedule, and any portion whatsoever of any such organism, other than a trophy, whether such portion is processed or not.

The Second Schedule (as amended by S.I. 144 of 1984) is divided into several Parts, of which Parts I, II and III are equivalent to Appendices I, II and III of CITES. Parts I and II are divided into sections A and B: section A lists those species of the relevant Appendix which occur or may occur in Zimbabwe, whilst Section B reproduces the Appendix in its entirety.

Part IV lists wild life which is not specified in Parts I to III of the Schedule, namely non-CITES species in which trade is nevertheless to be controlled. This includes all vertebrate and invertebrate species, other than fish and crustaceans, normally existing in a wild state; live fish and live crustaceans; and all specially protected indigenous plants as specified in the Parks and Wild Life Act 1975, as amended, that have not been artificially propagated. Initially, Part IV of the Second Schedule only included all vertebrates and invertebrates (other than fish and crustaceans) of species usually existing in a wild state within Zimbabwe. The words, "within Zimbabwe", were deleted by an amendment to the Control of Goods Regulations of 1984.

Part V lists a further three taxa of wild life (African elephant, African lion and pythons) which are to be treated as wild life specified in Part I (i.e. as CITES Appendix I species) for the purpose of import into Zimbabwe.

b. Parts and Derivatives

As mentioned above, "wild life" is defined as any organism, whether alive or dead, and the egg or seed of any organism, referred to in the Second Schedule, and any portion whatsoever of any such organism, other than a trophy, whether such portion is processed or not.

"Trophy" is defined as meaning any durable portion of any wild life (as defined above) which has been subjected to a process of manufacture, and any manufactured thing of which the durable portion of such wild life forms a part.

The rules laid down by the Regulations with regard to imports and exports always refer to both wild life and trophies, as defined. All parts and derivatives are therefore covered.

c. Appendix III of CITES

Covered. All Appendix III species are listed in Part III of the Second Schedule.

B. Parks and Wild Life Act 1975 as amended at 1 August 1990

Parks and Wild Life (General) Regulations 1990

a. Taxonomic Groups

"Animal" is defined by the Act as "any kind of vertebrate animal and the eggs and young thereof, other than domestic animals and fish". "Fish" includes "vertebrate fish, and aquatic molluscs and crustaceans, both indigenous and non-indigenous, but does not include the bilharzia snails *(Biomphalaria pfeifferi* and *Bulinus physopsis globusus)* and the liver fluke snail (*Lymnea natalensis*).

There are currently nine mammals, one reptile and twenty-four birds or bird families designated as "specially protected" under the Sixth Schedule.

b. Parts and Derivatives

"Trophy" means "any horn, ivory, tooth, tusk, bone, claw, hoof, hide, skin, hair or other durable portion whatsoever of any animal, whether processed or not, which is recognizable as the durable portion of any animal".

c. Appendix III of CITES

Not applicable.

4. PENALTIES FOR ILLEGAL INTERNATIONAL TRADE

Control of Goods (Import and Export) (Wild Life) Regulations 1982 (No.1) (S.I. 557 of 1982)

All breaches of the Regulations involving wild life or trophies are punishable with a fine equivalent to the value of such wild life or trophy or 5,000 dollars, whichever is the greater, and/or with a term or imprisonment not exceeding five years (section 15(b)). The burden of proof rests on the accused to prove the lawfulness of his actions.

5. PENALTIES FOR POSSESSION OF ILLEGALLY TRADED SPECIMENS

A. Control of Goods (Import and Export) (Wild Life) Regulations 1982 (No.1) (S.I. 557 of 1982)

a. Possession of illegally imported specimens

None.

b. Possession of specimens obtained by illegal taking or sale on the domestic market

None.

B. Parks and Wild Life Act 1975 as amended at 1 August 1990

Parks and Wild Life (General) Regulations 1990

a. Possession of illegally imported specimens

None.

b. Possession of specimens obtained by illegal taking or sale on the domestic market

Section 115(1) provides that breaches of section 36 (hunting, possession or sale of specially protected animals) shall be punishable on a first conviction with a fine not exceeding 2,000 dollars and/or with imprisonment for up to two years, and on a second or subsequent conviction with a fine not exceeding 4,000 dollars and/or with imprisonment for up to four years.

Section 115(2) provides that breaches of section 40 (unlawful picking of specially protected plants), section 47 (sale of live animals or trophies without a permit) and section 79 (catching and sale of fish without a permit) shall be punishable on a first conviction with a fine not exceeding 1,500 dollars and/or with imprisonment for up to 18 months, and on a second or subsequent conviction with a fine not exceeding 3,000 dollars and/or with imprisonment for up to three years.

Section 115(3) provides that breaches *inter alia* of section 37A (failure to surrender possession of a State trophy within seven days), section 42(3) (sale of specially protected indigenous plants without a permit), section 45(2) (picking or sale of indigenous plants from any land), section 59(2) (sale of unlawfully hunted meat), section 74 (fishing without a permit), section 83A (possession of unlawfully caught fish with intention to sell them) or section 110(8) (breach of terms of licences or permits issued under the Act), shall be punishable on a first conviction with a fine not exceeding 1,000 dollars and/or with imprisonment for up to one year, and on a second or subsequent conviction with a fine not exceeding 2,000 dollars and/or with imprisonment for up to two years.

The most stringent penalties are reserved for breaches of section 61 (sale and manufacture of articles from trophies made from unlawfully hunted animals) and section 62 (purchase of live animals and trophies from an unauthorised seller etc.). Section 115(4) makes a first conviction punishable with a fine not exceeding 4,000 dollars and/or with imprisonment for up to four years, and a second or subsequent conviction with a fine not exceeding 8,000 dollars and/or with imprisonment for up to eight years.

However, where the offence involves the unlawful killing or hunting of a rhinoceros or any other specially protected animal specified by the Minister in the Gazette, or the unlawful possession of, or trading in, ivory or any trophy of a rhinoceros or of any other specially protected animal similarly specified, section 115(4a) imposes a mandatory sentence of imprisonment of between five and fifteen years for a first conviction, which is increased to between seven to fifteen years for a second or subsequent conviction. Where the offender satisfies the court that special circumstances justify the imposition of a lesser penalty, he shall be liable to a fine not exceeding 15,000 dollars and/or to imprisonment for up to ten years. These penalties are also incorporated into regulation 111(b)

All other offences involving ivory or rhinoceros horn are punishable with a fine not exceeding three times the value of the ivory or rhinoceros horn or five thousand dollars, whichever is the greater, and/or imprisonment for a period of two years (regulation 111(c) and section 116(3) of the Act).

In addition to the above penalties, section 91 provides that where a person is convicted of unlawfully hunting an animal, picking a plant or catching a fish and the specimen has been appropriated, killed or disposed of in any way, the court may order the payment of an amount specified by the Minister in the Gazette in respect of the animal, plant or fish in question.

6. PROVISIONS FOR THE CONFISCATION OF SPECIMENS

A. Control of Goods (Import and Export) (Wild Life) Regulations 1982 (No.1) (S.I. 557 of 1982)

No provision for confiscation is laid down in the Regulations. It is possible, however, that provisions for confiscation are contained in the primary legislation, the Control of Goods Act, which was not available when this report was compiled.

B. Parks and Wild Life Act 1975 as amended at 1 August 1990

Parks and Wild Life (General) Regulations 1990

Section 93(3) of the Act provides that the court may, in respect of any offence under the Act, order the forfeiture of any animal, other than a specially protected animal, or the meat or trophy of any such animal or any fish to the appropriate authority for the land or water in question. Anything thus forfeited to the State is deemed to be a State trophy.

Trophies of specially protected animals killed or found dead are deemed to be State trophies, except where the animal was killed pursuant to a permit or was lawfully in captivity immediately before its death. Such State trophies must be surrendered to the appropriate authority within a period of seven days (section 37A). State trophies, by their very nature, cannot be confiscated, but may of course be recovered by enforcement personnel.

Section 114 provides that all proceeds from the sale of State trophies shall be paid into the Consolidated Revenue Fund.

Regulation 79 provides that where any person is convicted of an offence in respect of ivory or horn, the latter shall become a State trophy unless some other person is entitled to possess it. Regulation 195 authorises the Director to dispose of any State trophy in terms of an authority issued pursuant to section 20 of the Audit and Exchequer Act [Chapter 168].

7. ADDITIONAL REMARKS

None.

8. SUMMARY OF LEGISLATION ANALYSIS

The Import and Export Regulations are a comprehensive instrument for CITES implementation, with regard to the import and export of CITES species. All CITES species are covered, including plants, and the conditions laid down by CITES for the issue of permits

and certificates are reproduced by the Regulations. By way of exception, there is no requirement that an import permit should be granted before an export permit for Appendix I species is issued. There is also no provision in the Regulations for the confiscation of specimens traded in breach of the Regulations, although this may be provided for in the Control of Goods Act under which these Regulations are made. In addition, no import permit may be issued without a valid export permit from the country of export.

The major gap is that the possession of and domestic trade in unlawfully imported CITES specimens is not covered, and is therefore not penalised under the Regulations. It is not known whether the Control of Goods Act regulates such possession and trade, or provides any related penalties.

The Import and Export Regulations also establish international trade controls in respect of a large number of non-CITES species, including: all wild vertebrates and invertebrates, other than fish and crustaceans, whether alive or dead; live fish and crustaceans; and all specially protected indigenous plants, as listed under the Parks and Wild Life Act that have not been artificially propagated.

The Parks and Wild Life Act establishes possession and trade prohibitions regarding specially protected animal species, as well as trade prohibitions in respect of specially protected indigenous plant species. All these species listed are indigenous, although nothing in the Act prevents the listing of non-indigenous animal species as specially protected species. This would make such species subject to the possession and trade prohibitions laid down in section 36 of the Act. This could of course only apply to animal species as defined by the Act, namely all vertebrates except for fish. It could not apply to plants, as only indigenous plant species are dealt with by the Act.

However, other provisions in the Act prohibit, except under a permit, the sale (but not the possession) of any live animal or the trophy of any animal (section 47(3)). Once again, this provision is only applicable to vertebrates except fish. As the Act does not specify that it is limited to indigenous species, it follows that it is applicable to any species as defined, whether indigenous or not, and therefore to all the CITES species that meet the definition.

The combination of the two pieces of legislation therefore allows for an effective implementation of CITES.

Annex 3

Taking into account the amendment to the terms of reference of the Panel of Experts on the African elephant, adopted by the Standing Committee at its 36th meeting, the Government of Japan would like to submit the following information regarding the general implementation of CITES controls .

I . Import

1. Permit requirement

1.1 Japan complies with the permit and the certification requirements as laid down in Articles III to V and VII of the Convention.

1.2 In addition, Japan requires the presentation of a CITES export permit and , in the case of Appendix I specimens, the issuance of a CITES import permit for specimens except in the case of household effects imported under the exemption of Article VII.

2. Border Controls

2.1 All CITES specimens are subject to controls to ensure their compliance with the provisions of the Convention.

2.2 CITES border controls are the responsibility of the Customs Authority with technical direction from the CITES Management Authority.

2.3 CITES specimens may be imported through designated ports of entry only.

2.4 CITES controls consist of

a) systematic verification of the documentation , using the prior confirmation made by CITES Management Authority when appropriate ; and

b) physical inspection of all shipments.

2.5 CITES documents are collected by the Customs Authority and periodically transmitted to the CITES Management Authority

II . Domestic controls

1. General

1.1 As from 1987, domestic controls on a range of Appendix I specimens and specimens of Appendix I species bred in captivity for commercial purposes are carried out by the Environment Agency under the Law for the Conservation of Endangered Species.

1.2 The domestic controls for specimens of an Appendix I species would remain in place even if certain populations of the species concerned would be transferred to Appendix II .

2. Ivory Controls

Stocks of whole tusks and cut pieces of ivory, and all transactions of this ivory are legally controlled and monitored by the competent Government Authorities from the moment of importation until final carving. Thereafter, carved ivory is subject to a monitoring and labelling scheme administered under Government supervision by the Japan Federation of Ivory Arts and Crafts Association.
From the point of carving to the point of sale this is achieved as follows:

2.1 With the exception of personal possession, all whole tusks, whether raw, carved or polished, must be legally registered by the Environment Agency, and may only be bought and sold if they are accompanied by a fully completed registration card. Changes of ownership must be notified to the Environment Agency within 30 days.
Violations of these regulations can lead to imprisonment for a period of 6 months, or to a fine of 500,000 yen.

2.2 Anyone engaged in trade in cut pieces of ivory must legally register with the Environment Agency and the Management Authority(MITI), and must keep records of all transactions.
These records must be kept for 5 years and may be inspected at any time by government officials.
Violations of those regulations may lead to imprisonment for a period of 6 months, or to a fine of 500,000 yen.

2.3 Those registered to engage in trade in cut ivory are entitled to participate in a government controlled scheme whereby blocks of raw ivory are sold only when accompanied by a "management card", through which in subsequent history can be traced. The Japan Federation of Ivory Arts and Crafts Association has committed all its members to participate in this scheme.
Any abuse of this scheme can lead to imprisonment for a period of 6 months, or a fine of 500,000 yen.

2.4 Carvings proven to be produced under the scheme described above are entitled, under the control of the Ministry of International Trade and Industry and the Environment Agency, to be accompanied by a uniquely numbered seal certifying their legality.
Abuses of this system can lead to a fine of 200,000 yen.

Oct. 1996
The Environment Agency
The Ministry of International Trade and Industry
Japanese Government

Domestic trade control system in Japan

The latest amendment of the Law for the Conservation of Endangered Species of Wild Fauna and Flora entered into force on June 28, 1995, and provides for the following four steps to be taken:

(1) Registration of whole tusks,

(2) Notification by those engaged in business dealing with pieces of tusks,

(3) Obligation imposed upon the producers having made the notification to compile records of their transactions, and

(4) Certification of ivory products.

1. Registration of whole tusks,

Raw tusks, carved tusks and polished tusks (only limited to those maintaining their whole shapes), may be bought or sold only if they are accompanied by a registration card issued by the Director-General of the Environment Agency.

The method by which the registration is made is as follows:

(1) Tusks to be Registered

The raw tusks proven to have been acquired or imported prior to the inclusion of the African elephant in Appendix I of the Convention on International Trade in Endangered Species of Wild Fauna and Flora (CITES).

(2)Management of Registered Tusks

<1> Anyone having been given a registration card is required to be ready to present it at any time when he/she (or a corporation) displays the tusk relating to the registration card for the purpose of trading in it either commercially or non-commercially.

<2> When a registered tusk, is delivered or transferred it must be accompanied by the registration card.

<3> Anyone having received a registered tusk is required to notify the Environment Agency within 30 days of receiving it.

<4> Where anyone ceased to own a registered tusk either by losing it (including theft) or cutting it up into pieces, he is required to return the registration card, within 30 days of the day the event took place.

<5> Those having violated (2)<1>~<4> may be fined an amount not exceeding 200,000 yen.

<6> Those having made the registrations by falsification or other illegal means are liable to imprisonment for a period not exceeding 6 months or to a fine not exceeding 500,000 yen.

<7> Any registered tusk without CITES standard mark may be marked with the ISO code for Japan, the registration number, the year of registration and the weight.(e.g. JP 1234-95-11)

(3)Designated registration organization

<1> The business of registering is conducted by public organization designated by the Director-General of the Environment Agency.

(Designated registering organization:Japan Wildlife Research Center(JWRC))

<2> All data of the registered tusks are collected in the computerized database at JWRC.

2. Notification by those engaged in business dealing with cut-pieces

Anyone who is to carry out any transaction involving the transfer or delivery of pieces of tusks of elephants is required to notify the Director-General of the Environment Agency and the Minister of International Trade and Industry of the matters mentioned below. The matters to be notified are:

<1> his/her own address and name.

<2> the name and location of the facilities to carry out the business; and

<3> the quantity in stock. (the number of the cut pieces and the total weight of the stock.)

Anyone having carried out any transaction involving cut pieces of tusks of elephants without the notification may be fined an amount not exceeding 500,000 yen.

The officials of the Environment Agency and the Ministry of the International Trade and Industry have randomly inspected the ivory traders. The inspections have been done without the prior notice.

3. Obligation upon persons having made notification to compile a ledger of transactions,

Anyone who carries out any transaction involving cut pieces of tusks of elephants is required to compile and maintain a ledger recording all such transactions; and is required to preserve the ledger for five years, and to present it at the request of officials of the Environment Agency and the Ministry of International Trade and Industry.

(1) The obligations

<1> The person responsible must enter in the ledger the name and address of the person (or corporation) from whom the transfer was carried out (this must be confirmed) as well as the date of the transaction, weight and quantity in stock.

<2> Each record in the ledger must be kept for five years, and the person responsible is required to present the ledger at the time of surprise inspection by officials of the Environment Agency and the Ministry of International Trade and Industry.

<3> Where anyone has failed to make the entry in the ledger or has made a falsified entry, the Environment Agency and the Ministry of International Trade and Industry should issue necessary instructions, if necessary,; and, where anyone has violated the instructions, he/she may be ordered to suspend business for a period not exceeding 3 months. Those having violated the orders may be imprisoned for a period not exceeding 6 months or fined an amount not exceeding 500,000 yen.

<4> Where the Environment Agency and the Ministry of International Trade and Industry seek to undertake an inspection of a business, the owner of the business is required to accept such an inspection. Anyone having refused such an inspection may be fined an amount not exceeding 200,000 yen.

(2) Preparation of Management Card

<1> Anyone having made a notification may prepare and maintain a management card in which the date of acquisition and other information are recorded.

<2> The cases where one may make up the management card are:

a) Where cut pieces of raw tusks, etc. are transferred or received together with the registration card.

b) Where materials accompanied by a registration card are transferred or delivered and where those materials are cut up to be transferred or delivered further.

c) Where the transfer etc. of cut pieces of tusks, etc. which were legally imported by the person making the transfer are to be carried out.
d) Where the transfer etc. of cut pieces which were legally imported by the person making the transfer are to be carried out.
<3> The preparation of a management card is not mandatory. However, if a management card has been prepared, the transfer of the cut piece to which it relates must be accompanied by the management card. The Japan Federation of Ivory Arts and Crafts Association has committed all its members to participate in this scheme.
<4> Where anyone has violated the rules for preparing a management card or has entered any falsified information in the management card, the Environment Agency and the Ministry of International Trade and Industry shall issue instructions, if necessary. Where anyone has violated these instructions, he/she may be ordered to suspend business for a period not exceeding 3 months.
A person having violated such an order may be imprisoned for a period not exceeding 6 months or fined an amount not exceeding 500,000 yen.

4. Certification of Ivory Carvings

Where ivory carvings are recognized as having been produced from legally obtained raw tusks, that had been registered on the basis of an application filed by a producer, the producer may obtain a seal certifying to that effect from the Director-General of the Environment Agency and the Minister of International Trade and Industry.
In order for a producer to obtain the seal, he/she is required to prove that the carving has been produced from legally imported or legally obtained ivory.

(1)Carvings that may be certified

<1> a carving produced from ivory was transferred together with the management card;

<2> a carving produced from a raw tusk was transferred together with the registration card; and/or

<3> a carving produced from a raw tusk or cut piece was legally imported by a producer.

(2)Method by Which the Seal Is To Be Attached

<1> A seal shall not be attached to any carving other than the one for which the seal was issued.

<2> Anyone having obtained a seal by illegal means may be fined an amount not exceeding 200,000 yen.

Anyone having attached a seal to any carving other than the one to which it relates may be fined an amount not exceeding \200,000.

<3> The business of certification is conducted by public organizations, JWRC, designated by the Director-General of the Environment Agency and the Minister of International Trade and Industry.

<4> All data of the cut pieces are collected in the computerized database at JWRC. JWRC always refers to the data when it issues the seal.

To whom it may concern

Tokyo, 29 July 1996

Dear Sir,

This is to inform you that Japan Federation of Ivory Arts and Crafts Association (JIA) held a meeting of the Directors of the Board on 20 June 1995. At the meeting, the Directors of the Board unanimously adopted a Resolution on Management Cards effecting that all JIA members are required to produce and attach a Management Card when selling raw ivory materials. This was informed to all members by 3 July 1995 through its Notification. While the production and attachment of a Management Card is not mandatory under the Japanese law, all cutpieces and scraps to be dealt with by JIA members accompany a Management Card.

Yours faithfully,

Tamotsu Ishibashi

Tamotsu Ishibashi
President

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

SAFARI CLUB INTERNATIONAL 501 2nd Street NE Washington, DC 20002, Plaintiff, v. SALLY M. R. JEWELL, in her official capacity as Secretary of the U.S. Department of the Interior; U.S. DEPARTMENT OF THE INTERIOR, an agency of the United States; DANIEL ASHE, in his official capacity as Director of the U.S. Fish and Wildlife Service; and U.S. FISH AND WILDLIFE SERVICE, an agency of the United States 1849 C Street, NW Washington, DC 20240, Defendants.	Civ. No. 14-cv-00670(ABJ) DECLARATION OF FREDERICK L OOSTERHUIS

I, Frederick L Oosterhuis, being first duly sworn on oath, depose and state as follows:

1. I am the Director of Hunting Legends International, Pty Ltd, a company duly registered and based in South Africa.

2. I have been a life member of Safari Club International since 2012.

3. I am also a member of the Professional Hunters' Association of South Africa, Wildlife Ranching South Africa, International Professional Hunters' Association, and the South African Hunters and Game Conservation Association.

4. Hunting Legends International is a specialist African hunting corporation. We offer world class hunts to our clients.

5. Hunting Legends International also owns one of the top ten rare-game breeding projects in South Africa. We breed lions, sable antelope, roan antelope, buffalo, black impala, nyala, Livingston eland, and rhinos.

6. Many of our clients have hunted in Zimbabwe. Since 2006, we have had clients with successful elephant hunts in Zimbabwe. Hunting in Zimbabwe offers our clients a unique experience to hunt elephant in large, wild and untamed areas that give the elephants a fair chance of avoiding the hunter and give hunters a valuable hunting experience.

7. Our clients and professional hunters have witnessed many elephants in the areas where we hunt. The elephant populations seemed to be healthy and in high numbers.

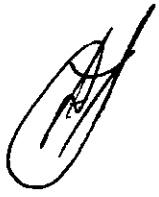
8. When our clients hunt elephant in Zimbabwe, members of the local communities are employed as trackers and guides for the hunts. The hunts provide the communities with a direct financial benefit. Hunters also often tip the community members who assist in the hunts. On successful hunts, the community members are often able to harvest the elephant meat, providing a valuable source of protein to the community.

9. I believe that the U.S. Fish and Wildlife Service's decision to ban the importation of elephant trophies from Zimbabwe and Tanzania is a big mistake. Their decision will diminish the value of elephants, causing local communities to suffer financially when they lose the benefits from U.S. sport hunters. Without this financial resource, I believe the locals will resort to poaching elephants for survival.

10. Local community members will also kill elephants that threaten their crops. The income generated from the presence of U.S. hunters balances against the loss of crops caused by elephant damage. If the number of hunters and hunter generated revenue declines or disappears, there will be no more financial benefit for local residents when they lose crops to damage caused by elephants.

11. Hunters provide much needed financial support that the parks and anti-poaching organizations in these areas rely on to protect elephants.

12. Hunters from all over the world, but mostly those from the United States, provide a huge source of revenue for the parks, private reserve owners and local communities in Zimbabwe and other areas. Without U.S. hunters in the field, much of this source of income will be lost. Many U.S. hunters that would have hunted in Zimbabwe or Tanzania will now hunt elsewhere, causing huge reductions in revenue for areas that desperately need it. Many efforts to protect elephants and combat poaching will be defunded.



13. I have seen how money from hunters positively impacts local communities. I cannot imagine how Zimbabwe and those communities will be able to cope without U.S. hunters providing a valuable source of income and support.

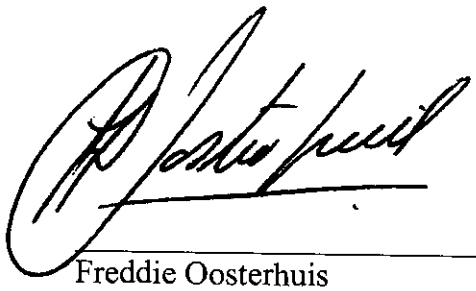
14. Hunting Legends International has two clients that have already booked elephant hunts in Zimbabwe for this year. The total money invested by the two clients already totals about US $122,000.00 and they are expected to spend more money during the hunts. We have tried to cancel the hunts and get refunds for our clients, but all the money has already been utilized to pay for accommodations, government fees, tag fees, etc. The hunts are not refundable at this point.

15. In order to maintain the company's very good reputation, we are considering refunding our clients and taking a severe financial loss to the company. We cannot afford to lose our reputation. At this point, I do not know what we will do.

16. I submit this declaration in support of Safari Club International's efforts to challenge the U.S. Fish and Wildlife Service's decision to prohibit the importation of sport-hunted elephant trophies from Zimbabwe and Tanzania in 2014.

In accordance with 28 U.S.C. §1746, I declare under penalty of perjury that the foregoing is true and correct.

Dated this 22nd day of April, 2014, at Wind Gap, Pennsylvania.



Freddie Oosterhuis

Opping Investments Pvt Ltd T/A

Charlton McCallum Safaris

in association with Global Marketing Consultants LLC

Tel: +263 4 499536 HOP 0259. Email: hunting@cmsafaris.com . Website: www.cmsafaris.com

9th April 2014

Dear Sir

Myself and my partner of CharltonMcCallum Safaris, being Myles McCallum and the community of the Dande communal land and Safari area, are writing this letter to you to highlight the terribly negative impact of your decision to suspend importation of elephant for 2014 with immediate effect it will have on, not only all the people living in the area, but also the elephant themselves that you seek to protect.

Our company was the first hunting company in Zimbabwe to go in a joint venture project with the communities living within the area itself, as we felt that the people were not getting their fair dues from hunting and that they should play an active role in the sustainable off take of wild animals living within their area. The primary animal that benefits them is elephant.

We hunt 15 elephant bulls in our Dande area. These are sold on 14 days at us$1100/day and trophy fees of us$15000 per elephant. This amounts to a total of $231,000. Then a further us$225,000 for the trophy fees making a grand total of us$456,000. . From this amount the communities earn 50% of this, being US$228,000. The communities themselves fund numerous projects from this income including clinics, schools, water wells etc which will be directly affected by your decision to suspend elephant trophies.

Our company uses the monies generated from the elephant hunting to operate a very successful anti-poaching unit, The Dande Anti-Poaching Unit- DAPU. Please look at the link below to understand how effective and costly this project is http://cmsafaris.com/african-elephant-research/dande-anti-poaching.htm

DAPU survives through funding from ourselves and the generous donations from our Elephant hunters who, when on the ground realise that without DAPU involvement we would be losing many elephant to poaching. For your information we started DAPU 4 years ago when we counted 40 elephant carcasses found from the previous off season. This last year we have found only one- a clear sign that we are having a great effect on conserving our elephant numbers.

I can honestly say that with a possible 14 elephant cancellations that we are now looking at for the 2014 season due to your decision we will not be able to continue the sterling work that DAPU has managed over the last 4 years and without a doubt we will reverse all the gains that we have seen and we will be back to finding dozens of elephant carcasses.

So in short, Sir, the ban will have a very negative impact on not only the people of the Dande but the very elephant you wish to protect. Should the ban not be reversed we will start to see wide spread elephant poaching again. It will also affect some 20 000 people that rely on monies and work generated through elephant hunt. I hope that you will reconsider your suspension.

Regards James Charlton

FINAL REPORT

Mid-Term Evaluation
of the
Zimbabwe Natural Resources Management Project, Phase II
(USAID/Zimbabwe Strategic Objective No. 1)

Contract #AEP-0085-I-00-6021-00

Communal Areas Management Programme
for Indigenous Resources, CAMPFIRE

Submitted to:
USAID/Zimbabwe

Submitted by:
The Mitchell Group, Inc.
18161 11th Street, NW
Washington, DC 20001
and
South-East Consortium for International Development
1634 Eye Street, NW, Suite 702
Washington, DC 20006

July 31, 1998

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EXECUTIVE SUMMARY

This report presents the results of a formal mid-term evaluation of USAID/Zimbabwe's bilateral Natural Resources Management Project (613-0241), Phase II (NRMP II). The project supports the Communal Areas Management Programme for Indigenous Resources, CAMPFIRE, which is a distinctively Zimbabwean initiative designed to achieve community development and conservation objectives by transferring certain ownership rights over common property resources from central state authority to local communities. The Programmeformally began with the Department of National Parks and Wildlife Management's decision to devolve use rights over a mobile resource, wildlife, to Rural Districts. Along with certain management responsibilities, decentralized governance gave local populations access to a ready stream of benefits in the form of the trophy fees associated with an established industry. A few years later, in 1989, USAID began supporting CAMPFIRE through its regional Natural Resources Management Project (NRMP I) (690-0251.13). This geographically focused pilot phase was redesigned in 1994 as the bilateral NRMP II ($16.0 m), which included some continued funding through the USAID regional office ($4.5 m). The bilaterally-managed project, effectively underway since late 1995, is national in scope and adds support for CAMPFIRE's diversification into other indigenous resources. After a recent extension, NRMP II is scheduled to continue through September 30, 2000.

The evaluation scope of work calls for a comprehensive external review of CAMPFIRE and documentation of USAID support to it. The Programme is complex, and its implementation involves a partnership of government agencies and non-governmental organizations who assist rural communities and community based organizations. The evaluation team identified a number of priority issues:

- Adequacy of the current level of devolution of authority over resources to the Rural Districts to achieve the tenure security and participation that CAMPFIRE assumes necessary for success;
- Potential for diversifying into additional resources and income streams and CAMPFIRE's capacity to undertake this initiative;
- Potential for NRMP II to enhance the long-term sustainability of CAMPFIRE;
- Adjustments in project management structures, resources, and timetable needed to achieve maximum results.

In addition, because the natural resource revenues the Programme channels to local populations are largely dependent on consumptive wildlife use, the Programmehas become the target of an aggressive anti-CAMPFIRE animal rights campaign. The evaluation seeks to clarify some of the confusion resulting from this public controversy about CAMPFIRE and the USAID assistance provided through NRMP II.

Findings and Conclusions

With its approximate 10-year history, the lessons from CAMPFIRE are of real value to similar programs in the region and elsewhere. In favorable habitats of Zimbabwe's agriculturally marginal communal lands, the Programme sports a stable track record of producing meaningful benefits for local residents. In locations where wildlife is less abundant, the economic returns have been mixed and show less promise, at least in the short term.

By conferring proprietorship of wildlife resources to the Rural District Councils (RDCs) through the mechanism of "Appropriate Authority," benefits accrue to the populations residing in proximity to favored habitat with its rich endowment of charismatic megafauna. Most revenues still derive from the consumptive, sustainable use of this resource. The maintenance of trophy quality and overall wildlife numbers suggest that wildlife populations are being sustainably exploited under present conditions. Most observers consider the hunting quotas in CAMPFIRE areas to be conservative.

CAMPFIRE's philosophy engenders a positive sense of empowerment, and its approach is well-entrenched among local populations as it is across government departments. Non-wildlife resources, including some mineral resources, are coming under the CAMPFIRE umbrella, and thus, under its designation of the RDC as the responsible administrative unit, where Appropriate Authority resides. That level is generally higher and removed from that of the producer communities. CAMPFIRE functions best where the RDCs have devolved some authority, and the majority of revenues, to the producer level. Where benefits are minimal or have been generalized to a wider population, the essential link to improved conservation breaks down.

Devolution of resource management authority below the level of the Rural District remains problematic. While policy and legislation enable some devolution and transfer of benefits to those groups actually bearing the burden of management responsibility, the RDCs have a mixed record in applying CAMPFIRE's principles. Over time and on

sustainable.

Simplify NRMP II administration by implementing a series of key project management changes. In the short term, phase out the Project Execution Team (PET) and transform its subcommittees into CAMPFIRE Consultative Group (CCG) subcommittees, in part by refocusing CDF financial management and other NRMP II management responsibilities more tightly within the Institutional Contractor (IC) and USAID SO1 team. For broader project issues, including impending NRMP II and Mission graduation, the core management team would work closely with the NRMP II Bilateral Review Committee. In the longer term, the evaluation team recommends that a CDF/follow-on funding mechanism be used to provide an *enabling context* for the development of commercially viable NRM enterprises identified through the participatory planning process, especially at the village and ward levels.

USAID should encourage CA to redefine its leadership role by focusing on policy dialogue and program advocacy, and on using its functions of program coordination to bring out the relative strengths of its implementing partners. Key policy areas that affect resource tenure security, governance, and access to markets require a concerted policy initiative spearheaded by the CA Board and Secretariat. The CA leadership should build on the PET subcommittee's efforts by working with the Government of Zimbabwe (GOZ), political and private sector partners to improve the CAMPFIRE's policy environment. The CA Board should bring in several outside members on an invited, fixed-term, basis representing, among other possibilities, natural resources institutions (both GOZ and NGO), the tourism and hotel sector, the financial sector, and, possibly, the mining sector. The CA should encourage that CDF funding (along with other funding) be used to reinforce CA/CCG partner collaboration at all levels, but especially at the field level (RDCs, wards, villages and other groups with recognized authority).

Support new CCG partners and redefine interagency relationships and operating procedures. USAID, together with the Bilateral Review Committee, should request that the CCG undergo a strategic reassessment of individual capacities and interrelationships among collaborators, leading to a new Plan of Operations similar to that realized in 1995. The aims would include providing greater synergy across sectoral expertise and more efficient geographic coverage through better use of the field presence of each implementing partner, redefining institutional objectives, reaffirming and accommodating new partners and strategies.

Develop a CAMPFIRE approach to community-based natural resource management (CBNRM). In concert with District Environmental Action Plan (DEAP) and other initiatives, define and generalize a flexible model of participatory land-use planning/CBNRM that infuses an empowering aspect into the existing provision for NRM by-laws. Develop a set of "best practices" guidelines that can be adapted to differing contexts. The CA should sanction this approach, which should include provision for the "graduation" of CAMPFIRE communities and an "exit strategy" for the CCG partners. This would encourage a feeling of common purpose, shared ownership of principles, and a logical avenue toward common CAMPFIRE marketing efforts in areas such as ecotourism.

Improve program monitoring and evaluation, including a major initiative to incorporate habitat monitoring into the overall monitoring and evaluation (M&E) system. Strengthen World Wildlife Fund (WWF) support to CAMPFIRE by funding actions in wildlife habitat monitoring. These should be linked to ongoing efforts among other partners, including the DNPWLM, Forestry Commission, Department of Natural Resources (DNR), and Agritex (which may also warrant some NRMP II funding.)

Regional links to efforts such as tourism initiatives, information, and marketing outreach, and sharing CBNRM lessons should be strengthened. Develop new initiatives to capitalize on the strategic alliance between the CA and ART. USAID/RCSA activities should continue to support CAMPFIRE after bilateral funding has terminated.

USAID/Zimbabwe should continue to support the CAMPFIRE movement, with some modification to NRMP II and additional funding through FY2002. Continue direct contract support of the IC and GOZ partners and continuing grant support at a reduced level to the CA. Maintain initial direct support to NGOs. Subsequently, phase down direct grants to CCG NGO partners, and, instead, encourage them to continue to access support through joint proposals with the CA Secretariat and membership for funding under the CDF or from other sources.

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Bibiography

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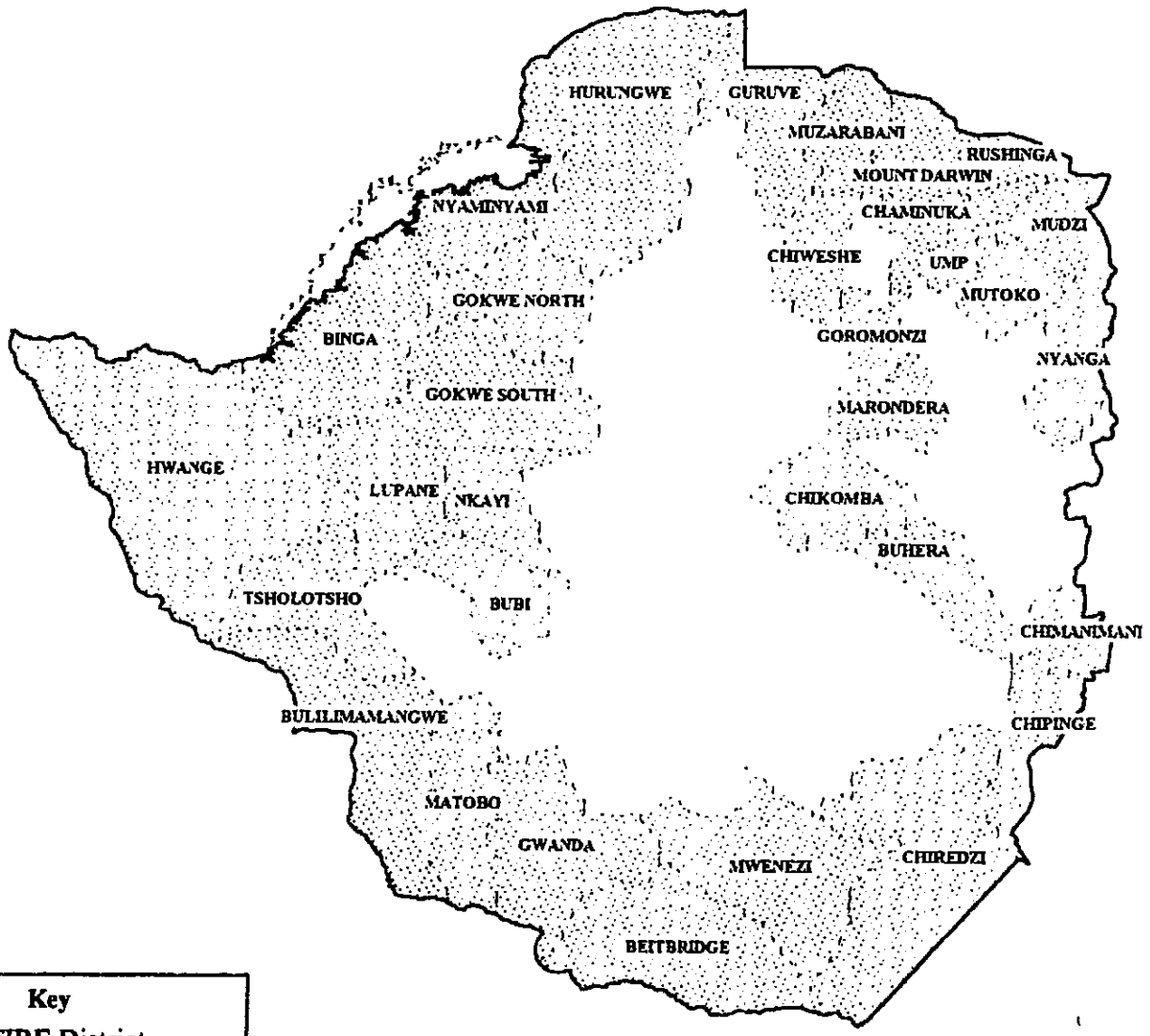
LIST OF ACRONYMS

ART	Africa Resources Trust
ADMADE	Administrative Management Design for Game Management Areas (Zambia)
BSP	Biodiversity Support Program
BRC	Bilateral Review Committee
CA	CAMPFIRE Association
CAMPFIRE	Communal Areas Management Program for Indigenous Resources
CASS	Centre for Applied Social Sciences
CBCD	Conservation-Based Community Development
CBNRM	Community-Based Natural Resource Management
CBO	Community-Based Organization
CCG	CAMPFIRE Collaborative Group
CDF	CAMPFIRE Development Fund
CITES	Convention on the International Trade in Endangered Species (Flora and Fauna)
CSP	Customer Service Plan
CCU	CAMPFIRE Coordinating Unit
CWA	Community Wildlife Areas
CLFP	Communal Lands Forests Produce
CIDA	Canadian International Development Agency
DA	Development Associates
DNPWLM	Department of National Parks and Wildlife Management
DNR	Department of Natural Resources
DEAP	District Environmental Action Plan
DSS	Decision Support System
E/NRM	Environment/Natural Resource Management
ESF	Environmental Screening Form
EIA	Environmental Impact Assessment
FAO	United Nations Food and Agriculture Organization
FC	Forestry Commission
GIS	Geographic Information System
GOZ	Government of Zimbabwe
HSUS	The Humane Society of the United States
HSI	Humane Society International
IDU	Institutional Development Unit
IC	Institutional Contractor
ISA	Initiative for Southern Africa
IUCN	World Conservation Union
IUCN/ROSA	IUCN Regional Office for Southern Africa
M&E	Monitoring and Evaluation
MAPS	Multispecies Animal Population
MLGNH	Ministry of Local Government and National Housing
MMET	Ministry of Mines, Environment and Tourism
MOF	Ministry of Finance
NGO	Non-Governmental Organization
NRM	Natural Resource Management

Zimbabwe CAMPFIRE Districts,1997



I. OVERVIEW

When, upon arriving in Ghana to open his March 1998 tour of Africa, President Bill Clinton observed that "We must learn to live in harmony with other species," he implicitly acknowledged two central truths -- the global recognition of the importance of Africa's unique and vital wildlife resources and the fact that people and wildlife, both flora and fauna, cannot thrive in isolation of one another. Africans had long coexisted fruitfully with wildlife until, first, colonization, and, then, modern development threatened and undermined traditional patterns of successful coexistence. In the mid-1980s officials in Zimbabwe's Department of National Parks and Wildlife Management (DNPWLM) teamed with social scientists from the University of Zimbabwe's Centre for Applied Social Sciences (CASS) to create what came to be called the Communal Areas Management Programme for Indigenous Resources, or CAMPFIRE. In so doing, they acknowledged the inadequacy of the prevalent model of protection, with its singular focus on creating and policing an edifice of parks and other restrictive wildlife reserves. Instead, CAMPFIRE encourages rural communities to rediscover their vital link with nature and to profit from its expression under contemporary sociopolitical and economic conditions.

This evaluation addresses the second phase of USAID support for CAMPFIRE. USAID/Zimbabwe's support through its Natural Resources Management Project, Phase I (NRMP I) was part of a larger regional project supporting several pilot efforts to test community-based natural resource management (CBNRM) approaches; the second phase (NRMP II) builds on this initial experience in four Rural Districts of rural Matabeleland and expands coverage to the national level. The bilateral NRMP II (613-0241) is managed by USAID/Zimbabwe. It began in September 1994, with a USAID contribution of US$20.5 million, of which US$16.0 million involves bilateral program funding. The remaining US$4.5 million is passed through the USAID Regional Center for Southern Africa (RCSA). Zimbabwe governmental and non-governmental organizations (NGO) partners contribute substantially in the form of salaries and organizational offices, investment of CAMPFIRE revenues, and materials. Other donors have contributed more than US$7 million to CAMPFIRE.

This report is organized to address a wide audience. This chapter essentially serves as an expanded executive summary and is intended for many readers as a stand-alone document. The main body of the evaluation goes into considerably greater detail, and the authors assume that many readers will be interested in only certain sections. Chapter II introduces the evaluation and places CAMPFIRE in a broader context. Chapter III covers the majority of current CAMPFIRE and NRMP II evaluation issues. Chapter IV explores some of the development issues raised by CAMPFIRE in greater depth and assesses the Programme response vis-a-vis these issues. Chapter V is principally concerned with USAID management decisions with respect to CAMPFIRE's sustainability and the measurement and monitoring of program performance. Scenarios for future USAID support are contained therein. Chapter VI highlights a few of the many lessons that can be drawn from the CAMPFIRE/NRMP II experience. Finally, a considerable body of supporting material has been incorporated in a series of appendices.

(1) Assess NRMP II's responsiveness to the findings and recommendations of the last project evaluation;
(2) Document USAID-funded contributions to CAMPFIRE to date;
(3) Assess the performance of each of the implementing partners in fulfilling their respective roles and responsibilities under NRMP II;
(4) Document results and impacts to date;
(5) Address certain key policy, planning, management, and implementation issues; and
(6) Recommend revised implementation approaches and arrangements for improving NRMP II achievement and impact, and the prospects for the long-term sustainability of CAMPFIRE as NRMP II progresses toward its final stages of implementation and closeout.

The evaluation findings are made against a set of project assumptions included in the original project design. These are listed in Box 1.

C. Institutional Partners

The CCG is a relatively informal grouping of directors of the CAMPFIRE implementing organizations. Considered to be somewhat "dysfunctional" from a management perspective, USAID promoted the creation of a project-specific inter-organizational structure, the PET. The PET, which is chaired by the CA, holds quarterly implementation review meetings and annual planning workshops. PET technical subcommittees, e.g., policy, monitoring and evaluation, have become de facto CCG subcommittees. One of PET's significant functions has involved review of proposals submitted to NRMP II's CDF. The CDF has a budget line of US$6 million, of which US$1.6 million had been obligated at the time of the evaluation. Over 20 CDF grants for equipment, CAMPFIRE staff, training, and operations have been released to the RDCs, funding that has enabled Zimbabwe to gear up for a much-expanded CAMPFIRE effort.

Box 1. Key Project Assumptions

1. That wildlife resources are or will become adequate to sustain commercial exploitation.

2. That wildlife utilization can compete economically and financially with other extensive forms of land use.

3. That communities deriving wealth from wildlife resources will both wish to, and be able to, protect these resources.

4. That communities will be willing to manage these resources, and can become capable of doing so, and will invest in the management of wildlife resources.

5. That the international demand for wildlife products will support widespread development of this form of land use.

6. With control over resources, farmers' behavior will lead to the improved conservation of the resource base.

7. The member organizations involved with CAMPFIRE will continue to work cooperatively towards a common objective.

8. Rural District Councils can be persuaded to pay out profits to ultimate resource managers in villages. Villages and RDCs will use these revenues and grants to promote long term resource sustainability.

9. Economically viable technologies and intervention strategies can be developed and adopted for the full range of ecosystems included in the program. (SARP 1994:9)

began assuming more of these functions. ART's efforts were instrumental in improving market opportunities by building support for the Convention on the International Trade in Endangered Species (Flora and Fauna) (CITES) partial lifting of restrictions on trade in ivory. ART had exhausted its US$1.168 million in funding as of December 1997 and receives no further NRMP II support. ACTION provides public school education and outreach materials in the form of environmental education curricula materials and a periodic publication, *ACTION Magazine*. ACTION aims to make environmental education more relevant and to tie it to local, practical examples. The evaluation team did not have the opportunity to carry out a field assessment of this component of the project, but it appeared to be accomplishing the objectives, despite reported organizational capacity constraints.

The CCG has recently admitted new governmental and non-governmental members: the **Department of Natural Resources** (DNR), **Forestry Commission** (FC), **and Southern Alliance for Indigenous Resources** (SAFIRE). Each of these organizations has submitted requests for funding under NRMP II. Their proposals support the CA's diversification initiative, which is also compatible with NRMP II's objectives. The evaluation team supports expansion of the NRMP recipients to include these new organizations in the project, an expansion that strengthens the case for an overall extension of the project completion date.

D. General Results -- Responsiveness to Previous Evaluation Recommendations

Between the 1994 Mid-term Evaluation of the Zimbabwe component of the Regional NRMP (essentially a Phase I final evaluation) and the period when NRMP II got underway in earnest, CAMPFIRE was somewhat adrift and rife with uncertainty concerning its future growth and funding. The USAID Mission, with the exception of one Personal Services Contractor (PSC), was neither focused on CAMPFIRE nor the natural resources sector in general. The project, although it had shifted to a bilateral portfolio from a management standpoint, was not well-integrated with the Mission's strategy at the time. During this period, USAID resorted to using interim "bridging" grants to maintain some continuity of NRMP activities. Subsequently, the Mission redesigned its SO1 to coincide with CAMPFIRE.

To its credit, the USAID management team convened a series of consultative workshops to analyze environmental and natural resource problem areas. The resulting analysis helped to establish a new strategic focus for the USAID program and define an operating strategy for NRMP II that substantially addressed the concerns raised in the previous mid-term evaluation report (ULG 1994). Indeed, the workshop that set the second phase into full operation responded well to many of the previous evaluation's recommendations. Likewise, Phase II design and implementation have responded to recommendations to scale up to a national-level program, expand the number and competencies of implementing partners, shift management from a regional to bilateral focus, give the project implementing committee (now the PET) real powers in coordinating, approving, and allocating work, and reinforcing the CA as the lead agency.

The evaluation also stressed the need to further devolve CAMPFIRE activities below the Rural District level and to diversify the sources of natural resource revenues, taking these steps within a

Efforts to meet these challenges have tasked the project coordination structures to the limit. The team's recommendations aim to ease these capacity constraints and enable capacity-building to be stretched over a longer timeframe.

E. Major Recommendations

USAID/Zimbabwe should continue to support the CAMPFIRE movement, with some modification to NRMP II and with additional funding through FY2002.

Continue direct contract support to the GOZ and IC partner and continuing grant support at a reduced level to the CA.

Maintain initial direct support to CCG NGOs. Subsequently, phase down direct grants to CCG NGO partners, and, instead, encourage them to continue to access support through joint proposals with the CA Secretariat and membership for funding under the CDF or other sources.

Modify the CDF to enhance CAMPFIRE sustainability and efforts to diversify the sources of revenue from sustainable natural resource use.

Facilitate review and decisions regarding current proposals under active consideration;

Open up access to CDF monies by eliminating the distinction between capacity-building and infrastructure grants;

Revise CDF proposal criteria to encourage (1) actions at the sub-Rural District level and (2) economically viable natural resource enterprises through pre-investment feasibility studies and capital investments in the resource base;

Have USAID and the MLGNH begin to involve neutral peer reviewers in decision-making about the allocation of CDF monies;

Develop a decision strategy for extending the CDF beyond the current project completion date.

Transform the CDF into a longer term financing mechanism, such as a sinking fund, that would extend NRMP II funds beyond the potential ending of USAID support in FY2000 or 2002. This would provide new, as well as ongoing, initiatives the necessary time to become technically sound and sustainable.

Use the CDF/follow-on trust or endowment funding mechanism to facilitate and provide an enabling context especially at the village and ward levels for the development of commercially viable NRM enterprises, identified through the participatory planning process.

Establish momentum behind the push for CAMPFIRE diversification into a wider range of resource use and revenue sources;

Help establish a favorable policy environment and other enabling conditions for long-term CAMPFIRE sustainability.

The evaluation team recognizes there are other possibilities for pursuing the above objectives and encourages broad CCG and BRC debate of the options presented for SO 1 program modifications for the remaining CAMPFIRE support under NRMP II. The team favors the FY2002-A scenario, as it contains the most progressive and responsive means of achieving results *and* closing down support.

1. Graduation FY2000

Scenario FY2000-A: Closeout with Modifications to the Existing Implementation Framework

Under this scenario, USAID would support existing grants under the IC through their current August 1999 termination dates, after which they would receive a one-year extension at reduced, perhaps 50-75%, funding levels. They would be encouraged to complement NRMP II grant funds with matching funds and resources to complete their CCG commitments. Support to new NRMP II partners and a renewed grant to ZimTrust would be structured similarly. Support to government partners would be drawn directly from the USAID budget as per approved activity proposals. USAID, in collaboration with the BRC, would transform/eliminate the PET. This represents a step toward Mission graduation and recognizes CA's enhanced capacity. Both the reduction in direct core support to grantees and the transformation of PET represent gradual and phased withdrawal of NRMP structures from within the CCG. The level of the NGO match could be adjusted by institution if circumstances warranted. USAID and the BRC would work through the IC to transform the CDF into an autonomous "sinking" grant fund that would gradually disperse funds through and beyond the PACD. When the monies have expired, the funding mechanism will cease to exist. The fund will support continued CAMPFIRE activities to the CA membership, CCG, and other actors whose proposals meet the revised CDF criteria. Other USAID operating units could consider supportive, complementary intervention during and after the bilateral program's phaseout. The CDF and possible presence of Peace Corps staff on the ground could leverage ongoing progress to enhance long-term sustainability.

Scenario FY2000-B: Closeout with No Major Modification to Existing Implementation Framework

Under this scenario, NRMP II would continue to fund existing CCG functions and operate under the same structures as are currently in place, ie, the PET and CDF. New members would receive funding to enable diversification, habitat monitoring, further devolution and bottom-up planning, to be given additional impetus to achieve greatest immediate results. At the PACD, USAID would pull out with minimal allowance for continuity and sustainability built into NRMP II. The RCSA and other USAID operating units might play a greatly reduced role in CAMPFIRE's future, especially if a small grant fund from other sources and/or Peace Corps staff can support field-based initiatives.

Results would suffer, however. Diversification to other CBNRM regimes that employ participatory methodologies and land-use plans, and that receive assistance from new CCG partners, would not be offered the same startup incentives, and post-project activities would be limited to options outside of NRMP II control in the post-graduation context. Triage in activity selection would result in some activities being curtailed or dropped. The RCSA, Peace Corps, and other US-funded activities could mitigate the abrupt withdrawal.

G. Summary of Findings, Conclusions, and Additional Recommendations

1. Distribution of CAMPFIRE Revenues

Findings and Conclusions

For well-endowed Rural Districts, CAMPFIRE revenue is often significant. From its inception, total US dollar revenue accruing to all Rural Districts rose from an initial $655,000 in 1989 to $1,253,405 in 1996. Since the USAID-funded NRMP II began in 1994, CAMPFIRE Rural Districts earned a total of US$ 4.8 million, slightly more than half of the US$8.5 million spent to date. Overall, the Rural Districts have over time and on average respected the first revenue distribution guideline (50/35/15), rather than the more empowering 80/20 guideline, which encourages wards to budget for and administer resource management costs. Since the Programme began, 58% of revenue has been devolved to producer wards, with the RDCs retaining an average of 25% for "management fees" and 15% as a District levy. However, these average statistics disguise significant variation across the Rural Districts. It is important to note that the management revenues are spent at the ward and village levels, so that the producer communities are receiving at least indirect benefits.

NRMP II does not directly support trophy hunting. The safari hunting industry, however, does generate substantial revenues in Zimbabwe, a portion of which the Programme captures efficiently. NRMP II supports development efforts to help local communities capture and make better use of these revenues and of the resources that generate them. Revenue distribution and use primary measures of how well the CAMPFIRE principles are being applied, and they will continue to grow in importance as new resources are developed. They are used variously for compensation for animal damage to crops, social infrastructure, group enterprises such as grinding mills, and individual households in the form of cash dividends. Since this goes to the heart of CAMPFIRE, the team spent considerable effort to assess the use of revenues.

The few well-endowed Rural Districts -- Binga, Nyaminyami, and Guruve in the Zambezi valley -- provide the bulk of CAMPFIRE revenues. This has given the Programme a false appearance of profitability and drawn undue attention to its potential as a means of providing rapid and substantial benefits to the majority of program participants. However, the longer term potential for revenue from a wide range of resources may be higher than the skeptics suspect. In addition, involvement with the CAMPFIRE provides non-financial benefits in the form of participation and empowerment.

were to be given: capacity-building and infrastructure. Capacity-building grants fund equipment, salaries, technical assistance, and training of new staff and community participants. The infrastructure grants are meant to fund capital investments. None have been made to date because most of the proposals have lacked the requisite social, economic, technical, and environmental feasibility analyses. In addition, for both development and implementation reasons, the decision was made to allocate the two types of grants sequentially, beginning first with the institutional capacity-building. As of February 1998, the CDF had made 20 grants to RDCs, obligating $Z24.2 million, or about $US1.6 million, from the CDF. The RDCs have made total cash and in-kind contributions amounting to 22% of the grants. Several infrastructure grant proposals have reached the advanced review stage.

It appears that there has been over-standardization in the formulation of grants. The similarity is the result of a belief that, to expand the CAMPFIRE concept nationwide to non-wildlife-producing Rural Districts, each new Rural District would need similar staff and organizational resources to coordinate NRM activities. That approach has led to the similarity among grants. The centralization of grant management responsibilities to the Rural District level tends to subvert the learning curve for self-organized village and ward communities. Sophisticated ward committees such as can be found in Mahenye find that under the grant they move from one "tutor" to another, rather than being allowed to develop their own skills in project development, training, facilitation, and management in a learning-by-doing framework.

The overall local revenue-generating capacity of the RDCs has not been adequately considered before approving grants that contain a salary line. The short-term expansion of salaried village and ward-level resource monitors and promoters places heavy resource demands that have implications for the long-term sustainability and credibility of the Programme. Districts that once relied on a sustainable combination of volunteer labor and a smaller number of salaried monitors paid out of CAMPFIRE revenue may find this more difficult to reestablish in the future if available resources were to shrink.

The defacto choice of the RDCs as the sole organization eligible for a CDF grant hampers project development by limiting the number of organizations able to request funds for CAMPFIRE-like activities. It reduces the incentive for village and ward communities to self-organize into cooperatives, user groups, and registered associations and eventually make themselves eligible for direct support.

In the 30 months remaining until the end of FY2000, it is unlikely that the CDF can finance more than a handful of infrastructure projects. Currently, there are not enough staff with engineering, economic, and environmental expertise in the CAMPFIRE administrative structure to analyze problems, examine alternatives, and develop worthy proposals in sufficient numbers to spend the remaining allotted funds. In addition, most infrastructure projects will take even longer to implement, thereby going well beyond the PACD. If the initial concept of funding US$3 million in CAMPFIRE infrastructure is to be retained, then a major infusion of assistance is needed from private sector business and technological consultants who can design projects that have the best possible chances for success. The chance of viable activities being undertaken would be significantly enhanced in relation to the life of the project. CAMPFIRE communities are increasingly ready to absorb the types of investments envisioned.

more to do with creating the perception that USAID treats the CCG partners consistently and equitably. Additionally, the move would streamline management in a manner consistent with the impending reductions in USAID staff associated with Mission closeout.

3. Improving Natural Resource Management

Findings and Conclusions

Through WWF and to a lesser extent other CCG members, CAMPFIRE communities are called upon to be involved in a number of resource management activities, most having to do with wildlife. Among other initiatives are wildlife fence establishment, quota-setting, and game monitoring.

Problem animal reporting and control are important issues that have the potential to promote the goals of wildlife conservation or demoralize the people who are subject to wildlife-induced life or property loss. Similarly, it can reinforce or undermine Appropriate Authority.

Most observers consider the hunting quotas in CAMPFIRE areas to be conservative. The maintenance of trophy quality and overall wildlife numbers suggest that wildlife populations are being sustainably exploited under present conditions. An analysis by Dr. Ian Douglas-Hamilton of the current aerial survey techniques and data, done in the run-up to the CITES convention in 1997, concluded that the system effectively provided data for the management of Zimbabwe's elephants and that Zimbabwe possessed "one of the best sets of elephant data in the world."

Although various stakeholders gather data on biological systems and the physical environment, monitoring of habitat change is not being systematically performed throughout the country, and an organized effort has not yet been realized throughout the CAMPFIRE areas. Insufficient funds are currently devoted to this important aspect of CAMPFIRE.

Recommendations

Support increased research into non-lethal means of managing problem animals such as using recorded sounds and improved delivery systems for irritant sprays (i.e., capsicum).

Adopt a trophy record system that favors selection of older male animals, rather than prime males or females, an approach that has distinct advantages. The adoption of qualitative rather than exclusively quantitative measures would favor this change, which the GOZ and NGO conservation agencies should encourage.

Improve the management of lesser game. In the short term, improve reporting and completion of the hunting forms and surveys. Also, in keeping with adaptive management, use meetings or special working group sessions to determine field-based mechanisms for assessing populations and trends for lesser species. Focus on commercial exploitation of and the creation of value for lesser species such as the impala. Local/regional sport hunting, subsistence hunting and local

and responsibilities. It upset the relative positions of the actors within CAMPFIRE and reallocated project resources. The relationship between the CA and ZimTrust is an obvious example. The CA emerged from ZimTrust's shadow as the lead agency, with considerable project resources and a mandate to expand its capacity. This expansion touched upon areas of responsibility (e.g., training and technical assistance) formerly (and exclusively) in ZimTrust's portfolio. On the other hand, the CA has complained about ZimTrust's direct project line to USAID.

Instead of effective leadership and coordination of the CCG, the evaluation team saw several instances of intra-CCG squabbling over decision making prerogatives and access to project resources. This may reflect, in part, historical disagreements among the CCG members. The team also believes it reflects the absence of clearly delineated CCG roles and responsibilities and firm CA leadership in inspiring the needed sense of shared ownership in the CAMPFIRE implementation effort.

Implementing partners have been successful in instilling a sense of ownership among participating RDCs -- to the extent that they consider themselves **to be** CAMPFIRE. The work plans of these CCG members have been responsive to beneficiaries' demands for services -- although the demand is frequently larger than institutional capabilities can deliver.

b. Coordination of the NRMP II Support Effort

The SARP NRMP II project document states that "no project specific steering committees or other special management structures will be established to guide project implementation, allowing project management to focus on strengthening CAMPFIRE institutions and structures for maximum relevance and sustainability of program interventions and accomplishments" (SARP,1994:33). There is no mention within the project document of an entity similar to the PET. The PET has, however, become just such a "steering committee." The reason is that, at the time the PET was set up, the CCG was not providing much overall guidance or direction, and the PET stepped in and effectively managed to pull things together. That is, the PET took control of CAMPFIRE coordination by default, in order to move NRMP II activities forward and "get things done." The various subcommittees were formed (e.g., policy and M&E) for much the same reason.

The PET has helped strengthen the CA and has permitted the "expanded project team" to work better than ever before. It has helped CCG partners focus and begin working together on common objectives, rather than proceeding individually. In short, the PET has improved coordination. The PET has also been successful in launching NRMP II activities and has supported the CA in building up national level representation and activities. The downside is that it has essentially replaced the CCG, which it has not similarly strengthened, nor has it improved the partnerships that could have resulted. These outcomes were **not** intended.

NGO partners are generally critical of the PET. A major criticism is that USAID set up NRMP II has for its "administrative convenience," instead of in an optimal way for CAMPFIRE. The NGOs cite the PET as an example: while it may be useful for USAID, it does not promote project administration

Collaboration between the regional program and the bilateral implementation effort has improved significantly in the several years since the last mid-term evaluation. Synergy between similar CBNRM programs is developing across countries. Shared objectives and agendas are strengthening individual programs. Other programs, for example, have learned from CAMPFIRE's strengths -- its principles, its commitment to empowerment, and its strong adaptive management approach to wildlife and program coordination -- and from CAMPFIRE's weaknesses -- limited devolution and constraining policies that make change difficult and foster too great a focus on a single resource. Progress has been limited by the staff and time the RCSA has been able to afford.

Recommendations

USAID should concentrate its support of CA's Harare-based activities in two specific areas -- program advocacy and policy dialogue. *Program advocacy* includes national and international initiatives aimed at informing individuals and groups about the CAMPFIRE movement and promoting a positive, constructive image. The CA has carried out this activity well in the past. Effective advocacy will require using the most current and appropriate communication technologies (e.g., Internet, multi-media presentations). *Policy dialogue* requires proactively engaging policy makers in discussions of important policy issues of direct relevance to CAMPFIRE, with the intent of promoting the passage of sound legislation. It will also include dialogue on regulatory matters pertaining to the implementation of laws. The CA will have to strengthen its policy advocacy skills and draw upon CCG resources, such as CASS and ART, to complement and help build this capacity.

Since USAID is going to graduate Zimbabwe within the next five years (and perhaps end funding to NRMP II even sooner), it needs to begin *now* to relax its control of the project and avoid micro-management. It will need to relocate de facto project control and authority to Zimbabweans, who eventually will have to assume complete program responsibility.

The CA should request RCSA assistance in accessing the lessons of devolution and working with CBOs and local level producer communities. This could involve workshops, exchange visits for the CA Board, RDC executives, and others, including community-based organizations (CBOs).

The RCSA should take the lead in defining an appropriate USAID role in supporting southern Africa regional states and NGO concerns in advocating national and regional positions on important policy and economic issues related to wildlife and other resource management and use at international fora/venues.

5. Devolution of Authority

Findings and Conclusions

The essential "owners" of CAMPFIRE within Zimbabwe are the rural communities and their elected representatives at the RDC level. Their natural resources and socioeconomic well-being are the

6. Land Use and Diversification

Findings and Conclusions

Diversification of the sources of economic benefit from improving NRM depend on the inherent potential of both the resources and the political-ecological context. Assessment generally underlies development projects espousing a NRM objective. CAMPFIRE's capture of a ready stream of revenue renders it somewhat exceptional, and a single resource indicator -- trophy quality -- determined program organization and focus in the early years. When some four years ago the Programme began diversifying, institutional momentum and the undeniable importance of wildlife have kept other resources in the background.

In this section, the evaluation team assesses the progress and apparent potential of broadening the economic base upon which the CAMPFIRE principles are being tested. In this respect, several issues may prove key to the future character and composition of the CAMPFIRE movement:

Actual land-use potential, the institutional capacity to make such a determination, and the means of devising an appropriate land use strategy based on the assessment.

Diversification of the benefit streams: the economic potential of sustainable exploitation of the resource and the prospects for channeling revenues in a manner consistent with the movement's philosophy.

The depth and breadth of CAMPFIRE management to accommodate new resources, markets, and modalities of production and distribution.

The feasibility of using NRMP II funds to bring in new institutional partners to meet this expanding mandate.

The issues are vital and underlie the rationale in recommending continued funding for NRMP II under the scenarios developed elsewhere in the document. The evaluation has already signaled that under CAMPFIRE, WWF has made significant steps toward participatory land-use planning (cf Section II.B).

Recommendations

Add new partners to respond to new technical and policy needs associated with diversifying and expanding coverage.

Strengthen participatory land use planning activities and develop guidelines for bringing non-wildlife and ecotourism models to the point where they can be adapted and replicated.

networking and facilitation of cross-country visits and other strategic encounters would also play to ART's strengths.

Work with CCG members, especially the CA, to use the Internet to link CAMPFIRE globally with affiliated interests in such subject areas as CBNRM, responsible ecotourism, and indigenous rights groups.

Assist the CA in creating and maintaining an Internet-based discussion forum where substantive and controversial issues can be debated and constructive suggestions from all quarters incorporated into the CAMPFIRE process. In this way, individuals and organizations, including animal welfare interests, could offer alternative perspectives on such questions as problem animal management, wildlife population dynamics, sustainable finance, resource tenure, wildlife habitat and monitoring, PRA, and other topics that could help guide CAMPFIRE's adaptive management model.

8. Adaptive Management

Findings and Conclusions

Scientific findings and the needs of society may, for example, signal a need to adapt resource management to new information. Adaptive management, a form of "learning by doing," means steadily adjusting management in the light of experience in order to rebuild healthy ecosystems. Assessment and monitoring are integral to adaptive management, which requires field-based data from local resource users.

Recommendations

Have CASS continue playing an active role in CAMPFIRE policy analysis and applied research. Encourage it to develop its policy dialogue skills so its analysis may better contribute to policy decision making. Specifically, CASS should: (1) write policy briefs that summarize major findings and recommendations; (2) seek to expand the form in which studies are presented so that they are accessible by sub-national audiences, e.g., they might work with *ACTION Magazine* to put some policy related studies in an animated strip format in the magazine and other educational materials; and (3) seize opportunities to make its work known through popular media, public speeches, and participation in CAMPFIRE meetings, workshops, and training.

Although the results must feed into an adaptive management framework, establish a process that allows CASS, when tasked with a study, to determine its timing and precise content internally. The CCG should help define the subject areas and scope of inquiry, such as tenure policy, ecotourism, and impact of natural resource policies.

- Planning for public scrutiny
- Legitimacy of Non-Governmental Organizations
- The need for strong partnerships
- The importance of cultural values
- The inadequacy of protected area systems to protect biodiversity
- Balancing results and flexibility in programming

II. INTRODUCTION

A. Description of Activities Evaluated

This evaluation addresses the second phase of USAID support of CAMPFIRE. USAID initiated that support in 1989 under the Southern Africa Regional Program (SARP) and has continued to support CAMPFIRE under the regional SARP Natural Resources Management Project (690-0251.13), now absorbed under the newer Initiative for Southern Africa (ISA), through the bilaterally-managed Natural Resources Management Project, Phase II (NRMP II) . NRMP II (613-0241) began in September 1994. The USAID contribution was US$20.5 million, of which $16 million represents bilateral program funding. USAID/Zimbabwe's support under NRMP I was a part of a larger regional project assisting several pilot efforts in four Districts of rural Matabeleland to test CBNRM approaches. The second phase builds on this initial experience and expands coverage to the national level. Having moved beyond the pilot phase, the project is now largely a bilateral effort and is managed as such.

The goal of Phase II, as described by its logical framework (Appendix A), is to use natural resources to develop economically sustainable communities on lands marginally suitable for agriculture. The purpose of the project is two-fold:

(1) to develop community-based programs to increase income and sustain natural resources; and
(2) to improve local capabilities to protect the resource base.

USAID and its implementation partners agreed to an implementation strategy as constituted in the CCG. The resulting NRMP II -- Zimbabwe Plan of Operations (June 1995) served as the basis for a series of contracts, grants, and sub-grants that guide the specific activities evaluated in this document.

NRMP II's design, contained in the SARP Project Amendment (USAID 1995) (and in Project Document 613-0241), embodies adaptive management principles that use annual planning updates and quarterly implementation workshops. Notably, USAID/Zimbabwe and its CCG partners refocused the results orientation of the project so as to reflect the redesigned Mission Strategic Objective, SO1. The new Results Framework (RF) situates the program squarely within the Agency's Strategic Plan (SP), specifically contributing to the objectives of "sustainable natural resource management" and "biological diversity conserved."

Because of the Mission's scheduled graduation and closeout in 2003, the new SO1, "NRM strengthened for sustainable development of CAMPFIRE communities," was not expanded beyond the scope of the current NRMP II project. While not ignoring household level measures, the current RF and indicators underscore the local (village/ward) community level focus of this innovative, conservation-based community development program.

B. Evaluation Purpose, Methodology, and Scope of Work

CAMPFIRE is an important program. It is among the first to test the notion that conferring specified proprietary rights and related economic benefits to local communities that share access to a given set of natural resources will engender responsible stewardship. With appropriate support, the program design anticipates sustainable improvements in resource management and sustained benefits from a new stream of revenue. With its 10-year history, the lessons learned from CAMPFIRE are of real value for similar programs in the region and elsewhere.

CAMPFIRE exemplifies a new paradigm of conservation-based community development, founded on the premise that, by creating value in natural resources and giving communities a direct link to that value, these resources will provide sufficient incentives for the application of sustainable use regimes. That is, when a community receives direct benefits in excess of the perceived costs of management, and its access to those benefits is secure over time, it will choose to manage its resource base sustainably. This thesis attracts controversy where the principal natural resource is wildlife and the principal use is sport hunting of elephants and other fauna.

Consistent with this thesis, in 1997 Zimbabwe successfully requested that its elephant population be moved from Appendix I of the Convention on International Trade in Endangered Species (Flora and Fauna) (CITES) to Appendix II to permit limited sport hunting of elephants and ivory trade with Japan. CAMPFIRE in turn became a focus of animal rights activists that led to a direct Congressional vote on continued USAID support and to a request by USAID for this evaluation of the program. It is important to note at the outset of this report, as the evaluation team stresses, that neither CAMPFIRE nor NRMP II are ideal models, nor should they be expected to be.

This evaluation is called for based on USAID's own criteria. Following reengineering, USAID Strategic Objective (SO) teams are responsible for achieving results and using formal evaluations in a discretionary manner to help achieve them. Operating Units, including the USAID Mission in Zimbabwe, support SO team evaluations when, among other situations:

- performance monitoring indicates an unexpected (positive or negative) result on a critical measure;
- a key management decision must be made about directions in an activity, intermediate result, or SO, but there is inadequate information for making the decision;
- annual (or periodic) reviews in the operating unit or with the host country identify key questions to be resolved on which consensus must be developed;
- formal or informal feedback from participants, partners, customers, or other informed observers suggests that implementation is not going well or not meeting the needs of intended customers;
- there is a breakdown in a critical assumption or intermediate result supported by another donor

information base by using multiple data sources -- both primary and secondary, and qualitative and quantitative -- to corroborate its findings. The team obtained most primary data through interviews, focus group discussions, and direct observation. This work was carried out concurrently with an intensive review of substantive and process-related documents. In the case of the CA, where existing multiple reviews were available, meta-analysis complemented the fieldwork to reach synthesis and conclusions.

Following an internal consensus-building workshop and completion of a mid-course progress report, the team entered Phase 3, entailing analysis and report preparation. Here subject matter specialists went beyond the shared information base to address specific evaluation questions more deeply. The consensus-building effort continued as more detailed information was assembled. The intent was to insure that the write-up represented a genuine team perspective and did not consist of a series of specialists' reports. The Team Leader assembled, blended, and reconciled the individual contributions of team members to produce a unified draft report. Phase 4, ownership and completion of the final report, began with a USAID and CCG stakeholder review, followed by consultations between the Team Leader accompanied by one other team member and the stakeholders with respect to core conclusions and recommendations.

C. The Evaluation Team

The evaluation team consisted of six US-based professionals from a diverse range of professional disciplines and with extensive development experience and a local logistical support person. No team member had any direct prior experience with the CAMPFIRE Programme. As such, the team was able to conduct a truly objective examination of the project and its performance and impact to date. The team members and their roles are as follows:

- **Dr. Frederick W. Sowers**, Team Leader and environmental geographer, focused on general USAID issues, CAMPFIRE's regional dimension, lobbying, ART, and overall evaluation coordination and reporting.

- **Dr. Thomas J. Cook**, Research Triangle Institute's (RTI) Principal Scientist in Social Science and International Development, addressed devolution, socio-political issues of CAMPFIRE, and the CA, and USAID strategic planning.

- **Dr. Robert Davis,** an economist specializing in natural resource management, was responsible for wildlife and land management issues and the economics of wildlife management and alternative NRM options.

- **Dr. Lynn Ellsworth,** who specializes in institutional and economic analysis of non-profit and public organizations, addressed CAMPFIRE sustainability issues and the CDF, CA, and IC and their interrelationships.

Table 2: CAMPFIRE Programme Allocation of Revenue, 1989-1996 (ZW$)

Year		Disbursed to Communities (1)	Wildlife Management (2)	Council Levy (3)	Other (4)	Total (5)	%Annual Change
1989		$396,005	$173,180	$60,386	$25,579	$655,150	
1990		$509,994	$300,310	$129,854	$55,623	$995,781	52%
1991		$1,203,673	$823,441	$451,786	$213,544	$2,692,444	170%
1992		$3,074,278	$1,059,673	$589,914	$91,185	$4,815,050	79%
1993		$5,560,958	$2,331,210	$1,639,316	$210,050	$9,741,534	102%
1994		$7,794,511	$2,583,326	$1,219,653	$349,137	$11,946,627	23%
1995		$8,259,680	$3,086,311	$1,684,426	$228,688	$13,259,105	11%
1996		$8,388,566	$4,085,950	$3,031,985	$78,504	$15,585,005	18%
total		**$35,187,665**	**$14,443,401**	**$8,807,320**	**$1,252,310**	**$59,690,696**	

Table 3: CAMPFIRE Programme Allocation of Revenue, 1989-1996 (US$)

Year	Exchange Rate (6)	Disbursed to Communities (1)	Wildlife Management (2)	Council Levy (3)	Other (4)	Total (5)	%Annual Change
1989	*2.126*	$186,268	$81,458	$28,404	$12,032	$308,161	
1990	*2.472*	$206,308	$121,485	$52,530	$22,501	$402,824	31%
1991	*3.751*	$320,894	$219,526	$120,444	$56,930	$717,794	78%
1992	*5.112*	$601,385	$207,291	$115,398	$17,837	$941,911	31%
1993	*6.529*	$851,732	$357,055	$251,082	$32,172	$1,492,041	58%
1994	*8.2122*	$949,138	$314,572	$148,517	$42,514	$1,454,741	-2%
1995	*8.724*	$946,777	$353,772	$193,080	$26,214	$1,519,842	4%
1996	*10.07*	$833,025	$405,755	$301,091	$7,796	$1,547,667	2%
total		**$4,895,527**	**$2,060,913**	**$1,210,545**	**$217,996**	**$8,384,981**	

Table 4: CAMPFIRE Programme: Percentage Allocation of Revenue By Year (1989-1996)

Year		Disbursed to Communities (1)	Wildlife Management (2)	Council Levy (3)	Other (4)	Total (5)
1989		60.44%	26.43%	9.22%	3.90%	100%
1990		51.22%	30.16%	13.04%	5.59%	100%
1991		44.71%	30.58%	16.78%	7.93%	100%
1992		63.85%	22.01%	12.25%	1.89%	100%
1993		57.09%	23.93%	16.83%	2.16%	100%
1994		65.24%	21.62%	10.21%	2.92%	100%
1995		62.29%	23.28%	12.70%	1.72%	100%
1996		53.82%	26.22%	19.45%	0.50%	100%
total		**58.95%**	**24.20%**	**14.75%**	**2.10%**	**100%**

1. Disbursed to communities - revenue allocated to sub-district CAMPFIRE institutions.
2. Wildlife management - revenue allocated for wildlife and program management.
3. Council Levy - revenue allocated to district council general account.
4. Other - revenue invested in capital development projects and RDC levy to CAMPFIRE Association.
5. Not Allocated - revenue not allocated but retained by RDC for general account.
6. Mean annual exchange rate based on RBZ end of month exchange rate.

The second phase got underway slowly. The reason in part was difficulty in putting the IC mechanism in place. As can be seen from Table 2, some partners started spending as late as July 1996, or more than 18 months into the project. The first CDF grant was not made until November 1996, 26 months into the project. As of February 1998, somewhat more than 40% of the total budget had been expended. The purposes of each contract or grant by recipient are as follows:

CAMPFIRE Association. The CA was established in 1991 and registered with the Ministry of Public Service, Labor and Social Welfare as a NGO. In 1992 it was accorded lead agency status at the Hunyani Hills workshop. Its purpose is to represent the interests of the RDCs and to promote and serve in the CAMPFIRE program. By 1997, 36 of the 57 Councils had become Association members. RDCs without Appropriate Authority status have associate membership in the CA, and it can extent honorary and ex-officio membership to any person or group invited to join by the General Assembly at the Annual General Meeting. As the lead CCG agency for coordination of CAMPFIRE activities nationwide, the CA is expected to: provide services to members and communities; lobby on behalf of member and program interests; disseminate program information; facilitate outside training for members; coordinate the activities of CCG members; assist in developing marketing strategies for program-generated products; and secure funds for program-related infrastructure development. The CA has primary responsibility for mobilizing RDCs and CCG partners and resources to develop viable project proposals for funding under the CDF. The CA had spent less than 50% of its total allocation by the end of February 1998.

CAMPFIRE Development Fund. The CDF is a funding mechanism for two types of grants: "institutional" Community Capacity Building Grants and "infrastructural" Community Natural Resources Grants. In addition to funding specific community-based NRM activities, the CDF is supposed to strengthen the leadership capacity of the CA, strengthen the capacities of the RDCs to define and implement CAMPFIRE activities, and improve coordination of CCG members implementing CDF-funded activities. The CDF had utilized about 10% of its total allocation by the end of February 1998.

Institutional Contract for CAMPFIRE Support. The IC serves as the financial and grants management unit for NRMP II and helps the CA and the CCG benefit from the programmatic funds made available through NRMP II. Although originally conceived as a secretariat to the CA and CCG (through the PET), responsible for assisting in the day-to-day management of CAMPFIRE activities, the final agreement (CCG 1995) defined the IC's objectives more precisely:

- execute, manage, and administer grants to the CA and its RDC members, *as well as those members of the CCG which require such assistance;* and

- build, through specific in-service training programs relating to the management of USAID funds, the general management and administrative capacities of the CA *and its RDC members*, as well as those CCG members which require such assistance."

Centre for Applied Social Sciences. CASS's role is to: study program policies and activities; conduct post-graduate training in the social and political aspects of NRM; monitor the social and economic impacts of the program; promote discussion and debate of program policies and principles; and disseminate information. CASS had spent less than 35% of its total allocation by the end of February 1998.

New Partners. New partners in the CCG include MMET's Forestry Commission and Department of Natural Resources, as well as a local NGO, Southern Alliance for Indigenous Resources (SAFIRE). None of them had received NRMP II funds as of March 1998, but each has prepared funding proposals that are receiving favorable USAID review.

US Agency for International Development (USAID). The Agency, through its SO team, provides day-to-day management and oversight of all activities sponsored by the project, including the IC and CDF. It also ensures effective achievement of stated SO1 objectives. Additionally, USAID manages all strategic studies, audits, and evaluations financed by the project, as well as those program activities that link with the greater ISA-regional NRMP effort.

2. Other Donor Support

The Netherlands. The other significant external donor to CAMPFIRE is the Netherlands Government Directorate General of International Cooperation. The Netherlands Government supports CAMPFIRE through two mechanisms:

- Institutional Support to the CAMPFIRE Association (to May 31, 1998); and
- Strategic Support through ZimTrust to CAMPFIRE (to January 31, 1999).

The Netherlands program focuses on field activities in the South East Lowveld and Mid-Zambezi region. Support for the CA is targeted at: (1) restructuring the association to facilitate broader representation; (2) revision of the constitution to permit membership by producer communities (the Dutch do not consider RDCs to be producer communities); (3) support for the establishment of sub-regional sections; (4) revision of the relationship of the CA to the CCG; (5) facilitation of a clearer job description for the executive director; (6) staff increases and training; and (7) facilitation of the preparation of a proposal for improved organizational/institutional relationships.

The support to the ZimTrust furthers: (1) assessment, planning, and implementation of village-level natural resource management and poverty alleviation activities; (2) a strengthening of the RDCs ability to carry out their Appropriate Authority responsibilities; (3) promotion of NGO and GOZ agency involvement in CAMPFIRE; and (4) promotion of international communication and exchange concerning CBNRM.

A Dutch program evaluation was carried out concurrently with the NRMP II evaluation. The evaluation concluded that the partnership between CA and the NGOs in the CCG was well-founded

General Elections, the manifesto of the ZANU-PF ruling party stated that CAMPFIRE had been a party innovation." (Murphree, 1997:14) Such political credibility underscores the growing importance and attractiveness of CAMPFIRE as a popular social phenomenon. Typically, CAMPFIRE figures in two or three local newspaper articles each week. CAMPFIRE concepts continue to evolve in accordance with the socio-political realities of Zimbabwe. Although CAMPFIRE's roots and greatest achievements are found within consumptive and sustainable management of wildlife resources, that is only one manifestation of a more general movement toward community-based natural resource management (CBNRM) and empowerment through more localized control of all indigenous resources.

Discussion of the CAMPFIRE movement must begin with a commonly agreed upon set of hypotheses and principles, as outlined in the following text box.

Box 2. CAMPFIRE PRINCIPLES

As long as wildlife remains the exclusive property of the State, no one will invest in it as a resource, and therefore its long-term sustainability is in doubt. This is particularly true of wildlife found within common or open access areas – like communal areas.

The concept of the 'opens commons' must be replaced by effective control/custody of a geographically defined resource territory by the resident communities whose own well-being is most dependent on the long term sustainability of this resource. The unit of proprietorship should be as close as possible to the unit of production, management, and benefit.

Secure tenure and decentralized management over natural resources through economic empowerment of local communities or producer communities to control of benefits and management are essential. The unit of proprietorship should be as small as practicable, within ecological and socio-political constraints.

Creation of economic incentives are essential to make wildlife a competitive form of land use where this makes ecological and economic sense. Economic benefits derived directly from the management control over (renewable) natural resources and commercialization by those most closely associated with this resource will lead to sustainable use and conservation. Benefits must be sufficiently large to elicit the requisite sustainable management response.

It is when local communities themselves experience the tangible economic benefits of local natural resources that they most appreciate their value to their own livelihoods, and who will accordingly make the efforts, sacrifices, initiatives needed to protect (manage) these for their own long term benefits.

Compiled from various CAMPFIRE background documents

allowing Rural Districts, composed of elected representatives of the constituent ward and village councils that comprise each District, to get Appropriate Authority ownership and control over the management of their wildlife. The Government chose to retain the policy of vesting land rights in "communal lands," fearing that "individualization of common land holdings, extended to common pool resources, would result in fragmentation of management to levels where any possible benefits would be negated." Thus, initially CAMPFIRE was based on the concept that communal property constituted at the Rural Districts level was the appropriate entity for initiating a new approach to *wildlife* management.

At first, the RDCs were not supportive. They told the National Parks that "if [they] really want to help us, shoot the wildlife and we can get on with our farming." Given this assessment, and after observing the failure of a parastatal to launch the process that would lead to Appropriate Authority for RDCs, in 1987 the DNPWLM decided to take the lead in promoting its new program, CAMPFIRE. Prior to 1987, there was no CCG or CAMPFIRE, much less a "CAMPFIRE movement." The DNPWLM's earliest perspectives for CAMPFIRE were that "resident communities (Natural Resource Cooperatives), through group cooperative ownership, would have territorial rights over defined tracts of land called Communal Resource Areas within the Communal lands." (Martin, 1984:164) In that year the DNPWLM asked three existing organizations, CASS, ZimTrust, and WWF if they would be willing to work cooperatively to push the Programme forward. They agreed, thus beginning the first CAMPFIRE partnerships.

b. CAMPFIRE Operations

As a program, CAMPFIRE operates through committee structures at the village, ward, and district levels. In 1988, amendments to the District Council and Rural District Council Acts conferred the rights to the land and their resources to the RDCs – although these "rights" vary from district to district. The RDCs, which are headed by elected political officials, are in turn made up of Ward Development Committees (WADCOs), which are made up of Village Development Committees (VIDCOs). The Ministry of Local Government, which dictated these WADCOs and VIDCOs administrative structures, "often did not follow traditionally established boundaries of territory and membership" which has meant in practical terms that the formal structures at the local level have not provided may or may not be operational or easily accepted by the communities. If delegated to them by the RDCs, potentially the WADCOs and VIDCOs could have legal rights to ownership or exploitation of land and resources. However, the RDCs, because of wildlife's mobility, increasing financial needs and the government's inability to provide social and other services (such as clinics, schools, and road maintenance), have generally attempted to acquire and retain control many of the financial gains from district-level NRM activities. In addition, politically chosen WADCO and VIDCO representatives are not fully accepted at the local level, conflicts with traditional authorities and management units are very real. There is some reconsideration of village and local level governance that follows from a recently commissioned land tenure study and policy review which could lead to changes in the way CAMPFIRE is implemented, especially at the sub-district levels.

As other Rural Districts became aware of what was happening in Nyaminyami and Guruve the number of CCG members increased dramatically, as can be seen from the following numbers:

1988 - 2 RDCs with Appropriate Authority
1989 - 9 RDCs (beginning of NRMP I)
1991 - 12 RDCs
1995 - 26 RDCs (beginning of NRMP II)
1996 - 29 RDC
1998 - 36 RDCs.

Three phenomena explain the dramatic growth in the number of participating RDCs (full and associate members of the CAMPFIRE Association):

(1) At first local communities had been suspicious of the National Parks and Rural Districts. They were mainly interested in knowing when the Programme would be withdrawn because historically, the National Parks had not acted generously toward local populations (e.g. expropriation of tribal lands to establish parks, sanctions against traditional hunting.) . This skepticism was also a major reason why people wanted the initial dividends to be in the form of cash "in their pockets." This way the RDCs could not come back a few months later and say they had "made a mistake" and wanted the money back. Soon, however, the local communities saw that they were actually **getting** significant amounts of money and that CAMPFIRE really meant the "devolution in the ownership of wildlife revenues from central government to RDCs." At that point they became eager to protect and manage the resource newly placed into their hands. In short, there was latent popular support for RDC involvement.

(2) A substantial wildlife industry **already existed** that created a demand for the CAMPFIRE "product." What was needed was to help communities participate in this revenue stream -- a radical new concept for Zimbabwe.

(3) Enabling opportunities to build a program were facilitated by the entry foreign donors and the organizations they supported. USAID provided very significant funding support through NRMP I and II, particularly for capacity-building and training (e.g., for the Rural Districts and communities to organize for managing their natural resources, including wildlife). These funds also made obtaining new or updated infrastructure, vehicles, computers, supplies a possibility. Funds have also been available for salaries of key personnel. The support provided has included advice to RDCs on "getting the best deal" when working with the commercial sector, including on topics such as designing a tender and what to include in a contract. This support linked the demand referred to above with an expanded capability to manage wildlife and other natural resources. In NRMP II, this support has been critical in enabling even districts without significant wildlife resources to join the CA and begin to operationalize the Programme in their respective districts. CAMPFIRE has always encouraged expansion of activities to natural resources other than the consumptive use of wildlife. In short, the USAID-supported NRMP I and II have been mostly responsible for enabling the widespread capacity-building and

of direct contribution to the program. Other CCG members, in contrast, consider all CBNRM as an expression of CAMPFIRE principles. The important distinction here is that the forestry people cannot disassociate CAMPFIRE as a concept from the idea of RDCs having control of the Programme and taking a major portion of the revenue gained by such activities. When the CA lobbies on behalf of mining revenues and royalties for RDCs, it does so in the name of CAMPFIRE. For some detractors, CAMPFIRE is no more than an organized effort to subsidize the sport hunting industry.

A third source of ambiguity revolves around the roles of different parties. For example, some CCG NGOs believe that when RDCs make decisions, they do not represent the CAMPFIRE communities. The RDCs (including the CA that represents them), in contrast, believe that "we are the community" and "we are villagers ourselves." One CA Board Member commented, "I am an indigenous resource," and therefore how can anyone say that "local communities" are not sufficiently represented? (Issues of devolution of authority are discussed in more detail in section IV.A.) The ambiguity extends to USAID. Some CCG members and potential outside CCG partners look at the administrative complexity and what some see as excessive hands-on involvement by the USAID SO 1 team and conclude that USAID is dominating the CAMPFIRE Programme. Because NRMP II has been providing the bulk of the financial assistance to what is called the CAMPFIRE Programme during the past few years, some may see the two as synonymous. The Programmeis, however, distinct from the support USAID gives it through NRMP II. Other factors similarly may blur the distinction. For instance, initially the NRMP II PET was designed as a program component to enable USAID to deal directly through a single mechanism with all CCG grantees to program its funding. It is now evolving into the CAMPFIRE body that evaluates and coordinates program activities with CA partner institutions. However, according to one CCG member, there is a "need for any institution that subscribes to CAMPFIRE principles to consider itself, and be considered by others, as part of the CAMPFIRE program, notwithstanding the fact that it is not a NRMP II grantee."

Frequently there is pressure to accelerate sound implementation, and NRMP II attempts substantial resource transfers to the district level in relatively short periods of time. At the field level, however, sometimes the perception is that the project agenda is to spend quickly, on occasion at the expense of quality, relevance, and sustainability. This apparent ambiguity of purpose has been accentuated by the CA's effort, on the one hand, to determine priority districts and priority activities for each district and, on the other, its political motivation to disperse CDF grant funds equitably across its RDC constituency. Wider coverage across the country's communal areas has helped to establish the CA as CAMPFIRE's lead agency. However, the resulting levels and expectations with regard to staffing, training, meeting schedules, travel, and the like may be hard for the CCG partners and local participating institutions to sustain once such major aid departs. (Such concerns are reflected in the USAID graduation scenarios discussed in Section V.)

Ambiguity exists at the interface between CAMPFIRE and other local government structures that are not directly involved with the program. Priorities and interests vary at the different levels -- national, district, ward, and village -- and all concerned parties -- the Government, RDCs, WADCOs, VIDCOs, traditional authorities, communities, and NGOs, including the CA --manage the interface

III. NRMP II PERFORMANCE AND IMPACT

This section reviews the results achieved under NRMP II. By extension, it inevitably reviews and makes judgements on CAMPFIRE overall, as only in this way can the USAID effort be seen in perspective. This substantial chapter is subdivided into two major sections. The first deals with general concerns including the CAMPFIRE's scope, the responsiveness of USAID to the previous evaluation, which called for USAID support to match the Programme's scope, and finally the allocation and programming of CAMPFIRE revenues. The second part treats specific NRMP II and CAMPFIRE implementation issues. Performance reviews of most of the implementing partners are integrated in this chapter because the workplans of each agency are so closely integrated with specific substantive areas of intervention. The analysis identifies a number of outstanding development questions, which are covered in Chapter IV.

A. General Concerns

1. USAID Responsiveness to the NRMP I Mid-Term Evaluation

Between the 1994 NRMP I Mid-Term Evaluation and the period when NRMP II got underway in earnest, the CAMPFIRE Programme was somewhat adrift and rife with uncertainty concerning its future growth and funding. In general, the USAID Mission, with the exception of one PSC, was neither focused on CAMPFIRE nor on the natural resources sector. Although from a management standpoint NRMP I had shifted to the bilateral portfolio, it was still not well integrated with the Mission's strategy at the time. During this transitional period, USAID resorted to transitional "bridging" grants to maintain some continuity of NRMP and, hence, CCG activities.

To its credit, the USAID management team convened a series of consultative workshops to examine environmental and natural resource problem areas. The resulting analysis helped to establish a new strategic focus for the USAID natural resources program in Zimbabwe and define an operating strategy for NRMP II that substantially addressed the concerns raised in the mid-term evaluation report. Indeed, the workshop that sent the second phase into full operation responded well to many of the evaluation recommendations. Likewise, the Phase II design and implementation are responsive to the recommendations: a scale-up to a national-level program; expansion in the number and competencies of implementing partners; shift in management from a regional to bilateral focus; assignment of real powers to coordinate, approve, and allocate work to the project implementing committee (now the PET); and reinforcement of the CA as lead agency.

The ULG mid-term evaluation also stressed the need to devolve CAMPFIRE activities further below the Rural District level and to diversify the sources of natural resource revenues beyond wildlife. It recommended taking these steps within a demand-driven mode of operation and including technically and environmentally viable infrastructure in response to local needs. The project structure reflects these concerns, as the review of the implementation record under NRMP II throughout this document shows.

national coverage might have been to find successful, replicable characteristics of ongoing or new interventions. These could then be developed as several CAMPFIRE "models," to be used in a search for areas with similar characteristics in which the one or another model might be replicated.

Expanding the geographic focus is not without consequences and risks. Spreading CAMPFIRE support under NRMP II, as explained in detail elsewhere in the report, produces high expectations for benefits from wildlife and other resources, dilutes the energies and capacities of the CCG actors, and puts pressure on the Programme to engage new institutional partners and develop new revenue streams. Efforts to meet these challenges have stretched the project coordination structures and sometimes seem to be burying the program's underlying rationale in a plethora of process and planning activities. The team's recommendations aim to ease these capacity constraints by extending capacity-building activities over a longer timeframe.

3. Current General Financial Situation and Trends

Although NRMP II does not directly support trophy hunting in Zimbabwe, it supports development efforts that help local communities capture and make better use of the substantial revenues the safari hunting industry generates, and the Programme itself also captures a portion of these resources. Revenue distribution and use are primary measures of how well the CAMPFIRE principles are being applied, and they will continue to grow in importance as new resources are developed. The revenue is used variously for compensation for animal damage to crops, for social infrastructure, for group enterprises such as grinding mills, and for individual households in the form of cash dividends. Since the generation and distribution of this income goes to the heart of CAMPFIRE, the team spent considerable effort to assess the use of the revenues generated by sustainable resource activities.

Evaluation Issue: Campfire Revenue and Its Distribution to Wards and Councils. *"Describe CAMPFIRE's current general financial situation and trends, including the Programme's primary sources of income. Describe CAMPFIRE's general revenue distribution system, including proportional allocations to the various participants. Discuss the appropriateness of CAMPFIRE's current revenue distribution system, with emphasis on the proportional amounts of Programme revenues accruing to revenues accruing to each participant. How are they commonly used? Discuss any alternatives for optimizing the use of these funds in the achievement of CAMPFIRE's community development objectives."*

Findings

As WWF and CA data show (see Tables 3-10), some 93% of CAMPFIRE revenue is derived from contracts the RDCs sign with safari operators. These safari operators pay the RDCs a fee to bring in clients to shoot a game animal on District lands, usually in areas bordering the National Parks. The DNPWLM determines or agrees to the quotas for the number of animals that may be hunted. According to CAMPFIRE principles, part of this revenue is distributed to residents in the ward where the animal was shot, and in principle, the residents of these "producer wards" are free to use this money in any way they choose. Most have a ward committee to manage the quota-setting and

Photo safaris can be significant in at least 13 of the wildlife-rich Rural Districts. A case in point is the nature reserve near Bumi Hills, where Sun Hotel has exclusive rights to viewing and where elephant, antelope, buffalo, and zebra come within a stone's throw of the hillside resort looking down on Lake Kariba. Other destinations in southern Africa and Zimbabwe's own National Park system pose fierce competition. However, the private game ranches and the nature preserves themselves possess their own unique charms and attractions. Others benefit from proximity to the competition.

The richest CAMPFIRE Rural Districts have an uneven track record of distributing benefits to producer communities. In 1996, Nyaminyami District Council, Zimbabwe's top earner ($443,095 in CAMPFIRE revenue in 1996) distributed only 18% of that total to producer communities in 1996. In fact, in only two of the eight years for which data are available did this District distribute more than 50% of the revenue. The track record of second-place Guruve District Council -- it earned $299,415 in 1996 (see Table 8) -- is better: it has distributed over 70% of its revenues in the past few years.

Box 3. CAMPFIRE Revenue

Efforts to extend CAMPFIRE revenue to other natural resources, although an "early" concept, has only recently resurfaced as a significant issue. However, most RDCs are still operating using the historic definition and so restrict themselves to "wildlife." Scope for widening this definition will be determined politically, as is currently being discussed in relationship to minerals, such as gold, diamonds, black granite, coal, nickel, chromite, asbestos, and emeralds. Mberengwe District only gets .0004% of the tax earned for its minerals - not to speak of anything for the wards in which these are found. (Owen and Maponga, 1996)

On average, the Rural Districts have followed the first revenue distribution rule (50/35/15), rather than the more empowering 80/20 guideline that allows wards to budget for and administer resource management costs. Since the Programme began, 58% of revenue has devolved to the producer wards, with the Councils retaining an average of 25% for management fees and 15% as a District levy. At the same time, these average statistics disguise significant variations across the Rural Districts. Again, it is important to note that management revenues are also spent at the ward and village levels, so that the actual producer communities do receive at least indirect benefits.

As Table 11 shows, *average* household benefits rose to Z$92 (US$9.20) in 1996. This increase is, however, far from the norm and really reflects the expansion of the hunting niche in the top four wildlife districts. The median benefit was only $Z45 (about $US9), an amount not much different from what it was in 1989. However, because the payment was in hard currency, it has been inflation-proof. Generally, this amount compares to an equivalent of about a 1-2 month supply of maize per household. Many participating households fall well below even these averages. Material benefits on a per household basis are lower, a pattern that fits the tendency to implement shared investment strategies. On a more positive note, the number of households, villages, and wards receiving any benefits continues to increase.

This practice of the RDCs' legally retaining more than the recommended share of the revenue would not be so serious if the benefits per household in the producer wards were already exceptionally high. Unfortunately, most of the data indicate that, while individual household benefits fluctuate greatly,

A final point is that a few RDCs have organized insurance funds to compensate farmers for the crop damage caused by wildlife. These attempts have foundered, however, primarily because of the difficulty of assessing crop damage in a timely manner and because of false or inflated claims of damage and requests for compensation by farmers. Still, these attempts to address the risk that farmers are facing in these wards are important, and continued support should be encouraged.

Conclusions

Unless communities in the Zambezi valley realize significant economic benefit from their wildlife resources, they may lose the incentive to retain habitats and manage wildlife resources in a sustainable manner -- and Zimbabwe will lose its most productive wildlife habitats for communal area residents. More information is needed to determine what people would judge as adequate to maintain their commitment and protect the habitat from human encroachment.

The well-endowed Rural Districts -- particularly Binga, Nyaminyami, and Guruve in the Zambezi valley -- that provide the bulk of CAMPFIRE revenues have given the Programme a false sense of profitability and drawn undue attention to its potential to provide rapid and substantial benefits to the majority of program participants. Great care must be exercised in tailoring the Programme to correspond to the revenue potential of a given area.

The Zambezi valley land-use study and other information about land allocation in CAMPFIRE districts indicate that they face erosion of the wildlife management gains achieved early in CAMPFIRE's history. There is a great need for problem-solving and participatory analysis of these situations to increase the quality of the wildlife resource and value of their safari operations. In lower revenue potential areas, a longer term perspective and strategy are needed. A more integrated approach to natural resource management, one that initially focuses on woodland management while gradually building up wildlife populations, should be considered. The potential and significance of all natural resources to household well-being should not be underestimated, but neither should the differences in requisite approaches that CAMPFIRE might avail itself of.

It is not evident, where communities have invested the revenue derived from wildlife activities in collective revenue-generating activities (such as small shops offering basic staples, beer halls, and grinding mills) that these activities are any more profitable than the private sector enterprises they occasionally displaced. Nor is it clear that these collective enterprises are generally well-managed and economically viable over a multi-year period. However, in most of these cases the motive is not profit, but rather the provision of an important service at a lower cost or more convenient location that benefits the poorest of the community.

TABLE 8A: NUMBER OF WARDS RECEIVING CAMPFIRE REVENUE, AVERAGE BENEFIT PER PARTICIPATING HOUSEHOLD

Year	Number of Wards	Average Ward Dividend	Households in Ward	Total Amount Devolved to Wards	Average benefit per household in Zim $	Median Benefit per Household in Zim $	Which Buys X kilos of grade d maize	Average Benefit per household in $US	Minimum HH Benefit in Zim $	Maximum Household Benefit in Zim $
1989	16	24,688	8280	395,005	48	41	n.a.	23	5.07	498
1990	31	19,655	22503	609,292	27	19	n.a.	11	1.39	651
1991	56	22,386	54542	1,298,363	24	22	n.a.	6	.69	744
1992	75	41,296	72775	3,097,214	43	30	6	9	1.85	2,303
1993	100	54,246	97257	5,424,584	56	37	9	9	.37	3,832
1994	102	68,859	92912	7,023,667	76	32	15	9	1.91	5,327
1995	115	71,845	101995	8,262,218	81	40	32	9	.93	4,388
1996	103	79,774	89475	8,216,717	92	45	43	9	1.96	5,506

Source: WWF Programme Office-Harare and grain Marketing Board, Zimbabwe

Notes: Maize price is marketing board's selling price of unmilled grade D maize, an amount thought capable of providing enough staple grain for a small family for 4-6 weeks. Population data is not updated over time to reflect substantial in-migration and splitting of households, hence average benefit may be somewhat overestimated. The fall in households in 1996 is due to some Districts still to report
n.a.= not available

incentive framework." (SO1 Document 1997) The discussion in this section focuses on key NRMP II initiatives to provide that support, with attention to their social and economic impacts. The discussion is organized into the following topics:

- The CA as the lead organization;
- Financial support for decentralization and the CDF;
- Issues relating to infrastructure development;
- Empowerment of local communities and the ZimTrust;
- Reaching communities through public education and Action; and
- The social and economic impact of NRMP II and CAMPFIRE activities.

Evaluation Issue: Establishing the CAMPFIRE Association as the Lead Organization. *"To what extent has NRMP II assisted the Association in assuming its leadership roles/responsibilities." "To what extent have collaborating agencies, as well as the GOZ, accepted the Associations's leadership." "To what extent is the Association's Secretariat responsive to the aims/objectives expressed by the Associations's Board of Management." "To what extent has the Association been successful in defining and fulfilling/meeting its roles/responsibilities to its increasing number of members ?" "Discuss the role and impact of the institutional contractor in these areas." (A.8)*

As noted, the CA serves as the lead agency in the implementation of the CAMPFIRE program. It exercises this responsibility through a program of advocacy, coordination, and information dissemination, both local and international. The CA has a Secretariat, much of whose agenda entails serving the interests and coordinating the activities of the other implementing partners, known collectively as the CAMPFIRE Collaborative Group. The CA is also responsible for chairing and coordinating the activities of the PET. (See Section B. III for a more detailed discussion of the CA's performance and related recommendations, and for an assessment of the PET.)

Box 4. CAMPFIRE Association Mission Statement

"We provide services to member RDCs to enable them to engage in sustainable natural resources management and development so they can improve life in rural areas through participatory rural development."

Source: CAMPFIRE Association, Strategic Plan, NRMP II, 1996-1999, p. 1

The CA constitution calls for a Board of Management, comprised of 14 members elected by the general membership. The Board makes policy, issues policy guidelines, approves annual budgets and workplans, and oversees staff employment. It enjoys direct linkages with government. The CA Executive Director is charged with implementing Board policy.

It is too early in the CA's institutional evolution to make final conclusions regarding its performance as lead agency. It has only had approximately 18 months to organize itself and install the necessary management infrastructure and processes to discharge its responsibilities fully. In its effort to acquire the essential capacity to administer the program, the CA has received effective assistance from the IC.

Although the MLGNH recognizes the CA as the lead CAMPFIRE agency, it is critical of the current focus, organization, and implementation of the Programme, which it believes subverts the original intent. CA revenues, they argue, go largely to support CAMPFIRE Secretariat, the CCG, and NGOs. The MLGNH would like to see a greater percentage of funds going directly to the RDCs.

The MLGNH envisions a different CAMPFIRE model that it views as preferable and more sustainable. Under its model, the RDCs would comprise the CA. They would appoint an executive committee (e.g., five RDCs serving for a set term). An executive director with 3-5 person staff would serve the executive committee. The GOZ and donors would provide assistance to the CA, as appropriate.

Conclusions

The evaluation team concluded that the CA has been effective in promoting CAMPFIRE. A key CA objective, as listed in its constitution, is "to promote the fundamental principle enshrined in the CAMPFIRE concept of proprietorship of natural resources by producer communities." CA staff are effective in articulating the CAMPFIRE philosophy to diverse audiences both in Harare and in the field and have gained international exposure. Clearly, the CA can perform the program advocacy role and enhance it further with the help of specialized agencies such as ART.

With respect to the MLGNH criticism, the CA is using its funding as the GOZ and CA agreed to, and the CA itself recognizes the need for the kind of material and technical capacity-building support its CCG partners are providing its RDC constituents.

2. Providing Financial Support for Decentralization

Evaluation Issue: The CAMPFIRE Development Fund (CDF). *"The CAMPFIRE Development Fund was designed as a project-specific mechanism to redress leadership, coordination, and customer satisfaction lamentation. How has it performed in addressing these concerns? What can be done to improve its performance? What should its ultimate status be? Should it be project specific and allowed to dissolve at the end of NRMP II or is a longer term approach warranted? What might that approach be? Options that are possible include a simple grant fund, a matching grant fund, a special revolving loan fund, a trust fund, an endowment, etc." (SOW, section C3a)*

Even before the CDF was set up, many staff members of the CCG organizations encouraged the RDCs to submit proposals. As a result, when they began operations, the IC and PET had to sift through over 200 requests for funding. Few of these were fully developed proposals or directly relevant to the project's conservation and NRM objectives. Most PET members felt that the quality of the proposals was very low. Many were for inappropriate projects that rarely embodied CAMPFIRE principles. Considerable guidance, rewriting, reworking, visits to prospective grantees to discuss and review proposals, and negotiation of proposals by IC staff members, consultants, and CCG members in Harare were necessary to get fundable projects from the RDCs. Staff attempt to incorporate commentary by the PET full committee and subcommittees, the IC, and USAID in the final grant awards. Eventually the CA, IC, USAID, and CCG agreed to a three-page grant and proposal guideline form that was distributed to all RDCs. Despite these problems, the CA has been urging fast award of the grants, mostly by requesting that the IC conduct pre-award surveys and by hiring staff and a consultant to assist the RDCs in developing their proposals.

Even with this considerable effort, few actual or proposed projects contain participatory approaches to diversified CBNRM at the village and ward levels. Instead, the PET and USAID judged that an initial round of direct institutional support to the RDCs was called for. One byproduct of this entire process is a relative homogeneity in grant design. Each grant thus far has contained similar elements. There are line items for capital equipment, such as trucks, computers, radios, office equipment, camping equipment, motorcycles, and mountain bikes, followed by a line item for new RDC staff positions. The grants also pay for technical assistance and training, often supplied by third-party trainers such as the ZimTrust, ACTION, or WWF. Line items for "soft" expenditures such as training and minor equipment (flip-charts, radios, camping equipment, look and learn visits, etc.) constitute only a small percentage of the overall grant and rarely exceed $US25,000 per grant over a one-year period. Grantees typically hire RDC CAMPFIRE Coordinators and equip them with a vehicle, radio, and computer. Most also hire additional ward promoters, game scouts, and resource monitors and equip them with camping equipment, mountain bikes, and radios. RDC staff manage and control the funded activities.

As of February 1998, the CDF had made 20 grants to the RDCs, obligating $Z24.2 million, or about $US1.6 million. The first grant went to Hurungwe in October 1996, followed by Mazoe and Gokwe North. The most recent grant, approved in February 1998, was to the Kusile District. Of the first seven grants made, only the Hurungwe RDC had significant CAMPFIRE wildlife income. Not until May 1997 did the biggest CAMPFIRE revenue-producing District, Nyaminyami, receive a grant. The PET project subcommittee staff felt that the high wildlife revenue-producing Rural Districts did not need a grant as much as the RDCs with little or no existing Programme revenue did. The RDCs themselves have made total cash and in-kind contributions to the grant activities amounting to 22% of the grants.

The 20 grants issued to date have been used to purchase 19 trucks, 20 computers and printers, 26 two-way radio sets, 6 motorcycles/motorbikes, at least 76 mountain bikes/standard bicycles, 5 fax machines, 2 cameras, 12 sets of camping equipment, and at least 15 sets of assorted office furniture. The grants have also been used to pay for some technical assistance and at least 121 salaried resource

Table 9: Distribution of CDF Grant Benefits (in $Z at 1$US = $Z 15)

District	Total Grant	% of Grant in District Capital Equip.	% in District Wages	% District Training	Sum Directly Benefiting Ward	% Benefiting Ward	New Ward Jobs	New Council Jobs	Job Titles At Council Level
Mazowe	673,000	63%	17%	11%	25,000	4%	0	2	Campfire manager and clerk/typist
Chipenge	826,980	57%	23%	12%	72,210	9%	0	2	Co-ordinator and clerk typist
Gokwe North	774,777	65%	9%	10%	122,006	16%	0	1	Project Bookkeeper
Hurungwe	917,860	65%	8%	9%	167,000	18%	0	1	Assistant Campfire Coordinator
Nkayi	874,020	49%	16%	11%	190,500	22%	10	2	Assistant Campfire Manager, clerk/typist
Bulilimamangwe	1,293,200	40%	12%	21%	354,600	27%	2	2	training officer and accounts clerk
Chimanimani	1,381,000	35%	14%	23%	379,840	28%	4	2	Campfire manager and clerk/bookkeeper
Nyanga	1,340,040	40%	8%	24%	378,040	28%	5	1	Campfire manager
UMP	1,104,920	28%	22%	14%	333,220	30%	4	2	campfire coordinator and clerk/typist
Binga	1,698,700	42%	9%	20%	551,000	32%	0	2	Campfire Training officer and clerk/typist
Gwanda	1,592,650	42%	9%	15%	527,300	33%	5	2	Campfire manager and clerk/typist
Beitbridge	1,483,280	29%	13%	25%	494,880	33%	12	3	Training Officer, clerk/typist, Campfire Promoter + maintenance paid for by USAID
Kusile	1,493,300	42%	7%	17%	498,300	33%	6	1	Campfire Coordinator
Mudzi	1,187,910	34%	14%	11%	407,810	34%	15	2	Campfire Coordinator and clerk/typist + maintenance paid for by USAID
Muzarabani	1,348,428	28%	6%	8%	477,000	35%	10	2	Campfire Training officer and accounts clerk
Nyaminyami	913,600	46%	0%	28%	325,000	36%	11	0	
Chiredzi	1,218,850	26%	12%	25%	444,800	36%	9	1	coordinator
Tsolotsho	1,014,700	30%	16%	15%	391,000	39%	0	2	Training Officer and typist
Guruve	1,695,000	19%	9%	9%	800,900	47%	10	2	training officer and accounts clerk
Rushinga	1,403,505	31%	12%	9%	684,150	49%	18	2	Institutions Development Officer, clerk/typist + maintenance paid for by USAID
TOTAL	**24,235,720**				**7,624,556**	**31%**	**121**	**32**	
AVERAGE	**1,211,786**	**41%**	**12%**	**16%**	**381,228**	**30%**			

Source: CDF grant files

Note: A typical grant creates a new Campfire Unit at a District Council (if the Council does not have an active Campfire program), or it may expand the existing Campfire staff at the Council level. This staff is then equipped with a vehicle, a computer, printer, fax, flip-chart, and sometimes office equipment. In many cases additional ward promoters, game scouts, or resource monitors are hired and equipped with camping equipment and mountain bikes. The whole group are then equipped with several two-way radio sets. All staff are supervised by the District Council Campfire manager who in turn is hired by and reports to the District Council Executive Officer.

before approving grants that contain salary line items (see the various PET and PET subcommittee minutes). The assumption and promise that the RDCs will sustain these new staff members with other funds has no economic basis. In Rural Districts that do not have much chance of generating a wildlife-based income stream, alternative natural resource income streams are not specified. The short-term expansion of salaried village and ward-level resource monitors and promoters could jeopardize the long-term sustainability and credibility of the program. Districts that once relied on a sustainable combination of volunteer labor and a smaller number of salaried monitors paid out of CAMPFIRE revenue may find this approach to be more difficult in the future.

- Grants to the RDCs have not been made conditional on their having a track record of applying the desirable revenue-sharing levels recommended by CAMPFIRE, as articulated in CA policy. Opportunities to encourage some of the wealthier CAMPFIRE RDCs to apply the rule are thereby lost.

Recommendations

The CDF should be maintained as a separate fund under IC management until the end of FY2000 (September 2000). Consistent with the FY2000-A and FY2002-A scenario (2000-2002), the CDF should be progressively transferred to a distinct and separate grant management unit within an existing Zimbabwean organization. (The last section of this evaluation and Appendix G outline recommendations for how the sinking fund the team recommends for the future of the CDF might operate. The team did not see locating the fund elsewhere in the southern Africa region as a desirable option for CAMPFIRE because of the importance of sustaining Zimbabwean ownership of the Programme. However, keep currency held with an international offshore financial institution, protecting the capital by permitting the funds to be held in hard currency. The IC can continue to *advise* a CAMPFIRE (CCG)-level committee as it begins to interact with the sinking fund or trust organization managing the CDF. The IC can also continue to administer existing and pipeline institutional and infrastructural grants as per the current modus operandi.

During the transition and phaseout period of USAID/Zimbabwe's assistance, make every effort to manage the remaining funds in the CDF as if a sinking fund were already in place. Develop simpler procedures for grant allocation, pre-award certification, and grant approval, and make greater use of quick-release mechanisms for small grants. These procedures might require setting up a grants management unit inside the IC and operating with a modest, fixed, annual grant budget. For example, a fixed amount of about US$500,000 could be allocated to the annual CDF grant budget, of which 15% could be used to finance the overhead costs of a three-person grant management unit (project officer, finance and database officer, and administrative assistant). The overhead funds would also cover local travel costs for this staff and the costs of routine meetings of a rotating panel of voluntary jury members who would review proposals.

The CDF should be used to continue funding RDC capacity-building over the short to medium term. CDF funds should be sufficient, beyond what has already been spent, to finance two new

projects under consideration, and at least five capacity-building projects for new RDCs, for a total of about $850,000 between now and the end of FY1999.

The CDF should be opened up to a wider range of potential grantees, specifically, to any registered private or public organization in Zimbabwe. These include NGOs, RDCs, government departments, conservancies, user groups, associations, cooperatives, universities, and any other organization legally able to receive grant funds under Zimbabwe law, as well as current CCG members. The only constraint on eligibility would be maintenance of minimal acceptable standards of financial accounting as per USAID regulations and US law affecting the use of foreign aid funds. Although in practice this requirement would eliminate the vast majority of potential grantees, organizations that did not meet the standard (such as women s clubs and ward organizations) would certainly be free to partner with a stronger, support NGO that did meet the requirement. Such mentoring partnerships should be explicitly favored in a revised grant criterion. Criteria would change to reflect the post-Mission closeout arrangement, if adopted.

The ambiguity created by the overlapping roles some organizations play in grant preparation, approval, management, and execution should be rectified as soon as possible, in part by involving neutral reviewers and in part by establishing an explicit set of approval procedures. These changes will be increasingly important as the fund is opened to a wider pool of potential recipients.

Following FY2002 (September 2002), a neutral review committee, to be comprised of a selected, voluntary panel of representatives of the CCG and other parties interested in and involved with Zimbabwe's CAMPFIRE movement in general (such as retired faculty, former members of the Board of Management, etc.), should be set up to handle the proposal approval process. To keep the post-NRMP II CDF vibrant, the CA should consider delegating chairmanship of this "CAMPFIRE Fund Committee" annually among the CCG movement partners. A long-term local administrator could be employed, using Fund revenue, to manage the links between the CAMPFIRE Fund Committee and the organization administering the fund. The funding agency can monitor the administrator. A two-stage proposal process on a competitive basis, as described in Appendix G, should be considered.

Once the fund is put on a competitive basis, USAID and the GOZ should revisit the necessity of pre-approving grants to non-RDC CDF grantees. It is common practice for donor agencies to send annual reports to the Government that include a list of the grants made, with a brief synopsis of their purpose and activities. USAID might again try, with the Government, to get agreement to operate on this less stringent basis.

Evaluation Issue: Infrastructure Development. *"To what extent has NRMP II and CAMPFIRE implemented policies and procedures to properly review the technical feasibility of proposed infrastructure development activities and what if anything should be done to further promote the sound design and implementation of infrastructure development activities?" (SOW, sec A.9.)*

To support proposal development, USAID held a training session in 1995 on the seemingly user-friendly Environmental Screening Form it developed to accompany a user-friendly environmental screening form (ESF) that accompanies proposals to their final approval. It held a training session in 1995 on the ESF, with follow-up sessions in Southeast Lowveld and the Eastern Highlands. The form was also introduced at a broader proposal development workshop held in November 1996 for CCG members and RDC staff. These various initiatives have, however, had no noticeable effect on RDC proposal development and did little to improve capacity to produce substantive proposals. Those developing proposals use private sector consultants and contractors through the practice of requesting tenders for a specific concept, such as an elephant fence, and then using the submission to develop the specifications and costs of the proposal.

When investments are made in physical infrastructure using CAMPFIRE wildlife or other revenues, the projects typically involve schools, grinding mills, water developments for wildlife, and wildlife fencing. Schools and grinding mills represent low technological risk, certainty of markets, and only moderate risk of management failures. Water points and wildlife fencing pose moderate to high levels of technological risk and higher risk of management failures because of a lack of attention to operations and maintenance.

Conclusions

The concerns expressed about the economic, environmental, technical, and long-term sustainability of most of the infrastructure-type project ideas are legitimate. The feasibility studies should not be sped up and their quality jeopardized by a need to accelerate expenditures. With no mechanism for producing sound proposals expeditiously, the CDF runs the risk of being a fund that distributes benefits to districts and communities on the basis of non-technical factors. If the initial plan to fund US$3 million in CAMPFIRE infrastructure is to be retained, increased technical support for the development of infrastructure grant proposals will be essential.

In the time remaining until the end of FY2000, it is unlikely that the CDF can finance more than a few infrastructure projects. There is not enough available engineering, economic, and environmental expertise in the CAMPFIRE administrative structure to analyze problems, examine alternatives, and develop worthy proposals. Under current procedures, outside consulting services cannot be procured without a lengthy process of preparing terms of reference and going out for competitive tenders. Without a project extension, little time would be left for implementation, monitoring, and oversight. In addition, most infrastructure projects would take years to implement, thereby going well beyond the NRMP II's project life. With an NRMP II extension until September 2002 and with outside consultants, there would be ample time to prepare perhaps 10 to 20 infrastructure projects in time to secure for funding under the CDF.

In developing proposals and before selecting a proposed project, more attention needs to be paid to a correct definition of the problem and a more complete examination of a range of alternative solutions. Fire management projects, for example, are risky because the technology is demanding and the effectiveness of fire control (as opposed to the management of risk) is not easy to demonstrate.

Findings

The ZimTrust was established as a charity in the United Kingdom soon after Zimbabwe's independence and was registered in Zimbabwe as a Welfare Organization. The ZimTrust has been receiving USAID support since December 1989 and depends on USAID for 75% of its funding. Current funding runs only through September 1998, and its future in CAMPFIRE is "uncertain," according to ZimTrust management.

ZimTrust's objectives are the "relief of poverty and the improvement in the quality of life" of the poor in Zimbabwe. Its policy is to support "the development of representative community-based institutions of an economic nature." The focus has been on the communal areas and on support for institutional development at the village and ward levels, especially to help facilitate organizational and management capacity and a capacity to manage financial resources and run projects.

Box 6. USAID Funding to the ZimTrust under NRMP I and II (US$)

1989-1992		2,706,000
1st Amend.	(- 1993)	768,800
2nd Amend.	(- 1994)	50,000
3rd Amend.	(- 1995)	325,000
4th Amend.	(- 1995)	3,390,412
5th Amend.	(- 1997)	1,197,016

ZimTrust initially began its CAMPFIRE involvement by providing services to the Guruve and Nyaminyami Districts and later to four districts in Matabeleland as a pilot project. Currently, ZimTrust is obligated under NRMP II to provide services to all RDCs and other support agencies. It seeks to benefit rural communities through institutional development, training, and advisory services to enable them to use their natural resources in a sustainable manner and to manage the income derived from such use. The range of services include: assisting in training for the wildlife monitors; development of infrastructure (e.g., electric fences and watering points); training and technical assistance for area managers in the districts; necessary vehicles, radios, office equipment, etc.; the involvement of women in wildlife production and management; conservation education and training for schools and communities; and development of wildlife and development curriculum and material for secondary schools.

In terms of field operations, the ZimTrust facilitated establishment of the CAMPFIRE committees under the CA umbrella; those members are democratically elected at the village, ward, and district levels. It has provided for USAID-funded infrastructure for the RDCs to work in, as well as for training for all committees on the organization and management of the Programme-- tendering, marketing their safari area, setting quotas, and the functional skills needed to manage a business. It has helped the communities invest their money in social and income-generating projects.

In many ways, it can be said that it was ZimTrust that effectively operationalized CAMPFIRE at the village, ward, and district levels through its early capacity-building support. It took the early risk of pushing the new idea of decentralization at a time when the local levels were just beginning to think about it. ZimTrust has been involved with conflict resolution and confidence- and awareness-building

Recommendations

ZimTrust should develop, in collaboration with the CA and concerned RDCs, an exit plan for the specific activities it is currently working on with the RDCs through NRMP II. It should develop new activities in conjunction with other donor funds or partnerships, or even through community support in accessing future CDF funding.

The project agreement should be amended to extend the timeframe of ZimTrust's involvement in NRMP II. Given its excellent support to CAMPFIRE in both Phases I and II of the NRMP, and the regional placement of its personnel, the ZimTrust is uniquely positioned to achieve field-level results.

Continued funding for the ZimTrust should be channeled through the IC, as is currently done with the other CCG CAMPFIRE partners. This recommendation in no way reflects negatively on ZimTrust's capacity to manage and report on USAID funds, something it has done in an excellent manner and in full compliance with the intent and requirements of the contract. The reasons have more to do with creating a perception that USAID is treating the CCG partners equitably in its funding and with improving relationships within the CCG and between USAID and all its grantees. This step will also enable all CCG partners to move toward a USAID graduation and closeout plan under the same parameters.

Evaluation Issue: Reaching Communities through Public Education -- ACTION

Findings

ACTION Magazine, an affiliate of ART, was established in Harare in 1987 (see Box). It began participating in CAMPFIRE in the first phase of the NRMP project and has expanded its activities to include information, communication, and training and environmental education linked to CBNRM. It has had experience operating similar activities in the wider Southern Africa Development Community (SADC) region. Under NRMP II, ACTION has been operating as a subcontractor to the ZimTrust under a grant. It sees its role as performing outreach within the CAMPFIRE Districts.

Box 7. ACTION's Overall Aim

Increased awareness of environmental education with a focus on CBNRM.

ACTION's 1997-98 workplan responds to the needs of CAMPFIRE communities as perceived both directly and indirectly through the input of youth, teachers, extension agents, and the professional RDC staff, as well as other agencies supporting CAMPFIRE. The plan sets forth five outputs:

(1) Effective project management and increased implementation capacity;

(2) Educational materials relating to the environment and health, to be provided to all CAMPFIRE district schools;

All of ACTION's core funding comes from the ZimTrust under the NRMP II project. Management is aware of the danger of dependence on one donor and is actively pursuing other sources of funding.

The evaluation team concluded that ACTION is doing a good job and is a very valuable resource for CAMPFIRE. It sees ACTION as an excellent CAMPFIRE resource for communicating policy changes to rural school children across the country.

Recommendation

Continue ACTION's role in CAMPFIRE, with particular reference to supporting the CCG (with materials) and Ministry of Education involvement in policy dialogue and program advocacy.

Evaluation Issue: Social and Economic Impact of NRMP II and CAMPFIRE Activities. *"To what extent is NRMP-II (and CAMPFIRE, in general) continuing to provide meaningful benefits to participating communities? What if anything, should be done to augment NRMP-II and CAMPFIRE* ***benefits to and impacts on producer communities****?" (Emphasis added) (SOW, A1)*

Findings

CAMPFIRE has championed the concept of directing trophy hunting fees to local populations. Safari operators are well-organized private sector groups, some of whom have excellent connections all over the world. In 1995 these operations generated over US$1,600,000 in revenue from leases with the RDCs for access to communal lands. Of that, initially the RDCs devolved between 50% and 80% to local communities at the ward and village levels. Other districts have become interested in this approach, as have adjacent countries facing similar wildlife/human competition for limited resources. These successes are directly attributable to the CAMPFIRE movement.

CAMPFIRE continues to generate meaningful benefits for participating communities receiving wildlife dividends, despite some problems associated with the RDCs' practices in wildlife-rich Districts devolving dividends to producer communities. Some US$1,090,362 were generated during FY1996 alone, of which about half found its way, in one form or another, to communities below the Rural District level. The ripple effects of this much money, turned over and over, on these local rural economies are impossible to quantify, but must be dramatic. Thus, CAMPFIRE is already an important motor for economic development.

Nevertheless, the team found, as have others, that while non-consumptive resource utilization such as ecotourism and photo-safaris have produced significant revenue increases over the past few years within CAMPFIRE districts, little is channeled *directly* to local producer communities. In some cases, the RDCs have kept the funds for their own use, noting, however, that they generally apply them for the "common good," since "not all district wards can benefit from their 'own' wildlife resources." In other cases, the private sector captures essentially all revenues. As mentioned elsewhere in this report, the CA has made commercial gain from game viewing and cultural tourism a priority for the Programme, and communities are pressing for change. The ZIMSUN hotel

The team observed that village-level purchases of grinding mills have also been popular. They permit local people to grind their corn into flour without the heavy labor of pounding it. Such mills can be seen as a way to redistribute the benefits of the wildlife revenue to the poor, who are the most in need not only of such a labor-saving device, but also of a mill that runs at below normal costs. The team noted such a communal village mill, paid for out of wildlife revenue, in Beitbridge. There the dividends only covered the cost of the fuel and the salary of the miller. The overhead costs for the building and replacement parts were not included in the price of sales, suggesting a role for micro-enterprise advisory services.

Conclusions

Rural communities in the CAMPFIRE Districts are receiving significant benefits from the return of wildlife dividends and from the capacity-building they have received through training, awareness raising, and other field-level institutional development. One of the most important impacts of CAMPFIRE and NRMP II support has been the building of local concepts about local governance, ownership, and management of the local communities' natural resources. These successes will have long-term implications for the country as the ideas continue to work their way through society.

Records suggest that annual CAMPFIRE revenue of Z$500,000 or more should be adequate for RDCs to fund the CAMPFIRE staff costs out of their wildlife revenue share (currently as much as 50%).

Recommendations

Capacity-building should continue to be supported at the district, ward, and village levels, with priority given to the latter. The focus should be on wards and Districts that have identified "new" NRM ventures whose development needs support. That is, NRMP II CDF funds need to be targeted toward helping local communities "with a good idea" for a new NRM venture obtain financial support to develop the ideas into a project proposal that can be submitted to a local bank or other institution for funding. The priority for such ventures should be the wards in CAMPFIRE Districts that currently are not benefiting from significant wildlife dividends.

Where significant CAMPFIRE dividends are being received at the ward level, NRMP II support should be targeted toward looking closely at the issues involved in assuring the long-term availability of this resource. The CA and others should focus every effort on providing the means to protect these resources, including the authority to limit in-migration.

Future funding for capacity-building with the RDCs should not cover the salaries of CAMPFIRE staff if the RDCs can be expected to cover them themselves.

Instrument 26-98, and (3) a new quota-setting guide. The quota-setting guide, which is currently being prepared, is intended to provide wildlife managers with information on techniques, harvesting strategies, and the potential dangers of poor quota management.

An important issue that needs attention is the potential for induced genetic drift because of excessive selective hunting and poaching, as this practice may affect the value and genetic integrity of the hunted species. Excessive selective off-take of members of a breeding population of animals containing a particular trait may have adverse effects on the frequency of the appearance of that trait in future generations. With safari hunting, the trait is usually trophy size (e.g., horn length or tusk weight). Although genetics, food quality, availability, and the age of the animal influence trophy size, monitoring trophy size is a good indicator of the appropriateness of the quotas and hunting offtake (in terms of maintaining trophy size). However, monitoring trophy size does not necessarily indicate the effects of selective hunting on the genetic composition of the exploited species.

Trophies are measured and recorded using the Rowland-Ward system in most places, but the SCI system is gaining acceptance and may become the dominant one. The manner in which trophies are measured has relevance to the selection pressure on trophy animals. Using the example of the African buffalo, if the trophy measurement uses only the length of horns from tip to tip, then killing bulls in the prime of life would be favored. Because wear at the tips of the horn is greater than horn growth in older bulls, their trophies lose tip to tip distance and become less desirable as they age. If, however, the size and/or weight of the horn bosses are included in the trophy record, which continue to increase in older bulls, trophies from these older bulls become more valuable to hunters. This would promote trophy hunting of older bulls, which are thought to be less important in the breeding process, rather than prime bulls, which account for the majority of mating in breeding herds. In the case of the common eland, females may have longer (but thinner) horns than males. A measure that counts horn length, but not thickness at the base, which is usually larger for males, actually favors shooting females to obtain maximum trophy size, which would also decrease the number of mating animals in a herd.

Conclusions

Although it is desirable to devolve most of the responsibility for quota-setting to the districts and wards containing wildlife, other stakeholders still have important roles to play. WWF has a great deal of expertise that is essential to the scientific setting of quotas, and the DNPWLM has the ability to view larger issues such as movements of game animals locally, between districts, and internationally.

If the present quota-setting system is properly executed, it appears it is adequate for most species, even while constantly undergoing adjustment and refinement. Improvements in ground and aerial counts and environmental monitoring will enhance the informational base used to produce quotas and carry out other management efforts. An updated and accessible database from the DNPWLM's NP-9 form should provide better information.

- SUPCAMP has completed wildlife-related land-use planning exercises in all three districts. Although in general communities view land-use planning negatively, villagers in all three project areas, which face serious land-use pressures, have found that planning can help minimize conflicts.

- In the North Gokwe and Negande areas, SUPCAMP has identified some management options, including safari hunting, problem animal management, and game fence management. In Mazoe, safari hunting, fence management, fire management, and water management systems are in place. Non-consumptive tourism, project planning and development, and financial planning, and budgeting are being developed in all three areas.

- All three areas have at least three monitoring systems in place: problem animal reporting, fence monitoring, and hunt return analyses, and financial monitoring is under way in all three areas. Analyses of animal numbers, abundance, trophy quality, hunt effort, and poaching are monitored and evaluated for use in the annual quota-setting.

- Five training manuals on various aspects of wildlife management have been produced, distributed, and tested, with funds from the US Fish and Wildlife Service (USFWS) and SCI. Subjects include problem animal reporting, electric fence projects, marketing of safari hunting, safari hunting, and quota-setting.

- SUPCAMP staff have contributed to the development of M&E methodologies for CAMPFIRE and by extension for NRMP II. Monitoring of sport hunting will be a component of these procedures, as will the SUPCAMP financial/economic monitoring and the NRMP II-funded Multi-Species Project (MAPS) aerial surveys.

Conclusions

The SUPCAMP project is well-designed and documented. Its structure and execution, which are based on participatory activities, are constantly undergoing re-examination and modification, based on experience and observation, in keeping with adaptive management principles. SUPCAMP activities have focused on three CAMPFIRE areas that are fairly representative of other ones with considerable wildlife resource potential. The techniques being perfected in these well-studied areas may then be applied to other areas as they express a need and support becomes available.

Recommendations

WWF should promote the SUPCAMP approach within CAMPFIRE but not at the expense of perfecting it in the pilot areas. Because it is a demand-driven service, continue to inform the districts and wards of the range and utility of SUPCAMP activities. Doing so may allow other CAMPFIRE areas to benefit from the project, which may be expanded appropriately as funding and institutional capacity permit.

WWF strategy suggests that a PAC agent should be hired at times of the year when problems are likely and that the wet season PAC should be marketed as part of the district's quota. It is emphasized that a reduction of the PAC quota may increase community revenue, and if an agreement with a safari operator can be reached, the PAC agent can transfer the revenue from the marketed PAC hunt directly to the VIDEO that suffered the crop or stock losses.

The DNPWLM ended the prior PAC quota because of abuses. Current department policy requires that problem animal complaints be directed to the DNPWLM Provincial Warden, who may choose to allow District officials to handle a certain situation and/or may dispatch an agent to observe the process.

Administrative Issues. Reporting of problem animals by some wildlife-containing districts to Harare is adequate, but in others, the levels of reporting are less than desirable. WWF has developed a problem animal report form (PAR F1), a reaction request form (PAC F2), and a PAC report form (PAC F3) to capture information and communicate need. SUPCAMP teaches problem animal reporting and has developed a handbook to assist people in dealing with problem animals.

Implementation Issues. Often the standard means of frightening offending animals (e.g., noise, lights, fire, or shooting over the backs of crop-raiding animals) eventually prove insufficient to prevent a recurrence. Research to develop non-lethal ways (e.g., use of irritant spray and acoustic systems) to deter elephants is underway in Zimbabwe, and preliminary results are promising.

In North Gokwe in the late 1980s, approximately 44 problem animals per year were reported shot. After inception of WWF's efforts to improve problem animal reporting and offer other management possibilities, in 1992 the total decreased to 3 animals shot for control, and in 1993 2 animals. Many observers view this tendency as evidence of the potential to minimize problem animal conflict if available strategies are adopted. (However, it should also be noted that animal populations in general decreased at that time because of a serious drought.)

Conclusions

Problem animal reporting and control are important issues that can either promote the goals of wildlife conservation or demoralize people who are subject to wildlife-induced life or property loss. Similarly, it can reinforce or undermine Appropriate Authority.

The extent and nature of the problem are often the result of increasing human settlement and subsistence agriculture, particularly in places where elephants traditionally move during wet season migrations or during times of environmental stress. Improved land-use planning and effective district or ward by-laws may be effective tools in minimizing such conflict.

Progress is being made in dealing with problem animals in most areas. This is particularly important in light of the inherent increase in human-wildlife conflict as human populations grow and wildlife habitats diminish. WWF's efforts to promote enhanced problem animal reporting and awareness of

fences in affected districts. Some areas have effective electric fence projects, such as that carried out by the Mastiche Ward Wildlife Committee (with NRMP I funding). Fence menders are employed under CAMPFIRE to inspect and repair electric fences. The WWF's project training manuals and workshops provide CAMPFIRE stakeholders with valuable information about the financial, practical, and ecological considerations of fences.

The downside to fencing is that large-scale fencing is expensive, occasions the most environmental change, and is least likely to be maintained without subsidy. Elephants often learn how to avoid or knock down fences, rendering them ineffective, and electric fences are not effective against some nuisance animals that are small and able to burrow under them (e.g., porcupines, spotted hyenas, and warthogs). Other animals are able to go over the fences (e.g., baboons and vervet monkeys). Some fences are poorly designed, patrolled, and maintained. Electric fences are ineffective unless the necessary degree of care is taken to keep them intact and operational. This work is often arduous and requires an a priori understanding by the communities as well as a realistic commitment of manpower and funds to accomplish.

Because of difficulties in the proposal writing process and, in some cases, insufficient study of design considerations, no new fences have been built under NRMP II.

Conclusions

Electric wildlife fences are expensive in comparison to the damage elephants do to crops. Moreover, although the technology is simple, the fences require rigorous study and design, and elements of the fencing systems are vulnerable to theft and damage. Inadequately designed fences may have negative effects on elephant migrations, which are necessary to the well-being of herds, particularly in times of nutritional and water stress. If a fence cuts across wildlife migration routes, its location may cause long-term management problems. It is not always clear that communities have the ability and willingness to maintain electric fences once in place. The evaluation team observed a number of broken down or poorly maintained fences. Finally, electric fences and PAC treat the symptoms of problem conditions and not the root causes, such as habitat loss and fragmentation, competition for space, inadequate land-use planning and settlement policy, and climatic stress.

Recommendation

The key ingredients of successful design and implementation of electric fences as a management practice need to be studied. Caution should continue to be exercised in authorizing new fence projects and in promoting fences as a panacea for human-wildlife conflicts. Avoid building unrealistic expectations on the part of villagers that will ultimately prove negative to the CAMPFIRE Programme.

Recommendations

The status of the Cessna 206 purchased under NRMP I should be pursued to secure a replacement aircraft as soon as possible. The condition of the two Cessna 336 aircraft the United States gave the DNPWLM should be evaluated and their potential for remote sensing of environmental and habitat conditions and use for the CAMPFIRE aerial surveys assessed. In the short term, USAID should continue supporting WWF efforts to meet CAMPFIRE's aerial survey needs.

The applicability of the recently developed statistical methods and technologies for use in aerial surveys in Zimbabwe should be assessed.

Evaluation Issue: Wildlife Habitat Evaluation and Monitoring

Findings

The loss and fragmentation of wildlife habitat are the most serious threat to conservation in Zimbabwe. The ecosystems around the protected areas are becoming fragmented because of a number of factors, including population growth, poverty, unequal representation, inadequate planning strategies, and compromised market systems. (Metcalfe 1995) Unfortunately, once an area has been associated with some form of human-specified use, it becomes increasingly difficult to allocate the land to more restrictive patterns of use, such as those dictated by wildlife management. (Guyer and Richards 1996) The underlying causes of human-wildlife conflicts are habitat loss and fragmentation, increasing human populations in rural areas, competition for space and natural resources between humans and wildlife, poor or no land-use planning and settlement policy, and climatic stress. These problems are likely to continue throughout the country unless steps are taken to deal with them.

Metcalfe (1995) made some general recommendations for CAMPFIRE regarding the importance of considering physical realities (forage, variation in stocking rates, competition with livestock, and the fragmentation of ecosystems) in designing management systems. However, as is the case with the community-based conservation programs in Zambia, no organization is conducting extensive analyses of the ecological impacts of CAMPFIRE in Zimbabwe (Marindo-Ranganai and Zaba 1995). Although various stakeholders gather data on biological systems and the physical environment, no one is systematically monitoring habitat changes across the whole country or even across the CAMPFIRE areas. The money to do so for CAMPFIRE is, however, available.

The DNPWLM has shelved its previous plans to do this monitoring. WWF is currently planning to help CAMPFIRE examine the options to meet this need. The parties have agreed to the terms of reference for an expert consultancy and are waiting to carry them out. Coordination with the FC and The DNR, each of which is involved in environmental monitoring, had not taken place at the time of this evaluation.

An augmented effort should be made to develop an effective strategy for monitoring key environmental variables as they relate to wildlife habitat changes and conditions, land-use patterns, and baseline environmental variables. To allow for funding constraints, the monitoring could be carried out in selected areas representative of common conditions throughout the CAMPFIRE areas, particularly those whose proximity to protected areas permits controlled experiments as described above.

Execution of the proposed technical consultancy should be accelerated. This and the follow-up design and implementation phases of a monitoring program are critical steps in the process. The relevant subcommittee must agree on the important variables to be monitored, which ones will be the responsibility of the stakeholders, and how the data are to be stored, analyzed, and interpreted. Follow-up on previous work, in particular, needs assessments, community aspects of monitoring, and the cost-effectiveness of various methods, should be carried out.

The support for WWF's Geographic Information System (GIS) should be continued/expanded. Priority should be given to the storage of existing environmental data in an efficient GIS. This effort needs to be coordinated with other GIS activities in Zimbabwe of relevance to CBNRM. USAID may want to involve Famine Early Warning System (FEWS) in this effort.

Improvements in the environmental impact studies of settlement patterns and proposed projects such as boreholes, dams, and fences should be emphasized. Studies on human-wildlife conflict (e.g., Hoare and Mackie 1993) should be supported and expanded.

In light of the constraints of funds and personnel, strategic collaboration should be sought with appropriate outside organizations to further the environmental monitoring work required for CAMPFIRE.

Evaluation Issue: DNPWLM and WWF Performance within NRMP II

Findings

The DNPWLM is the statutory authority responsible for wildlife in Zimbabwe. The major force behind the creation and definition of CAMPFIRE, the Department has been a principal player throughout the Programme's history. The DNPWLM currently employs approximately 2,400 staff throughout Zimbabwe. The CCG was originally formed under the coordination of the DNPWLM.

The Department is charged with a number of activities that are essential to the functioning of the CAMPFIRE Programme. These include review and approval of hunting quotas, participation in aerial and ground surveys of animal populations, training of CAMPFIRE wildlife monitors, poaching control, PAC, participation in quota-setting, applied research, fish culture projects, and participation in various meetings and technical training workshops.

Output 5: Restocking of wildlife in depleted areas. Staff shortages, the high prices for wildlife, a ban on live animal translocation, and the change in department status to a fund have slowed restocking.

Output 6: Project management. This has been achieved through meetings at various forums. The CCU's lack of recognition and insufficient staff, equipment, and transport are obstacles. to implementing the workplan. The CCU commented that little action is being taken on the obstacles to its participation in the Programme.

***Conclusions** (see also the prior sections on aerial surveys, quota-setting, and PAC)*

CAMPFIRE is an interdependent entity whose success is determined by the degree to which all players fulfill their obligations. It is essential that the DNPWLM have a role in the Programme. Even though USAID has made funds available, the Department has been unable to take advantage of those resources to move forward with its CCU. The impact of the Department's diminished role affects other stakeholders, particularly WWF, and the general program. Most of the constraints appear to be of internal origin.

A redefinition of the Department's role, in light of present constraints and future capabilities and needs, would help in planning for the future. It needs to address the CCU, which is having difficulty operating without a defined mandate and decision making powers. Improvement in the level of communication between upper management in the DNPWLM and WWF, which must collaborate with the Department (e.g., for the aerial surveys and quota-setting), is also essential to assuring efficient CAMPFIRE operations.

Recommendations

Translocation and live animal sales activities should be re-initiated. Current DNPWLM policy on live animal translocation must be re-examined. Absent a general policy, specific proposals should be put on a fast track review on a case-by-case basis.

Strengthen DNPWLM field activities and encourage broader re-engagement of the DNPWLM in the CAMPFIRE Programme. Ways should be sought to reinvigorate the involvement of the DNPWLM in the CAMPFIRE Programme, and to provide far more decision making within the Department. To build on and systematize the current pilot fisheries activity, a master plan for CAMPFIRE involvement with artisanal fisheries should be developed and implemented. PAC, quota-setting, and other DNPWLM CAMPFIRE-related administration should be further decentralized. Finally, a study of how the DNPWLM could facilitate devolution of Appropriate Authority or aspects of it below the RDC level should be conducted.

Conclusion

WWF provides essential services to CAMPFIRE. Its work on publications, skills transfer, participatory data-gathering projects, and devolution of responsibility are key ingredients of CAMPFIRE. The WWF training component, some portions of which were curtailed because of a funding shortfall resulting from the effects of inflation on the Zimbabwe dollar, has been an efficient means of transferring the necessary skills. The commitment and professional vision of WWF staff have been integral components in the success of CAMPFIRE, and the need for the leadership and technical competence of this organization is likely to remain high and even to increase as the Programme develops and expands.

Recommendation

Given WWF's demonstrated effectiveness in establishing and achieving its CAMPFIRE goals, its activities should receive continued support, and the WWF training component should be reinforced.

Evaluation Issue: Impact of CAMPFIRE on Wildlife and Habitat, Key Assumption Number One -- Wildlife Resources Are or Will Become Adequate to Sustain Commercial Exploitation

Findings

A valid and urgent question in the CAMPFIRE context is whether the wildlife resource is adequate to provide sufficient commercial returns to assure the engagement and long-term support of local communities. The evidence from various sources indicates that in many CAMPFIRE areas with long-standing CAMPFIRE activities, particularly those in the Zambezi valley, the wildlife resources are sufficient for sustained commercial exploitation. The evidence is less clear or unavailable in other places where CAMPFIRE activities are incipient and in places where wildlife populations and their habitat are inferior.

Most observers consider the hunting quotas in CAMPFIRE areas to be conservative. The maintenance of wildlife of trophy quality and the overall numbers of wildlife suggest that their populations are being sustainably exploited under present conditions. However, mortality factors attributable to catastrophic occurrences are important considerations in estimating sustainable harvest levels. Natural die-offs (as experienced in some areas in Zimbabwe during the early 1980s) are common among wildlife populations, with as much as 65% of a population being affected (Barrett and Arcese 1995). This factor must be included when developing adaptive management models.

There are adequate secondary indicators of exploitation (e.g., those that reflect current commercial practices) in the form of data on trophy quality, wildlife numbers, distribution, and subjective observations from stakeholders in the field. These indicators appear to be sufficient to permit continued wildlife exploitation and other management actions, particularly if applied in an adaptive management framework.

4. Improving Coordination

Improved Programme coordination and improved communication are issues that need to be addressed at every level. The growing number of participating institutions makes the need more urgent. The following section reviews CAMPFIRE (CCG) institutional interrelationships. If institutions, and the people who make up these institutions, are to collaborate, they must share certain common goals and some ownership of the results and achievements. This section also reviews the impact of key CAMPFIRE individuals within their institutional settings. The role of USAID, the most important donor and source of financial support to the various institutions promoting CAMPFIRE within Zimbabwe, is evaluated in terms of its impact on program coordination, local ownership, and the long-term sustainability of CAMPFIRE's impressive achievements. The topics discussed below include:

- CAMPFIRE Collaborative Group;
- CAMPFIRE Association;
- Project Execution Team;
- USAID SO1 Core Team;
- Institutional Contractor; and
- Regional communication, cooperation, and coordination.

Key unresolved issues include (1) coordination of the CAMPFIRE movement, (2) coordination of the NRMP II support effort, (3) financial accountability throughout the movement, and (4) coordination of CAMPFIRE with regional activities and donors.

Evaluation Issue: CAMPFIRE Collaborative Group (CCG): Past and Future Role. *"The CCG, originally the driving force in defining the goals, tenets, and policy direction of the CAMPFIRE Programme appears to have lost much of its impetus. ..Explain the primary reasons for this development. What are the potential consequences of this 'loss'? Have alternatives emerged which can replace the Programme policy advisory body? What should be the role of the CCG in ongoing Programme operations? What, if anything, should be done to promote the long-term renewal of the CCG?" (SOW B-2-c) "How effective have implementing partners been in instilling a sense of* ***Programme ownership*** *among participating RDCs? improved responsiveness and accountability to RDC and community customers?" (SOW C-3-b) "To what extent does USAID's relationship with its NGO partners cause problems in ownership, defining the roles/responsibilities of the various implementing agents and in determining future directions for CAMPFIRE? What, if anything, should be done to improve relationships among all Project partners (expanded team members) in the future?" (SOW A-6)*

Findings

The CCG is a Zimbabwean creation comprised of the organizations active in defining, applying, and promoting the CAMPFIRE principles. Over time, new organization have joined the group. Currently, the active members (the early members appear in bold) and their key functions include:

Instead of effective leadership and coordination by the CCG, the evaluation team saw several instances of intra-CCG squabbling over decisionmaking prerogatives and access to project resources. This conflict may reflect, in part, historical disagreements among the CCG members, but the team believes it also reflects the absence of clearly delineated CCG roles and responsibilities and firm CA leadership in bringing about the needed sense of shared ownership of CAMPFIRE implementation.

The implementing partners have been successful in instilling a sense of ownership among the participating RDCs – to the extent that they consider themselves to be CAMPFIRE. The workplans of these CCG members have been responsible to the beneficiaries' demands for services, although the demand is frequently larger than the institutional capabilities to deliver.

The CA has created, with its partners, a Customer Service Plan (CSP) intended to address customer satisfaction with the services provided. The plan is still only in rough form and has not yet been fully implemented. In addition, information is not shared adequately among partners.

Conclusions

The evaluation team came to three main conclusions about the CCG. (1) Its partners are not working in a truly collaborative manner. Intra-CAMPFIRE rivalries produce tensions that are difficult to channel constructively. However, with the increasing influence of the CA, program coordination under NRMP II's broader support has been much better thana it was under NRMP I. (2) The strength of the CAMPFIRE movement in Zimbabwe will ultimately depend on the ability of current CCG members to draw in new member institutions with greater ranges of expertise and sector diversity. It must not be seen as an "exclusive club," where wildlife interests are the only "game" in town. (3) The CAMPFIRE Programme, as a Zimbabwean initiative, should continue to be "owned" by institutions promoting and articulating CAMPFIRE principles. Shared philosophy and produce are the basis of the CF movement and form a network of institutions. The CA, as the central institutional CAMPFIRE partner within the Zimbabwe CCG network needs to use this lead role in the Zimbabwe CAMPFIRE movement to spearhead Programme coordination, national advocacy of CAMPFIRE principles through its RDC constituency, and championing of the needs for policy reform.

Recommendations

The CCG should sponsor an annual gathering of its members to discuss CAMPFIRE management. Such a meeting should follow the CA's Annual General Meeting and should focus on tailoring services to meet guidance given by the Board of Management. This meeting would eventually replace the NRMP II annual workplan reviews.

The CCG should be a voluntary organization and not have specific implementation ambitions. It should not, for instance, seek funds in its own name to achieve some project. Rather, its purpose should be to:

Within the remaining implementation time-frame, what, if anything, should be done to promote the CA's long-term sustainability? (SOW A8)

Findings

Advocacy, Information, Communication. As an RDC organization, the CA's core business is advocacy of RDC interests in CAMPFIRE. Although CA rhetoric argues that it represents local communities, its interest may not always coincide with the interests of subdistrict groups and organizations, and it has made insufficient actual movement in their direction in this field activities. It should be possible for full membership in the CA to be extended to ward-level economic interest groups to become full members and advocates of CAMPFIRE and their own particular interests within their districts.

Policy. The CA has articulated clear policy positions but is not addressing the policy issues affecting the CAMPFIRE movement aggressively enough, including the development of positions on legislation and policy changes that could help to move CBNRM interests forward. Policy dialogue is an example of an important program goal that, ,for the most part, the CA has not achieved. Only recently has the PET subcommittee met to discuss a policy agenda and task committee members with follow-up responsibilities. No concrete action has been taken on certain items, such as extending Appropriate Authority beyond wildlife, even though these issues have been on the CA agenda for several years.

Monitoring and Evaluation. There is some concern, based on experience, whether the CA can achieve its M&E objectives. Hurungwe, one of the earliest RDCs to embark on CAMPFIRE (in 1992), experienced a delay in the start-up of grant-related activities (until January 1997) that risked quashing its initial enthusiasm. The CA organized M&E courses "...was not well grasped because it has fewer practice examples and more theoretical examples." These statements, albeit limited in scope and depth, when joined with RDC comments about problems with communication and coordination, raise the general issue of the CA's capacity to implement and sustain its current agenda of activities successfully.

Management Capacity. Recent evaluations note that, with the close assistance of the IC, the CA has recently developed the management capacity to use resources efficiently and ensure accountability. The CA leadership also brings a solid base of experience and commitment. The Board has made it very clear that it has delegated executive operational authority to the Secretariat and that it will review progress with the Secretariat on a quarterly basis. The CA's Secretariat appears to be responsible to its Board, although perhaps not sufficiently so. There is a risk of the CA becoming just another "Harare NGO." The Secretariat is heavily involved in a number of key issues, including follow-up to the CITES convention issues, and preparation of input into discussions on new legislation concerning the devolution of mineral rights to districts. To date the Board expresses satisfaction with progress.

represented on the ground principally by the District Councilors and CAMPFIRE coordinators, many of whom have only recently been hired with CDF support. Data on this issue were hard to find since the team found no in-depth evaluations of CA implementation activities in the field. There are some limited observations on this issue in the four CASS draft mid-term evaluations of CDF grants (Nemarundwe, 1998; Mid-Term Evaluation of the Mazowe Rural District Council CAMPFIRE Project; Mid-Term Evaluation of the USAID-Funded CAMPFIRE Programme in Chipinge; Mid-Term Evaluation of the Hurungwe Rural District Council). These draft reports depict the Association as playing somewhat of a remote and, at best, limited role in coordinating CCG activities in the RDCs.

Box 10. CAMPFIRE Association Issues

Strengths

- Lead agency recognition
- National and international visibility
- Effective program advocacy
- Staff skills and experience
- Recently acquired management capacity

Limitations

- Inadequate communication with RDCs and other CAMPFIRE partners
- Ineffective program coordination
- Inability to establish an on-the-ground presence for implementation
- Overextension in activities inappropriate for its skills and capacity

Conclusions

The CA has strengths and limitations that should be recognized and that should guide recommendations. Its long-term strategy underscores the institution's rapid evolution, but, because it does not adequately build on its strengths, it does not appear sustainable. It is still too early to tell if this institution will be able to take the difficult steps needed to reorganize and refocus as USAID assistance decreases.

The CA is still stuck at the RDC level. It has performed well at increasing RDC membership and involvement but has not been as successful as it would like in fulfilling its roles and responsibilities to its increasing numbers of members at the ward and village levels. This suggests broader institutional constraints to becoming more inclusive. Fore example despite Dutch efforts to assist the CA in opening its membership beyond RDC, its constitution remains one for the "CAMPFIRE Association of Rural District Councils."

Through the PET, through significant training and the IC's technical assistance, and through the CA's role in reviewing and promoting the CDF program, NRMP II has assisted the Association in assuming its current leadership role and responsibilities. The GOZ and CCG agencies totally accept CA's leadership of the CAMPFIRE Programme. However, they would like the relationship to be more collegial and less adversarial.

As the lead agency, the CA Secretariat is sometimes seen as the exclusive torchbearer of CAMPFIRE principles, but the development and expression of program principles is properly shared among all partners including CCG members, the Board, communities, and supportive government agencies. Figure 1 shows a proposed model for CA's future. It depicts CA as the lead agency, working

report). One option might continue CA funding at its current level (100% of salaries) through the end of FY1999, followed by a 50% reduction for FY2000. Because of the key lead role the CA plays, the team believes USAID support should continue at this reduced level through FY2002 if possible (see Table 14).

The CA should consider strongly advocating with its members to distribute a maximum of the wildlife revenues to the producer communities and should publish an annual report that discusses the nature and level of RDC revenue distributions and factors affecting them. Such a report would also serve as a means of documenting new diversified sources of CAMPFIRE revenue.

Evaluation Issue: The Project Execution Team (PET). *"Under NRMP II, the Project Execution Team (PET) is the key Project implementation coordination and decision making body. How effectively has the PET functioned in Project planning, implementation, coordination, and communications? What, if anything, should be done to improve PET performance in the future? What is the relationship between PET and the CCG? What should this relationship be? What, if anything, should be done to promote coordinated PET-CCG operations in the future?"(SOW C-3-b) "How effective have the PET sub-committees (e.g. monitoring/evaluation, training, information/ communication, etc.) been in planning and coordinating inter-agency activities? What, if anything, should be done to improve PET sub-committee operations and effectiveness in the future?" (SOW C-3-b)*

Findings

The concept of the PET emerged at a plan of operations workshop in 1994 involving various CAMPFIRE partners and USAID. USAID agreed with the CCG on the need to maintain a high level of Zimbabwean ownership for the Programme, and also saw value in establishing a mechanism to coordinate and deliver funds through the CA more effectively to what was defined as the CA's *primary customer base* -- the RDCs. The intention was to give the RDCs some control over the nature and timing of the services to be delivered to them through CCG partners. It is not clear why these functions were not initiated as part of the then-CCG functions. One reason may have been that the members of the CCG were perceived as not being best positioned to develop the felt need for increased indigenous representation. If there was to be support for the CA to assume the role of lead agency within CAMPFIRE, then it might have seemed appropriate that the CA "control" PET from the beginning. USAID has had a strong voice in the PET.

The SARP NRMP II project document states that "no project specific steering committees or other special management structures will be established to guide project implementation, allowing project management to focus on strengthening CAMPFIRE institutions and structures for maximum relevance and sustainability of program interventions and accomplishments." (SARP,1994:33) There is no mention within the project document of an entity similar to PET.

In practice, PET has become just such a "steering committee." At the time, the CCG was not providing much overall guidance or direction to the program. By default, PET took control of the

That said, PET no longer responds to the realities of the CA and the general CAMPFIRE movement within Zimbabwe. Although it achieved greater coordination of CCG partner institutions, it may have done so at the cost of the evolving role of the CCG within the CAMPFIRE Programme. Clearly, the CCG is weaker today than it was five years ago. It is also true the CCG was not providing a great deal of overall leadership and coordination five years ago.

The CA has begun to use the PET as a means of exercising greater control over its CCG partners. Those not invited to a PET meeting are "out of the loop" on what is going on. Given the importance of the CDF funds and their management within PET -- and the eventual delivery of services to CAMPFIRE Rural Districts and wards -- this situation effectively limits the input from general CAMPFIRE partners. There is a need for other donors and non-USAID-funded CCG partners to have a program-wide mechanism for addressing CAMPFIRE.

Recommendations

Since USAID is going to graduate Zimbabwe within the next five years (and perhaps end funding for the NRMP II even sooner), it needs to begin relaxing its control of the project *now* and to avoid micro-management. Doing so will defacto relocate project control and authority with Zimbabweans, who eventually will have to assume complete program responsibility. Some of PET's current functions should be returned to USAID direct management or delegated to the IC so as to remove the CA from direct program implementation, grants management, and training. Insteadit should rely more on its CCG member partners within the shared CAMPFIRE movement.

USAID's current PET activities should be replaced during the "winding down" phase of program funding (1998-2002). USAID should not plan for more than one NRMP II planning meeting a year with its project implementers *at the CCG level.* At that time, it should review the contracted SOW objectives and results and propose, accept, or reject modifications. USAID's core team should not be involved in the current weekly and monthly PET review of implementation activities, a practice that led some CCG members to see USAID as micro-managing. The evaluation team recommends that, during this period, the CA Board's chairman begin to serve as chairman of the CCG. For the rest of the year, implementers should not be required to participate in further NRMP II organizational meetings. Twice yearly meetings may be held to *communicate* results, field findings, issues, resolutions, and lessons learned, and not for programmatic changes. The latter should be done in small break-out subcommittees, not large plenary sessions.

PET subcommittees, such as policy and M&E, should be transformed into CCG subcommittees.

Evaluation Issue: USAID SO1 Team: Flexibility and Adaptive Design. *"To what extent has USAID adopted managerial changes which make it more flexible in its dealings with its local NGO partners?" (SOW A-6) "To what extent has this design approach (i.e., flexible design approach) allowed implementers to adjust their plans/budgets to meet changing circumstances? To what extent has it allowed implementers to learn from their experiences and incorporate their lessons learned within future work plans?" (C.2.b)*

of long-term, sustained support to achieving results. However, it must be pointed out that the real success has been in the area of sustained wildlife conservation and management, a domain that had a ready, built-in world market. Initiatives in other, non-wildlife domains, without such evident markets but nevertheless with great potential, are only just beginning. The success of sustainable CBNRM in these other areas will also depend on continued, long-term support, if not by USAID, then by other donors.

Because the USAID core team does not have field implementation responsibilities, it must be careful not to overstep its coaching and support to the program. The partner institutions themselves are ultimately accountable for the results for which they have been contracted.

Although the flexible implementation approach practiced through reengineering permits easier mid-course corrections at the program management and oversight level (in Harare and in the PET), it can cause confusion among program implementers in the field. Changes in direction or focus always take considerable time and energy to implement at the field level. When changes occur too frequently, field programs can become cynical and resentful of "wasted" efforts, undertaken to meet a donor's needs. An example is the SO1"M&E indicators," which have gone through a range of modifications and data collection efforts. The effort made to develop, modify, and collect data to respond to these indicators has in some cases increased the information-collecting burdens of the project.

Recommendations

Greater latitude and accountability should be given to NRMP II grantees to make decisions and mistakes, and to learn from them. As recommended by reengineering proponents, USAID should expect its grantees to set clear and realizable performance objectives and outputs, and then give them the time, as needed, to accomplish them without further discussion and evaluation.

USAID/Z should practice "results management" with those partners possessing the requisite management capacity. It should place the implementation responsibility squarely on these NGO partners and then hold them accountable for results and avoid micro-managing. USAID/Z should adopt more of a results-focused project management style: namely, provide maximum discretion to the CAMPFIRE partners to implement the project, and confine USAID/Z staff time to verifying the results and holding the project implementers accountable for specific results. The results achieved should determine the resources received. This approach requires initially setting clear, mutually accepted project objectives.

In future assistance agreements, USAID should require matching funds from each NGO partner up to 50% of the operating budget recommended in this evaluation, so as to move local ownership of the CAMPFIRE movement back where it belongs and to further sustainability of the program. This approach will reduce the current overdependency of the CCG and the Programme in general on a single donor.

The IC's pre-award surveys of the RDC proposals have indicated that the reimbursement method of grant payment is necessary. While this system has created some legitimate difficulties for grantees, its basis appears sound.

The IC's financial staff are in an excellent position to support the RDCs in their review and identification of the audit-related problems associated with CAMPFIRE accounts. The MLGNH provides free audit services, which could assist the RDCs in meeting their annual audit report requirements. The RDCs are still getting financial systems in place that will allow them to better meet the requirement to submit to annual audits required by law. MLGNH has thus limited resources to carry out costly audits and has programmed available audit funds accordingly. The IC's efforts have already helped bookkeeping for CDF grants in the context of RDC budgets. The IC might be able to help RDCs to meet regular audit requirements, so as to further transparency in financial accounting.

Conclusions

The IC has performed its tasks well and carried out its responsibilities with professionalism and fairness. Its record-keeping has been excellent, and its contributions at meetings relating to PET activities have been thoughtful and useful to the execution of NRMP II.

The IC has played a major role in building the CA's capacity, particularly in terms of financial management. It has been effective in increasing the CA's capacity to manage its resources and account for them according to USAID requirements and regulations. Price Waterhouse's pre-award assessment of the CA recommended that the IC continue this close assistance and oversight role with the CA. CA/CCG grantees continue to need limited assistance from the IC to execute their project administration responsibilities successfully. The RDCs will continue to need technical services and training in this area.

It was an early NRMP II strategic mistake to integrate the CA so closely in the decision process for allocating CDF funds It is not useful for the CA to be strengthened as a grant-maker, nor would it have been appropriate given the inherent conflict of interest. This responsibility is also very time-consuming and program-intensive and could only distract the CA from its self-defined principal objectives. It would also place the CA in charge of judging the merits of awarding grants to its own constituents; an neutral but knowledgeable third party would promote higher standards of competition for limited funds.

The professionalism behind the pre-award RDC surveys is unquestionable. However, the standard used may be higher than necessary.

The strengthening of the financial management capacity of the CA was done well and has been very useful to the CAMPFIRE Programme. New CCG grantees could benefit from similar assistance if such services could be extended, in a light-handed way, to them.

management and reporting. The IC should actively meet with and share information with WWF staff charged with data collection and analysis of CAMPFIRE revenue.

- The IC should provide financial management advisory services to a wider variety of new CCG partners that may become recipients of USAID funds in the next few years. The method suggested here is to use the power of information to strengthen and motivate, rather than exerting direct control. This might be done by issuing bi-annual "report cards" for the main CCG grantees, using a checklist to score and rank the presence and quality of internal procedures and managerial systems.

The IC should assist CCG grantees to shift to new grant criteria involving matching fund requirements. In light of the expanded tasks proposed for the IC in this evaluation report, the IC should review its capacity and the likely demand for its services over the next few years, in terms of the scenarios presented at the beginning of the report.

The IC should complete execution of the current CDF grant pipeline and continue to exercise oversight over grants allocated under the current criteria. Between now and the end of FY1999, CDF funds should be sufficient, beyond what has already been spent, to finance two new projects under consideration (including the Veld project), and at least five capacity-building projects with new RDCs -- for a total of about $850,000. The team does not recommend financing expensive game fences out of this fund (a 100 km. fence can cost up to several hundred thousand dollars). Based on the CDF level proposed for the years following FY2000, and if placed in a sinking fund to extend for about 10 years, the CDF funds expended would not exceed $425,000 per year and would go for many small grants to a wide range of new, and old, CCG partners (Table 13).

Evaluation Issue: Regional Communication, Cooperation, and Coordination

CAMPFIRE and the Southern Africa region. *"Has regional cooperation/coordination improved under NRMP II? Zimbabwe's component of NRMP I was expected to benefit from its linkages to the broader SARP initiative, yet the first evaluation reported little tangible progress toward reaching regional consensus and program synergy. If so, to what extent has the NRMP II and CAMPFIRE benefitted from and/or contributed to improvements in regional-level cooperation/coordination? What, if anything, should be done to improve the NRMP II's contribution to regional level cooperation/ coordination? What, if anything, should be done to improve the Regional NRMP's contribution to the achievement of NRMP II specific objectives?"* (SOW A-3)

Findings

A Congressional directive that USAID support elephant conservation initially led to USAID's regional initiative in CBNRM. That directive coincided with the 1988 Sustainable Wildlife Utilization workshop held in Gaborone, Botswana. The outgrowth in terms of USAID field activity took shape under the SARP-NRMP, which tested sustainable use as a means of conserving elephants and other wildlife in three pilot countries -- Zambia, Botswana, and Zimbabwe -- and gave Malawi, which has

CAMPFIRE has had a regional impact in many other ways. Key individuals coming out of the CAMPFIRE movement have taken on important roles in regional organizations. One early CAMPFIRE pioneer now directs a conservation-based community development project in Zambia. One student of Professor Murphree plays an important role in Mozambique's Tshuma Tshata, a local initiative in community-based NRM. It is opening the way for policies and legislation that are being developed in that country. The Agency's Biodiversity Support Project/BIOME was able to use ART and the IUCN Sustainable Use Specialist Group (headed by important CAMPFIRE founding figures) to carry out international visits.

Conclusions

Collaboration between the regional program and national activities such as CAMPFIRE have improved significantly in the several years since the last mid-term evaluation. Synergy between similar CBNRM programs is developing across countries. Shared objectives and agendas are strengthening individual programs. Other programs, for example, have learned from CAMPFIRE's strengths -- its principles, commitment to empowerment, and strong adaptive management approach to wildlife and program coordination -- and from its weaknesses -- the limited degree of devolution, the constraining policies that make change difficult, and the rigidity imposed by the very strong focus on a single resource. With regard to the USAID role, progress has been limited by available staff and management time the RCSA has been able to afford.

Through involvement in neighboring programs, trained and experienced CAMPFIRE practitioners have shortened other countries' learning curves in designing and implementing their programs. The lengthy experience with CAMPFIRE provides the foundation that is permitting CCG members (e.g., WWF and ART) to shift to regional roles. Zimbabwe's presence at regional NRM fora can sometimes be overpowering to smaller and less mature programs in neighboring countries.

Observing the more rapid progress in other countries' programs in recent years has driven home the point that CAMPFIRE is relatively blocked or frozen; some have even argued that it is emerging from a period of backsliding. This team concluded that this exposure has made CAMPFIRE more open to constructive criticism and change.

Recommendations

NRMP II NGOs in the CCG should continue to expand their regional roles and ties but not at the expense of CAMPFIRE and CBNRM in Zimbabwe.

The CA should request RCSA assistance in accessing the lessons of devolution and working with CBOs and local-level producer communities. This assistance could involve workshops and exchange visits for the CA Board, District Council executives, and others, including CBOs themselves.

IV. DEVELOPMENT AND MANAGEMENT

A. Devolution and Issues of Appropriate Authority

Evaluation Issue: Ownership of CAMPFIRE at the National, Rural District Council, and Lower Levels. *"How effective have implementing partners been in instilling a sense of Programme ownership among participating RDCs? To what extent are the implementing partners' work plans responsive to beneficiaries' demands for services? To what extent has an effective Customer Service Plan been put in place to monitor RD clients' level of satisfaction with the services being provided to them by each of the implementing partners? What, if anything, should be done to promote improved responsiveness and accountability to RD and community customers?" (SOW C-3-b) "To what extent does USAID's relationship with its NGO partners cause problems in ownership, defining the roles/responsibilities of the various implementing agents and in determining future directions for CAMPFIRE? What, if anything, should be done to improve relationships among all Project partners (expanded team members) in the future?" (SOW A-6)*

Findings

The essential "owners" of the CAMPFIRE movement within Zimbabwe are the rural communities and their elected representatives at the RDC level. Sustainable management of their natural resources, both renewable and non-renewable, and their socioeconomic well-being are the focus of efforts by the CCG and NRMP II/SO1.

Although a fundamental principle of CAMPFIRE is cooperation and partnership in the pursuit of sustainable management of natural and other indigenous resources, there appears to be more competition than partnership among some CCG institutional partners. One source of this tension is, as noted, differing access to and control of donor money, and the power and support it provides to building a constituency. Moreover, it is not always clear what the focus of the CA, a very young organization, will be, and whether it will rely on government, private, and NGO partner institutions to provide technical support and training.

Conclusions

All institutions adhering to CAMPFIRE principles should have a stake in the ownership of the Programme. The competition and uncertainty over the position of the CA are deterring some private sector organizations and NGOs from joining or fully supporting the CCG partnership. Some think they can apply the CAMPFIRE principles on their own and do not have to be "led" by the CA.

That the RDCs wish to claim "ownership" of CAMPFIRE through their CA is a very positive development, and should permit supporting institutions to play more of an advisory and technical support role to the growing CAMPFIRE constituency. However, it would be a mistake to downgrade CCG members to a status of simple providers. Their vested interests go well beyond that.

Findings

National Level (CCG Programme Partners, GOZ, and Others). CAMPFIRE has been a powerful force in stimulating rural peoples and their elected representatives in the RDCs, along with their CCG partners, to take the development of their own areas into their own hands and to apply the CAMPFIRE concepts. They have supplied enduring ideas and detailed case studies. Their work merits continued experimentation, testing, refinement, and elaboration. The CAMPFIRE literature provides some of the few valid analyses that indicate how sustainable development might yet take place.

The CA, the RDCs' most vocal NRM advocacy group, clearly promotes the concept that the RDCs are to be elected "from the bottom up," and the RDCs are becoming increasingly autonomous in the management of their own affairs. The RDCs know, however, that they have limited capacity for NRM and rural community development activities, and that, to achieve their goals for their Districts, they need various kinds of technical and material support. They have been proponents, often in the face of objections by the GOZ (which strongly favors using all bilateral funding for government agency support), of the need for partnerships with NGOs and private sector groups. An important achievement of NRMP II has been to support the CA in its important front-line assistance to Zimbabwean institutions active in bringing private sector and NGO expertise to bear on the expressed needs of the Rural Districts and their local populations. CAMPFIRE advocates in Zimbabwe continue to push for policy changes that will help rural households, village communities, and wards organize themselves so that they can better manage their natural resources.

The Rural District Councils Act was a major step by the GOZ in decentralizing central authority to the 57 Rural Districts of the country. It was a move to delegate power to local people. No longer could a Minister in Harare make unilateral decisions affecting a particular Rural District without its consultation and support.

Official policy statements and sentiments concerning devolution have shifted over time. Bond's policy log (Bond 1998a, reproduced in Appendix N) suggests what some might consider a negative trend of (recentralization) in the 1995-1997 period. However, recent ministerial statements and expressions of interest in CAMPFIRE by the FC and The DNR suggest that this negative sentiment is shifting toward a more positive view of sustainable use through devolution. The MLGNH has likewise endorsed decentralization: "...decentralization is necessary and desirable based on the clear understanding that it promotes and strengthens democracy and civic responsibility and citizens participate in their governance and democracy." (J.L. Nkomo, Minister, MLGNH, 1998) The Minister of the MMET has gone so far as to say that a current legislative review

> ...will include considering further devolution of Appropriate Authority below the RD level, to the villages and wards...We envision a situation where communities eventually have the legislative backup when they decide to go into business transactions and to negotiate deals on their own without needing an overlord in the form of an RD which should ideally concentrate on being a regulatory body. (February 26, 1998 speech, Harare, Zimbabwe)

communities to take charge of and economically manage their local forest/woodland resources. The Natural Resources Act can take land away for the State if it judges it to be "degraded" and in need of "rehabilitation." Decisions to take land away are not necessarily made in a participatory manner. The Rural Land Act addresses the loss of habitat to resettlement schemes, the State over RDCs and below (e.g., Masoka) and can also expropriate lands, especially unsettled habitat.

The RDCs appreciate CAMPFIRE because it has provided a mechanism for them to gain new sources of (wildlife) revenue delegated from the State. They also appreciate donor funds such as those provided through NRMP II that allow the purchase of vehicles and computers and provide some temporary salary support to help set up CAMPFIRE offices in the Rural Districts, particularly those without significant wildlife dividends.

CAMPFIRE principles serve as "guidelines" that are applied based on the different needs of the different Rural Districts. Their meaning and significance appear to vary depending on whether the organization is a CCG NGO partner or the CA and RDCs. NGOs have quite different objectives than those of the CA and its member RDCs, which are directly responsible for the well-being of the communities they represent. In response to questions from the evaluation team about CAMPFIRE principles, RDC representatives asked, "whose principles are we talking about?" As noted, each Rural District has its own particular set of resources and needs, so that there may be several different sets of them and no standard, generalizable one. Nyaminyami, for example, may not be giving the recommended percentage of wildlife dividends back to its local communities, as some other Rural Districts may be doing, but its circumstances are different. Wildlife-generated revenue is far and away the most important source of funds for the District's multitude social and administrative needs, such as schools or health facilities. Its local communities -- wards or producer communities, among them -- want these services, and the GOZ does not have money to give them. The RDC believes that it is using the funds to benefit local communities, even though they are not receiving the dividends directly. Other Rural Districts, in contrast, may also be able to generate revenue from commercial farms, businesses, mining activities, etc.

Many CAMPFIRE Districts will have access to an additional source of revenue for local infrastructure development through the World Bank's new "Community Poverty Alleviation Project." It should provide the Rural Districts an opportunity to follow CAMPFIRE recommendations concerning the distribution of dividends to communities at the ward and lower levels more closely. The project will make available US$43 million in *grants* over five years for local infrastructure activities in 26 districts, Nyaminyami included, beginning May or June 1998.

The current focus on RDCs may limit the achievement of some CAMPFIRE community development objectives, such as diversification into community-based management of other native indigenous resources. The RDCs may be more interested in promoting "high value" resource development options and pay less attention to supporting the efforts of smaller groupings of communities in the District who are coming together around resources with much less exciting economic potential from the RDCs' perspective. This RDC preoccupation is understandable, given their pressing need for funds to support general community needs.

- Bottom-up *participatory* planning is hard to do, takes a long time, and does not always work. The Rural District Council Act, as revised in 1996, supports this process. The Land Tenure Commission has submitted new recommendations to the GOZ that show the GOZ is seriously considering returning to the concept of the traditional village, with its own circumscribed territory, led by a chief, who would be advised by a popularly elected council of village people. Under this scenario, the VIDCO and WADCO committees would cease to exist, and the territorial or spatial building blocks for the planning effort would change dramatically.

- In some cases, it is not clear that the RDCs have a significant interest in applying the CAMPFIRE principles because they are already able to exploit the resources without revenue-sharing rules. In other cases, when the CAMPFIRE revenue becomes very large, the RDCs are tempted to use the funds for other District-level social development projects. Nyaminyami is a case in point: in 1996, revenue-sharing accounted for only 27% of wildlife revenue, and in 1997 only 18%. The average across the Rural Districts in 1996 was 52%, with a range of from 0% to 78%. Nevertheless, it may be argued that most RDCs *do* represent their constituents and do seek the best for the greatest number of people -- a political reality.

The existence of CAMPFIRE coordinators, game scouts, and game guards at the Rural District and ward levels paid for by local, decentralized government units out of their own wildlife receipts is an important achievement in the devolution of authority. It brings accountability for the conservation and management of the resources to the local levels most interested in their sustainability for their own long-term socioeconomic benefit.

Below the RDC Level (Ward and Producer Communities). Formal devolution of authority below the level of the RDCs in communal areas has not yet occurred. The fact that most RDCs are treating only "wildlife sport hunting income" as "CAMPFIRE income," with other wildlife (ecotourism and photo-safaris) and natural resource income (from forestry, minerals) accruing only to the Districts, underscores the need for clearer and more forceful policies favoring the downward transfer of resource rights.

There are examples, however, of de facto devolution. Interviews with CAMPFIRE stakeholders at the ward and village levels revealed that, in some Rural Districts, democratically elected ward- and village-level committees *do* control CAMPFIRE wildlife revenues and decide how to use the money for the good of the community. Some local interviewees firmly rejected the notion that they would do whatever the RDCs told them to do with their CAMPFIRE dividends. Some Districts, for instance, have permitted the formation of "dam committees" around small dams and bodies of water so as to manage their fish resources. However, the options available to local communities have not been well-developed. NRMP II could support applied research and technical capacity-building on this important topic.

When the evaluation team interviewed people in the wards and villages, the latter expressed a clear sense of "their land and resources." They asserted clearly that they would be able to manage these resources themselves if given the right. This potent concept may receive impetus under the proposed

The CCG organizations and their staff have successfully kept devolution on the local agenda and in use as a significant concept by continuing their experimentation and workshops in the wards and villages of producer communities. The most common action has been to conduct "awareness workshops" to inform producer communities about what rights they have over their natural resources and how they might benefit from their sustainable use. Certain follow-up workshops are designed to empower these communities to act on this knowledge, especially when the resource has a high market value, the case with wildlife.

It appears that tension is growing between the RDCs and villages as people gain experience in applying CBNRM ideas and demand greater accountability of their local officials. At the extreme, the team was informed of an instance where the records on wildlife or other natural resource off-take which are not kept at ward levels, and where the RDCs directly hired and supervised ward-level game scouts, pressures for unrecorded hunts are taking place at the RDC level and that "two sets of books" are or were being maintained on what specific wards should expect to receive. This extreme example underscores the growing pressure and need for further decentralization where it the scale of operations is localized. At the same time, NGOs have been working at the ward levels through the NRMP II to build their capacity to keep accurate records and account for funds (see Appendix K on one Hurungwe Ward).

Devolution of Benefits. As previously discussed, there is scattered anecdotal evidence that the villages and wards are being "steered" on how to use their CAMPFIRE revenues for collective income-generating projects and social services. This "steering" is *not* necessarily bad *if* the schools and clinics built are provided with the necessary paid government personnel. In a similar vein, it appears there is a tendency for observers, supporters, and facilitators to pass judgement on the value or usefulness of what the village and ward committees decide to do with their money once they get it. For their part, the RDCs want to be kept informed on a timely basis of what the wards and villages intend to do with the revenues, since, as the legal authority in the district (and below), they are accountable for all local governance activity, including the utilization of local revenues from whatever sources. For the same reason, they have a responsibility and right to know about the outside organizations working within their borders.

Giving local communities the option of receiving cash dividends, however small, is a strategic masterpiece, as people are then willing to combine their funds for larger activities of social benefit to a wider section of the ward population. This outcome is very satisfactory to the RDCs, as it assists them in providing the social services the central government is not providing. This practice also offers a strong impetus to producers to participate in the Programme and convinces villagers that the RDC is not "holding out on them."

The RDCs and villages often use the revenues and grants they receive to promote long-term resource stability. However, the wards and villages are not necessarily using their CAMPFIRE dividends for specific wildlife management projects. Instead, some have spent their revenues for schools, teachers' cottages, grinding mills, clinics, and household dividends. Three wards are using their funds to maintain game fencing, and one ward is considering using the funds for dam maintenance. Other

Conclusions

Some local producer communities feel no security of tenure over wildlife-related benefits in terms of amounts, timeliness of receipt, stability over the years, and integrity of the RDCs that are responsible for issuing the dividends. As a consequence, the incentive to manage their wildlife resources sustainably may be insufficient. This situation is a major threat to CAMPFIRE in general. It may also require that the RDCs become the "district game department" to protect the source of the revenues.

Within Zimbabwe, the model for decentralization is "co-management" (State and rural partners), and not full decentralization and devolution of authority to rural communities to manage the resources themselves. This model limits CAMPFIRE's applicability to other countries in Africa and elsewhere, where devolution of authority for some natural resource subsectors has progressed further (see text box 8).

To date, progress toward "producer community" management (or "community-based cooperative management") over wildlife and other renewable natural resources remains limited to a few experiments. Murphree states that "the core of the matter is strong property rights for *collective communal units*, not only over wildlife and other natural resources, but over the land itself." The RDCs continue to retain tenurial rights over the entire unit of their communal lands. While they are sharing a portion of the revenue benefits with the wards with wildlife resources, the amounts, timeliness, and consistency of the payments vary, affording little security to local communities. This is CAMPFIRE's greatest recognized weakness and greatest threat to its conceptual roots.

Different resources require different levels of devolution of authority. Whereas it may be appropriate for wildlife, which move around, to be managed at a district level, the same is not necessarily true for other natural resources (e.g., timber, fish in ponds, and forest products).

A return to the concept of "natural resource cooperatives" might be considered, under the authority of the RDCs or with local autonomy.

Greater effort to look at alternative approaches to providing support at the ward and village levels is needed. Despite the existence of counterexamples, too much credence has been given to the idea that Appropriate Authority prevents any other kind of village/ward-level community action program.

There probably is enough latitude at the Rural District levels to permit small-scale support for household- and village-level initiatives (associations, pre-cooperatives and cooperatives, and economic interest groups) aimed at exploiting natural resources other than wildlife, if the resources are available in economically interesting quantities. Organizing across ward and district boundaries, as is already being tried in certain larger private sector-oriented initiatives, may be necessary to achieve the volume and scale needed for economic viability. The economic aspects of such initiatives will need to respect the need for tenure security, and the beneficiary communities should be the producer communities.

Recommendations

The RDCs that crop animals might consider giving a share of the "quota" for cropping to the wards adjacent to these wildlife areas, allowing them to remove the permitted number of animals when and how they wish. This practice would devolve an important resource into their hands so that they will begin to think of these animals as theirs, much as they do their own cattle. The communities would finance the removal of these animals themselves. The RDC could monitor the Programme through the game scouts, who would be involved in the process.

CAMPFIRE support personnel in the CCG and districts (CAMPFIRE coordinators) need to spend more time linking up with other Zimbabwean private and informal sector natural resource utilization schemes. CDF funds could be used to help support promising and sustainable ventures that would provide economic returns to village- and ward-level communities or groups.

CAMPFIRE must get away from the idea that the RDCs must control all income-generating NRM economic ventures, from which they retain about one half of the benefits for themselves. In the case of many small-scale economic ventures, *all* income should accrue to the village- or ward-level associations or cooperatives, with only a small levy being passed on to the RDCs. Examples of this approach are found in many other parts of Africa.

CAMPFIRE should expand technical and organizational support to local user groups such as the "dam committees" organized to exploit fisheries. The devolution models practiced in other African countries might be consulted (see the text box below).

CCG members must harmonize their efforts, particularly in light of the important challenges facing Zimbabwe's CAMPFIRE in the coming years in terms of maintaining current wildlife resources and extending CAMPFIRE activities to other natural resources.

- Rewards, perhaps in the form of selective grant support, for those who apply generous revenue-sharing rules and experiment with bottom-up planning;

- Positive publicity for those RDCs that do revenue-sharing and bottom-up planning;

- Application of negative sanctions for those that fail to do bottom-up planning and are stingy in their revenue-sharing; and

- A clear, up-front statement by the CDF that the degree of resource-sharing and bottom-up planning will be important criteria in judging proposals and requests for financial support.

The CA and all relevant CCG members must pay much greater attention to policy issues. Zimbabwe is entering a period of change, and activity in this area could produce significant, long-term results. The CA should take on policy debate as its major role on behalf of its rural constituents. The CA should encourage CASS to provide analytical support in this area.

Evaluation Issue: Performance of the Ministry of Local Government and National Housing in CAMPFIRE

Although it has not yet had an active day-to-day implementation role, the MLGNH is a key partner within CAMPFIRE because of its oversight responsibility for decentralization and local governance, including the RDCs. Moreover, it is one of NRMP II's GOZ partners in the bilateral agreement and a member of the Bilateral Review Committee. Under NRMP II, the Ministry sets policy, approves CDF grants, and is concerned with RDC, WADCO, and VIDCO accountability for the use of project funds, and with how local peoples are organized and how development initiatives impact them.

Findings

One of the MLGNH's responsibilities is the GOZ portfolio for governance at the local levels. Its official, legal charge is to *establish and maintain the institutions for local governance in Zimbabwe*. Its authority centers on fostering and assuring effective relationships among the various levels of governance, consistent with GOZ law -- provincial, Rural District, ward (WADCO), and village/community (VIDCO). As the exclusive legal authority for local government in Zimbabwe, the MLGNH conducts the initial reviews of applications from the RDCs for Appropriate Authority. It then forwards the applications it approves to the MMET, the ministry with authority over all wildlife issues. It in turn reviews, approves, and returns the applications to the MLGNH, which then notifies the RDC of the decision. Thus far, approval has been 99+% certain.

MLGNH's role within CAMPFIRE is to establish and regulate the institutions of local governance. The Ministry insists that CAMPFIRE structures be integrated with official government structures. In the past they have expressed concern about the creation of "parallel structures" that they believed CAMPFIRE, especially through ZimTrust's field activities, was establishing.

assistance should instead be going directly to the RDCs, which identify needed services and contract for them.

The Ministry concurs with the RDCs that CAMPFIRE natural resource revenues should be deposited with the RDCs and that they, with input /approval from the producer communities in the RDCs, should determine how to use them. One rationale it gives is that the proceeds from wildlife now depend on where the animal was killed, which is not necessarily in the community that made the management sacrifices in terms of cohabitation with the game while it was living. For example, Ministry decisionmakers note, "an elephant which wrecks havoc in Ward 3 and travels through other wards and finally gets killed in Ward 9, 50 km away, benefits only Ward 9, and not the other wards that suffered along the way. It is our hope that the Campfire Association will make wide consultations on the issue." The MLGNH claims that natural resource revenues do not now get deposited with the RDCs and that they get only a small percentage for administrative purposes. The issue of whether the utilization of proceeds from CAMPFIRE activities should be handled by the producer communities or the RDCs still needs debating.

The MLGNH also stated that the allocation of CAMPFIRE resources is overweighted toward CCG support to NGOs (80%), whose "capacity to carry out all the tasks required is doubtful," according to the Ministry. It thinks that all CCG members are aware that they are to work through the local governance institutions established under GOZ policy and law, and that they are not to use CAMPFIRE funds to set up parallel institutions of governance. It argues that CCG members should support ongoing capacity-building programs that reinforce existing institutions. It supports an approach of learning by doing because it builds sustainable systems in the RDCs. The Ministry's stance on devolution is conservative but it is nevertheless, "cautiously delegating power to lower tiers of government and assessing their financial and managerial capacity to handle the added responsibilities."

The Rural District Councils Act (1988, Previson 29:13) permits sub-district local authorities to take action in most areas where government is active and to administer programs, including NRM. With initial approval from its RDC, the local committee can form joint committees and undertake projects to benefit their specific areas. For example, a group of villages could agree to develop some common land for their own benefit (e.g., a tourist park). Under the Communal Land Act (1982, Provision 20:04), any land intended for commercial use must first be "alienated" from the communal lands, and then the Ministry must give its approval. Further, the intended land use has to pass an environmental assessment and other standard qualifications. Given this framework, the MLGNH maintains that sub-district organization and enterprise development are possible within extant GOZ local governance institutions and regulations, and that "parallel institutions" are unnecessary and "counter-productive."

Conclusions

With the exception of CDF grant proposals, the MLGNH has been minimally involved in CAMPFIRE. It should be more involved, since it is the legal authority for local governance in Zimbabwe and will have to approve the devolution of Appropriate Authority below the RDC level.

This section assesses the progress and apparent potential for broadening the economic base upon which the CAMPFIRE principles are being tested. In this respect, several issues may prove key to the future character and composition of the CAMPFIRE movement:

- Actual land-use potential, the institutional capacity to make that determination, and the means of devising an appropriate land-use strategy based on the assessment.

- Diversification of the benefit streams: the economic potential for sustainable exploitation of resources and the prospects for channeling revenues in a manner consistent with the movement's philosophy.

- The depth and breadth of CAMPFIRE management's capacity to accommodate new resources, markets, and modalities of production and distribution.

- The feasibility of using NRMP II funds to bring in new institutional partners to meet the expanded mandate.

These issues are vital and underlie the rationale for recommending continued funding for NRMP II under the scenarios presented in Section V of this document. The evaluation has already signaled that under CAMPFIRE, WWF has made significant steps toward implementing a pilot participatory land-use planning methodology (see Section III.B.2).

Evaluation Issue: Appropriate Land Use. *"What is the most environmentally, economically and culturally appropriate land use strategy among CAMPFIRE's RDC members?"* (SOW B.1.c) *"To what extent have certain key assumptions in the design of NRMP II remained valid? To what extent have certain external risks affected Project implementation and achievements? What are the real prospects for expanding CAMPFIRE beyond its current focus on the consumptive utilization of wildlife (especially the large mammals) within the NRMP II's existing time frame?" (SOW questions C.2.a and C.2.c)*

Findings

A varied set of forces drive land-use strategies in CAMPFIRE communities, including: the relative income derived from wildlife and agriculture; the influence of traditional authorities, RDCs, and the central government; the balance of ethnic and cultural factors; politics; population; the programs of external donors and NGOs; the demands of safari operators; other private sector interests; and rangeland management paradigms. Households, villages, and larger groupings employ a diverse set of strategies to help manage risk, and these are shaped by their natural resource endowment.

In CAMPFIRE areas, the variability of the resource endowment is critical. Severe drought, for example, is always a risk in the communal areas, where annual rainfall averages less than 650 mm. Rainfall is "very erratic," and below 450 mm it is "unreliable." (Child 1995) Between 1989/1990 and 1996/1997 there were six consecutive years of below average rainfall in Zimbabwe, with 1990/1991

termination of people's access to thatch or other veld products, and even restrictions placed on dogs.

- Another condition is met if the producer community has agreed to protect its commercially valuable wildlife and can enforce its decision when the wildlife is on communal territory, while someone else enforces controlled access to the wildlife when it is elsewhere (the problem of a fugitive resource).

- *Communities not only will be willing to manage these resources but also can become capable of doing so, and will invest in this management.* It is simply rational entrepreneurial behavior for a person or group to manage the resources that support their livelihood and to want to improve their management capabilities, if there is a good chance that doing so will pay dividends that exceed the costs. The members of CAMPFIRE communities demonstrate this behavior in the management of their individual farming activities. Management of communal resources, such as wildlife, however, requires the community to act as one body. There are examples of communities, such as Kanyurira, that maintain a wildlife fence because wildlife is a large income earner, just as there are examples of communities that let their fences fall into disrepair, perhaps because they have little meaningful function.

- *With control over resources, farmers' behavior will lead to the improved conservation of the resource base.* Control of resources over time is upon occasion called secure resource tenure or property rights. Many of Zimbabwe's commercial farmers have demonstrated that with secure tenure in the form of usufruct of the wildlife on their private properties, they make wise use of that resource base, protecting it, encouraging it to grow, and making profitable, sustainable, commercial use of it. Communal areas offer farmers few secure rights to resources. Wildlife can be the exception where Appropriate Authority and revenue distribution to producer communities operate effectively.

Some observers argue that wildlife is an inappropriate use of the land because it competes with food security (ENDA, cited in Bond, 1993, and see also Cumming, 1994). This view is based on a faulty concept of food security. Food security is not the same thing as food self-sufficiency, which implies that people are producing all their own food. Food security implies that people can purchase or barter for what they do not produce themselves and are making the best use of all their resources in a market economy.

Where communities prefer wildlife use on a portion of the lands at their disposal, their choice may not only be economically rational, but it may also be consistent with their cultural values based on their long history of hunting and coexistence with wildlife.

Field Observations. Some of the conflicts between villagers and resettlement programs are severe. In some cases, traditional authorities have parceled land out for uses that conflict with communal and/or RDC preferences for wildlife management. In other cases, the RDCs prefer wildlife uses for lands in contravention of the preferences of local communities, which perceive the Councils

Land-use strategies in the CAMPFIRE areas must be based upon sound technical and economic analysis, local self-determination under secure tenure arrangements, and minimal but supportive government involvement.

Recommendations

Through its policy subcommittee, the CCG should consider the applicability to CAMPFIRE of the recommendations of the recent Commission on Land Tenure and the new legislation that purports to give clear titles to communal lands and first-line authority for resolving conflicts to village communities.

Based on a systematic review of the policy and legislative changes now underway, the CCG should establish an operational plan that would enable CAMPFIRE communities to hold appropriate authority over wildlife and other CAMPFIRE resources. Related actions would include communities forming legal associations or cooperatives and revision of the resource laws. Accelerated development of the more exceptional land use mechanisms (cross-District management agreements, local wildlife zones, etc.) Should be accompanied by careful monitoring. These 'test' cases are the type of field activities that the USAID SO team might want to monitor directly.

USAID should devote NRMP II funds to policy change and implementation related to access to and tenure of land and resources. In particular, more work should be done on the economics of NRM on communal lands, taking into account the variety of resources and ecosystems, the insecurity of tenure at present, and the potential for more secure tenure based on indigenous knowledge and use of resources.

Greater understanding of the importance of wildlife income and potential uses of wildlife products as drought insurance in the CAMPFIRE areas that have adequate wildlife resources needs to be developed and disseminated.

Evaluation Issue: NRMP II and Trophy Hunting. *"To what extent is the NRMP II supporting or promoting trophy hunting, particularly but not exclusively, of elephants, in Zimbabwe (directly or indirectly)?"* (SOW C.4.a)

Findings

NRMP II is neutral with regard to trophy hunting: it accepts the right of CAMPFIRE communities to determine for themselves the most economic uses of their wildlife. CAMPFIRE gives people a meaningful stake in their wildlife; and it does not encourage or discourage this use of wildlife. Trophy hunting is conducted through established channels that require and receive no direct NRMP II support.

driven by impressive international demand. Most alternatives for diversification will not be as financially rewarding as wildlife, and as such the RDCs will probably be less interested in promoting them.

Marketable non-wildlife resources on communal lands include forage timber, sand, granite, slate, and woodland products such as wild fruits, bark, scenic sites, certain herbs, palm and grass thatch, Mopane worms, crafts, and butterflies. Many of these products are already subject to lively, informal sector entrepreneurial activity, little of which is regulated and almost none of which is taxed by the RDCs (timber being the obvious exception, subject to FC oversight). The extent to which these products are abundant is also highly variable. Some, such as timber, are not abundant at all. WWF socioeconomic studies indicate that communal land resources provide for about one-third of a household's subsistence needs. (WWF 1997)

Different natural resources provide different benefit streams. The greater the profitability, the greater will be the interest of the RDCs in exerting control for their own financial objectives/needs. Wildlife concessions have been profitable, and the RDCs have a vested interest in satisfying the rural populations who are capable ultimately of undermining this resource. The greater the share of benefits the RDCs provide to their local communities, the greater are the chances the resource will continue to be important into the future. Many alternatives that are not of major importance to the RDCs will nevertheless be important at the ward and village levels.

Minerals (black granite, sand, slate, and alluvial gold) are not renewable natural resources, but they can be used slowly over time or mined quickly for immediate profit. The RDCs will find that the wards are important constituents in determining the long-term use of such resources.

Some indigenous resources are very site-specific, such as scenic views, caves, ancient cave art, bat guano in caves, cultural tourism, and rivers or streams, ponds and dams. These resources are located at the level of a village or group of villages, or even at the ward level -- and should not be seen as major sources of RDC income. Exploitation of these kinds of resources will, however, help small communities develop micro-enterprises. Sustainable marketing structures grouped at the ward or district levels through cooperative structures can serve such enterprises.

Table 11: Diversification in Economic Benefits Through Exploitation of Natural Resources (Actual and Potential) Among Campfire Association Producer Communities

Number and Date**	District	Total # Of Wards	# Wards Receiving Dividends	1996 Campfire Income***	% '96 Income Returned Communities	Approp. Authority?	Eco-Tourism	Live Animal Sales	Misc. Options	Misc. Options	USAID Support?
1, 1989	Guruve	28	11	$3,015	0	Y	Y	Y	Forest Products	Masawu fruit, Bamboo,Beekeeping	Y
2, 1989	Nyaminyami *	16	10	$4,462	18	Y	Y		E.D. Paper Making	Grinding Mills, Impala leather articles	Y
3, 1991	Beitbridge *	18	6	$589	0	Y			Grinding Mills, Irrigation	Ilala Palms, Mining, Sand, Stone Carving	Y
4, 1991	Binga	27	20	$2,131	59	Y			E.D. Paper Making,Impal leather	Grinding Mills	Y
5, 1991	Bulilima-Mangwe *	33	7	$575	44	Y	Y		Mopane Worms, Amarula	Silk Worms, Conservancy Camp, Dam	Y
6, 1991	(Gaza) Chimanimani	28	0	$1,319	na	Y			Fisheries, reptiles, amphibians	Ilala Palms, Babobab rugs, butterflies,forestry	Y
7, 1991	Chipinge (Gazaland)*	33	2	$279	50	Y	Y		Amphibians, reptiles, butterflies	Ilala, forestry. Baobab rugs, Ostritch, T.Village	Y
8, 1991	Chiredzi *	32	9		78	Y			Grinding Mills, Vetiver	E.D. Paper Making	Y
9, 1991	Gokwe North	25	4	$951	39	Y	Y				Y
10, 1991	Gokwe South *	28	6	$0	na	Y			Fisheries, Forest Products		Y
11, 1991	Hurungwe *	40	9	$1,245	50	Y	Y		Grinding Mills, Croc.Eggs	Bat Guano, Forest Products, Beekeeping	Y
12, 1991	Hwange *	27	14	$731	50	Y	Y		Croc. Eggs, Rafting	Hides, Hot Air Balloons	Y
13, 1991	Muzarabani	17	10	$397	0	Y	Y	Y	Forest Products	Masawu Fruit, Bamboo	Y
14, 1991	Tsholotsho *	20	8	$1,317	60	Y	Y		Forest Products, Ostrich	Mopane Worms,Beekeeping	Y
15, 1993	Bubi	12	1	$0		Y					Y
16, 1993	Chaminuka/Shamua	26	2	$0		Y					Y
17, 1993	Gwanda *	20	6	$100	na	Y	Y		Croc. Eggs,Cave Art. Alluv.Gold	Game Fishing, Amarula,Cattle Ranching	Y
18, 1993	Marondera	24	0	$0		Y					
19, 1993	Mazowe/Chiweshi	29	5	$0		Y					Y
20, 1993	Mudzi	18	2	$110	8	Y	Y		Ostrich		Y
21, 1993	Mwenezi *	31	0	$0		Y					
22, 1993	Nkayi	23	6	$0		Y					Y
23, 1993	Nyanga	37	1	$0		Y	Y		Forest Products	Beekeeping	Y
24, 1993	Rushinga	17	0	$44	0	Y	Y		Ostrich, Slate	Masawu Fruit	
25, 1993	UMP Zvataida	15	2	$44	0	Y	Y		Forest Products	Beekeeping	Y
26, 1994	Kusile/Lupane	24	11	$0		Y					
27, 1996	Buhera	30	0	$0		N					
28, 1996	Chikomba		0	$0		N					
29, 1996	Goromonzi	26	0	$0		N					
30, 1996	Matobo	26	4	$0		Y					
31, 1996	Mutoko	29	0	$0		N					Y
32, 1996	Pfura/ Mt. Darwin	29	0	$0		N				Black Granite	
33, 1996	Wedza		0	$0		N					
34, 1997	Manyame		0	$0		N					
35, 1997	Umguza	16	0	$0		Y					
36, 1997	Umzingwane	14	0	$0		N					

* = Field Visits by Evaluation Team

** = Date when District Joined Campfire Movement

*** = Sport hunting, Tourism, PAC hides/ivory, Other, in millions of Z$ (Z$16/1$US)

money realized from the sale of the timber removed from "her" trees in her fields. This is an indication of what may be occurring across the country, as local communities become more assertive over what they perceive as their legitimate rights over natural resource exploitation.

(2) *Mopane.* Where there are extensive numbers of mopane trees, communities have the option of harvesting Mopane worms. Where there are extensive semi-arid and more humid woodlands, bee-keeping is always a good option. Woodlands include grasses that can be harvested for roofing, as well as traditional medical plants. They may also include commercial quantities of amarula and msawu fruit, the latter being largely exploited by the informal sector. Hundreds of tons of both are exported fresh each year from the country. As with amarula, the wild masawu fruit provides a sought-after liquor and is found throughout the Zambezi valley.

(3) It is evident that local communities are not yet benefiting as much as they might from wildlife other than through the dividends from sport hunting. Live animal sales are not yet producing significant income and perhaps are beyond the management ability of most producer communities, although two have been selling roan and sable antelope. Local producer communities have not conducted any meat cropping, although they do culling. For example, Nyaminyami District has an annual quota of 1,500 impala to be culled from their large herds on communal lands.

Some Rural Districts have ecotourism/photo-safari concessions with hotel safari lodges, using the wildlife reserves located along their borders. The team visited Chilo, Hwange, Bumi Hills, and others and noted the substantial and developing potential at these sites. CAMPFIRE is beginning to get more involved in such conventional game-viewing tourism enterprises. International trends in tourism are favoring Zimbabwe and the wildlife/recreational experiences CAMPFIRE offers. There is much less experience with cultural tourism in Zimbabwe or with CAMPFIRE development of archeological, historical, or botanical sites. The tourism based in CAMPFIRE areas in the southern low veld is not yet breaking even, but the first distributions from CAMPFIRE lease agreements with major hotel operators are underway. While Zimbabwean tourism, based primarily on wildlife and the attraction of Victoria Falls, is generally doing well, that based in CAMPFIRE areas has yet to demonstrate viability in all regions. In particular, cultural, archeological, historical, and botanical tourism are virtually untried concepts in these areas.

Bumi Hills/Nyaminyami Case Study

Sun Hotel's Safari Lodge in Bumi Hills has had a long-term (30-year) series of photo-safari leases with Nyaminyami District through the Ministry of Local Government. Each lease is good for 9.9 years and must be renewed at that time. The lease gives Sun Hotel exclusive visitor rights to the nature reserve. Every year the Lodge gives a lease "rent" of about Z$70,000 (US$4,375) to the RDC. On top of this, another Z$ 250,000 (US$15,625) plus or minus -- depending on the actual number of guests -- is given by the Safari Lodge to the RDC, with the intent that the funds go to the Mola Ward, which is adjacent to the 50 sq km concession and is very rich in wildlife and elephant. The Safari Lodge manager also claimed that they have provided funds on occasion to pay the salaries of the adjacent ward game scouts. The RDC has specifically informed the Safari Lodge that the Lodge

Conclusions

There are valid options for diversification and new economic benefits for rural producer communities using other natural resources, although few will be as profitable as wildlife in the areas where it is abundant (Table 11). Mining and timber are the exceptions. These are often profitable activities, with strong connections to world and regional markets. If the CA and CCG members can get the mining and timber industries in Zimbabwe to apply the revenue-sharing concept of CAMPFIRE, they will have accomplished much.

Even some lesser resources may have high potential niches. Zimbabwe's commercial honey exports reach US$10 million a year. It is easy to imagine a "CAMPFIRE" brand organic honey being marketed internationally.

The Councils and CA may be overly optimistic about the potential for ecotourism as a CAMPFIRE revenue-producing sector. There are places where ecotourism ventures are possible and might attract trekkers and backpackers, but the investment will need to be based on careful niche market development and strategic involvement with the private sector.

Currently, CAMPFIRE does not tap into the Zimbabwe tourism sector in any coordinated manner, and CA management is just beginning to think strategically about the sector. The CA Board has no members from the hotel association, the Zimbabwe Tourist Authority, or related organizations. The CA and RDCs are beginning to develop some capacity to negotiate lease arrangements for effective communal, private sector partnerships involving tourism.

Management Capacity. CAMPFIRE and NRMP II possess the breadth and depth of experience and competence needed to expand programs into other natural resource and/or indigenous cultural resources. To do so, however, they must focus on a few target districts and/or wards within districts where there is real potential for success and then to engage the professional expertise (private sector, NGOs, and government) required to put an active program into place. When solutions are refined and successful economic/commercial chains established, and other RDCs learn from the experience gained, they will in turn replicate the models. The target districts/wards should be located in areas where wildlife is not already a major option.

In most instances it appears the RDCs would be better off leasing their scenic areas to industry entrepreneurs and improve their negotiating skills to produce deals that are favorable to the producer communities in those scenic areas. Similarly, NGOs that think they have a good prospect and cooperation in a producer community should try to facilitate the creation of enterprises. However, grant funds should not be used to subsidize the *operations* of such enterprises. A possible role for the RDCs and CCG members is to help monitor and improve the existing tourist leases of major hotel companies on district land, and through publicity encourage these companies to make good on promises to producer communities.

Not enough care has been taken in evaluating the capacity of the Rural Districts to finance their

associations. As discussed elsewhere in this report, the CA Board could invite tourism industry professionals to serve on the Board. The CA should lobby the industry to hire CAMPFIRE community residents and to buy locally, when possible.

- The CA should work with the ART to monitor and form strategic alliances with other tourism associations in the region, such as the Southern Africa Tourist Organization. ART might also help CAMPFIRE establishments get listings in travel guides such as the *Lonely Planet Guide*, which already features some CAMPFIRE sites.

- USAID/RCA should assist the CA and ART in strengthening their regional contacts and alliances regarding ecotourism information, studies, lessons, and institutions.

- The CA should move, without delay, to copyright and register CAMPFIRE to create a CAMPFIRE "brand" name that members can use to establish standards, and market and raise funds.

- The CA should establish a visitors information center in Harare to assist adventure and ecotourists, as well as business and professional visitors. CAMPFIRE documentation, curios, and crafts produced by CA members throughout the country could be sold at this location, making it self-financing.

- CASS (or ART) should carry out sociocultural and economic impact studies of those sites where tourism is being developed and assist the CCG to adapt its ecotourism strategy. This effort should begin immediately by extending Bond's 1997 work through a study of existing tourist facilities located in CAMPFIRE communal areas and covering the extent and impact of local employment, local purchasing, and lease terms.

- WWF should continue its involvement in ecotourism development and marketing.

- The CCG should make sure the RDC and ward-level"customers" have usable guidelines for reporting and developing ecotourism.

Micro-enterprise and alternative NRM development activities should be targeted for Rural Districts that are not yet financially able to cover the basic minimum support needed for local CAMPFIRE implementation (CAMPFIRE coordinator, game scouts, and logistic expenses, and possibly game guards where more revenue is available). Twenty-four of the 36 CAMPFIRE RDCs fall within this category (Table 2). Within the other 12 better-off Districts, there are still many wards without CAMPFIRE revenue. The efforts in such Districts should concentrate on those wards, rather than on the ones with significant CAMPFIRE wildlife revenue.

Significant, increased attention must be given to assuring sustainability of the wildlife resource where it is most abundant and where CAMPFIRE wildlife revenue is still very sizable. Sustainability of this resource in the *wards* must be given greater priority over the efforts under

resource revenues, e.g., timber and minerals, to the local level:

> *CA will seek to expand "CAMPFIRE" principles to other resources...this...will require the existence of legal instruments that will permit members of the CA and their respective communities to utilize various other natural resources....* (CA 1998)

The CA strategy involves a push to get policies in place such as Appropriate Authority mechanisms for other resources, to promote NRM diversification of activities, and to enhance cooperation and collaboration with selected partners. This latter point is the subject of the following remarks, which address the CA's recent incorporation of new partners into the CCG.

Forestry Commission. The FC is a parastatal with statutory responsibility for the forests of Zimbabwe. Of Zimbabwe's 39 million ha of land, 25.8 million ha are forests (using the FAO definition of 10% crown cover). Of the total forest area, about 8 million ha are on communal lands. Another 8 million ha are demarcated as "indigenous forests," which are found mostly in Matabele North Province in the Rural Districts of Lupane, Tsholotsho, Binga, Bubi, and Gokwe.

The FC's Social Forestry Division has submitted a workplan to the PET that asks for Z$3,010,000 for the period April 1998 to September 1999. It plans to enhance the economic contribution of woodland resources by training community personnel and developing community woodland action plans and natural resource by-laws. The forestry plan would include policy studies/research to create enabling legislation for community participation in the management of woodland products (including apiculture).

The Division of Forestry Extension, likewise under the FC, provides forestry services on communal lands. The services include woodland management, but most efforts to date have involved either agroforestry or been woodlot-related. Woodland management has been initiated on state forest lands (e.g., Mafungabusi Forest). There are 8 provincial forest extension managers and 55 forest extension officers in the Rural Districts. The FC states that it is "thin on the ground" and that, if it had the resources, it would increase personnel in the Districts. The FC does not have the funds to hire staff, as donors typically fund operations and not personnel. The FC gave conflicting signals with regard to its intention of joining the CCG.

The team visited one of the Mafungabusi Forest committees. The committee members appreciated their forest access to firewood, mushrooms, Mopane worms, and some thatch, but felt the arrangements granting them the "forest-sharing" rights were part of an ongoing process that would lead to a larger share of the resources and greater long-term assurance of their access.

The Rural District Council (RDC) Act of 1988, the Communal Land Act of 1982, and the Communal Lands Forest Produce (CLFP) Act of 1928 cover the use of forests on communal lands. Through the RDC Act, the RDCs may formulate by-laws to protect and manage the trees on communal lands. The Communal Lands Act overrides the power of chiefs to control the land and provides for land-use planning. Only a few RDCs have used these Acts to manage forest resources or legitimize local-level

introduction of diversification policy in CAMPFIRE, the need has arisen for DNR to be involved as utilization of all other resources which DNR specializes is envisaged." (DNR 1998)

The DNR operates under a Natural Resources Board and various Conservation Committees. It has the principal responsibility for implementing the Natural Resources Act and is involved in efforts to harmonize various legislation related to the environment and the management of natural resources. Prior to independence, there were Tribal Trust Land Conservation Committees and Tribal Land Authority in Communal Areas. Both of these tribal land entities were neglected. The DNR now wants to use its resources along with CAMPFIRE to accomplish natural resource conservation goals on communal lands.

The DNR is the responsible authority for insuring the completion of environmental impact assessments (EIAs) and compliance for development activities. This role is likely to become more important with the passage of new legislation under the pending Environmental Management Act. The requisite EIAs under this legislation will move the DNR into a prominent role in NRM issues involving significant development actions, as will be the case with CAMPFIRE infrastructure projects.

The DNR will bring experience with CBNRM into the CCG. It has been involved in efforts to operationalize the National Conservation Strategy through the District Environmental Action Plan (DEAP) Programme. Like CAMPFIRE, the DEAP is based on principles of community participation and empowerment in NRM. The experiences of DEAP to date, although limited, are relevant to the land-use planning concerns discussed above. The DNR also implements activities under two Agenda 21 efforts, the National Action Programme (anti-desertification) and the Biodiversity Program.

The DNR's Integrated Resources Information System, a GIS-based environmental information database with monitoring functions, is relevant to CAMPFIRE's needs to improve its habitat monitoring capacity and to USAID's intentions to develop an integrated environmental monitoring indicator for its SO1 (see. V.C).

To assist with its diversification initiative, the CA formally invited the DNR's participation, and USAID has agreed in principle to support its involvement. The workplan the DNR submitted to the CCG has five goals:

(1) Establish and build the capacity of a CAMPFIRE Unit in the DNR.

(2) Advise on Environmental Impact Assessments (EIA).

(3) Enhance the capacities of local communities and local groups in NRM. It says it is devolving responsibility and staff to the Rural District level.

(4) Assist in carrying out Natural Resource Inventories, and facilitate sharing of information between the DEAP, the National Action Plan (NAP), CAMPFIRE, and a GIS database on the State of Environmental Resources (SOER).

The entry of the FC, the DNR, and SAFIRE into the CCG is a positive step toward bringing integrated natural resource planning, social forestry, and participatory land-use planning skills into the CAMPFIRE movement. As diversification of CAMPFIRE proceeds, it is important that each institution concentrate on high pay-off model sites that would highlight best practices and lessons for replicability. The addition of SAFIRE to CAMPFIRE brings new and important insights and experience to the issue of diversification. From a rather narrow focus on wildlife, new initiatives will take place involving other natural resources.

Recommendations

The environmental information systems and GIS efforts in the country need to be strengthened and harmonized. Although going beyond a narrow interpretation of CAMPFIRE, NRMP II support for such action is critical to the diversification effort. The DNR, under the Natural Resources Board's aegis, is the best situated to coordinate this action and assist the CA and CCG partners (especially WWF, FC, and DNPWLM) in developing synergy with a broader national effort. Data-sharing protocols, formatting standards, shared boundary files, and other areas need attention.

While diversification is important, NRMP II priorities must continue to include consolidation of the economic and NRM gains made in those Rural Districts that have significant wildlife resources and low population density.

Support to SAFIRE during the remaining time of NRMP II is highly desirable. SAFIRE field technicians should make it a priority within their NRMP II CAMPFIRE activities to help local communities develop proposals for economic ventures involving sustainable woodlands exploitation, to be submitted to banks or other local institutions for funding.

C. Advocacy and the International Context

As indicated in the SOW, in the run-up to the 1997 CITES Conference of Parties, "CAMPFIRE came under intense attack from a variety of animal welfare groups opposed to trophy hunting of wildlife, particularly elephants, and the resumption of the trade in elephant ivory." The debate over this issue, which ultimately played out in the US Congress, raised a number of matters of interest not only to NRMP II management but, more generally, to the US foreign assistance program. This section looks at the overall issue from three perspectives:

(1) Regional, international, and/or US-based advocacy for the down-listing of the African elephant and its appropriateness to CAMPFIRE and NRMP II;

(2) The role and results of ART's (and CA's) efforts in this area; and

(3) The USAID/Z Mission's response to the use of US funds for such activities.

elephant products are, however, reducing Zimbabwe's and CAMPFIRE's ability to generate additional revenues.

The US Endangered Species Act lists elephants as threatened. That status could have negative consequences for the economic value of elephants in Zimbabwe, as it enables the US Government, through the USFWS, to restrict trophy-related imports if it judges the resource to be exploited in an unsustainable manner. Were the United States to find negatively on the sustainability of Zimbabwean wildlife use, the US trophy hunting market, currently representing about half of Zimbabwe's total, could shut down immediately.

Conclusions

Demand for Zimbabwe's wildlife as a tourist resource seems assured, although the rate of growth in consumptive use may taper off as non-consumptive forms of wildlife tourism expand.

Diversification into non-consumptive wildlife tourism offers CAMPFIRE communities economic possibilities. As with other uses, geographic location and resource endowments are critical determining factors. CA producer communities have already demonstrated some potential and nascent capacity for undertaking cultural and ecotourism activities. They have also begun to negotiate revenue-sharing arrangements with game-viewing safari lodge operators. These are seen as a logical expansion of ongoing CAMPFIRE activities.

The international politics of wildlife are a definite threat to Zimbabwe's ability to market products in which it has a definite comparative advantage.

The GOZ's primary role is to assure that people have the incentives to protect the resources that are the basis for international tourism, that the industry is healthy and free to promote its products, and that the barriers to international trade are not increased unnecessarily.

Recommendations

The government must continue resisting the erection of barriers to legal and controlled trade in elephant and other wildlife products. However, it must also devote adequate resources to assuring responsible stewardship of both the public and private wildlife estate and effective safeguards for controlling the ivory trade.

This task should be complemented by government efforts to promote sustainable use of its wildlife products, both consumptive and non-consumptive, by allowing market forces to determine the balance and by encouraging an industry that can market wildlife tourism worldwide.

CAMPFIRE, with CCG support, should encourage government efforts and policies that reinforce the desire of producer communities to raise more of their revenue through improved market conditions. Increasing the local gain from tourism will further enhance conservation objectives.

CAMPFIRE participants are supported by other donors in addition to the United States.

Conclusions

An advocacy role is appropriate and justified for governments, which participate in the international politics of wildlife conservation. Government's devolution of Appropriate Authority to communities engages them directly and, thus, in turn, their NGO partners. In addition, CITES is as much NGO-driven as government-driven, further substantiating the appropriateness of Zimbabwean NGOs supporting CAMPFIRE to participate in the international dialogue surrounding the trade in wildlife products.

The development of international markets for other, less controversial natural resource products on communal lands may justify collective marketing or advocacy efforts by CAMPFIRE and its CCG partners.

If US assistance funds are given to support a commercial enterprise and the operators of the enterprise determine, jointly or separately, that it is in their economic interest to engage in international economic or political operations to maintain or widen their markets, it is not inappropriate for them to use US assistance funds, along with the other funds at their disposal, for such activities. What the NRMP II actually carried out in this regard was consistent with the project design.

The marketing and advocacy activities ART and the CA have undertaken fall within the norms of what USAID has actively supported in other sectors, such as in many export promotion programs for non-traditional agricultural products or for certified tropical timber products. CITES and other regulatory structures are legitimately the object of scrutiny as to whether they constitute non-tariff barriers to trade. Without taking either a technical or moral stand on trophy hunting of elephants, this conclusion reflects widely held US values grounded in fundamental beliefs about the importance of free trade, the democratic process, the rights of indigenous peoples, and the value of a vibrant civil society. As documented in the following sections, this philosophy is what underlies USAID's support for the international activities financed by NRMP II.

Recommendations

CAMPFIRE interests should participate fully, principally through the CA and ART, in the international politics of wildlife conservation to protect Zimbabwe's freedom to enjoy its comparative advantage in all forms of wildlife-based tourism.

USAID should not object to any legal use of NRMP II funds that is consistent with the project design and the precedents of change established through workplans, grant amendments, and the like. This could include activities that have an international political or economic dimension to them where their purpose is maintaining or widening markets.

International Trade in Endangered Species (CITES). It will also monitor international markets in wildlife products and conduct trade policy and regulatory analyzes in support of its international lobbying efforts. In addition, ART will facilitate international networking among similarly interested parties in Africa and throughout the world, to identify and develop market opportunities for program-generated products. Locally, ART will collaborate with the CA in the establishment and operation of the CAMPFIRE information service, and lobby on the program's behalf at the higher levels of Zimbabwe's government. (SARP 1994:40)

To support this role in the NRMP II, ART, which is funded through ZimTrust in what is described as a "holding company" relationship, was included as a contractor under the ZimTrust grant. As per the 1995 Plan of Operations, ART's technical outputs included:

- Monitoring, analyzing, and influencing important factors affecting markets, including selected national and international policy, regulatory organizations, and instruments;
- Developing regional and international support networks for CAMPFIRE;
- Monitoring and informing African nations;
- Assisting the CCG with the operation of an international CAMPFIRE information service;
- Informing and influencing key decisionmakers, media, NGOs, and academic communities in Africa, Europe, and the United States; and
- Challenging and countering arguments against sustainable use as practiced in conservation-based community development.

To assess ART's performance, the evaluation team conducted interviews with staff at its Washington office, discussed ART's role and CAMPFIRE with key staff within the Humane Society of the United States (HSUS), met and discussed the issues under debate with conservation NGOs (WWF, AWF, and IUCN), reviewed extensive letter files from others, interviewed staff, and reviewed USAID/LPA documentation, correspondence, and the related record of Congressional debate. The team also reviewed EU documents related to sustainable use, CITES, and CAMPFIRE. Finally, ART's Harare offices were visited, and key staff shared their experiences and work products with the team.

Findings

ART utilized US$1.168 million of NRMP II funds through December 31, 1997 to implement the work objectives as outlined above. ART successfully accomplished the mission the CCG and NRMP II defined for it and continues to carry out most of the same functions following the termination of USAID funding on December 31, 1997. In concert with the CA, ART has served as a public information arm of CAMPFIRE, reaching an international audience. It is presently replicating the information center for the CA and transferring direct management of the Internet website to the CA.

increasing media coverage...help stimulate further media discussion of CBNRM issues...Positive portrayal of sustainable use of wildlife has increased." (LeBreton 1997)

Among its achievements, ART assisted the British Broadcasting Corporation produce a documentary on CAMPFIRE that the evaluation team found to be very professional in terms of its accurate and direct portrayal of CAMPFIRE's true situation.

Networking. ART created databases of US, Zimbabwean, and other international persons and organizations with a supportive interest in CAMPFIRE, and tries to supply information through these networks on a regular basis. It has given the larger CBNRM database to the CA.

Education. ART conducted seminar/study tours in the region, as well as in the United States, Canada, and Europe (the latter was not US-funded) and hosted visits to CAMPFIRE communities by various groups. ART has produced a very powerful series of posters on elephant conservation that trace each of the key steps in the CAMPFIRE Programme.

Conclusions

ART's performance demonstrates the soundness of the original project design and indicates the need for continuing its services. ART's close collaboration with the CA membership helped decisionmakers understand the stakes in the 1997 CITES down-listing decision and was critical in obtaining support. Its close collaboration with SADC embassies and conservation NGOs in Washington and elsewhere was instrumental in creating a supportive coalition in favor of CAMPFIRE. While this effort grew out of its informational role, which was supported initially under NRMP II, the actual effort and lobbying took place well after USAID funding for ART's Washington office had ceased.

It may be difficult, given ART's strong stands and confrontational style, for it to attempt again to engage organizations with legitimate animal welfare concerns in constructive collaboration with the CCG, despite the scope for dialogue in such areas as PAC and animal population dynamics.

Recommendations

The CA should continue to utilize ART's services and, where necessary, collaborate with it to obtain the financial support needed for those services.

ART should continue to help the CA explore the international market for non-consumptive wildlife use, including game-viewing and cultural and ecotourism. A major or lead role in following regional activities would be appropriate in this regard. It is important that CAMPFIRE stay abreast of strategies and marketing techniques of potential use to the CA's membership. Related networking and facilitation of cross-country visits and other strategic encounters would also play to ART's strengths.

Congress during the CITES and CAMPFIRE debates, but a review of these activities by the Counsel General found that they had not been funded by USAID. The evaluation team made no attempt to investigate this matter further.

The evaluation team found that NRMP II had supported ART's information and advocacy campaign, which attempted to influence international agreements such as CITES and the Convention on Biological Diversity (CBD). The evaluation team believes that, from the Zimbabwean perspective, these are valid and possibly essential dimensions of CAMPFIRE, at least in those Rural Districts where sport hunting makes important economic contributions. As a sovereign state, Zimbabwe remains committed to promoting sustainable use, resumption of legal trade in ivory, and modifications to international conventions and treaties.

The evaluation team also found that, given the confusion of the debate over lobbying and the uncertainty with respect to US commitment to this aspect of the CAMPFIRE Programme, USAID has stopped providing support to ART. USAID's concern is over the appropriateness of its project-funded activities, and not the appropriateness of such activities to Zimbabwe's CAMPFIRE Programme. The evaluation team found that USAID/Z had implemented these changes primarily through a modification of its agreement with ZimTrust (Modification No. 05, Grant No. 690-0251-4-00-9001-00), with which ART had subcontracted. This modification contained special provisions that:

- Confirmed that funding for the Washington office would not resume (effective November 1996);
- Stopped funding for all foreign offices of the ZimTrust as of June 1997;
- Stopped funding for communication "with convention delegates, governments, and other official participants, or communication with the general public or segments of the general public, as part of a lobbying campaign to directly influence any official decision to down list elephants under CITES or to amend the Articles of CITES or other international convention; and communications with government officials, or communications with the general public or segments of the general public, as part of a lobbying campaign to directly influence the introduction, enactment, or modification of the legislation of any country."
- Fully phased out the subcontractor, ART, not later than December 31, 1997.

These steps were taken following scrutiny of ART's activities and considering the controversial nature of its positions with respect to those of the animal rights constituency in the United States, some members of the US Congress, and others.

The IUCN-led initiative to broaden the debate on sustainable use at the CBD is far more compatible with CAMPFIRE than is most of the current CITES agenda, in that it is already oriented toward sustainable use.

designated to encourage the development and testing of technical and social approaches to achieving desired ecological, economic, and other social objectives. Each area is meant to pilot adaptive management, thus promoting learning about how to manage in a changing environment.

Management strategies based on untested scientific assumptions can create problems when agencies and the public demand action based on a poor understanding of cause and effect. (Arcese and Sinclair 1997) The application of management actions that have not yet been subjected to rigorous assessment may lead to the adoption of faulty strategies. In the absence of controlled experimental conditions, which is often the case under actual field situations, the success or failure of a particular strategy may not even be attributable to the actions themselves because of the number of confounding variables that contribute to the observed outcome. In an approach that is gaining increased acceptance, wildlife management is treated as an adaptive learning process (Walters 1986). One approach to adaptive management combines the monitoring of interventions with paired ecological variables in adjacent control areas (Arcese and Sinclair 1997). The occurrence near some CAMPFIRE areas of protected areas containing similar habitat and wildlife communities offers the opportunity to design experiments that can use the protected or minimally managed areas as controls for areas receiving CAMPFIRE interventions. This design squarely depends on adequate monitoring of "ecological baselines," and it has the potential to provide sound information to the adaptive wildlife management approach. Without suitable controls, there is no reliable basis for judging the success of interventions with regard to wildlife communities and ecosystems (Arcese and Sinclair 1997).

Evaluation Issue: Performance of the University of Zimbabwe's Center for Applied Social Sciences

Findings

CASS has been involved in the CAMPFIRE movement since 1989. Former Director Murphree was a key contributor to the fundamental thinking behind what later became CAMPFIRE. CASS continues to be a member of the CCG.

CASS stated its mission in 1994: "To serve as a multi-disciplinary applied social sciences department, providing high level graduate and policy relevant teaching and research."

CASS core staff positions include one professorship, four lectureships, and one research fellowship. It also has five research fellowships funded by the NRMP II.

CASS's NRMP II budget is Z$10,316,240 (through August 1999). CASS had spent Z$3,892,986 (38%) through January 1998. The trend in underspending its budget appears to be reversing; recent CASS involvement has seen an acceleration in spending rates. The spending rate is likely to increase because CASS has initiated an effort to contract out a larger portion of the work specified under its CCG obligation. Informal budget projections at a recent PET quarterly review meeting suggest that all grant funds will be exhausted at term.

Conclusions

CASS has been responsible for supporting NRMP II and CAMPFIRE with a tremendous amount of applied field research. It has documented this work and given it wide distribution among partner institutions. It deserves much credit for the success of CAMPFIRE within Zimbabwe.

CASS has a track record of doing serious and useful policy analysis in support of CAMPFIRE.

CASS needs to bolster its staff if it is once again to play an effective role in CAMPFIRE.

Institutionally, CASS is passing through a period of low morale, but would like to enter more into policy areas of study, and to do less in the applied, field-oriented advising it has been asked to do in the past (a reflection of current personnel skills and interests).

CASS, as a university-based program, continues to be an important (potential) partner to the program, and ways to support personnel should be found.

Recommendations

CASS should continue to play an active role in CAMPFIRE in the areas of policy analysis and applied research. It should be encouraged to develop its policy dialogue skills so its analysis may better contribute to policy decision-making. Specifically, CASS should: (1) write policy briefs that summarize major findings and recommendations; (2) seek to expand the form in which studies are presented so that they are accessible to sub-national audiences, e.g., it might work with Action magazine to put some policy-related studies in an animated strip format in the magazine and other educational materials; and (3) seize opportunities to make its work known through popular media, public speeches, and participation in CAMPFIRE meetings, workshops, and training.

CASS must be tasked with a studies mandate that allows it to determine timing and the precise content of studies internally. The CCG should help define the subject areas and scope of inquiry, such as tenure policy, eco-tourism, impact of natural resource policies, or other areas determined.

USAID, through the IC grant or through the CDF, should strengthen CASS's efforts by:

- Providing block grants to principal investigators in the key subject areas identified in this report (policy harmonization and local resource governance, woodland policy management and tenure, and the nature of community commitment to CAMPFIRE); and

- Revising CASS agreement.

V. LOOKING AHEAD: STRATEGIC PLANNING AND CAMPFIRE SUSTAINABILITY

A. Graduation Scenarios

Current CAMPFIRE NRMP II support is scheduled to end in September 2000. The Mission has requested an extension through FY2002, which would move the project completion date to September 2003. The evaluation team considered several broad options to guide Mission support for CAMPFIRE under each timeframe. The team's reflections are summarized in the scenarios presented below.

The evaluation team favors the longer term phaseout of USAID support, as proposed in the FY2002-A scenario. As is argued in the body of the report, it contains the most progressive and responsive means of achieving results *and* closing down support. More specifically, it will:

- Enable a consolidation of progress in institutionalizing the CAMPFIRE principles;
- Establish momentum for the push for CAMPFIRE diversification into a wider range of resource use and revenue sources; and
- Help establish a favorable policy environment and other enabling conditions for long-term program sustainability.

The team recognizes that there are other ways to pursue the above objectives, and the range of options encourages broad CCG and BRC debate over program modifications for the remaining CAMPFIRE support under NRMP II.

1. Scenarios Assuming Graduation in FY2000

Scenario FY 2000-A: Closeout with Modifications to the Existing Implementation Framework

Under this scenario, USAID would support existing grants under the IC through their current August 1999 termination dates, after which they would receive a one-year extension at 50% funding levels. They would be encouraged to complement NRMP II grant funds with other funding to complete their CCG commitments. Support for new NRMP II partners and a renewed grant to the ZimTrust would be structured similarly. Support for government partners would be drawn directly from the USAID budget as per approved activity proposals. USAID, in collaboration with the BRC, would eliminate the PET. This action is a step toward Mission graduation and recognizes the CA's enhanced capacity. Both the reduction in direct core support to grantees and the elimination of the PET represent a gradual and phased withdrawal of NRMP structures from within the CCG. The level of the NGO match could be adjusted by institution if circumstances warranted. USAID and the BRC would work through the IC to transform the CDF into an autonomous "sinking" grant fund that would gradually disperse funds through and beyond the PACD. When the monies have expired, the funding mechanism would cease to exist. The fund would support continued CAMPFIRE activities by the CA

Scenario FY2002-B: Extension Through FY2002 Under the Existing System of Sub-grants

This scenario is essentially an extension of Scenario FY2000-B. Existing project structures would be maintained. Additional funds would permit efforts to diversify CAMPFIRE NRM activities, especially into ecotourism and woodland management. Policy change and policy initiatives could be made a greater priority. The NRMP II could be used to enhance the GOZ/CAMPFIRE aim of comprehensive habitat monitoring to complement the widely praised wildlife monitoring functions. The greatest number of the incremental recommendations made in this report could be implemented under this scenario. The PET could be phased out prior to the PACD but less abruptly than under the FY2000 scenarios. With careful planning, the impact of the NRMP II closeout could be reduced.

Scenario FY2002-C: Extension with No Additional Funding

This scenario is a second-choice one but is still preferable to the presently approved FY2000 closeout. Activities and budgets could be wound down more slowly. There would be no impetus to spend funds rapidly. Rather, the challenge would be to use them even more parsimoniously than at present. Results would suffer, however. Diversification to other CBNRM regimes that employ participatory methodologies, land-use plans, and the same start-up incentives and post-project activities with new CCG partners would be limited to options outside the control of NRMP II in the post-graduation context. Activities would be triaged, and some activities would be curtailed or dropped.

B. Sustainability of CAMPFIRE

1. Extending and Improving the CAMPFIRE Development Fund

Given the start-up delays with the NRMP II and additional distractions brought on by the international CITES debate, progress on NRMP II-funded activities has understandably been slower than expected. Design flaws, which could be easily remedied, in the CDF compounded this slowness. The CCG group, which has spent years -- with USAID encouragement -- building capacity to implement sustainable use principles, merits continued support.

Bringing in three new CCG members and extending the project by a year will also draw down funds. The exact amount remains to be seen. However, the absorptive capacity of SAFIRE, the DNR, and the FC is limited. In addition, it is unlikely that "pushing" funds through the CDF at an excessive rate will result in institution-building or successful in CBNRM activities in the field.

For these reasons, this section concentrates on exploring the option of capitalizing the remaining available program funds. Capitalization would have the advantage of slowing the rate of spending to one that could be matched with local absorptive capacity. High quality field results even without large supportive project structures would continue to be possible.

The purpose of capitalization would be to establish a sustainable financing mechanism that continues to provide small-scale support for activities that are consistent with NRMP II goals and the

Contract for an in-depth review of the capitalization concept to investigate the possibility in depth, explore the wording of a trust agreement, and review potential partners and options for a local grant-making intermediary that would work in-country after USAID departure until the grant funds were spent.

C. Strategic Plan Review -- USAID Results Framework

Evaluation Issue: SO1 Performance Monitoring Plan *"To what extent these SO-level indicators and targets are appropriate, i.e., can they be appropriately measured and monitored for SO 1 performance purposes ?" "Are they realistic for the specified time frames and resource levels?" "What changes might the team recommend in these indicators and targets for improved measurement and monitoring of SO achievement and sustainability?" (4.D.e)*

Findings

In June 1995, USAID/Z developed a Plan of Operations for Phase II that included objectively verifiable, quantifiable indicators, including targets and timeframes, to measure project outputs. Under Phase II of the project, each of the implementing partners (e.g., the ZimTrust, WWF, CASS, ACTION, ART, PET, and The DNPWLM) is responsible for one of the eight planned outputs that will be measured to determine the achievement of project purposes (Audit, 1995).

The 1995 audit reported that USAID/Z needs better indicators for measuring results (Audit, 1995), and the Mission progressively worked on its indicator set. IUCN-ROSA facilitated the SO redesign effort, leading to the current set of indicators and performance monitoring and measurement tables and data collection plan. "Virtual SO team members" in USAID/W/AFR /SD/PSGE also provided assistance. The Mission relies on CCG partners, which generate a more extensive information base for their own and the Programme's M&E needs. The SO1 indicators attempt to isolate critical measures that meet the needs of the USAID Mission and overall Agency requirements for strategic performance monitoring and measurement. Over the course of the project, changes at all levels (shift from a food security to NRM objective, reengineering and redesign of NRMP II as SO1, shift from household to community focus, etc.) have affected what should or even could be measured by the CCG (i.e., addition of new partners and enhanced capacity of existing partners, etc). The existing framework reflects this evolving context and the capacities of the CCG partners systems.

USAID and its implementing partners spent a great deal of time and effort discussing, developing, and then implementing the current Performance Monitoring Plan for SO1. The reasoning and causal linkages established between "performance-based, process indicators," which are "to measure results rather than outputs" at various levels, is theoretically sound. It is, nonetheless, removed from on-the-ground complexity and "real-life" ability to measure. CAMPFIRE, a complex program, is process-orientated, and the indicators developed may be difficult to measure objectively. An example is the ambiguity as to what constitutes a community. In the R4, a "CAMPFIRE community" is defined to include people at the village, ward, *and district* levels. CAMPFIRE implementation and principles are, however, based on benefits to "producer communities" -- households at the village level.

Attention to spatial aspects in CAMPFIRE's M&E system is limited. Monitoring of habitat loss, particularly in the wildlife-rich Rural Districts and wards, is very weak. This gap is particularly surprising given the financial resources at the disposal of CAMPFIRE over the past eight years. Without an objective basis for characterizing, describing, and quantifying the increasing fragmentation of habitat and the growth of scattered population centers within former wildlife habitats, it is difficult to interpret and respond to this important demographic challenge to CAMPFIRE. Simply monitoring population growth, without knowing where people are settling, does not address the problem adequately.

Conclusions

Performance monitoring and evaluation have been weak components of the NRMP I and II, for reasons that are usually beyond the means of project personnel to improve significantly. No one wants the cost of monitoring to exceed the costs of the activity being monitored. It already takes a great deal of project personnel's time, and it should not be increased. Simplification would be preferable.

Performance monitoring and evaluation in NRMP II could have been better coordinated with the CA as the lead agency. There has been inadequate focus on the verification of results in attempting to implement CAMPFIRE principles. Since the SO1 was redesigned, there is a closer association between what is proposed for measurement and what is being carried out on the ground.

NRMP II performance "process" monitoring may not have exploited the rich database resources to the extent possible, preferring simply to create a new set of indicators, many of which would appear difficult to acquire or interpret.

A fresh look at existing data might be considered. For example, the benefits of CAMPFIRE dividends in real terms, when compared with inflation, might be pointed out more clearly. While the value in Zimbabwe dollars of a cow or kilogram of corn to rural farmers has declined over the years, the value of the hard currency they get from wildlife management, as well as other NRM options (exported honey and tourism), has remained constant, if not increased. The Zimbabwean dollar has lost 50% of its value since the beginning of the NRMP II, but the hard currency values of natural resource products have remained the same or risen.

The case for rural communities *without* wildlife dividend benefits is not clearly shown. One way to catch diversification in revenue generation (SO1E), a key goal for the NRMP II, particularly in these closing years of USAID support to the Programme, would be to take total non-sport hunting income as a percentage of total CAMPFIRE NRM revenue (that figure could include income-producing activities flowing from the initial wildlife revenue, as in case of the revenue from grinding mills or leather crafts) (see Tables 6 and 7). Yet, obtaining and aggregating the data needed for this proposed indicator will be extremely difficult. CAMPFIRE benefits to rural communities are very substantial, and their impact is not captured through the indicators presented.

The formal indicator reporting needs to be supplemented with case study material. This approach is already being applied but can be taken a step further by reinterpretation and "ground truthing" of the in-depth studies by CASS and other CCG members. This information could contribute to the "adaptive management model" that CAMPFIRE employs.

The source and data quality analysis that accompanies SO indicator measurement should be improved. USAID/Z should also improve the justification for each of its project result indicators.

There need to be several sets of spatial habitat monitoring data. Efforts should be initiated to improve the monitoring of habitat loss, beginning with the most important wildlife Rural Districts. A baseline for key aggregate land-use classes (e.g., bush cover, new agricultural land, old agricultural land, human settlements, roads, and bodies of water) could be established for approximately the last 10 years, using Landsat images for the 1970s, for example. A second set could be established for the period 1988-1991, when CAMPFIRE began. Finally, a third period, the most recent coverage possible -- 1997/1998 -- should be completed. Annual, low-cost, videographic monitoring could be initiated in high-risk but valuable areas, and the data superimposed on the earlier geographically referenced maps. Finally, these spatial data could be integrated with information concerning safari zones of operation and correlated with wildlife quotas and revenues being generated. It seems the WWF is currently the best positioned to support such an effort. The additional cost of this effort would certainly be justified, given the current total absence of such information for Zimbabwe's most significant natural resource: its wildlife. Such information is also critical to establishing meaningful NRM plans for the concerned wards and Rural Districts. Given sufficient time and funding, these efforts should be extended to other Rural Districts where forests (without wildlife) are the resources, as they are critically important to the future economic options of the local population. Had such spatial monitoring resources been available for at least CAMPFIRE's wildlife-rich Rural Districts, NRMP II could have objectively measured reduced habitat loss as an indicator of the success of the Programme and of CAMPFIRE's overall philosophy.

Table 14: FY 2000-A Graduation Scenario

Recipient	Remaining Total	Amount Projected to FY 2000 @ 100%	Annual Rate	March 1 - Sept 30, 1998	100% for FY 1999	50% for FY 2000	Total Budget	Balance to New Partners or CDF
CDF	5,363,370		425,000	400,000	425,000	425,000	1,250,000	4,113,370
DA/PW	1,638,636	2,035,446	814,178	407,089	814,178	814,178	2,035,445	-396,809
DNPWLM	1,439,236		100,000	50,000	100,000	50,000	200,000	1,239,236
MLGRUD	200,000		100,000	50,000	100,000	50,000	200,000	0
CA	897,645	993,750	397,500	198,750	397,000	198,750	794,500	103,145
Zimtrust	664,651		600,000	300,000	600,000	300,000	1,200,000	-535,349
WWF	1,154,917	1,058,333	523,000	261,500	523,000	261,500	1,046,000	108,917
CASS	653,990	662,500	265,000	132,500	265,000	132,500	530,000	123,990
SAFIRE	0		200,000	100,000	150,000	100,000	350,000	-350,000
Forestry C.	0		200,000	100,000	150,000	100,000	350,000	-350,000
DNR	0		100,000	75,000	75,000	50,000	200,000	-200,000
USAID	23,959	250,000	250,000	125,000	250,000	250,000	625,000	-601,041
Totals	12,036,404	5000029	3974678	1,987,339	3849178	2731928	8,568,445	3,255,459

DA, USAID, and the CDF are not subject to % reductions.

CDF will begin FY2001 with about $3,255,459 (plus any amount unspent in previous years).

It is important that USAID allocate monies annually in US$ currency as required;

otherwise 20%+ inflation will change all projections and diminish significantly program impact.

FY2000 Graduation Scenario	
Current funds	12,036,404
Required to 9/30/2000	8,568,445
CDF Fund	3,255,459

Table 14b: Future Scenario 2002-A (modified)

Recipient	Remaining Total	Amount Projected to FY 2000 @ 100%	Annual Rate	March 1 - Sept 30, 1998	75% for FY 1999	50% for FY 2000	Total Budget	Balance to New Partners or CDF	Amount Needed to September 2002	Balance After FY 2002
CDF	5,363,370		425,000	400,000	425,000	425,000	1,250,000	4,113,370	850,000	4,166,667
DA/PW	1,638,636	2,035,446	814,178	407,089	814,178	814,178	2,035,445	-396,809	1628356	0
DNPWLM	1,439,236		100,000	50,000	75,000	50,000	175,000	1,264,236		0
MLGRUD	200,000		100,000	50,000	75,000	50,000	175,000	25,000		0
CA	897,645	993,750	397,500	198,750	298,125	198,750	695,625	202,020	596250	0
Zimtrust	664,651		600,000	300,000	450,000	300,000	1,050,000	-385,349	0	0
WWF	1,154,917	1,058,333	523,000	261,500	392,250	261,500	915,250	239,667	0	0
CASS	653,990	662,500	265,000	132,500	198,750	132,500	463,750	190,240	0	0
SAFIRE	0		200,000	100,000	150,000	100,000	350,000	-350,000	0	0
Forestry C.	0		200,000	100,000	150,000	100,000	350,000	-350,000		0
DNR	0		100,000	75,000	75,000	50,000	200,000	-200,000		0
USAID	23,959	250,000	250,000	125,000	250,000	250,000	625,000	-601,041	850,000	0
Totals	12,036,404	5000029	3974678	1,987,339	3353303	2731928	8,072,570	3,751,334	3924606	0
									4,502,439	

DA, USAID, and the CDF are not subject to % reductions.
CDF will begin FY2002 with about $5,016,667 (plus any amount unspent in previous years).
It is important that USAID keep money allocated per year in US dollar currency until when needed; otherwise 20%+ inflation will change all projections and diminish significantly program impact.

NRMP Graduation Scenario

CDF	5,016,667
DA/PW	1,628,356
CA	596250
USAID	850,000
Total	8,091,273
Left	3,751,334
Need	4,339,939

VI. NRMP II LESSONS LEARNED

A. Planning for Public Scrutiny

More than ever it is becoming important to screen and design development projects against a filter of potential debilitating controversy. Modern communications technology, including the Internet, mean that activist participation can be very focused and rapidly mobilized. Foreign assistance activities that operate in remote, as well as culturally and politically distinct, circumstances are particularly susceptible to US interest group pressures. CAMPFIRE's controversial acceptance of sport hunting of elephants as a means of furthering conservation-based community development proved to be a lightening rod for controversy. The impetus might just as easily come, however, from support for divisive health or population issues and practices, for out-of-favor crop or forestry activities, for financing for ever-unpopular massive infrastructure projects, or for decisions to operate in disputable geographic locations. "Hot" issues backed by a concerted campaign can have the immediate impact of halting (for better or worse) longstanding and ongoing development efforts. This civil society oversight can be healthy, but it should be considered at the planning stage. This is particularly important with overseas development activities, because domestic standards and international program standards of acceptability are not necessarily the same. Oftentimes the opposition is not domestic, not well-organized, and/or not popular with decisionmakers. CAMPFIRE has been able to survive, but the effort to ensure its survival may provide lessons for what may become a more characteristic level of public involvement in specific development assistance activities.

B. The Legitimacy of Non-Governmental Organizations

CAMPFIRE's experience reaffirms the validity and utility of involving NGOs as important actors in the development process. In the early 1980s, it was considered a major breakthrough to have NGO participation at an international meeting on NRM in the Sahel. The so-called "Bamako process" was launched under the umbrella of an intergovernmental advisory commission and has become something of a benchmark for NGO involvement toward institutionalizing local participation in NRM programs. The 1991 Rio "Earth Summit" was a landmark for establishing and formalizing an NGO place at international fora. CAMPFIRE, mainly through the CA and ART at the international level, and through all the CCG NGOs at the operational level, confirms the value and need for NGOs to carry forth mandates from a specific program level. The Programme further underscores the point that NGO legitimacy is not a given, but is based on specific comparative strengths in serving and responding to local people and their community-based organizations.

C. The Need for Strong Partnerships

One of CAMPFIRE's most impressive accomplishments is to demonstrate the value of strong partnerships. The extent and depth of local commitment and ownership of the Programme enable it to see beyond and overcome the many hurdles and institutional limitations that have thus far presented themselves. CAMPFIRE is a microcosm embodying the complex dynamics of ecology, politics, and race, of central control and decentralized autonomy, of state structures, NGOs, and

"Where are we going and how will we know when we get there?" The lesson from CAMPFIRE is that application of adaptive management redefines the question as, "Where are we going, and how will we know when we are off track?"

A clear vision of where a program is heading is vital if the implementation approach permits substantial and frequent modifications. The force of vision projected in CAMPFIRE's strong and clearly stated principles has served as a backdrop and yardstick for the Programme's application of adaptive management practices. Protecting nature is not like constructing a building, and thus, as CAMPFIRE's experience shows, does not require a detailed blueprint. CAMPFIRE's conservation objectives are permanent, and meeting them is an ongoing effort. What is remarkable and instructive about the Programme are the importance and constancy of the underlying CAMPFIRE principles as guideposts in making constant programmatic adjustments.

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FINAL REPORT
Appendicies

Mid-Term Evaluation
of the
Zimbabwe Natural Resources Management Project, Phase II
(USAID/Zimbabwe Strategic Objective No. 1)

Contract #AEP-0085-I-00-6021-00

Communal Areas Management Programme
for Indigenous Resources, CAMPFIRE

Submitted to:
USAID/Zimbabwe

Submitted by:
The Mitchell Group, Inc.
18161 11th Street, NW
Washington, DC 20001
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July 31, 1998

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APPENDIX A

LIST OF PERSONS CONTACTED

List of Persons Contacted

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World Wildlife Fund
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Teresa M Telecky, Director Wildlife Trade Program
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IUCN (World Conservation Union)
Steve Edwards, Director Sustainable Use Initiative

Other
Valerie de Liederkerke, Elephant specialist, National Commission for the Environment
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Assif Shaik, President IRG (phone)

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Campfire Association
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Prisca Huchi-Odera, Monitoring Evaluation and Gender Officer.
Steven Kasere, Deputy Director Project.
Felicity Spain, Financial Manager.
Tawona Tavengwa, Information Officer.
Jerry Gotora, Chairman UMP Zvataida RDC/Vice Chairman
Ngoni Wasarirevhu, Deputy Director(Finance and Administration)
Tom Bepura, Project Development Officer.

NRMPII Institutional Contractor (DA)
Ed Butler, Chief of Party.
Oliver Chapeyama, Program Manager
N. Wasarirevhu, Director (Financial and Administration)

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Ivan Bond, Economic Advisor, Program Officer
Dr. Russell Taylor, Program Manager
Dr. Ed Wilson, Director, Int'l
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Dr. Jon Hutton, Director
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Mafumgautsi Forest Project
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Gwenungu Dam
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J. Jahana, Chief
C. Bhophe, Campfire Chairperson

Beitbridge District
A. Maboyi, CEO
S.Modeme, Campfire Coordinator
Mr Muleya, Campfire Unit Coordinator
Campfire Information Officer
D.J. Maphala, Zimtrust Officer
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Mr. Manyelenga, Resource Manager
Mr. Ndou, Maramani Wildlife Monitor

Chiredzi District
E. Chauke, Campfire Coordinator
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Jameson Malunguza, Campfire Resource Monitor

Chipinge District
Charles Inggs, RDC CEO

Mahenye Ward Committee

Bulilama-Mangwe District
Christopher Ndhlovu. RDC CEO
Lizwelethu Tshumm, CAMPFIRE Manager
Thandie Chikomo, ZimTrust area manager

Tsholotsho District
J.D.M. Nyoni, RDC CEO
K.M. Tshuma, CAMPFIRE Manager

APPENDIX B

SCOPE OF WORK

STATEMENT OF WORK

Mid-Term Evaluation of the Zimbabwe Natural Resources Management Project, Phase II (USAID/Zimbabwe Strategic Objective No. 1)

I. Title

Mid-Term Evaluation Report: Zimbabwe Natural Resources Management Project, Phase II-USAID/Zimbabwe Strategic Objective No. 1.

II. Purpose Statement

Short-term technical assistance services by a multi-disciplinary team of experts are required to conduct a Mid-Term Evaluation of the Natural Resources Management Project, Phase II (NRMP II)[1], more recently redesigned as USAID/Zimbabwe's Strategic Objective No. 1 (SO 1). The evaluation should begin in January 1998 and end no later than March 31, 1998.

Specific evaluation objectives include: (1) assess NRMP II responsiveness to the findings and recommendations of the last Project evaluation; (2) document USAID-funded contributions to CAMPFIRE to date, i.e., what has USAID "bought" with its support; (3) assess the performance of each of the implementing partners in fulfilling their respective roles and responsibilities under NRMP II; (4) document results and impacts achieved to date from this assistance; (5) address certain key policy, planning, management and implementation issues; and (6) recommend revised implementation approaches and arrangements for improving NRMP II achievement and impact, and the prospects for the long-term sustainability of CAMPFIRE as NRMP II progresses toward its final stages of implementation and closeout. The product of these services will be a Mid-Term Evaluation Report for NRMP II/SO1.

III. Background Information

USAID has, since 1989, been providing financial support to CAMPFIRE under the Southern Africa Regional Program's (SARP), now the Initiative for Southern Africa (ISA) Natural Resources Management Project (690-0251.13), commonly referred to as NRMP I. USAID/Zimbabwe's involvement in NRMP I was originally conceived as a pilot effort focusing on four districts in Matabeleland. NRMP II (613-0241) was initiated in September 1994 with a USAID contribution of US$ 20.5 million (including $16 million in bilateral

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[1] The terms NRMP II or Project are used herein to distinguish USAID-funded support to CAMPFIRE from the greater CAMPFIRE Programme or movement (which also receives assistance from several other donors as well). In section IV.D. ("Future Strategic Planning Issues/Questions"), this terminology changes, with USAID's future assistance to CAMPFIRE referred to as Strategic Objective No. 1 (SO 1), in agreement with the recently approved re-design of this program in accordance with USAID's reengineered operating systems and procedures.

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of NRMP II's design, implementation progress and success in achieving its stated sustainable conservation-based community development objectives. In addition to in-country evaluation activities, selected team members will also be required to visit Washington, D.C. and Gaborone, Botswana in order gather information from knowledgeable sources regarding NRMP II's regional and international operations and impact. While extensive interviews will be required of a variety of different stakeholders, the team will be expected to rely, to the maximum extent possible, on existing written and oral information on NRMP II and CAMPFIRE. Therefore, it is not anticipated that any major formal surveys or other primary data collection activities will be required to complete this work. The results of this work will be presented in an evaluation report for consideration and use by concerned U.S.G., GoZ, Non-Governmental (NGO) and community stakeholders. The final methodological details of this Scope of Work (e.g., including team composition; timing, staffing and levels of effort of individual team members; and specific assessment techniques) will be determined by the selected firm through a limited competitive selection process for this work.

The more specific questions and issues to be addressed are described in the following sections of this Scope of Work (SOW). These questions and issues are organized around the following major evaluation topics: (a) follow-up questions from the major findings and recommendations from the last Project evaluation; (b) current salient questions and issues regarding both the greater CAMPFIRE Programme and NRMP II assistance to that Programme; (c) certain management issues and questions arising from the controversy surrounding ongoing U.S.G. assistance to this Programme; and (d) recommendations regarding future strategic directions for ongoing NRMP II support to CAMPFIRE in preparation for the planned SO and Mission graduation and closeout.

In completing this SOW, the contractor shall address the following specific questions and issues and perform the following tasks:

A. 1994 NRM Project (Phase I) Evaluation Questions/Issues

The following are the major findings and recommendations, together with pertinent follow-up questions/issues, from the last evaluation conducted on NRMP I by ULG Consultants Ltd. in January 1994:

1. Finding/Conclusion: The Project is providing meaningful benefits to communal residents in the Project area.

Recommendation: No specific recommendation.

Follow-Up Questions/Issues: To what extent is NRMP II (and CAMPFIRE, in general) continuing to provide meaningful benefits to participating communities? What, if anything, should to be done to augment NRMP II (and CAMPFIRE) benefits to and impacts on producer communities?

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CAMPFIRE implemented policies and procedures to properly review the technical feasibility of proposed infrastructure development activities? What, if anything, should be done to further promote the sound design and implementation of infrastructure development activities?

5. Finding/Conclusion: In general, the success of the NRMP II and CAMPFIRE, owes a lot to the commitment, talent and tenacity of certain key project implementors and participants.

Recommendation: No specific recommendation.

Follow-Up Questions/Issues: To what extent are the NRMP II and CAMPFIRE still driven by key personalities (vs. a more organizationally-driven implementation approach)? To what extent does the commitment, talent and tenacity of certain actors continue to impact positively or negatively on the direction and evolution of the Project and Programme?

6. Finding/Conclusion: Some implementation problems have been attributed to what is perceived as USAID's inflexible, heavy-handed approach to activity planning, implementation and management.

Recommendation: The Project's implementation committee needs overhauling, and USAID's role in implementation approval/decision-making needs to be reconsidered. USAID needs to be more sympathetic to the needs and requirements of small, local NGOs.

Follow-Up Questions/Issues: To what extent has USAID adopted managerial changes which make it more flexible in its dealings with its local NGO partners? Discuss the role and impact of the project Institutional Contractor in this regard. To what extent does USAID's relationship with its NGO partners cause problems in ownership, defining the roles/responsibilities of the various implementing agents and in determining future directions for CAMPFIRE? What, if anything, should be done to improve relationships among all Project partners (expanded team members) in the future?

7. Finding/Conclusion: The focus on Rural District Councils (RDCs) gives the NRMP II and CAMPFIRE a top-down planning/implementation orientation, i.e., activities are not usually initiated as a response to problems identified by individuals, or groups of individuals, at village-level. As a consequence, some communities mistrust the Project and Programme. Moreover, because NRMP II/CAMPFIRE activities are identified, planned and implemented at the district-level, and financial decisions are made at that level, benefits are perceived as being controlled by district-level officials. This has served, in some areas, to undermine community-level commitment to CAMPFIRE.

Recommendation: Control over NRMP II/CAMPFIRE

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Parks and Wildlife Management, originally a founding and leading member of the CAMPFIRE Collaborative Group (CCG), and a strong CAMPFIRE proponent, appears to have become less involved with the Programme. To what extent has DNPWLM's participation in CAMPFIRE changed over time? What are the consequences of this change for CAMPFIRE and the NRMP II?

How has this change affected CAMPFIRE's relationship with, and perception by, central Government? To what extent have other GOZ departments/actors become involved in Programme and Project decision-making? To what extent has CAMPFIRE been institutionalized within the GOZ's development policy framework? What has the NRMP II done to strengthen relations and improve communications with concerned central Government agencies and decision-makers? What, if anything, needs to be done to promote continued/improved communications/relations with concerned central GoZ authorities and decision-makers? What, if anything, should be done to promote continued/improved central GoZ involvement in Programme and Project implementation, both generally and as it diversifies into other resource areas?

B. Current CAMPFIRE Questions/Issues

1. Development Hypotheses:

a. CAMPFIRE theory proposes that authority for NRM should be devolved to the "most appropriate level of authority". Is the current **level of devolution of authority** appropriate for the resources being managed under CAMPFIRE? Does the current focus on Rural District Councils (RDCs) as "Appropriate Authorities" limit the achievement of CAMPFIRE's community development objectives? Does it limit CAMPFIRE's movement into community-based management of other, non-wildlife, indigenous resources? Review, assess and discuss realistic alternatives to CAMPFIRE's current devolutionary approach towards CBNRM, using examples, where appropriate, from other similar programs.

b. CAMPFIRE currently focuses on a limited set of indigenous natural resources (mainly renewable wildlife resources). Does the Programme have breadth/depth to include the management of other natural resources and/or **indigenous cultural resources**, such as traditional folklore, arts/crafts, cultural practices, special archeological or cultural sites, etc., under its umbrella?

c. What is the most environmentally, economically and culturally **appropriate land-use strategy(s)** among CAMPFIRE's RDC members? Discuss the primary factors supporting this conclusion.

2. CAMPFIRE Implementation: The contractor shall:

a. Define **the current scope of the CAMPFIRE Programme** or movement (i.e., numbers of participating districts, wards, people; geographic extent of operations; technical area(s) of

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a. The NRMP II design included nine key assumptions (see p. 9 of the Project Paper supplement of September 1994) which needed to remain valid for the NRMP II to successfully achieve its stated objectives. To what extent have these assumptions remained valid? The design also noted several external risks, beyond the manageable interest of the Project, such as the evolution of international conventions on elephant and ivory trade, severe drought, regional political or economic unrest, and international trends in tourism, which could significantly affect the achievement of its objectives. To what extent have these (or other) external factors affected Project (and Programme) implementation and achievements? Discuss recommendations for dealing with these factors in the future?

b. As noted above, following adaptive management principles, the NRMP II has adopted a flexible design approach, involving annual planning, followed by quarterly review/planning workshops. To what extent has this design approach allowed implementors to adjust their plans/budgets to meet changing circumstances? To what extent has this approach allowed implementors to learn from their experiences, and incorporate the lessons learned within future work plans? To what extent have planning/review requirements detracted from management efficiency and/or on-the-ground implementation activities? What, if anything, should be done to improve future implementation planning?

c. The NRMP II's Economic Analysis projected significant increases in CAMPFIRE revenues from non-consumptive resource utilization schemes, particularly wildlife-based eco-tourism. To what extent have these projected increases materialized? What are the real prospects for expanding CAMPFIRE beyond its current focus on the consumptive utilization of wildlife (i.e., especially large mammals) within the NRMP II's existing timeframe? What strategic, financial or other modifications to the existing Project would be required to achieve this Programme diversification objective? What, if any, additional financial or other support would be required in this interest, and how might it be put to the most effective use? [See also Future Strategic Planning in Section IV.D. below.]

3. NRMP II Implementation Issues:

a. The CAMPFIRE Development Fund

Instituted in mid-1995, the CAMPFIRE Development Fund (CDF) is a core Project element. The CDF provides financial assistance, in the form of grants, to support the development of district and sub-district level CAMPFIRE institutions and natural resources management infrastructure.

Due to a variety of factors, CDF implementation has lagged behind initial plans, jeopardizing the achievement of maximum Project and Programme results and impacts. What, if any, actions should be taken to provide for more rapid disbursement of CDF grants to support community capacity-building and infrastructure activities in the future, without sacrificing quality and impact?

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advocacy, etc.? What has been the impact to date of this collective work? How do these results compare with the Project's design targets and objectives? What, if anything, should be done to improve individual partners' implementation performance in the future? What, if anything, should be done to improve NRMP II's progress in achieving its stated results and objectives?

How effective have implementing partners been in instilling a sense of Programme ownership among participating RDCs? To what extent are the implementing partners' work plans responsive to beneficiaries' demands for services? To what extent has an effective Customer Service Plan been put in place to monitor RDC clients' level of satisfaction with the services being provided to them by each of the various implementing partners? What, if anything, should be done to promote improved responsiveness and accountability to RDC and community customers?

How effective have implementing partners been in communicating the results of their research/investigations to participating RDCs? What, if anything, should be done to improve the partners' communications with their RDC clients in the future?

4. NRMP II Management Issues:

During the run-up to this year's 10th Conference of the Parties (COP 10) to the Convention on International Trade in Flora and Fauna (CITES) in Harare, the NRMP II and CAMPFIRE came under intense attack from a variety of animal welfare groups opposed to trophy hunting of wildlife, particularly elephants, and the resumption of the trade in elephant ivory. This opposition has resulted in extended debate in the U.S. Congress regarding the relative merits and liabilities of continuing U.S. Government support to CAMPFIRE.

The contractor shall address the following questions and issues emanating from this debate:

a. To what extent, if any, is the NRMP II supporting or promoting **trophy hunting**, particularly, but not exclusively, of elephants, in Zimbabwe (directly or indirectly)? To what extent, if any, has the Project facilitated, fostered or encouraged, the growth and development of legal wildlife offtake (i.e., commercial sport hunting, subsistence hunting, cropping) on communal lands? To what extent, if any, has the Project discouraged, reduced or stopped the illegal offtake (i.e., poaching) of wildlife on communal lands? What has been the impact of Project activities on the status of wildlife in participating communal areas? Is wildlife management the most environmentally, economically and culturally appropriate land-use among CAMPFIRE's RDC constituents?

b. To what extent have NRMP II funds been used for "**lobbying**"[3], regionally,

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[3] The term "lobbying", as used here, relates to host country, regional and international advocacy activities. It does not/not include formal U.S.G. lobbying as prohibited under Office of Management and Budget Circular 122A (as revised). Therefore, the team is not being asked to make any judgement regarding the legality of the various activities

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existing strategic framework, there has been little guidance on preferred strategic approaches for pursuing these worthwhile objectives.

Similarly, Office of Management and Budget (OMB) Circular 122A (as revised) provides detailed guidance on restrictions against the use of U.S.G. funds for lobbying U.S. officials and legislators on domestic U.S. legislation. However, there is little or no clear guidance on the use of such funds for regional and international advocacy activities (i.e., addressing regional or international topics outside of the U.S. with non-American officials and counterparts), such as that under consideration here for CITES and other international treaties or conventions.

In view of the above, and based upon the team's above findings in each of these three critical policy areas, including importantly the results of its USAID/W consultations, the contractor shall articulate current USAID policy on these important strategic topics. In the team's opinion, is USAID's approach to these policy areas appropriate for the current international environmental management context? Is this approach appropriate for the current international developmental context? Has this approach been sufficiently well defined, articulated and communicated to properly guide specific country program achievement? What, if any, recommendations might the team have regarding Agency policy in these areas? What, if any, recommendations might the team have regarding the application of this policy in this instance?

D. Future Strategic Planning Questions/Issues

a. As described in section IV.C. 2. above, the NRMP II's adaptive management approach towards implementation calls for a rolling approach towards Project design. This rolling design approach specifically includes provision for the periodic review of implementation, with adjustments in design and/or resource allocations depending upon the performance of the various implementing partners and design components. In this interest, the contractor shall review NRMP II implementation performance to date and provide recommendations for any modifications, including any associated reallocations of existing Project resources, which may be required to improve future performance and otherwise enhance the achievement and sustainability of its results within the remaining two years of implementation under the existing FY 2000 graduation scenario.

b. In accordance with USAID's reengineered operating principles and procedures, the Mission has recently completed a new draft **Results Framework (RF)** for Strategic Objective No. 1 (SO 1) which delineates USAID's strategy for ongoing assistance to CAMPFIRE through the end of FY 2000 (i.e., the current SO 1 graduation date). The contractor shall carefully review this document, both internally and with concerned USAID and partner representatives, to determine its appropriateness for the successful achievement of SO 1's stated objectives. More specifically, the contractor shall assess the appropriateness of all of the draft RF components (i.e., rationale, development hypothesis, results framework, results packages, and performance monitoring and customer service plans)? What modifications, if

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draft and final reports which will include detailed findings, recommendations, lessons learned and other salient results of the analysis specified in the above SOW. The draft report will be submitted to the COTR, USAID/Zimbabwe and concerned GoZ agencies (i.e., MMET, MoF, MLG&PH) and CCG organizations no later than March 1, 1998 for review, discussion and comment prior to finalization. The team will hold individual or joint debriefing session(s) with concerned USAID, GoZ and CCG personnel approximately two weeks following draft report submittal to discuss the report's findings and recommendations and facilitate the review and comment process.

The contractor shall submit the final evaluation report no later than March 31, 1998. Thirty-five (35) bound copies of the final report should be submitted to the COTR, USAID/Zimbabwe, who will assume responsibility for subsequent transmittal to other concerned agencies, together with an electronic copy of the final report in WordPerfect format for subsequent printing, dissemination and use. The Contents of the Final Evaluation Report are included as Annex 1 to this Statement of Work.

VI. Team Composition and Qualifications

The evaluation will require a multi-disciplinary team of experts over the three month period January-March 1998. Final team composition, and the timing and level of effort of individual team members, will be determined by the selected firm through a limited competitive selection process for this work.

Suggested key team disciplines include environmental/natural resources (E/NRM) policy and strategic planning, community-level capacity building and institutional/organizational development, social anthropology, resource economics, and wildlife management and ecology. Additional possible areas of desirable expertise include general natural resource management (in such areas as fisheries ecology, forestry and silvicultural operations, etc.), eco-tourism development, natural resources marketing, business mangement, sustainable E/NRM financing mechanisms, program and project planning, management, implementation and monitoring and evaluation.

Due to the great prominence of this program and importance of this evaluation, to the maximum extent possible, all team members shall be experienced senior-level professionals within their respective areas of expertise. The team members shall possess an advanced degree and a minimum of ten years of work experience within their respective areas of expertise, at least half of which should have focussed on LDC situations. Demonstrated experience in Africa is mandatory for all team positions; prior southern Africa experience, in general, and Zimbabwe experience, in particular, is highly desirable. At least several team members shall possess demonstrated experience in planning, managing and implementing national, regional and/or international community-level development initiatives in LDC contexts. Prior USAID experience in these areas, as well as evaluating USAID programs and projects is highly desirable; familiarity with USAID's new reengineering principles and procedures is also highly desirable. All team members shall also possess well-developed

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APPENDIX C

THE EVALUATION TEAM

The Evaluation Team

Dr. Frederick W. Sowers, Team Leader, is an environmental geographer with 20 years experience in natural resource management programs in Africa, Latin America, and Asia. Dr. Sowers previously served in the USAID's Office of Evaluation as technical coordinator for a multi-year assessment of the performance and impact of the Agency's environment and natural resource management programs. Dr. Sowers has led and participated in numerous natural resource and biodiversity conservation project evaluations, including of Zambia's ADMADE program, conducted in 1995. He is currently involved in private conservation and ecotourism in Mexico and Honduras. In the evaluation, Dr. Sowers focused on general USAID issues, CAMPFIRE's regional dimension, lobbying, ART, and overall evaluation coordination and reporting.

Dr. Thomas J. Cook, Research Triangle Institute's (RTI) Principal Scientist in Social Science and International Development, has more than 20 years' experience in performance monitoring and program evaluation, strategic planning and management, social science research, and program evaluation methodology training. He leads RTI's international work in the program evaluation and performance measurement sectors. His international experience includes work for the World Bank, United Nations Development Programme, Asian Development Bank, USAID, J. Paul Getty Trust Conservation Institute, and the Eurasia Foundation. He has managed the design of a monitoring and evaluation system for the Environmental Division, USAID/Cairo, and led an evaluation for the UNDP Democracy and Governance Program in Moldova. On this evaluation, Dr. Cook addressed devolution, socio-political issues of CAMPFIRE, and the CA and USAID strategic planning.

Dr. Robert Davis, who has degrees in economics, agriculture, agronomy, and public administration, is an economist who specializes in natural resource management, with an emphasis on wildlife and rangelands, water resources, and fisheries. Currently working as Senior Associate at the University of Colorado's Institute of Behavioral Science, Dr. Davis previously served as Assistant Director for Economics in the US Department of Interior's Office of Policy Analysis. Dr. Davis has international experience in wildlife, national parks, biological diversity issues, and water resources. He has authored major studies of water resource economics and policy, including a book on the Okavango Water Resource Development Project in Botswana, written for Resources for the Future. He was stationed in Kenya as Ford Foundation economic advisor to the Kenya Ministry of Tourism and Wildlife, and subsequently as Visiting Senior Research Fellow at Kenyatta University's Institute for Development Studies, from 1976 to 1980. On this evaluation, his areas of focus were wildlife and land management issues and the economics of wildlife management and alternative NRM options.

Dr. Lynn Ellsworth is an independent consultant specializing in institutional and economic analysis of non-project and public organizations. She brings expertise in such areas as design and evaluation of grant programs, development of sustainability plans for organizations, and methodologies for organizational change. She has four years of consulting experience with non-profits in the US, Eastern Europe, Madagascar, and East Africa, and six years experience as a donor and grant-maker in West Africa with the International Development Research Centre. On this evaluation she focused on CAMPFIRE sustainability issues and on the CDF, CA, and IC and their interrelationships.

APPENDIX D

ITINERARY AND FIELD PROTOCOLS

Current Campfire Questions

Issue: Devolution of Authority (B.1.a)

1. **The Rural District Councils are the current "Appropriate Authorities"**

Is this the most appropriate level of devolution?
Does this level limit the achievement of C community development objectives?
Does this limit C's ability to move into other NRM management, non-wildlife indigenous resources?
What are realistic alternatives to CAMPFIRE current devolutionary approach to CBNRM (examples from other programs)(concessions, associations....)

2. **What is the authority of specific wards?**
3. **Describe how RDC actually work (exec. Committee, district council, wards, villages)**

Village (campfire sub-committee – village development committee VIDCO)
Ward (campfire sub-committee – ward development committee (WADCO)
District (campfire sub-committee – District Dev. Committee
District Council
Campfire Association (made up of elected wards) (is there an exec. Committee and who are they)

Which districts have permitted or encouraged creation of ward or village level concessions (as opposed to district controlling everything)

What do they think their decision making prerogatives are concern NR (at each level)?
What areas do they think they should have increased authority concerning NRM?
What do you see as primary barriers to having greater decision making for NRM?
Over last 10 years, what have been the greatest changes for NRM in their area?
What are most immediate changes which need to occur to get their decision making authority to point it should be over next 4 years? (personnel, institutional, policy, etc.).

DIVERSIFICATION

4. **Wildlife resources currently main income generator of CAMPFIRE districts. What do they think about diversification into other areas (forestry, cultural resources, traditional folklore, arts/crafts, bee-keeping, Mopane worms, etc. (cf. Table on Diversification). Do you think you could do more in diversifying?**

What do you see as main areas for potential diversification? How do you learn about new opportunities?
How could program funds be focused on this issue most effectively (in these areas)?
What are major barriers for diversification? How to overcome these?
Would there be greater potential for local management control (village level) being ceded by Rural District Councils, and what are implications for this. (Maybe conditionally for all future USAID funds to be used for this kind of management (with 90% for village 10% for RDC support)? Long term concession agreements with Monitoring.

5. **Will districts where wildlife is already important have much interest in moving in this direction? Will they be open to granting concessions to local villages or wards for managing non-wildlife resources? How would this work with current government regs?**

LAND USE

6. **What is most environmentally, economically, and culturally appropriate LAND USE strategy among CAMPFIRE RDC members? (Wildlife No one – even in non-wildlife areas?)**

Do you think wildlife management is most appropriate use of land?
Who are the key decision makers about land use (agriculture, herding, wildlife, tree farms,...), and how are land use decisions make (a few elite, community debate, individually, etc.
Do you think there is sufficient community involvement in land use debates?

1.0 Benefits Analysis at District Level

Intended Benefits	Perceived Benefits by Recipients	Observed Benefits Evidence of Benefits	Benefits Gap Analysis
Direct Management of NRM	Do you think the DC has control of the NR of your district? How do you exercise this control? Voice in Decision Making	How much money did the DC receive from NRM? How do they exercise legal authority?	
Sustainable NRM Practices adopted or applied by Campfire communities	Are receiving funds?	Graduate DL Schools, wells ..	
Bio-physical Monitoring System in Place	Establishment of Quotas; Status of NR Base	Setting of Animal Quotas in Approp. Manner	
Improved Surveillance			
Improved NRM Technical & Entrepreneurial skills Community Satisfaction with Campfire Services Information Flow/Reports/Docs. Received and Read Equitable Financial Management Access to Market Information	What do they perceive to be benefits? Worthwhile? Do they feel are receiving fare share of proceeds? Do you have info. On best way to sell NR products	Existence of a DataBase	

Benefits Analysis at Ward Level

Intended Benefits	Perceived Benefits by Recipients	Observed Benefits Evidence of Benefits	Benefits Gap Analysis
Direct Management of NRM	Do you think the DC has control of the NR of your district? How do you exercise this control?	How much money did the DC receive from NRM? How do they exercise legal authority?	
Sustainable NRM Practices adopted or applied by Campfire communities		# of Wards with established NRM Practices?	
Bio-physical Monitoring System in Place			
Improved Surveillance			
Improved NRM Technical skills Community Satisfaction with Campfire Services Information Flow/Reports/Docs. Received and Read Equitable Financial Management			

APPENDIX E

LOGICAL FRAMEWORK TABLE

PROJECT NO. 690-0251

ORIGINAL AUTHORIZATION: 20 AUG 89
CURRENT PACD: 31 AUGUST 1997
PROPOSED PACD: 31 AUGUST 1999

CRC: 09 SEPTEMBER 1994

LOGICAL FRAMEWORK
NATURAL RESOURCE MANAGEMENT PROJECT

ZIMBABWE : AMENDMENT NO. 2

NARRATIVE	ACHIEVEMENT & MEASURES	VERIFICATION	ASSUMPTIONS
GOAL: The development of economically sustainable communities on lands marginally suitable for agriculture.	– Community food security. – Incomes above subsistence, and in rising trend. – Wildlife resource base and revenues increasing.	– Nutrition surveys. – Income surveys. – DNPWLM reports.	– Food is available and affordable. – Incomes growth exceeds inflation. – National disasters do not eliminate wildlife resources in target areas.
PURPOSE: To expand community-based natural resource management and utilization throughout marginal lands nationwide; and to halt declines within the wildlife resource base, especially in Regions IV and V.	– NRM programs underway in 23 districts, with more looking to join. – Revenue distributions made to all participating communities. – Stable wildlife populations in targeted areas.	– DNPWLM and NGO reports; USAID site inspections. – Indications of interest from non-participating communities. – RDC reports. – DNPWLM reports.	– Continuing market for wildlife and veld products. – Communities are willing and able to learn and practise wildlife management. – Continued granting of Appropriate Authority status. – National will to protect endangered species.

APPENDIX F

GWANDA RURAL DISTRICT COUNCIL

Gwanda Rural District Council

Evaluation Team Field Trip

Information obtained from discussions with field staff and documentation are provided as representative of information obtained which helped lead team to conclusions and recommendations drawn. Mr. Ian Lloyd was particularly helpful in providing this information.

Doddleburn Ranch

Year	Income Source	Amount
1995	Hunting Safari: Inhlaba Safari	$209,250
1996	Hunting Safari: Tehabezi Safari	$26,484 (received the quota very late, hence a small return)
1997	Hunting Safare: Tshabezi Safari Crocodile Egg Collection: Mr. Evans	$183,400 (this will rise as there is a small amount outstanding) $630
1998*	Hunting Safaris Ilanga	$10,000 + US$ 17,152.50

Thull Shashe Concession Area

Year	Income Sources	Amount
1995	Hunting Safaris: Gariya Safaris	$10,650
1996	Hunting Safaris: Gariya Safaris	$15,610
1997	Hunting Safaris: Ilanga Safaris	$71,433
1998	Hunting Safaris: Ilanga Safaris	$10,000 + US$ 8,250

- Expected income. Money is in Zim dollars unless stated.

Dividends are distributed as follows:
50% to communities, distributed through the six wards concerned (of 20 within the district
34% retained by Council to cover management costs (i.e. game scout wages, diesel for the irrigation machines, uniforms, ammunitions, etc.)
14% retained by Council to cover administration costs (i.e. stationary, staff time for liaison with Safari operators, Parks, CA, Zimtrust, etc.)
2% Campfire Association levy

Natural Resources with potential for use under the CAMPFIRE programme

Crocodiles are used both for the collection of eggs and in rearing of crocodiles (for meat and hides). A project proposal is currently being developed as part of the Campfire programme for the establishment of a small hatchery.

Mapane tree caterpillars "Macimbi" are already harvested in Gwanda, although at present this is fairly small scale and not done commercially. Some Campfire committees are already regulating and charging for the collection of such caterpillars.

Fish from the numerous dams. Some dam committees are already regulating and charging for fishing. The potential of fish farming in some of the larger dams is currently being investigated. There is potential for ecotourism in regard to fishing.

Amarula fruit are already harvested in Gwanda, although at present it is fairly small scale and not done commercially. There is potential for commercial production.

Ecotourism, in terms of game viewing, fishing, viewing of rock paintings, etc. has a huge potential as the district is currently very under utilized in this area.

It is important to note that the Campfire programme is very young in Gwanda. This RDC only received appropriate authority in 1994, with the program actually starting in 1995. Many potential projects have not been fully explored, and the current program is still heavily focused on community training.

APPENDIX G

CDF REVISION AND EXTENSION BACKGROUND MATERIAL

Background for Support and Extension of the CDF

This appendix relates to the recommendation made by the evaluation team to extend the functional life of the CAMPFIRE Development Fund initiated under NRMP II by transforming it into a locally managed fund which would be distributed according to revised criteria over a longer period of time. The appendix describes a process or requesting proposals, offers draft text for a proposal solicitation brochure, suggests a review procedure, and considers some operational observations based on the team's fieldwork.

A. Two Stage Proposal Process and Call for CBNRM Project Ideas

First draft a brochure or ***Call for CBNRM Project Ideas*** that explains the competition, eligibility requirements and judging criteria. This document should be widely published (newspapers, radio interviews with project officers, faxes and mailings to NGOs working in CBNRM). The document invites organizations to submit CBNRM project ideas that are consistent with CAMPFIRE principles. Applicants would send in their project ideas and a neutral jury (composed of qualified experts from both within and outside the CCG/CA) would rank and choose winners. Winners would be invited to submit full proposals. They might then be given small grants or consulting assignments to fully develop their concepts into full-scale proposals. Of course, organizations who submit the winning project ideas would still be subject to a pre-award survey to determine if they would be eligible for a grant and, if so, under what terms of payment.

Initially, USAID and MLGNH would step back from the CDF approval process by taking only an oversight role. This rotating jury would be charged with ranking and commenting on grants and scoring them according to fixed criteria. Their ranks, scores, comments, and recommendations for funding would then be forwarded to the IC for official approval. The chain of approval should stop there. The IC would retain the right to countermand the independent panel's recommendations and rankings. In practice, this right should be exercised only rarely and, when exercised, the reasoning should be well documented.

In this transition scenario a clearer and simpler decision rule needs to be established to decide when cash advances are permissible. This needs to be documented and explained to potential grantees.

The current list of criteria should be reformulated in brochure form so as to be easier to read and to make it clear that CBNRM micro-credit projects at the village and ward level are welcomed by CDF as would participatory land-use planning and income-generating activities. In the brochure for the CDF, distinction should be made between "eligibility requirements" and "review criteria".

In general, grants should not be made for salaries, infrastructure, or capital equipment valued at more than $US 10,000, total. Neither should grants ordinarily cover organizational overheads or indirect costs of support NGOs of more than about ten percent.

In addition to existing criteria, proposals should be reviewed for:

a) the extent to which CAMPFIRE principles are evident in the design and

CALL FOR IDEAS

THE CAMPFIRE COMPETITION FOR IDEAS IN COMMUNITY-BASED NATURAL RESOURCE MANAGEMENT

USAID has established a grants fund for community-based natural resource projects, programmes, and research activities. A total of $Z 25,000,000 per year is available.

Grants will be given in three categories:

One time small projects of limited duration;
Programmes of activities that cover one or more villages, wards, or Districts and that take place over a 12-24 month time-frame;
Applied, action-oriented, and policy research.

Grants will be awarded in each category in a two-stage competition. In the first stage, eligible organizations are invited to submit a 3-5 page document explaining their project idea, programme idea, or research activity along with a one page cost estimate. These ***IDEAS FOR FUNDING*** *will be judged by neutral reviewers. Winners will then be invited to submit a fully developed programme or project document. Winners at this first stage will receive a small* ***planning grant*** *to enable them to fully develop their idea. The* ***planning grant*** *can cover feasibility studies, economic analysis, participatory rural appraisals, and planning workshops. Winners of the planning grant can then submit their fully developed ideas to a second-stage review during which they can be awarded full or partial fund grant for a maximum of two-years of activity.*

WHO IS ELIGIBLE?

The idea must come from a registered Zimbabwean charitable, educational, scientific, or religious organization or an international NGO operating in Zimbabwe. A copy of the organization's constitution, by-laws, and registration number must accompany the initial idea, as well as a list of board members a list of staff members.

Publicly-funded organizations in good financial standing with the government are also eligible. If the request comes from a District Council, the council should be prepared to document its CAMPFIRE policies and how it actually shares natural resource revenue with producer villages and wards, as prescribed by the CAMPFIRE philosophy.

WHAT KIND OF PROJECTS OR ACTIVITIES CAN BE FUNDED?

The idea must concern community-based management of natural resources (wildlife, trees, soil, grass, fish, water, wild-fruit, scenic landscapes, etc.) in the widest sense of the term. Social welfare projects are not eligible.

WHAT CRITERIA WILL THE JURORS USE TO RANK IDEAS?

In the first stage, winners will be judged on:

Pertinence of the idea to community-based natural resource management and the CAMPFIRE philosophy (maximum 10 points).

Likelihood and overall promise of success (maximum 10 points)

Clarity of purpose(s) (maximum 10 points)

Evidence of community support for the idea and for the organization(s) submitting the idea (maximum 10 points).

Evidence of clear thinking about how the activity will be sustainable in the long-run when the grant money runs out (maximum 10 points)

Originality of the idea (maximum 10 points)

Degree to which the idea reflects collaboration and a spirit of partnership among two or more organizations working together on the idea (maximum 10 points)

Geographical specificity of the zone of activity (maximum 10 points)

In the second stage, winners will be reviewed on realism of the budget and workplan they submit, ability to manage the grant money, and capacity to carry out the fully developed idea.

FOR MORE INFORMATION OR TO ASK QUESTIONS:

Call DA, or see your CAMPFIRE Coordinator who has information available.

C. Potential Modalities of Operation

To set this up for the longer term, USAID should reallocate remaining available project funds to a *trust instrument* in the US (an unexplored option would be to do so in the UK where trust law is equally developed). The trust instrument would have a small US board of trustees -- 2 to 3 people serving pro bono with only cost reimbursement. The trustees would be charged with oversight of the financial investment and assuring annual transfer of the grant budget to the selected Zimbabwean local organization. Annual transfer is usually made in the trust contract contingent upon receipt of an unqualified international quality audit and the local partner=s use of internationally acceptable accounting practices.

It may be possible for someone from USAID-Washington to serve as one of the official trustees. This is desirable, for in such situations USAID is required to report annually on the use of the

might also be encouraged under this scenario. If investment returns are exceptional, the annual grant budget might also be increased. If minor capital and small infrastructure increased the size of grants, a smaller number of grants could be made.

The transactions cost of developing grants should be reduced and fairness enhanced by avoiding the program officer mode of grant-making common to US foundations. Rather the fund should adopt the grant competition model using rotating panels of jurors to select among proposals. Competition is by far the best practice in grant-making.

Regardless of the intermediary chosen (new or existing), the selected organization would be required to produce annual audited financial statements to the US-based trustees of the trust instrument and take minimum precautions to assure that all grants would be for scientific, educational or charitable purposes.

D. Observations Pertaining to CDF Operation

- The purpose of allocating grant funds on a competitive basis is to establish the true absorptive capacity of the many and varied organization's seeking to work with CAMPFIRE villages and wards. It also ensures that this absorptive capacity is not exceeded. The competitive approach relieves IC of the responsibility of proposal development and allows many other actors to contribute their ideas and time to proposal development.

- All proposal ideas over US$ 5,000 should be submitted by eligible organizations at least one month before the bi-annual meeting of the jury. However, the jury should give sufficient commentary on rejected proposals so that applicants are free to improve their proposal ideas and resubmit in the next competition.

- IC's grant officer might also facilitate quarterly "proposal writing and development" workshops in different regions over a two-three day period. Interested participants can be invited to work on their project ideas and complete proposals during the workshop. CA or CCG staff might participate in the training to complement the proposal writing skills with technical knowledge and support. These would be low-key, voluntary workshops that do not pay for the transport, accommodations and per diem of participants.

- Twenty-five percent of the CDF might also be allocated for small "proposal development grants" using a quick-release mechanism (perhaps in the form of consulting contracts with two people at IC signing off to indicate approval). Such grants should not exceed $5000 each and might often be directly managed by IC as it would a consulting contract. Their purpose would be to allow eligible groups to hold workshops, hire facilitators, collect data relevant to the preparation of a project, conduct baseline and planning PRAs, and contract specialists for feasibility studies. IC would not actually carry out the work; each recipient would use those resources it judged most appropriate and would most likely team with a CCG partner (including the CA itself).

Gwanda District reports that " Six wards in Gwanda have earned a total which is 50% of the CAMPFIRE proceeds from sport hunting". A District report shows ward allocations of Z$ 104,858 for 1996, Z$18,742 for 1997, and Z$ 123,356 for 1998 (of which only Z$ 81,938 had actually been spent). Dividend payments are usually made in February following the year the income is earned. So 50% of the 1998 figure here represents the allocation from sport hunting in 1997. The 6 wards deposit their allocated dividend funds into their own bank account until they can decide as a group how they want to spend the money. This took a full year for decisions to be made, after much internal disagreement. The RDC did not get in the middle of these discussions. Gwanda revenues are nowhere near enough for sustainably employing the CAMPFIRE coordinator and 6 game scouts currently being paid for by USAID (Z$ 208,000), though this district has put in Z$162,900!

2 •
In Hurungwe, dividends are split 50% for ward level producer communities at the village level, 35% for ward level wildlife management control, and 15% for District overhead needs. Local community members in the six district CAMPFIRE wards agreed to use their CAMPFIRE 50% dividends for a CAMPFIRE Tractor Program, to purchase equipment to use in small dam construction and erosion controlling contour riding in major maize fields. In 1996, two tractors, one reversible plough, and two dam scoops were purchased. In 1997, two more tractors, reversible ploughs, dam scoops, and one tow grader were purchased. The tractors have also been sent around to all the CAMPFIRE wards to support whatever communities felt

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In Hurungwe, dividends are split 50% for ward level producer communities at the village level, 35% for ward level wildlife management control, and 15% for District overhead needs. Local community members in the six district CAMPFIRE wards agreed to use their CAMPFIRE 50% dividends for a CAMPFIRE Tractor Program, to purchase equipment to use in small dam construction and erosion controlling contour riding in major maize fields. In 1996, two tractors, one reversible plough, and two dam scoops were purchased. In 1997, two more tractors, reversible ploughs, dam scoops, and one tow grader were purchased. The tractors have also been sent around to all the CAMPFIRE wards to support whatever communities felt needed to be done. In Nyamakate ward, contour construction, and repairing of the Huyo farm to market road was completed; in Chundu, the Mayamaba road was repaired and hauling of bricks, river and pit sand for the Karuru health clinic done; in Kazangarare ward, two farm to market dirt roads were repaired, and stones were transported for the Dete dip tank; and in Chidamyoyo and Rengwe wards, a road to Badze school and Point 4 roads were repaired. Other projects underway or completed include: construction of Chipfuko primary school and Nyamakata secondary school, construction of a waiting mother's shelter at Chundu clinic and four blair toilets, a classroom block at Kabidza and Mahwua primary construction of dip tanks in Rengwe and Kazangarare wards, with construction of a weir dam in Rengwe ward in progress. All these, and other projects were of general benefit to the ward populations and would have been left un-done without this CAMPFIRE revenue. They have provided important employment possibilities for many local residents as well, money which will further stimulate the local economy.

APPENDIX H

CAMPFIRE ASSOCIATION META-ANALYSIS OF PERFORMANCE

Campfire Association Work Plan Performance Analysis: Meta-Analysis of Documents and Other Data Sources							
Work Plan Project Outputs (1-8)	**ULG Midterm Evaluation January 1994**	**Price Waterhouse, Pre-Award Assessment June 1996**	**Garcia, Huchu: Evaluation February 1997**	**NRMP II Annual Planning Workshop August 1997**	**Garcia: Evaluation September 1997**	**Field Observations**	**Comments from Interviews, Other Sources**
1. Policy Related to CA-NRM issues formulated, implemented and monitored.			Scheduled meetings held; minutes produced but need more timely distribution; CITES position paper prepared. RDC feedback that CA policy guidance inadequate or non-existent due to poor communication or mis-interpretation.		In general, CA is progressing well in accomplishing its tasks and activities contained in its annual work plan; improvement in meeting agenda and minutes distribution, but of poor quality. Some improvement in policy guidance, but RDC still concerned about lack of CA/CCG communication on policy matters.	RDC's want more action on policy matters, such as extending appropriate authority status to other resources, such as forestry, minerals, etc.	CA lacks a clear policy agenda and a plan to implement it. Policy viewed as "vacuum" in the project. PET policy sub-committee held first meeting in early March 1998, and developed agenda of "issues" but action on them just getting underway.

Campfire Association Work Plan Performance Analysis: Meta-Analysis of Documents and Other Data Sources							
Work Plan Project Outputs (1-8)	**ULG Midterm Evaluation January 1994**	**Price Waterhouse, Pre-Award Assessment June 1996**	**Garcia, Huchu: Evaluation February 1997**	**NRMP II Annual Planning Workshop August 1997**	**Garcia: Evaluation September 1997**	**Field Observations**	**Comments from Interviews, Other Sources**
3.A. Effective CA Advocacy locally and inter-nationally.			Publications behind schedule; behind on public relations strategy development; behind on visitor strategy development.		Publications still lag behind schedule; Publications relations strategy still behind schedule; visitor strategy still behind schedule.		
3.B. Effective information developmen t and disseminati on.	RDCs feel they're not receiving adequate CITES information, yet they could play more active role.			Some RDCs are not even aware of agencies such as ART; research outputs from CASS and WWF do not filter down to RDCs.	RDCs feel they are not receiving adequate information on NRMP activities; they feel they should have more a active role in CA activities. Little progress in establishing routine communication system of communication with the Board of Management and the Association membership.	CAMPFIRE dispersal across Zimbabwe's vast geography, and the time involved in traveling to remote communal areas, makes essential direct CA communication with RDCs and communities very difficult and problematic.	

Campfire Association Work Plan Performance Analysis: Meta-Analysis of Documents and Other Data Sources							
Work Plan Project Outputs (1-8)	**ULG Midterm Evaluation January 1994**	**Price Waterhouse, Pre-Award Assessment June 1996**	**Garcia, Huchu: Evaluation February 1997**	**NRMP II Annual Planning Workshop August 1997**	**Garcia: Evaluation September 1997**	**Field Observations**	**Comments from Interviews, Other Sources**
5.Assist RDCs to develop capacity to market and promote CB natural resource utilization projects			WWF, CASS tasked by PET to conduct eco-tourism study; CA, Zimtrust and ART exploring marketing strategies. Some indigenous resources identified.	RDCs and the communities they represent are not included in important activities, such as attending international symposia and meetings.	WWF, CASS tasked by PET to conduct eco-tourism study; CA, Zimtrust and ART exploring marketing strategies; Some indigenous resources identified; however, no real progress achieved - not much accomplished.		

Campfire Association Work Plan Performance Analysis: Meta-Analysis of Documents and Other Data Sources							
Work Plan Project Outputs (1-8)	**ULG Midterm Evaluation January 1994**	**Price Waterhouse, Pre-Award Assessment June 1996**	**Garcia, Huchu: Evaluation February 1997**	**NRMP II Annual Planning Workshop August 1997**	**Garcia: Evaluation September 1997**	**Field Observations**	**Comments from Interviews, Other Sources**
7. Increased revenues from its constituent base and more diversified donor base to ensure CA financial sustainability			Price Waterhouse to prepare preliminary strategy; no structured plan for development of alternative sources of revenue; no annual business plan developed		CA management is beginning the process to develop and implement innovative strategies that will ensure its financial future; however, it lacks a viable plan for increasing membership, a structured plan for development of alternative sources of revenue or an annual business plan developed; the Association cannot depend solely on dues from its membership and an occasional external donor for financial support.		CA lacks a firm strategy or plan for building future financial sustainability. Discussions with CA management reveal disparate ideas lacking a coherent action plan. No direct evidence, other than the Price Waterhouse study, of action in this area.

APPENDIX I

EXAMPLES OF CAMPFIRE M&E FORMS

1. POMS Bi-Annual Survey Sheets
2. CA Customer Service Plan
3. PAC Reporting Forms
4. CA Hunt Return Form
5. Revised DNPWLM Hunt Forms

POMS BI-ANNUAL SURVEY SHEETS FOR WARD CAMPFIRE COMMITTEES

NAME OF WCC	WCC ID	DISTRICT	DISTRICT ID	AGE OF WCC

NO. OF CONTACTS IN MONITORING PERIOD		MONITORING PERIOD		AREA MANAGER

A. PROCEDURAL FUNCTIONING OF WARD CAMPFIRE COMMITTEES

A.1

Constitution & bylaws in place	----3-------2-------1-------0--------	Constitution & bylaws not in place

A.2

Committee meetings held according to bylaw requirements	----3-------2-------1-------0--------	Committee meetings not held & bylaws non-existent

A.3

General meetings held regularly	----3-------2-------1-------0--------	General meetings not held

A.4

Meetings held according to proper agenda & minuting procedures	----3-------2-------1-------0--------	Agenda & minuting procedure not followed

A.5

Financial management & reporting procedures followed	-----3-------2-------1-------0--------	Financial & reporting procedures not followed

A.6

Budgeting procedures followed	-----3-------2-------1-------0-------	Budgeting procedures not followed

A.7 NARRATIVE SUMMARY OF WARD COMMITTEE FUNCTIONING

C. PRODUCER COMMUNITY PARTICIPATION

C.1

CAMPFIRE awareness & support within the community	-----3------2------1------0----------	Lack of CAMPFIRE awareness & support in community

C.2

Accountability of WCC to community. Community demand WCC accountability.	-----3------2------1------0----------	Lack of accountability of WCC to community. Community cannot demand WCC accountability.

C.3

Much community involvement in the decision making process	-----3------2------1------0----------	Much community involvement in the decision making process

C.4 NARRATIVE SUMMARY OF PRODUCER COMMUNITY PARTICIPATION

E. DEVELOPING & IMPLEMENTING NATURAL RESOURCE MANAGEMENT (NRM) PLANS & PROJECTS, & INVOLVING CAMPFIRE WORKERS

E.1

Good community involvement in developing NRM plans	-----3-------2-------1-------0----------	Poor community involvement in developing NRM plans

E.2

WWC able to source technical assistance when necessary	-----3-------2-------1-------0----------	WWC unable to source technical assistance when necessary

E.3

WCC able to monitor community resource off-take	-----3-------2-------1-------0----------	WCC unable to monitor community resource off-take

E.4

PAC strategy developed & implemented	-----3-------2-------1-------0----------	PAC strategy not developed nor implemented

E.5

Community decides revenue distribution. Direct & indirect benefits accrue to community	------3-------2-------1--------0----------	Community does not decides revenue distribution. Benefit stream distorted.

E.6

Community prioritises, chooses, implements, supervises & maintains own projects	------3-------2-------1-------0--------	Community does not prioritise, choose, implement, supervise or maintain own projects

E.7

Community Campfire Worker role & supervision clear with community & RDC.	------3-------2-------1-------0--------	Community Campfire Worker role & supervision not clear with community & RDC.

E.8

CCW trained for role	-----3-------2-------1-------0----------	CCW not trained for role

E.9 NARRATIVE SUMMARY OF DEVELOPMENT & IMPLEMENTATION OF NRM PLANS & PROJECTS & ROLE OF CCW WORKERS.

POMS BI-ANNUAL SURVEY SHEETS FOR WARD/VILLAGE CAMPFIRE COMMITTEES

NAME OF WCC	WCC ID	DISTRICT	DISTRICT ID	AGE OF WCC	AREA MANAGER	NO. OF CONTACTS IN MONITORING PERIOD	MONITORING PERIOD

CATEGORY A:. PROCEDURAL FUNCTIONING OF WARD CAMPFIRE COMMITTEES

Indicator A1: WCC / VCC Constitution

1	*Committee constitution not developed*
2	*Committee constitution in existence but, not documented (orally agreed on)*
3	*Draft committee constitution developed*
4	*final draft produced but not yet adopted by general community*
5	*Committee constitution in place, adopted by general community and documented*

Indicator A2: Ward/Village Campfire Committee Meetings

1	*No meetings held*
2	*Meetings held because of external pressures (i.e from RDC, Govs), orally agreed meeting schedule, capitalise on other meetings*
3	*Meetings held according to draft constitution to address burning issues or through individual committee member initiatives*
4	*Meetings held but partially follow constitution*
5	*Meetings held according to constitutional requirements*

Indicator A3: General Community Meetings

1	*No general community meetings called by WCC although community asked for general meetings*
2	*General community meetings held and called by WCC in response to external insistence*
3	*General community meetings held and called by WCC without a constitution or its draft*
4	*General community meetings held in partial conformity to constitutional requirements*
5	*General meetings held and called by WCC according to constitutional requirements*

Indicator A4: Agenda for Committee Meetings

1	*No agenda is set for Committee meetings*
2	*Agenda set informally by some committee members and not circulated*
3	*Agenda set in the meeting*
4	*Agenda set, circulated in advance but not adhered to*
5	*Agenda set in consultation with members, circulated in advance and is adhered to*

Comments:

POMS BI-ANNUAL SURVEY SHEETS FOR WARD/VILLAGE CAMPFIRE COMMITTEES

CATEGORY B: QUALITY OF WARD/VILLAGE CAMPFIRE COMMITTEES

Indicator B1: Implementation of Community Projects

1	*No Community projects (income generating/social infrastructure) identified*
2	*Community projects identified but not implemented*
3	*Community projects implemented as a result of external influence*
4	*Community projects implemented through initiatives of a few committee members*
5	*All planned community projects implemented and well managed*

Indicator B2: Decision Making Process[2]

1	*WCC/VCC makes all the decisions (dictates)*
2	*WCC/VCC makes all decisions as a result of non participation of communities in the process*
3	*WCC/VCC makes all decisions because of low community participation*
4	*Community entrusts WCC/VCC to make decisions*
5	*Consensus on major decisions made at general community meetings*

Indicator B3: WCC ability to Secure Technical Services

1	*WCC/VCC has not identified and sourced any technical assistance*
2	*WCC/VCC has identified available technical assistance but have not yet secured them*
3	*WCC/VCC has been able to secure technical assistance from local agencies they are currently working with*
4	*WCC/VCC has been able to secure external technical assistance (e.g. RDC, CCG etc.)*
5	*WCC/VCC has identified and secured government and NGO services (e.g. training)*

Indicator B2: Decision Making Process[3]

1	*WCC/VCC makes all the decisions (dictates)*
2	*WCC/VCC makes all decisions as a result of non-participation of communities in the process*
3	*WCC/VCC makes all decisions because of low community participation*
4	*Community entrusts WCC/VCC to make decisions*
5	*Consensus on major decisions made at general community meetings*

Comments:

[2] Minutes can be used for verification

[3] Minutes can be used for verification

POMS BI-ANNUAL SURVEY SHEETS FOR WARD/VILLAGE CAMPFIRE COMMITTEES

CATEGORY D - NATURAL RESOURCES MANAGEMENT

Indicator D1: Inventory of available Natural Resources

1	*No inventory of natural resources undertaken*
2	*Oral inventory is in place and the community is aware of the value of resources*
3	*Communities identified available resources but have not documented the available natural resources*
4	*Communities have identified and documented few major natural resources*
5	*Inventory of all potential natural resources for utilisation undertaken and documented*

Indicator D2: Zoning / Simple Landuse Plans

1	*Awareness on LUP non-existent*
2	*Awareness on LUP exists*
3	*Community appreciates and accepts the concept of LUP*
4	*Community has produced simple LUP and is prepared to implement it.*
5	*Community has produced simple LUP, and has implemented it*

Indicator D3: Natural Resources Management by-laws

1	*No natural resources management by laws developed.*
2	*Natural resources management by-laws in the process of being discussed with communities but draft not yet documented*
3	*Draft natural resources management by-laws in place but not yet adopted by Council*
4	*Draft natural resources management by-laws in place and adopted by RDC*
5	*Natural resources management by-laws approved and gazetted by local government and being implemented by RDC and community*

Indicator D4: Natural Resource Utilisation (resource off-take)[4]

1	*No Resource monitoring system in place*
2	*Resource Monitoring system at developmental stage*
3	*Resource monitoring system in place but not functional*
4	*Resource monitoring system functional but results not used*
5	*Resource monitoring system functional and results uniforms decision-making*

Comments:

[4] Respondents may be asked to explain types of resources monitored

GOKWE DISTRICT

PROBLEM ANIMAL REPORT ..... PAR FI .. NO: .....

Date of complaint: ..... Name of PAR: ..... Ward

Date of incident: ..... Complainant: .....

Locality (village): ..... Grid Ref. (6 figures) .....

Nature of Problem (tick where appropriate):

- ☐ Crop Damage
- ☐ Livestock maimed or killed
- ☐ Damage to property, e.g. grain bins
- ☐ Threat to human life
- ☐ Other (Specify)

Wildlife responsible (tick): Numbers involved: Sex:

- ☐ Elephant ..... ☐ ..... ☐
- ☐ Buffalo ..... ☐ ..... ☐
- ☐ Lion ..... ☐ ..... ☐
- ☐ Baboons ..... ☐ ..... ☐
- ☐ Other (Specify) ..... ☐ ..... ☐

Type of crop damaged (tick): How good was the crop before damage occurred (tick): Age of Crop (tick S for Seedling, I for intermediate or M for Mature):

	Good	Medium	Poor	S	I	M
☐ Maize	☐	☐	☐	☐	☐	☐
☐ Millet	☐	☐	☐	☐	☐	☐
☐ Sorghum	☐	☐	☐	☐	☐	☐
☐ Cotton	☐	☐	☐	☐	☐	☐
☐ Vegetables	☐	☐	☐	☐	☐	☐
☐ Other	☐	☐	☐	☐	☐	☐

Dimensions (paces) of total field where damage occurred:

Length: .....(paces)

Width: .....(paces)

Dimensions (paces) of actual damaged portion of field:

Length: .....(paces)

Width: .....(paces)

Other relevant details (e.g. movement or behaviour of problem animal, number of livestock killed, type of property damaged, numbers of previous reports in area etc.)

Copy to council: Yes / No Date copy sent: .....

How was the copy sent?: .....

PROBLEM ANIMAL CONTROL REPORT

PAC F:

Copy of PAR report received date: .....

Name of authorised control officer:.....

Position held: .....

Specify animal(s) against which action was taken:.....

Animal(s) harassed: YES\NO

Animal(s) destroyed: YES/NO If YES, how many?:.....

Total no. in herd (if applicable): ....

Locstat (o figure gird reference it possible) .....

Sex(es) of animals destroyed .....

Was animal killed instantly?: YES/NO

Was animal harassed, destroyed at damage site?: YES/NO

Method of harassment (Brief details):

Was the PAC call out justified?: YES/NO

Distance travelled by vehicle (Km) ..... Distance travelled on foot .....

No. of days and nights spent out .....

No. of rounds of ammunition expended:.....Rifle Calibre ....

Assistance received (Brief details if applicable):

lide recovered: YES/NO

'o which base?: .....No. of hides recovered .....

las hide been properly cleaned, slated and stored? YES/NO

low were the tusks disposed of? CLIENT/COUNCIL

erial no. of issue voucher if delivered to Council .....

'ombined weight of tusks (Kg): .....

ny other remarks:

igned: ..... Date: .....

'AC F1 and PAC F2 can be combined back to back.

NAME OF CLIENT H. W F KLINGSHIEN NAME OF OPERATOR HUNTERS

ADDRESS OF CLIENT PERIOD OF HUNT 29 5 96 → 01/6/96

Hanningen, Coromandy

RURAL DISTRICT COUNCIL Gumuve

Species	WARD/VIDCO	Grid Ref	Date Shot	Killed/ Wounded	Trophy Size	Sex M/F	Trophy Fees paid to RDC US$	Trophy Fees paid to RDC Z$
Elephant-male								
Elephant-female								
Buffalo-Water								
Eland								
Kudu								
Sable								
Roan								
Tsessebe								
Wildebeest								
Reedbuck								
Oribi								
Bushbuck								
Nyala								
Bushpig								
Warthog								
Giraffe								
Hippopotamus								
Crocodile								
Leopard								
Lion								
Cheetah								
Spotted Hyaena								
Brown Hyaena								
Aardwolf								
Wild Dog								
Jackal								
Honey Badger								
Civet								
Genet								
Caracal								
Serval								
Aardvark								
Porcupine								
Scrub Hare								
Rabbit								
Vervet Monkey								
Guinea fowl								
Francolin								
Sandgrouse								
Pigeon/doves								
Quail								
Sub TOTAL carried forward								

Species	WARD/VIDCO	Grid Ref	Date Shot	Killed/ Wounded	Trophy Size	Sex M/F	Trophy Fees paid to RDC US$	Trophy Fees paid to RDC Z$
OTHER (Specify)								
Sub TOTAL brought forward								
TOTAL								

HUNTER DAYS 6 days

GUEST DAYS —

RECEIPT No 414

PERCENTAGE OF GROSS REVENUE PAID TO R D C 0%

ACTUAL REVENUE PAID TO R D C

HUNTER DAILY RATE

GUEST DAILY RATE —

VAT 's VALUE

COMMENTS

Cash Signature-Client

PP Simbaas.

Name and Signature-Professional H

DATE STAMP 12 JUL 1996

ZIMBABWE [illegible] LTD.

P.O. [illegible]

RUWA

Authorised by

1st Copy — Black ink (Campfire Unit, DN

2nd Copy — Red ink (Campfire Associatio

3rd Copy — Blue ink (Rural District Counc

4th Copy — Black ink (Safari Operator)

(continued from Page 7)

HUNTER

CONCESSION	START DATE	STOP DATE	DAYS

Name and address of processing agent or Taxidermist: .....

.....

Name and address of shipping agent: .....

.....

SPECIES	SEX	LOCATION					Date shot	Killed/ Wounded	TROPHY SIZE as per safari Club International Standard	TROPHY FEES US$
		District	Concession/Farm	Ward	Village	Grid Ref.				
									Total	

COMMENTS .....

I, ... hereby certify that the information given in this return is to the best of my knowledge, true and correct

IMMIGRATION CONTROL AUTHORIZATION REFERENCE (NPWCTLS FORM II) .....

Signature of foreign client ..... Date .....

Signature of Professional Hunter ..... Date .....

*for elephant give left and right measurements **

TAXIDERMIST POST-PROCESSING RETURN FORM NP ANNEX

NP9 No. _____ to which the animals listed below refer

Name of Taxidermist: .....

Address .....

.....

Name of client: .....

Country of destination of trophies .....

Description of manufactured article	Weight	Quantity	Date acquired	Name, address and licence/permit number of dealer who supplied the manufactured articles

TERMS AND CONDITIONS

1) The holder of this authority and any person who is specified as hunter shall comply with the requirements of the Parks and Wild Life Act and any regulations made thereunder.

2) Where any dangerous animal as defined in the Act is wounded or believed to have been wounded, a written report shall be made by the holder in person to the nearest permanent office of the Department or Police. The holder shall compile a written report in which he shall set out the full circumstances of the wounding. Such report shall indicate an accurate map reference, the date and time of wounding and direction of flight of the wounded animal. The follow-up action taken or intended to be taken by the holder must be stated. The report shall be made, handed over to National Parks or Z.R. Police within 24 hours of the wounding of the animal.

3) Where the sex of any animal has been specified on this authority, the opposite sex of the same species shall not be hunted instead

4) No problem animal control shall be undertaken by a client.

5) The holder of an authority is required to enter the details of any animal killed or wounded on Form NP9)

6) The holder of this authority shall produce it on demand.

7) The holder shall keep this record for a three-year period

8) This authority is not valid if not stamped by an authorized person The authority is only valid for hunting in the inscribed area. Separate forms are to be submitted for each hunting area

9) The Director may attach such additional terms and conditions to this authority as are deemed necessary and any such attachment shall then form part of this authority

10) This authority is issued in terms of section 59 of the Parks and Wild Life Act [*Chapter 20:14*] and section 59 of the Parks and Wild Life (General) Regulations, Statutory Instrument 362 of 1990)

"FORM SPR 1 (*Section 60(4)*)

PART I

SPORT HUNTING REGISTRATION FORM

1 This form is to be submitted by the 28th of February each year or before hunting commences whichever is the sooner.

2 This applies to all animals listed in the year end hunting return intended for sport hunting by foreign clients, whether for bait or trophies and will be appearing on the CITES/NP9 form at the conclusion of a hunt.

Name of land owner .....

Address of landowner: .....

Size of property in HECTARES .....

Name of lessee (where appropriate) .....

Address of lessee: .....

Name of operator to whom hunting rights have been sold: .....

TRH No of operator who will be hunting the quota .....

Species	Quota	Species	Quota

BENEFICIARY CONTACT MONITORING

WARD DATA COLLECTION FORM

YEAR DATA IS COLLECTED .....

MONTH DATA IS COLLECTED .....

DISTRICT WARD IS IN .....

WARD NAME/NUMBER .....

NAME OF WARD CAMPFIRE CHAIRPERSON .....

NAME OF WARD CAMPFIRE SECRETARY .....

A.

1. Estimated Ward population .....

2. No. of Households presently in ward .....

3. Number of Ward CAMPFIRE General meetings held in 1997 .....

4. No. of Ward CAMPFIRE Committee Meetings held in 1997 .....

5. Household representation at Ward CAMPFIRE General Meetings in 1997. Complete according to number of meetings held.

Date Ward CAMPFIRE General Meeting was held	Total households attended	Number of Households represented by female members	Number of Households represented by male members

B2. Total Amount Generated .....

B3. Uses of Generated 1997 CAMPFIRE Revenue

ACTIVITY	AMOUNT USED/COMMITTED

D. HEALTH								
Clinic Blocks								
Mothers' Shelters								
Staff Houses								
Toilets								
.....								
.....								
.....								
E. COMMERCIAL								
Grinding Mills								
Tuckshops								
Warehouses								
Lodges								
Crafts Centres								
.....								
.....								
.....								
E. SOCIAL								
Football clubs								
.....								
.....								
.....								
F. OTHER								
.....								
.....								

C.

C1. COMMUNITY NATURAL RESOURCE POLICING

ACTIVITY	NUMBER CAUGHT	NUMBER EDUCATED	NUMBER RECEIVED WARNING	NUMBER FINED	NUMBER .....
TREE CUTTING					
RIVER BANK CULTIVATION					
STARTING VELDT FIRES					
NO CONSERVATION WORKS ON ARABLE					
FISH POACHING					
GOLD PANNING					

C2. Wildlife Poaching in 1997

Wild Animal	No. Of snares found	No. Of carcasses found	No. Of people caught
Elephants			
Buffaloes			
Kudus			
Zebras			
Crocodiles			
Impalas/bucks/hares			
Lions			
Leopards			
baboons			

D

D1. TYPES OF TRAINING RECEIVED IN 1997 BY WARD MEMBERS UNDER CAMPFIRE PROGRAMME

TRAINING ACTIVITY	WHO ATTENDED	NUMBER ATTENDED	FACILITATING ORGANISATION	WHO FINANCED COURSE	COMMENTS
Constitution Development	WCC members				
	Resource monitors and game scouts				
	Traditional Leaders				
By-law Formulation	WCC members				
	Resource monitors and game scouts				
	Traditional Leaders				
Project management Courses	WCC members				
	Resource monitors and game scouts				
	Traditional Leaders				

Land Use Planning	WCC members				
	Resource monitors and game scouts				
	Traditional Leaders				
Bookkeeping and Record keeping	WCC members				
	Resource monitors and game scouts				
	Traditional Leaders				
Financial Management	WCC members				
	Resource monitors and game scouts				
	Traditional Leaders				
Meeting Procedures and Conflict resolution	WCC members				
	Resource monitors and game scouts				
	Traditional Leaders				
	WCC members				
	Resource monitors and game scouts				
	Traditional Leaders				

APPENDIX J

PUBLIC CONTROVERSY AND THE MEDIA

1. Example of Local Press Coverage of Elephants and CAMPFIRE, March 1998
2. Animal Rights Position and Campaign, HSUS Exhibits
3. What the Experts Say
4. ART Response to HSUS
5. Exibits of the Range of Media Coverage

hamper conservation.

Michael De Alessi is a research associate at CEI and attended the CITES meeting in Zimbabwe.

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Appendix J

The Herald

Incorporating the Nation

ESTABLISHED 1891
Registered at the GPO as a newspaper

HARARE, TUESDAY MARCH 24 1998

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mazda

GET THE FEELIN

Wild animals wreak havoc

USAID PROBLEM . . . These villagers in Gokwe sift through one of the flattened maize fields recently, salvaging the little that was left after elephants destroyed hectares of maize and cotton in the area.

Elephants destroy 50 000h fields, lions kill livestock

Herald Reporter

TWO elephant herds have destroyed 50 000 hectares of cotton and maize in the Nenyunga and Slamchembu chieftainships of Gokwe North, while lions are killing livestock.

The elephants have left villagers in Zhomba, Kamakola, Nenyunga and Slamchembu areas with nothing to harvest as all their maize and cotton crops were destroyed.

Now, there are fears that communal farmers in these areas along the Sengwa River may need drought relief food this year if nothing is done to control the elephants.

A lone bull also gored and trampled a 60-year-old woman, Mrs Gonese Chikono of Mutemarungo village in Madzivazvidzo, to death on Wednesday morning as she was harvesting crops in her field and Mr Mavious Shanaura, who was herding cattle in Nenyunga area, was injured by the elephants last week.

The elephants, which are roaming the area in two groups of 15 and 20, are now giving Nenyunga and Slamchembu communal farmers sleepless nights as they invade fields and destroy all crops they come across.

It is understood that the elephants move from the game corridor running between Chirisa Safari Area and Chizarira National Park to the nearby villages of Nenyunga, Slamchembu, Madzivazvidzo, Kahobo and Chireya 5.

The councillor for Nenyunga ward, Cllr Eleck Mkandla, said the animals roam the fields in broad daylight scaring

people from o activities.

Although Gokwe Rural District C had a problem control contract safari operator to the animals, he h been able to succ control them.

Cllr Mkandla s contract obliges th operator to react wild animals. He a the operator of t scare off the anim rubber bullets.

He said the pe Nenyunga were pc ing to the perenn mal problem, "al they have the cap adequately feed selves. Council use Campfire pr on people whose have been destro the wild animals".

Zhomba farm Johnson Pondo zanywa, whose 5 l

© To Page

CAMPFIRE:

A Close Look at the Costs and Consequences

APRIL 1997

The Humane Society of the United States (HSUS) was founded in 1954 to promote the humane treatment of animals and foster respect and compassion for, and understanding of, all creatures. Today its message of care and protection embraces not only the animal kingdom but also the earth and its environment. To achieve its goals, The HSUS works through educational, legislative, and investigative means. The HSUS maintains nine regional offices in the United States; its worldwide outreach is supported by its global humane family of organizations. **Humane Society International (HSI)** is The HSUS in its work abroad.

THE HUMANE SOCIETY OF THE UNITED STATES / HUMANE SOCIETY INTERNATIONAL

© 1997

annual meeting of Safari Club International, where they represented the Zimbabwe trophy hunting industry. Eighty-four percent of Americans oppose elephant trophy hunting, and the same number oppose taxpayer dollars being used to promote or enable elephant trophy hunting. These were the results of a December 1996 nationwide poll conducted by Penn & Schoen Associates, Inc. Yet, through USAID, taxpayer funds are being used to promote and enable elephant trophy hunting.

- CAMPFIRE advocates the resumption of the international ivory trade (see Appendix II). The ivory trade caused the continental African elephant population to plummet by more than 50% between 1979 and 1989. In 1989, the ivory trade was banned by the Parties to the Convention on International Trade in Endangered Species of Wild Fauna and Flora. The U.S. has opposed the resumption of the ivory trade since 1989. Yet, through USAID, taxpayer funds are being used by CAMPFIRE implementing agencies to lobby for resumption of the ivory trade, in opposition to U.S. policy.

- CAMPFIRE has lobbied to weaken the U.S. Endangered Species Act to make it easier for endangered and threatened species to be imported to the U.S. for commercial and other purposes (see Appendix III). CAMPFIRE implementing agencies have misused taxpayer dollars to facilitate this lobbying.

- CAMPFIRE is environmentally unsound (see Appendix IV). The methodology used to monitor wildlife populations is questionable, and there is a lack of quantitative assessment of the potential impacts on wildlife resulting from the project. More mature male elephants are being killed on CAMPFIRE lands than can be sustained by the population.

- CAMPFIRE implementing agencies, notably the Zimbabwe Department of National Parks and Wild Life Management as well as the Campfire Districts, are plagued by corruption and mismanagement (see Appendix V).

- CAMPFIRE funds have been poorly managed by USAID/Zimbabwe which, according to a USAID auditor, did not always ensure that project commodities were properly accounted for and used as intended (see Appendix VI). As a result, commodities valued at about $470,000 were not used effectively.

- CAMPFIRE provides more financial benefits to the implementing agencies than it does rural villagers (see Appendix VII).

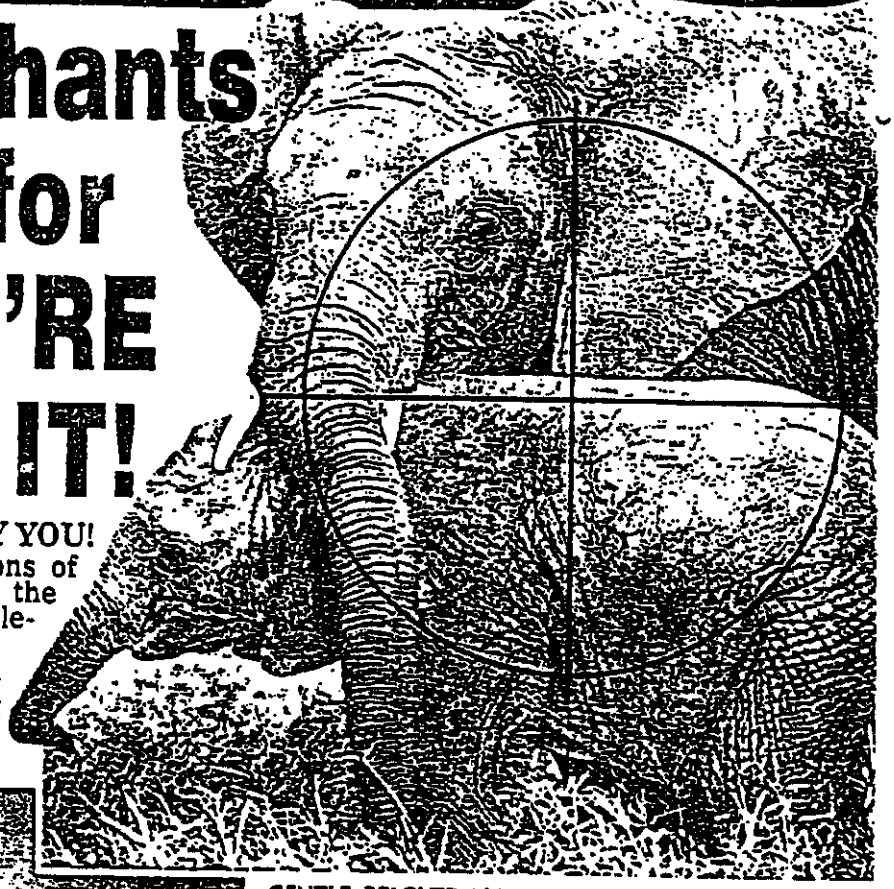
- CAMPFIRE is not socio-economically sound and has not successfully involved local people in wildlife management (see Appendix VIII). CAMPFIRE is driven from the top-down by the Zimbabwe government and the implementing agencies, not from the villagers themselves. A consulting firm, hired by USAID to provide a mid-term evaluation of the program, said that such an approach is subject to collapse once donor funding is withdrawn.

- CAMPFIRE is a waste of taxpayer dollars. Since 1989, USAID has invested approximately $7 million dollars in trying to make CAMPFIRE work. For every taxpayer dollar USAID has spent on CAMPFIRE, CAMPFIRE itself has earned only 52 cents, of which only five cents reached village households (Appendix IX) . With no hope for self-sufficiency, and with villagers receiving comparatively little financial benefit from the program, CAMPFIRE is a waste of taxpayer dollars.

- One CAMPFIRE implementing agency, Africa Resources Trust, has been granted approximately $600,000 per year in American taxpayer dollars by USAID to open offices in several important capital cities around the world, including in Washington DC,

ELP END THIS OUTRAGE!

nocent elephants aughtered for n — & YOU'RE AYING FOR IT!



GENTLE, BELOVED African elephant is a threatened species.

cruelty beyond belief . . . PAID FOR BY YOU!

tless bureaucrats are forking over millions of ax dollars to organizations that promote the and bloody trophy hunting of African ele-, a beloved and threatened species.

dibly, the U.S. Agency for International Develop-USAID) is handing this fortune to pro-hunting that are also lobbying to overturn the interna-an on the sale of ivory — which would lead to olesale slaughter of tle beasts.

n atrocity!" fumed new-d U.S. Sen. Wayne Al--Colo.), the only veter-in the Senate.

trageous that taxes paid cans, who almost univer-re the elephant, should be bureaucrats on such a

lious and brutal."

ately, you can assist Sena-l in his quest to stop fund-is vicious purpose — by ut and mailing The ER coupon at right.

JSAID has given about $10 o African-ganizations rnments to at hunters lands for safaris. pping $20 ore of U.S. ey will be them over our years. t for an el-s usually d sickening, says Dr. lecky, a zoologist and l with the Humane the U.S.

one recent hunt, a sportsman shot a arrow into an ele-belly. The animal n pain and loped off ush.

of putting the ani-mal out of its misery — a fundamental rule of hunting — the "sportsman" returned to his luxurious camp for refreshments.

Later, the hunter found the bloodied beast nursing its wounds. He quickly fired another arrow into its chest.

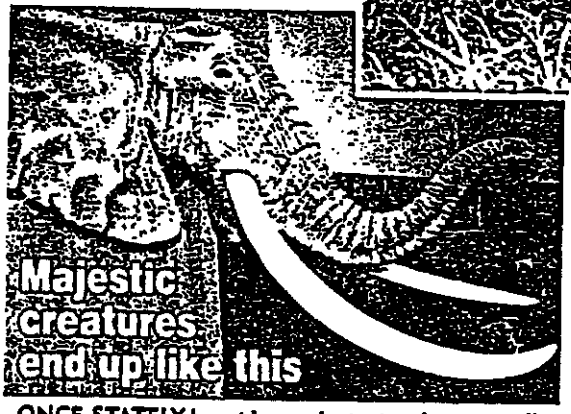
As the dying animal shrieked in terror, three more arrows ripped into its flesh.

The majestic creature toppled to the ground. Another rich hunter had satisfied his blood lust and got a trophy to show his friends. It cost him roughly $60,000.

The pro-hunting African organizations receiving Uncle Sam's dollars say the hunts provide funds for local villagers. But Dr. Telecky says very little of the money reaches those who need it. Instead, it goes to support the organizations' bureaucracies and to their lobbying and promotion efforts.

If the U.S. government really wants to help poor Africans, observed Dr. Telecky, "it could just donate the money directly to the villages."

— WILLIAM BARNHILL



ONCE-STATELY beast is now just a trophy on a wall.

U.S. Senator Wayne Allard is asking you to join the fight against this "atrocity."

Here's what you can do

Here's how you can help stop the slaughter of these innocent creatures.

Says Sen. Allard: "When Congress reconvenes in January, I plan to fight for an end to this program."

And he needs your completed coupon to demonstrate the public is behind him.

"Please join me in the fight by filling out the coupon below," said Allard. "Demand that Congress put an end to the taxpayer-subsidized slaughter of elephants."

Complete, then clip and mail this coupon to: Save the Elephants, c/o National Enquirer, Lantana, Fla. 33464.

To the U.S. Congress:

ENQUIRER READER POWER

I am appalled that millions in tax dollars are being spent by the U.S. Agency for International Development to promote the cruel trophy hunting of innocent African elephants. I want Congress to act swiftly to stop funding this senseless slaughter.

Name _____

Address _____

City, State, Zip _____

Phone _____

Comments _____

The National Enquirer Dec 96

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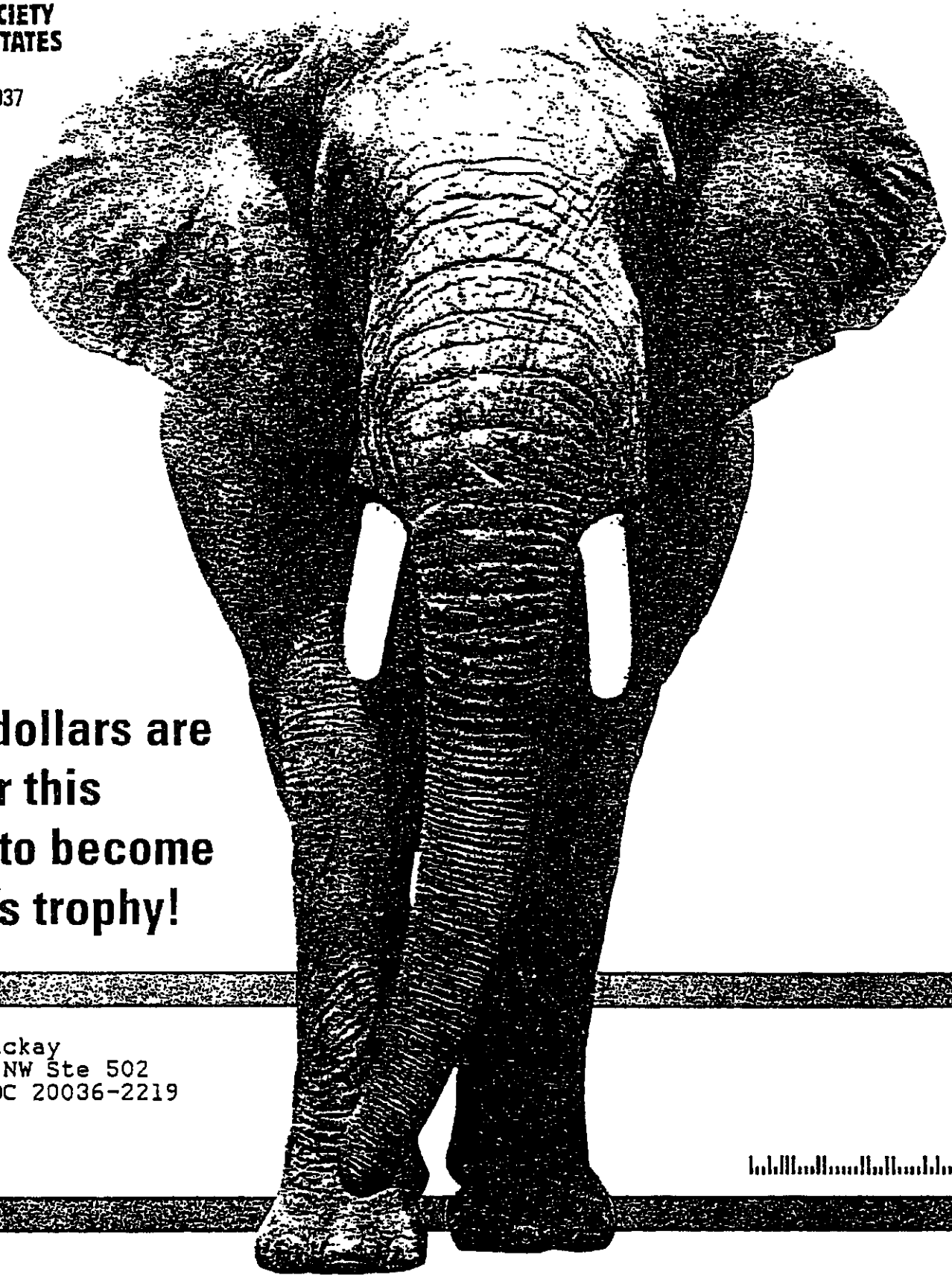

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auren Mackay
16th St NW Ste 502
ngton, DC 20036-2219

Anti Elephant Trophy Hunting Petition Enclos for Ms. Mackay

The United States can't lead the world in conservation efforts and encourage the killing of elephants. Help stop this hypocrisy!

Ms. Lauren Mackay
1400 16th St NW Ste 502
Washington, DC 20036-2219

Dear Ms. Mackay,

Consider the magnificence of this great animal, the sheer majesty of his very presence.

Then imagine a hunter, stalking by vehicle, then crouching in the underbrush, coldly taking aim, and firing his high-powered rifle... once, maybe several times.

The mighty beast screams in anguish, then staggers, bleeding from his wounds, and falls to the ground with a tremendous crash.

Using your tax dollars to promote elephant killing is an outrage! We must stop it. NOW!

The hunter and his helpers approach and, after celebrating their "success" and taking pictures, start to hack away at this once-great animal, sawing his ivory tusks off, or his majestic head, to serve as a trophy.

Sickening, isn't it?

But there is more. Imagine that this horrible scene is taking place...

...and you are paying the bill.

Ms. Mackay, as difficult as it may be to believe, this is not a scene in some 1950's movie. It's real. Painfully, frighteningly real ... and your tax dollars make it possible!

I'm telling you this not to make you sick, but to make you

safaris and a handful of officials who skim off the rest of the money!

Even if the "idealistic" goals of this program were legitimate and attainable, it would still be inexcusable.

Why not simply take the same $20 million, use it to develop programs that don't involve the killing of animals, and distribute it directly among the villages where it is most desperately needed for food, water, and medical care?

Instead, it is spent on a misguided program that could lead to the ultimate extinction of one of the most cherished species of animals on this planet!

Putting an end to this travesty is one of our highest priorities at The Humane Society of the United States.

And I'm appealing to you, today, as one of our most important and loyal HSUS members, to help us do just that.

There are several things I'm asking you to do.

In this mailing, you'll find a Petition addressed to President Bill Clinton and Vice President Al Gore.

It reminds each of these two Administration leaders of their professed commitment to protect animals and the environment.

I'm asking you to sign that Petition and and return it to me today, so we can demonstrate without the slightest doubt, how strongly the American people feel about this issue. We intend to deliver your Petition to President Clinton, soon, along with those received from other HSUS supporters.

I firmly believe that our Petition to the President and Vice President makes it clear the continuation -- much less expansion!! -- of this program will not be tolerated!

So no matter what else you may do after reading this letter, PLEASE return your signed Petition.

(By adding your Petition to those from other caring HSUS friends, and delivering them all at once, we can achieve far greater impact than if delivered separately.)

The urgency could not be more apparent. The more we are delayed in ending this horrible and destructive program, the

WHAT THE EXPERTS SAY ABOUT CAMPFIRE, ITS SISTER PROGRAMS, AND USAID FUNDING

"..... everything I know about the CAMPFIRE programme tells me that it is world class. Its strategy for the sustainable harvesting of elephant populations for the benefit of both the elephants and local people has my full support, and that of my colleagues in conservation biology ..... even the most casual analysis tells one that, in the case of the elephants, the CAMPFIRE programme is on the right side and the HSUS is on the wrong side". Paul Ehrlich, Stanford University.

"By allowing people to derive a direct economic benefit through the sustainable utilization of their own resources, the dependence on foreign aid is broken. ..... CAMPFIRE has helped establish that environmental protection and wildlife conservation can help to improve, and are indeed essential to improving, the quality of human life. Therefore in the interest of wildlife, the environment, and people, we urge you not only to maintain your support for CAMPFIRE, but to help expand programs like it in the future". Barbara Bramble, National Wildlife Federation

"The only way to save wildlife and wildlands, especially in poverty ridden areas, is to provide human beings with incentives to save nature. Most conservationists have come to accept this. Those who oppose it have yet to come up with an alternative that works. We sincerely hope that as CAMPFIRE matures, certain changes will occur. But to cut the AID funding to CAMPFIRE, will only engender more human poverty and suffering as well as enormous losses of African wildlife and habitat". Mike Wright, African Wildlife Foundation

"By working with people on communal lands to take marginal agricultural and grazing lands and turn them to economically productive use, CAMPFIRE attempts to provide people at the local level a better livelihood. Furthermore, by providing land for wildlife outside of reserves and national parks, CAMPFIRE and its sister programs in other countries produce a real conservation benefit." John Robinson, Wildlife Conservation Society

"I applaud USAID's support of community based natural resource management programs in Africa, as these programs are vital to conservation of biodiversity. I strongly encourage you to continue to fund these important conservation initiatives". Dr George Rabb, Chicago Zoological Society

"Community-based management of natural resources....is proving to be effective in both substantially improving the quality of the lives of the people....and in providing strong incentives for the rural people to conserve the resources..... I applaud USAID's investment in rural community management of renewable natural resources in Africa and strongly endorse continuation of your funding for these important initiatives". David McDowell, IUCN - The World Conservation Union

"Through the NRM program, USAID has become a world leader in supporting innovative efforts to understand the complex relationship between conservation and development. Conservationists recognize that without incentives for humans to conserve wildlife and their habitats, animals and the environment will lose. In the interests of wildlife and the people of southern africa, the regional NRM Program deserves continued support". James Leape, World Wildlife Fund

"CAMPFIRE is an organization that proves that humans and wildlife can coexist and flourish. ..... CAMPFIRE not only reflects the basic tenets of the United States' wildlife policies, but exemplifies the highest goals and successes possible through America's involvement in foreign developments. CAMPFIRE deserves our continued national support, admiration and respect". Robert Easterbrook, Safari Club International

A response by the CAMPFIRE Collaborative Group (CCG) to the Humane Society of the United States pamphlet 'CAMPFIRE: A Close Look at the Costs and Consequences'

A close look at the facts and fiction behind the HSUS 'Anti-CAMPFIRE Campaign'

For more information about the CCG and what is *really* happening in CAMPFIRE, contact: The CAMPFIRE Association, Mukuvisi Woodlands, PO Box 661, Harare. Tel.: 747152, 747436; Fax: 795150.

aim of establishing a sustainable community based programme. The NGOs involved provide cost-effective capaciy building services to CAMPFIRE communities to enable them to manage their wildlife sustainably. To suggest donor funds should go directly to local people is naive in the extreme. Simply giving people a handout perpetuates the vicious cycle of dependence. **CAMPFIRE enables people to break away from this dependency through the establishment of sustainable production systems which enable them to generate their own revenue and determine their own futures.**

HSUS CLAIMS: One CAMPFIRE implementing agency, Africa Resources Trust (ART), uses USAID funds to undertake 'anti-environmental' activities in the US.
Whilst ART does have an office in the US this is not funded by USAID nor do the activities undertaken there or elsewhere by ART resemble those claimed by HSUS. The accusation that ART is part of 'the wise-use, anti-environment movement' comes as no surprise given that HSUS characterises WWF and IUCN as being part of 'a new generation of big game hunters and traffickers in wildlife'. **HSUS is attacking ART for working in partnership with the leading global environmental agencies and for advocating the principles of the Convention on Biological Diversity (CBD)!**

HSUS CLAIMS: CAMPFIRE is riddled with corruption.
This very serious accusation is made with only the flimsiest of 'evidence' comprising a few newspaper articles. HSUS is aware that in most of these cases, subsequent reports and findings have led to these accusations being dropped. For example, investigations by both USAID and the government of allegations that CAMPFIRE funds were misused in Nyaminyami have shown these to be false. **HSUS has been invited by the government to present any evidence of corruption so that this can be fully investigated, but it has failed to respond.**

HSUS CLAIMS: CAMPFIRE has misused USAID funds to undertake illegal lobbying of the US Congress to weaken the US Endangered Species Act.
This allegation led to a comprehensive review of the activities of the CAMPFIRE implementors by the USAID office of the General Counsel. **The review concluded that 'the allegations did not disclose any existence of a violation of the lobbying restrictions'.** Despite having been informed of this finding, HSUS continues to make this spurious claim.

HSUS CLAIMS: CAMPFIRE advocates the resumption of the ivory trade in opposition to US policy.
Several members of the CCG believe that it is important for the international community to examine the possibilities for the reintroduction of a well-regulated trade in elephant products. **This is a position strongly supported by a range of conservation and development arguments, not least of which is that CAMPFIRE communities own elephant products which represent a large and moribund asset to some of the poorest communities in the world.** The implication that CAMPFIRE has used USAID funds to undertake lobbying to reopen the ivory trade is wrong.

The CCG believes that HSUS has every right to maintain its animal rights philosophy even if this is at odds with mainstream conservation and development approaches endorsed by the CBD (also subject to numerous attacks by HSUS). However, it should not have the right to impose its protectionist philosophy through unethical methods involving a smoke screen of false claims and accusations and the misrepresentation or omission of documented information.

Briefing on 'anti-CAMPFIRE' campaign in the USA

Background

Over the last 8 years the Humane Society of the US (HSUS), in conjunction with other animal rights organisations, have been involved in a campaign to discredit the concept of sustainable use of natural resources as endorsed by the Convention on Biological Diversity (CBD). This has arisen from a deep-seated ethical divide between the 'animal rights' philosophy and contemporary practices in conservation and development. One notable aspect of this campaign has been an attempt to discredit the conservation and development policies of Zimbabwe (see Appendix 1, 'A Brief History of the HSUS Campaign Against the Concept of Sustainable Use and Zimbabwe's Conservation Policies', for details). More specifically, over the last year this has focused on attempts to disrupt and discredit CAMPFIRE.

HSUS have three objectives:

- prevent the down listing of the elephant at CITES.
- disrupt USAID funding of CAMPFIRE and similar CBNRM programmes
- discredit the concept of sustainable use and CBNRM

Having been unsuccessful in achieving their first objective they are now concentrating on securing the others.

HSUS strategy and activities

The activities of HSUS have been focused in the USA, where they have targeted the media, the US Congress and Administration, conservation and development NGOs and potential donors. **Whilst the campaign is ostensibly targeted at CAMPFIRE, it has implications for all AID funded NRM programmes in Africa, affecting approximately US$70 million of development assistance to the region.** The campaign is characterized by the presentation of information that is frequently wrong, misleading and incomplete, as clearly illustrated in the CCG pamphlet 'A close look at the facts and fiction behind the HSUS 'anti-CAMPFIRE campaign' (see appendix 2).

HSUS are notorious for choosing one key campaigning issue every two years which they put the full force of their large and well funded ($36 million annually) organisation behind. This is also their primary fundraiser. CAMPFIRE has become this issue and a conservative estimate indicates that they have spent approx. $ 6-8 million on their campaign to date. They will of course be confident of recouping these costs through their fundraising campaign to 'save the elephant', (see appendix 3). **The general consensus amongst many in the US is that this is perhaps the largest 'animal rights conservation' campaign that has been witnessed to date.**

HSUS initially made 10 detailed accusations against CAMPFIRE, these can be summarised as follows:

1. CAMPFIRE subsidizes trophy hunting and promotes the resumption of the ivory trade using US taxpayer funds which threatens the extermination of the elephant.
2. CAMPFIRE and ART used tax payer funds to illegally lobby the US Congress on the ESA and CITES for resumption of the international commercial ivory trade.
3. 98% of USAID funds do not reach CAMPFIRE communities.
4. CAMPFIRE is not socially, ecologically or economically sustainable.

and the southern African Embassies have been able to coordinate the appropriate response from the appropriate quarter to much of the HSUS campaign, effectively counteracting what they have done.

The majority of efforts have been focused on the Congressional campaign to prevent the passage of amendments which would have eliminated the use of USAID funding. In this regard the impact of the HSUS campaign cannot be overstated. When it is considered that in US Congressional terms CAMPFIRE is an 'obscure' African development programme, with no budgetary significance and little political significance, it is extraordinary that we are now faced with a situation where **CAMPFIRE is known to every US Representative and will be debated at length on the floor of the House and Senate.**

The HSUS Congressional campaign has been effectively addressed through

- the organisation of a core group of members of Congress to support CAMPFIRE, enabling;
  - the establishment of an 'early warning system';
  - access to other Congressional offices; and
  - ensuring a cohesive and standard message be advocated
- the development of action plans to counter HSUS's activities on Capitol Hill, including;
  - development of and distribution of informational materials
  - 'Dear colleague' letters (see appendix 7, A-D)
  - Preparation of briefings and floor statements for Members
- coordination with NGOs, academics and embassies to deliver message
- briefings for and coordination of media to 'sensitize' congress
- development and distribution of legal arguments against the amendments.

The advise and assistance of the southern African Embassy lawyers, Bracewell and Patterson, has been essential in the successful Congressional campaign. Bracewell and Patterson are currently involved in a dialogue with HSUS with regards to potential legal action that various southern African organisations may take against them.

ART informational activities have also forced HSUS to dramatically alter their initial claims against CAMPFIRE, with their current accusations being confined to:

- CAMPFIRE supports trophy hunting and ivory trade using tax payers money
- US foreign aid should not be used to support consumptive use programmes.

Current status and long term impact
Strong bi-partisan support has been secured for CAMPFIRE and it is highly unlikely that the Fox/Miller appropriations amendment to disrupt funding that will be offered in early September will be successful (see appendix 8).

The long term impact of the HSUS campaign may well prove to be of great benefit to Southern Africas CBNRM initiatives, particularly CAMPFIRE, for a variety of reasons, including the following:

- the campaign has resulted in high level of awareness and understanding of CBNRM in the US that we could not have hoped to achieve 'unaided'
- a core group of Congressmen has emerged that are prepared to actively promote US

Capital Notebook

Hunting the Elephant in AID's Budget

By Guy Gugliotta
Washington Post Staff Writer

Elephants are pretty neat. They're really big. They pick up stuff with their noses. They do fantastic tricks in the circus. Disney made a movie about one. Republicans love them.

Elephants are not as neat, however, when they're running wild in the neighborhood and break dancing in your cornfield. They've never heard of the macarena, and scarecrows don't work.

Elephants, said the Agency for International Development's Tony Prior, "take up a lot of ecological space."

Prior is AID's natural resources policy adviser for Africa and, among other things, oversees a $28 million investment in a project to help Zimbabwe improve the lot of rural people's living in elephant country.

Several years ago, the project ran afoul of the Humane Society of the United States, which makes the point—not denied by AID—that what rural people living in elephant country like best is to issue licenses so rich foreigners can come into the neighborhood and shoot elephants.

This is worth anywhere from $20,000 to $50,000 a pop, which can buy a lot of economic development in a drought-ridden southern African nation, and if it happens often enough, the cornfield problem is solved.

Unfortunately, notes the Humane Society, the African elephant is a "threatened" species under the U.S. Endangered Species Act and therefore not to be hunted. AID's program "is at odds with fundamental American values," said Teresa Telecky, director of the Humane Society's wildlife trade programs. "We don't give money for something we don't do here."

The Humane Society has never liked this project but has become more upset recently because AID is expanding it. AID spent $7 million in three Zimbabwean districts between 1989 and 1996 and now proposes to spend the rest (more than $20 million) in 23 districts between 1997 and 1999.

"The first part was a pilot for the very driest districts," Prior said. "The next phase is to mainstream." He carefully notes, however, that "this" is not just shooting elephants. "This is a resource management project, not a wildlife project."

Maybe so, but maybe not.

At this point, AID and the Humane Society pretty much agree on mechanics—but not on outcomes. AID thinks it is demonstrating to Zimbabweans that a properly managed environment is a renewable and lucrative resource. The Humane Society thinks AID is simply giving Zimbabweans an excuse to kill elephants.

AID dedicated $28 million to the project in 1989, the year when 130 nations overwhelmingly approved a ban on international trade in ivory. Hunting and poaching had halved Africa's elephant population to 600,000 during the previous decade.

AID contributes its money to the Zimbabwe government's Communal Areas Management Programme for Indigenous Resources (CAMPFIRE), which puts local people in charge of managing their own natural resources.

According to Prior, CAMPFIRE's goal is to get people to see wildlife and the environment as income sources from ecotourism, photo safaris and, yes, trophy hunting. "We want to make maintaining the wildlife population a matter of self-interest," Prior said.

An AID blurb brags that poaching in Zimbabwe has gone into "dramatic decline" since AID started contributing to CAMPFIRE, and that the country's elephant population has risen from 50,000 to 65,000.

The Humane Society suggests, however, that the ivory ban is what's helping the population—no ivory market, no poaching. One of the things that has the society going bonkers is that Zimbabwe has joined a minority of African nations calling for a lifting of the ban.

The AID blurb also acknowledges that 90 percent of CAMPFIRE revenue in 1995 came from hunting licenses, which, the Humane Society additionally points out, doesn't say much for photo safaris and camping.

And the Humane Society also quotes unflattering passages from an independent study of CAMPFIRE contracted by AID in 1995: District councils have ignored program directives, failed to invest revenue in village projects and taught people nothing about wildlife management, the study said.

"The result has been ignorance or hostility to the CAMPFIRE program," the study added, and "mistrust of councils, increasing intolerance of wildlife and a continued lack of communal environmental controls."

Prior does not apologize. Environmental projects take time to mature, he said, and AID is trying "to put in place the conditions for long-term change." Elephant hunting is not the problem, not with the threat of "30,000 elephants dying from drought."

WP 2/12/97

CEI Update

Save Elephants - Buy Ivory

Michael De Alessi
August 1997

This message has been muffled for quite sometime, but it was trumpeted loud and clear at the close of the 10th meeting of the Convention on International Trade in Endangered Species (CITES) in Harare.

The decisive moment came on June 19 when proposals by Botswana, Namibia and Zimbabwe for a limited resumption of the ivory trade passed with the required two-thirds majority, despite strong opposition from the U.S. and some European delegations. With the tally of the last vote, many Africans in the auditorium broke into song, while dejected animal rights advocates tried to come to terms with a rare CITES defeat.

They had better get used to it. This vote is just the beginning of a sea change in the way that the developed world manages its resources.

For the first time in recent CITES memory, countries like the U.S. and the United Kingdom and their shrill, preservationist allies did not carry the day. These countries were influential in the 1989 CITES decision to ban the ivory trade. They claimed that devaluing elephants was the way to save them and promised to make up lost revenues with donor aid. But over the last eight years, many countries, particularly developing nations, have come to understand the insidious nature of these protectionist approaches to conservation.

Delegates from some these countries expressed their concerns on the floor of the meeting that these measures were simply attempts to turn their countries into "natural history museums" for wealthy environmentalists and that foreign aid only served to keep them "poor and mendicant."

The greatest threats to elephants is habitat loss. Making them less valuable may discourage some poaching, but by encouraging habitat destruction, this devaluation has surely harmed elephant populations. Countries like Zimbabwe with its CAMPFIRE program are realizing that the greatest incentive to protect habitat comes from allowing local people to benefit from the wildlife that surrounds them. In this case, devaluing elephants only means less effort will be put into providing space for them.

The resulting vote on a limited trade in ivory is indicative of a dramatic shift taking place on the international conservation scene. The consensus on wildlife conservation is shifting, and developing countries are finally beginning to work together to push for sustainable utilization of wildlife resources to both benefit and empower impoverished communities and nations.

Of course, CITES still has a long way to go. Norway proposed trade in its minke whale stocks, Cuba in hawksbill sea turtles, and Japan in both minke and gray whale populations. Each failed, in spite of evidence that none of these species are endangered. The Norwegian and Cuban proposals came close -- majority support,

THE LIBERTARIAN PARTY

The Party of Principle

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NEWS FROM THE LIBERTARIAN PARTY
2600 Virginia Avenue, NW, Suite 100
Washington DC 20037
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For release: July 22, 1997
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For additional information:
George Getz, Deputy Director of Communications
Phone: (202) 333-0008 Ext. 222
E-Mail: 76214.3676@CompuServe.com
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Libertarians demand: Congress should kill program that subsidizes the slaughter of African elephants

WASHINGTON, DC -- Hundreds of majestic African elephants are being killed every year by trophy hunters -- and U.S. tax dollars are helping to pay for the slaughter.

"This is an outrage that must be stopped," said Steve Dasbach, national chairman of the Libertarian Party. "Congress has already spent millions to promote this wildlife butchery, and if we don't stop the politicians, they're going to spend $21 million more."

The U.S. House could decide as early as Tuesday whether to continue funding CAMPFIRE -- a foreign aid program that funnels money to Zimbabwe to promote big game hunting.

The CAMPFIRE program (Communal Areas Management Program for Indigenous Resources) subsidizes the hunting of elephants -- as well as leopards, lions, baboons, hippos, and zebras.

"Your tax dollars are being turned into the bullets that are killing these magnificent animals," said Dasbach. "That's why the Libertarian Party has joined with the Humane Society of the United States to oppose the program -- and demand that CAMPFIRE be doused. We need to stop the politicians before they kill again."

Congress already has funneled $7 million into this program through the U.S. Agency for International Development, and the agency is now requesting $21 million more -- despite the fact that elephants are considered an endangered species, and 29 African nations have outlawed elephant hunting.

The CAMPFIRE program uses American taxpayers' money to pay for advertising to lure wealthy European "trophy" hunters to Zimbabwe, where they spend up to $30,000 for a license to kill a bull elephant.

"Critics of foreign aid, take note: Politicians are using your tax money to persuade wealthy Europeans to go on an elephant-hunting safari in Africa," Dasbach said. "How can they justify that? How can a single American benefit from this?"

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The Namibian

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Animal rights activists peddling 'junk science'

December 18, 1997
by Absalom Shigwedha

Windhoek - Wildlife organisations have dismissed claims that the poaching of elephants has increased in the wake of the decision by the Convention on International Trade in Endangered Species (Cites) to allow limited trade in ivory.

Both the Wildlife and Environment Society (WES) of South Africa and Zimbabwe's Africa Resources Trust (ZART) say they have been closely monitoring the effects of the Cites decision, and that there has been no measurable increase in elephant poaching so far.

At its 10th conference in Harare in June, Cites decided to downlist the African elephant to its appendix two, which allows for limited trade in ivory.

Dr Bruce Davidson, who is a board member of WES, said his organisation was extremely surprised to see reports in the media to the effect that poaching levels had escalated since the Cites decision in June.

"With our partners we have been investigating every (poaching) claim of which we have been made aware, many of which are at best only anecdotal, and it appears that poaching levels may prove to be lower than they were before Cites," Dr Davidson said.

According to Davidson, the biggest threat to the elephant at the moment was animal activist groups and their "irresponsible reporting".

"By falsely proclaiming world-wide that there is a renewed ivory trade and that there was once more an incentive to poach elephants, they are making it much more likely that elephant will indeed come under pressure from Africa's rural poor," he argued.

June 20, 1997

U.N. wildlife panel eases ban on ivory sales

By PAUL ALEXANDER Associated Press Writer

HARARE, Zimbabwe -- A U.N. wildlife panel eased the worldwide ban on ivory Thursday, allowing three African countries to sell 59 tons of stockpiled elephant tusks to Japan. Supporters burst into a chorus of "God Bless Africa."

Backers saw the decision as a victory for self-determination and a reward for the conservation efforts of Botswana, Namibia and Zimbabwe since the ban took effect 7 1/2 years ago.

"This is a triumph for sanity, objectivity and for recognizing developing countries' ability to take their own decisions on natural resource management," said Dick Pitman of the Zambezi Society of Zimbabwe. "It's a major, major achievement."

Ivory trade supporters cheered and sang when the results were announced; animal rights activists sat in glum silence. They said any relaxation would spark resumed elephant slaughters by poachers.

"It sends a strong signals to poachers across Africa that it's a good time to start killing elephants again," said Isabel McCrea of Greenpeace.

The first of three secret ballots on proposals by the three countries cleared the 138-nation U.N. Convention on Trade in Endangered Species on a 74-21 vote, with 24 abstentions.

The other two passed by almost identical margins -- well over the two-thirds majority required to downgrade the protection afforded the elephants under international law.

The proposals had been rejected Tuesday, but a committee was then set up to amend them to ensure illegal ivory is not mixed in with legal shipments.

The ivory sale can go ahead in 18 months, if promised controls are deemed in place by then. Botswana, Namibia and Zimbabwe wanted to sell combined ivory stocks of more than 150 tons to Japan but agreed to the smaller amount.

Western countries have strongly opposed lifting restrictions on ivory but some developing countries say they have more elephants than their land can support.

Don Barry, head of the U.S. delegation, said he voted against the proposals but would cooperate with the three countries to ensure trade is properly managed.

"For the sake of the African elephant, we can't afford to fail," he said.

Ginette Hemley, head of the World Wildlife Fund delegation, said the issue might not have gone this far if Western countries had come up with promised

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Groups Assail U.S. Funding of Zimbabwe's CAMPFIRE Program

Animal rights organization in the United States have launched an aggressive campaign against US funding of Zimbabwe's CAMPFIRE program.

CAMPFIRE (an acronym for "Communal Areas Management Programme for Indigenous Resources") is a rural development program that shifts authority for wildlife management to local districts and communities, especially those near parks and on marginal agricultural lands. The program, first implemented in 1989 in remote regions of northern Zimbabwe, provides villagers with opportunities to generate revenue through various wildlife-related industries. About 90% of the revenues generated by CAMPFIRE districts in 1995 were derived from leasing sport hunting concessions to commercial safari operators, according to the US Agency for International Development (USAID).

The Humane Society of the United States (HSUS) is leading the anti-CAMPFIRE effort. It will soon release a new document entitled, "Ten Reasons Why U.S. Funding for CAMPFIRE Should Stop."

"CAMPFIRE is far from the social and conservation panacea it is proclaimed to be by those involved in the project. Indeed, it is a failure in many important areas and a waste of American taxpayer dollars," declares a draft of the HSUS document.

Between 1989 and 1994, USAID contributed $7.6 million to the CAMPFIRE program. USAID will contribute an additional $20.5 million through 1999.

"How can CAMPFIRE ever be economically sustainable when it is so heavily subsidized?" asks Teresa Telecky, Director of HSUS's Wildlife Trade Program.

In its forthcoming document, the Humane Society alleges that some of the organizations that implement CAMPFIRE may be using USAID money to lobby against the existing ivory trade ban.

Tony Pryor, a natural resource policy advisor in the Africa Bureau at USAID, denies that any USAID money is being used for that purpose. He told *African Wildlife Update* in late September that "U.S. policy is clear in that regard. USAID funds cannot be used for lobbying. We might not always agree with the lobbying entity of a funded organization. But the entity must keep an airtight seal between the lobbying part and other activities. Keep in mind that CAMPFIRE officials are free to talk about sustainable use and their point of view--that's not lobbying."

In Zimbabwe, the Director of Africa Resources Trust, Jon Hutton, called the HSUS campaign against CAMPFIRE "entirely predictable from an organization that places the value of an animal above that of our impoverished rural people. The Humane Society's new attack, like their previous ones, is full of errors and inaccuracies to such a degree that one has to assume their intention is to mislead. Let's not forget the Humane Society is interested neither in conservation nor people."

According to USAID documents, interest in the CAMPFIRE program is growing in Zimbabwe, with the number of participating households increasing from 9,000 in 1989 to about 103,000 in 1996. Non-hunting tourism to CAMPFIRE Districts is also on the rise, according to USAID, which cites as evidence the development of the Sanyati Bridge Camp in Hurungwe District and "additional development at Mavhuradhona Wilderness Area...,

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Panafrican News Agency

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Rumours Of Poaching Increasing Denied In Harare

December 15, 1997

HARARE, Zimbabwe (PANA) - Conservation authorities in Southern Africa have vehemently denied that six months after being allowed limited sale of elephant tusks, the largest land-based mammal was being threatened by poachers.

Conservationists in Southern Africa Sunday refuted claims that there has been an increase in poaching in the region since the decision by the Convention on International Trade in Endangered species (CITES) to downlist the African elephant in June.

The Zimbabwe Trust and the Wildlife Environment Society of South Africa said in separate statements there had not been any measurable increase in elephant poaching so far while in some areas it had gone down.

At the June conference of parties to CITES, the African elephant was downlisted from appendix I, where trade is banned to appendix II where controlled trade is allowed.

Conditions were set under which Botswana, Namibia and Zimbabwe could resume controlled but strictly limited trade in ivory by 1999 provided there was no increase in poaching activities.

Many animal rights groups, which heavily fought the downlisting, have published materials claiming that there was an increase in poaching activities in the past six months.

In Sunday's denial, Zimbabwe Trust secretary general Rob Monro claimed that TRAFFIC, the official monitor for decisions made by CITES, had not found any evidence of the purported increase in poaching.

"As far as we can see in some places, the rate of poaching actually fell over the past six months...If poaching is going to escalate now, we will be inclined to blame those who claim now

US News and World Report - Nov 25, 1996

WORLD REPORT

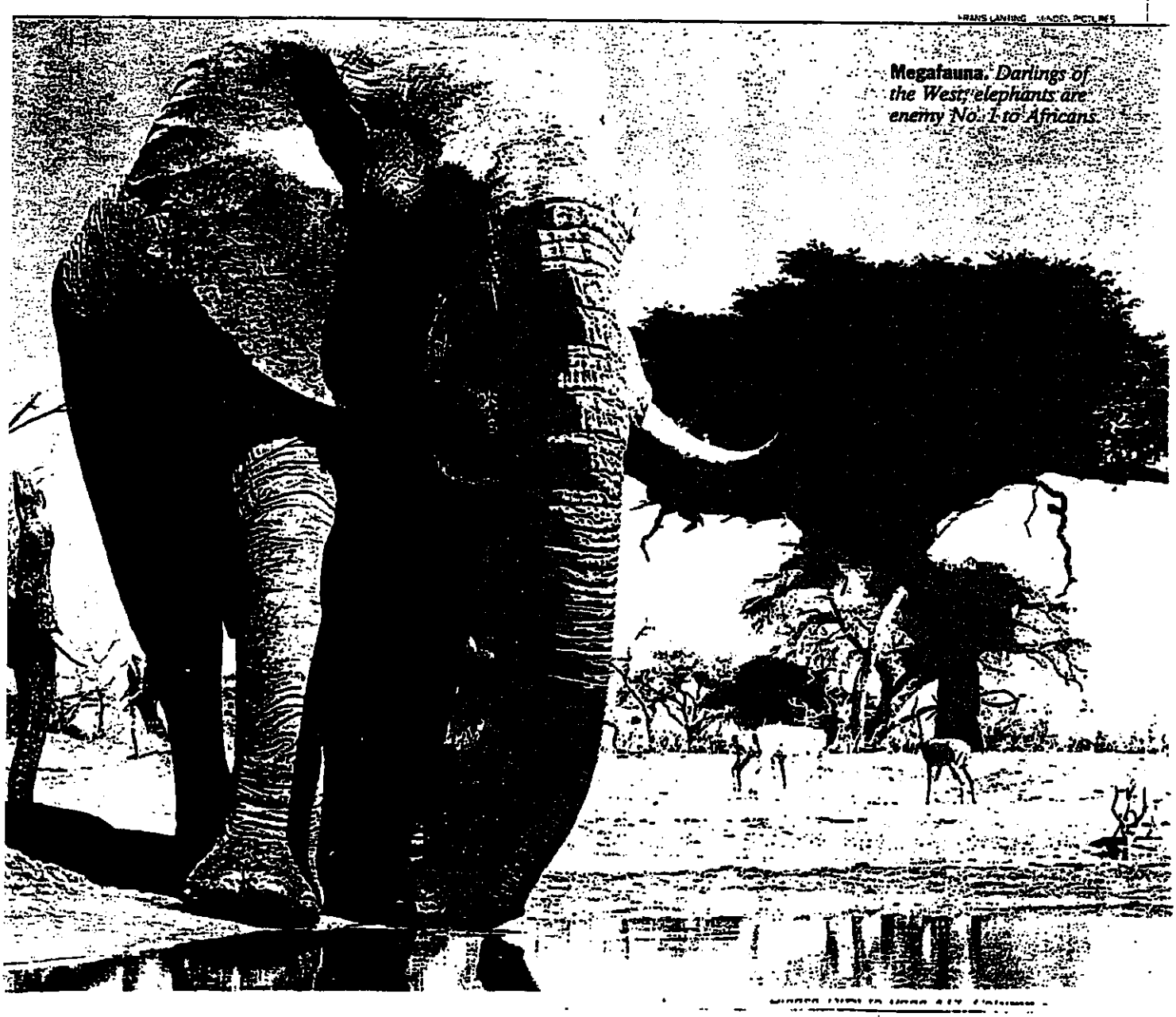
Killing with kindness

Preserving wildlife has been a moral and practical disaster for the developing world. The paradoxical solution: Use it or lose it

Traditional recipe for creating a picture-book African wilderness: Massacre the natives; introduce smallpox to kill off some more; let tsetse fly spread and wipe out the cattle; declare what's left a park; shoot any poachers. An image of teeming wildlands in far-off tropic climes has long seized the imaginations of affluent nature lovers in affluent lands; with the ascendancy of global biodiversity as issue No. 1 on the environmental agenda, safeguarding that image has become a major focus of fund-raising campaigns and legal initiatives.

But it is an image awash in ironies, not least that a land teeming with wildlife, untrammeled by man, is a modern colonial invention—an anachronism created by brutal force and alien to anything nature had known for thousands of years. The famous game parks of Kenya, for one, arose on the centuries-old homelands of the cattle-herding Masai after they were weakened by disease and driven out by colonial law.

As a policy, preservation is a deeply flawed anachronism at that. In parks and reserves around the world, scrupulously



Megafauna. *Darlings of the West, elephants are enemy No. 1 to Africans.*

APPENDIX K

DISTRIBUTION OF CAMPFIRE REVENUES IN RDCS VISITED BY EVALUATION TEAM

Distribution of Wildlife Funds, Examples from Wards Visited by Evaluation Team

There is a great deal a variation on how dividends are distributed within RDCs. In some cases these are distributed to wards, in some cases to villages within wards where animals were killed. We did not see a case where dividends were distributed directly to households. This is now rare, with most people preferring to aggregate their funds at a village or ward level to make possible projects of community interest.

Tayanda Ward Wildlife Project (one of Nyaminyami Wards) (Mala Ward #4)

This wildlife rich district has been plowing its dividends into income generating activities (grinding mills), whose income is expected to reach about 17% of that provided by the wildlife dividends received next year. The ward hopes that their elephant dung paper project, and community store, will further increase this percentage. Expenditures of ward funds are expected to benefit a broad range of community members. (Note: Remember that most dollar figures refer to Zimbabwe Dollars; exchange rate in 1998 was about U$ 1.00 - $15 Zimbabwe).

	Actual 97-98	Projected 98-99
Income:		
Marembera Grinding Mill	$24,780	$36,000
Moyuhi Grinding Mill	$14,690	$24,000
New Grinding Mill		$24,000
Sub-Total	$39,470	$84,000
Ward Dividends (50%)	$353,136	$500,169
Problem Animal Cont.Meat	0	$20,000
Loan (from RDC)	0	$50,000
Ward Tuckshop (groceries)	0	$210,000
Elephant Dung Paper Sales	0	$205,000
Total		$1,153,169 (US$ 76,877)
Expenditures (Planned):		
Pre-Schools	0	NA
Youth Projects	0	
Women's Clubs	0	
Pre-School Tutors	0	
Pre-School Toilets	0	
Drought Relief	0	
Loan Funds	0	
Paper Making Project (Elephant Dung)		
Fencing around Area	0	$15,000
Wages/Salaries		$10,000

Traveling & Subsistence Allowances:	8,000
Sitting Allowances (Meetings):	4,680
Stationary:	1,500
Game Scout Allowances:	6,000
Zunde Ramambo (Festival):	1,500
Independence Celebrations:	2,100
Pre-School Mothers	1,800
Youth Projects	8,000
Casual Wages:	3,000
Game Scout Uniforms:	6,000
Ward Wildlife committee Office:	5,000
Office Equipment:	6,400
Total:	$115,780
Balance:	$1,362.72

Nyaminyami Rural District: Nebire Ward #7

This Ward has a total of 190 households, with some 1,038 people.

A review of their game scout books at the ward level showed that careful attention is given to keeping track of the location and number of animals killed by sport hunters within their ward - the basis upon which their semi-annual paid dividends are paid by the RDC. We learned that:

Between June 10 - December 1997, animals shot were:

Buffalo	6
Impala 7	
Leopards	4
Kudu	2
Bush Buck	2
Baboon	2
Knipspringer	1

Between Jan. 1, and June 1997

Buffalo	5
Elephant	1
Baboon	1
Zebra	1
Impala 2	

Besides this, this ward received 34 culled impala, and 1 buffalo (for which a minimal price (US$ 0.33) was paid per kilogram). The RDC culls the animals and delivers them by truck to the ward

3. Village # 19

1 bushbuck (M)	x 4000	=4000
1 impala (M)	X 1200	=1200
1 wild cat (M)	x 500	=500

Total: 5,700 (US$653)

Total Chipise Ward I: 122,200 (US$ 14,007)

Dite 2

1. Dite Village

2 impala	x 1200	=2400
1 steenbok	x 1200	=1200

Total: 3,600

Mtetengwe Ward 6

1. Mtetengwe/Malala/Makakavhule

1 elephant (M)	x 72000	=72000
4 eland (M)	x 6000	=24000
4 impala (M)	x 1200	=4800
2 duiker (M)	x 1200	=2400
1 wild cat	x 500	=500
1 baboon	x 200	=200

Total: 103,900 (US$ 11,910)

Maramini Ward 8

1. Village #16

1 steenbok	x 1200	=1200
2 crocodile (M)	x 9000	=9000
Total:		19200

2. Maramai Village

1 impala (M)	x 1200	=1200
1 duiker (M)	x 1200	=1200
1 leopard (M)	x 7200	=7200 (as PAC)
1 hyaena (M)	x 4000	=4000
1 jackal	x 500	=500
Total:		14,100

SUMMARY DISTRIBUTION OF 1995 CAMPFIRE REVENUE

Ward	Gross	50% to Ward	15% Levy	35% Dev. Levy
Chipise Ward 1	122,200	61,100	18,330	42,770
Dite	3,600	3,600	-	-
Mtetengwe Ward 6	103,900	51,950	15,585	36,365
Maramani Ward 8	109,000	54,500	16,350	38,150
Machuchuta Ward 9	29,600	14,800	4,440	10,360
Shobi	6,500	6,500	-	-

1995 Safari Hunting Revenue: 446,800 (US$ 51,215)
Less Elephants not harvested: 72,000
Total For 1995 Distribution: 374,800 (US$ 42,962)

Net Distributions of Wildlife Funds Per Ward (1990 - 1994)

	< 1990	1990	1991	1992	1993	1994
Chipise	30,000	44,000	19,202	28,960	20,992	61,100
Dite II	0	0	20,000	29,500	0	3,600
Mtetengwe	0	0	15,000	23,600	38,400	51,950
Masera	5,000	0	0	9,100	0	6,500
Machuchuta	0	0	0	13,800	27,520	14,800
Maramani	5,000	1,000	27,127	53,000	30,848	54,500
SubTotal	40,000	45,000	81,329	157,960	117,760	192,450
RDC	6,000	5,235	18,671	67,040	138,240	183,350

APPENDIX L

ANNOTATED USAID SO1 RESULTS INDICATORS

Appendix L

Table ____

USAID/Z SO 1 Results Indicators

NRM II Results Name	Results Indicator	Data Sources	Year	Planned	Actual	Comments
SO I.A:	Number of Campfire communities with established NRM programs	Campfire Assoc.(CA), Zimbabwe Trust (ZT)	1994			☛No baseline data ☛No specific criteria presented in R4 explaining how the indicator is actually measured. As it is defined, it is a *process*, not a purpose or results - level of measurement. It presumably is scored as CAMPFIRE "graduates", whatever that means. ☛Definition of "community" changed to "wards", whereas earlier strategy statements defines communities as "districts, wards or villages."
			1995			
			1996			
			1997	2	2	
			1998	5		
			1999	15		
			2000	25		

NRM II Results Name	Results Indicator	Data Sources	Year	Planned	Actual	Comments
SO1.B(a)	Value of total CAMPFIRE benefits	CA, WWF	1994			☛This is a proposed indicator ☛This is not a measure of SO1 as it is defined. It is at higher purpose level. ☛Assumes comparable accounting of "benefits" across all communities. ☛1989: Z$ 43,699 (data source not identified) ☛Original indicator assumed 1USD = Z$ 10.07. Exchange rate in March 1998 was 1USD = Z$ 15.4
			1995		Z$ 14,082,032 US$ 1,614,912	
			1996		Z 17,445,801 US 1,732,453	
			1997			
			1998			
			1999			
			2000	US$ 2,400,000		
SO 1.B(b)	Number of households in Campfire communities	CA, WWF	1994			☛This is a proposed indicator ☛1989: 9000 (data source not identified) ☛Total number of CAMPFIRE communities may include some that are not generating CAMPFIRE revenues

NRM II Results Name	Results Indicator	Data Sources	Year	Planned	Actual	Comments
SO 1.D	Status of Natural Resource Base in Campfire Areas	WWF, Dept. Of National Parks and Wild Life Management (DNPWLM), Dept. Of Natural Resources and Forestry Commission	1994			☛1989: "Rapid Habitat Loss and Decreasing Wildlife Numbers" (Measurement methodology not identified) ☛Present indicators are inadequate to determine national trends in the status of the natural resource base. There are ground counts in some locations and aerial surveys in most places for Elephants. There some isolated studies but no nation wide data base.
			1995			
			1996			
			1997		Moderate habitat loss and stable wildlife numbers	
			1998			
			1999			
			2000	Negligible habitat loss and stable wildlife numbers		
SO 1.E (Proposed)	Diversification of Campfire revenue base (%)	CA, WWF	1994		5.5	☛This is a proposed indicator ☛1989: 6.6 % (data source not identified) ☛This is not a measure of SO1 as it is defined. It is at a higher purpose level
			1995		7.1	
			1996		8.8	
			1997	9.5		
			1998			

NRM II Results Name	Results Indicator	Data Sources	Year	Planned	Actual	Comments
IR 3.0	Rural land pressure reduced. (Persons per sq. Mile)	Central Statistics Office, Rural District Councils	1994			☛ CAMPFIRE cannot be posited as a cause of population density. Indicator is limited to being a descriptor of the CAMPFIRE community. Does not fit the strategy at either the IR or SO level. It is (possibly) a mediating factor.
			1995			
			1996			
			1997			
			1998			
			1999			
			2000	TBD		

Source: March 1998 USAID R4 Draft

APPENDIX M

DETAILED PRESENTATION OF CAMPFIRE HUNT DATABASE

Table 1. Summary of quotas, # reported hunted, US$ Fee paid to RDC, mean trophy value and standard deviations, and % of hunted animals reported for selected species hunted in Zimbabwe 1994-1996 based on hunter reports supplied to WWF and incorporated into their HUNT Database.

NATIONAL SUMMARY															
			1994					1995					1996		
SPECIES - SEX	*QUOTA*	*# REPORTED*	*US$ FEE*	*TROPHY MEAN*	*TROPHY S.D.*	*QUOTA*	*# REPORTED*	*US$ FEE*	*TROPHY MEAN*	*TROPHY S.D*	*QUOTA*	*# REPORTED*	*US$ FEE*	*TROPHY MEAN*	*TROPHY S.D.*
ELEPHANT MALE	142	76	382,345	1=30.3	23	156	102	430,354	1=26.19	21	159	71	1,140,660	1=22.76	21.6
ELEPHANT FEMALE	146	9	n=89	2=1.11	4.2	185	25	n=148	2=1.65	5	88	28	n=102	2=1.48	4.75
% REPORTED		**29.5%**					**37.2%**					**40.1%**			
BUFFALO MALE	409	200	158,852	18.74	23	407	337	301,834	26.29	26	418	205	226,843	33.09	13.7
BUFFALO FEMALE	137	47	n=248			139	71	n=412			126	52	n=264		
% REPORTED		**45.2%**					**74.7%**					**47.2%**			
LION MALE	63	14	19,350	2.71	5.6	57	16	24,510	6.79	7	51	8	22,750	6.02	7.13
LION FEMALE	32	3	n=17			35	2	n=19			22	3	n=13		
% REPORTED		**17.9%**					**19.6%**					**15.1%**			
LEOPARD MALE	120	29	61,450	1.78	3.9	130	37	99,023	3.93	6	134	33	105,606	5.94	4.02
LEOPARD FEMALE	0	6	n=46			0	20	n=67			8	7	n=45		
% REPORTED		**29.2%**					**43.8%**					**28.2%**			

Data Sources: a = Taylor and Mackie (1997); b = Mackie (1997); c = Price Waterhouse (1996); d = DNPWLM (1996a); DNPWLM (1996b).

District Codes: BB = Beit Bridge; BM = Bulilima-Mangwe; BN = Binga; CP = Chipinge; CR = Chiredzi; GN = Gokwe North; GV = Guruve; HU = Hurungwe; HW = Hwange; MB = Muzarabani; MD = Mudzi; NM = Nyaminyami; TS = Tsholotsho.

Ø = data not available; † = data re-calculated to US $ from WWF HUNT database which appeared to indicate Z$.

NB: when 1994 population estimates were unavailable, 1993 values were used and noted. Estimates for CR include Gonarezhou aerial survey results; GV include data from Dande aerial surveys; HW includes estimates for Hwange NP and Matetsi SA.

APPENDIX N

POLICY DOCUMENTS RELATED TO CAMPFIRE

1. Policy Logs from WWF Policy Monitoring (Bond 1998)
2. Appropriate Authority - Parks and Wild Life Act
3. Parks and Wild Life Act SI 26-2/1998
4. Excerpts from Natural Resources Act, Communal Land Act, Forest Act, RDC Act
5. Example of RDC Natural Resources By-Laws

Appendix [redacted] Policy Logs

Wildlife Policy Log

Policy / Legislation	Date	Sponsor	Description and Potential Impact	Positive or Negative	Source
Parks and Wildlife Act	1975 (amended 1982, 1990)	Government	LSCF become the appropriate authority for wildlife on their land.	Positive	The Act
Amendment to Parks and Wildlife Act which allows district councils to be designated the appropriate authority for wildlife in the communal lands	1982	Government	Enabled district councils to be designated the appropriate authority for wildlife in the communal areas.	Positive	Amendment to the Act
General Notice 369 of 1988	1988	Muzarabani District Council	Mavuradonha Wilderness Area proclaimed. First protected area to be created in the communal lands without central government internvention.	Positive	General Notice 369 of 1988 in Cunliffe (1992)
Gu uve and Nyaminyami District Councils receive letters of Appropriate Authority from Minister of Environment and Tourism.	1989	Minister of Environment and Tourism	Nyaminyami and Guruve become the first districts to control wildlife resources. Start of the CAMPFIRE Programme.	Positive	Petersen 1992
Protection of Wild life (Indemnity) Act	1989	Government	This protects persons against criminal liability in respect of acts done in good faith to suppress unlawful hunting of wildlife.	Positive	The Act
DNPWLM issues CAMPFIRE Guidelines for the use and allocation of wildlife revenue by district councils	1991	DNPWLM	Guidelines recommended that at least 50% of gross wildlife income be devolved to producer communities, up to 35% be used for wildlife management and up to 15% for programme administration.	Positive	Petersen

DNPWLM indicates to Chipinge and Guruve RDCs that they will be required to lease Malipati and Dande SA at commercial rates	October 1996	DNPWLM	Malapati and Dande Safari Areas were created out of communal land for benefit of communal land residents. Policy decision indicative of a recentralisation of control by DNPWLM.	Negative	Pers. comm. Guruve RDC.
MET and MLGRUD issue joint statement indicating that RDC's should be considered the primary beneficiaries of the CAMPFIRE Programme.	November 1996	MET and MLGRUD	Further rejection of the producer community principle and the efforts of the CAMPFIRE Collaborative Group to decentralise appropriate authority to ward level.	Negative	IUCN (1997)
MET and MLGRUD issue joint statement that RDCs "will not be forced into any one model of benefit distribution"	November 1996	MET and MLGRUD	Further rejection of the producer community principle and the efforts of the CAMPFIRE Collaborative Group to decentralise appropriate authority to ward level. Potentially allows RDCs to retain significant proportion of wildlife revenue.	Negative	IUCN (1997)
DNPWLM becomes a Statutory Fund	February 1997	DNPWLM	Potentially reduces DNPWLM involvement in wildlife management activities outside the protected areas.	Negative	DNP&WLM
DNP&WLM requires RDCs to report all problem animals to provincial wardens first before dealing with them	1997	DNPWLM	Effective re-centralisation of problem animal control, weakens the enabling conditions created by the decentralisation of appropriate authority.	Negative	CAMPFIRE Association
DNP&WLM Public Notice requiring LSCF to submit intended offtake quotas for private land.	October 1997	DNPWLM	This notice weakens the enabling conditions created by the decentralisation of appropriate authority.	Negative	Sunday Mail 27 October 1997
MET indicates that other resources like forests and minerals will be included in the CAMPFIRE programme	1997	Ministry of Environment and Tourism	Indication that there is to be decentralisation of management of resources other than wildlife.	Positive	MET
CAMPFIRE Association press statement indicates that the Association will not dictate to communities on the use of wildlife revenue.	October 1997	CAMPFIRE Association.	Indicative of the autonomy that the CAMPFIRE Association feels should be given to local communities.	Positive	Herald 30 October 1997

Forest Policy Log

Policy / Legislation	Date	Sponsor	Description and Potential Impact	Positive or Negative	Source
Native Reserves Forest Produce Act	1928	Government	The Act sought to regulate the use of forest products in the communal areas rather than commercial areas, and was applied on the basis of land tenure.	Negative	
Natural Resources Act (Chapter 20:13)	1941	Government	The Act gives the Natural resources Board powers to enforce measures on land users or occupiers, most of which are technical recommendation based on shaky empirical foundations.	Negative	Bradley and McNamara, 1993
Forest Act (Chapter 19:05)	1949	Government	For the establishment of a commission for administration, control and management of State forests.	Positive	The Act
Forestry Commission established	1954	Government	The Commission was established for the management of demarcated forests.		
Communal Land Forest Produce Act:	1988	Government	The act regulates exploitation of and protects forest produce within communal land This was as well enacted on the basis of land tenure, thus having the same effect as the Native Reserves Forest Produce Act (1928). It also makes much current forest product management in communal areas illegal.	Negative	Bradley and McNamara, 1993
Memorandum by Minister of Environment and Tourism	1990	Minister of Environment and Tourism	The memorandum sought Cabinet endorsement of Zimbabwe's National Forest Policy	Positive	
Forest Act (Chapter 19:05) amended	1996	Government	The Act allows for more innovative resource sharing opportunities to be developed on forest land.	Positive	Bradley and McNamara

Land Acquisition Act	1985	Government	The Act gave government the first right to purchase large scale farms for resettlement	Positive	Land Tenure Commission Report
Rural District Councils Act	1988	Government	Authorized the formation of a unified system of local government	Positive	The Act
Government announces land reform policy (after the expiry of the Lancaster House Constitution)	1990	Government	The reform had the following key policy issues: *land designation for resettlement *land price *land taxation and farm size control *monitoring of land use productivity *land ownership control *state sector development	Positive	
Land Acquisition Act	1992	Government	the Act empowers the president and other authorities to acquire land and other immovable property compulsorily	Negative	The Act
The President appoints Land Tenure Commission	1993	President Mugabe	The Commission was appointed to inquire the appropriate land tenure systems	Positive	Land tenure commission Report
Land Tenure Commission Report	1994	Land Tenure Commission	Commission recommends proposed legislative and administrative reforms on land tenure, with focus towards encouraging local level autonomy and security in the communal areas.	Positive	Land tenure commission Report
Policy / Legislation	**Date**	**Sponsor**	**Description and Potential Impact**	**Positive or Negative**	**Source**

less in either case the amount of any compensation which may have been paid to the owner by or on behalf of the person convicted.

(3) Sections 348 and 349 of the Criminal Procedure and Evidence Act [*Chapter 9:07*] shall apply, *mutatis mutandis*, in relation to the amount specified in an order made in terms of subsection (1) as if such amount were a fine referred to in those sections and any amount so recovered shall be paid to the owner of the animal concerned:

Provided that the owner shall give security *de restituendo* in case the judgment of the court which made the order is reversed on appeal or review

(4) Where an order is made in terms of subsection (1) upon two or more persons, the liability therefor shall be joint and several unless the court, in its order, apportions the amount which each such person shall be required to pay.

106 Forfeiture and cancellation of authority in terms of this Act

(1) Where any person is convicted of—

(*a*) a contravention of paragraph (*b*) of subsection (1) of section *fifteen*, paragraph (*a*) of subsection (1) of section *twenty-four* or subsection (1) of section *thirty-six*; or

(*b*) an offence in terms of this Act involving hunting or fishing and such hunting or fishing took place at night;

the court—

(i) shall, unless good cause to the contrary is shown, order that any weapon, explosive, fishing net or dazzling light; and

(ii) may order that any tent, vehicle, aircraft or boat; used for the purpose of or in connection with the commission of the offence shall be forfeited to the State.

(2) Where any person is convicted of an offence in terms of this Act involving hunting or fishing and the offence is not an offence mentioned in paragraph (*a*) or (*b*) of subsection (1), the court may order that any weapon, explosive, fishing net, tent, vehicle, aircraft or boat used for the purpose of or in connection with the commission of the offence shall be forfeited to the State.

(3) Where any person is convicted of an offence in terms of this Act, the court may order that any animal, other than a specially protected animal, or the meat or trophy of any such animal or any fish in respect of which the offence was committed shall be forfeited to the appropriate authority for the land on which or the appropriate authority for the waters in which, as the case may be, the offence was committed;

(4) Anything ordered to be forfeited to the State in terms of subsection (1), (2) or (3) shall be deemed to be a State trophy.

(5) The conviction of a person who has any authority in terms of this Act of an offence in terms of this Act shall, if he is sentenced therefor to pay a fine of two hundred dollars or more or to imprisonment for a period of three months or more and whether or not such imprisonment is suspended or is an alternative to a fine, have the effect of cancelling any such authority with effect from the date of such conviction unless in a particular case the Minister otherwise directs.

PART XVI

INSPECTORS, OFFICERS, EMPLOYEES AND ADVISORY COMMITTEES

107 Director of National Parks and Wild Life Management

(1) There shall be a Director of National Parks and Wild Life Management whose office shall be a public office and form part of the Public Service and who shall have the powers and perform the duties conferred upon him by this Act.

(2) The Minister may delegate to the Director such of the powers conferred upon him in terms of this Act as he thinks fit

(3) All powers conferred upon the Director in terms of this Act or delegated to him by the Minister shall be exercised subject to the directions of the Minister.

(4) The Director may, with the consent of the Minister, delegate to officers, inspectors and employees such of the powers and duties conferred upon or delegated to him in terms of this Act as he thinks fit.

(5) All powers and duties delegated to an officer, inspector or employee by the Director shall be exercised subject to the directions of the Director.

108 Appointment of appropriate authority

(1) The Minister may, by notice in a statutory instrument, appoint a rural district council to be the appropriate authority for such area of Communal Land as may be specified in such notice and may in like manner amend or revoke such notice.

(2) Where, by virtue of a notice made in terms of subsection (1), the appropriate authority for any area of Communal Land is changed, any permit issued by the previous appropriate authority which was of force and effect immediately before the date of commencement of the notice shall remain in force and effect and be subject to amendment or cancellation as if it had been issued by the new appropriate authority.

109 Officers, inspectors and employees

(1) The Minister may designate the persons or classes of persons employed in the Public Service who shall be officers, inspectors or employees for the purpose of exercising the powers and performing the duties conferred and imposed upon officers, inspectors and employees in terms of this Act:

Provided that the Minister shall not designate persons employed in any Ministry the administration of which has not been assigned to him without the consent of the Minister to whom the administration of that Ministry has been assigned.

(2) An officer, inspector or employee shall be furnished with a certificate signed by or on behalf of the Minister which shall state that the holder has been designated as an officer, inspector or employee for the purposes of this Act.

(3) An officer, inspector or employee exercising any power or performing any duty conferred or imposed upon him in terms of this Act or about to do so shall, on demand by any person concerned, produce the certificate issued to him in terms of subsection (2).

(4) The Minister may delegate to officers, inspectors and employees such of the powers conferred upon him in terms of this Act as he thinks fit.

(5) All powers and duties conferred upon officers, inspectors and employees in terms of this Act or delegated to

(c) the number of persons to be taken on the safari; and

(d) the park in which the safari is to be conducted; and

(e) the type of vessel or vehicle to be used on the safari; and

(f) the currency in which any amount payable is to be paid.

(2) On receipt of a notice sent to him in terms of subsection (1) and the appropriate fee, the Director shall in writing authorize the photographic or viewing safari concerned unless he is satisfied on reasonable grounds that—

(a) any information contained in the notice is untrue; or

(b) a contravention of any law is likely to take place if the safari takes place; or

(c) the area in the Parks and Wild Life Estate in respect of which the application is made, is unsuitable for the conduct of the safari.

(3) The Director may attach such reasonable conditions as he thinks fit to any authority given by him in terms of subsection (2), and any such conditions shall be endorsed in writing on the authority concerned.

(4) No person shall, for reward or otherwise, conduct any other person who is not ordinarily resident in Zimbabwe on a photographic or viewing safari in a Parks and Wild Life Estate unless—

(a) at the commencement of the safari he is in possession of the written authority given by the Director in terms of subsection (2) in respect of the safari concerned; and

(b) he complies with any conditions which the Director may have attached to the written authority; and

(c) holds in addition to holding a professional hunter's licence, a learner professional hunter's licence or a professional guide's licence, a tour operator's licence or is a director, employee or agent of a holder of a tour operator's licence issued in terms of the Tourism Act [*Chapter 14:20*]; and

(d) in the case where an open vehicle is used, it is solidly constructed up to the shoulder level of seated passengers and is fitted with protective bars; and

(e) the vehicle to be used on the safari is the subject of an operator's licence issued in terms of the Road Motor Transportation Act [*Chapter 13:10*];

(5) Subsection 4 shall not apply in relation to an officer, honorary officer or employee while he is carrying out his duties as such.

(6) Subsection 4 shall come into operation two months after the date of commencement of the Parks and Wild Life (General) (Amendment) Regulations, 1998 (No. 2):

Provided that, if during that two-month period any person referred to in subsection (1) applies for a tour operator's licence under the Tourism Act [*Chapter 14:20*], he shall be deemed for the purpose of this section to be the holder of such a licence until his application is granted or refused.".

4. Section 59 of the principal regulations is amended—

(a) in subsection (1) by the insertion after paragraph (f) of the following paragraphs—

"(g) the full names and address of the hunter who is to conduct the safari and his licence number; and

(h) the duration of the hunt and the types of animals to be hunted.";

(b) by the insertion of the following subsection—

"(4b) No person shall permit any person who is not ordinarily resident in Zimbabwe to hunt on any land for which he is the appropriate authority any animals other than those entered on the authority to hunt set out in the Fourteenth Schedule.".

5. Section 60 of the principal regulations is amended—

(a) in subsection (1), in paragraph (b) by the insertion after "form" of "and a copy of the authority to hunt";

(b) by the insertion after subsection (3) of the following subsection—

circulating in its area and shall give verbal or written notice of the time and place of such meeting to every such holder of land whose address is known to such committee.

(5) The notice referred to in subsection (4) shall set out the proposed amount of the unit of the tax to be imposed.

(6) At any meeting convened in terms of subsection (4), those members of the conservation committee who are holders of land referred to in that subsection shall be entitled to vote on any resolution at such meeting.

(7) Every such tax shall be imposed, assessed and graduated in accordance with the Schedule, and shall become due and payable upon a date fixed by the conservation committee.

(8) If any tax imposed under this section remains unpaid after three months from the date fixed by the conservation committee for the payment thereof, interest upon such tax may, in the discretion of the conservation committee, be charged and recovered by such committee at the rate fixed in terms of section *forty-one*, reckoned from the date upon which such period of three months expires, with a minimum charge of one month's interest.

44 Position upon division of intensive conservation area

(1) Whenever an intensive conservation area is divided into two or more intensive conservation areas in consequence of the exercise by the Minister of the powers conferred upon him by paragraph (*f*) of subsection (2) of section *thirty-five* or whenever any portion of an intensive conservation area is severed and declared to be a separate intensive conservation area or is joined to another intensive conservation area in consequence of the exercise by the Minister of the powers conferred upon him by paragraph (*e*) of subsection (2), the assets and liabilities of the conservation committee appointed for the intensive conservation area which is divided or from which the portion is severed, as the case may be, shall be apportioned among the conservation committees concerned in such manner and in such proportions as may be mutually agreed upon by such committees or, failing such agreement, as may be determined by the Board.

(2) Whenever two or more intensive conservation areas are joined in consequence of the exercise by the Minister of the powers conferred upon him by paragraph (*d*) of subsection (2) of section *thirty-five*, the conservation committees appointed for such areas shall be deemed to be dissolved and all the assets and liabilities of such committees shall be transferred to and vest in the committee appointed in their place.

(3) Whenever the declaration of an area as an intensive conservation area is cancelled in consequence of the exercise by the Minister of the powers conferred upon him by paragraph (*g*) of subsection (2) of section *thirty-five*, the conservation committee appointed for such area shall be dissolved and all moneys or other assets or property or things whatsoever, and all books, accounts or other documents belonging to such committee shall be vested in such person as may be appointed for that purpose by the Minister (hereinafter called the liquidator), and the liquidator shall liquidate all valid claims against the committee out of the moneys or other assets of the committee.

(4) If the moneys or other assets referred to in subsection (3) prove to be—

(*a*) less than the amount required to liquidate all valid claims which may be brought against the committee, the liquidator may, in order to make good the deficiency, levy a rate assessed in such manner as may be approved by the Board upon all holders of land within the committee's area, and such rate shall become due on such date as may be determined by the liquidator and may be recovered by him by proceedings in any court of competent jurisdiction;

(*b*) in excess of the amount required to liquidate all valid claims which may be brought against the committee, the liquidator shall dispose of such surplus in such manner as the Board may direct.

PART VI

CONSERVATION AND IMPROVEMENT OF NATURAL RESOURCES IN COMMUNAL LAND

45 Provisions for Communal Land

The provisions of this Part shall apply to Communal Land.

46 Protection of despoiled or deteriorated areas

(1) Where in any Communal Land any land has become despoiled or is deteriorating through over-grazing or other misuse, the Board may, with the approval of the Minister responsible for the administration of the Communal Land Act [*Chapter 20:04*] direct that the whole or part of such land be reserved against human occupation or cultivation, the depasturing of stock or the cutting down or destruction of trees and other vegetation.

(2) No reservation shall take place in terms of subsection (1) unless and until the Minister responsible for the administration of the Communal Land Act [*Chapter 20:04*] is satisfied that suitable provision has been made elsewhere for the inhabitants who would be affected by the reservation and such reservation shall be withdrawn when, in the opinion of the Board, its objects have been sufficiently accomplished.

(3) Land reserved in terms of this section shall be clearly demarcated and may, with a view to more effective regeneration, be fenced on the recommendation of the Board and the cost of such fencing shall be paid from moneys appropriated for the purpose by Act of Parliament.

(4) Any person committing an act in conflict with a reservation made in terms of subsection (1) or interfering with any demarcation or fencing carried out in terms of subsection (3) shall be guilty of an offence.

47 Destocking and limitation of stock

(1) Whenever the President is satisfied, on the report of the Board or of the Minister responsible for local government, that the natural resources in any Communal Land are being injured or are deteriorating through over-stocking by domestic animals, he may authorize the reduction of the number of such animals and prescribe the maximum number and class of such animals as may be depastured on a fixed unit of land.

(2) The Minister responsible for local government, before submitting any report to the President in terms of subsection (1), shall first submit such report to the Board for its report thereon.

(3) Destocking and limitation of stock in terms of this section shall be carried out in accordance with regulations.

48 Setting aside areas for protection of natural resources

(1) The President may, on the recommendation of the Board and with the approval of the Minister responsible for the administration of the Communal Land Act [*Chapter 20:04*] set aside areas in any Communal Land for the

COMMUNAL LAND ACT

Acts 20/1982, 8/1985, 21/1985, 5/1988, 15/1989 (s. 32), 3/1992

ARRANGEMENT OF SECTIONS

PART I

PRELIMINARY

Section

1 Short title
2 Interpretation

PART II

COMMUNAL LAND

3 Extent of Communal Land
4 Vesting of Communal Land
5 Description of Communal Land
6 Additions to and subtractions from Communal Land

PART III

OCCUPATION AND USE OF COMMUNAL LAND

7 Restriction on right to occupy or use Communal Land
8 Occupation and use of Communal Land for agricultural or residential purposes
9 Permits to occupy and use Communal Land
10 Setting aside of Communal Land for certain purposes
11 Servitudes relating to water rights over Communal Land

PART IV

GENERAL

12 Compensation
13 By-laws of rural district councils
14 Model by-laws
15 Regulations
16 Penalties and orders of ejectment
17 Savings

AN ACT to provide for the classification of land in Zimbabwe as Communal Land and for the alteration of such classification; to alter and regulate the occupation and use of Communal Land; and to provide for matters incidental to or connected with the foregoing.

[Date of commencement: 1st February, 1983]

PART I

PRELIMINARY

1 Short title

This Act may be cited as the Communal Land Act [*Chapter 20:04*]

2 Interpretation

In this Act—

"Communal Land" means land referred to as Communal Land in section *three*;

"inhabitant", in relation to any Communal Land or part thereof, means a person who is entitled, in terms of this Act, to reside in that Communal Land or part thereof;

"Minister" means the Minister of Local Government, Rural and Urban Development or any other Minister to whom the President may, from time to time, assign the administration of this Act;

"use", in relation to Communal Land, includes the erection of any building or enclosure, ploughing, hoeing, the cutting of vegetation, the depasturing of animals or the taking of sand, stone or other materials therefrom

PART II

COMMUNAL LAND

3 Extent of Communal Land

Communal Land shall consist of land which, immediately before the 1st February, 1983, was Tribal Trust Land in terms of the Tribal Trust Land Act, 1979 (No. 6 of 1979), subject to any additions thereto or subtractions therefrom made in terms of section six

4 Vesting of Communal Land

Communal Land shall be vested in the President, who shall permit it to be occupied and used in accordance with this Act

5 Description of Communal Land

(1) The Minister shall, by statutory instrument, publish a description of the area of Communal Land.

(2) The Minister may from time to time, by statutory instrument, amend any instrument published in terms of subsection (1), or any replacement of such instrument, in order—

(*a*) more clearly to describe the area of Communal Land; or

(a) a refusal by a rural district council to issue a permit in terms of subsection (1) or to vary any permit or any condition thereof in terms of subsection (2), or

(b) the cancellation or variation of a permit or any condition thereof in terms of subsection (2),

may appeal to the Minister within such time and in such manner as may be prescribed by regulation.

(4) In any appeal in terms of subsection (3) the Minister may confirm, vary, set aside or reverse the refusal, cancellation or variation appealed against or make such other order in the matter as he thinks just.

10 Setting aside of Communal Land for certain purposes

(1) Subject to this section, the Minister shall set aside land contained within Communal Land for the establishment of—

(a) a township, village, business centre or industrial area, where such land is—

(i) designated for any such purpose in terms of a rural development plan approved by him and the Minister responsible for lands after consultation with the Director of Physical Planning and any rural district council established for the area concerned, or

(ii) the subject of a layout approved in terms of section 43 of the Regional, Town and Country Planning Act [*Chapter 29:12*],

or

(b) an irrigation scheme, where such land is designated for such purpose in terms of a rural development plan approved by him and the Minister responsible for lands after consultation with the Natural Resources Board established in terms of the Natural Resources Act [*Chapter 20:13*] and any rural district council established for the area concerned.

(2) Subject to this section, after consultation with any rural district council established for the area concerned, the Minister may set aside any land contained within Communal Land, other than land referred to in subsection (1), for any purpose whatsoever, including a purpose referred to in subsection (1), which he considers is in the interests of inhabitants of the area concerned or in the public interest or which he considers will promote the development of Communal Land generally or of the area concerned.

(3) Before any land is set aside in terms of subsection (1) or (2) the Minister shall publish a statutory instrument—

(a) describing the land concerned, and

(b) specifying the purpose for which the land concerned is to be set aside, and

(c) specifying the date with effect from which the land concerned will be set aside, and

(d) ordering all persons, or such class of persons as the Minister may specify in the notice, who are occupying or using the land concerned, otherwise than by virtue of a right held in terms of the Mines and Minerals Act [*Chapter 21:05*], to depart permanently with all their property from the land concerned within such reasonable period as the Minister shall specify in the notice,

and the Minister shall ensure that such steps are taken as appear to him sufficient to disseminate the terms of the notice within the area of the land concerned.

(4) Where any land is set aside in terms of subsection (1) or (2), the Minister may in regulations made in terms of section *fifteen*, provide for—

(a) charges and deposits to be made for any services, amenities or facilities provided by the State within or for any such land, whether or not any such service is used or not;

(b) supplementary charges in respect of immovable property within any such land, to cover the expenses incurred by the State in the maintenance and administration of such land;

(c) delegating to any rural district council within whose area the land is situated responsibility for collecting any rents, charges, deposits or supplementary charges on behalf of the State;

(d) generally, the terms and conditions subject to which any person may lease, occupy or use any such land.

(5) Regulations providing for charges, deposits or supplementary charges in terms of subsection (4)—

(a) may provide that the charges and supplementary charges shall be included in rents or charged separately, and

(b) may divide the persons who are liable to pay the charges, deposits or supplementary charges into classes and fix different amounts for different classes, and

(c) may vary any charges and deposits according to the use to which the premises concerned are put, and

(d) shall base every such supplementary charge upon a unit of land and additionally, or alternatively, a unit of residential or business accommodation, as the case may be, determined by the Minister and may vary such supplementary charge according to any or all of the following—

(i) the type of tenure under which the property is held;

(ii) the value of the property, whether based upon the value of the land or the improvements, or both;

(iii) the area of the property, being either that of the land or of the improvements;

(iv) the use to which the property is put.

(6) Any land set aside in terms of subsection (1) or (2) shall remain part of Communal Land unless the President, in terms of subsection (1) of section *six*, declares that it shall cease to form part of Communal Land.

11 Servitudes relating to water rights over Communal Land

Where any person has applied to the Administrative Court in terms of the Water Act [*Chapter 20:22*], for—

(a) a servitude of storage as defined in section 87 of that Act, and the exercise of such servitude would cause the inundation of any area of Communal Land, the Administrative Court may grant such servitude and, if necessary, any servitude of aboutment, purification or passage as defined in section 78 of that Act; or

(b) a servitude of passage as defined in section 78 of that Act for the passage of water over any area of Communal Land, the Administrative Court may grant such servitude;

if the Minister, after consultation with any rural district council established for the area concerned, has consented to the grant of such servitude or servitudes, as the case may be, and any conditions fixed by him in giving his consent are made binding on the person to whom the servitude has been or the servitudes have been, as the case may be, granted.

(7) Notwithstanding anything to the contrary contained in the law relating to the Public Service, no officer in the Public Service shall be seconded to the Commission except for an indefinite period.

(8) The First Schedule shall apply to any employee of the Commission who is not on secondment from the Public Service.

28 Pension contributions to be deducted

Any contributions for pension purposes which are payable to the Consolidated Revenue Fund in terms of this Act by an employee of the Commission, whether on secondment from the Public Service or otherwise, shall be deducted from the emoluments of the employee concerned and forwarded by the Commission to the State.

29 Commission to contribute to Consolidated Revenue Fund

There shall be paid monthly out of the funds of the Commission to the Consolidated Revenue Fund such amount as may be determined by the Minister responsible for finance, after consultation with the Commission, in respect of the contributions for pension purposes paid to the Consolidated Revenue Fund by employees of the Commission.

30 Disability benefits

(1) Any enactment providing for the payment of compensation in respect of the injury or death of officers or employees of the Public Service shall apply, *mutatis mutandis*, in relation to contributors as though they were officers or employees of the Public Service.

(2) The Minister responsible for finance may recover from the Commission any compensation paid to a contributor or his dependants in terms of subsection (1).

(3) A contributor shall not be regarded as a workman for the purposes of the National Social Security Authority Act [*Chapter 17:04*].

(4) In this section—

"contributor" means an employee of the Commission who is paying contributions to the Consolidated Revenue Fund in terms of this Act, whether he is on secondment from the Public Service or otherwise.

31 Suspension, reduction or forfeiture of pension or gratuity

If any employee or former employee of the Commission who becomes entitled to a pension or gratuity or is in receipt of a pension under this Act—

(*a*) is found by a board appointed by the President for the purpose to have made improper use of or to have disclosed in an improper manner any information which he may have obtained in the course of his employment; or

(*b*) is found by a competent court to have been guilty of misappropriation of property of the Commission which would, if it had been discovered before he became entitled to a pension or gratuity, have rendered him liable to discharge or dismissal; or

(*c*) is found to have made a false statement for the purpose of obtaining a pension or gratuity or commutation of pension, knowing the statement to be false or not believing it to be true; or

(*d*) refuses to comply with a reasonable request made by the Commission to afford all assistance and information in his power relating to any appointment formerly held or class of duty formerly carried out by him; or

(*e*) solicits or, without the consent of the Commission, accepts, directly or indirectly, any gift of a pecuniary value after retirement in connection with his service;

the President may order that any right to any pension or gratuity to which that person has become entitled or the pension of which he is in receipt shall be suspended, reduced or forfeited.

32 Deduction from pension, gratuity, refund of contributions or other benefit

(1) The Minister responsible for finance may authorize the deduction from any pension, gratuity, refund of contributions, commutation of pension or other benefit payable under this Act to an employee of the Commission who has been discharged or dismissed for misconduct of an amount equal to any direct loss which the Commission has sustained by reason of the conduct of the employee on account of which the employee was discharged or dismissed from the service of the Commission.

(2) The Minister may authorize the deduction from any pension, gratuity, refund of contributions or other benefit to which a person or his estate is entitled under this Act of a liquidated amount which that person is liable to pay to the Commission.

(3) To facilitate the recovery of an amount due under this section, the Minister may order the commutation, in accordance with any enactment relating to the commutation of pensions payable to members of the Public Service, of all or part of the pensions payable to the member notwithstanding anything to the contrary contained in this Act.

PART III

FOREST ESTATE AND FOREST LAND

33 Forest Estate

(1) The Forest Estate shall consist of—

(*a*) forest land;

(*b*) demarcated forest on Rhodes Estates;

(*c*) land owned by the Commission specified in Part III of the Third Schedule.

(2) The Forest Estate shall be used for the purposes specified in this Act.

34 Forest land

(1) Forest land shall consist of State land which is declared to be a demarcated forest.

(2) The total extent of forest land shall not be reduced by more than one *per centum* of the total extent of forest land on the appointed day.

PART IV

DEMARCATED FORESTS, NATURE RESERVES, PRIVATE PROTECTED FORESTS, RESERVED AND PROTECTED TREES

35 Demarcated forest

(1) Each of the areas described in Parts I and II of the Third Schedule is hereby declared to be a demarcated forest which shall be known by the name specified in the Third Schedule.

(2) Subject to this Act, the President may, on the recommendation of the Commission, by notice in a statutory instrument, amend the Third Schedule for the purpose of—

(*a*) declaring a new demarcated forest and specifying the name thereof;

(*b*) changing the name of any demarcated forest;

(*c*) adding any area to a demarcated forest;

(*d*) subtracting any area from a demarcated forest;

administration of the Natural Resources Act [*Chapter 20:13*].

(5) Within a year after a declaration in terms of subsection (1) or within such longer period as the Minister may permit, the council shall ensure that the boundaries of the area for which a natural resources conservation subcommittee is deemed to have been appointed in terms of paragraph (*b*) of subsection (2) are altered so that they coincide with the boundaries of one or more wards of the council area.

(6) The assets and liabilities of the conservation committee for any intensive conservation area of which a portion is included within the intensive conservation area of a council shall be apportioned between the committee and the council in such manner and in such proportion as may be mutually agreed upon by the committee and the council or, failing such agreement, as may be determined by the Natural Resources Board established in terms of the Natural Resources Act [*Chapter 20:13*].

(7) The assets and the proceeds from the sale, realization or other disposal of the assets which a council has acquired in terms of subsection (6) shall be applied only to the purposes in respect of which powers have been conferred upon a conservation committee in terms of the Natural Resources Act [*Chapter 20:13*] or to such purposes as may be prescribed.

(8) The Minister may, by a statutory instrument—

(*a*) upon the recommendation of the Minister responsible for the administration of the Natural Resources Act [*Chapter 20:13*], declare that, with effect from a specified date, any part of a council area which is an intensive conservation area shall cease to be part of the intensive conservation area; and

(*b*) make any consequential amendments he considers necessary to any notice previously made in a statutory instrument in terms of subsection (1) in respect of the intensive conservation area concerned.

(9) Where the Minister has made a declaration in terms of subsection (8), he may, after consultation with the Minister responsible for the administration of the Natural Resources Act [*Chapter 20:13*] and the council concerned, give directions as to any matter or thing arising from such declaration, including the apportionment of assets liabilities between the council and any conservation committee formed or to be formed in terms of the Natural Resources Act [*Chapter 20:13*] for the whole or part of the area which is excluded from the intensive conservation area in terms of that declaration.

(10) Whenever a council meets as a natural resources conservation committee, such meeting may be attended by a member of the Natural Resources Board established in terms of the Natural Resources Act [*Chapter 20:13*] or by any person authorized by the Natural Resources Board for that purpose.

62 Other committees of council

(1) Subject to this Act, a council may appoint such committees, whether of a general, special or local nature, as it may think fit, and may delegate to any such committee, subject to such terms and conditions as the council may think fit, any power that may be exercised by the council:

Provided that—

(i) the council shall appoint a committee whenever directed to do so by the Minister and shall delegate to the committee such functions as the Minister may direct;

(ii) the council shall not delegate to any committee—

(*a*) power to impose levies, rates, special rates, rents or charges, to borrow money, to expropriate property or to make by-laws; or

(*b*) unless the Minister has authorized such delegation, any power specified in paragraph 1 of the First Schedule.

(2) Subject to this Part, a council may continue, alter or discontinue a committee appointed in terms of subsection (1):

Provided that a council shall not alter or discontinue a committee referred to in proviso (i) to subsection (1) without the consent of the Minister.

(3) Every committee referred to in subsection (1) shall consist of—

(*a*) two or more councillors appointed to the committee by the council;

(*b*) such persons, other than councillors, who are enrolled on any voters' roll for a ward of the council area as the council may, in consultation with the committee, co-opt to be members of the committee:

Provided that the number of co-opted members shall not exceed the number of councillors.

(4) A person co-opted to be a member of a committee in terms of paragraph (*b*) of subsection (3)—

(*a*) shall hold office for such period and subject to such conditions as the council may fix; and

(*b*) shall not be eligible for appointment as the chairman of the committee; and

(*c*) shall be subject to section *forty-eight*, which shall apply, *mutatis mutandis*, to such member.

63 General provisions applicable to all committees

(1) In this section—

"committee" includes a natural resources conservation sub-committee.

(2) The chairman of the council shall be an *ex officio* member of every committee appointed or established by a council under this Act, but unless he has been specifically appointed or elected to a committee he shall not be entitled to vote or be elected as chairman of the committee.

(3) All powers vested in a committee in terms of this Act may be exercised at any duly convened meeting thereof at which no fewer than one-half of the whole number of members and, in any case, no fewer than two members, are present:

Provided that the presence of the chairman of the council solely in his capacity as an *ex officio* member of the committee shall be disregarded for the purposes of this subsection.

(4) Subject to sections *fifty-nine*, *sixty* and *sixty-one*, every committee—

(*a*) shall elect a chairman; and

(*b*) may elect a vice-chairman;

from among its members who are councillors.

(5) If, at any meeting of a committee—

(*a*) the chairman of the committee is absent, the vice-chairman shall act as chairman;

(*b*) both the chairman and vice-chairman of the committee are absent or the chairman is absent and no vice-chairman has been elected, the committee shall elect one of its members who is a councillor or, if there is no such councillor present, one of its other members, to act as chairman at that meeting.

(6) Any question before a meeting of a committee shall be determined by resolution passed by a majority of the

Example of RDC NRM By-Laws

Statutory Instrument 67 of 1996.

[ACT 8/88

Bulilimamangwe Rural District Council (Communal and Resettlement Land) (Land Use and Conservation) By-laws, 1996

ARRANGEMENT OF SECTIONS

Section

1. Title.
2. Application.
3. Interpretation.
4. Preparation and adoption of a plan.
5. Amendment of a plan.
6. Contents of a plan.
7. Sleighs.
8. Protection of natural resources.
9. Fencing and conservation works.
10. Evidence.
11. Offences and penalties.

IT is hereby notified that the Minister of Local Government, Rural and Urban Development has, in terms of subsection (4) of section 90 of the Rural District Councils Act, 1988, approved the following by-laws made by the Bulilimamangwe Rural District Council:—

Title

1. These by-laws may be cited as the Bulilimamangwe Rural District Council (Communal and Resettlement Land) (Land Use and Conservation) By-laws, 1996.

Application

2. These by-laws shall apply to communal and resettlement land within the Bulilimamangwe Rural District Council area.

Interpretation

3. In these by-laws—

"conservation works" means works undertaken by a conservation committee in terms of section 152 of the Natural Resources Act [*Chapter 150*];

"regional officer" means the regional officer in the Ministry of Environment and Tourism responsible for the region in which the communal or resettlement land falls, or any person in his office designated by him in writing to to perform his functions.

Preparation and adoption of a plan

4. (1) The council may prepare a plan for—

(a) all communal or resettlement land within the council area; or

(b) any ward or combination of wards in communal or resettlement land within the council area; or

(c) any part of a ward or wards in communal and resettlement land within the council area.

(2) If requested to do so by the village development committee or a headman, the council shall prepare a plan for the area for which the village development committee or headman concerned is responsible.

(3) Where a council intends to prepare a plan in terms of subsection (1), it shall cause the inhabitants of the area for which the plan is intended to be notified, in such manner as it considers appropriate, of its intention to prepare a plan and shall—

(a) make available for inspection by any of the inhabitants a draft proposal of the area plan; and

(b) call upon any inhabitant who has any objection to the proposed plan, to lodge his objection with the council within thirty days of the date of notification of the proposal.

(4) In preparing any plan, the council shall—

(a) seek the advice of—

(i) the provincial planning officer; and

(ii) the provincial agritex officer; and

(iii) the regional officer; and

(iv) the provincial warden;

and

(10) A copy of an adopted and approved plan shall be available for inspection, free of charge, during normal working hours at the council offices and such other places as the council considers to be convenient and one copy shall be sent to each village development committee affected by the plan.

Amendment of plan

5. The provisions of subsections (3) to (8) of section 4 shall apply, *mutatis mutandis*, to any proposals to amend a plan.

Contents of a plan

6. (1) In respect of any area set aside in the plan for grazing, the council may, in the plan, specify—

(a) the maximum number of livestock which may be grazed in any grazing area;

(b) which owner or owners may graze livestock in a grazing area;

(c) the maximum number of livestock or the maximum number of different types of livestock which each owner may graze in a grazing area;

(d) the grazing within which inhabitants are to cease other activities within a grazing area;

(e) the period within which any inhabitant is to reduce the number of livestock to the level he is permitted to graze in any grazing area in terms of paragraph (c);

(f) the period within which any inhabitant is to cease grazing livestock within any area where such inhabitant is not permitted to graze livestock in terms of paragraph (d);

(g) measures appropriate for the conservation and proper use of any wildlife in the grazing area;

(h) the division of grazing land into paddocking for seasonal and rotational grazing;

(i) the sustainable utilization of thatch grass in the grazing ara; and

(j) the marking of arable land by fencing.

(3) An order which is intended to be general application throughout the communal or resettlement areas shall—

(a) be recorded in a book kept for that purpose; and

(b) specify the date upon which it is to come into operation; and

(c) specify and describe the area affected; and

(d) be read out at a public meeting of the council called for that purpose; and

(e) be signed, dated and certified by the person who read it in terms of paragraph (d) as having been read out in terms of that paragraph.

(4) For the purposes of paragraph (c) of subsection (3), the provisions of subsection (9) of section 4 shall apply *mutatis mutandis*, to the description of the area referred to in that paragraph.

(5) An order—

(a) addressed to an individual shall come into operation immediately;

(b) having general effect shall come into operation one week after the order is read out in terms of paragraph (d) of subsection (3).

(6) The book in which orders are recorded in terms of paragraph (a) of subsection (3) shall be available for inspection at the council offices by any inhabitant of the affected area during normal working hours.

(7) An order made in terms of this section may be amended or revoked by the council.

Fencing and conservation works

9. Any person who—

(a) damages, destroys or removes any fence within a communal or resettlement area or on the boundary of a communal or resettlement area; or

(b) damages or destroys any conservation works in any area to which these regulations apply;

shall be guilty of an offence.

(d) fails to destock at the rate and within the period stipulated in the plan; or

(e) fails to remove his livestock within the stipulated period in the plan; or

(f) cultivates in an area other than a cultivation area: or

(g) fails to carry out any land protection measures which have been assigned to him in a plan; or

(h) contravenes any term, condition or control measure in a plan; or

(i) removes, collects, cuts, harvests or hunts natural resources or vegetation within the council area without the authority of the council, shall be guilty of an offence.

(2) Any person who contravenes any provision of these by-laws or any order made in terms of section 8 shall be guilty of an offence.

(3) Any person who is convicted of three or more offences under subsection (1) may have his rights under the plan revoked by the Council.

(4) Any person who is guilty of an offence in terms of these by-laws shall be liable to a fine not exceeding five hundred dollars or to imprisonment for a period not exceeding twelve months or both or such fine and such imprisonment.

97-752 ENR
August 5, 1997

Congressional Research Service
Report for Congress

African Elephant Issues: CITES and CAMPFIRE

M. Lynne Corn & Susan R. Fletcher
Enivronmental and Natural Resources Division

Summary

The conservation of African elephants has been controversial recently on two fronts: the Convention on International Trade in Endangered Species (CITES, to which the United States is a party), and a Zimbabwean program for sustainable development called CAMPFIRE, which is partially funded by the U.S. Agency for International Development (USAID). The members of CITES recently voted to down-list elephant populations in three African nations, thereby allowing limited trade in elephant products from those countries. The United States voted against the change. USAID's role in CAMPFIRE is supported by some conservation and hunting organizations and opposed by some animal welfare organizations, which also claim violations of U.S. laws prohibiting lobbying by recipients of federal grants. Opponents are asking Congress to restrict appropriations for CAMPFIRE in the foreign operations bill.

Two controversies have sprung up recently about the African elephant. One is the changing status of this species under the Convention on International Trade in Endangered Species (CITES), of which the United States is a signatory. The other is over a program in Zimbabwe called "CAMPFIRE." The partial funding of this program by the U.S. Agency for International Development has been criticized by animal welfare groups and some conservation groups, though it has been supported by other conservation groups as well as many hunting organizations. (See Endnote 1.)

Elephants in CITES

African elephants' tusks have been used in jewelry, piano keys, and hanko, the personalized signature seals required on official documents in Japan. Their hides and other parts are a minor component of trade, but their meat is used by local people, and the species is highly prized among big game hunters. Elephants are, however, a severe agricultural pest in many areas. Where they are not hunted (and therefore not conditioned to avoid humans), their effects on subsistence farmers may be devastating. For many years, intense poaching of elephants for their ivory was a serious conservation problem, and many

countries faced serious declines in elephant populations. Between 1979 and 1989, the speciesþ population was estimated to have dropped from 1.2 million to 600,000.

The species (See Endnote 2.) is listed under the U.S. Endangered Species Act as threatened. In 1978, it was listed under Appendix II of CITES. Commercial trade in Appendix II species is allowed if it is not detrimental to the species. The enormous disparity in the success of African countries in managing their large mammals has contributed to the heat of this debate. Many African countries lacked the means (and in some cases, the will) to control the taking of the species. At the same time, some countries, including South Africa, Zimbabwe, Botswana, and Namibia, have had a history of firm control over their elephant populations, and a surplus of elephants. They have generally allowed controlled hunting, often integrating it into village economies and securing revenues for conservation and park programs.

In 1989, in a vote supported not only by most nations of the northern hemisphere, but also by many in Africa, CITES members voted 76 to 15 to reclassify African elephants under Appendix I. The more protective Appendix I listing means that virtually no trade is permitted between two nations if either is a signatory to the convention. Since the prime markets for ivory are in Europe, North America, and particularly Japan, all of which are parties to CITES, even those countries with well-managed, abundant populations found that their markets had disappeared.

As a result of the ivory ban, populations in some countries rose. Careful management combined with aggressive anti-poaching measures led to increasing elephant populations. Many African countries were well-pleased to see poaching decline domestically, but those with abundant populations began to claim a rise in agricultural losses, a decrease in hunting revenue flowing into parks and conservation, and greater antagonism to wildlife among local people. They also resented what they viewed as unwarranted international interference in programs they viewed as well- run. These nations, primarily in southern Africa, began to push for at least a partial lifting of the trade restrictions.

Tenth Conference of Parties. In June 1997, Zimbabwe hosted the 10th Conference of the Parties (COP10) of CITES. Before the member nations were three proposals (one for each country) to list the elephant populations of Zimbabwe, Botswana, and Namibia on Appendix II, thereby allowing a managed trade in elephants and elephant parts (including ivory) from those countries. The proposals would have allowed individual export quotas for each country to Japan only, trade in hunting trophies, and trade in live animals þto appropriate and acceptable destinations. When the proposals were offered at COP10, they were initially tabled (with U.S. support). But after intense lobbying by the three nations as well as by South Africa, the proposals were modified (a) to impose strict quotas for a one-time sale; (b) to lift the ban only after 18 months; and (c) to limit exports of hunting trophies to non-commercial purposes. On a secret ballot, these modified proposals passed, with strong support of many countries in South America which view themselves as facing similar problems. The United States voted against the amended proposals as well. African delegates reportedly celebrated, viewing the vote as a mark of respect from developed countries for the success of wildlife management programs in these three countries. In the United States, animal rights groups were deeply disappointed, while conservation and hunting groups were largely supportive.

As a result of the vote, sometime after December 1998, Botswana, Namibia, and Zimbabwe will be allowed to sell 25.3, 13.8, and 20.0 metric tonnes of ivory respectively to purchasers in Japan. Resources from these sales will help local people, the countriesþ wildlife programs, and their national treasuries. Critics counter that resumption of the ivory trade will also lead to resumption of poaching in other countries and a return to declining elephant populations, as poachers try to take advantage of the legal

market by disguising the illegal origin of their ivory products. Other critics feel, quite simply, that the killing of these animals is immoral, and should be stopped.

Controversy over the CAMPFIRE Program

A major controversy over U.S. Agency for International Development (USAID) funding for the "CAMPFIRE" (Communal Areas Management Programme for Indigenous Resources) Program in Zimbabwe has emerged following a campaign over the past year by the Humane Society of the United States (HSUS) to oppose elements of the program. The HSUS, and other organizations that have endorsed the campaign, object to elements of the program that include the licensing of trophy hunting for big game, including elephants, and alleged illegal lobbying efforts to "down-list" protected species, especially elephants, under CITES and to allow trade in products from these species. USAID officials contend that USAID money supports the broad program, which does include trophy hunting, but that U.S. funding is not being used directly for these purposes.

How CAMPFIRE Works

USAID began funding the CAMPFIRE Program in 1989. The CAMPFIRE program aims to build the capacity of local authorities to manage natural resources and wildlife in order to increase incomes of rural people and to help them provide for basic needs of their communities.

USAID reports that the program is implemented through grants to non-governmental organizations and some local authorities. These include grants to participating Rural District Councils for training and capacity building such as improving nature-based tourism infrastructure; to the Worldwide Fund for Nature (WWF) for ecological and biological research and training in wildlife and habitat management and other activities, such as natural resource inventories and environmental impact assessments; to the Department of National Parks and Wildlife Management for research, establishing carrying capacity and allowable hunting quota proposals; to the Zimbabwe Trust (Zimtrust) for activities such as training at district, ward, and village level in management and planning skills, monitoring growth and development of technical and financial capacities at the district level, and providing environmental education and public information services; and to other organizations.

Since the inception of CAMPFIRE, USAID notes that land in Zimbabwe dedicated to conservation has more than doubled, to over 30% of the country, and that the elephant population has increased from under 50,000 to over 65,000. This period also saw the banning of the ivory trade under CITES, which is also credited with curtailing the killing of elephants not only in Zimbabwe, but in all of Africa.

USAID notes that some 90% of revenues generated by CAMPFIRE in 1995 were from leasing sport hunting concessions to commercial safari operators. Sport hunting involves a wide array of animals; according to USAID officials, some 100 to 150 licenses to hunt elephants are issued per year for hunting in the communal lands under the CAMPFIRE program. (Zimbabwe issues a total of about 300 licenses to hunt elephants on all lands annually). About two-thirds of this sport hunting revenue is from the licenses to hunt elephants. A license to hunt an elephant is priced at $10,000 to $15,000, compared to the roughly $800 to $1,500 for lions, for example. USAID also says that such sport hunting licenses are strictly controlled and monitored by local authorities, and that revenues go directly to Rural District Councils, who decide both how the money is to be raised (whether to allow and manage sport hunting, for example), and how it is to be spent.

As part of USAID's Natural Resource Management Program in Zimbabwe, the agency provided approximately $7 million to the CAMPFIRE program over the period 1989-1994, with another $20

million from 1995 through 1999. The $2.9 million appropriation requested for FY1998 would complete the $28.1 million USAID had planned for its participation in CAMPFIRE, and USAID does not expect that additional funding would be provided by the United States after FY1998.

Controversial Issues: Elephant Hunting and Allegations of Lobbying. Critics of CAMPFIRE argue that U.S. tax dollars should not be used to support hunting of elephants in any way. They also argue that USAID money should not be given to any organization involved in lobbying for reduced protection for species that U.S. policy protects, such as the African elephant.

Proponents of the program argue that by providing local communities with the means to participate in the benefits of wildlife management, including sport hunting, it gives local farmers incentives not to kill animals that eat or damage their crops. Thus, they argue, the program is an important means of addressing the conflicts between growing human populations practicing agriculture on communally owned lands, and wild animals that have destroyed crops and sometimes killed humans--conflicts that have led to the killing of elephants and other animals.

USAID argues that the CAMPFIRE program does not directly support elephant or wildlife hunting, which is legal in Zimbabwe, and which would be licensed by the government anyway. The CAMPFIRE program, they say, enables local communities to develop the ability to manage activities taking place on their lands--which may include limited elephant hunting--as well as to receive the financial benefits from these activities.

The controversy over lobbying activities has centered on activities of the Africa Resources Trust (ART), a Zimbabwe- based non-governmental organization that received funding under the CAMPFIRE program. The HSUS objected to activities of ART that, it asserted, involved lobbying outside Zimbabwe, including at the CITES COP10 meeting to change some wildlife designations and allow trade in wildlife products, including elephant ivory.

In order to respond to critics of the CAMPFIRE program, USAID reports that it initiated investigations of how its money has been spent in the CAMPFIRE program. The USAID Office of General Counsel investigated allegations that the Washington office of ART had engaged in lobbying on CITES and the Endangered Species Act; the General Counsel reported that it established that ARTþs activities involved allowable information development and dissemination that did not fall within the legal definition of lobbying. ART reportedly has amended its USAID contract to explicitly disallow use of USAID funds for its activities outside Zimbabwe. Attempts to influence decision- makers outside the United States in forums such as the CITES meeting do not fall within the scope of U.S. legislation prohibiting lobbying of the U.S. Congress or within the United States, and ART argues that it acted in these forums only facilitate the participation of African officials and community spokespersons. It was those African participants who voiced opinions in favor of down- listing elephants and allowing some resumption of ivory trading, according to ART.

The ambassadors from four African countries--Botswana, Malawi, Namibia, and Zimbabwe--have sent joint letters of support to USAID for continued funding of natural resources programs, and disputing the HSUS opposition to the limited trophy hunting they allow. They support the CAMPFIRE program, and point to broad benefits to rural Africans.

Environmental groups are somewhat at odds among themselves about the CAMPFIRE program. While some have joined the HSUS in opposing aspects of the program, several other major groups strongly support the program without modification, arguing that wildlife will be best protected when the people living in the same area reap economic benefits from them through tourism or hunting, and that CAMPFIRE as it currently operates has been very successful in this regard.

A position endorsed by both the Humane Society and the Africa Resources Trust, as well as USAID, has emerged in amendments to U.S. foreign operations appropriations, which would approve USAID funding for CAMPFIRE, but would explicitly ban the use of USAID dollars from supporting or promoting trophy hunting or actions to promote trade in animal products from endangered or threatened species. This position recognizes the value of the over-all program, but would dissociate USAID funding from the trophy hunting element and activities outside Zimbabwe on influencing international policy.

Some observers who support the CAMPFIRE program express concern that banning U.S. aid dollars from supporting or promoting trophy hunting could in effect limit U.S. support for the broader goals of the CAMPFIRE program which include strengthening the capacity of local authorities to monitor and enforce hunting licenses; they point out that these governments will continue to allow such hunting whether or not USAID is involved in the CAMPFIRE program. A ban on U.S. support for one element of the program would, they argue, be hard to separate from the total program, and might result in curtailing beneficial aspects of the program.

CAMPFIRE Legislation in the 105th Congress. When the Senate approved the Foreign Operations appropriation (S. 955), it included the "Boxer Amendment," offered by Senator Barbara Boxer, which allowed up to $2.9 million for CAMPFIRE, provided that "none of the funds appropriated by this Act may be used to directly finance the trophy hunting of elephants or other endangered species as defined in . . . (CITES) or the Endangered Species Act: Provided further, That the funds appropriated by this Act that are provided under the CAMPFIRE program may not be used for activities with the express intent to lobby or otherwise influence international conventions or treaties, or United States government decision makers...." Both USAID and the HSUS agree that this language is an acceptable solution to the controversy over CAMPFIRE.

The House Committee on International Relations, in House Report 105-176 on H.R. 2159, the Foreign Operations appropriation bill, acknowledged the concerns that have been raised about the CAMPFIRE program, but expressed satisfaction with the accomplishments and the approach of the program. The Committee endorsed an explicit ban on activities that would lead to renewed ivory trading, and on USAID funding for non-governmental organizations that conduct lobbying activities.

The Fox-Miller amendment pending in the House of Representatives, introduced by Representatives Jon Fox and George Miller, is similar to the Boxer Amendment. However, wording that includes a ban on activities that both support and "promote" elephant trophy hunting remains a problem, according to USAID, because they argue that it would be difficult to interpret in the field and would probably produce unworkable limits on U.S. participation in CAMPFIRE. Opponents of this amendment include sport hunting interests that argue the program as constituted has been very successful in elephant conservation, and could be less successful if these limitations were enacted.

ENDNOTES

(1) There are two distinct schools of western thought on animal protection that affect the debate over management of African elephants. In the older school, the species or population is the unit of conservation, and organisms may be used or killed, provided that the population as a whole remains stable and healthy. In the newer school, individual organisms have value, and are to be preserved for their own sakes, regardless of the health or even abundance of the population. Where a species is rare, the interests of these groups converge; where it is common, they conflict. Thus, groups from the two schools could work harmoniously on conserving elephant populations in Kenya or Burundi, while opposing each other in Zimbabwe or South Africa.

(2) The African elephant (Loxodonta africana) is the only elephant found in Africa. The Asian elephant (Elephas maximus) is found only in southern and southeastern Asia, and is also on Appendix I. Legalization of some African elephant ivory could affect poaching of the Asian elephant.

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Poverty and Wildlife Conservation

Description

Click on the link below to watch a short movie from Poverty Environment.net website about initiatives that help protect the wildlife while alleviating poverty. As illustrated in this short film, this project will, among other benefits, help protect both highland and lowland corridors of the landscape, effectively manage unprotected forests and ecosystem services and secure local livelihoods.
http://povertyenvironment.net/node/2240

Case Study: CAMPFIRE Project

An example of how economic incentives can help both alleviate poverty and preserve the environment is the Zimbabwe wildlife management project, called **Communal Areas Management Program for Indigenous Resources** and abbreviated CAMPFIRE.

Note: The following is an adaptation from the CAMPFIRE report found on PovertyEnvironment. net website (read the whole report here: http://povertyenvironment.net/files/CASE%20Zimbabwe.pdf)

Zimbabwe is a landlocked country in Southern Africa, bordering Mozambique and South Africa, with a population of approximately 13 million people. Zimbabwe has experienced a history of violence and political intimidation. More than 36% of the population lives below the international poverty line of 1US$/day. Although President Mugabe's government has since 1990 embarked on economic reforms, they have failed to halt a slide in living standards, mainly as a result of excessive government expenditure and rising corruption.

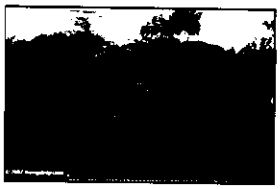
The CAMPFIRE project is an example of community based wildlife management. The Mahenye ward is a small community that covers 210 square kilometres in the south-eastern district of Chipinge. Mahenye has two tourist lodges. The area is inhabited by approximately 3.700 Shangaan people. Population density is low. Erratic rainfall patterns constrain locals from intensive livestock keeping and cultivation of crops such as maize, sorghum, millet and groundnuts. Consequently, wildlife remains an important natural asset that generates income for the people of Mahenye.

The CAMPFIRE project bestows the local community more responsibility in wildlife conservation and related management activities. A partnership with private tourism enterprises exploits two tourism lodges, providing jobs and revenues to the community. A wildlife committee was elected as a sounding board for the community. This committee uses revenues from increased hunting quota and tourism to develop community projects. The wildlife committee also designed a land-use plan, setting aside a wilderness area for wildlife. Management activities carried out by the community include fire control, game capture and relocation, provision of water supplies and resource monitoring.

Benefits of CAMPFIRE project for poverty reduction

Most benefits of the CAMPFIRE project have accrued to local people, providing them with a route out of poverty. Under the CAMPFIRE project, proceeds from wildlife accrued to the communities. Job opportunities for locals and revenues from tourism have increased local incomes considerably. The distribution of money from tourism resulted in a positive change of community attitudes to wildlife and of parks officials toward community members. The wildlife committee has distributed the revenues equitably. As table 2 shows, a considerable amount of money is paid out as direct income to households. The rest of the money was divided under three headings: administration, management and projects. In times of droughts, this money assists households to buy food.

Another asset arising from Mahenye's involvement in CAMPFIRE is the development of infrastructure, improved health sanitation and better



communication systems. Projects developed with CAMPFIRE revenue include electrification and piped water, classrooms and teachers houses, two grinding mills and a clinic. These projects have contributed to the general welfare increase in the local community. The people of Mahenye also point out that the construction of tourist lodges in the community led to improved road transport. As a result of their involvement in the CAMPFIRE project, the people of Mahenye are building a range of community capacities that are enabling them to confront political and economic exclusion. The wildlife committee is a strong focal pint of community pride in its ability to plan and manage wildlife. Self-sustaining programmes driven by locals reflect Mahenye's growing strategic political capacity.

Benefits of CAMPFIRE project to the environment

The CAMPFIRE project is not aiming directly to increase protected areas for wildlife; it gives local communities custody and the responsibility to manage wildlife and tourism activities in their area. The project did, however, encourage conservation of wildlife. Ecological benefits include the near elimination of illegal poaching activities and the reservation of about 37,000 acres wildlife conservancy in which trophy hunting and ecotourism takes place. While Zimbabwe is among the leading countries in wildlife management in the region, the government acknowledges that one of the major weaknesses of its environmental laws is fragmentation of responsibilities among different departments. The efforts of the Ministry of Environment and Tourism, created in the early 1990s, are sometimes frustrated by other government ministries and departments with competing interests.

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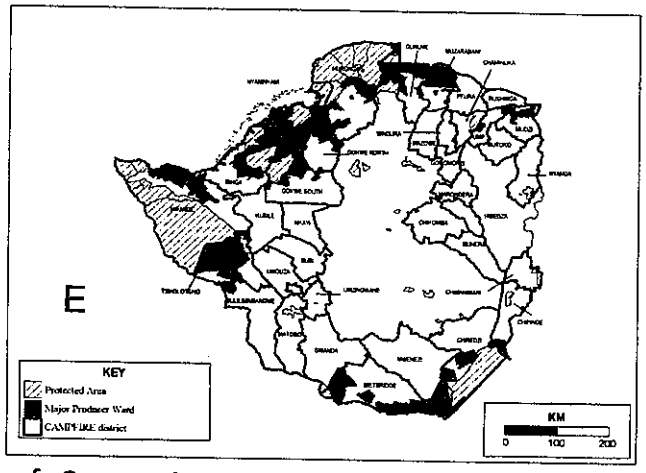
TROPHY IMPORTS SUSPENSION AND THE CAMPFIRE PROGRAM

1. Introduction

The Community Areas Management Program for Indigenous Resources (CAMPFIRE) is premised on the conservation of wildlife and other natural resources as a livelihood option for rural communities in marginal areas of Zimbabwe. 58 out of a total of 60 districts in the country are members of the program, although just 16 of these are regarded as "major" CAMPFIRE Areas in which income generation is primarily through big-game trophy hunting. The CAMPFIRE Association provides interface with districts to enhance training and capacity for data collection; and community awareness on protocols for problem animal management and anti-poaching.

Distribution of Wildlife Producer Wards



As the forerunner of Community Based Natural Resources Management (CBNRM), CAMPFIRE has significantly influenced and contributed to similar models throughout southern Africa where CBNRM is now generally accepted and practiced. At international level, CAMPFIRE has been influential in supporting the rights of local people to manage and benefit from their own natural resources, and in developing an understanding of sustainable wildlife utilization and common property management. This is a testimony to the efficacy of the principles upon which the program is based. The United States Agency for International Development (USAID) was a major funder of CAMPFIRE from 1989 under the Natural Resources Management Project (NRMP I). Initial support targeted four districts, namely Tsholotsho, Hwange, Bulilima, Mangwe and Binga in Matabeleland. Wildlife management activities by the then Department of National Parks and Wildlife Management, now Parks and Wildlife Management Authority, were also supported in the Hwange-Matetsi complex. The successor USAID funded program (NRMP II) extended support beyond the limited number of districts and embraced CAMPFIRE in its totality from 1995 to 2003. This support helped CAMPFIRE to expand beyond wildlife conservation and use, to the conservation and use of range lands, and forest resources through the provision of funding to 24 districts and several community projects.

At present, CAMPFIRE generates on average US$2 million in net income every year which is much lower than estimated potential earnings for the Program. Income generation is mostly through the lease of sport hunting rights to commercial safari operators, as well as sales of hides and ivory, tourism leases on communal land and other natural resources management

activities. As an industry, safari hunting has proven to be robust both environmentally and economically and, although not unscathed, has also proved fairly resilient in the face of serious socio-political uncertainty. Potential earnings for communities could be multiplied many times over through more efficient management and regulation of CBNRM enterprises and, most importantly, through direct participation of communities in all levels of the value chain.

Although human encroachment and poaching has affected some communal wildlife areas in recent years, the CAMPFIRE program at national level still protects an area of wild land in excess of 50,000km^2, which is roughly equivalent in extent to the Parks and Wildlife Estate (Table 1). There are over 200,000 households that actively participate in the Program in CAMPFIRE hunting areas. Revenue received by communities, though relatively small, is used to directly offset the costs of living with wildlife through employment of game scouts or resource monitors.

Table 1: Poaching in High Elephant Population CAMPFIRE Areas

District	2010	2011	2012	2013	Action
Binga	2	3	4	7	37 arrests, 28 pieces of ivory recovered
Mbire	3	3	5	3	36 pieces of ivory and 1 rifle recovered
Hwange	0	1	1	5	4 arrests, 1 pair of ivory recovered
Nyaminyami*	20	17	14	8	14 pairs of ivory recovered, no arrests
Tsholotsho	0	1	5	7	Poisoning in 2012-13
Bulilima	0	0	0	3	Poisoning
Gokwe Nrth	0	4	1	1	2 pieces of ivory recovered
Chipinge	0	1	1	0	No arrests
Totals	**25**	**30**	**31**	**34**	

Source: RDC CAMPFIRE Annual Reports October 2013

*Nyaminyami district is a MIKE Site, data includes recorded natural mortalities

2. Human and Elephant Conflict in CAMPFIRE areas

Rural communities under CAMPFIRE, derive their livelihoods from subsistence farming of drought resistant crops. The main crops produced are sorghum, maize, pearl millet, cowpeas, and other cash crops. Environmental changes are negatively impacting on farming in these areas as the fertility of the land is gradually decreasing, affecting both the quality and quantity of harvests and impacting negatively on food security. Livelihoods of these communities are complemented by the revenue generated from the sustainable utilization of natural resources, especially trophy hunting of elephant. In addition to climate factors, the abundant and thriving population of elephants has greatly contributed to very poor agricultural output with most fields totally destroyed every cropping season (Table 2). Disgruntled communities easily become willing tools for sophisticated wildlife poaching syndicates.

Table 2: Incidences of Human and Elephant Conflict in selected districts in 2012

District	Incidences of Human and Elephant Conflict
Mudzi	14 Families in 3 wards affected, 10 hectares of crops destroyed
Tsholotsho	45 families affected in 11 wards, 40 hectares of crops destroyed

Hwange	19 wards affected, especially Chidobe, Kacheti, Chikandakubi, Silewu, Makwandara and Mabale Wards
Bulilima	13 wards affected, especially Makhulela and Madlambudzi Wards, over 50 hactares destroyed
Nyaminyami	13 families lost family members, 10 families lost property, crop loss in 9 wards
Chipinge	Crop loss in 2 wards
Vungu	1300 households in 3 wards lost crops
Matobo	3 wards, 22 hactares destroyed
Mbire	0.4 hectares per household lost annually to wildlife

Source: RDC CAMPFIRE Annual Reports October 2013

There is generally no fencing separating wildlife from people, as villages share close boundaries with wildlife areas, with some settlements located in close proximity to state protected areas. This results in the sharing of water and grazing between people and elephants. Conflict with elephant is most intense when elephants raid field crops, stored harvests and property during the night. In most cases, villagers end up harvesting immature crops, which reduces both crop yield and value. During winter months, surface water supplies dwindle resulting in other forms conflict such as destruction of water sources and installations, threat and loss of human life, and vegetation destruction (Table 3). Not all incidents of problem animals are reported, as CAMPFIRE staff generally lack the capacity to attend to every report on time. In addition, there are restrictions of people's movements, and their access to essential commodities such as firewood. On average communal farmers in the buffer area spend about two months per year guarding their staple crops from wildlife. Guarding is mostly done at night, and costs farmers untold hardships, additional expenses, and even injury and death. CAMPFIRE communities have developed their own locally acceptable compensation mechanisms, such as full support towards burial expenses in cases of loss of life, and education for school going orphans.

Table 3: Human and Elephant Cases for four Hot Spot Districts 2009 to 2011

District	Cases	Humans Killed	Humans Injured
Binga	36	8	0
Mbire	6	5	1
Hwange	289	2	1
Tsholotsho	41	0	0
Totals	**372**	**15**	**2**

Source: RDC CAMPFIRE Annual Reports 2009-2012

Investments have been made over the years to mitigate human and elephant conflict by a number of conservation projects supported through the World Wide Fund for Nature (WWF), Safari Club International Foundation (SCIF) and the Food and Agriculture Organisation (FAO). A Human and Wildlife Conflict (HWC) Interpretation Centre has been established within the CAMPFIRE Association offices to provide knowledge services.

3. Revenue from hunting in CAMPFIRE areas

A participatory quota setting methodology adaptively adjusts quotas in response to animal numbers, trophy quality, community monitoring, illegal off-take and safari operator "catch effort". Revised CAMPFIRE Revenue Sharing Guidelines, which were incorporated into the

Constitution of the CAMPFIRE Association (CA) in 2007, prescribe that at least 55% of revenues should be devolved to producer communities, no more than 26%, and 15% for management and overheads (respectively) at RDC level, and 4% as a levy to the CAMPFIRE Association. At least 10 RDCs are in compliance with the Revenue Guidelines, and in these districts CAMPFIRE revenue is paid directly into community controlled bank accounts by safari operators (Table 4).

Table 4: An Example on Allocation of CAMPFIRE Revenue

BULEMBI SAFARIS advice to Campfire Association on fees paid #1

TROPHY FEE US$ PAYMENTS 2011

CLIENT NAME	TR 2 NO.	TROPHY FEES	RDC FEES DUE 41%	ASSOCIATION DUES 4%	WARD 3 DUE 55%	WARD 4 DUE	WARD 5 DUE	WARD 6 DUE	WARD 7 DUE	TOTAL PAYING
[redacted]	020810	$ 9,250.00	$ 3,792.50	$ 370.00	$5,087.50	$ -	$ -	$ -	$ -	$ 9,250.00
	020811	$ 13,440.00	$ 5,510.40	$ 537.60	$7,392.00	$ -	$ -	$ -	$ -	$ 13,440.00
	020813	$ 5,000.00	$ 2,050.00	$ 200.00	$2,750.00	$ -	$ -	$ -	$ -	$ 5,000.00
	020812	$ 2,100.00	$ 861.00	$ 84.00	$1,155.00	$ -	$ -	$ -	$ -	$ 2,100.00
										$ -
TOTAL			12,213.90	1,191.60	16,384.50	$ -	-	-	-	$ 29,790.00

An analysis of data presented in October 2013 as part of an Economic Valuation, Ecosystem Based Adaptation and Resilience and Biodiversity Mainstreaming for the Revision of the Zimbabwe National Biodiversity Strategy and Action Plan (NBSAP) by A. M. Madzara 2013, provides an estimated total of US$2,496,349 from hunting in 2012 (Table 5). Hunting contributes an average of 90% of CAMPFIRE revenue annually.

Table 5: 2012 Hunting Revenue by District

District	Income (US$)
Beitbridge	135,920
Bililima	102,600
Binga	101 382
Chipinge	76,960
Chiredzi	440,645
Gokwe North	47,481
Hurungwe RDC	65,438
Hwange	71,388
Matobo	11,629
Mbire	726,748
Mudzi	1,500
Nyaminyami	454,768
Tsholotsho	306,672
Umguza	33,000
Vungu	21,600
Total 2012 estimate	**2,496,349**

Source: CAMPFIRE Coordinators Annual Reports 2013

Five out of 13 districts contributed 84% of the hunting revenue. This shows the extent of variability between districts. An assessment of 18 main CAMPFIRE districts allocated hunting quotas for 2014 shows that 106 out of 167 Bull Elephant hunts were booked by US citizens (Table 6). Elephant trophy hunting contributes more than 70% income to the CAMPFIRE program.

Table 6: 2014 Trophy Elephant Hunt Bookings in CAMPFIRE Areas

DISTRICT/CONCESSION	APPROVED QUOTA*	US CLIENTS	NON US CLIENTS
Beit Bridge: East	4	2	2
Beitbridge: West	5	5	0
Beitbridge: Sentinel/Pingwe	2	2	0
Binga: Songo	2	0	2
Binga: Manyenyengwa/Siabuwa	2	0	2
Binga: Manjolo West	4	2	2
Binga: Devils Gorge	1	0	1
Binga: Lusulu	2	0	2
Bubi: Area 1	2	1	1
Bubi: Dromoland	1	0	1
Bubi: Mbembesi	1	0	1
Bulilima: Maitengwe	6	6	0
Bulilima: Dombodema	4	4	0
Chipinge: Mahenye	7	7	0
Chiredzi: Naivasha	6	4	2
Chiredzi: Sengwe 1	5	4	1
Chiredzi: Sengwe 2	4	3	1
Chiredzi: Chitsa	4	4	0
Chiredzi: Malipati CA	3	2	1
Chiredzi: Malipati SA	4	4	0
Chiredzi: Chibwedziva	5	2	3
Gokwe North: Area 1	3	2	1
Gokwe North: Area2	2	0	2
Gokwe South	4	0	4
Hurungwe: Chewore South	4	2	2
Hurungwe: Charara South	1	0	1
Hurungwe: Mkwichi	3	0	3
Hurungwe: Pfundundu	1	0	1
Hurungwe: Rengwe	2	0	2
Hwange: Communal/Stateland	8	7	1
Hwange: Kamativi	5	0	5
Mangwe: Shashe	1	0	1
Matobo RDC Shashe Block	2	2	0
Mbire: East	6	4	2
Mbire: North	5	5	0
Mbire: South	4	1	3
Mudzi and Rushinga RDC Nyatana Wilderness	3	0	3
Muzarabani RDC Area 1	2	2	0
Nyaminyami RDC Area 2 Omay	5	5	0
Nyaminyami RDC Area 3 Gachegache	2	2	0
Nyaminyami RDC Area I Omay	5	5	0
Tsholotsho RDC Area 1 North	11	6	5
Tsholotsho RDC Area 2 South	11	9	2
Umguza RDC	3	2	1
TOTAL RDC Hunting Areas	**167**	**106**	**61**

* Total Quota excludes Tuskless Elephant

4. Photographic tourism revenue

Photographic tourism contributes an estimated 1.8% of total CAMPFIRE revenue annually according to 2006 evaluation reports on CAMPFIRE (Table 7).

Table 7: % of Total Income earned by CAMPFIRE by source of income

Income by activity	Hunting	Photographic Tourism	Sale of Hides	Other	Total
1989-2001 (Kumalo 2003)	89.5	2.3	5.7	2.5	100
1989-2006 (WWF database)	90.26	1.75	3.32	4.36	100

CAMPFIRE invested significantly towards the development of Photographic Tourism in communal areas through the United States Agency for International Development (USAID) between 1999 and 2003. There are a total of 21 facilities (Table 8) which are managed either in partnership with private sector (five facilities) or by Community Trusts (16 facilities). Private sector players operate these ventures under tripartite lease agreements with RDCs and communities who are the major beneficiaries. Current revenue data from the 21 photographic tourism facilities is not available, as activity in these camps has been low over the last ten years. Due to lack of investment, most of the facilities are semi functional.

Table 8: CAMPFIRE ecotourism facilities

District	Facility	Management
Chipinge	Chilo/Mahenye Safari Lodges	Private Partner
Binga	Masumu River Lodge	Private Partner
Hwange	Gorges River Lodge	Private Partner
Umzingwane	Embizeni Lodges	Private Partner
Nyaminyami	Gache Gache Lodge	Private Partner
Nyanga	Gairezi Lodge	Community Trust/Pvt – Functional
Umzingwane	Mtshabezi Cultural Village	Community Trust/RDC - Functional
Matobo	Ntunjambili Day Centre	Community Trust/Pvt - Semi-functional
Guruve	Karunga, Masoka Camps	Community Trust/Pvt - Functional
Muzarabani	Mavuradona Wilderness	Community Trust/Pvt - Functional
Binga	Binga Cultural Village	Community/RDC - Non-functional
Hurungwe	Sanyati Lodge	Chapungu Safaris - Functional
Hwange	Chezya Fishing Camp	Community Trust - Non-Functional
Matobo	C J Rhodes Cultural Village	Community Trust - Functional
Pfura	Pfura Mountains Camp	Community Trust/RDC - Functional
UMP	Sunungukai Camp	Community – Functional
Mazowe	Banje Mountain Camping	Community Trust - Non-functional
Goromonzi	Ngomokurira Hills	Community Trust - Non-Functional
Bindura	Paradise Pools Day Centre	Community Trust/RDC - Non-functional
Chimanimani	Vhimba Eco-tourism	Community Trust/RDC – Functional
Manyame	Mayambara Ecotourism	Community Trust/Pvt - Non-functional

5. Revenue from other sources

Other revenue sources to CAMPFIRE include fisheries, sand and quarry extraction, harvesting of ilala and masawu (wild fruit), beekeeping, sale of ivory and hides and logging of indigenous timber. Other income sources combined with ecotourism contribute about

10% (Table 9). In 2012, four districts in the Lower Zambezi area initiated REDD+ projects in partnership with the private sector.

Table 9: Revenue from other sources (non hunting and photographic activities)

Year	Other Revenue Source (US$)	All income from CAMPFIRE (US$)
1989	23,013.38	349,811.38
1990	103,008.85	556,432.85
1991	137,868.06	776,021.06
1992	62,596.21	1,216,678.21
1993	89,813.18	1,483,873.18
1994	89,127.73	1,642,670.73
1995	114,755.17	1,591,567.17
1996	99,573.59	1,755,911.59
1997	136,965.49	1,861,271.49
1998	103,788.96	1,891,765.96
1999	813,592.11	2,753,958.11
2000	185,224.10	2,105,204.10
2001	186,146.43	2,328,452.43
2002	596,777.02	4,613,204.02
2003	234,155.92	2,803,154.92
2004	164,060.24	1,495,405.24
2005	0.12	786,719.12
2006	239,595.00	2,258,645
2007	#VALUE!	no data
2008	#VALUE!	no data
2009	526,812.41	1,012,174
2010	41,819.00	1,306,423
2011	27,649.79	1,924,404
2012	474,973.00	2,539,048

5.1 Value of CAMPFIRE ivory stockpile

Due to the CITES controls in trade in elephant and its specimens, all ivory from CAMPFIRE Districts, Forestry and Parks estate is stockpiled within the PWMA Head Office stores. Of the current stock that the Parks stores holds, about 16% belongs to CAMPFIRE communities. The current value of the CAMPFIRE ivory stockpile is estimated at US$2.5 million.

6. Gross revenue from CAMPFIRE areas

According to the Community Based Natural Resource Management Stocktaking Assessment Report by Mazambani and Dembetembe (2010), 45% of the gross hunting revenue goes to the CAMPFIRE whilst 55% goes to safari operators (Box 3). According to the same report, key stakeholders including safari operators realised a cumulative US$89 million between 1989 and 2006.

Box 3: Gross Revenue (USD) Realized by Key Stakeholders in the CAMPFIRE Program, 1989-2006

Stakeholders	USD	%
Producer Communities	20.8 million	23.4
Rural District Councils	17.6 million	19.8
CAMPFIRE Association	1.6 million	1.8
Safari Operators	48.9 million	55.0
TOTAL	**88.9 million**	**100.0**

Source Mazambani and Dembetembe (2010)

6.1 The multiplier effect of CAMPFIRE ecosystems goods and services

CAMPFIRE is widely acknowledged for its positive impact on rural livelihoods and the rural economy at large. CAMPFIRE has stimulated the rural economy in the following ways:

- In 2007 it was estimated that 777,000 households from 37 districts benefited from CAMPFIRE directly or indirectly. Given that 58 districts now participate in CAMPFIRE, it can be estimated that the number of direct and indirect beneficiaries exceeds 1 million.
- Frost and Bond (2008) estimate that about 12 districts out of the total participating districts have prime wildlife areas, covering 118 wards and benefiting approximately 121,550 households.
- In 2012 the revenue distributed directly to producer communities from 13 districts is estimated at US$1.4million. This reflects the amount of money injected into the rural economy.
- Data from 1994 to date (excluding 2007 and 2008) shows that CAMPFIRE accrued cumulative revenue of US$39million. Using the current revenue allocation system the amount accruing to the community wildlife producers is US$21.Smillion.
- Nearly 50 hunting concessions have been parcelled out by 28 CAMPFIRE hunting districts, and a total of 33 outfitters are contracted by RDCs to provide safari hunting services. The outfitters employ locals to provide hunting support services.

7. Use of CAMPFIRE income: Community projects

In all CAMPFIRE districts, revenue from hunting is used to support various management activities such as; fire awareness and purchase of fire-fighting equipment; opening of roads and fireguards; training of committees; look and learn tours to other CAMPFIRE districts; purchase of communication equipment; purchase of firearms for Resource Monitors; and rehabilitation of water supply systems to hunting areas. CAMPFIRE thus contributes to job creation, empowerment, and diversification of livelihoods for rural communities. Substantial investments are also made annually by RDCs and safari operators in problem animal control (PAC) and anti-poaching.

Most of the income has been invested in infrastructure which has long term benefits to local communities. Infrastructure such as clinics, schools, and grinding mills, boreholes, roads, fencing to keep out wildlife, has been set up in a number of districts (Table 10). Purchase of tractors and drought relief food by communities has also contributed to food security in

many drought prone CAMPFIRE areas. Children benefit from reduced walking distances through the construction of schools in the wards. Others benefit through procurement of learning materials and payment of school fees from CAMPFIRE proceeds. Communities also benefit from meat from safari hunting operations and occasionally from problem animal control.

Table 10: Summary of CAMPFIRE Revenue Funded Projects per District

District	Projects initiated between 1995-2013
Beitbridge	Rehabilitation of schools, clinics and irrigation schemes
Bililima*	Rehabilitation of 3 clinics and 3 primary schools, hall, fencing field and rehabilitation of lodge
Binga	Schools, clinics and sub offices, rudimentary elephant dung paper making, tanning
Bubi	No information was made available
Chipinge	3 grinding mills, lorry, teachers houses, community office, shop
Chiredzi	Clinic, teachers' houses, primary school, community-grinding mill, Police sub-office, piped water and electrification of clinic.
Gokwe North	6 grinding mills
Hurungwe RDC	Tillage tractors
Hwange	Agricultural inputs, goats restocking
Matobo	Organic farming gardens
Mbire	Clinic, nurses houses, office, storerooms, 14 classrooms, 7 teachers houses, grinding mill, school office, wildlife administration offices, 2 hand pump bore holes, water pipes, toilet, water storage tanks, 2 tractors, a tourist camp with 4 chalets;
Mudzi	Construction of Chingamuka primary and Chori pre-school
Nyaminyami	Tillage tractors, renovation of dispensary at clinic, nurse's house. Construction of Mayovhe classroom block, 3 grinding mills at $2 700.00 each, Teacher's house, Jongola sch. School bursaries x 3 students at Seke Teacher's College. Renovation of pre-schools x 2 x $3 000. Negande: Rehabilitation of water pipeline, grinding mill. Nebiri: Chikuro primary block, rehabilitation of Harudziva water pipeline. Kasvisva: Rehabilitation of water pipeline to supply water to Kasvisva clinic, Kasvisva Secondary school block. Msampa: Teacher's house, Majazu pry, renovation of ward warehouse; Kanyati: Cement for teacher's house renovation.
Tsholotsho	6 classroom blocks, clinic, 10 water engines, 2 F14 cottages
Umguza	Mlandwa secondary school
Vungu	Construction of primary school, borehole, dip tank

7.1 *Spotlight on Bulilima District: Community Projects 2011 - 2013

Each ward receives on average US$4,500 annually

Makhulela ward

Makhulela ward bought fencing wire from 2011 dividends to fence their fields. In 2012, 100 bags cement for a Mothers' Waiting Shelter, and in 2013 a further100 bags cement and timber for the clinic.

Ndolwane ward

In 2011, roofing of the administration block of Siyaphambili Sec School at a cost of $1000, and another $1000 shared between Khame and Gonde Primary schools. Eighteen Clinic mattresses bought in 2012. In 2013 100 bags of cement and fencing material for Malitigwe Hall.

Bambadzi ward

In 2011, administration block for Bambadzi Secondary roofed after being blown away by harsh winds. In 2012 and 2013 building material for Mbimba clinic.

Hingwe ward

In 2011 to 2013, cement for building Himago Secondary.

Madlambudzi ward

In 2011, paint for Madlambudzi Clinic. In 2012 building material for Madlambudzi Hall, and in 2013 fencing material for the Hall.

Khame ward

Fencing material in 2012 for Tematemе clinic. In 2013, doorframes and cement for Tematemе Clinic.

Huwana ward

Paint for Huwana Clinic in 2011. In 2012 and 2013, building material for Ntambana Primary School.

Gala ward

Building material for grinding mill in 2011, and in 2012 furniture for Kungubo Pry School and fence for Gala pry school. In 2013, water engine repairs.

Vulindlela ward

Cement and roofing material for Nlongwe Sec School in 2011, 2012 and 2013.

Dombodema ward

Furniture for Male Pry Schol and Mnigau Pry School in 2012.

Dombolefu ward

Paint for Mbwenda Pry School, and building material for Mathambo Pry School.

Nyele ward

In 2011, building material for Mzwanyana sec school, and in 2012 cement for Tokwana Clinic.

Malanswazi ward

Building material for Malanswazi clinic.

Other projects

Safari Operator drilled boreholes in 8 wards, bringing total in Maitengwe ward to 31, and an average of 4- 5 boreholes for other wards to benefit villages, schools and clinics.

8. Employment

The CAMPFIRE programme contributes to employment at local level. At district level, CAMPFIRE managers and officers, timber measurers, office clerks, and game scouts, while community projects employ resource monitors, tour guides, preschool teachers, grain millers, and bookkeepers are employed. A growing number of ordinary community members are also self-employed to service various CAMPFIRE activities. Safari operators employ managers, scouts, trackers, professional hunters, bookkeepers, drivers, cooks and camp minders.

A detailed survey of 16 districts shows that CAMPFIRE employs a total of 256 resource monitors/game scouts. In addition to this, RDCs employ CAMPFIRE coordinators who are supported by administration clerks. In 2013, Mbire District employed, 70 resource monitors, 80 people in fishing camps, and 100 people in hunting camps. An assessment of five districts in 2009 revealed that CAMPFIRE was 62% understaffed. The potential for increased impact of CAMPFIRE through employment is therefore high.

9. Conclusion

Arguably, although perhaps still falling short of their true potential, CAMPFIRE areas such as Mahenye in Chipinge, and Masoka in Mbire, for example, in which communities and community leadership have retained central involvement, promoted community awareness and played strong, proactive roles in CAMPFIRE, those areas have performed decidedly better – both from the point of view of community participation, benefit and development as well as from the point of view of contribution to conservation and protection of wildlife

and other Natural Resources. CAMPFIRE values sustainable good quality trophy hunting has supported regular training of game scouts and community awareness on wildlife management. The loss of this income stream will certainly increase the loss of confidence by communities in wildlife management, and consequently threaten tolerance and survival of the elephant. Community antipathy to wildlife and the reciprocal costs to wildlife is set to increase, especially through retaliatory killing or self-help problem animal control (PAC), and commercial poaching to feed international syndicates. Communities are disillusioned with the suspension of elephant trophy imports into the US, and are more likely than ever before to succumb to the temptation to open up more land for rain-fed agriculture in areas generally unsuitable for cropping leading to massive land degradation. The disruption of hunting revenue inflows and investment into the protection of wildlife and direct incentives at community level is a sure way to increase elephant poaching and human encroachment into wildlife areas.

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UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

SAFARI CLUB INTERNATIONAL	)	
	)	
Plaintiff,	)	Civ. No. 14-cv-00670(ABJ)
	)	
v.	)	
	)	
SALLY M. R. JEWELL, et al.	)	
	)	
Defendants	)	
	)	

DECLARATION OF ALISTAIR POLE

I, Alistair Pole, being first duly sworn on oath, depose and state as follows:

1. I am the owner of Zambezi Hunters in Ballantyne Park, Harare, Zimbabwe.

2. Through Zambezi Hunters I have been a member of Safari Club International since 2003.

3. I have also been a member of Dallas Safari Club since 2003 and the Safari Operators Association of Zimbabwe since 2001.

4. I am currently a committee member for the Safari Operators Association of Zimbabwe, Save Valley Conservancy, and Zimbabwe Wildlife Association. From 2010 to 2012, I was vice president of the Zimbabwe Council for Tourism.

5. I have been an outfitter for 13 years. I have provided elephant hunts since 2004. This year, we have nine elephant hunts in our quota.

6. We have seven elephants on quota in the Mahenye CAMPFIRE area adjacent to the Gonarezhou National Park. An aerial survey of the area conducted last year estimated the elephant population at over 10,000. The population has doubled in the last 10 years.

7. We usually hunt another two elephants in the Save Valley Conservancy. Last year's aerial survey estimated the population at 1,500 elephants in the area. This is an increase from the 553 elephants that were introduced into the area in 1993.

The Save Valley Conservancy has an elephant management plan (that was funded by the U.S. Fish and Wildlife Service) with a stated density objective being 0.3 elephants per square kilometer. The current population is well above this target. The management plan advises management through culling or live off take.

8. In the Mahenye CAMPFIRE area the elephants are a problem because they destroy crops and endanger the safety of those that live in the area. The fact that the locals get some benefits from elephant hunting helps alleviate the problem and ensures that the human-elephant conflicts don't become so many that the people try to destroy the elephants in the area. My company spends a lot of time, effort and resources chasing elephants out of the fields from February to May when crops are growing in the fields.

9. I have not personally witnessed elephant poaching in the areas in which I provide hunts. Sport hunting helps protect crops and provides a financial benefit to the community. This helps to deter the people in the Mahenye area from poaching the elephants. If there was no sport hunting, I have little doubt that the community would see no point in maintaining an elephant population in their area.

10. Safari areas form buffers around many of the National Parks in Zimbabwe and harbor a large portion of the national elephant population. The protection and maintenance of the elephant herds in the National Parks is dependent upon the survival of elephants in these more marginal safari areas. In other words, the safari areas are the first line of defense. The management of these areas is almost solely funded by safari operators through the income that they receive via sport hunting. Funds received from sport hunting covers anti-poaching efforts, road maintenance, water supply, fire protection, etc. The elephants in these areas would be exposed to poaching without sport hunting. In turn, the elephants in National Parks would also be threatened.

11. My company will potentially lose the income from nine elephant safaris this year due to the trophy importation ban. The potential income from those hunts is $337,000.00.

12. In the Save Valley Conservancy a wide range of species are hunted, so the loss of elephant hunting will not be catastrophic, but the Conservancy is already stressed financially. On the other hand, the Mahenye area relies on elephant hunting for 100% of its income. A loss of elephant hunts will result in us not being able to meet our obligations to the community in making payments, providing animal control and assisting with community projects.

13. We will attempt to sell our elephant hunts to non-U.S. hunters if necessary. However, we sell 90% of our hunts to U.S. hunters. It will not be easy to replace

them. I imagine that we will have to offer severely discounted hunts to get any interest because the market will be flooded with offers from other operators.

14. I believe the decision to ban the importation of elephant trophies from Zimbabwe and Tanzania is short sighted and will have a negative impact on elephant conservation to the extent that the bans will fuel and facilitate an increase in poaching.

15. I submit this declaration in support of Safari Club International's efforts to challenge the U.S. Fish and Wildlife Service's decision to prohibit the importation of sport-hunted elephant trophies from Zimbabwe and Tanzania in 2014.

In accordance with 28 U.S.C. §1746, I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Dated this 25 day of April, 2014, at HARARE, ZIMBABWE.

Alistair Pole

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Elephant Hunting and Conservation

A study of African elephants by Karen McComb and colleagues revealed that matriarchs are repositories of social knowledge for family groups (Reports, "Matriarchs as repositories of social knowledge in African elephants," 20 Apr., p. 491). Therefore, the authors suggest that the removal of older elephants by hunters could have serious consequences for the conservation of the species. McComb *et al.* did not elaborate on conservation issues, so we wish to discuss two key considerations that are important to take into account in elephant conservation efforts: namely, the different consequences of legal versus illegal hunting, and the importance of habitat loss in reducing elephant numbers.

Evidence on illegal hunting indicates that poachers target individuals with the largest tusks, including many matriarchs (1). In contrast, trophy hunting, besides being regulated and limited by quota to relatively few animals per year, primarily targets large bulls (2, 3). Bulls are far more solitary than females (4), so their role as repositories of social knowledge, although untested, is likely to be less important than that of matriarchs. Although the removal of significant numbers of older bulls from a population may have other detrimental results (1), the effect of regulated, low off-take trophy hunting on group social knowledge is likely to be minimal when compared with poaching.

More importantly, a well-regulated trophy hunting system can help maintain elephant numbers while raising revenues to fund elephant conservation programs and benefit local communities, who share 80% of the species' range. Given that habitat loss contributes significantly to elephant decline (5), it is essential to encourage coexistence between elephants and local communities outside protected areas. Without intervention, however, elephants are generally unpopular because they may damage crops or threaten the lives of people (3). Furthermore, compensation schemes for those adversely affected have largely failed (6), and tourism benefit-sharing schemes are limited to more accessible areas with relatively developed infrastructure and do not provide a focussed benefit from elephants. Consequently, many communities and wildlife authorities have resorted to the destruction of problem animals. Indeed, in Kenya, where there is no trophy hunting, figures from 1992 to 1999 show that similar numbers of elephants were killed by poachers as were shot by Problem Animal Control units (412 compared with 428, respectively) (7).

In other countries, however, trophy hunting provides a means of turning a problem into assets worth more than $10,000 per elephant trophy to the community, resulting in greater tolerance of elephants and fewer animals killed overall (4). In Zimbabwe, implementing trophy hunting has doubled the area of the country under wildlife management relative to the 13% in state protected areas (3). As a result, the area of suitable land available to elephants and other wildlife has increased, reversing the problem of habitat loss and helping to maintain a sustained population increase in Zimbabwe's already large elephant population (8).

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Response

In our study, we used playback experiments on female African elephants to demonstrate that the possession of enhanced abilities for social discrimination by the oldest female in a group can influence the social knowledge of the group as a whole (1). These superior abilities for social discrimination may result in higher per capita reproductive success for female groups led by older individuals, and thus removal of matriarchs from elephant family units could have serious consequences for the conservation of this endangered species. While our experiments provide evidence that older group members act as repositories of social knowledge, other forms of accumulated knowledge held by such individuals, including knowledge of the location of food resources, may also have important effects on reproductive success.

Older female elephants clearly face their major threat from illegal hunters, who kill them for their tusks and for food. Leader-Williams and co-authors argue the case for legal hunting of male elephants maintaining elephant numbers. Although serious concerns are raised elsewhere over the implications of losing older males from endangered elephant populations because of their particular importance in breeding (2), male elephants were not the subjects of our paper. However, we emphasize in general terms the danger of removing older, more experienced individuals from social groups in endangered populations of advanced social mammals, because the situation for female elephants has obvious parallels elsewhere (1, 3). In many whale species, for example, large-brained, long-lived females also form closely bonded social groups (3, 4), and examination of the size of individuals in commercial catches suggests that the largest may have been selectively taken (5). Given that our results indicate that groups may rely on older members for their store of social knowledge, in the absence of information on specific cases we would urge caution over any activity that results in their removal from endangered populations.

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What we do

We support rural communities and help them to participate in the economy through wise and sustainable use of their natural resources. We show rural communities that agriculture, cattle ranching and wildlife ranching are all profitable activities vying for the use of land and provide them with the means to profit from maintaining healthy wildlife populations, thus truly achieving the goal of sustainable development through conservation.

The CAMPFIRE Association works with local communities to help them to manage their land and their wildlife for future generations and to help them realise financial benefits from effective resource stewardship. We provide the following services to local communities:

Institutional development: We organise individual households (producer communities) in CAMPFIRE districts into various committees to manage their natural resources. Producer communities receive help with project proposal development, forming organizations and project management, and help them to ensure that the revenues generated are managed in a democratic, transparent and accountable manner.

Law enforcement: We train and financially support "Resource Monitors" or "Game Scouts", who monitor and apprehend those persons breaking the national, district or locally developed rules designed to protect natural resources.

Contracting and monitoring of commercial activities: We work with private tourism and safari operators in liason with Local Authorities to broker contracts and ensure that producer communities are fairly compensated for access to their wildlife resources.

Managing human-wildlife conflict: This is a major issue in CAMPFIRE areas and a variety of wild mammals and reptiles pose major threats to people's lives and crops. The CAMPFIRE Association provides technical support and funding for local projects that will reduce human-wildlife conflict.

Fire management: Uncontrolled veld fires cause substantial damage to indigenous forests and wildlife areas, grazing areas, people and property, and the environment. The reduction of incidences of uncontrolled veld fires and associated environmental damage is achieved through implementation of effective fire protection strategies, including training, and in some cases the purchase and maintenance of equipment.

Counting wildlife and quota setting: Knowledge of the number of animals in a given area and where they are found using ground-based methods of counting allows producer communities to effectively increase the productivity of wildlife based enterprises and contribute to improvement of wildlife habitats. Effective wildlife management by communities comes with skills in monitoring changes in wildlife populations, and the ability to contribute such information to the quota setting process.

Campfire Association

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Human Wildlife Conflict

CAMPFIRE Philosophy and Human-Wildlife Conflict

Due to poor rainfall, the absence of rural infrastructure, most notably roads and, in some cases, the presence of tsetse fly, human settlement and cultivation has been minimal in most of the areas where CAMPFIRE was first implemented. Typically, the wildlife producing areas are located towards the margins of the country and nearly all are adjacent to state protected wildlife areas. In these areas, the local communities have voluntarily set aside large tracts of wild land and adopted wildlife production systems, both consumptive and non-consumptive, based on free ranging game whose populations varies considerably between districts and within districts. CAMPFIRE has facilitated the development of appropriate institutions in communal lands so that individual households who share the costs of wildlife management become the main beneficiaries of revenue earned from wildlife and part of the decision-making process. As a result, communities in these harsh climatic and fragile environments, such as the Zambezi Valley have often diverted funds meant for other community priority projects to the procurement of relief food supplies, as a way of augmenting government and other food aid programmes every year.

However, while there are tangible economic benefits from conservation of natural resources, the social costs of living with wildlife in particularly, are high. They include, crop damage, threat to human lives in the form of injury and death, loss of livestock through injury and predation, and opportunity the cost of the land set aside for wildlife that could otherwise be used for cropping, among other land uses. Six cases of human deaths (Elelephant-4, Hippo-1, and Buffalo-1) were recorded in 2005 in Binga, 4 Elephant deaths were also recorded in Guruve, while there were two elephant deaths in Hurungwe, and another in Tsholotsho during the same period. 13 crocodile deaths were also recorded across the same districts during this period. No losses of human life directly attributable to wildlife have been recorded in 2006. However, elephants and lions continue to harass communities especially in Hwange where significant increases in populations of the elephant can ba found.

Human Deaths Reported in CAMPFIRE Districts in 2005

BINGA Elephant 4, Hippo 1, Buffalo 1, Crocodile 3

GURUVE Elephant 4, Crocodile 4

HURUNGWE Elephant 2, Crocodile 3

TSHOLOTSHO Elephant 1, Crocodile 1

CHIREDZI Elephant 1, Crocodile 2

In general, elephants are responsible for up to 75% of all wildlife crop damage in communal areas, with between 30 and 45 cases reported per ward every season. Crop damage is high during the wet season when the most commonly grown subsistence crops, maize and sorghum, are mature. Most rural communities are located close to rivers, and this naturally creates competition for water between the community and wildlife. The use of traditional methods of problem animal control in cropping areas such as making noise and throwing of stones, create habituation and often provoke the crop-raiding animals into challenging people guarding their crops. There is no insurance or any other form of compensation to affected communities for loss of property, crops, and even death, except for standard funeral assistance provided by the community, RDC and local Safari Operators. In the early days, the RDC paid compensation, but without a proper assessment system of the claims. The communities now set aside funds to cater for such eventualities as part of their annual CAMPFIRE revenues.

Solar powered electric fences were constructed out of donor funding and local community contribution to protect crops and homes in the 1990s, in various CAMPFIRE districts. In most districts these fences are now disused due to a shorter life-span. In Binga only the Sinamwenda village still have their circular electric fence intact out of seven similar fences in other villages in the Binga Rural District Council. A new Buffalo fence has been rehabilitated by the Masoka community in Mbire (formerly Guruve) district using their own CAMPFIRE income. Communities also employ Game Scouts, paid from their wildlife accounts, to complement the RDCs' Problem Animal Control Units. The game scouts monitor and apprehend those persons breaking the national, district or locally developed rules for using resources. As part of its support services, CAMPFIRE Association, with the assistance of the Zimbabwe Parks and Wildlife Management Authority, in August 2006 facilitated a two week resource monitor training programme at Mushandike Natural Resources College in response to the high turnover of Resource Monitors due to various factors, and as a way of enhancing the capacity of local communities to manage wildlife. The training was funded by the CAMPFIRE programme resources as a special service by the Parks and Wildlife Management Authority. Donor funded training was last carried out in the 1990s. Although the programme has managed to undertake this training in the absence of donor funding, other challenges remain such as provision of the necessary resources required to apply the training in the field, such as field vehicles, firearms, and ammunition and communication radios.

CAMPFIRE is therefore, in principle, an alternative strategy to reduce conflict between people and wildlife, as much as it is, a conservation strategy. It creates opportunities for sustainable economic development in Zimbabwe's rural areas through natural resources management. However, ecological concerns and other considerations by CITES (2002 rejection of Zimbabwe ivory sale proposal), as well as occasional local misunderstandings in the allocation of off-take quotas are often viewed as impediments to access of indigenous resources by rural communities and their ability to improve local social services, infrastructure, and disposable income.

CAMPFIRE, as a rural development and conservation programme, has also used its success in wildlife management to harness other natural resource based enterprises to improve the livelihoods of people in rural areas.

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Hunting

Hunting is Low-Impact Tourism

For thousands of years, rural Africans have relied on plentiful supplies of impala and other game animals for meat, clothing and income. Ironically, rural Zimbabweans have recently begun laying down their spears and bows, whilst at the same time encouraging foreign hunters to hunt elephants, buffaloes, lions or other wild animals on their lands. The reason is a simple matter of economics - foreign sport hunters will pay large sums to hunt Africa's trophy animals, far more than other tourists will pay to view them. A single hunter can spend more than US $40,000 on a trophy hunting trip. Under the CAMPFIRE programme, at least half of that revenue goes to the local communities for rural development and environmental conservation.

At the moment, CAMPFIRE depends on hunting revenues which contribute over 90% of total income to the districts and communities participating in the programme. In 1993, twelve districts participating in CAMPFIRE, with a human population of nearly 400,000 people, earned US $1,516,693 from trophy fees. This is a small sum per individual on average, but some resource rich areas earn disproportionate amounts and even small sums of cash can create meaningful infrastructure when well invested.

Many communal lands in Zimbabwe lack tourist infrastructure and are unsuitable for photographic tourism. A combination of low game population density and thick bush often means that it is hard to get good sightings of wildlife. However, wealthy people (predominantly from the USA, Germany and Spain) are keen to hunt there to help communities.

Trophy hunters have a much lower impact on the environment than other tourists. They consume a much smaller proportion of resources (such as water), are happy with the most basic infrastructure, and tend to travel in small numbers. All foreign sportsmen have to be accompanied by a licensed professional hunter, who acts as a guide and is trained in wildlife management and skilled at tracking and hunting with minimum disturbance to the wildlife and its habitat. A national parks game scout accompanies hunters to ensure that quotas are observed, and hunting is banned between dusk and dawn.

Every year local communities - with the technical assistance of the Department of National Parks, the WWF and other organisations - conduct a census of wildlife and determine a sustainable quota of animals that can be hunted on their lands that season. The quotas also allow for Problem Animal Control - the culling of individual animals which are persistent pests to people, their livestock or crops. Quotas ensure that wildlife populations are maintained at a level suitable for the local environment. (For more details on setting these quotas, see the appropriate fact sheet in this series).

'Our people have stopped poaching. They understand that a buffalo is worth much more if it is killed by a foreign hunter.'

Champion Machaya, Dete wildlife committee

Hunting & Conservation

Changing Attitudes & Contributing to Wildlife Conservation

For most rural Africans wildlife is a nuisance, posing a serious threat to their livelihoods and sometimes their lives. Lions and leopards prey on their livestock, and elephants and buffalo trample their crops, often destroying the people's only source of subsistence and income in the process. Until now, the only solution has been to illegally 'poach' animals for their meat, or to call for the Department of National Parks to cull individual problem animals. However, given a steady income from trophy hunting, rural people are now motivated to conserve and manage their wildlife, and have the funds to protect their villages and crops.

Through CAMPFIRE, hunting contributes to environmental conservation in Zimbabwe's communal areas. For example:

Young people from each CAMPFIRE area are trained to be game scouts to prevent poaching and assist in local wildlife management.

Revenues from hunting are used by CAMPFIRE communities to undertake animal censuses, provide environmental education and prevent poaching.

Hwange Rural District Council has imported wildlife onto communal lands, where the wildlife population had been decimated.

During drought years, Beitbridge residents have drilled wells to provide water for elephants, and supplied emergency food for wildlife.

Land is being zoned and set aside for wildlife. For example, the Mahenye community abandoned its villages on Ngwachumeni Island to turn it into a wildlife management area. They have stopped cutting down trees so as to improve wildlife habitat and have also banned grazing of cattle outside their community boundaries, with the objective of increasing the amount of habitat available for wildlife.

'Most of our hunters are keen conservationists, so their aim is not to shoot as many as possible, but to bag a prime specimen. They come to us because they know we can provide the goods, but also because their money is going into supporting conservation.'

Bill Bedford, Ingwe Safaris

Setting Quotas

Setting Sustainable Quotas

Once populations have been estimated, sustainable harvesting quotas can be set. Quotas are determined for local conditions, bearing in mind the carrying capacity of the local environment, and making allowances for the different uses of wildlife. At present quotas are issued by the Department of National Parks, although local communities are being trained and empowered to develop the capacity and experience to set their own quotas in the future.

In order for hunting to be sustainable, the quota for each species must be based on offtake rates that take into account the population dynamics and use of the species in question. For example, a hunting quota of ten mature buffalo bulls is based on the assumption that every year ten young bulls will become mature enough to be categorised as trophy males.

Counting Wildlife

Counting Wildlife on Communal Lands

There are several ways of estimating wildlife populations on communal lands in Zimbabwe. Results from all of them are considered when making the final population estimates for each area.

Aerial surveys - The World Wide Fund for Nature (WWF) has been undertaking regular aerial surveys in biologically-rich communal lands since CAMPFIRE started in 1989. These surveys concentrate on elephants, which are more visible from the air than smaller species. Elephants are a useful indicator species, as they have a relatively low reproduction rate. They also bring in more CAMPFIRE revenues than any other species at present (through trophy hunting), so monitoring them is vital.

Apart from the inevitable inaccuracies that plague any form of estimation, the main disadvantages of aerial surveys are that they are technically and logistically complex and extremely expensive. WWF estimates that the bill for a survey conducted in five CAMPFIRE areas during 1994 was US $17,000, excluding labour charges and the costs of getting to survey sites. WWF conducts these surveys every two years for areas where elephant populations are relatively high (in Nyaminyami, Binga, Guruve, and Hurungwe) and once every five years for other districts, namely Beitbridge and Chiredzi.

Information from hunters and safari operators - Professional hunters and safari operators spend a lot of time in the field observing wildlife, even getting to know particular herds and individuals. Their experience and information is invaluable for estimating wildlife populations, and especially important for species that occur in moderate numbers, such as wildebeest, sable, waterbuck, lion, and leopard, for which aerial surveys are of limited use.

Community-based wildlife counts - Under CAMPFIRE rural communities are encouraged to undertake their own wildlife population censuses. Two low-cost methods are being established by the CAMPFIRE Collaborative Group:

Village mapping - Each village development committee produces a sketchmap of its area, marking landmarks such as rivers, hills, and roads. Every month, villagers mark wildlife sightings on a map, making sure they record:

How many animals were seen;

Any features that identify that particular animal or herd (to assist in avoiding counting animals more than once); and the sexes of individual animals (as accurately as possible).

Village development committees from neighbouring villages check that the same animal groups are not counted twice. Then the numbers of each species are added up to give an indication of how many animals are normally resident in the village environs.

Pooling information from different experts - Annual workshops are held in communities each year for experts from within and outside the area to share information on wildlife sightings and surveys and derive an estimated wildlife population for each CAMPFIRE district. Information ranges from simple sightings to formal game counts and surveys. The invited experts include representatives from:

The Department of National Parks; WWF; Rural District Councils; village wildlife committees; village wildlife monitors; safari operators; and other local residents.

Offtake Monitoring

Monitoring Wildlife Offtake

Trophy Records - By law, records of trophy quality must be kept by safari operators. In addition to numbers these records provide additional data on the lengths of horns for trophy ungulates, body length for carnivore species, and tusk weight for elephants.

If too many animals are hunted as trophies, it selectively removes larger animals from the population, forcing hunters to harvest younger animals, with smaller horns, tusks or body lengths. Trophy quality records are therefore a sensitive measure of the hunting pressure on animals in a population and are used to adjust quotas. Quotas are not issued for the next hunting season until hunting records from the last season are turned in for analysis by the Department of National Parks.

Other Offtake Records - Similarly, detailed records are kept of game animals used for cropping, problem animal control, live sales or any other use. These records are maintained by the Department of National Parks.

Game counts, aerial surveys and wildlife sightings also provide direct information on animal populations, essential to monitoring the impact of hunting on animal populations. Sustainable offtake rates for popular species as recommended by the Department of National Parks:

Buffaloes and large antelopes (such as kudu, waterbuck and sable) reach trophy size in 7-8 years; offtake rates are about 2%

Smaller antelopes (impala and duiker) mature quicker: offtake is about 3%

Elephants reach trophy size at about 50 yaars; offtake is 1%

Zebras: are hunted for their skins so any adult will do; their offtake is higher: 6%

Lions and leopards: hunters want a large animal. As these species have litters of several young, the offtake rate is about 5%

Safari Operators

How to Get in Touch with a Zimbabwe Hunting Safari Operator

Zimbabwe has a diverse hunting industry with many different participants. Once quotas have been set, safari operators will usually negotiate a price to hunt a particular animal on community-owned land. They will then market that hunt to their client and act as their guide in the area, organising the logistics of the hunting party.

The Zimbabwe Hunters Association is the main coordinating body for professional guides and hunting operators. They can be contacted at this number +263-4-707306.

The African Hunter Magazine is a Zimbabwe-produced magazine catering to the African safari-hunting community and is a valuable resource to anyone contemplating a hunting safari.

The African Fisherman Magazine is a Zimbabwe-produced magazine catering to the African angling community and is a valuable resource to anyone contemplating a fishing safari.

Campfire Association

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UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

SAFARI CLUB INTERNATIONAL 501 2nd Street NE Washington, DC 20002, Plaintiff, v SALLY M. R. JEWELL, in her official capacity as Secretary of the U.S. Department of the Interior; U.S. DEPARTMENT OF THE INTERIOR, an agency of the United States; DANIEL ASHE, in his official capacity as Director of the U.S. Fish and Wildlife Service; and U.S. FISH AND WILDLIFE SERVICE, an agency of the United States 1849 C Street, NW Washington, DC 20240, Defendants.	Civ. No. 14-cv-00670(ABJ) DECLARATION OF ATLAS LAWRENCE CHEEK, III

I, Atlas Lawrence Cheek, III, being first duly sworn on oath, depose and state as follows:

1. I am from Farmers Branch, Texas.

2. I have been a member of Safari Club International since 1997.

3. I have been a member of the North Texas Chapter of SCI since 1997. I have been on the Board of Directors for the last 14 years, and I have been the 2nd Vice President of the Chapter for the last 8 years.

4. I am also a member of the National Rifle Association of America and Ducks Unlimited.

5. I have been hunting for 61 years. My father introduced me to hunting when I was young. I grew up hunting with all of my friends.

6. In the United States, I have hunted for white-tailed deer, pronghorn elk, moose, black bear, Alaskan brown bear, mountain lion, mule deer, bobcat, foxes, coyotes, rabbits, squirrels, woodcock, quail, cranes, marsh hens, pheasant, chukar partridge, Hungarian partridge, grouse, doves, turkey and geese. I have hunted in Mexico for ducks and geese; in Canada for caribou; in South America for doves, ducks, geese and red stag; and in Spain for red stag and fallow deer.

7. I have been on ten safaris in Zimbabwe from 1997 to 2013. During those safaris, I hunted for leopard, lion, Cape buffalo, elephant, hippo, crocodile, hyena, eland, greater kudu, waterbuck, southern bushbuck, Limpopo bushbuck, impala klipspringer, duiker, grysbok, nyala, sable, warthog, zebra, genet, bush pig and wildebeest.

8. In 2013, I hunted in Tanzania for Thomson's gazelle, Grant's gazelle, gerenuk, lesser kudu, wildebeest and zebra.

9. In 2003, I hunted for a bull elephant in Zimbabwe. In 2008, I hunted for a tuskless cow elephant in Zimbabwe. I recently paid a deposit to hunt a tuskless cow elephant in Zimbabwe in July 2014.

10. I saw many elephants in Zimbabwe during both of my previous elephant hunts. The damage to the habitat by elephants was alarming. I saw stripped mopane trees, denuded forests, and large eroded areas caused by a loss of vegetation.

11. I also saw signs of poaching. The cow elephants of the Zambezi Valley were extremely aggressive and would charge unprovoked when least expected. Vehicles and anything on two legs were fair game. I believe poaching and harassment to be the cause of this behavior.

12. I believe that hunting elephants benefits the species and the local people that live in areas with elephants. My 2003 Zimbabwe hunt took place in Dande North, close to the Mozambique border, in a "Communal Area Management Programme for Indigenous Resources" (CAMPFIRE). The CAMPFIRE program allows the residents of communal lands to share in the benefits generated by the wildlife in the area. During my hunt, after being told of damage done to a maize field by a herd of elephants, villagers took me to the field, where we picked up the track of the herd. After tracking for some time, I successfully hunted a bull elephant. We then went to the nearest village and told the locals that we successfully took an elephant. Men were sent to take the meat from the elephant, which then went to the villagers. I kept the hide and tusks. It was a win-win for all. The village was benefited by the fresh meat and sorely needed source of protein; an elephant that caused damage to the agricultural field was removed from the population; and I was able to participate in a successful and sustainable hunt of an African elephant.

13. My hunt planned for 2014 is scheduled for late July in the Zambezi Valley in Zimbabwe. I have paid a deposit of $4,000 and expect the total cost for the hunt to range between $25,000.00 and $30,000.00. I am prepared to go forward with the hunt despite my concern that I will be unable to import the trophy, but I am hopeful that the U.S. Fish and Wildlife Service will rescind the bans before it is time for me to import my trophy (if I am successful).

14. I take great pride in knowing that hunting elephants will help with the species' survival. Regulated sport-hunting of elephants amounts to a small number of elephants taken compared to the overall populations in each country. Poaching takes a far greater toll on the elephant populations. Reducing elephant hunting only reduces the anti-poaching efforts that are undertaken by safari operators, staff and hunting clients out in the field. With the reduction in revenue from U.S. hunters, CAMPFIRE and similar programs will fail and the local people will take matters into their own hands. Elephant poaching will increase and the number of elephants will decline. I believe that without proper game management via hunting, the African elephant will be doomed.

15. I have heard that most safari operators are not offering refunds to U.S. hunters that have already paid deposits for elephant hunts in 2014. I do not think it would be financially viable for them to offer refunds. They depend on U.S. hunters coming to hunt elephants. Unfortunately, I think that most U.S. hunters will not go to Zimbabwe or Tanzania to hunt elephants if they are not allowed to import the trophy.

16. I submit this declaration in support of Safari Club International's efforts to challenge the U.S. Fish and Wildlife Service's decision to prohibit the importation of sport-hunted elephant trophies from Zimbabwe and Tanzania in 2014.

In accordance with 28 U.S.C. §1746, I declare under penalty of perjury that the foregoing is true and correct.

Dated this 22 day of April, 2014, at Farmers Branch, Tx

Atlas Lawrence Cheek, III

Atlas Lawrence Cheek, III

A Review of Problem Elephant Policies and Management Options in Southern Africa

R. D. Taylor

Executive Summary

This review of problem elephant policies and management options in southern Africa focuses on elephants outside of formally protected areas where they come into contact with rural people, largely subsistence agriculturalists. Over half the southern African elephant range lies outside protected areas and supports about one third of the region's elephants. Conflict is evident wherever there is an human-elephant interface. The review identifies interested parties involved in problem elephant issues and examines policy and management options being implemented, nationally and locally to mitigate human-elephant conflict. The study relied primarily on the use of a questionnaire as a survey instrument. This was provided to over 40 respondents in 7 southern African countries where human-elephant conflict is known to occur. Respondents included all individual country government wildlife management authorities, NGOs, aid agencies and regional organisations involved in conservation and/or rural development, districts councils or equivalent structures and individuals. There was a 44% response to the questionnaire from respondents in six out of the seven countries approached.

Wildlife management authorities and conservation and/or rural development agencies and NGOs, especially those associated with Community Based Natural Resource Management (CBNRM) programmes, are those most interested and involved in problem elephant issues. Government wildlife authorities provide the policy and legal framework for elephant conservation and management as well as undertaking field action. The involvement of NGOs and related agencies includes the provision of technical advice and assistance on management and monitoring of elephants in CBNRM programme areas, undertaking related research with which to inform policy formulation and management decisions and providing capacity and support for mitigating human-elephant conflict.

All six southern African countries have wildlife policies and supporting primary legislation (Acts and Regulations) which protect elephants fully. Zimbabwe, however, is the only country which has delegated authority and responsibility for wildlife management, including elephants, to the legally authorised land occupant. Although no country has a clearly defined policy for problem elephant, elephants can be destroyed in defence of human life and/or the loss of property outside of formally protected areas. Policies generally remain poorly developed, centralised and largely ineffective with procedures for dealing with problem elephants protracted, cumbersome and largely unworkable in practice.

There is a growing recognition of these shortcomings, however, and management authorities are seeking ways in which to be more proactive in dealing with problem elephant issues. Policies are likely to become more favourably disposed towards greater devolution of authority and responsibility in problem elephant management. This evolution is strongly linked to the growing strength of CBNRM programmes. Although there are no strong links yet between these programmes and a reduction in human-elephant conflict, they must be viewed as a powerful mechanism for addressing conflict and providing solutions.

The nature of the conflict centres mostly around the loss of food crops and grains where its perceived severity is consistently high in all countries reviewed. There are no clearly articulated objectives for

managing problem elephants other than the general desire to reduce or minimise the levels of conflict that occur. Of ten different options available for problem elephant management, all six countries have implemented with varying degrees of success, at least half or more of these options. In all countries traditional methods are applied by local communities and this is likely to continue into the foreseeable future. All wildlife management authorities in the region continue to rely on disturbance shooting followed by the destruction of elephant in extreme cases of conflict, in particular loss of human life. Overall electric fencing was considered the most successful management option, with shooting and the use of traditional methods to scare elephants away the next best options.

Those countries that have CBNRM programmes have explored problem animal management options most widely. Namibia and Zimababwe are actively implementing some form of wildlife land use planning and zonation in a number of areas, with growing interest in Botswana, Mocambique and Zambia along the same lines. The long term importance of such planning is recognised by most countries, especially where there are still options to do so. The safari hunting of problem elephants occurs in Namibia and Zimbabwe and both Mocambique and Zambia wish to pursue this option in the future. Sport hunting accords problem elephants a very high commercial value which, provided it is returned to affected communities, offers a very strong local incentive for investment in conservation.

Clearly, no one management option will successfully deal with all problem elephants and conflict situations. Conflict can only be reduced or minimised but probably never eliminated if elephants and humans are to co-exist. Problem elephant management strategies need to incorporate, from the range of possible options available, those best suited to the prevailing site specific conditions. To date, most problem elephant management has been applied in a very *ad hoc* manner. Only in Zimbabwe has there been a more critical and analytical view taken, based on a level of monitoring and evaluation not apparent elsewhere.

Because there are no clear or specific management policies or plans for problem elephant management, wildlife management authorities either do not budget (finance, manpower, time) or do so very inadequately, for problem elephant issues. Only in Botswana does DWNP maintain a Problem Animal Control Unit. In Zimbabwe RDCs allocate resources to problem animal management because firstly, CAMPFIRE has brought problem elephant issues to the fore, and secondly, RDCs have the legal authority to do so, even though such resource allocation may be highly variable across these districts. Donor agencies, NGOs and their technical specialists have provided direct and indirect support to dealing with problem elephant issues particularly where there are CBNRM programmes and projects in place. Training is provided for game scouts, guards and rangers in wildlife departments by their respective Governments, but usually limited to control shooting. In CBNRM programmes, donor and NGO support for training and capacity building is more embracing, covering a range of resource management issues.

Monitoring of problem elephant is largely limited to local reporting of incidents to the wildlife authorities for an appropriate action to be taken. Although incident records are intended for onward submission to a centralised database, for most countries, this does not appear to be happening in any consistent manner. Botswana maintains a national Problem Animal Reporting (PAR) system which forms the basis for compensation payments to affected farmers. Well researched and designed PAR systems are in place in Namibia and in CAMPFIRE districts in Zimbabwe, but their use is presently limited mostly to soliciting appropriate responses to incidents rather than contributing to systematic longer term monitoring and evaluation upon which to develop and implement management strategies and plans. Consequently, no formally developed or structured decision support systems (DSS) are in place for problem elephant management. The Zimbabwean PAR and Problem Animal Management (PAM) models, however, could serve as a useful starting point for such a DSS.

Specific research projects are outlined in the report. Research should be a part of developing a wider understanding of human-elephant conflict in individual countries and the region. Results should contribute to policy formulation at different levels as well improving the application of problem elephant management options. Two examples are: (i) an independent review of the implementation and efficacy of electric fencing projects in CAMPFIRE districts over the past 10 years and (ii) research work undertaken in the Sebungwe region in north west Zimbabwe on human-elephant interactions, presently being published in peer reviewed journals. Considerable benefit would result from an exchange of information on research initiatives being undertaken in the region and elsewhere. This could be very usefully achieved through the Human Elephant Conflict Task Force of the African Elephant Specialist Group.

The following improvements to understanding and managing problem elephants, common to most or all countries, emerged from the respondents and are incorporated as recommendations at the conclusion of the report:

- actively encourage wildlife as a primary form of land use, together with associated planning to accommodate needs of both people and elephants
- problem elephant policies should be an integrated part of a national elephant conservation and management policy
- provide a suite of problem elephant management options, the choice of one or more options being dependent on site (country, district, sub-district) specific circumstances, all of which contribute to mitigating human-elephant conflict but not necessarily eliminating it
- implement CBNRM programmes which ensure the return of benefits from natural resource management, including problem elephants, to locally affected communities
- devolve greater authority, responsibility and accountability for problem elephant management to those communities which reside with elephants
- provide relevant and appropriate training, education and awareness on problem elephant issues at all levels
- involve all stakeholders in the development of problem elephant management strategies and plans
- improve communication and coordination at all levels
- link and integrate policy, resource (elephant) management and science (research) and apply adaptive management principles
- develop and implement standardised protocol for information and data gathering, collection, storage and analysis
- coordinate funding approaches for technical assistance, support for research and other related problem elephant issues

FINAL REPORT

Mid-Term Evaluation
of the
Zimbabwe Natural Resources Management Project, Phase II
(USAID/Zimbabwe Strategic Objective No. 1)

Contract #AEP-0085-I-00-6021-00

Communal Areas Management Programme
for Indigenous Resources, CAMPFIRE

Submitted to:
USAID/Zimbabwe

Submitted by:
The Mitchell Group, Inc.
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Washington, DC 20001
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July 31, 1998

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EXECUTIVE SUMMARY

This report presents the results of a formal mid-term evaluation of USAID/Zimbabwe's bilateral Natural Resources Management Project (613-0241), Phase II (NRMP II). The project supports the Communal Areas Management Programme for Indigenous Resources, CAMPFIRE, which is a distinctively Zimbabwean initiative designed to achieve community development and conservation objectives by transferring certain ownership rights over common property resources from central state authority to local communities. The Programmeformally began with the Department of National Parks and Wildlife Management's decision to devolve use rights over a mobile resource, wildlife, to Rural Districts. Along with certain management responsibilities, decentralized governance gave local populations access to a ready stream of benefits in the form of the trophy fees associated with an established industry. A few years later, in 1989, USAID began supporting CAMPFIRE through its regional Natural Resources Management Project (NRMP I) (690-0251.13). This geographically focused pilot phase was redesigned in 1994 as the bilateral NRMP II ($16.0 m), which included some continued funding through the USAID regional office ($4.5 m). The bilaterally-managed project, effectively underway since late 1995, is national in scope and adds support for CAMPFIRE's diversification into other indigenous resources. After a recent extension, NRMP II is scheduled to continue through September 30, 2000.

The evaluation scope of work calls for a comprehensive external review of CAMPFIRE and documentation of USAID support to it. The Programme is complex, and its implementation involves a partnership of government agencies and non-governmental organizations who assist rural communities and community based organizations. The evaluation team identified a number of priority issues:

- Adequacy of the current level of devolution of authority over resources to the Rural Districts to achieve the tenure security and participation that CAMPFIRE assumes necessary for success;
- Potential for diversifying into additional resources and income streams and CAMPFIRE's capacity to undertake this initiative;
- Potential for NRMP II to enhance the long-term sustainability of CAMPFIRE;
- Adjustments in project management structures, resources, and timetable needed to achieve maximum results.

In addition, because the natural resource revenues the Programme channels to local populations are largely dependent on consumptive wildlife use, the Programmehas become the target of an aggressive anti-CAMPFIRE animal rights campaign. The evaluation seeks to clarify some of the confusion resulting from this public controversy about CAMPFIRE and the USAID assistance provided through NRMP II.

Findings and Conclusions

With its approximate 10-year history, the lessons from CAMPFIRE are of real value to similar programs in the region and elsewhere. In favorable habitats of Zimbabwe's agriculturally marginal communal lands, the Programme sports a stable track record of producing meaningful benefits for local residents. In locations where wildlife is less abundant, the economic returns have been mixed and show less promise, at least in the short term.

By conferring proprietorship of wildlife resources to the Rural District Councils (RDCs) through the mechanism of "Appropriate Authority," benefits accrue to the populations residing in proximity to favored habitat with its rich endowment of charismatic megafauna. Most revenues still derive from the consumptive, sustainable use of this resource. The maintenance of trophy quality and overall wildlife numbers suggest that wildlife populations are being sustainably exploited under present conditions. Most observers consider the hunting quotas in CAMPFIRE areas to be conservative.

CAMPFIRE's philosophy engenders a positive sense of empowerment, and its approach is well-entrenched among local populations as it is across government departments. Non-wildlife resources, including some mineral resources, are coming under the CAMPFIRE umbrella, and thus, under its designation of the RDC as the responsible administrative unit, where Appropriate Authority resides. That level is generally higher and removed from that of the producer communities. CAMPFIRE functions best where the RDCs have devolved some authority, and the majority of revenues, to the producer level. Where benefits are minimal or have been generalized to a wider population, the essential link to improved conservation breaks down.

Devolution of resource management authority below the level of the Rural District remains problematic. While policy and legislation enable some devolution and transfer of benefits to those groups actually bearing the burden of management responsibility, the RDCs have a mixed record in applying CAMPFIRE's principles. Over time and on

average they have respected the guidelines for revenue distribution. Since the Programme began, RDCs have devolved 58% of revenue to the producer wards, retaining an average of 25% for management fees and 15% as a District levy. Such statistics disguise significant variation across the RDCs, however, in how they apply the guidelines. Communities utilize these revenues in a variety of ways, including for cash distributions and social infrastructure, and, to some extent, for economically viable micro-enterprise investments. Much of this benefit distribution improves the quality of life of women and children in CAMPFIRE districts.

Policy obstacles limit tenure security over resources and inhibit the capacity for devolution below the District level. Policy changes are needed to facilitate the expansion of bottom-up planning capacity for improving natural resource management (NRM). Such empowerment would enable narrow pilot interventions to become more generalized across the CAMPFIRE Collaborative Group's (CCG) capacity-building efforts in the producer community and RDC institutions. The institutionalization of participatory quota-setting offers a model for other resources and practices.

CAMPFIRE's early success was founded upon an already established international wildlife market, and its leaders were successful in helping local Zimbabwe communities link up to this revenue stream -- thereby benefitting not only their own socioeconomic development, but also leading to the sustainable management and successful conservation of this resource, particularly the African elephant. For the past several years, CAMPFIRE has begun diversifying into other conservation-based economic activities. USAID support has largely underwritten the investment in developing institutional capacity to expand the program. Diversification into other natural resource uses, with the possible exception of the ecotourism market, does not enjoy similar ready-made markets. Accordingly, successful models for these alternatives will take longer to develop, a major reason why continued long-term support for this effort is essential. Long-term sustainability of CAMPFIRE and its RDC and local staff depends on the economic growth of viable diversified natural resource enterprises, possibly including development of non-consumptive tourism or the inclusion of fish, forestry products, and minerals.

NRMP II support has facilitated the rapid expansion of CAMPFIRE to the national level, but spreading CAMPFIRE Development Fund (CDF) institutional grants to some 20 Rural Districts dilutes benefits and the efforts of the implementing partners. In some cases, the project appears to be creating unsustainable levels of staffing, especially for the CAMPFIRE Association (CA) and RDCs. Projected infrastructure grants through the CDF have not yet materialized. Absent an expanded revenue base, staff reductions will be necessary when project funds are no longer available.

The Africa Resources Trust's (ART) advocacy and networking activities underscored a rapidly widening and fundamental rift between conservation NGOs and animal rights advocacy groups. ART's own activities in espousing a Southern Africa sustainable use perspective remain a source of ongoing debate and direct confrontation with the animal rights movement. After unsuccessully attempting to engage animal rights groups constructively with an eye toward possible collaboration, the elephant downlisting debate drew ART into a highly visible political struggle for international influence. CAMPFIRE became a lightening rod for groups generally opposed to sustainable use initiatives, especially those involving trophy hunting and elephants. Ultimately, ART spearheaded a government and NGO counter-response, using its own funding but building on the strengths ART had acquired through NRMP II financing.

Two of USAID's critical assumptions about CAMPFIRE may increasingly become untenable, specifically, that: "adequate ownership and use rights continue to exist for individuals and communities to manage resources sustainably and to benefit directly from that management," and "CAMPFIRE communities can manage population growth, particularly due to in-migration from less developed areas." In both cases, it is not clear that either of these conditions has actually ever existed in a general sense, and movement toward them continues, particularly for the second, to be problematic and may threaten program achievements and long-term sustainability. The leadership of CAMPFIRE needs to become more focused and to concentrate on such key high-level challenges rather than day-to-day program implementation.

Recommendations

Use the remaining project funds to continue CAMPFIRE efforts to diversify the sources of revenue from sustainable natural resource use. Transform the CDF into a longer term financing mechanism, such as a sinking fund, that would extend NRMP II funds beyond the potential ending of USAID support in 2000 or 2002. This action would provide new, as well as ongoing, initiatives greater opportunity to prove their technical soundness and become

sustainable.

Simplify NRMP II administration by implementing a series of key project management changes. In the short term, phase out the Project Execution Team (PET) and transform its subcommittees into CAMPFIRE Consultative Group (CCG) subcommittees, in part by refocusing CDF financial management and other NRMP II management responsibilities more tightly within the Institutional Contractor (IC) and USAID SO1 team. For broader project issues, including impending NRMP II and Mission graduation, the core management team would work closely with the NRMP II Bilateral Review Committee. In the longer term, the evaluation team recommends that a CDF/follow-on funding mechanism be used to provide an *enabling context* for the development of commercially viable NRM enterprises identified through the participatory planning process, especially at the village and ward levels.

USAID should encourage CA to redefine its leadership role by focusing on policy dialogue and program advocacy, and on using its functions of program coordination to bring out the relative strengths of its implementing partners. Key policy areas that affect resource tenure security, governance, and access to markets require a concerted policy initiative spearheaded by the CA Board and Secretariat. The CA leadership should build on the PET subcommittee's efforts by working with the Government of Zimbabwe (GOZ), political and private sector partners to improve the CAMPFIRE's policy environment. The CA Board should bring in several outside members on an invited, fixed-term, basis representing, among other possibilities, natural resources institutions (both GOZ and NGO), the tourism and hotel sector, the financial sector, and, possibly, the mining sector. The CA should encourage that CDF funding (along with other funding) be used to reinforce CA/CCG partner collaboration at all levels, but especially at the field level (RDCs, wards, villages and other groups with recognized authority).

Support new CCG partners and redefine interagency relationships and operating procedures. USAID, together with the Bilateral Review Committee, should request that the CCG undergo a strategic reassessment of individual capacities and interrelationships among collaborators, leading to a new Plan of Operations similar to that realized in 1995. The aims would include providing greater synergy across sectoral expertise and more efficient geographic coverage through better use of the field presence of each implementing partner, redefining institutional objectives, reaffirming and accommodating new partners and strategies.

Develop a CAMPFIRE approach to community-based natural resource management (CBNRM). In concert with District Environmental Action Plan (DEAP) and other initiatives, define and generalize a flexible model of participatory land-use planning/CBNRM that infuses an empowering aspect into the existing provision for NRM by-laws. Develop a set of "best practices" guidelines that can be adapted to differing contexts. The CA should sanction this approach, which should include provision for the "graduation" of CAMPFIRE communities and an "exit strategy" for the CCG partners. This would encourage a feeling of common purpose, shared ownership of principles, and a logical avenue toward common CAMPFIRE marketing efforts in areas such as ecotourism.

Improve program monitoring and evaluation, including a major initiative to incorporate habitat monitoring into the overall monitoring and evaluation (M&E) system. Strengthen World Wildlife Fund (WWF) support to CAMPFIRE by funding actions in wildlife habitat monitoring. These should be linked to ongoing efforts among other partners, including the DNPWLM, Forestry Commission, Department of Natural Resources (DNR), and Agritex (which may also warrant some NRMP II funding.)

Regional links to efforts such as tourism initiatives, information, and marketing outreach, and sharing CBNRM lessons should be strengthened. Develop new initiatives to capitalize on the strategic alliance between the CA and ART. USAID/RCSA activities should continue to support CAMPFIRE after bilateral funding has terminated.

USAID/Zimbabwe should continue to support the CAMPFIRE movement, with some modification to NRMP II and additional funding through FY2002. Continue direct contract support of the IC and GOZ partners and continuing grant support at a reduced level to the CA. Maintain initial direct support to NGOs. Subsequently, phase down direct grants to CCG NGO partners, and, instead, encourage them to continue to access support through joint proposals with the CA Secretariat and membership for funding under the CDF or from other sources.

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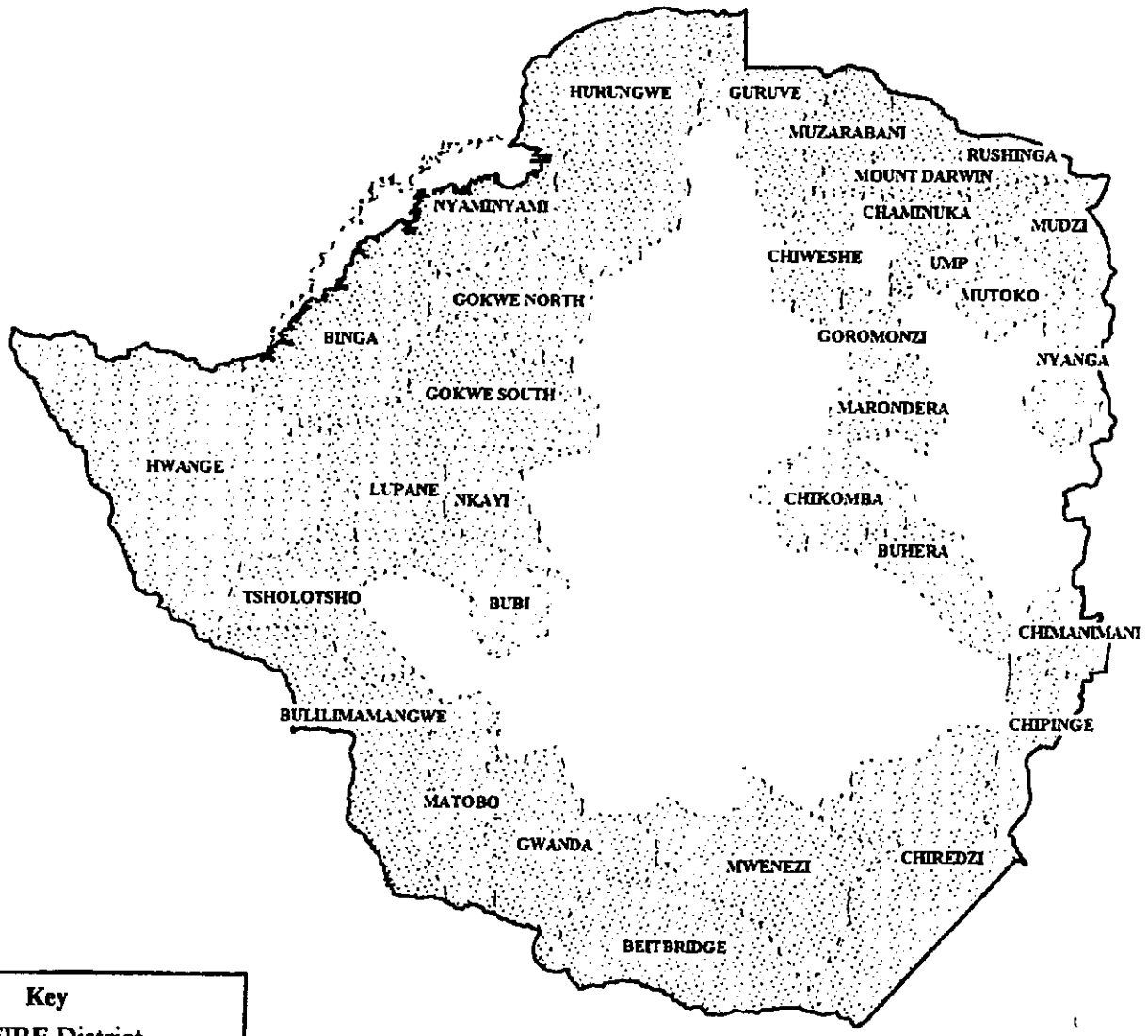
LIST OF ACRONYMS

ART	Africa Resources Trust
ADMADE	Administrative Management Design for Game Management Areas (Zambia)
BSP	Biodiversity Support Program
BRC	Bilateral Review Committee
CA	CAMPFIRE Association
CAMPFIRE	Communal Areas Management Program for Indigenous Resources
CASS	Centre for Applied Social Sciences
CBCD	Conservation-Based Community Development
CBNRM	Community-Based Natural Resource Management
CBO	Community-Based Organization
CCG	CAMPFIRE Collaborative Group
CDF	CAMPFIRE Development Fund
CITES	Convention on the International Trade in Endangered Species (Flora and Fauna)
CSP	Customer Service Plan
CCU	CAMPFIRE Coordinating Unit
CWA	Community Wildlife Areas
CLFP	Communal Lands Forests Produce
CIDA	Canadian International Development Agency
DA	Development Associates
DNPWLM	Department of National Parks and Wildlife Management
DNR	Department of Natural Resources
DEAP	District Environmental Action Plan
DSS	Decision Support System
E/NRM	Environment/Natural Resource Management
ESF	Environmental Screening Form
EIA	Environmental Impact Assessment
FAO	United Nations Food and Agriculture Organization
FC	Forestry Commission
GIS	Geographic Information System
GOZ	Government of Zimbabwe
HSUS	The Humane Society of the United States
HSI	Humane Society International
IDU	Institutional Development Unit
IC	Institutional Contractor
ISA	Initiative for Southern Africa
IUCN	World Conservation Union
IUCN/ROSA	IUCN Regional Office for Southern Africa
M&E	Monitoring and Evaluation
MAPS	Multispecies Animal Population
MLGNH	Ministry of Local Government and National Housing
MMET	Ministry of Mines, Environment and Tourism
MOF	Ministry of Finance
NGO	Non-Governmental Organization
NRM	Natural Resource Management

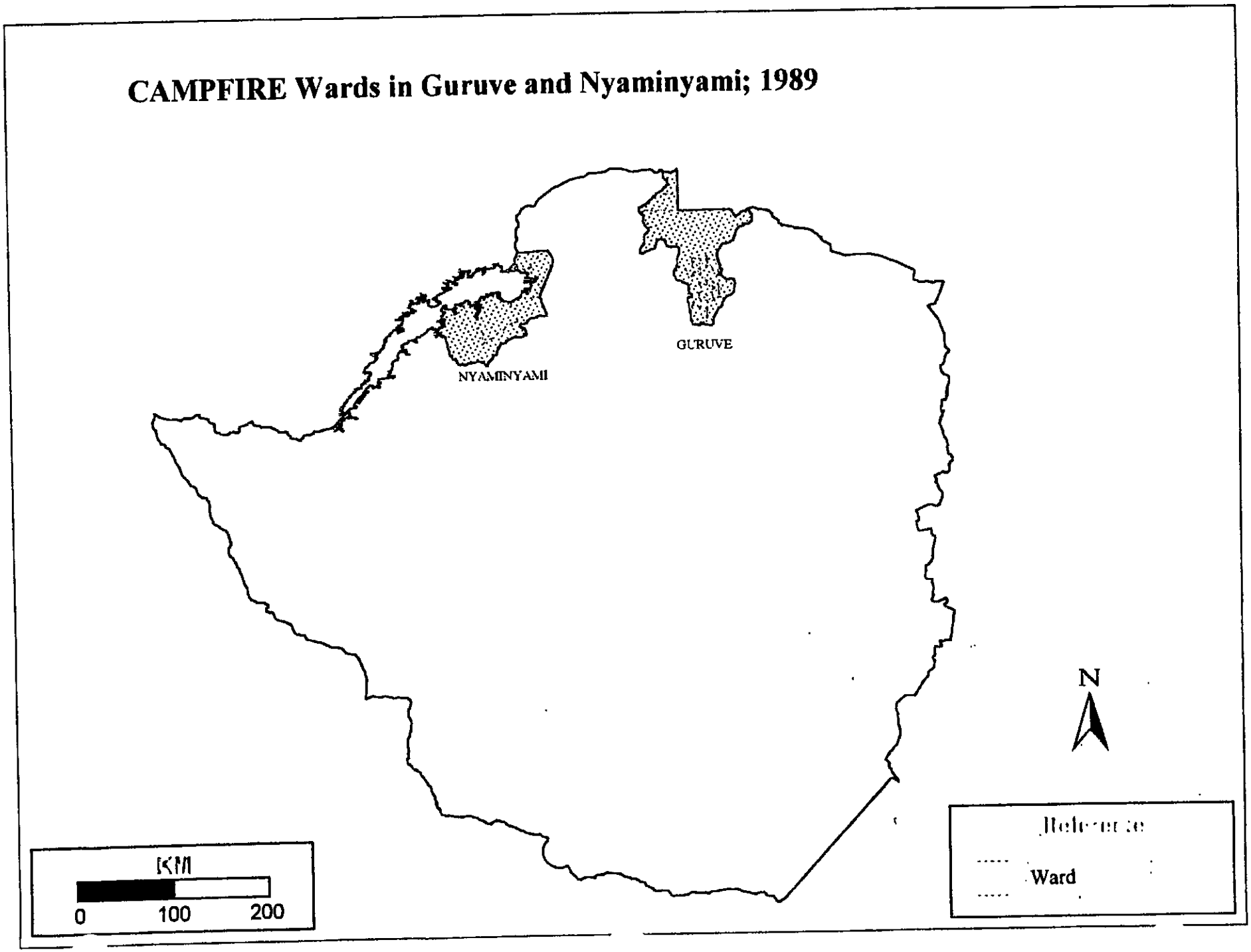
List of Acronyms, Con't

NRMP II	Natural Resource Management Project Phase II
NCS	National Conservation Strategy
NAP	National Action Plan
NORAD	Norwegian Agency for Development
ODI	Overseas Development Institution
ODA	Overseas Development Agency
PSC	Personal Services Contractor
PET	Project Execution Team
PAC	Problem Animal Control
PACD	Project Anticipated Completion Date
POMS	ZimTrust Process Oriented Monitoring System
PVA	Population Viability Analysis
RDC	Rural District Council
RCSA	Regional Center for Southern Africa
RF	Results Framework
RBZ	Reserve Bank of Zimbabwe
RTI	Research Triangle Institute
SADC	Southern Africa Development Community
SAFIRE	Southern Alliance for Indigenous Resources
SARP	Southern Africa Regional Program
SASUG	IUCN Southern Africa Sustainable Use Group
SCI	Safari Club International
SECID	Southeastern Consortium for International Development
SOW	Scope of Work
SO	Strategic Objective
SOER	State of Environmental Resources
SP	Strategic Planning
SUPCAMP	WWF Support to CAMPFIRE Project
STTA	Short-term Technical Assistance
TIFF	The Investment Fund for Foundations
TMG	The Mitchell Group, Inc.
UNDP	United Nations Development Programme
USFWS	US Fish and Wildlife Service
US$	United States Dollar
VIDCO	Village Development Committee
WADCO	Ward Development Committee
WWF	World Wide Fund for Nature/World Wildlife Fund
ZimTrust	The Zimbabwe Trust
Z$	Zimbabwean Dollar
ZTA	Zimbabwe Tourist Authority

Zimbabwe CAMPFIRE Districts,1997



CAMPFIRE Wards in Guruve and Nyaminyami; 1989



I. OVERVIEW

When, upon arriving in Ghana to open his March 1998 tour of Africa, President Bill Clinton observed that "We must learn to live in harmony with other species," he implicitly acknowledged two central truths -- the global recognition of the importance of Africa's unique and vital wildlife resources and the fact that people and wildlife, both flora and fauna, cannot thrive in isolation of one another. Africans had long coexisted fruitfully with wildlife until, first, colonization, and, then, modern development threatened and undermined traditional patterns of successful coexistence. In the mid-1980s officials in Zimbabwe's Department of National Parks and Wildlife Management (DNPWLM) teamed with social scientists from the University of Zimbabwe's Centre for Applied Social Sciences (CASS) to create what came to be called the Communal Areas Management Programme for Indigenous Resources, or CAMPFIRE. In so doing, they acknowledged the inadequacy of the prevalent model of protection, with its singular focus on creating and policing an edifice of parks and other restrictive wildlife reserves. Instead, CAMPFIRE encourages rural communities to rediscover their vital link with nature and to profit from its expression under contemporary sociopolitical and economic conditions.

This evaluation addresses the second phase of USAID support for CAMPFIRE. USAID/Zimbabwe's support through its Natural Resources Management Project, Phase I (NRMP I) was part of a larger regional project supporting several pilot efforts to test community-based natural resource management (CBNRM) approaches; the second phase (NRMP II) builds on this initial experience in four Rural Districts of rural Matabeleland and expands coverage to the national level. The bilateral NRMP II (613-0241) is managed by USAID/Zimbabwe. It began in September 1994, with a USAID contribution of US$20.5 million, of which US$16.0 million involves bilateral program funding. The remaining US$4.5 million is passed through the USAID Regional Center for Southern Africa (RCSA). Zimbabwe governmental and non-governmental organizations (NGO) partners contribute substantially in the form of salaries and organizational offices, investment of CAMPFIRE revenues, and materials. Other donors have contributed more than US$7 million to CAMPFIRE.

This report is organized to address a wide audience. This chapter essentially serves as an expanded executive summary and is intended for many readers as a stand-alone document. The main body of the evaluation goes into considerably greater detail, and the authors assume that many readers will be interested in only certain sections. Chapter II introduces the evaluation and places CAMPFIRE in a broader context. Chapter III covers the majority of current CAMPFIRE and NRMP II evaluation issues. Chapter IV explores some of the development issues raised by CAMPFIRE in greater depth and assesses the Programme response vis-a-vis these issues. Chapter V is principally concerned with USAID management decisions with respect to CAMPFIRE's sustainability and the measurement and monitoring of program performance. Scenarios for future USAID support are contained therein. Chapter VI highlights a few of the many lessons that can be drawn from the CAMPFIRE/NRMP II experience. Finally, a considerable body of supporting material has been incorporated in a series of appendices.

A. What Is CAMPFIRE?

CAMPFIRE is concerned with all indigenous resources, natural and cultural. In the case of the former, it provides an alternative to the loss and degradation of habitats by making wildlife a valuable resource. In proposing to involve local populations as partners in conservation, CAMPFIRE bucked conventional wisdom and became, not a blueprint, but a model for CBNRM in the region as well as elsewhere in the world. The Programme's historical roots, coupled with wildlife's income potential, gave the natural resource subsector a central role over the first decade of the Programme's implementation. More attention is now being paid to expanding the Programme to include other indigenous resources.

It is helpful to understand CAMPFIRE as both a philosophy and a program. As a philosophy it weds the ideals of local empowerment to the rewards of sustainable use of the natural resource base. It is founded on the premise that benefits must exceed the perceived costs of managing the resource and must be secure over time. As a program, CAMPFIRE is indisputably a Zimbabwean creation, implemented by a coalition of local conservation and development partners based both inside and outside of government. An association of its rural constituency, the CAMPFIRE Association of Rural Districts Councils (RDCs), occupies a lead role in this constellation. As the challenges of translating philosophy into practice are confronted, the oft-heard phrase, "CAMPFIRE is a learning process," underscores the principles of adaptive management that underlie its history of implementation. Over time CAMPFIRE is developing into a profound social movement. By empowering communities to take responsibility for the ensemble of their "indigenous resources," CAMPFIRE encourages decentralization, local responsibility, and the evolution of democratic institutions.

CAMPFIRE operates in communal areas of rural Zimbabwe that are mostly semi-arid lowlands with low agricultural potential. With support from USAID and other donors, the Programme has expanded since 1987 from its initial focus of redirecting sport hunting revenues in two Rural Districts. It now includes conservation-based initiatives involving diverse resources and 36 Rural Districts. The coalition of CAMPFIRE implementors, or the CAMPFIRE Collaborative Group (CCG), has added new partners and activities that address the challenging array of institutional, economic, and technical hurdles linked with this expansion in scope and geographic breadth.

B. Evaluation Issues -- The Natural Resources Management Project

The expansion of the Programme, proposed addition of new CCG members as NRMP II implementation partners, and impending Mission closeout require key management decisions about NRMP II. The focus on broader issues such as the role of advocacy and lobbying, the Programme's association with sport hunting as a conservation tool, and its pioneering role in CBNRM suggest the timeliness of extracting key lessons of interest to a wider audience and of relevance to other operating units. Documenting performance will help clarify the US Congressional debate regarding the relative merits and liabilities of continuing US support to CAMPFIRE. The evaluation's specific objectives are to:

(1) Assess NRMP II's responsiveness to the findings and recommendations of the last project evaluation;
(2) Document USAID-funded contributions to CAMPFIRE to date;
(3) Assess the performance of each of the implementing partners in fulfilling their respective roles and responsibilities under NRMP II;
(4) Document results and impacts to date;
(5) Address certain key policy, planning, management, and implementation issues; and
(6) Recommend revised implementation approaches and arrangements for improving NRMP II achievement and impact, and the prospects for the long-term sustainability of CAMPFIRE as NRMP II progresses toward its final stages of implementation and closeout.

The evaluation findings are made against a set of project assumptions included in the original project design. These are listed in Box 1.

C. Institutional Partners

The CCG is a relatively informal grouping of directors of the CAMPFIRE implementing organizations. Considered to be somewhat "dysfunctional" from a management perspective, USAID promoted the creation of a project-specific inter-organizational structure, the **PET**. The PET, which is chaired by the CA, holds quarterly implementation review meetings and annual planning workshops. PET technical subcommittees, e.g., policy, monitoring and evaluation, have become de facto CCG subcommittees. One of PET's significant functions has involved review of proposals submitted to NRMP II's CDF. The CDF has a budget line of US$6 million, of which US$1.6 million had been obligated at the time of the evaluation. Over 20 CDF grants for equipment, CAMPFIRE staff, training, and operations have been released to the RDCs, funding that has enabled Zimbabwe to gear up for a much-expanded CAMPFIRE effort.

Box 1. Key Project Assumptions

1. That wildlife resources are or will become adequate to sustain commercial exploitation.

2. That wildlife utilization can compete economically and financially with other extensive forms of land use.

3. That communities deriving wealth from wildlife resources will both wish to, and be able to, protect these resources.

4. That communities will be willing to manage these resources, and can become capable of doing so, and will invest in the management of wildlife resources.

5. That the international demand for wildlife products will support widespread development of this form of land use.

6. With control over resources, farmers' behavior will lead to the improved conservation of the resource base.

7. The member organizations involved with CAMPFIRE will continue to work cooperatively towards a common objective.

8. Rural District Councils can be persuaded to pay out profits to ultimate resource managers in villages. Villages and RDCs will use these revenues and grants to promote long term resource sustainability.

9. Economically viable technologies and intervention strategies can be developed and adopted for the full range of ecosystems included in the program. (SARP 1994:9)

The CA has been a principal beneficiary of NRMP II assistance. The CA was born of recognition by CCG members that a non-governmental representative organization was needed to promote the interests of the ensemble of CAMPFIRE communities and to take leadership in directing services to member communities. The NRMP II contract provides a US$1.7 million grant (US$1.35 million obligated to February 1998) that funds more than 90% of the CA's budget. CA's leadership role has been enhanced through chairing the PET and CDF committees. Among other NRMP II initiatives was construction of the CA Executive Secretariat office building in Harare. The CA receives organization and management training from the project's institutional contractor and was recently certified by USAID to manage its own grant funds.

The project IC is housed in the CA building and assists the CA organizationally to coordinate implementation of CAMPFIRE. This has involved working with the CA project officer and others to improve CDF grant requests. The IC manages CDF funds and also administers some of the institutional grants to CCG partners. The USAID contract with the IC totals US$3.45 million.

The key GOZ partners are the Ministry of Mines, Environment, and Tourism (MMET), especially its **DNPWLM**, and the **Ministry of Local Government and National Housing** (MLGNH). Although the project is structured through a bilateral agreement, the CCG's NGO members felt that limited government involvement in areas such as policy, monitoring, and problem animal control imposed constraints on CAMPFIRE's agenda. The DNPWLM has spent less than $100,000 of the US$1.5 million envisioned for the department in the project agreement. As of February 1998, the MLGNH had yet to spend NRMP II project funds. Recent policy statements and planning documents indicate readiness of the GOZ to assume a more active role in implementing the program. **CASS** is an autonomous applied research institute attached to the national university system. CASS was awarded a grant of US $1.05 million of which $.4 m. had been expended at the time of the evaluation. CASS studies have provided valuable policy reviews and socioeconomic information, but their dissemination has been weak. After a budgetary and staffing crisis in the university, CASS has proposed resuming a more active role in NRMP II.

NRMP II has also supported several NGOs that are part of the CCG. These include the Zimbabwe (now regional) offices of **WWF**, the **Zimbabwe Trust** (ZimTrust), ***ACTION Magazine***, and **ART**. A grant agreement with WWF for US$1.6 million did not begin until late 1996. WWF provides monitoring and research services to the program, and some training. Because of the late start, WWF had expended about $450,000 at the time of this evaluation. WWF has done an excellent job of maintaining aerial surveys of CAMPFIRE areas and of monitoring revenues and economic indicators of performance. ZimTrust has served as the primary capacity-building support organization at the field level for most of CAMPFIRE's history. It continues to manage its own funds under a revised grant agreement dating from the project's first phase. ACTION is, and ART was, a subcontractor under the ZimTrust grant (combined total of almost US$4.6 million) with which they share a Board of Directors. The ZimTrust deserves credit for training and raising the awareness of many CAMPFIRE communities, but has also been criticized for not having a plan to graduate communities from this dependence on outside services. ART played information, outreach, and advocacy roles for CAMPFIRE, especially in the international context, and worked closely with the CA as the latter

began assuming more of these functions. ART's efforts were instrumental in improving market opportunities by building support for the Convention on the International Trade in Endangered Species (Flora and Fauna) (CITES) partial lifting of restrictions on trade in ivory. ART had exhausted its US$1.168 million in funding as of December 1997 and receives no further NRMP II support. ACTION provides public school education and outreach materials in the form of environmental education curricula materials and a periodic publication, *ACTION Magazine*. ACTION aims to make environmental education more relevant and to tie it to local, practical examples. The evaluation team did not have the opportunity to carry out a field assessment of this component of the project, but it appeared to be accomplishing the objectives, despite reported organizational capacity constraints.

The CCG has recently admitted new governmental and non-governmental members: the **Department of Natural Resources** (DNR), **Forestry Commission** (FC), **and Southern Alliance for Indigenous Resources** (SAFIRE). Each of these organizations has submitted requests for funding under NRMP II. Their proposals support the CA's diversification initiative, which is also compatible with NRMP II's objectives. The evaluation team supports expansion of the NRMP recipients to include these new organizations in the project, an expansion that strengthens the case for an overall extension of the project completion date.

D. General Results -- Responsiveness to Previous Evaluation Recommendations

Between the 1994 Mid-term Evaluation of the Zimbabwe component of the Regional NRMP (essentially a Phase I final evaluation) and the period when NRMP II got underway in earnest, CAMPFIRE was somewhat adrift and rife with uncertainty concerning its future growth and funding. The USAID Mission, with the exception of one Personal Services Contractor (PSC), was neither focused on CAMPFIRE nor the natural resources sector in general. The project, although it had shifted to a bilateral portfolio from a management standpoint, was not well-integrated with the Mission's strategy at the time. During this period, USAID resorted to using interim "bridging" grants to maintain some continuity of NRMP activities. Subsequently, the Mission redesigned its SO1 to coincide with CAMPFIRE.

To its credit, the USAID management team convened a series of consultative workshops to analyze environmental and natural resource problem areas. The resulting analysis helped to establish a new strategic focus for the USAID program and define an operating strategy for NRMP II that substantially addressed the concerns raised in the previous mid-term evaluation report (ULG 1994). Indeed, the workshop that set the second phase into full operation responded well to many of the previous evaluation's recommendations. Likewise, Phase II design and implementation have responded to recommendations to scale up to a national-level program, expand the number and competencies of implementing partners, shift management from a regional to bilateral focus, give the project implementing committee (now the PET) real powers in coordinating, approving, and allocating work, and reinforcing the CA as the lead agency.

The evaluation also stressed the need to further devolve CAMPFIRE activities below the Rural District level and to diversify the sources of natural resource revenues, taking these steps within a

demand-driven mode of operation, and to include technically and environmentally viable infrastructure in response to local needs. The project structure acknowledges these concerns, and the implementation record under NRMP II is reviewed throughout this document.

The ULG 1994 evaluation also called upon USAID to accomplish all these changes in a less "heavy-handed" manner. This mandate may have been unrealistic. USAID was, in effect, caught between the central government, who wanted more control, and an expanded group of independent-minded, mostly NGO, collaborators with only a limited history of working together. Through NRMP II, USAID also faced the task of reinforcing a heterogeneous group of actors occupying the middle ground in a model of decentralization -- the RDCs and subdistrict institutions and their representatives for natural resources, the District, Ward, and Village committees concerned with resource management, the CA Board of Management, and the Executive Director of the CA. With the project under heavy outside scrutiny and under threat of shutdown for much of its second phase, it is only now that USAID is in a position to back off and explore new implementation options. This evaluation team's recommendations are tailored to assist the NRMP to wind down gradually and move in concert with other Mission programs toward orderly closeout, while contributing as far as possible to longer term CAMPFIRE sustainability.

CAMPFIRE is currently active in 36 of Zimbabwe's 57 Rural Districts. Its wildlife revenue base remains concentrated in 12-13 high potential districts, but geographic expansion, visible in the accompanying maps, continues. The Programme has expanded out from its origins with the Guruve and Nyaminyami RDCs to include large expanses of the Mid and Lower Zambezi, Southeast Lowveld, Matabeleland, and Eastern Highland regions of the country. Nevertheless, it continues to concentrate on areas where agricultural potential is limited and poverty widespread

Over the two phases of USAID involvement, the number of local communities participating in CAMPFIRE has increased to the present total of more than 185 wards. This translates to more than 200,000 households and several million people. As noted in this document, commercially exploitable wildlife populations are presently limited to about 13 districts.

The CCG is now servicing districts both with and without Appropriate Authority status. As a matter of practice, most RDCs are obtaining Appropriate Authority and are moving into full membership in the CA. The shift to the national level has thus given impetus to CAMPFIRE to diversify to non-consumptive wildlife uses, to examine other resource policies governing land access, forest ownership, and use, and bring NRMP II into an investment strategy of heavy investment in institution-building of representative natural resource committees and district capacity to serve this constituency. With expansion, efforts to diversify beyond the strict wildlife focus into forest and veld products, fisheries, and eco and cultural tourism are gaining momentum.

Growth is not without consequences and risks: spreading CAMPFIRE support under NRMP II, as explained in detail elsewhere in the report, produces high expectations for benefits from wildlife and other resources, dilutes the energies and capacities of the CCG actors, and puts sometimes excessive pressures on the Programme to engage new institutional partners and develop new revenue streams.

Efforts to meet these challenges have tasked the project coordination structures to the limit. The team's recommendations aim to ease these capacity constraints and enable capacity-building to be stretched over a longer timeframe.

E. Major Recommendations

USAID/Zimbabwe should continue to support the CAMPFIRE movement, with some modification to NRMP II and with additional funding through FY2002.

Continue direct contract support to the GOZ and IC partner and continuing grant support at a reduced level to the CA.

Maintain initial direct support to CCG NGOs. Subsequently, phase down direct grants to CCG NGO partners, and, instead, encourage them to continue to access support through joint proposals with the CA Secretariat and membership for funding under the CDF or other sources.

Modify the CDF to enhance CAMPFIRE sustainability and efforts to diversify the sources of revenue from sustainable natural resource use.

Facilitate review and decisions regarding current proposals under active consideration;

Open up access to CDF monies by eliminating the distinction between capacity-building and infrastructure grants;

Revise CDF proposal criteria to encourage (1) actions at the sub-Rural District level and (2) economically viable natural resource enterprises through pre-investment feasibility studies and capital investments in the resource base;

Have USAID and the MLGNH begin to involve neutral peer reviewers in decision-making about the allocation of CDF monies;

Develop a decision strategy for extending the CDF beyond the current project completion date.

Transform the CDF into a longer term financing mechanism, such as a sinking fund, that would extend NRMP II funds beyond the potential ending of USAID support in FY2000 or 2002. This would provide new, as well as ongoing, initiatives the necessary time to become technically sound and sustainable.

Use the CDF/follow-on trust or endowment funding mechanism to facilitate and provide an enabling context especially at the village and ward levels for the development of commercially viable NRM enterprises, identified through the participatory planning process.

Simplify NRMP II administration by phasing out PET and implementing a series of key project management changes.

In the short term, eliminate PET and incorporate its subcommittees into the CCG.

Refocus CDF financial management and other NRMP II management responsibilities more tightly within the IC and USAID SO1 team.

Reduce the number and frequency of project planning and implementation meetings.

For broader project issues including impending NRMP II and Mission graduation, the core management team would work closely with the NRMP II Bilateral Review Committee (BRC).

Include new partners and develop a revised Plan of Operations for the second half of the project.

Shift the NRMP's project focus from expanding coverage to graduating communities.

Emphasize "getting it right"' in promising areas or where promising initiatives show the most rapid progress;

Refine the criteria for what constitutes a successful CAMPFIRE community that can be considered graduated;

CCG implementing organizations should develop planning approaches that include a withdrawal phase, after which outside technical assistance would be intermittent and minimal.

Develop a CAMPFIRE approach to CBNRM (and other indigenous resources). In concert with the District Environmental Action Plan (DEAP) and other initiatives, define and generalize a flexible model of participatory land-use planning/CBNRM that is linked to a set of "best practices" guidelines that can be adapted to differing contexts. The CA should sanction this approach and include provision for the "graduation of CAMPFIRE communities" and an "exit strategy" for CCG partners.

F. Getting There – NRMP II Scenarios

Currently, NRMP II support for CAMPFIRE is scheduled to terminate in September 2000. The Mission has requested an extension through FY2002, which would extend the project completion date to September 2003. The team considered several broad options to guide Mission support to CAMPFIRE under each timeframe. The team's reflections are summarized in the scenarios presented below. The team favors the longer term phase-out of USAID support, which, it is argued in the body of the report, will:

Enable a consolidation of progress in institutionalizing the CAMPFIRE principles;

Establish momentum behind the push for CAMPFIRE diversification into a wider range of resource use and revenue sources;

Help establish a favorable policy environment and other enabling conditions for long-term CAMPFIRE sustainability.

The evaluation team recognizes there are other possibilities for pursuing the above objectives and encourages broad CCG and BRC debate of the options presented for SO 1 program modifications for the remaining CAMPFIRE support under NRMP II. The team favors the FY2002-A scenario, as it contains the most progressive and responsive means of achieving results *and* closing down support.

1. Graduation FY2000

Scenario FY2000-A: Closeout with Modifications to the Existing Implementation Framework

Under this scenario, USAID would support existing grants under the IC through their current August 1999 termination dates, after which they would receive a one-year extension at reduced, perhaps 50-75%, funding levels. They would be encouraged to complement NRMP II grant funds with matching funds and resources to complete their CCG commitments. Support to new NRMP II partners and a renewed grant to ZimTrust would be structured similarly. Support to government partners would be drawn directly from the USAID budget as per approved activity proposals. USAID, in collaboration with the BRC, would transform/eliminate the PET. This represents a step toward Mission graduation and recognizes CA's enhanced capacity. Both the reduction in direct core support to grantees and the transformation of PET represent gradual and phased withdrawal of NRMP structures from within the CCG. The level of the NGO match could be adjusted by institution if circumstances warranted. USAID and the BRC would work through the IC to transform the CDF into an autonomous "sinking" grant fund that would gradually disperse funds through and beyond the PACD. When the monies have expired, the funding mechanism will cease to exist. The fund will support continued CAMPFIRE activities to the CA membership, CCG, and other actors whose proposals meet the revised CDF criteria. Other USAID operating units could consider supportive, complementary intervention during and after the bilateral program's phaseout. The CDF and possible presence of Peace Corps staff on the ground could leverage ongoing progress to enhance long-term sustainability.

Scenario FY2000-B: Closeout with No Major Modification to Existing Implementation Framework

Under this scenario, NRMP II would continue to fund existing CCG functions and operate under the same structures as are currently in place, ie, the PET and CDF. New members would receive funding to enable diversification, habitat monitoring, further devolution and bottom-up planning, to be given additional impetus to achieve greatest immediate results. At the PACD, USAID would pull out with minimal allowance for continuity and sustainability built into NRMP II. The RCSA and other USAID operating units might play a greatly reduced role in CAMPFIRE's future, especially if a small grant fund from other sources and/or Peace Corps staff can support field-based initiatives.

2. Graduation FY2002

Scenario FY2002-A: Extension through FY2002 with Transition to CDF Funding

This scenario would essentially constitute an extension and expansion of Scenario FY 2000-A. The additional time would allow CAMPFIRE to consolidate the considerable investment made under NRMP II and achieve significantly greater results in several areas. Under the extension, a provision similar to that in Scenario FY2000-A would be made for the PET, CDF, and new and existing CCG partners. Direct grants under the IC would still wind down on the same time schedule, but the additional funds would allow a much greater period of CDF funding support. The IC could be extended to oversee a two-year transition to the autonomous CDF in the post-Mission closeout period. Between 2000-2002, the fund might contain a set-aside to enable smooth termination of certain core functions carried out by the CCG partners and give them time to develop alternative funding sources for some activities. Additional time would also make implementation of CDF infrastructure grants a more realistic activity. The additional effort would be expected to advance the diversification thrust greatly, especially of CAMPFIRE ecotourism ventures. The additional time would allow USAID to assist CAMPFIRE in pursuing its policy initiative to insure producer communities are left with greater security in resource access and tenure. As new partners are brought in, the extension would establish the basis for a more integrated approach to NRM. Such a CAMPFIRE approach would employ participatory land-use planning and lead to "graduated" communities capable and motivated to manage their resources sustainably. The extension would also allow USAID to strengthen program synergy with the Mission's special objective in economic growth and democracy. As with the other scenarios, other USAID operating units could consider supportive, complementary intervention during and after the bilateral program's phaseout. The CDF and possible presence of Peace Corps staff on the ground could leverage ongoing progress.

Scenario FY 2002-B: Extension Through FY2002 Under the Existing System of Sub-Grants

This scenario would essentially constitute an extension of Scenario FY2000-B. Existing project structures would be maintained. Additional funds would permit efforts to diversify CAMPFIRE NRM activities, and especially allow ecotourism and woodland management to be substantially furthered. Policy changes and initiatives could be made a greater priority. NRMP II could be used to enhance the GOZ/CAMPFIRE aim of comprehensive habitat monitoring to complement the widely praised wildlife monitoring functions. The greatest number of incremental and specific recommendations made in this report could be implemented under this scenario. The PET could be phased out prior to the PACD but less abruptly than under the FY2000 scenarios. With careful planning, the impact of NRMP II closeout could be reduced.

Scenario FY2002-C: Extension with No Additional Funding

Essentially a second-choice scenario, it is preferable to the presently approved FY2000 closeout. Activities and budgets could be wound down more slowly. There would be no impetus to spend funds rapidly. Rather, the challenge would be in using them even more parsimoniously than at present.

Results would suffer, however. Diversification to other CBNRM regimes that employ participatory methodologies and land-use plans, and that receive assistance from new CCG partners, would not be offered the same startup incentives, and post-project activities would be limited to options outside of NRMP II control in the post-graduation context. Triage in activity selection would result in some activities being curtailed or dropped. The RCSA, Peace Corps, and other US-funded activities could mitigate the abrupt withdrawal.

G. Summary of Findings, Conclusions, and Additional Recommendations

1. Distribution of CAMPFIRE Revenues

Findings and Conclusions

For well-endowed Rural Districts, CAMPFIRE revenue is often significant. From its inception, total US dollar revenue accruing to all Rural Districts rose from an initial $655,000 in 1989 to $1,253,405 in 1996. Since the USAID-funded NRMP II began in 1994, CAMPFIRE Rural Districts earned a total of US$ 4.8 million, slightly more than half of the US$8.5 million spent to date. Overall, the Rural Districts have over time and on average respected the first revenue distribution guideline (50/35/15), rather than the more empowering 80/20 guideline, which encourages wards to budget for and administer resource management costs. Since the Programme began, 58% of revenue has been devolved to producer wards, with the RDCs retaining an average of 25% for "management fees" and 15% as a District levy. However, these average statistics disguise significant variation across the Rural Districts. It is important to note that the management revenues are spent at the ward and village levels, so that the producer communities are receiving at least indirect benefits.

NRMP II does not directly support trophy hunting. The safari hunting industry, however, does generate substantial revenues in Zimbabwe, a portion of which the Programme captures efficiently. NRMP II supports development efforts to help local communities capture and make better use of these revenues and of the resources that generate them. Revenue distribution and use primary measures of how well the CAMPFIRE principles are being applied, and they will continue to grow in importance as new resources are developed. They are used variously for compensation for animal damage to crops, social infrastructure, group enterprises such as grinding mills, and individual households in the form of cash dividends. Since this goes to the heart of CAMPFIRE, the team spent considerable effort to assess the use of revenues.

The few well-endowed Rural Districts -- Binga, Nyaminyami, and Guruve in the Zambezi valley -- provide the bulk of CAMPFIRE revenues. This has given the Programme a false appearance of profitability and drawn undue attention to its potential as a means of providing rapid and substantial benefits to the majority of program participants. However, the longer term potential for revenue from a wide range of resources may be higher than the skeptics suspect. In addition, involvement with the CAMPFIRE provides non-financial benefits in the form of participation and empowerment.

Recommendations

Have the CA issue guidelines calling on its member RDCs to be as open and transparent with their wildlife accounts as possible. This would mean sending Ward Committees copies of contracts with safari operators as well as copies of all checks made out to the RDCs by operators under contract.

Insure that communities fully understand and exercise their freedom to decide what to do with their wildlife revenue and in what form they prefer to receive it.

Have the CA commission CASS to review existing data and complementary field studies for what constitutes sufficient benefit to maintain ward, village, and household and individual commitment to conservation behavior, essentially testing assumptions #3 (and #4) of the project regarding "willingness" to invest effort in conservation.

2. Building Local Capacity

Findings and Conclusions

a. Establishing the CAMPFIRE Association as the Lead Organization

The CA has successfully assumed the leadership role. NRMP II, principally through the PET and the CDF, has contributed to rapid institutional evolution. In assessing the CA's performance and making recommendations for improvement, the recency of CA's leadership capacity development has to be kept in mind. Although nominally in the lead agency role since 1992, the CA has had only about 18 months to organize itself and install the necessary management infrastructure and processes to discharge its lead agency responsibilities fully. The Institutional Contractor (IC) has been effective in assisting the CA in acquiring essential program administration capacity. Although too early in CA's institutional evolution to posit final conclusions, it is clear from interviews with CCG members, other stakeholders, and documentary references that the CA is viewed as the lead CAMPFIRE agency. The evaluation team's field data collection visits to the RDCs, wards, and villages further indicated that the local agencies look to the CA for leadership and assistance to help them do their jobs.

b. Providing Financial Support for Decentralization: The CAMPFIRE Development Fund

The CDF was established as a $US6 million grant fund. The IC serves as the grants management unit, with specific responsibility to "execute and administer specific support grant agreements." Project documents are unclear about the long-term division of responsibility for CDF grant development, approval, and management, however, and variously allocate these responsibilities among the CA, PET, and IC. A three-page grant and proposal guideline form was accepted by all parties and distributed to all the RDCs. PET committee members agreed that two kinds of grants

were to be given: capacity-building and infrastructure. Capacity-building grants fund equipment, salaries, technical assistance, and training of new staff and community participants. The infrastructure grants are meant to fund capital investments. None have been made to date because most of the proposals have lacked the requisite social, economic, technical, and environmental feasibility analyses. In addition, for both development and implementation reasons, the decision was made to allocate the two types of grants sequentially, beginning first with the institutional capacity-building. As of February 1998, the CDF had made 20 grants to RDCs, obligating $Z24.2 million, or about $US1.6 million, from the CDF. The RDCs have made total cash and in-kind contributions amounting to 22% of the grants. Several infrastructure grant proposals have reached the advanced review stage.

It appears that there has been over-standardization in the formulation of grants. The similarity is the result of a belief that, to expand the CAMPFIRE concept nationwide to non-wildlife-producing Rural Districts, each new Rural District would need similar staff and organizational resources to coordinate NRM activities. That approach has led to the similarity among grants. The centralization of grant management responsibilities to the Rural District level tends to subvert the learning curve for self-organized village and ward communities. Sophisticated ward committees such as can be found in Mahenye find that under the grant they move from one "tutor" to another, rather than being allowed to develop their own skills in project development, training, facilitation, and management in a learning-by-doing framework.

The overall local revenue-generating capacity of the RDCs has not been adequately considered before approving grants that contain a salary line. The short-term expansion of salaried village and ward-level resource monitors and promoters places heavy resource demands that have implications for the long-term sustainability and credibility of the Programme. Districts that once relied on a sustainable combination of volunteer labor and a smaller number of salaried monitors paid out of CAMPFIRE revenue may find this more difficult to reestablish in the future if available resources were to shrink.

The defacto choice of the RDCs as the sole organization eligible for a CDF grant hampers project development by limiting the number of organizations able to request funds for CAMPFIRE-like activities. It reduces the incentive for village and ward communities to self-organize into cooperatives, user groups, and registered associations and eventually make themselves eligible for direct support.

In the 30 months remaining until the end of FY2000, it is unlikely that the CDF can finance more than a handful of infrastructure projects. Currently, there are not enough staff with engineering, economic, and environmental expertise in the CAMPFIRE administrative structure to analyze problems, examine alternatives, and develop worthy proposals in sufficient numbers to spend the remaining allotted funds. In addition, most infrastructure projects will take even longer to implement, thereby going well beyond the PACD. If the initial concept of funding US$3 million in CAMPFIRE infrastructure is to be retained, then a major infusion of assistance is needed from private sector business and technological consultants who can design projects that have the best possible chances for success. The chance of viable activities being undertaken would be significantly enhanced in relation to the life of the project. CAMPFIRE communities are increasingly ready to absorb the types of investments envisioned.

c. Empowering Local Communities

Among the CAMPFIRE CCG members, the ZimTrust has, since 1988, been involved the most directly in working with local communities at the village and ward levels. This involvement, as well at the RDCs, in developing capacity for management and decision making for sustainable NRM, particularly wildlife management, for the purpose of helping people realize the maximum benefits from the resources of their lands. The evaluation focused on ZimTrust's activities but recognizes there are other field activities, such as a DNPWLM fisheries initiative in Gokwe South.

In many ways, it can be said that the ZimTrust effectively operationalized CAMPFIRE at the village, ward, and Rural District levels through its early capacity-building support. It took the early risks by pushing the new idea of decentralization, when this was just beginning to be thought about at local levels. The ZimTrust has helped with conflict resolution, confidence-building, and awareness-building at all levels. It has provided a great deal of the support needed to help local people see the direct links between wildlife and other indigenous resources and their needs. CA management acknowledges readily that ZimTrust does very good work in the field. It relies on ZimTrust to deliver much of CAMPFIRE's essential services to the RDCs, wards, and villages.

The ZimTrust needs to develop, in collaboration with the CA and concerned RDCs, an exit plan for transferring the specific activities it is providing through NRMP II to the RDCs and communities in which it is currently working.

Recommendations

Expand the range of organizations eligible for CDF grants beyond the RDCs to any registered private or public organization in Zimbabwe. This includes NGOs, government departments, conservancies, user groups, associations, cooperatives, universities, and any other organization legally able to receive grant funds under Zimbabwe law. Current CCG members are included on this list. The only constraint to eligibility would be maintenance of minimal acceptable standards of financial accounting per USAID regulations and US law affecting the use of foreign aid funds. In practice, this requirement would eliminate the vast majority of potential grantees. However, organizations with below-regulation accounting practices (women s clubs, ward organizations, etc.) Could certainly partner with a stronger support NGO that did meet the requirements. The grant criteria should explicitly favor mentoring partnerships.

Given the excellent support the ZimTrust has given to CAMPFIRE through NRMP I and II, and the regional placement of its personnel, USAID should not rebid the services for the time remaining. Instead, it should amend the current project agreement. The last chapter contains recommendations concerning the level of support required.

Channel continued funding to the ZimTrust through the IC, as currently being done with the other CCG CAMPFIRE partners. This in no way reflects negatively upon ZimTrust's capacity to manage and report on USAID funds, which has been excellent and timely. The reasons have

more to do with creating the perception that USAID treats the CCG partners consistently and equitably. Additionally, the move would streamline management in a manner consistent with the impending reductions in USAID staff associated with Mission closeout.

3. Improving Natural Resource Management

Findings and Conclusions

Through WWF and to a lesser extent other CCG members, CAMPFIRE communities are called upon to be involved in a number of resource management activities, most having to do with wildlife. Among other initiatives are wildlife fence establishment, quota-setting, and game monitoring.

Problem animal reporting and control are important issues that have the potential to promote the goals of wildlife conservation or demoralize the people who are subject to wildlife-induced life or property loss. Similarly, it can reinforce or undermine Appropriate Authority.

Most observers consider the hunting quotas in CAMPFIRE areas to be conservative. The maintenance of trophy quality and overall wildlife numbers suggest that wildlife populations are being sustainably exploited under present conditions. An analysis by Dr. Ian Douglas-Hamilton of the current aerial survey techniques and data, done in the run-up to the CITES convention in 1997, concluded that the system effectively provided data for the management of Zimbabwe's elephants and that Zimbabwe possessed "one of the best sets of elephant data in the world."

Although various stakeholders gather data on biological systems and the physical environment, monitoring of habitat change is not being systematically performed throughout the country, and an organized effort has not yet been realized throughout the CAMPFIRE areas. Insufficient funds are currently devoted to this important aspect of CAMPFIRE.

Recommendations

Support increased research into non-lethal means of managing problem animals such as using recorded sounds and improved delivery systems for irritant sprays (i.e., capsicum).

Adopt a trophy record system that favors selection of older male animals, rather than prime males or females, an approach that has distinct advantages. The adoption of qualitative rather than exclusively quantitative measures would favor this change, which the GOZ and NGO conservation agencies should encourage.

Improve the management of lesser game. In the short term, improve reporting and completion of the hunting forms and surveys. Also, in keeping with adaptive management, use meetings or special working group sessions to determine field-based mechanisms for assessing populations and trends for lesser species. Focus on commercial exploitation of and the creation of value for lesser species such as the impala. Local/regional sport hunting, subsistence hunting and local

butcheries, live animal sales, and game viewing are possible mechanisms through which to accomplish this.

Create a CCG working group on habitat monitoring. Make an augmented effort to develop an effective strategy to monitor key environmental variables as they relate to wildlife habitat changes and conditions, land-use patterns, and baseline environmental variables. To allow for funding constraints, this could be carried out in selected areas that are representative of conditions found throughout the CAMPFIRE areas, particularly those whose proximity to protected areas permits controlled experiments as described above.

Re-examine current DNPWLM policy on live animal translocation. It is an excellent conservation tool, particularly as some areas in Zimbabwe are overstocked and drought-prone, whereas other areas have depleted wildlife populations and good habitat.

4. Improving NRMP II/SO1 and CAMPFIRE Coordination

Findings and Conclusions

Program coordination and improved communication are issues that need to be addressed at every level within CAMPFIRE. The growing number of participating institutions only makes the need more urgent. The section below addresses CAMPFIRE (CCG) institutional interrelationships. Key unresolved issues include:

Coordination of the CAMPFIRE movement.

Coordination of the NRMP II support effort.

Financial accountability throughout the movement.

Coordination of CAMPFIRE with regional activities and donors.

a. Coordination of the CAMPFIRE Movement

There clearly are differences of opinion among the CCG partners as to who should be doing what. There is also disagreement as to what constitutes "coordination" and to what extent "control" has any place. These differences appear partially to revolve around monetary control and the power it gives to build a constituency. The differences are also due to the perceived effort of the CA to identify itself as CAMPFIRE within Zimbabwe. This situation is a disincentive to potential future private sector and NGO partners joining the Programme, who believe they can apply CAMPFIRE or CBNRM principles outside the Programme without being micro-managed by the CA.

The decision to structure NRMP II to reinforce the CA as the lead CAMPFIRE agency, and allocate substantial funds to build CA capacity, seems to have altered pre-NRMP II CCG interrelationships

and responsibilities. It upset the relative positions of the actors within CAMPFIRE and reallocated project resources. The relationship between the CA and ZimTrust is an obvious example. The CA emerged from ZimTrust's shadow as the lead agency, with considerable project resources and a mandate to expand its capacity. This expansion touched upon areas of responsibility (e.g., training and technical assistance) formerly (and exclusively) in ZimTrust's portfolio. On the other hand, the CA has complained about ZimTrust's direct project line to USAID.

Instead of effective leadership and coordination of the CCG, the evaluation team saw several instances of intra-CCG squabbling over decision making prerogatives and access to project resources. This may reflect, in part, historical disagreements among the CCG members. The team also believes it reflects the absence of clearly delineated CCG roles and responsibilities and firm CA leadership in inspiring the needed sense of shared ownership in the CAMPFIRE implementation effort.

Implementing partners have been successful in instilling a sense of ownership among participating RDCs -- to the extent that they consider themselves **to be** CAMPFIRE. The work plans of these CCG members have been responsive to beneficiaries' demands for services -- although the demand is frequently larger than institutional capabilities can deliver.

b. Coordination of the NRMP II Support Effort

The SARP NRMP II project document states that "no project specific steering committees or other special management structures will be established to guide project implementation, allowing project management to focus on strengthening CAMPFIRE institutions and structures for maximum relevance and sustainability of program interventions and accomplishments" (SARP, 1994:33). There is no mention within the project document of an entity similar to the PET. The PET has, however, become just such a "steering committee." The reason is that, at the time the PET was set up, the CCG was not providing much overall guidance or direction, and the PET stepped in and effectively managed to pull things together. That is, the PET took control of CAMPFIRE coordination by default, in order to move NRMP II activities forward and "get things done." The various subcommittees were formed (e.g., policy and M&E) for much the same reason.

The PET has helped strengthen the CA and has permitted the "expanded project team" to work better than ever before. It has helped CCG partners focus and begin working together on common objectives, rather than proceeding individually. In short, the PET has improved coordination. The PET has also been successful in launching NRMP II activities and has supported the CA in building up national level representation and activities. The downside is that it has essentially replaced the CCG, which it has not similarly strengthened, nor has it improved the partnerships that could have resulted. These outcomes were **not** intended.

NGO partners are generally critical of the PET. A major criticism is that USAID set up NRMP II has for its "administrative convenience," instead of in an optimal way for CAMPFIRE. The NGOs cite the PET as an example: while it may be useful for USAID, it does not promote project administration

efficiency, effectiveness, or sustainability. USAID and the CA believe that NGO criticism stems from a generalized resistance to having their activities coordinated, reviewed, and subjected to external oversight.

The PET has served its initial purposes and no longer responds to the realities of the CA and the general CAMPFIRE movement in Zimbabwe. In particular, the PET has made it possible for USAID NRMP II project funds to be delivered to their target customers, the RDCs. Although the PET did achieve greater coordination among CCG partner institutions, it may have done so at the cost of the evolving role of the CCG within the Programme. Clearly, the CCG is weaker today than it was five years ago.

In addition, the CA has begun to use the PET as a means of imposing greater control over its CCG partners. Those not invited to a PET meeting are "out of the loop" on what is going on. In effect, the PET is restricting input from Programme partners. Moreover, there is a need for other donors and non-USAID-funded CCG partners to have a program-wide mechanism for addressing CAMPFIRE.

The recently established Bilateral Review Committee attempt to situate the Programme and NRMP II in the larger national context. Their input would be appropriate in helping to define post-PET project management structures.

c. Financial Accountability

The IC has played a major role in building the CA's capacity, particularly in terms of financial management. It has also increased the CA's capacity to manage its resources and account for them according to USAID requirements and regulations. Price Waterhouse's pre-award assessment of the CA recommended that the IC continue this close assistance and oversight role with the CA.

CA/CCG grantees continue to need limited assistance from the IC to execute their project administration responsibilities successfully. The RDCs will continue to need technical services and training in this area.

Strengthening the financial management capacity of the CA was well done and very useful to the CAMPFIRE Programme. New CCG grantees could benefit from similar assistance if such services could be extended.

d. Coordination of CAMPFIRE with Regional Activities and Donors

New CBNRM programs in neighboring countries have adopted CAMPFIRE's principles but not the elephant focus and history. Regional sharing of common and different experiences and the drawing of lessons learned have become major aspects of the regional program. Under the reorganized regional office, diversified CBNRM approaches have become a focus of activity.

Collaboration between the regional program and the bilateral implementation effort has improved significantly in the several years since the last mid-term evaluation. Synergy between similar CBNRM programs is developing across countries. Shared objectives and agendas are strengthening individual programs. Other programs, for example, have learned from CAMPFIRE's strengths -- its principles, its commitment to empowerment, and its strong adaptive management approach to wildlife and program coordination -- and from CAMPFIRE's weaknesses -- limited devolution and constraining policies that make change difficult and foster too great a focus on a single resource. Progress has been limited by the staff and time the RCSA has been able to afford.

Recommendations

USAID should concentrate its support of CA's Harare-based activities in two specific areas -- program advocacy and policy dialogue. *Program advocacy* includes national and international initiatives aimed at informing individuals and groups about the CAMPFIRE movement and promoting a positive, constructive image. The CA has carried out this activity well in the past. Effective advocacy will require using the most current and appropriate communication technologies (e.g., Internet, multi-media presentations). *Policy dialogue* requires proactively engaging policy makers in discussions of important policy issues of direct relevance to CAMPFIRE, with the intent of promoting the passage of sound legislation. It will also include dialogue on regulatory matters pertaining to the implementation of laws. The CA will have to strengthen its policy advocacy skills and draw upon CCG resources, such as CASS and ART, to complement and help build this capacity.

Since USAID is going to graduate Zimbabwe within the next five years (and perhaps end funding to NRMP II even sooner), it needs to begin *now* to relax its control of the project and avoid micro-management. It will need to relocate de facto project control and authority to Zimbabweans, who eventually will have to assume complete program responsibility.

The CA should request RCSA assistance in accessing the lessons of devolution and working with CBOs and local level producer communities. This could involve workshops, exchange visits for the CA Board, RDC executives, and others, including community-based organizations (CBOs).

The RCSA should take the lead in defining an appropriate USAID role in supporting southern Africa regional states and NGO concerns in advocating national and regional positions on important policy and economic issues related to wildlife and other resource management and use at international fora/venues.

5. Devolution of Authority

Findings and Conclusions

The essential "owners" of CAMPFIRE within Zimbabwe are the rural communities and their elected representatives at the RDC level. Their natural resources and socioeconomic well-being are the

subject of CCG and NRMP II efforts to achieve sustainable management. Both renewable and non-renewable natural resources have come to be the focus of community attention. Since each Rural District possesses different resources, their strategies must be different. RDC partners working to achieve CAMPFIRE objectives include government, NGOs, and other private sector groups, national and international. CCG members are the central Programme partners, which through the leadership of the CA, with external donor funding, are able to provide capacity-building and support institutional strengthening in these Rural Districts.

In the earlier years of CAMPFIRE within Zimbabwe, the NGOs played an important role, in partnership with the DNPWLM and a few special Rural District leaders, in putting together the conceptual and applied realizations of what has become CAMPFIRE. During the past five years, the RDCs have risen to the challenge and have developed their own CAMPFIRE Association advocacy NGO agency to coordinate and articulate their needs before the GOZ, donors, NGOs and the private sector. This evolution represents an important, deepening ownership of CAMPFIRE by its intended beneficiaries.

The CAMPFIRE Programme, as a Zimbabwean initiative, should at some level be "owned" by all institutions adhering to CAMPFIRE principles. That the RDCs wish to claim "ownership" of CAMPFIRE through their CA should be seen as a very positive development -- and permit supporting institutions to serve more in an advisory and technical support role to this growing CAMPFIRE constituency. However, for the movement to really take root and expand, it would be a mistake to relegate CCG and business partners to simple external roles such service provider or commercial associate.

Recommendations

The CA, as the lead agency within the Zimbabwe CCG network, should take the lead in terms of policy dialogue, national advocacy of CAMPFIRE principles through its RDC constituency, and championing the needs for continuing policy reform aimed at devolving sufficient authority over natural resources to local communities. It should play a pivotal role in insuring program coordination, information flow, and program monitoring, but much of the work in these latter areas should be accomplished through facilitation and delegation of responsibility. The CA should also take the lead in establishing standards in marketing CAMPFIRE-related products.

Given the important challenges that Zimbabwe's CAMPFIRE faces in coming years, both to maintain current wildlife resources and extend CAMPFIRE activities to other natural resources, it is time that CAMPFIRE collaborators, NGOs, the CA, with its RDCs, government agencies, begin to put past differences behind them and begin truly collaborating to reach their common goal of further devolution. Between them, CAMPFIRE collaborators have an impressive range of skills and experience that can potentially lead the Programme well into the next century.

6. Land Use and Diversification

Findings and Conclusions

Diversification of the sources of economic benefit from improving NRM depend on the inherent potential of both the resources and the political-ecological context. Assessment generally underlies development projects espousing a NRM objective. CAMPFIRE's capture of a ready stream of revenue renders it somewhat exceptional, and a single resource indicator -- trophy quality -- determined program organization and focus in the early years. When some four years ago the Programme began diversifying, institutional momentum and the undeniable importance of wildlife have kept other resources in the background.

In this section, the evaluation team assesses the progress and apparent potential of broadening the economic base upon which the CAMPFIRE principles are being tested. In this respect, several issues may prove key to the future character and composition of the CAMPFIRE movement:

Actual land-use potential, the institutional capacity to make such a determination, and the means of devising an appropriate land use strategy based on the assessment.

Diversification of the benefit streams: the economic potential of sustainable exploitation of the resource and the prospects for channeling revenues in a manner consistent with the movement's philosophy.

The depth and breadth of CAMPFIRE management to accommodate new resources, markets, and modalities of production and distribution.

The feasibility of using NRMP II funds to bring in new institutional partners to meet this expanding mandate.

The issues are vital and underlie the rationale in recommending continued funding for NRMP II under the scenarios developed elsewhere in the document. The evaluation has already signaled that under CAMPFIRE, WWF has made significant steps toward participatory land-use planning (cf Section II.B).

Recommendations

Add new partners to respond to new technical and policy needs associated with diversifying and expanding coverage.

Strengthen participatory land use planning activities and develop guidelines for bringing non-wildlife and ecotourism models to the point where they can be adapted and replicated.

7. Advocacy and the International Context

Findings and Conclusions

As indicated in the SOW, in the run-up to the 1997 CITES Conference of Parties, "CAMPFIRE came under intense attack from a variety of animal welfare groups opposed to trophy-hunting of wildlife, particularly elephants, and the resumption of the trade in elephant ivory." The debate over this issue, which ultimately played out in the US Congress raised a number of matters of interest not only to NRMP II management but also, more generally, to the US foreign assistance program. In this section the overall issue is divided into four related areas:

Regional, international, and/or US-based advocacy for downlisting the African elephant and its appropriateness to CAMPFIRE and NRMP II.

The role, performance, and results of ART's (and CA's) efforts in this area.

The USAID Mission's response regarding the use of US funds for such activities.

An advocacy role is appropriate and justified for governments, which participate in the international politics of wildlife conservation. Government's devolution of Appropriate Authority to communities engages them directly and thus, in turn, their NGO partners. In addition, CITES is as much NGO- as government-driven, further substantiating the appropriateness of Zimbabwean NGOs supporting CAMPFIRE in participating in the international dialogue surrounding the trade in wildlife products.

The marketing and advocacy activities undertaken by ART and CA fall within the norms of what USAID has actively supported in other sectors, such as in many export promotion programs for non-traditional agricultural products or for certified tropical timber products. CITES and other regulatory structures are legitimately the object of scrutiny as to whether they constitute non-tariff barriers to trade. Without taking either a technical or moral stand on trophy-hunting of elephants, this conclusion reflects widely held US values grounded in fundamental beliefs about the importance of free trade, the democratic process, the rights of indigenous peoples, and the value of a vibrant civil society. As documented in the body of the report, this is what USAID bought into with its support to the international activities financed by NRMP II.

Recommendations

Allow the CA to continue utilizing ART's services and, where necessary, collaborating with ART to obtain necessary financial support to obtain those services.

Have ART continue to help the CA explore the international market for non-consumptive wildlife use, including game-viewing and cultural and ecotourism. A major or lead role in following regional activities would be appropriate in this regard. It is important to CAMPFIRE to stay abreast of strategies and marketing techniques of potential use to the CA membership. Related

networking and facilitation of cross-country visits and other strategic encounters would also play to ART's strengths.

Work with CCG members, especially the CA, to use the Internet to link CAMPFIRE globally with affiliated interests in such subject areas as CBNRM, responsible ecotourism, and indigenous rights groups.

Assist the CA in creating and maintaining an Internet-based discussion forum where substantive and controversial issues can be debated and constructive suggestions from all quarters incorporated into the CAMPFIRE process. In this way, individuals and organizations, including animal welfare interests, could offer alternative perspectives on such questions as problem animal management, wildlife population dynamics, sustainable finance, resource tenure, wildlife habitat and monitoring, PRA, and other topics that could help guide CAMPFIRE's adaptive management model.

8. Adaptive Management

Findings and Conclusions

Scientific findings and the needs of society may, for example, signal a need to adapt resource management to new information. Adaptive management, a form of "learning by doing," means steadily adjusting management in the light of experience in order to rebuild healthy ecosystems. Assessment and monitoring are integral to adaptive management, which requires field-based data from local resource users.

Recommendations

Have CASS continue playing an active role in CAMPFIRE policy analysis and applied research. Encourage it to develop its policy dialogue skills so its analysis may better contribute to policy decision making. Specifically, CASS should: (1) write policy briefs that summarize major findings and recommendations; (2) seek to expand the form in which studies are presented so that they are accessible by sub-national audiences, e.g., they might work with *ACTION Magazine* to put some policy related studies in an animated strip format in the magazine and other educational materials; and (3) seize opportunities to make its work known through popular media, public speeches, and participation in CAMPFIRE meetings, workshops, and training.

Although the results must feed into an adaptive management framework, establish a process that allows CASS, when tasked with a study, to determine its timing and precise content internally. The CCG should help define the subject areas and scope of inquiry, such as tenure policy, ecotourism, and impact of natural resource policies.

9. Sustainability of CAMPFIRE after NRMP II

Findings and Conclusions

The evaluation stresses the need to revise field level approaches in CAMPFIRE to incorporate greater bottom-up planning, with an aim toward sustainable NRM-based resource use, improved management capacity of enterprises, and social infrastructure in place. Present NGO experience has not yet reached efficient systematic methods to achieve this combination of financial, social, economic/institutional, and ecological elements that in turn coalesce into local level "graduation." Notable exceptions are found, however, and refinement and replication of these successes are advocated over allocating project resources widely and too thinly. These local "models" can serve as foci for extending field successes.

To create a sustainable financing vehicle that will remain in place beyond the life of the project, capitalization of the remaining funds would be appropriate. Capitalization would provide a sustainable financial mechanism that would continue to provide small-scale support for activities in the country consistent with NRMP II goals and the underlying principles of CAMPFIRE. It would also slow the rate of spending to a level more in keeping with ongoing local absorptive capacity and would build on the first round of District-level capacity building grants. A prolonged and steady access to even limited funds would more likely to allow for high-quality field results. The DA could easily establish this mechanism during the closeout period, but after closeout it would not have in-country USAID management.

Capitalization could involve either an endowment or a sinking fund and, in both cases, prudent management would require that the capital stay off-shore – that is, in the United States. Annual transfers for grant-making would be made to a local organization charged with developing, approving, and monitoring the grants.

Recommendations

Create a sustainable financing vehicle, to remain in place after the project. Capitalize the remaining funds, and link this funding mechanism with other Agency operating unit and USG activities such as stationing Peace Crop volunteers in CAMPFIRE areas.

H. Lessons Learned

The CAMPFIRE and NRMP II experiences are rich in development and management lessons, and many of these have been brought out elsewhere in the extensive literature. This evaluation calls attention to a number under the following rubrics that stood out:

- Planning for public scrutiny
- Legitimacy of Non-Governmental Organizations
- The need for strong partnerships
- The importance of cultural values
- The inadequacy of protected area systems to protect biodiversity
- Balancing results and flexibility in programming

II. INTRODUCTION

A. Description of Activities Evaluated

This evaluation addresses the second phase of USAID support of CAMPFIRE. USAID initiated that support in 1989 under the Southern Africa Regional Program (SARP) and has continued to support CAMPFIRE under the regional SARP Natural Resources Management Project (690-0251.13), now absorbed under the newer Initiative for Southern Africa (ISA), through the bilaterally-managed Natural Resources Management Project, Phase II (NRMP II) . NRMP II (613-0241) began in September 1994. The USAID contribution was US$20.5 million, of which $16 million represents bilateral program funding. USAID/Zimbabwe's support under NRMP I was a part of a larger regional project assisting several pilot efforts in four Districts of rural Matabeleland to test CBNRM approaches. The second phase builds on this initial experience and expands coverage to the national level. Having moved beyond the pilot phase, the project is now largely a bilateral effort and is managed as such.

The goal of Phase II, as described by its logical framework (Appendix A), is to use natural resources to develop economically sustainable communities on lands marginally suitable for agriculture. The purpose of the project is two-fold:

(1) to develop community-based programs to increase income and sustain natural resources; and
(2) to improve local capabilities to protect the resource base.

USAID and its implementation partners agreed to an implementation strategy as constituted in the CCG. The resulting NRMP II -- Zimbabwe Plan of Operations (June 1995) served as the basis for a series of contracts, grants, and sub-grants that guide the specific activities evaluated in this document.

NRMP II's design, contained in the SARP Project Amendment (USAID 1995) (and in Project Document 613-0241), embodies adaptive management principles that use annual planning updates and quarterly implementation workshops. Notably, USAID/Zimbabwe and its CCG partners refocused the results orientation of the project so as to reflect the redesigned Mission Strategic Objective, SO1. The new Results Framework (RF) situates the program squarely within the Agency's Strategic Plan (SP), specifically contributing to the objectives of "sustainable natural resource management" and "biological diversity conserved."

Because of the Mission's scheduled graduation and closeout in 2003, the new SO1, "NRM strengthened for sustainable development of CAMPFIRE communities," was not expanded beyond the scope of the current NRMP II project. While not ignoring household level measures, the current RF and indicators underscore the local (village/ward) community level focus of this innovative, conservation-based community development program.

Table 1: USAID Flow of Funds in NRMP II as of February 1998, in nominal US$

Recipient	Per Project Document	Per Contract Agreement	Obligated to Contract	Spent to Date	Obligated not Spent	Remaining not Obligated	Remaining Total	Spending Started
CDF	6,000,000	6,000,000	1,674,451	636,630	1,037,821	4,325,549	5,363,370	11/96
DA/PW	2,675,000	3,453,613	3,453,613	1,814,977	1,638,636	0	1,638,636	11/95
DNPWLM	1,500,000	1,500,000	208,048	60,764	147,284	1,291,952	1,439,236	
MLGRUD	200,000	200,000	0	0	0	200,000	200,000	
CA	1,750,000	1,750,000	1,347,340	852,355	494,985	402,660	897,645	
Zimtrust	4,225,000	4,587,428	4,587,428	3,922,777	664,651	0	664,651	9/95
WWF	1,570,000	1,600,000	666,667	445,083	221,584	933,333	1,154,917	6/96
CASS	1,050,000	1,050,000	629,521	396,010	233,511	420,479	653,990	1/96
USAID	1,530,000	358,959	358,959	335,000	23,959	0	23,959	
Totals	20,500,000	20,500,000	12,926,027	8,463,596	4,462,431	7,573,973	12,036,404	

Notes:

Zimtrust, DNP and MLG do not work on contracts as the other recipients do.
Zimtrust works on grants. USAID "commits" or obligates funds to the grantee.
Zimbabwe government units work with "earmarked" USAID funds which are released on invoice.
USAID line item for contract management acts partly as a contingent fund.
Zimtrust expenditures are through Nov. 30, 1997.
Zimtrust expenditures include ART and Action.

B. Evaluation Purpose, Methodology, and Scope of Work

CAMPFIRE is an important program. It is among the first to test the notion that conferring specified proprietary rights and related economic benefits to local communities that share access to a given set of natural resources will engender responsible stewardship. With appropriate support, the program design anticipates sustainable improvements in resource management and sustained benefits from a new stream of revenue. With its 10-year history, the lessons learned from CAMPFIRE are of real value for similar programs in the region and elsewhere.

CAMPFIRE exemplifies a new paradigm of conservation-based community development, founded on the premise that, by creating value in natural resources and giving communities a direct link to that value, these resources will provide sufficient incentives for the application of sustainable use regimes. That is, when a community receives direct benefits in excess of the perceived costs of management, and its access to those benefits is secure over time, it will choose to manage its resource base sustainably. This thesis attracts controversy where the principal natural resource is wildlife and the principal use is sport hunting of elephants and other fauna.

Consistent with this thesis, in 1997 Zimbabwe successfully requested that its elephant population be moved from Appendix I of the Convention on International Trade in Endangered Species (Flora and Fauna) (CITES) to Appendix II to permit limited sport hunting of elephants and ivory trade with Japan. CAMPFIRE in turn became a focus of animal rights activists that led to a direct Congressional vote on continued USAID support and to a request by USAID for this evaluation of the program. It is important to note at the outset of this report, as the evaluation team stresses, that neither CAMPFIRE nor NRMP II are ideal models, nor should they be expected to be.

This evaluation is called for based on USAID's own criteria. Following reengineering, USAID Strategic Objective (SO) teams are responsible for achieving results and using formal evaluations in a discretionary manner to help achieve them. Operating Units, including the USAID Mission in Zimbabwe, support SO team evaluations when, among other situations:

- performance monitoring indicates an unexpected (positive or negative) result on a critical measure;
- a key management decision must be made about directions in an activity, intermediate result, or SO, but there is inadequate information for making the decision;
- annual (or periodic) reviews in the operating unit or with the host country identify key questions to be resolved on which consensus must be developed;
- formal or informal feedback from participants, partners, customers, or other informed observers suggests that implementation is not going well or not meeting the needs of intended customers;
- there is a breakdown in a critical assumption or intermediate result supported by another donor

that challenges the validity of the strategy to achieve the SO; or

- an operating unit believes extracting key "lessons learned" or documenting experience is important for the benefit of other Operating Units or future programming in the same country. (USAID 1997)

1. Purpose

In the case of this project, key management decisions are required because of the impending Mission closeout, the expansion of the project, and the proposed addition of new members to the CCG. The focus on broader issues such as the role of advocacy and lobbying, the program's association with sport hunting as a conservation tool, and the program's pioneering role in CBNRM suggest the timeliness of extracting key lessons of interest to a wider audience and of relevance to other Operating Units. Documenting performance will help clarify the Congressional debate regarding the relative merits and liabilities of continuing US support to CAMPFIRE.

This evaluation takes a hard, objective look at the CAMPFIRE effort so as to answer some basic questions of interest to a diverse array of readers. The specific objectives are to:

1. Assess NRMP II responsiveness to the findings and recommendations of the last project evaluation;

2. Document USAID-funded contributions to CAMPFIRE to date;

3. Assess the performance of each implementing partner in fulfilling its respective roles and responsibilities under NRMP II;

4. Document results and impacts to date;

5. Address certain key policy, planning, management, and implementation issues; and

6. Recommend revised implementation approaches and arrangements for improving NRMP II achievement and impact, and the prospects for the long-term sustainability of CAMPFIRE, as NRMP II progresses toward its final stages of implementation and closeout. (The complete Scope of Work is included as Appendix B.)

2. Methodology

The Mitchell Group, Inc. (TMG) evaluation team used a four-phase methodology designed to insure quality and objectivity within a participatory and collaborative approach. Phase One consisted of establishing definitions and developing the analytical framework and operational workplan. Phase 2 involved data-gathering and identification of key issues, such as devolution, diversification, and sustainability. To judge impact and to document performance, the team attempted to corroborate its

information base by using multiple data sources -- both primary and secondary, and qualitative and quantitative -- to corroborate its findings. The team obtained most primary data through interviews, focus group discussions, and direct observation. This work was carried out concurrently with an intensive review of substantive and process-related documents. In the case of the CA, where existing multiple reviews were available, meta-analysis complemented the fieldwork to reach synthesis and conclusions.

Following an internal consensus-building workshop and completion of a mid-course progress report, the team entered Phase 3, entailing analysis and report preparation. Here subject matter specialists went beyond the shared information base to address specific evaluation questions more deeply. The consensus-building effort continued as more detailed information was assembled. The intent was to insure that the write-up represented a genuine team perspective and did not consist of a series of specialists' reports. The Team Leader assembled, blended, and reconciled the individual contributions of team members to produce a unified draft report. Phase 4, ownership and completion of the final report, began with a USAID and CCG stakeholder review, followed by consultations between the Team Leader accompanied by one other team member and the stakeholders with respect to core conclusions and recommendations.

C. The Evaluation Team

The evaluation team consisted of six US-based professionals from a diverse range of professional disciplines and with extensive development experience and a local logistical support person. No team member had any direct prior experience with the CAMPFIRE Programme. As such, the team was able to conduct a truly objective examination of the project and its performance and impact to date. The team members and their roles are as follows:

- **Dr. Frederick W. Sowers**, Team Leader and environmental geographer, focused on general USAID issues, CAMPFIRE's regional dimension, lobbying, ART, and overall evaluation coordination and reporting.

- **Dr. Thomas J. Cook**, Research Triangle Institute's (RTI) Principal Scientist in Social Science and International Development, addressed devolution, socio-political issues of CAMPFIRE, and the CA, and USAID strategic planning.

- **Dr. Robert Davis,** an economist specializing in natural resource management, was responsible for wildlife and land management issues and the economics of wildlife management and alternative NRM options.

- **Dr. Lynn Ellsworth,** who specializes in institutional and economic analysis of non-profit and public organizations, addressed CAMPFIRE sustainability issues and the CDF, CA, and IC and their interrelationships.

- **Dr. Richard Alan Swanson,** a social anthropologist, focused on the benefits gained from natural resources, diversification options, and devolution of authority to local producer communities. Dr. Swanson also contributed to the report preparation and stakeholder review processes.

- **Dr. Richard G. Ruggiero,** whose principal fields are wildlife ecology and management, looked at data quality for monitoring wildlife, including quota-setting, the ecological and technical merits of wildlife management over other options, and land-use planning and management schemes.

D. Implementation Under NRMP II

1. USAID Funding Under NRMP II: Organizations, Amount, and Purpose

As noted, USAID has been providing financial support to CAMPFIRE since 1989 . Initially it provided support through NRMP I under the Initiative for Southern Africa, formerly known as Southern Africa Regional Program. NRMP II was launched in September 1994 with a USAID contribution of US$20.5 million, of which $16 million are bilateral funds.

A diverse group of partner organizations, government and non-governmental, have also been assisting CAMPFIRE since the early years of the program. They now provide their assistance under NRMP II and receive USAID funds for some or all of the support they give. These organizations currently include:

- CAMPFIRE Association;
- Department of National Parks and Wildlife Management, Ministry of Mines, Environment, and Tourism;
- Ministry of Local Government and National Housing;
- The Zimbabwe Trust;
- Centre for Applied Social Sciences, University of Zimbabwe;
- World Wide Fund for Nature/World Wildlife Fund;
- Africa Resources Trust (to December 1997); and
- Action Magazine.

Table 2 shows the total funding for NRMP II, how it has been allocated, and how it has been spent. The September 1994 program document (SARP Natural Resources Management 690-0251 PP Amendment #1) showed an initial allocation that carried through with little modification to USAID's contract and grant agreements almost perfectly. The notable exception was the IC, whose allocation in the contract was increased from US$2,675 m. to US$3,454 m., with the increment coming from USAID's contract management line. Spending by some partners has proceeded at a pace that will exhaust the amounts allocated by September 30, 1999. Other recipients, including the GOZ partners, WWF, and CDF, have thus far exhibited substantially slower rates of spending. Subsequent sections of this document review the performance by all CAMPFIRE partners in NRMP II.

Table 2: CAMPFIRE Programme Allocation of Revenue, 1989-1996 (ZW$)

Year		Disbursed to Communities (1)	Wildlife Management (2)	Council Levy (3)	Other (4)	Total (5)	%Annual Change
1989		$396,005	$173,180	$60,386	$25,579	$655,150	
1990		$509,994	$300,310	$129,854	$55,623	$995,781	52%
1991		$1,203,673	$823,441	$451,786	$213,544	$2,692,444	170%
1992		$3,074,278	$1,059,673	$589,914	$91,185	$4,815,050	79%
1993		$5,560,958	$2,331,210	$1,639,316	$210,050	$9,741,534	102%
1994		$7,794,511	$2,583,326	$1,219,653	$349,137	$11,946,627	23%
1995		$8,259,680	$3,086,311	$1,684,426	$228,688	$13,259,105	11%
1996		$8,388,566	$4,085,950	$3,031,985	$78,504	$15,585,005	18%
total		**$35,187,665**	**$14,443,401**	**$8,807,320**	**$1,252,310**	**$59,690,696**	

Table 3: CAMPFIRE Programme Allocation of Revenue, 1989-1996 (US$)

Year	Exchange Rate (6)	Disbursed to Communities (1)	Wildlife Management (2)	Council Levy (3)	Other (4)	Total (5)	%Annual Change
1989	*2.126*	$186,268	$81,458	$28,404	$12,032	$308,161	
1990	*2.472*	$206,308	$121,485	$52,530	$22,501	$402,824	31%
1991	*3.751*	$320,894	$219,526	$120,444	$56,930	$717,794	78%
1992	*5.112*	$601,385	$207,291	$115,398	$17,837	$941,911	31%
1993	*6.529*	$851,732	$357,055	$251,082	$32,172	$1,492,041	58%
1994	*8.2122*	$949,138	$314,572	$148,517	$42,514	$1,454,741	-2%
1995	*8.724*	$946,777	$353,772	$193,080	$26,214	$1,519,842	4%
1996	*10.07*	$833,025	$405,755	$301,091	$7,796	$1,547,667	2%
total		**$4,895,527**	**$2,060,913**	**$1,210,545**	**$217,996**	**$8,384,981**	

Table 4: CAMPFIRE Programme: Percentage Allocation of Revenue By Year (1989-1996)

Year		Disbursed to Communities (1)	Wildlife Management (2)	Council Levy (3)	Other (4)	Total (5)
1989		60.44%	26.43%	9.22%	3.90%	100%
1990		51.22%	30.16%	13.04%	5.59%	100%
1991		44.71%	30.58%	16.78%	7.93%	100%
1992		63.85%	22.01%	12.25%	1.89%	100%
1993		57.09%	23.93%	16.83%	2.16%	100%
1994		65.24%	21.62%	10.21%	2.92%	100%
1995		62.29%	23.28%	12.70%	1.72%	100%
1996		53.82%	26.22%	19.45%	0.50%	100%
total		**58.95%**	**24.20%**	**14.75%**	**2.10%**	**100%**

1. Disbursed to communities - revenue allocated to sub-district CAMPFIRE institutions.
2. Wildlife management - revenue allocated for wildlife and program management.
3. Council Levy - revenue allocated to district council general account.
4. Other - revenue invested in capital development projects and RDC levy to CAMPFIRE Association.
5. Not Allocated - revenue not allocated but retained by RDC for general account.
6. Mean annual exchange rate based on RBZ end of month exchange rate.

Table 5: CAMPFIRE Programme: Income by Year, 1989-1996 (ZW$)

Year		Sport Hunting (1)	Tourism (2)	P.A.C. Hides & Ivory (3)	Other (4)	Total	%Annual Change
1989		$694,773	$60	$11,256	$37,610	$743,699	
1990		$1,120,864	$7,082	$105,917	$141,639	$1,375,502	85%
1991		$2,393,713	$59,657	$78,242	$379,243	$2,910,855	112%
1992		$5,899,669	$96,878	$48,199	$174,913	$6,219,656	114%
1993		$9,101,816	$137,730	$97,858	$350,804	$9,688,208	56%
1994		$12,757,694	$328,360	$22,747	$380,811	$13,489,612	39%
1995		$12,883,712	$478,653	$101,939	$420,528	$13,884,832	3%
1996		$16,679,327	$234,381	$401,479	$366,842	$17,682,030	27%
total		**$61,531,568**	**$1,342,801**	**$867,637**	**$2,252,390**	**$65,994,397**	

Table 6: CAMPFIRE Programme: Income by Year, 1989-1996 (US$)

Year		Sport Hunting (1)	Tourism (2)	P.A.C. Hides & Ivory (3)	Other (4)	Total	%Annual Change
1989	*2.126*	$326,798	$28	$5,294	$17,690	$349,811	
1990	*2.472*	$453,424	$2,865	$42,847	$57,297	$556,433	59%
1991	*3.751*	$638,153	$15,904	$20,859	$101,105	$776,021	39%
1992	*5.112*	$1,154,082	$18,951	$9,429	$34,216	$1,216,678	57%
1993	*6.529*	$1,394,060	$21,095	$14,988	$53,730	$1,483,873	22%
1994	*8.2122*	$1,553,543	$39,985	$2,770	$46,373	$1,642,671	11%
1995	*8.724*	$1,476,812	$54,866	$11,685	$48,204	$1,591,567	-3%
1996	*10.07*	$1,656,338	$23,275	$39,869	$36,429	$1,755,912	10%
total		**$8,653,211**	**$176,970**	**$147,741**	**$395,044**	**$9,372,966**	

Table 7: CAMPFIRE Programme: Percentage Income By Year of Activity 1989-1996

Year		Sport Hunting (1)	Tourism (2)	P.A.C. Hides & Ivory (3)	Other (4)	Total
1989		93%	0%	2%	5%	100%
1990		81%	1%	8%	10%	100%
1991		82%	2%	3%	13%	100%
1992		95%	2%	1%	3%	100%
1993		94%	1%	1%	4%	100%
1994		95%	2%	0%	3%	100%
1995		93%	3%	1%	3%	100%
1996		94%	1%	2%	2%	100%
total		**93%**	**2%**	**1%**	**3%**	**100%**

1. Sport Hunting - income earned from lease and trophy fees paid by safari operators.
2. Tourism - income earned from the lease of wildlife areas for non-consumptive tourism.
3. PAC hides & ivory - income from the sale of animal products primarily from problem animal control.
4. Other - income from the sale of live animals, collection of ostrich and crocodile eggs, etc.
5. Mean annual exchange rates based on RBZ end of month exchange rates. Note: Rate April 1998 was 15.50 ZW$ = 1US$, which illustrates continuing inflation problem and value of incoming hard currency from wildlife revenue.

The second phase got underway slowly. The reason in part was difficulty in putting the IC mechanism in place. As can be seen from Table 2, some partners started spending as late as July 1996, or more than 18 months into the project. The first CDF grant was not made until November 1996, 26 months into the project. As of February 1998, somewhat more than 40% of the total budget had been expended. The purposes of each contract or grant by recipient are as follows:

CAMPFIRE Association. The CA was established in 1991 and registered with the Ministry of Public Service, Labor and Social Welfare as a NGO. In 1992 it was accorded lead agency status at the Hunyani Hills workshop. Its purpose is to represent the interests of the RDCs and to promote and serve in the CAMPFIRE program. By 1997, 36 of the 57 Councils had become Association members. RDCs without Appropriate Authority status have associate membership in the CA, and it can extent honorary and ex-officio membership to any person or group invited to join by the General Assembly at the Annual General Meeting. As the lead CCG agency for coordination of CAMPFIRE activities nationwide, the CA is expected to: provide services to members and communities; lobby on behalf of member and program interests; disseminate program information; facilitate outside training for members; coordinate the activities of CCG members; assist in developing marketing strategies for program-generated products; and secure funds for program-related infrastructure development. The CA has primary responsibility for mobilizing RDCs and CCG partners and resources to develop viable project proposals for funding under the CDF. The CA had spent less than 50% of its total allocation by the end of February 1998.

CAMPFIRE Development Fund. The CDF is a funding mechanism for two types of grants: "institutional" Community Capacity Building Grants and "infrastructural" Community Natural Resources Grants. In addition to funding specific community-based NRM activities, the CDF is supposed to strengthen the leadership capacity of the CA, strengthen the capacities of the RDCs to define and implement CAMPFIRE activities, and improve coordination of CCG members implementing CDF-funded activities. The CDF had utilized about 10% of its total allocation by the end of February 1998.

Institutional Contract for CAMPFIRE Support. The IC serves as the financial and grants management unit for NRMP II and helps the CA and the CCG benefit from the programmatic funds made available through NRMP II. Although originally conceived as a secretariat to the CA and CCG (through the PET), responsible for assisting in the day-to-day management of CAMPFIRE activities, the final agreement (CCG 1995) defined the IC's objectives more precisely:

- execute, manage, and administer grants to the CA and its RDC members, *as well as those members of the CCG which require such assistance;* and

- build, through specific in-service training programs relating to the management of USAID funds, the general management and administrative capacities of the CA *and its RDC members*, as well as those CCG members which require such assistance."

The IC performs these functions for USAID-financed grants to participating CCG implementation partners -- CA, WWF, and CASS -- and participating local authorities. The IC had spent over 50% of its total allocation by the end of February 1998.

Government of Zimbabwe (GOZ) Support Grants.

Department of National Parks and Wildlife Management. The DNPWLM began as the lead agency, but its role within CAMPFIRE has diminished considerably during Phase II, and, as noted, the CA is now the lead organization. The DNPWLM is expected to continue providing technical inputs to the program. The DNPWLM had consumed less than 5% of its total allocation for CAMPFIRE activities by the end of February 1998.

Ministry of Local Government and National Housing. The MLGNH approves project matters, including CDF grants. It is a member of the NRMP's bilateral review committee. The plan for the MLGNH's participation in the Programme is being finalized. Originally, it was expected to advise and assist on CAMPFIRE policies and practices at the District level. It had spent none of its allocation by the end of February 1998.

CAMPFIRE Collaborative Group (CCG) Support Grants.

Zimbabwe Trust. ZimTrust assists communities and RDCs in developing and strengthening the skills and institutions needed to manage wildlife and other resources. ZimTrust, including its sub-contractors, ART and Action (see below), had spent 86% of its total allocation by the end of November 1997.

Africa Resources Trust. ART, under a subcontract with ZimTrust that ended in December 1997, provided an information service and center for the CCG and to lobby for and promote CAMPFIRE interests among regional and international regulatory organizations. NRMP II called for ART to monitor and analyze international trade in wildlife, and it was expected to aid in marketing program-generated products, support training, maintain a library and database, collaborate with CA in establishing a CAMPFIRE information service, and lobby for the Programme at the higher levels of the national government.

Action. Also funded under the ZimTrust grant, Action Magazine concentrates on education and information within CAMPFIRE districts and to develop a CAMPFIRE curriculum, accompanied by associated educational materials and participatory teaching techniques.

World Wide Fund for Nature. WWF has several functions under NRMP II: monitor and research the economic and ecological aspects of CAMPFIRE's activities; conduct NRM training at the district, ward, and village levels; participate with communities in resource inventories and land-use planning; and publish and disseminate research. WWF, which started later than other agencies, had spent less than 30% of its total allocation by the end of February 1998.

Centre for Applied Social Sciences. CASS's role is to: study program policies and activities; conduct post-graduate training in the social and political aspects of NRM; monitor the social and economic impacts of the program; promote discussion and debate of program policies and principles; and disseminate information. CASS had spent less than 35% of its total allocation by the end of February 1998.

New Partners. New partners in the CCG include MMET's Forestry Commission and Department of Natural Resources, as well as a local NGO, Southern Alliance for Indigenous Resources (SAFIRE). None of them had received NRMP II funds as of March 1998, but each has prepared funding proposals that are receiving favorable USAID review.

US Agency for International Development (USAID). The Agency, through its SO team, provides day-to-day management and oversight of all activities sponsored by the project, including the IC and CDF. It also ensures effective achievement of stated SO1 objectives. Additionally, USAID manages all strategic studies, audits, and evaluations financed by the project, as well as those program activities that link with the greater ISA-regional NRMP effort.

2. Other Donor Support

The Netherlands. The other significant external donor to CAMPFIRE is the Netherlands Government Directorate General of International Cooperation. The Netherlands Government supports CAMPFIRE through two mechanisms:

- Institutional Support to the CAMPFIRE Association (to May 31, 1998); and
- Strategic Support through ZimTrust to CAMPFIRE (to January 31, 1999).

The Netherlands program focuses on field activities in the South East Lowveld and Mid-Zambezi region. Support for the CA is targeted at: (1) restructuring the association to facilitate broader representation; (2) revision of the constitution to permit membership by producer communities (the Dutch do not consider RDCs to be producer communities); (3) support for the establishment of sub-regional sections; (4) revision of the relationship of the CA to the CCG; (5) facilitation of a clearer job description for the executive director; (6) staff increases and training; and (7) facilitation of the preparation of a proposal for improved organizational/institutional relationships.

The support to the ZimTrust furthers: (1) assessment, planning, and implementation of village-level natural resource management and poverty alleviation activities; (2) a strengthening of the RDCs ability to carry out their Appropriate Authority responsibilities; (3) promotion of NGO and GOZ agency involvement in CAMPFIRE; and (4) promotion of international communication and exchange concerning CBNRM.

A Dutch program evaluation was carried out concurrently with the NRMP II evaluation. The evaluation concluded that the partnership between CA and the NGOs in the CCG was well-founded

and merited continued strengthening. At the same time, it expressed concern over the recent emergence of tensions as the CA exerts its independence from its partner CCG institutions.

CAMPFIRE is receiving modest support from other sources as well. ART receives funding from the European Union for its Brussels office. Norway supported the CAMPFIRE Coordinating Unit in the DNPWLM and appears to be continuing its assistance to WWF's SUPCAMP project. The Japanese also help support the CA. The US Fish and Wildlife Service (USFWS) and Safari Club International (SCI) contribute to implementing and improving the quota-setting program in CAMPFIRE areas.

Other Support. Other support is directed to the district level. For example, some districts have SAFIRE advisors working in the forestry sector who assist with wildlife and natural resource management, including CAMPFIRE. The District Environmental Action Plan process has targeted some eight pilot districts and introduces a participatory land-use planning approach to the RDCs by starting in the villages and wards. Of note is the World Bank's RDC Capacity Building program, which assists RDCs to improve their capabilities in administration, financial management, and planning. A district-level poverty alleviation program is just getting underway in 25 districts, many of which are coincident with CAMPFIRE. The Bank's support for social works may reduce the incentives for CAMPFIRE communities to use their revenues for social infrastructure investments.

A number of funding mechanisms are being considered or set up to support small environmental and natural resource activities at the local level, in much the same way that the CDF might be expected to operate in its infrastructural grants program. A small grants program to improve woodland management is being administered by a coalition of environmental NGOs, including SAFIRE. An Africa 2000 Global Environment Facility Small Projects Program is now in place, while a UNDP-sponsored National Anti-desertification Fund is under consideration. These initiatives merit close monitoring by CAMPFIRE in view of the potential synergies and complementarities that may be achieved over time.

3. The Greater CAMPFIRE Movement and NRMP II

Considerable confusion has developed both within Zimbabwe and among interested outside observers over the distinction between CAMPFIRE, the greater CAMPFIRE movement and the current USAID-funded NRMP II project. The scope of work for this evaluation (section C.1.b) calls for the team to describe the fundamental distinction between the greater CAMPFIRE movement and NRMP II assistance to CAMPFIRE and to characterize the major implications of that distinction for ongoing CAMPFIRE and project implementation and achievements. This section draws this distinction and lays the foundation for the many detailed implications that follow throughout the report.

Within Zimbabwe and, to a lesser extent, outside the country, CAMPFIRE has come to represent a philosophical orientation toward the use of wildlife that combines sustainable development and sustainable management of natural resources. Within Zimbabwe CAMPFIRE has become highly visible, as noted by Murphree, "CAMPFIRE was hailed as a leap forward in rural development and the CAMPFIRE Programme received the ultimate approbation when, in the lead-up to the 1990

General Elections, the manifesto of the ZANU-PF ruling party stated that CAMPFIRE had been a party innovation." (Murphree, 1997:14) Such political credibility underscores the growing importance and attractiveness of CAMPFIRE as a popular social phenomenon. Typically, CAMPFIRE figures in two or three local newspaper articles each week. CAMPFIRE concepts continue to evolve in accordance with the socio-political realities of Zimbabwe. Although CAMPFIRE's roots and greatest achievements are found within consumptive and sustainable management of wildlife resources, that is only one manifestation of a more general movement toward community-based natural resource management (CBNRM) and empowerment through more localized control of all indigenous resources.

Discussion of the CAMPFIRE movement must begin with a commonly agreed upon set of hypotheses and principles, as outlined in the following text box.

Box 2. CAMPFIRE PRINCIPLES

As long as wildlife remains the exclusive property of the State, no one will invest in it as a resource, and therefore its long-term sustainability is in doubt. This is particularly true of wildlife found within common or open access areas – like communal areas.

The concept of the 'opens commons' must be replaced by effective control/custody of a geographically defined resource territory by the resident communities whose own well-being is most dependent on the long term sustainability of this resource. The unit of proprietorship should be as close as possible to the unit of production, management, and benefit.

Secure tenure and decentralized management over natural resources through economic empowerment of local communities or producer communities to control of benefits and management are essential. The unit of proprietorship should be as small as practicable, within ecological and socio-political constraints.

Creation of economic incentives are essential to make wildlife a competitive form of land use where this makes ecological and economic sense. Economic benefits derived directly from the management control over (renewable) natural resources and commercialization by those most closely associated with this resource will lead to sustainable use and conservation. Benefits must be sufficiently large to elicit the requisite sustainable management response.

It is when local communities themselves experience the tangible economic benefits of local natural resources that they most appreciate their value to their own livelihoods, and who will accordingly make the efforts, sacrifices, initiatives needed to protect (manage) these for their own long term benefits.

Compiled from various CAMPFIRE background documents

a. Genesis of the CAMPFIRE Movement

CAMPFIRE began as an entirely Zimbabwean initiative, responding to a unique set of historical conditions. It was originally conceived of by a Zimbabwean government agency, and not by a local NGO or an international aid program. Murphree (1997) described some of the unique circumstances that led to its conception:

- The existing tenure system is an out-growth of a colonial context in which long-established populations lost not only their traditional rights over land territories, but also rights to the land they were eventually "given" – called the "communal areas." These are outside the most viable arable areas found within the center to eastern borders of the country (cf. Map 2).

- Communal lands remain, by law, unalienated State lands. The State owns all the resources of these lands as well – including all commercially valuable species of flora and fauna. Neither individuals nor groups can hold ownership over either lands or resources in these areas. By 1975, 58% of the land was State-owned (41% communal areas and 17% other State such as national parks.), while 42% was commercial and alienated (private freeholds).

The conceptual roots of what would later lead to CAMPFIRE, developed in the early 1960s in the wildlife sector. At that time the DNPWLM realized that its policing tactics to protect wildlife and the damage being done by wildlife were alienating people and that the Department was fighting a losing battle both inside and outside the National Parks (which are located in the arid and semi-arid regions of Zimbabwe found along all the borders of the country). It also realized that wildlife *management* appeared, economically and ecologically, to be the best land use strategy for the National Parks and their environs. The DNPWLM's response was to initiate practices that moved away from the traditional protectionist philosophy to one of conservation through sustainable use. The policy recognized that people's primary concern is their own survival, not wildlife management or conservation, and that unless wildlife contributes to their survival, they will not attempt to manage it: "the ability to earn direct economic benefit from wildlife would provide a more effective incentive for wildlife conservation." The government "will allow economic processes to determine the outcome of competition." In short, the principles of CAMPFIRE are based on economics.

The culmination of this new thinking was the 1975 Parks and Wild Life Act. This Act permitted owners of alienated land (largely white residents) a form of proprietorship over the wildlife on their ranches and farms. To do so, it established a transfer mechanism know as *Appropriate Authority*, which gave these owners legal rights to own, manage, and buy and sell animals as they wished. The result was that wildlife populations dramatically increased, and the wildlife industry boomed in Zimbabwe. These benefits did not extend to communal land populations, however, as they were excluded from the Act.

The land redistribution that followed Zimbabwe's independence in 1980 decreased commercial areas to 37% (a trend that continues under strong political imperative and population pressures). In 1982, the government tried to extend some of the benefits of the 1975 Act to communal land residents by

allowing Rural Districts, composed of elected representatives of the constituent ward and village councils that comprise each District, to get Appropriate Authority ownership and control over the management of their wildlife. The Government chose to retain the policy of vesting land rights in "communal lands," fearing that "individualization of common land holdings, extended to common pool resources, would result in fragmentation of management to levels where any possible benefits would be negated." Thus, initially CAMPFIRE was based on the concept that communal property constituted at the Rural Districts level was the appropriate entity for initiating a new approach to *wildlife* management.

At first, the RDCs were not supportive. They told the National Parks that "if [they] really want to help us, shoot the wildlife and we can get on with our farming." Given this assessment, and after observing the failure of a parastatal to launch the process that would lead to Appropriate Authority for RDCs, in 1987 the DNPWLM decided to take the lead in promoting its new program, CAMPFIRE. Prior to 1987, there was no CCG or CAMPFIRE, much less a "CAMPFIRE movement." The DNPWLM's earliest perspectives for CAMPFIRE were that "resident communities (Natural Resource Cooperatives), through group cooperative ownership, would have territorial rights over defined tracts of land called Communal Resource Areas within the Communal lands." (Martin, 1984:164) In that year the DNPWLM asked three existing organizations, CASS, ZimTrust, and WWF if they would be willing to work cooperatively to push the Programme forward. They agreed, thus beginning the first CAMPFIRE partnerships.

b. CAMPFIRE Operations

As a program, CAMPFIRE operates through committee structures at the village, ward, and district levels. In 1988, amendments to the District Council and Rural District Council Acts conferred the rights to the land and their resources to the RDCs – although these "rights" vary from district to district. The RDCs, which are headed by elected political officials, are in turn made up of Ward Development Committees (WADCOs), which are made up of Village Development Committees (VIDCOs). The Ministry of Local Government, which dictated these WADCOs and VIDCOs administrative structures, "often did not follow traditionally established boundaries of territory and membership" which has meant in practical terms that the formal structures at the local level have not provided may or may not be operational or easily accepted by the communities. If delegated to them by the RDCs, potentially the WADCOs and VIDCOs could have legal rights to ownership or exploitation of land and resources. However, the RDCs, because of wildlife's mobility, increasing financial needs and the government's inability to provide social and other services (such as clinics, schools, and road maintenance), have generally attempted to acquire and retain control many of the financial gains from district-level NRM activities. In addition, politically chosen WADCO and VIDCO representatives are not fully accepted at the local level, conflicts with traditional authorities and management units are very real. There is some reconsideration of village and local level governance that follows from a recently commissioned land tenure study and policy review which could lead to changes in the way CAMPFIRE is implemented, especially at the sub-district levels.

CAMPFIRE follows the government's existing committee structures by establishing "CAMPFIRE" committees corresponding to each. These CAMPFIRE wildlife or natural resource committees are supported by a CAMPFIRE coordinator, executive staff, and district-level technicians. At the national level, CAMPFIRE communities have formed an association (the CA) and receive governmental and non-governmental organizational assistance through the CCG. These organizations and the institutional dynamics between them are what constitutes the core of the Programme.

The DNPWLM, CASS, and WWF proved successful partners in developing and applying the early CAMPFIRE principles. The first test case was in the wildlife rich Nyaminyami District and Mahenye Ward in Chipinge District (see Map 2). In 1989, the Guruve and Nyaminyami Districts received Appropriate Authority and immediately began receiving 1988 hunting revenues. The award of Appropriate Authority came with a recommendation that the RDCs keep 15% of the revenue as a tax levy and up to 35% to cover the costs of district wildlife management, such as the costs of quota-setting, wildlife monitoring, and problem animal control, and distribute not less than 50% to producer communities (through the wards). Failure to do so could lead to withdrawal of Appropriate Authority. As the Programme became established, however, the Department changed its guidelines to suggest that Councils retain 20% of revenues and distribute 80% to the producer communities. More recently, the GOZ has discouraged any "interference" in what the RDCs determine is an appropriate revenue-sharing formula.

Conceptually, CAMPFIRE includes "all natural resources, but its focus has been wildlife management in communal areas, particularly those adjacent to National Parks, where people and animals compete for scarce resources." (Murphree 1995) One reason for the focus on wildlife is the dramatic success of the earliest activities in the late 1980s, when CAMPFIRE became associated with "wildlife revenue" for districts and producer communities, the image the larger public still has, even though other "indigenous resources" are now gaining attention. This focus also emerged because wildlife promised to bring the quickest injection of financial benefit. Within the wildlife sector, "game management is a form of agriculture." According to the Zimbabwean wildlife policy of 1989, "wildlife is a resource capable of complementing domestic livestock." As one proponent told the evaluation team, to be sustainable, "wildlife must ultimately pay for itself."

c. USAID and the CAMPFIRE Programme

A major contributor to CAMPFIRE's success has been the substantial capacity-building support provided over the past 10 years. USAID has played an important part in this effort. Its first involvement in CAMPFIRE occurred through NRMP I from 1989 to 1994, working with three local institutional partners, the DNPWLM, CASS, and ZimTrust. NRMP I provided capacity-building support to four Rural Districts in wildlife-rich areas in Matabeleland -- Binga, Tsholotsho, Bulilimamangwe, and Hwange. This pilot effort enabled a broader application of CAMPFIRE principles first tested in Nyaminyami and Guruve. Total funding for Phase I was US$7.6 million. Based on the promising results achieved through this pilot effort, USAID greatly expanded its assistance under NRMP II, beginning in September 1994, adding $20.5 million, including $16 million in bilateral funds.

As other Rural Districts became aware of what was happening in Nyaminyami and Guruve the number of CCG members increased dramatically, as can be seen from the following numbers:

1988 - 2 RDCs with Appropriate Authority
1989 - 9 RDCs (beginning of NRMP I)
1991 - 12 RDCs
1995 - 26 RDCs (beginning of NRMP II)
1996 - 29 RDC
1998 - 36 RDCs.

Three phenomena explain the dramatic growth in the number of participating RDCs (full and associate members of the CAMPFIRE Association):

(1) At first local communities had been suspicious of the National Parks and Rural Districts. They were mainly interested in knowing when the Programme would be withdrawn because historically, the National Parks had not acted generously toward local populations (e.g. expropriation of tribal lands to establish parks, sanctions against traditional hunting.) . This skepticism was also a major reason why people wanted the initial dividends to be in the form of cash "in their pockets." This way the RDCs could not come back a few months later and say they had "made a mistake" and wanted the money back. Soon, however, the local communities saw that they were actually **getting** significant amounts of money and that CAMPFIRE really meant the "devolution in the ownership of wildlife revenues from central government to RDCs." At that point they became eager to protect and manage the resource newly placed into their hands. In short, there was latent popular support for RDC involvement.

(2) A substantial wildlife industry **already existed** that created a demand for the CAMPFIRE "product." What was needed was to help communities participate in this revenue stream -- a radical new concept for Zimbabwe.

(3) Enabling opportunities to build a program were facilitated by the entry foreign donors and the organizations they supported. USAID provided very significant funding support through NRMP I and II, particularly for capacity-building and training (e.g., for the Rural Districts and communities to organize for managing their natural resources, including wildlife). These funds also made obtaining new or updated infrastructure, vehicles, computers, supplies a possibility. Funds have also been available for salaries of key personnel. The support provided has included advice to RDCs on "getting the best deal" when working with the commercial sector, including on topics such as designing a tender and what to include in a contract. This support linked the demand referred to above with an expanded capability to manage wildlife and other natural resources. In NRMP II, this support has been critical in enabling even districts without significant wildlife resources to join the CA and begin to operationalize the Programme in their respective districts. CAMPFIRE has always encouraged expansion of activities to natural resources other than the consumptive use of wildlife. In short, the USAID-supported NRMP I and II have been mostly responsible for enabling the widespread capacity-building and

strengthening of local communities to manage their resources and benefits in a sustainable manner.

d. CAMPFIRE Ambiguities and NRMP II

CAMPFIRE is an extremely complex program, characterized by creative tensions that NRMP II has highlighted. These have produced some unexpected, often unintended consequences and ambiguities. Considered in the broader contexts of Zimbabwean society and international arena, the CAMPFIRE movement cannot be expected to have followed a smooth and predictable path. Social movements, by their very nature, tend to represent organized, sustained, self-conscious challenges to existing authorities on behalf of constituencies whose goals are not effectively taken into account by these authorities. CAMPFIRE is certainly no exception. The key actors behind its rapid development and the organizations they represent have mobilized considerable activity behind the Programme and its guiding principles. (The importance of these key figures is considered subsequently in section B.3 of this chapter.) Support within Zimbabwe is now widespread and occurs in at least three forms: ideological, material, and direct participation. The resulting dynamism is, for the most part, positive and engaging to the movement's adherents. The variety of levels and the unevenness of the CAMPFIRE's progression do call for explicitness and periodic adjustment. At the time of this evaluation, a number of ambiguities struck the team as important and possibly requiring the attention of NRMP II's management. These include: 1) ownership of CAMPFIRE; 2) scope and nature of CAMPFIRE; 3) confusion over roles and responsibilities under CAMPFIRE; and finally, 4) the interrelations between CAMPFIRE movement organizations and those outside of or on its periphery.

The ownership question relates to who actually is part of CAMPFIRE. As a movement within Zimbabwe, CAMPFIRE has become larger than its core program components. In addition to the CAMPFIRE Programme itself, the CAMPFIRE movement includes elements of educational, political, and environmental groups outside the current CCG that believe in the CAMPFIRE principles but that are not directly associated with the Programme or the CA. The CCG members consider the sum total of all individuals and institutions, both within Zimbabwe and in other countries, that adopt CAMPFIRE principles and that are dedicated to promoting them through their own particular means and interests as being associated with a more general CBNRM movement that is linked to, but not directly a part of, CAMPFIRE. There is also an international CAMPFIRE "community" that is directly linked to CAMPFIRE but is not actually a part of the Programme. Yet through development actions NRMP II (USAID SO1) itself is just one project, albeit a major one, within the CAMPFIRE Programme

Another ambiguity surrounds the nature and scope of CAMPFIRE. There is broad agreement that CAMPFIRE is more than just wildlife, yet wildlife revenues drive the program, Within Zimbabwe, different actors see the boundaries of CAMPFIRE in different ways. The FC, for instance, thinks of CAMPFIRE in terms of geography -- the specific communities engaged in wildlife management. The FC has and plans comparable social forestry activities within and outside of current CAMPFIRE areas. They only considers an activity to be "CAMPFIRE" if the activities take place in existing CAMPFIRE wildlife-rich areas. This point is important because the FC has proposed to take a role

of direct contribution to the program. Other CCG members, in contrast, consider all CBNRM as an expression of CAMPFIRE principles. The important distinction here is that the forestry people cannot disassociate CAMPFIRE as a concept from the idea of RDCs having control of the Programme and taking a major portion of the revenue gained by such activities. When the CA lobbies on behalf of mining revenues and royalties for RDCs, it does so in the name of CAMPFIRE. For some detractors, CAMPFIRE is no more than an organized effort to subsidize the sport hunting industry.

A third source of ambiguity revolves around the roles of different parties. For example, some CCG NGOs believe that when RDCs make decisions, they do not represent the CAMPFIRE communities. The RDCs (including the CA that represents them), in contrast, believe that "we are the community" and "we are villagers ourselves." One CA Board Member commented, "I am an indigenous resource," and therefore how can anyone say that "local communities" are not sufficiently represented? (Issues of devolution of authority are discussed in more detail in section IV.A.) The ambiguity extends to USAID. Some CCG members and potential outside CCG partners look at the administrative complexity and what some see as excessive hands-on involvement by the USAID SO 1 team and conclude that USAID is dominating the CAMPFIRE Programme. Because NRMP II has been providing the bulk of the financial assistance to what is called the CAMPFIRE Programme during the past few years, some may see the two as synonymous. The Programmeis, however, distinct from the support USAID gives it through NRMP II. Other factors similarly may blur the distinction. For instance, initially the NRMP II PET was designed as a program component to enable USAID to deal directly through a single mechanism with all CCG grantees to program its funding. It is now evolving into the CAMPFIRE body that evaluates and coordinates program activities with CA partner institutions. However, according to one CCG member, there is a "need for any institution that subscribes to CAMPFIRE principles to consider itself, and be considered by others, as part of the CAMPFIRE program, notwithstanding the fact that it is not a NRMP II grantee."

Frequently there is pressure to accelerate sound implementation, and NRMP II attempts substantial resource transfers to the district level in relatively short periods of time. At the field level, however, sometimes the perception is that the project agenda is to spend quickly, on occasion at the expense of quality, relevance, and sustainability. This apparent ambiguity of purpose has been accentuated by the CA's effort, on the one hand, to determine priority districts and priority activities for each district and, on the other, its political motivation to disperse CDF grant funds equitably across its RDC constituency. Wider coverage across the country's communal areas has helped to establish the CA as CAMPFIRE's lead agency. However, the resulting levels and expectations with regard to staffing, training, meeting schedules, travel, and the like may be hard for the CCG partners and local participating institutions to sustain once such major aid departs. (Such concerns are reflected in the USAID graduation scenarios discussed in Section V.)

Ambiguity exists at the interface between CAMPFIRE and other local government structures that are not directly involved with the program. Priorities and interests vary at the different levels -- national, district, ward, and village -- and all concerned parties -- the Government, RDCs, WADCOs, VIDCOs, traditional authorities, communities, and NGOs, including the CA --manage the interface

around strategies at these levels poorly. For example, "The steady withdrawal of central government grants to RDCs has produced a growing need for Councils to generate their own income. This gives Councils one set of development priorities." Traditional authorities want to increase their own power base, and they therefore have another set of priorities. Communities and individuals are concerned with their own economic survival, creating yet another set of priorities. "Rarely do these priorities and interests all coincide." (Zimbabwe Working Group: 1996:9). For this reason, it appears difficult for the CA to claim it represents the villages and wards, as well as the interests of the RDCs, while at the same time claiming to be politically aligned with national policies. The FC's concerns over the definition of the beneficiary community are relevant here as well. It believes that some branches of the government administration consider their forest-sharing arrangements, in their words, as bordering on "subversive." (NRMP II institutional support grants cut across the ambiguities in these structures of governance, an issue that is addressed further in the section on the CDF [III.B.1.b] and elsewhere.)

That NRMP II support to CAMPFIRE has been successful is attributable to the skills of the USAID core team, institutional partners, and CCG members in steering a constructive course through this complexity. (The ambiguities surrounding both programs and project coordinating structures are addressed in more detail in section III.B.3.)

III. NRMP II PERFORMANCE AND IMPACT

This section reviews the results achieved under NRMP II. By extension, it inevitably reviews and makes judgements on CAMPFIRE overall, as only in this way can the USAID effort be seen in perspective. This substantial chapter is subdivided into two major sections. The first deals with general concerns including the CAMPFIRE's scope, the responsiveness of USAID to the previous evaluation, which called for USAID support to match the Programme's scope, and finally the allocation and programming of CAMPFIRE revenues. The second part treats specific NRMP II and CAMPFIRE implementation issues. Performance reviews of most of the implementing partners are integrated in this chapter because the workplans of each agency are so closely integrated with specific substantive areas of intervention. The analysis identifies a number of outstanding development questions, which are covered in Chapter IV.

A. General Concerns

1. USAID Responsiveness to the NRMP I Mid-Term Evaluation

Between the 1994 NRMP I Mid-Term Evaluation and the period when NRMP II got underway in earnest, the CAMPFIRE Programme was somewhat adrift and rife with uncertainty concerning its future growth and funding. In general, the USAID Mission, with the exception of one PSC, was neither focused on CAMPFIRE nor on the natural resources sector. Although from a management standpoint NRMP I had shifted to the bilateral portfolio, it was still not well integrated with the Mission's strategy at the time. During this transitional period, USAID resorted to transitional "bridging" grants to maintain some continuity of NRMP and, hence, CCG activities.

To its credit, the USAID management team convened a series of consultative workshops to examine environmental and natural resource problem areas. The resulting analysis helped to establish a new strategic focus for the USAID natural resources program in Zimbabwe and define an operating strategy for NRMP II that substantially addressed the concerns raised in the mid-term evaluation report. Indeed, the workshop that sent the second phase into full operation responded well to many of the evaluation recommendations. Likewise, the Phase II design and implementation are responsive to the recommendations: a scale-up to a national-level program; expansion in the number and competencies of implementing partners; shift in management from a regional to bilateral focus; assignment of real powers to coordinate, approve, and allocate work to the project implementing committee (now the PET); and reinforcement of the CA as lead agency.

The ULG mid-term evaluation also stressed the need to devolve CAMPFIRE activities further below the Rural District level and to diversify the sources of natural resource revenues beyond wildlife. It recommended taking these steps within a demand-driven mode of operation and including technically and environmentally viable infrastructure in response to local needs. The project structure reflects these concerns, as the review of the implementation record under NRMP II throughout this document shows.

The NRMP I evaluation also called upon USAID to accomplish these changes in a less "heavy-handed" manner. This recommendation may have been unrealistic. USAID was, in effect, caught between the central government, which wanted more control, and an expanded group of autonomous-minded and mostly NGO collaborators with only a limited history of working together. With NRMP II, USAID also faced the task of reinforcing a heterogeneous group of actors -- the RDCs and subdistrict institutions and their representatives for natural resources, the WADCOs and VIDCOs, the Board, and the Executive Director of the CA -- that occupied the middle ground in a model of decentralization. Finally, during much of its second phase the project was under heavy scrutiny and faced a threat of shutdown. Only now is USAID in a position to back off and explore new implementation options. The evaluation team's recommendations are tailored to assist NRMP II to wind down gradually and to move in concert with other Mission programs toward orderly closeout and longer term sustainability.

2. Current Scope of CAMPFIRE

Despite its expansion to a national-level focus, CAMPFIRE continues to concentrate on the communal areas in Zimbabwe's Natural Regions IV and V, where the agricultural potential is limited and poverty is widespread. CAMPFIRE is currently active in 36 of Zimbabwe's 57 Rural Districts. Its wildlife revenue base remains concentrated, as noted, in 12-13 Rural Districts with high potential, although its geographic expansion, as can be seen in the accompanying maps, continues. The Programme has expanded from its origins in Guruve and Nyaminyami Rural Districts to include large expanses of the Mid and Lower Zambezi, Southeast Lowveld, Matabeleland, and Eastern Highland regions. Over the two phases of USAID's involvement, the number of local communities participating in CAMPFIRE has increased to a total of more than 185 wards. This translates into more than 200,000 households and several million people.

As stressed in this document, commercially exploitable wildlife populations exist in only about 13 Rural Districts. Thus, as the Programmehas expanded, the working definition of its targeted geographic coverage has changed to reflect the efforts to diversify beyond wildlife into forest and veld products, fisheries, and general ecotourism:

> *Under NRMP II, all collaborative project partners shall service the membership of the CAMPFIRE Association... having Appropriate Authority status, with special emphasis on areas with commercial viability.* (CCG-USAID 1995:6)

With diversification, the CAMPFIRE implementors are now servicing districts both with and without Appropriate Authority status, although, as a matter of practice, most Rural Districts are obtaining Appropriate Authority and moving into full membership in the CA. The shift to the national level has thus given impetus to CAMPFIRE to diversify to non-consumptive wildlife uses, to examine other resource policies governing land access, forest ownership and use, and to move NRMP II to a strategy of heavy investment in institution-building of representative natural resource committees and of RDC capacity to serve this constituency. The decision to go national does not necessarily imply, however, that all communal areas should be included. A more successful avenue to building up to

national coverage might have been to find successful, replicable characteristics of ongoing or new interventions. These could then be developed as several CAMPFIRE "models," to be used in a search for areas with similar characteristics in which the one or another model might be replicated.

Expanding the geographic focus is not without consequences and risks. Spreading CAMPFIRE support under NRMP II, as explained in detail elsewhere in the report, produces high expectations for benefits from wildlife and other resources, dilutes the energies and capacities of the CCG actors, and puts pressure on the Programme to engage new institutional partners and develop new revenue streams. Efforts to meet these challenges have stretched the project coordination structures and sometimes seem to be burying the program's underlying rationale in a plethora of process and planning activities. The team's recommendations aim to ease these capacity constraints by extending capacity-building activities over a longer timeframe.

3. Current General Financial Situation and Trends

Although NRMP II does not directly support trophy hunting in Zimbabwe, it supports development efforts that help local communities capture and make better use of the substantial revenues the safari hunting industry generates, and the Programme itself also captures a portion of these resources. Revenue distribution and use are primary measures of how well the CAMPFIRE principles are being applied, and they will continue to grow in importance as new resources are developed. The revenue is used variously for compensation for animal damage to crops, for social infrastructure, for group enterprises such as grinding mills, and for individual households in the form of cash dividends. Since the generation and distribution of this income goes to the heart of CAMPFIRE, the team spent considerable effort to assess the use of the revenues generated by sustainable resource activities.

Evaluation Issue: Campfire Revenue and Its Distribution to Wards and Councils. *"Describe CAMPFIRE's current general financial situation and trends, including the Programme's primary sources of income. Describe CAMPFIRE's general revenue distribution system, including proportional allocations to the various participants. Discuss the appropriateness of CAMPFIRE's current revenue distribution system, with emphasis on the proportional amounts of Programme revenues accruing to revenues accruing to each participant. How are they commonly used? Discuss any alternatives for optimizing the use of these funds in the achievement of CAMPFIRE's community development objectives."*

Findings

As WWF and CA data show (see Tables 3-10), some 93% of CAMPFIRE revenue is derived from contracts the RDCs sign with safari operators. These safari operators pay the RDCs a fee to bring in clients to shoot a game animal on District lands, usually in areas bordering the National Parks. The DNPWLM determines or agrees to the quotas for the number of animals that may be hunted. According to CAMPFIRE principles, part of this revenue is distributed to residents in the ward where the animal was shot, and in principle, the residents of these "producer wards" are free to use this money in any way they choose. Most have a ward committee to manage the quota-setting and

administration of revenues.

In the Rural Districts well-endowed with wildlife resources, CAMPFIRE revenue is often significant. Since CAMPFIRE began, the total revenue accruing to all Districts rose from an initial $655,000 in 1989 to $1,253,405 in 1996. Over the eight years for which data are available, the CAMPFIRE Districts have earned a cumulative total of US$8.1 million. Three Districts -- Binga, Nyaminyami, and Guruve (all in the Zambezi valley) -- have each generated totals of over US$1 million in the period since 1989, and their earnings dominate the CAMPFIRE revenue reports. Since the beginning of NRMP II in 1994, the CAMPFIRE Rural Districts have earned a total of US$4.8 million, slightly more than half of the US$8.5 million of NRMP II funds expended to date.

Distribution of revenues to producer communities is a key principle of CAMPFIRE; without it, there is no compelling reason to manage natural resources sustainably. The economic stake in their wildlife resources is what leads villagers to set aside land they might otherwise use for agriculture, whether suitable or not, and to take other measures to protect wildlife. Typical measures include reporting local and professional poachers, ceasing poaching to procure family "meat," and cutting back on requests to the Parks Department to kill "problem" animals that raid corn fields in remote areas. Instead, local communities will segregate their cattle from the wildlife to improve the "hunting experience."

There are three categories of revenue use. One is the District tax or levy, which goes to the general budget of the Rural District and whose use is independent of CAMPFIRE's specific needs. Often it is calculated on a sum that already includes a 2% levy paid to the CA. Second is program management, which may be the 35% mentioned above; however, these funds may come from the revenue the RDCs transfer to the wards, which then administer them. The third category is discretionary funds for community and/or household use.

Revenue is dependent on the state of the hunting safari market. Light management assistance is provided by CCG members, who advise the RDCs about the market, contracting trends, best practices in quota-setting, and management of the wildlife resource for quality so that the price of hunting safaris in the Rural Districts rises. At present, many of the Rural Districts deriving safari revenue do not attract premium prices because the presence of dogs and cattle, fields planted ill-advisedly in areas reserved for hunting, and degraded landscapes detract from the quality of the hunting experience. In Chipinge District, for example, Mahenye ward operators complain that the game is depleted by drought, trophy quality animals are scarce, and/or human settlements reduce the quality of the hunt.

The number of Rural Districts that have significant wildlife resources or border National Parks and National Safari Areas is not great, as mentioned. After nine years of implementation, just 9 of the 36 current Rural Districts that are CA members appear to have the potential to earn over US$50,000 a year from this activity. This amount is certainly enough to pay for a skeleton staff of resource monitors and, perhaps, a CAMPFIRE coordinator, should such staff be needed. However, the potential to expand this part of the Programme is limited.

Photo safaris can be significant in at least 13 of the wildlife-rich Rural Districts. A case in point is the nature reserve near Bumi Hills, where Sun Hotel has exclusive rights to viewing and where elephant, antelope, buffalo, and zebra come within a stone's throw of the hillside resort looking down on Lake Kariba. Other destinations in southern Africa and Zimbabwe's own National Park system pose fierce competition. However, the private game ranches and the nature preserves themselves possess their own unique charms and attractions. Others benefit from proximity to the competition.

The richest CAMPFIRE Rural Districts have an uneven track record of distributing benefits to producer communities. In 1996, Nyaminyami District Council, Zimbabwe's top earner ($443,095 in CAMPFIRE revenue in 1996) distributed only 18% of that total to producer communities in 1996. In fact, in only two of the eight years for which data are available did this District distribute more than 50% of the revenue. The track record of second-place Guruve District Council -- it earned $299,415 in 1996 (see Table 8) -- is better: it has distributed over 70% of its revenues in the past few years.

Box 3. CAMPFIRE Revenue

Efforts to extend CAMPFIRE revenue to other natural resources, although an "early" concept, has only recently resurfaced as a significant issue. However, most RDCs are still operating using the historic definition and so restrict themselves to "wildlife." Scope for widening this definition will be determined politically, as is currently being discussed in relationship to minerals, such as gold, diamonds, black granite, coal, nickel, chromite, asbestos, and emeralds. Mberengwe District only gets .0004% of the tax earned for its minerals - not to speak of anything for the wards in which these are found. (Owen and Maponga, 1996)

On average, the Rural Districts have followed the first revenue distribution rule (50/35/15), rather than the more empowering 80/20 guideline that allows wards to budget for and administer resource management costs. Since the Programme began, 58% of revenue has devolved to the producer wards, with the Councils retaining an average of 25% for management fees and 15% as a District levy. At the same time, these average statistics disguise significant variations across the Rural Districts. Again, it is important to note that management revenues are also spent at the ward and village levels, so that the actual producer communities do receive at least indirect benefits.

As Table 11 shows, *average* household benefits rose to Z$92 (US$9.20) in 1996. This increase is, however, far from the norm and really reflects the expansion of the hunting niche in the top four wildlife districts. The median benefit was only $Z45 (about $US9), an amount not much different from what it was in 1989. However, because the payment was in hard currency, it has been inflation-proof. Generally, this amount compares to an equivalent of about a 1-2 month supply of maize per household. Many participating households fall well below even these averages. Material benefits on a per household basis are lower, a pattern that fits the tendency to implement shared investment strategies. On a more positive note, the number of households, villages, and wards receiving any benefits continues to increase.

This practice of the RDCs' legally retaining more than the recommended share of the revenue would not be so serious if the benefits per household in the producer wards were already exceptionally high. Unfortunately, most of the data indicate that, while individual household benefits fluctuate greatly,

the value of the benefit per household is frequently marginal, and only in the wealthiest wildlife Rural Districts is the benefit enough to make a significant difference. Along with the recognition that wildlife is fundamentally a communal resource, this is an important reason that local communities, when given the choice, actually voted to aggregate their funds so that they could collectively undertake programs they considered important to all of them -- such as a rural health clinic, water pumps, cattle dip pens, or a primary school building. The Rural Districts have often chipped in a portion of their share of the dividends to make these projects possible.

As the wildlife niche is filled, the figures in those districts will continue the plateauing trend of the past several years. Increases will instead come from quality management of the wildlife resource and foreign exchange gains, rather than from greater numbers of animals shot. Where CAMPFIRE succeeds, as it does in those districts, a participating household can earn as much as Z$5,506 (US$550) in benefits distributed to them by the ward committees. However, this does not actually occur, as the concerned districts question whether individual distributions of such large amounts of cash revenue will yield optimal developmental results.

Key factors shifting individual households away from direct cash benefits from wildlife resource are:

- RDC distribution of less than the recommended 50-80% of revenues by the RDCs to the ward communities.

- How communities receive and use their wildlife dividends varies greatly, even when they are given complete freedom to decide how to dispose of it. There is no obvious generalizable pattern or trend. The literature study and observations by the evaluation team indicate that most ward committees allocate a portion of the revenue to basic, standardized community projects such as grinding mills, the local school or clinic, cattle dip pens, or a borehole fund, and frequently allocate another portion for cash distribution to households. This allocation of large portions of ward-distributed revenue to social infrastructure projects means that less funds are available to distribute as cash to individual households. If a majority of the residents in an area freely choose those projects, nothing need be said about this practice. However, the evaluation team was also led to understand that some steering takes place. Numerous policy statements by MLGNH and Council officials expressing resistance to the idea of cash benefits for producer communities and favoring collective infrastructure projects support that finding. (Bond, 1996) While the long-term benefits of providing schools and clinics unquestionably have merit, the short-term benefits are also very important to people at the economic margin, who are also the most likely to hunt "illegally" for subsistence needs.

- Migrants moving into CAMPFIRE Rural Districts are allocated land, even in areas set aside for wildlife, and they are able to claim their share of revenues after a few years of residence. Research shows that there has been a 10% a year increase in population in the Zambezi valley from in-migration. This influx has caused habitat fragmentation and has deeply eroded the substantial gains made by the most significant CAMPFIRE wards, such as in Guruve, Binga, and Nyaminyami. (WWF, 1997 Land Use Study)

A final point is that a few RDCs have organized insurance funds to compensate farmers for the crop damage caused by wildlife. These attempts have foundered, however, primarily because of the difficulty of assessing crop damage in a timely manner and because of false or inflated claims of damage and requests for compensation by farmers. Still, these attempts to address the risk that farmers are facing in these wards are important, and continued support should be encouraged.

Conclusions

Unless communities in the Zambezi valley realize significant economic benefit from their wildlife resources, they may lose the incentive to retain habitats and manage wildlife resources in a sustainable manner -- and Zimbabwe will lose its most productive wildlife habitats for communal area residents. More information is needed to determine what people would judge as adequate to maintain their commitment and protect the habitat from human encroachment.

The well-endowed Rural Districts -- particularly Binga, Nyaminyami, and Guruve in the Zambezi valley -- that provide the bulk of CAMPFIRE revenues have given the Programme a false sense of profitability and drawn undue attention to its potential to provide rapid and substantial benefits to the majority of program participants. Great care must be exercised in tailoring the Programme to correspond to the revenue potential of a given area.

The Zambezi valley land-use study and other information about land allocation in CAMPFIRE districts indicate that they face erosion of the wildlife management gains achieved early in CAMPFIRE's history. There is a great need for problem-solving and participatory analysis of these situations to increase the quality of the wildlife resource and value of their safari operations. In lower revenue potential areas, a longer term perspective and strategy are needed. A more integrated approach to natural resource management, one that initially focuses on woodland management while gradually building up wildlife populations, should be considered. The potential and significance of all natural resources to household well-being should not be underestimated, but neither should the differences in requisite approaches that CAMPFIRE might avail itself of.

It is not evident, where communities have invested the revenue derived from wildlife activities in collective revenue-generating activities (such as small shops offering basic staples, beer halls, and grinding mills) that these activities are any more profitable than the private sector enterprises they occasionally displaced. Nor is it clear that these collective enterprises are generally well-managed and economically viable over a multi-year period. However, in most of these cases the motive is not profit, but rather the provision of an important service at a lower cost or more convenient location that benefits the poorest of the community.

Table 8: CAMPFIRE Revenue and % Distributed to Wards Below the Council (in US$)

District	1989 Income	%	1990 Income	%	1991 Income	%	1992 Income	%	1993 Income	%	1994 Income	%	1995 Income	%	1996 Income	%	TOTAL
Beitbridge	na.	na.	38,836	89	37,902	58	44,014	69	39,210	46	67,043	50	65,566	50	58,461	0	351,032
Binga	na.	na.	76,587	0	63,278	22	254,927	62	176,951	71	189,342	60	212,831	60	211,586	59	1,188,502
Bulilimamangwe	na.	na.	37,682	0	33,324	68	38,146	50	29,867	50	37,263	36	46,622	50	57,062	44	279,966
Chipinga (Gaza)	na.	na.	11,237	100	19,728	82	39,124	80	24,200	82	21,998	81	16,557	79	27,704	50	160,548
Chiredzi (Gaza)	na.	na.	na.	na.	77,846	0	64,490	17	84,850	28	129,729	63	141,022	78	131,011	78	628,948
Gokwe	na.	na.	na.	na.	114,429	53	97,738	41	81,801	47	na.	na.	na.	na.	na.	na.	212,167
Gokwe North	na.	na.	na.	na.	na.	na.	na.	na.	na.	na.	96,188	55	112,604	52	127,956	39	336,748
Gokwe South	na.	na.	na.	na.	na.	na.	na.	na.	na.	na.	7,385	87	3210	0	0	0	10,595
Guruve	198,770	46.9	209,356	38	138,154	30	140,074	51	294,631	55	314,950	78	305,956	73	299,415	0	1,702,536
Hurungwe	na.	na.	na.	na.	45,664	0	6,861	65	133,729	48	127,614	65	130,395	57	9,930	50	454,193
Hwange	na.	na.	21,036	?	?	?	?	?	25,581	33	63,805	51	112,495	55	72,549	50	274,430
Mudzi	na.	na.	na.	na.	na.	na.	na.	na.	na.	na.	3,410	?	?	?	4,418	8	7,828
Muzarabani	828	0	4,762	0	4,862	0	2,009	?	7,658	100	29,756	68	75,288	33	39,471	0	163,806
Nyaminymani	**150,213**	**62**	**155,462**	**26**	**152,769**	**35**	**162,612**	**59**	**390,537**	**44**	**458,128**	**44**	**279,838**	**44**	**443,095**	**18**	**2,042,441**
Rushinga	na.	na.	na.	na.	na.	na.	na.	na.	na.	na.	na.	na.	na.	na.	4,418	0	4,418
Tsholotsho	na.	na.	77,974	36	86,628	40	140,845	40	179,841	46	96,062	50	89,509	56	130,866	60	801,725
UMP	na.	na.	na.	na.	na.	na.	na.	na.	na.	na.	na.	na.	na.	na.	4,418	0	4,418
Total	**349,811**		**632,932**		**774,584**		**990,840**		**1,471,856**		**1,642,673**		**1,591,893**		**1,622,360**		**9,076,949**
											1,642,673		**1,591,893**		**1,622,360**		**4,856,926**
Total During NRMP II																	
MIN	828	0	4,762	0	4,862	0	2,009	17	7,658	28	3,410	36	3,210	0	0	0	4,418
MAX	198,770	62	209,356	100	152,769	82	254,927	80	390,537	100	458,128	87	305,956	79	433,095	78	2,042,441
AVERAGE	116,604	36	70,326	36	70,417	35	90,076	53	122,655	54	117,334	60	122,453	53	101,398	29	507,312

Source: WWF Programme Office-Harare
See text for discussion of weakness in the data
* as of March 21, 1998, not enough Ddistrict Councils had submitted to CAMPFIRE Association enough accurate 1997 income and benefit distribution dta to presente any resutls for that year.
na = not applicable as Council had not yet joined the CAMPFIRE Programme
? = data point uncertain or unavailable
Gokwe District divided into Gokwe South and North in 1994

TABLE 8A: NUMBER OF WARDS RECEIVING CAMPFIRE REVENUE, AVERAGE BENEFIT PER PARTICIPATING HOUSEHOLD

Year	Number of Wards	Average Ward Dividend	Households in Ward	Total Amount Devolved to Wards	Average benefit per household in Zim $	Median Benefit per Household in Zim $	Which Buys X kilos of grade d maize	Average Benefit per household in $US	Minimum HH Benefit in Zim $	Maximum Household Benefit in Zim $
1989	16	24,688	8280	395,005	48	41	n.a.	23	5.07	498
1990	31	19,655	22503	609,292	27	19	n.a.	11	1.39	651
1991	56	22,386	54542	1,298,363	24	22	n.a.	6	.69	744
1992	75	41,296	72775	3,097,214	43	30	6	9	1.85	2,303
1993	100	54,246	97257	5,424,584	56	37	9	9	.37	3,832
1994	102	68,859	92912	7,023,667	76	32	15	9	1.91	5,327
1995	115	71,845	101995	8,262,218	81	40	32	9	.93	4,388
1996	103	79,774	89475	8,216,717	92	45	43	9	1.96	5,506

Source: WWF Programme Office-Harare and grain Marketing Board, Zimbabwe

Notes: Maize price is marketing board's selling price of unmilled grade D maize, an amount thought capable of providing enough staple grain for a small family for 4-6 weeks. Population data is not updated over time to reflect substantial in-migration and splitting of households, hence average benefit may be somewhat overestimated. The fall in households in 1996 is due to some Districts still to report

n.a.= not available

Recommendations

The CA should commission CASS to review existing data and complementary field studies of what constitutes a sufficient benefit to encourage people to maintain their commitment to conservation (essentially this review would test assumption #3 of the project relating to a "willingness" to invest in conservation).

The CA, backed by the DNPWLM, should make increased CAMPFIRE revenue-sharing with producer communities a priority policy issue with member RDCs and with the government and publicly acknowledge those RDCs that adhere to desirable revenue distribution standards. This policy change may be reinforced by the imminent World Bank funding for 26 Rural Districts to support the kind of activities such dividends currently fund (health clinics, improved roads, primary schools, etc.).

RDCs should strengthen their commitments to facilitating procedures wherein user communities decide what to do with their wildlife revenue and in what form they receive it.

The CA should issue guidelines stating that its member councils should be as open and transparent with their wildlife accounts as possible. As part of that process, it will need to send the ward committees copies of contracts with safari operators and of all checks made out to the Council by operators under contract.

MLGNH program participation should be supported by assisting it in carrying out the annual audits required by law. The audits and public accounting should be posted in public places for general transparency.

CCG members interested in habitat preservation should concentrate their human resources, funds, and project activities in those districts where the possibilities for generating significant wildlife revenue are greatest.

Collective revenue-generating activities established with dividend funds should be compared with similar private sector operations to understand what the actual benefits are and whether they are likely to be sustainable.

B. Current CAMPFIRE and NRMP II Evaluation Issues

1. Building Local Capacity to Achieve Community Development Results

An important focus of NRMP II has been to develop the different types of knowledge and skills, with accompanying administrative and institutional structures, by rural communities and their local governments require to manage their natural resources effectively and sustainably. Included in this capacity-building has been "the development and transfer of the range of individual and institutional NRM skills needed to enable communities to manage their resources wisely, as well as an appropriate

incentive framework." (SO1 Document 1997) The discussion in this section focuses on key NRMP II initiatives to provide that support, with attention to their social and economic impacts. The discussion is organized into the following topics:

- The CA as the lead organization;
- Financial support for decentralization and the CDF;
- Issues relating to infrastructure development;
- Empowerment of local communities and the ZimTrust;
- Reaching communities through public education and Action; and
- The social and economic impact of NRMP II and CAMPFIRE activities.

Evaluation Issue: Establishing the CAMPFIRE Association as the Lead Organization. *"To what extent has NRMP II assisted the Association in assuming its leadership roles/responsibilities." "To what extent have collaborating agencies, as well as the GOZ, accepted the Associations's leadership." "To what extent is the Association's Secretariat responsive to the aims/objectives expressed by the Associations's Board of Management." "To what extent has the Association been successful in defining and fulfilling/meeting its roles/responsibilities to its increasing number of members ?" "Discuss the role and impact of the institutional contractor in these areas." (A.8)*

As noted, the CA serves as the lead agency in the implementation of the CAMPFIRE program. It exercises this responsibility through a program of advocacy, coordination, and information dissemination, both local and international. The CA has a Secretariat, much of whose agenda entails serving the interests and coordinating the activities of the other implementing partners, known collectively as the CAMPFIRE Collaborative Group. The CA is also responsible for chairing and coordinating the activities of the PET. (See Section B. III for a more detailed discussion of the CA's performance and related recommendations, and for an assessment of the PET.)

Box 4. CAMPFIRE Association Mission Statement

"We provide services to member RDCs to enable them to engage in sustainable natural resources management and development so they can improve life in rural areas through participatory rural development."

Source: CAMPFIRE Association, Strategic Plan, NRMP II, 1996-1999, p. 1

The CA constitution calls for a Board of Management, comprised of 14 members elected by the general membership. The Board makes policy, issues policy guidelines, approves annual budgets and workplans, and oversees staff employment. It enjoys direct linkages with government. The CA Executive Director is charged with implementing Board policy.

The CAMPFIRE Secretariat is headed by an Executive Director, who is supported by a Deputy Director for Finance and Administration and a Deputy Director for Projects. The Executive Director supervises the Harare office staff of 14, who include the two Deputy Directors, a Training and Institutions Development Officer, Monitoring Evaluation and Gender Officer, Projects Development Officer, Information and Public Relations Officer, and Finance and Administration Officer.

The CA has established five regional bodies to promote CAMPFIRE in Zimbabwe.

From 1991 to 1995, the primary source of support for the CA was the ZimTrust, using funds obtained from a variety of donors, particularly the Overseas Development Fund. In 1996, ZimTrust funding of the CA ended. NRMP II provided continued funding, beginning with a pre-award "bridge" grant of Z$4,081,056 for the period January 1996 to November 1996. USAID then provided a long-term grant of Z$13,523,810 for the period November 1996 to August 1999. In addition, the CA received approximately Z$3,131,457 from other donors in the period 1995 to 1998: The Netherlands -- Z$2,695,000; Global Guardians Trust (Japan) -- Z$174,192; WISDOM -- Z$110,765; and the British Council -- Z$150,000. (Price Waterhouse, 1997:5)

As of March 1998, each Council member pays a "joining fee" of Z$3,000 and thereafter an annual fee of Z$1,500. In addition, RDC members pay the CA a levy not to exceed 2.5% of the gross revenues realized from CAMPFIRE activities in their Districts. The actual Z$ amount the CA receives varies and can drop or rise sharply in response to local conditions (e.g., drought).

Findings

The need for a representative lead agency for CAMPFIRE was recognized from the beginning, with the idea for the CA arising in 1989. At the meetings leading up to the CITES convention in 1989, there was great concern within Zimbabwe about a proposal to place elephants on Appendix 1, a step that would prohibit trade in ivory. District representatives came to Harare to meet and prepare a statement to be read opposing the ban at the CITES meeting. At that time the RDCs decided they should continue as a group to lobby for their interests at the national and international levels. By 1992, the CA was recognized as the only group that could claim to represent a wide membership base of rural people from communal areas.

It is clear from interviews with CCG members, other stakeholders, and documentary references that the CA is now viewed as the lead CAMPFIRE agency. This is true even for the RDCs, wards, and villages. Local agencies visited by the evaluation team indicated that they look to the CA for leadership and assistance to help them do their jobs. ZimTrust, like other early CCG members, has also been very supportive of the creation of the CA. It felt the NGOs were being placed in an impossible role as combination technical advisors and "gatekeepers" between the funding agencies such as USAID and the RDC clients. They were having to decide on priorities. CAMPFIRE needed a support organization of constituent members to lobby within the government, and the CA has begun to fill this need.

It is too early in the CA's institutional evolution to make final conclusions regarding its performance as lead agency. It has only had approximately 18 months to organize itself and install the necessary management infrastructure and processes to discharge its responsibilities fully. In its effort to acquire the essential capacity to administer the program, the CA has received effective assistance from the IC.

Although the MLGNH recognizes the CA as the lead CAMPFIRE agency, it is critical of the current focus, organization, and implementation of the Programme, which it believes subverts the original intent. CA revenues, they argue, go largely to support CAMPFIRE Secretariat, the CCG, and NGOs. The MLGNH would like to see a greater percentage of funds going directly to the RDCs.

The MLGNH envisions a different CAMPFIRE model that it views as preferable and more sustainable. Under its model, the RDCs would comprise the CA. They would appoint an executive committee (e.g., five RDCs serving for a set term). An executive director with 3-5 person staff would serve the executive committee. The GOZ and donors would provide assistance to the CA, as appropriate.

Conclusions

The evaluation team concluded that the CA has been effective in promoting CAMPFIRE. A key CA objective, as listed in its constitution, is "to promote the fundamental principle enshrined in the CAMPFIRE concept of proprietorship of natural resources by producer communities." CA staff are effective in articulating the CAMPFIRE philosophy to diverse audiences both in Harare and in the field and have gained international exposure. Clearly, the CA can perform the program advocacy role and enhance it further with the help of specialized agencies such as ART.

With respect to the MLGNH criticism, the CA is using its funding as the GOZ and CA agreed to, and the CA itself recognizes the need for the kind of material and technical capacity-building support its CCG partners are providing its RDC constituents.

2. Providing Financial Support for Decentralization

Evaluation Issue: The CAMPFIRE Development Fund (CDF). *"The CAMPFIRE Development Fund was designed as a project-specific mechanism to redress leadership, coordination, and customer satisfaction lamentation. How has it performed in addressing these concerns? What can be done to improve its performance? What should its ultimate status be? Should it be project specific and allowed to dissolve at the end of NRMP II or is a longer term approach warranted? What might that approach be? Options that are possible include a simple grant fund, a matching grant fund, a special revolving loan fund, a trust fund, an endowment, etc." (SOW, section C3a)*

Findings

The CDF was established as a grant fund with $US6 million. The grants management unit is the IC, with specific responsibility to "execute and administer specific support grant agreements." The IC is charged with collaborating with other CCG members in identifying proposals, developing grants, allocating funds, and monitoring grants. The IC is also tasked to "assist PET to determine whether or not proposals submitted by the RDCs meet technical requirements for funding as agreed upon by the CCG and USAID." NRMP II provided for the CA to hire its own Project Development Officer (PDO) to help the RDCs access the CDF.

NRMP II documents themselves are, however, unclear about the long-term division of responsibility for CDF grant development, approval, and management and variously allocate these responsibilities among the CA, PET, and IC. Field interviews and PET minutes suggest, that at least initially, there was some informal discussion about the CA eventually undertaking an increasing share of CDF management responsibilities (see SARP ULG Midterm Evaluation, PET Minutes, and Plan of Operations, June 1995). The PET committee members agreed that the CDF would make grants for two types of projects: institutional capacity-building and infrastructure. To reiterate, capacity-building grants can be used for equipment, salaries, technical assistance, and training of new staff and community participants. The infrastructure grants are to support capital investments. No such grant has yet been made because most proposals for infrastructure have not contained the needed social, economic, technical, and environmental feasibility analyses. In addition, for both development and implementation reasons, a decision was made to allocate the two types of grants sequentially, beginning first with institutional capacity-building.

The grant award process is as follows. The RDCs submit proposals to the CA for initial project development. The CA PDO presents them to the PET project subcommittee for review and commentary. The PDO (and during his tenure, the CDF Advisor) then visits the RDC and/or ward to discuss possible modifications before the project proposal is sent to the full PET committee. The PET committee members may send a proposal back for further development. If the PET approves the proposal, the IC screens it once more and then prepares the grant document for approval by USAID and the GOZ. The proposal review chain can be summarized as follows: CA project officer → PET subcommittee→ PET committee → IC → USAID + GOZ.

Grants are made conditional on pre-award financial and accounting surveys, whose purpose is to attempt to certify that grantees, thus far limited to RDCs, have adequate financial accounting and control and commodity management practices in place to permit receipt of foreign aid funds. The practices of many RDCs have had to be brought up to the minimum standards before USAID grants were possible. Moreover, no RDC had sufficient controls in place to permit use of the cash advance system for grant payments. The IC has set up a reimbursement system that requires the RDCs to manage their available funds (from other sources) in such a way as to benefit from the activities intended by the CDF. One RDC has been successful in this regard to the point that it now qualifies for the cash advance method of grant disbursement. The IC expects the financial management standards of other RDCs to improve similarly so as to meet the requirements for advance payments.

Even before the CDF was set up, many staff members of the CCG organizations encouraged the RDCs to submit proposals. As a result, when they began operations, the IC and PET had to sift through over 200 requests for funding. Few of these were fully developed proposals or directly relevant to the project's conservation and NRM objectives. Most PET members felt that the quality of the proposals was very low. Many were for inappropriate projects that rarely embodied CAMPFIRE principles. Considerable guidance, rewriting, reworking, visits to prospective grantees to discuss and review proposals, and negotiation of proposals by IC staff members, consultants, and CCG members in Harare were necessary to get fundable projects from the RDCs. Staff attempt to incorporate commentary by the PET full committee and subcommittees, the IC, and USAID in the final grant awards. Eventually the CA, IC, USAID, and CCG agreed to a three-page grant and proposal guideline form that was distributed to all RDCs. Despite these problems, the CA has been urging fast award of the grants, mostly by requesting that the IC conduct pre-award surveys and by hiring staff and a consultant to assist the RDCs in developing their proposals.

Even with this considerable effort, few actual or proposed projects contain participatory approaches to diversified CBNRM at the village and ward levels. Instead, the PET and USAID judged that an initial round of direct institutional support to the RDCs was called for. One byproduct of this entire process is a relative homogeneity in grant design. Each grant thus far has contained similar elements. There are line items for capital equipment, such as trucks, computers, radios, office equipment, camping equipment, motorcycles, and mountain bikes, followed by a line item for new RDC staff positions. The grants also pay for technical assistance and training, often supplied by third-party trainers such as the ZimTrust, ACTION, or WWF. Line items for "soft" expenditures such as training and minor equipment (flip-charts, radios, camping equipment, look and learn visits, etc.) constitute only a small percentage of the overall grant and rarely exceed $US25,000 per grant over a one-year period. Grantees typically hire RDC CAMPFIRE Coordinators and equip them with a vehicle, radio, and computer. Most also hire additional ward promoters, game scouts, and resource monitors and equip them with camping equipment, mountain bikes, and radios. RDC staff manage and control the funded activities.

As of February 1998, the CDF had made 20 grants to the RDCs, obligating $Z24.2 million, or about $US1.6 million. The first grant went to Hurungwe in October 1996, followed by Mazoe and Gokwe North. The most recent grant, approved in February 1998, was to the Kusile District. Of the first seven grants made, only the Hurungwe RDC had significant CAMPFIRE wildlife income. Not until May 1997 did the biggest CAMPFIRE revenue-producing District, Nyaminyami, receive a grant. The PET project subcommittee staff felt that the high wildlife revenue-producing Rural Districts did not need a grant as much as the RDCs with little or no existing Programme revenue did. The RDCs themselves have made total cash and in-kind contributions to the grant activities amounting to 22% of the grants.

The 20 grants issued to date have been used to purchase 19 trucks, 20 computers and printers, 26 two-way radio sets, 6 motorcycles/motorbikes, at least 76 mountain bikes/standard bicycles, 5 fax machines, 2 cameras, 12 sets of camping equipment, and at least 15 sets of assorted office furniture. The grants have also been used to pay for some technical assistance and at least 121 salaried resource

monitors, game scouts, and ward promoters and 32 Rural District staff (coordinators and clerk/typists). All grants include a provision that the RDC will pick up the recurrent staff costs at the end of the grant. If not retained by the RDC, the CA hopes these new workers will have increased their skill levels during the project and will find employment more easily after the grant ends.

Review of the grant budgets shows that of all the CDF grants, an average of 30% of grant funds have been used for expenditures that *directly* filter down to the village and ward levels (see Table 11). As noted, many of the Rural District-level support services provide indirect benefits to local producer communities.

Grant performance over the short period of implementation to date has been mixed. While the RDCs are grateful for the additional resources the grants bring, many CCG members think the grants have been awarded too slowly and have not always been consistent with CAMPFIRE principles. The grants, as noted, resemble each other in terms of what is requested. When new staff are funded, this homogeneity can be a problem. For example, there is little guidance on what CAMPFIRE managers should to do to promote CAMPFIRE when the Rural District has few wildlife resources. Most grants have been based on the RDC District Plans developed by the RDCs with the ZimTrust or, in some cases, the assistance of other CCG members. It is not clear that the training activities and even equipment requests in the proposals are based on a systematic needs analysis.

For grants that call for development of NRM by-laws, no methodology is spelled out for how ward and village by-laws are to be developed, and it is not clear that newly hired staff under the grant have the conceptual and analytical skills to facilitate such development. The approved proposals are rarely clear about how the RDCs are to recruit candidates for managerial posts and who decides who gets the ward-level jobs of monitors or scouts. The RDC discusses the job descriptions, which the IC approves, followed by competitive procedures for hiring. Last, most grants make ward-level workers report to RDC staff rather than to ward committees. This practice means that existing ward committees do not have responsibility for hiring, monitoring and evaluating, and firing or retaining ward-level workers.

There is an assumption among some CCG players, and especially the CA itself, that essentially all ideas and projects coming from CA-member RDCs will and should be funded. The goal of project development favors "getting the thing funded" rather than to teasing out the best ideas from the villages and wards. Project development procedures pre-screen out only non-CAMPFIRE compatible activities. Although village consultation is a general practice, the methodology for grant or proposal development does not yet involve the proactive use of Participatory Rural Appraisal (PRA) or other field-based methods. The staff involved in project development lack experience or skill in negotiating a set of alternative CBNRM project concepts with a producer community, with a view to developing the best environmentally and economically sound ideas. Instead, weak ideas get carried forward for project development, when better judgement on the ground would have screened them out earlier in the review process. In proactive proposal development, complex pre-screening happens *before* proposals get to a review committee.

Table 9: Distribution of CDF Grant Benefits (in $Z at 1$US = $Z 15)

District	Total Grant	% of Grant In District Capital Equip.	% in District Wages	% District Training	Sum Directly Benefiting Ward	% Benefiting Ward	New Ward Jobs	New Council Jobs	Job Titles At Council Level
Mazowe	673,000	63%	17%	11%	25,000	4%	0	2	Campfire manager and clerk/typist
Chipenge	826,980	57%	23%	12%	72,210	9%	0	2	Co-ordinator and clerk typist
Gokwe North	774,777	65%	9%	10%	122,006	16%	0	1	Project Bookkeeper
Hurungwe	917,860	65%	8%	9%	167,000	18%	0	1	Assistant Campfire Coordinator
Nkayi	874,020	49%	16%	11%	190,500	22%	10	2	Assistant Campfire Manager, clerk/typist
Bulilimamangwe	1,293,200	40%	12%	21%	354,600	27%	2	2	training officer and accounts clerk
Chimanimani	1,361,000	35%	14%	23%	379,840	28%	4	2	Campfire manager and clerk/bookkeeper
Nyanga	1,340,040	40%	8%	24%	378,040	28%	5	1	Campfire manager
UMP	1,104,920	28%	22%	14%	333,220	30%	4	2	campfire coordinator and clerk/typist
Binga	1,698,700	42%	9%	20%	551,000	32%	0	2	Campfire Training officer and clerk/typist
Gwanda	1,592,650	42%	9%	15%	527,300	33%	5	2	Campfire manager and clerk/typist
Beitbridge	1,483,280	29%	13%	25%	494,880	33%	12	3	Training Officer, clerk/typist, Campfire Promoter + maintenance paid for by USAID
Kusile	1,493,300	42%	7%	17%	498,300	33%	6	1	Campfire Coordinator
Mudzi	1,187,910	34%	14%	11%	407,810	34%	15	2	Campfire Coordinator and clerk/typist + maintenance paid for by USAID
Muzarabani	1,348,428	28%	6%	8%	477,000	35%	10	2	Campfire Training officer and accounts clerk
Nyaminyami	913,600	46%	0%	28%	325,000	36%	11	0	
Chiredzi	1,218,850	26%	12%	25%	444,600	36%	9	1	coordinator
Tsolotsho	1,014,700	30%	16%	15%	391,000	39%	0	2	Training Officer and typist
Guruve	1,695,000	19%	9%	9%	800,900	47%	10	2	training officer and accounts clerk
Rushinga	1,403,505	31%	12%	9%	684,150	49%	18	2	Institutions Development Officer, clerk/typist + maintenance paid for by USAID
TOTAL	**24,235,720**				**7,624,556**	**31%**	**121**	**32**	
AVERAGE	**1,211,786**	**41%**	**12%**	**16%**	**381,228**	**30%**			

Source: CDF grant files

Note: A typical grant creates a new Campfire Unit at a District Council (if the Council does not have an active Campfire program), or it may expand the existing Campfire staff at the Council level. This staff is then equipped with a vehicle, a computer, printer, fax, flip-chart, and sometimes office equipment. In many cases additional ward promoters, game scouts, or resource monitors are hired and equipped with camping equipment and mountain bikes. The whole group are then equipped with several two-way radio sets. All staff are supervised by the District Council Campfire manager who in turn is hired by and reports to the District Council Executive Officer.

At the current rate of expenditure, there is a high probability that substantial funds -- a conservative estimate is $US1.6 million -- will remain unspent, even with the one-year extension to the project. If the money continues to be spent at a rapid pace, it is possible that the Fund can be whittled down, but the shift from capacity-building to infrastructural grants will likely slow the rate of spending to a point where more than US$3 million might remain in the CDF by the project completion date of September 2000.

Conclusions

The structure of the current set of capacity-building grants clearly benefits the recipient RDCs (see Table 11). There is considerable evidence that the strategy of providing economic incentives to encourage institutional change is working in some Rural Districts where a commitment to and quality of CAMPFIRE, wildlife, and other natural resource programs is clearly established and growing.

There is some unnecessary ambiguity about the CA's role in the CDF process. The CA is involved in proposal development, approval, grant management and implementation, and monitoring and evaluation. These multiple roles place the CA in a position of potential conflict of interest and subject to being perceived as "self-dealing" (a term used where the same organizations is involved in developing proposals and conducting feasibility studies, and approving the grants) vis-à-vis the CDF. In addition, this situation puts pressure on the CA to advocate for faster grant approvals, even where the projects are not ready or the RDCs do not yet have the financial capacity to manage the grants. Although not formally in the position of making funding decisions, the co-mingling of the functions of the CA and the IC potentially could delegitimize the organization. Ensuring that CDF management is clearly distinct from CA operations can only serve to strengthen the CA as an autonomous organization, whose role is to assist its membership develop viable, sound proposals that meet CAMPFIRE criteria. These attributes will serve the membership in finding funds irrespective of their source.

As with the CA, charging the PET with "recommending proposals for funding" creates for its members conflicting roles and potential conflicts of interest. The same agencies who may get funds out of technical assistance and training line items ideally should not be participating in the funding decision. Similarly, the same agencies asked to organize feasibility studies that accurately point out project deficiencies should not be forced to be the naysayers on the PET. The issue of self-dealing extends to the technical CCG staff as well, who are in the uncomfortable and undesirable position of needing to veto or approve proposals on the grounds of the technical soundness of those proposals it forwards to USAID/GOZ for approval. Some input from involved parties may be necessary and desirable, but formal involvement of neutral persons could reduce the overlap in roles.

Grant documents do not reveal the extent to which the project activity and its structure, modalities, and composition reflect widespread village and ward-level input in the planning and design of activities. Few projects follow all the criteria described in the document, "Approval Criteria and Procedures for Review of Projects to Be Assisted Under CAMPFIRE Development Fund."
The hiring of a CDF advisor and CA PDO has improved the rate of proposal development. The

before approving grants that contain salary line items (see the various PET and PET subcommittee minutes). The assumption and promise that the RDCs will sustain these new staff members with other funds has no economic basis. In Rural Districts that do not have much chance of generating a wildlife-based income stream, alternative natural resource income streams are not specified. The short-term expansion of salaried village and ward-level resource monitors and promoters could jeopardize the long-term sustainability and credibility of the program. Districts that once relied on a sustainable combination of volunteer labor and a smaller number of salaried monitors paid out of CAMPFIRE revenue may find this approach to be more difficult in the future.

- Grants to the RDCs have not been made conditional on their having a track record of applying the desirable revenue-sharing levels recommended by CAMPFIRE, as articulated in CA policy. Opportunities to encourage some of the wealthier CAMPFIRE RDCs to apply the rule are thereby lost.

Recommendations

The CDF should be maintained as a separate fund under IC management until the end of FY2000 (September 2000). Consistent with the FY2000-A and FY2002-A scenario (2000-2002), the CDF should be progressively transferred to a distinct and separate grant management unit within an existing Zimbabwean organization. (The last section of this evaluation and Appendix G outline recommendations for how the sinking fund the team recommends for the future of the CDF might operate. The team did not see locating the fund elsewhere in the southern Africa region as a desirable option for CAMPFIRE because of the importance of sustaining Zimbabwean ownership of the Programme. However, keep currency held with an international offshore financial institution, protecting the capital by permitting the funds to be held in hard currency. The IC can continue to *advise* a CAMPFIRE (CCG)-level committee as it begins to interact with the sinking fund or trust organization managing the CDF. The IC can also continue to administer existing and pipeline institutional and infrastructural grants as per the current modus operandi.

During the transition and phaseout period of USAID/Zimbabwe's assistance, make every effort to manage the remaining funds in the CDF as if a sinking fund were already in place. Develop simpler procedures for grant allocation, pre-award certification, and grant approval, and make greater use of quick-release mechanisms for small grants. These procedures might require setting up a grants management unit inside the IC and operating with a modest, fixed, annual grant budget. For example, a fixed amount of about US$500,000 could be allocated to the annual CDF grant budget, of which 15% could be used to finance the overhead costs of a three-person grant management unit (project officer, finance and database officer, and administrative assistant). The overhead funds would also cover local travel costs for this staff and the costs of routine meetings of a rotating panel of voluntary jury members who would review proposals.

The CDF should be used to continue funding RDC capacity-building over the short to medium term. CDF funds should be sufficient, beyond what has already been spent, to finance two new

guidelines for proposal writing distributed to the CCG and District Council members appear to be realistic, helpful, and well-prepared. The CDF Advisor is preparing a project development manual.

The strategy of rapid disbursement of CDF funds poses risks to all members of the CCG involved in developing the grants, and could partly undermine the project and associate of the CAMPFIRE movement with unsustainable capital equipment and salaries, inequitable distribution of foreign resources, and top-down planning by urban elites and civil servants on the District Councils. The delays in awarding grant funds were acceptable, and even desirable. They amounted to the inevitable "start-up" considerations normal with any grant funding and revealed laudable fiscal caution and prudence on the part of the IC. Experience has shown that community-level grants take time to develop, are often small, and involve minimal capital equipment. The sense of haste appears in part to have been caused by the late start-up of the CDF and the decision to favor the local government level with the initial set of grants.

Several other areas of the grant process merit attention:

- The number of steps in grant development and approval is quite cumbersome to fund managers but they as well as recipients, appear to be necessary for a proper accounting of USAID funds. While the cost reimbursement method of grant payments can result in significant delays, the RDCs have managed to proceed with grant spending.

- The *de facto* limitation on eligibility for CDF grants to the RDCs hampers project development by reducing the incentive for village and ward communities to self-organize into cooperatives, user groups, and registered associations and eventually make themselves eligible for direct support. Village and ward communities may well wish to develop a project with their RDC, but they might also choose to develop a project activity in partnership with any number of NGOs, associations, or other registered organizations, whether or not they are a member of the CCG. The centralization of grant management responsibilities in the RDCs also subverts the learning curve for self-organized village and ward communities. Sophisticated ward committees such as can be found in Mahenye find that under the grant they move from one "tutor" to another, rather than being able to develop their own skills in project development, training, facilitation, and management in a learning-by-doing framework.

- It appears that the approach to grant formulation has been over-standardized. The intent was to expand the CAMPFIRE concept nationwide to non-wildlife-producing Rural Districts. The common need of each new District for staff to coordinate the NRM activities led to a similarity across the grants.

- There is weak or no evidence that producer villages and wards have an adequate understanding of the impact of the projects in terms of recurrent cost obligations and annual subsidies on the use of existing program revenues.

- The overall local revenue-generating capacity of the RDCs has not been adequately considered

projects under consideration, and at least five capacity-building projects for new RDCs, for a total of about $850,000 between now and the end of FY1999.

The CDF should be opened up to a wider range of potential grantees, specifically, to any registered private or public organization in Zimbabwe. These include NGOs, RDCs, government departments, conservancies, user groups, associations, cooperatives, universities, and any other organization legally able to receive grant funds under Zimbabwe law, as well as current CCG members. The only constraint on eligibility would be maintenance of minimal acceptable standards of financial accounting as per USAID regulations and US law affecting the use of foreign aid funds. Although in practice this requirement would eliminate the vast majority of potential grantees, organizations that did not meet the standard (such as women s clubs and ward organizations) would certainly be free to partner with a stronger, support NGO that did meet the requirement. Such mentoring partnerships should be explicitly favored in a revised grant criterion. Criteria would change to reflect the post-Mission closeout arrangement, if adopted.

The ambiguity created by the overlapping roles some organizations play in grant preparation, approval, management, and execution should be rectified as soon as possible, in part by involving neutral reviewers and in part by establishing an explicit set of approval procedures. These changes will be increasingly important as the fund is opened to a wider pool of potential recipients.

Following FY2002 (September 2002), a neutral review committee, to be comprised of a selected, voluntary panel of representatives of the CCG and other parties interested in and involved with Zimbabwe's CAMPFIRE movement in general (such as retired faculty, former members of the Board of Management, etc.), should be set up to handle the proposal approval process. To keep the post-NRMP II CDF vibrant, the CA should consider delegating chairmanship of this "CAMPFIRE Fund Committee" annually among the CCG movement partners. A long-term local administrator could be employed, using Fund revenue, to manage the links between the CAMPFIRE Fund Committee and the organization administering the fund. The funding agency can monitor the administrator. A two-stage proposal process on a competitive basis, as described in Appendix G, should be considered.

Once the fund is put on a competitive basis, USAID and the GOZ should revisit the necessity of pre-approving grants to non-RDC CDF grantees. It is common practice for donor agencies to send annual reports to the Government that include a list of the grants made, with a brief synopsis of their purpose and activities. USAID might again try, with the Government, to get agreement to operate on this less stringent basis.

Evaluation Issue: Infrastructure Development. *"To what extent has NRMP II and CAMPFIRE implemented policies and procedures to properly review the technical feasibility of proposed infrastructure development activities and what if anything should be done to further promote the sound design and implementation of infrastructure development activities?" (SOW, sec A.9.)*

Findings

The CDF has US$3 million identified for physical infrastructure investments, but, as noted, no physical infrastructure proposals have been approved. PET committee members have been slow to approve infrastructure requests, in part because of legitimate doubts about the appropriateness of using grant funds to subsidize commercial activities absent a serious business analysis. The members also have valid concerns about the technical, social, environmental, and economic feasibility of requests for electric fencing, irrigation projects, and tourist chalets. This point is clear in the case of some tourism projects. WWF-funded studies of three ecotourism campsites/chalet projects on communal lands concluded that they were unlikely to be profitable except under limited conditions. Two community-based ecotourism proposals that are nearly ready for final consideration by the PET. The proposals are, however, not convincing as to profitability or management strategies, although these aspects are being critically reviewed by CCG agencies. There was some private sector (small-scale) development of bed and breakfast-type accommodations on communal lands in various parts of Zimbabwe, but those initiatives were private and did not require assistance. This information suggests that the enthusiasm for ecotourism projects on the part of the RDCs, CA, and other CCG members may require closer examination. At present, there is no overall CA level strategy for CAMPFIRE ecotourism development and marketing.

Box 5. The Rwenge Electric Fence Proposal

The evaluation team visited the Hurungwe Rural District Council, with which it discussed the Rwenge elephant electric fence for wards 13 and 15 requested under the USAID CDF infrastructure program. The fence is something the concerned local communities urgently want. Delays in funding led to"awareness meetings," facilitated by the Hurungwe CAMPFIRE coordinator and Zimbabwe Trust. The meetings led to a request that the CASS carry out a social impact study of the project. The study was done, but unfortunately was not carried out in the affected areas and was therefore rejected by the Hurungwe Rural District Council. The delay in implementing this project is cause for concern, as some illegal settlers may start setting up residence in the areas reserved for wildlife management. In addition, the rate at which people are being killed and injured by wildlife is rising. During the period between April and May 1997 alone, an elephant killed three people in the same day, and a buffalo injured a young girl and a man in the same area. The local safari operator dealt with these problem animals. The project still has not been funded. Steps need to be taken to bring this process to an

Another example of a problem proposal is one for veld fire management that is ready for consideration by the PET. Its economic justification is not convincing, nor does it reflect appropriate and current concepts on veld fire management. Ward and District representatives, as well as technical representatives of other lower level groups, have participated in assessing the proposal. Examination of a wildlife fencing proposal showed a flawed definition of the problem, and the area to be fenced has no future as a wildlife area. One USAID-funded infrastructure project input that has been completed is a 10-office complex built in Harare to house the CA Secretariat and provide a permanent base for coordinating CAMPFIRE activities. (Box 5 provides a case study of the consequences of delays caused by weak proposals.)

To support proposal development, USAID held a training session in 1995 on the seemingly user-friendly Environmental Screening Form it developed to accompany a user-friendly environmental screening form (ESF) that accompanies proposals to their final approval. It held a training session in 1995 on the ESF, with follow-up sessions in Southeast Lowveld and the Eastern Highlands. The form was also introduced at a broader proposal development workshop held in November 1996 for CCG members and RDC staff. These various initiatives have, however, had no noticeable effect on RDC proposal development and did little to improve capacity to produce substantive proposals. Those developing proposals use private sector consultants and contractors through the practice of requesting tenders for a specific concept, such as an elephant fence, and then using the submission to develop the specifications and costs of the proposal.

When investments are made in physical infrastructure using CAMPFIRE wildlife or other revenues, the projects typically involve schools, grinding mills, water developments for wildlife, and wildlife fencing. Schools and grinding mills represent low technological risk, certainty of markets, and only moderate risk of management failures. Water points and wildlife fencing pose moderate to high levels of technological risk and higher risk of management failures because of a lack of attention to operations and maintenance.

Conclusions

The concerns expressed about the economic, environmental, technical, and long-term sustainability of most of the infrastructure-type project ideas are legitimate. The feasibility studies should not be sped up and their quality jeopardized by a need to accelerate expenditures. With no mechanism for producing sound proposals expeditiously, the CDF runs the risk of being a fund that distributes benefits to districts and communities on the basis of non-technical factors. If the initial plan to fund US$3 million in CAMPFIRE infrastructure is to be retained, increased technical support for the development of infrastructure grant proposals will be essential.

In the time remaining until the end of FY2000, it is unlikely that the CDF can finance more than a few infrastructure projects. There is not enough available engineering, economic, and environmental expertise in the CAMPFIRE administrative structure to analyze problems, examine alternatives, and develop worthy proposals. Under current procedures, outside consulting services cannot be procured without a lengthy process of preparing terms of reference and going out for competitive tenders. Without a project extension, little time would be left for implementation, monitoring, and oversight. In addition, most infrastructure projects would take years to implement, thereby going well beyond the NRMP II's project life. With an NRMP II extension until September 2002 and with outside consultants, there would be ample time to prepare perhaps 10 to 20 infrastructure projects in time to secure for funding under the CDF.

In developing proposals and before selecting a proposed project, more attention needs to be paid to a correct definition of the problem and a more complete examination of a range of alternative solutions. Fire management projects, for example, are risky because the technology is demanding and the effectiveness of fire control (as opposed to the management of risk) is not easy to demonstrate.

Community-based ecotourism investments have high potential returns but are also high risk because of market uncertainty and management failure. In addition, the tourism proposals under consideration for infrastructure grants are more suited to credit activities and reveal unacceptable weakness in basic business planning and financial feasibility analysis. Moreover, business enterprises should only be funded through a grant mechanism where a credit alternative can be implemented. Seemingly more appropriate would be business-related grants for feasibility studies, rural zoning studies that might, for example, make a tourism venture involving the viewing of game viable, or business-related training or other work that would improve the context for natural resource enterprises. The proposed grants for fencing should be subjected to rigorous social, economic, technological, and sustainability analyses prior to funding, so as to avoid the abandonment and/or lack of maintenance observed at some locations or the construction of functional but counterproductive and inappropriate interventions.

Recommendation

Solicit a major infusion of assistance in the development of infrastructure grant proposals from private sector businesses and technological consultants, who can design projects that have the best possible chance of success. Increased support for technical assistance for sound infrastructural projects could be provided by using NRMP II to fund further staff and some related support at a competent technical organization such as WWF. Its expertise could help the RDCs and communities develop worthy proposals, although the process could be lengthy because it should involve community participation. Communities must pay for these services with assistance or other funds (including those accessed through the CDF under the recommended provision for grant development funds).

Allowance could be made for project development grants to the RDCs, but with the proviso that these projects would be developed with consultations from the village level upwards.

Evaluation Issue: Empowering Local Communities* by *Raising Village and Ward Capacity – the ZimTrust.

Despite some of the concerns noted about the CDF activities, the CDF monies have made the RDCs more active partners in the effort to bring CF to the wards and villages. In most cases this has meant that RDCs have looked to existing CCG members for support. Among the CAMPFIRE CCG members, the ZimTrust has, since 1988, been working the most directly with local communities at the village and ward levels. The purpose of this involvement, as well as with the RDCs, is to develop a capacity for management and decision-making for sustainable NRM, particularly wildlife management, with the intent of helping people realize maximum benefits from the resources on their lands.

Findings

The ZimTrust was established as a charity in the United Kingdom soon after Zimbabwe's independence and was registered in Zimbabwe as a Welfare Organization. The ZimTrust has been receiving USAID support since December 1989 and depends on USAID for 75% of its funding. Current funding runs only through September 1998, and its future in CAMPFIRE is "uncertain," according to ZimTrust management.

ZimTrust's objectives are the "relief of poverty and the improvement in the quality of life" of the poor in Zimbabwe. Its policy is to support "the development of representative community-based institutions of an economic nature." The focus has been on the communal areas and on support for institutional development at the village and ward levels, especially to help facilitate organizational and management capacity and a capacity to manage financial resources and run projects.

Box 6. USAID Funding to the ZimTrust under NRMP I and II (US$)

1989-1992		2,706,000
1st Amend.	(- 1993)	768,800
2nd Amend.	(- 1994)	50,000
3rd Amend.	(- 1995)	325,000
4th Amend.	(- 1995)	3,390,412
5th Amend.	(- 1997)	1,197,016

ZimTrust initially began its CAMPFIRE involvement by providing services to the Guruve and Nyaminyami Districts and later to four districts in Matabeleland as a pilot project. Currently, ZimTrust is obligated under NRMP II to provide services to all RDCs and other support agencies. It seeks to benefit rural communities through institutional development, training, and advisory services to enable them to use their natural resources in a sustainable manner and to manage the income derived from such use. The range of services include: assisting in training for the wildlife monitors; development of infrastructure (e.g., electric fences and watering points); training and technical assistance for area managers in the districts; necessary vehicles, radios, office equipment, etc.; the involvement of women in wildlife production and management; conservation education and training for schools and communities; and development of wildlife and development curriculum and material for secondary schools.

In terms of field operations, the ZimTrust facilitated establishment of the CAMPFIRE committees under the CA umbrella; those members are democratically elected at the village, ward, and district levels. It has provided for USAID-funded infrastructure for the RDCs to work in, as well as for training for all committees on the organization and management of the Programme-- tendering, marketing their safari area, setting quotas, and the functional skills needed to manage a business. It has helped the communities invest their money in social and income-generating projects.

In many ways, it can be said that it was ZimTrust that effectively operationalized CAMPFIRE at the village, ward, and district levels through its early capacity-building support. It took the early risk of pushing the new idea of decentralization at a time when the local levels were just beginning to think about it. ZimTrust has been involved with conflict resolution and confidence- and awareness-building

at all levels within the CAMPFIRE Districts in which it intervenes. It has provided a great deal of the support needed to help local people see the direct links between wildlife and their needs.

ZimTrust's work "on the ground" with the RDCs is generally well-received. Based on the team's field interviews with people trained by the ZimTrust, it appears the training was useful and appropriate. Evaluation team interviews with ZimTrust field managers confirmed that they were conversant about CAMPFIRE and the program's objectives. CA management readily acknowledges that ZimTrust does very good work in the field, and it relies on the ZimTrust to deliver much of CAMPFIRE's essential services to the RDCs, wards, and villages.

ZimTrust is promoting a number of changes in CAMPFIRE. One is to push NRM and control below the RDC level. It believes that the CAMPFIRE philosophy can be fully realized only as control of these resources takes root in the wards, especially the villages, where people have the most direct stake in sustainable wildlife management. Villagers have to experience the CAMPFIRE dividends directly for the philosophy to be realized. It believes CDF money should be spread out over a longer period of time. It would like to see greater attention paid to building stronger *regional* CAMPFIRE constituencies. It believes that if the regions were able to employ their own people and were capable of coordinating their own programs, submitting proposals, bringing in the people they need for their own particular problems (and cutting out the current bureaucracy), the Programme would begin to move more rapidly.

To measure and monitor capacity, institutional development, and sustainability, the ZimTrust developed a Process Oriented Monitoring System (POMS) instrument and process, which it is applying in a number of CAMPFIRE wards. It has also been responsible for putting into place, with much effort, a village to ward to district-level system that communities can apply in determining how they would like to use CDF funds, leading to the development of ideas and culminating in proposals being sent to the CA and IC for evaluation and funding.

Conclusions

ZimTrust has an excellent on-the-ground field presence and provides needed services very effectively. The CA and other CCG members see it as effective in providing services in the field. For its part, ZimTrust is critical of some other CCG members, which sometimes impedes effective collaboration. In addition, by virtue of making its own direct grants and sub-contracts, ZimTrust operates differently from other CCG grantees. This distinction gives the appearance of a hierarchy in the importance of CCG partners that is unnecessary and inappropriate to the collegial nature of the CCG.

The POMS system ZimTrust uses is methodologically and practically questionable. It is a very cumbersome instrument, requiring considerable in-field judgement (permitting unacceptable inter-coder error) and the application of non-transparent response scaling procedures. That said, it represents the major tool and effort to monitor and to determine institutional development within CAMPFIRE.

Recommendations

ZimTrust should develop, in collaboration with the CA and concerned RDCs, an exit plan for the specific activities it is currently working on with the RDCs through NRMP II. It should develop new activities in conjunction with other donor funds or partnerships, or even through community support in accessing future CDF funding.

The project agreement should be amended to extend the timeframe of ZimTrust's involvement in NRMP II. Given its excellent support to CAMPFIRE in both Phases I and II of the NRMP, and the regional placement of its personnel, the ZimTrust is uniquely positioned to achieve field-level results.

Continued funding for the ZimTrust should be channeled through the IC, as is currently done with the other CCG CAMPFIRE partners. This recommendation in no way reflects negatively on ZimTrust's capacity to manage and report on USAID funds, something it has done in an excellent manner and in full compliance with the intent and requirements of the contract. The reasons have more to do with creating a perception that USAID is treating the CCG partners equitably in its funding and with improving relationships within the CCG and between USAID and all its grantees. This step will also enable all CCG partners to move toward a USAID graduation and closeout plan under the same parameters.

Evaluation Issue: Reaching Communities through Public Education -- ACTION

Findings

ACTION Magazine, an affiliate of ART, was established in Harare in 1987 (see Box). It began participating in CAMPFIRE in the first phase of the NRMP project and has expanded its activities to include information, communication, and training and environmental education linked to CBNRM. It has had experience operating similar activities in the wider Southern Africa Development Community (SADC) region. Under NRMP II, ACTION has been operating as a subcontractor to the ZimTrust under a grant. It sees its role as performing outreach within the CAMPFIRE Districts.

Box 7. ACTION's Overall Aim

Increased awareness of environmental education with a focus on CBNRM.

ACTION's 1997-98 workplan responds to the needs of CAMPFIRE communities as perceived both directly and indirectly through the input of youth, teachers, extension agents, and the professional RDC staff, as well as other agencies supporting CAMPFIRE. The plan sets forth five outputs:

(1) Effective project management and increased implementation capacity;

(2) Educational materials relating to the environment and health, to be provided to all CAMPFIRE district schools;

(3) Appropriate and relevant secondary curricula and educational materials that link with and reinforce CBNRM within CAMPFIRE districts;

(4) Improved teaching and learning about the environment within the CAMPFIRE districts' schools and colleges; and

(5) Links among schools and their communities with reference to CBNRM.

A number of sources viewed ACTION's performance as effective and supportive of the CAMPFIRE Programme. The recent NRMP II planning workshop noted that Action "...can now provide adequate services to 12 RDCs that have CDF funding in place." (NRMP II Annual Planning Workshop Report, August 1997). Interviews with members of the CCG elicited favorable assessments of ACTION's work for CAMPFIRE. Teachers and school staff were active and involved in the program's field activities. In a region where materials for rural classrooms are extremely limited, ACTION has become a greatly sought-after medium for communicating environmental and health issues relevant to rural communities. It has been estimated that 25% of Zimbabwe's rural children in grades six and seven gain hands-on experience with *ACTION Magazine*. Seventy percent of Zimbabwe's rural teachers were reported as having access to *ACTION Magazine* in sufficient numbers to make its use viable in their schools. (Russel & Murrey, 1993:1,2)

The evaluation team visited ACTION's offices in Harare, talked with the director and staff, observed various aspects of the operation, examined its project review reports (e.g., ACTION, Quarterly Narrative Report, December 1997-February 1998), and reviewed its published materials. The team verified that *ACTION Magazine* "also assists CCG members and other program participants in developing program communication methods and materials (publications, newsletters, flipcharts, posters, handbooks, and public relations materials). At the RDC level, ACTION trains District officers and community representatives in environmental education and related topics." (CAMPFIRE Customer Service Plan, 1997:8).

At the same time, ACTION suffers from serious capacity constraints, most likely linked to the extensive scope of its outreach, which includes the SADC countries of Namibia, Zambia, Swaziland, Lesotho, and Botswana, as well as Zimbabwe.

Conclusions

The ACTION organization is very clear about its objectives, strengths, and limitations and has a viable plan for achieving its mission of CAMPFIRE support. It shows evidence of being well-managed and realistic in its outreach. ACTION has the capacity to produce very user-friendly materials on policy dialogue for target audiences, it has a good sense of what will be easily understood and digested, and its materials are professionally prepared and disseminated.

Action staff appear to have a solid understanding of the CAMPFIRE principles and how to communicate them to diverse audiences. ACTION can provide materials for Programme advocacy.

All of ACTION's core funding comes from the ZimTrust under the NRMP II project. Management is aware of the danger of dependence on one donor and is actively pursuing other sources of funding.

The evaluation team concluded that ACTION is doing a good job and is a very valuable resource for CAMPFIRE. It sees ACTION as an excellent CAMPFIRE resource for communicating policy changes to rural school children across the country.

Recommendation

Continue ACTION's role in CAMPFIRE, with particular reference to supporting the CCG (with materials) and Ministry of Education involvement in policy dialogue and program advocacy.

Evaluation Issue: Social and Economic Impact of NRMP II and CAMPFIRE Activities. *"To what extent is NRMP-II (and CAMPFIRE, in general) continuing to provide meaningful benefits to participating communities? What if anything, should be done to augment NRMP-II and CAMPFIRE* ***benefits to and impacts on producer communities?"*** *(Emphasis added) (SOW, A1)*

Findings

CAMPFIRE has championed the concept of directing trophy hunting fees to local populations. Safari operators are well-organized private sector groups, some of whom have excellent connections all over the world. In 1995 these operations generated over US$1,600,000 in revenue from leases with the RDCs for access to communal lands. Of that, initially the RDCs devolved between 50% and 80% to local communities at the ward and village levels. Other districts have become interested in this approach, as have adjacent countries facing similar wildlife/human competition for limited resources. These successes are directly attributable to the CAMPFIRE movement.

CAMPFIRE continues to generate meaningful benefits for participating communities receiving wildlife dividends, despite some problems associated with the RDCs' practices in wildlife-rich Districts devolving dividends to producer communities. Some US$1,090,362 were generated during FY1996 alone, of which about half found its way, in one form or another, to communities below the Rural District level. The ripple effects of this much money, turned over and over, on these local rural economies are impossible to quantify, but must be dramatic. Thus, CAMPFIRE is already an important motor for economic development.

Nevertheless, the team found, as have others, that while non-consumptive resource utilization such as ecotourism and photo-safaris have produced significant revenue increases over the past few years within CAMPFIRE districts, little is channeled *directly* to local producer communities. In some cases, the RDCs have kept the funds for their own use, noting, however, that they generally apply them for the "common good," since "not all district wards can benefit from their 'own' wildlife resources." In other cases, the private sector captures essentially all revenues. As mentioned elsewhere in this report, the CA has made commercial gain from game viewing and cultural tourism a priority for the Programme, and communities are pressing for change. The ZIMSUN hotel

agreement with the Mahenye community offers a measure of optimism for the broader CAMPFIRE effort.

In the case of the extensive, privately owned commercial farms and game ranches found within many districts, neither the RDCs nor the producer communities benefit from any kind of levy on the wildlife utilization taking place. Private wildlife conservancies present a more mixed picture, with potential for outgrowing (e.g., ostriches in SAVE) and ecotourism spinoffs (e.g., Malilangwe in SAVE). At the same time, these private properties are important sources of employment, although estimates of the amount of employment were not available.

Initially, as noted, member households in the producer communities wanted to get their dividends in cash. However, once the total dividend due a ward was divided into equal shares, in many modestly endowed wards it became clear the individual household might get no more than Z$10-116 -- less than US$1-$9. This prompted the households to decide that it would be better to combine their common funds for larger activities. Many useful community projects that otherwise would have gone without financing have been funded in this way. Moreover, although US$9 may not soundlike much, in the poorer communal areas cash is only a small part of the rural economy. Such sums are sufficient to cover critical grain shortfalls or purchase necessary supplies or pay for the services of grinding mills. Moreover, WWF studies show that the habitat that supplies CAMPFIRE revenues also leads to significant non-CAMPFIRE benefits as well. Finally, recent World Bank data quantify the limited role played by cash in communal areas, placing average per capita income between US$21-$34.

The process of determining what to use the revenues for is dynamic. The RDCs ask local communities for a list of activities on which they wish to spend their (ward) dividends. In some Districts, the RDCs "accept" all proposals for the use of producer community dividends; in others, they play a stronger role in influencing ward proposals, suggesting alternatives such as social projects. This system has led to a healthy and growing debate on the use of such funds (see the case of the Gwanda District presented in Appendix F).

As far as how the dividends are actually used, according to CA records on current fiscal year USAID NRMP II grant funding, 12 RDCs *already* pay the full cost of the minimum number of CAMPFIRE staff (a CAMPFIRE coordinator, game scouts, and game guards) and operation costs -- and should be considered "graduated" (see Table 2). District wildlife revenues range from a low of Z$110,000 (US$7,300) in Mudzi to a high of Z$4,462,000 (about US$300,000) in Nyaminyami. One Rural District with over Z$1,319,000 in wildlife revenues used USAID NRMP II money to pay for its CAMPFIRE coordinator, game scouts, and expenses.

Local communities are using the benefits from CAMPFIRE natural resource dividends for a wide range of activities. Heading the list are social infrastructure development projects, examples being: roofing materials for a teacher's cottage; a typewriter for a school; paint for schools; school furniture (tables and chairs); rehabilitation of a dam; construction of primary schools, with homes for teachers; construction of health clinics; rehabilitation of irrigation; construction of a ward-level administrative building; cattle dip pens; poultry production; and sewing clubs.

The team observed that village-level purchases of grinding mills have also been popular. They permit local people to grind their corn into flour without the heavy labor of pounding it. Such mills can be seen as a way to redistribute the benefits of the wildlife revenue to the poor, who are the most in need not only of such a labor-saving device, but also of a mill that runs at below normal costs. The team noted such a communal village mill, paid for out of wildlife revenue, in Beitbridge. There the dividends only covered the cost of the fuel and the salary of the miller. The overhead costs for the building and replacement parts were not included in the price of sales, suggesting a role for micro-enterprise advisory services.

Conclusions

Rural communities in the CAMPFIRE Districts are receiving significant benefits from the return of wildlife dividends and from the capacity-building they have received through training, awareness raising, and other field-level institutional development. One of the most important impacts of CAMPFIRE and NRMP II support has been the building of local concepts about local governance, ownership, and management of the local communities' natural resources. These successes will have long-term implications for the country as the ideas continue to work their way through society.

Records suggest that annual CAMPFIRE revenue of Z$500,000 or more should be adequate for RDCs to fund the CAMPFIRE staff costs out of their wildlife revenue share (currently as much as 50%).

Recommendations

Capacity-building should continue to be supported at the district, ward, and village levels, with priority given to the latter. The focus should be on wards and Districts that have identified "new" NRM ventures whose development needs support. That is, NRMP II CDF funds need to be targeted toward helping local communities "with a good idea" for a new NRM venture obtain financial support to develop the ideas into a project proposal that can be submitted to a local bank or other institution for funding. The priority for such ventures should be the wards in CAMPFIRE Districts that currently are not benefiting from significant wildlife dividends.

Where significant CAMPFIRE dividends are being received at the ward level, NRMP II support should be targeted toward looking closely at the issues involved in assuring the long-term availability of this resource. The CA and others should focus every effort on providing the means to protect these resources, including the authority to limit in-migration.

Future funding for capacity-building with the RDCs should not cover the salaries of CAMPFIRE staff if the RDCs can be expected to cover them themselves.

3. Building a Capability for Improved Natural Resource Management

Evaluation Issue: Protection and Management of Wildlife Populations and Habitat. *Quota-setting as an essential component of sustainable consumptive utilization of wildlife.*

Findings

In CAMPFIRE areas, quota-setting is a participatory effort conducted at annual workshops and involve various stakeholders, such as representatives of communities in wildlife-producing areas, safari operators, and the DNPWLM. The DNPWLM, WWF, and ZimTrust assist the efforts of participants with instructional workshops and meetings, employing user-friendly manuals and visual aids. Information from stakeholder groups, aerial surveys, ground counts (where they exist), and previous quotas and hunt return forms (including the monitoring of trophy sizes) are brought together through a "triangulation process." The data are used to propose quotas for hunted species in each District. WWF's Resource Management Support to CAMPFIRE Project (SUPCAMP) and ZimTrust/WWF/SCI also support the program for quota-setting, providing essential training and facilitation. These efforts are critical to the quota-setting in CAMPFIRE areas.

In some areas, the setting of quotas generates considerable debate. Some stakeholders at the ward and District levels feel the quotas should be higher than what other stakeholders recommend. In the end, the DNPWLM reviews, comments on, and approves the proposed quotas for application in each District. A continuing trend toward devolution of quota-setting tot the ward level is, however, apparent.

With respect to the actual hunting itself, DNPWLM regulations require that professional hunters complete 11 different forms. The hunters claim that there is redundancy and irrelevant information on the forms that leads them to believe that the forms are an unnecessary bureaucratic exercise. Because the hunters doubt the relevance of the forms, they attempt to avoid filling them out, which promotes non-compliance and the potential for corruption.

The law does not require completion and submission of the CA/RDC hunt record designed by the WWF. Voluntary compliance is increasing but has not yet reached 100%. As a result, it is likely important data are missed, and other abuses are able to enter the system. Some observers within the DNPWLM state that the hunting quotas are not exceeded and that the quotas for elephant and buffalo are filled in most areas of the country. However, this information is not always reflected in the hunt report forms. The fill rates for the quotas for lions and leopards are estimated at 75% (Appendix L).

The DNPWLM is taking remedial steps to address the deficiencies in the hunt reporting system. Statutory Instrument 26 of 1998 contains a revised version of the problematic NP-9 form that now must be completed. This change will permit the capture of important data that may previously have been lost because of non-compliance with the voluntary CA/District hunt return form. Still more progress is needed, however, particularly in terms of streamlining the reporting requirements, which may be somewhat improved by the development of (1) the new forms, (2) a revision of Statutory

Instrument 26-98, and (3) a new quota-setting guide. The quota-setting guide, which is currently being prepared, is intended to provide wildlife managers with information on techniques, harvesting strategies, and the potential dangers of poor quota management.

An important issue that needs attention is the potential for induced genetic drift because of excessive selective hunting and poaching, as this practice may affect the value and genetic integrity of the hunted species. Excessive selective off-take of members of a breeding population of animals containing a particular trait may have adverse effects on the frequency of the appearance of that trait in future generations. With safari hunting, the trait is usually trophy size (e.g., horn length or tusk weight). Although genetics, food quality, availability, and the age of the animal influence trophy size, monitoring trophy size is a good indicator of the appropriateness of the quotas and hunting offtake (in terms of maintaining trophy size). However, monitoring trophy size does not necessarily indicate the effects of selective hunting on the genetic composition of the exploited species.

Trophies are measured and recorded using the Rowland-Ward system in most places, but the SCI system is gaining acceptance and may become the dominant one. The manner in which trophies are measured has relevance to the selection pressure on trophy animals. Using the example of the African buffalo, if the trophy measurement uses only the length of horns from tip to tip, then killing bulls in the prime of life would be favored. Because wear at the tips of the horn is greater than horn growth in older bulls, their trophies lose tip to tip distance and become less desirable as they age. If, however, the size and/or weight of the horn bosses are included in the trophy record, which continue to increase in older bulls, trophies from these older bulls become more valuable to hunters. This would promote trophy hunting of older bulls, which are thought to be less important in the breeding process, rather than prime bulls, which account for the majority of mating in breeding herds. In the case of the common eland, females may have longer (but thinner) horns than males. A measure that counts horn length, but not thickness at the base, which is usually larger for males, actually favors shooting females to obtain maximum trophy size, which would also decrease the number of mating animals in a herd.

Conclusions

Although it is desirable to devolve most of the responsibility for quota-setting to the districts and wards containing wildlife, other stakeholders still have important roles to play. WWF has a great deal of expertise that is essential to the scientific setting of quotas, and the DNPWLM has the ability to view larger issues such as movements of game animals locally, between districts, and internationally.

If the present quota-setting system is properly executed, it appears it is adequate for most species, even while constantly undergoing adjustment and refinement. Improvements in ground and aerial counts and environmental monitoring will enhance the informational base used to produce quotas and carry out other management efforts. An updated and accessible database from the DNPWLM's NP-9 form should provide better information.

Hunting offtake is relatively conservative for the most part, but may be reaching a plateau in some places. The quotas and levels of hunting need continuous re-examination as part of an adaptive management system.

Recommendations

Continue promoting better compliance by professional safari operators in accurately completing both the mandatory and voluntary hunt return forms. The percentage of elephant and buffalo reported is relatively high (see Table 15 in Appendix L). A simple study should be conducted to profile which professional hunters fill out the forms and which do not. A better understanding of the trends relating to completion of the form would help improve compliance and interpretation of the WWF database. WWF should create an additional page in the database manual to explain the variables used.

Adopt a trophy record system that favors the selection of older male animals, rather than prime males or females. Use of qualitative rather than exclusively quantitative measures would favor this change, which the GOZ and NGO conservation agencies should encourage.

Continue with the present methodology of quota-setting. This must be done within a better-defined policy atmosphere regarding problem animal control (PAC) and its inclusion in approved hunting quotas (see PAC comments).

Evaluation Issue: SUPCAMP. *The need for participatory resource surveys, land use plans, resource management options, and monitoring techniques that can be accomplished at district, ward, and village levels in a manner consistent with CAMPFIRE principles and field activities.*

Findings

Although land-use planning and local resource management are closely linked, CAMPFIRE has addressed this important NRM planning combination to only a limited extent. WWF's SUPCAMP, with funding from the Norwegian Agency for Development (NORAD), is providing essential services in support of CAMPFIRE that are beginning to address this issue. SUPCAMP works with selected rural communities in the Zambezi valley to develop, implement, and test, in a participatory manner, resource surveys, land-use plans, resource management options, and monitoring techniques that can be adopted and sustained at the ward and village levels. Project implementation began in September 1993, and the final project report was due March 31, 1998. ZimTrust, RDCs, and The DNPWLM have undertaken other small initiatives. Some of the new partners (DNR, FC, and SAFIRE) are bringing needed skills to the CCG in this area. (This issue and the potential contribution of these new CCG members are discussed further in Section IV.B.)

The evaluation team attended a SUPCAMP workshop, interviewed participants, and reviewed documentation. Recent technical reports discuss project outputs and comment on progress in three selected districts (Gokwe North, Guruve and Nyaminyami). For example:

- SUPCAMP has completed wildlife-related land-use planning exercises in all three districts. Although in general communities view land-use planning negatively, villagers in all three project areas, which face serious land-use pressures, have found that planning can help minimize conflicts.

- In the North Gokwe and Negande areas, SUPCAMP has identified some management options, including safari hunting, problem animal management, and game fence management. In Mazoe, safari hunting, fence management, fire management, and water management systems are in place. Non-consumptive tourism, project planning and development, and financial planning, and budgeting are being developed in all three areas.

- All three areas have at least three monitoring systems in place: problem animal reporting, fence monitoring, and hunt return analyses, and financial monitoring is under way in all three areas. Analyses of animal numbers, abundance, trophy quality, hunt effort, and poaching are monitored and evaluated for use in the annual quota-setting.

- Five training manuals on various aspects of wildlife management have been produced, distributed, and tested, with funds from the US Fish and Wildlife Service (USFWS) and SCI. Subjects include problem animal reporting, electric fence projects, marketing of safari hunting, safari hunting, and quota-setting.

- SUPCAMP staff have contributed to the development of M&E methodologies for CAMPFIRE and by extension for NRMP II. Monitoring of sport hunting will be a component of these procedures, as will the SUPCAMP financial/economic monitoring and the NRMP II-funded Multi-Species Project (MAPS) aerial surveys.

Conclusions

The SUPCAMP project is well-designed and documented. Its structure and execution, which are based on participatory activities, are constantly undergoing re-examination and modification, based on experience and observation, in keeping with adaptive management principles. SUPCAMP activities have focused on three CAMPFIRE areas that are fairly representative of other ones with considerable wildlife resource potential. The techniques being perfected in these well-studied areas may then be applied to other areas as they express a need and support becomes available.

Recommendations

WWF should promote the SUPCAMP approach within CAMPFIRE but not at the expense of perfecting it in the pilot areas. Because it is a demand-driven service, continue to inform the districts and wards of the range and utility of SUPCAMP activities. Doing so may allow other CAMPFIRE areas to benefit from the project, which may be expanded appropriately as funding and institutional capacity permit.

USAID and the CA, through the CDF, should assure continued funding of this critical component, as the funds from CAMPFIRE revenues may not be adequate to support it. Use NRMP II funding to complement, not replace, other donor funding. Consider whether the regional RCSA might contribute to this area (see Section III. B. 3. g).

Evaluation Issue: Problem Animal Reporting and Control

Although zebra, buffalo, and other ungulates can be involved, most of the problem animals are elephants that raid fields in the wet season when the crops are nearing maturity. Some stakeholders at the ward/village levels complain that baboons cause considerable damage and that professional hunters and their clients do little to help because baboons are not of interest as a game species. Buffalo are believed to be carriers of foot and mouth disease, and considerable measures (fencing and culling) have been taken to separate them from livestock. WWF has developed a consultant study of this problem.

Findings

Policy Issues. PAC is an important issue to CAMPFIRE because of its impact on villagers' attitudes toward wildlife conservation and its direct effects on animal populations. It poses a challenge to CAMPFIRE stakeholders and is a complex subject that is constantly being debated at various levels. Theoretically, no PAC should be necessary within 5 km of the boundaries of the National Parks because the law forbids settlement in this zone. However, some areas around the parks have settlements up to the park boundaries, and these areas are highly prone to disturbance by animals.

There is considerable variation in how problem animals are treated from place to place and over time. In some areas, responses by the DNPWLM to problem animal reports have been less than adequate. In other areas, the wildlife monitors employed by the RDCs, in concert with agents from the wildlife department, deal effectively with them. Some RDCs have instituted effective systems to compensate residents of wards containing wildlife for losses to their crops and/or livestock. It is thought that this policy promotes positive attitudes toward living with wildlife in communal areas. Other districts prefer not to offer compensation for losses to avoid potential abuse of the system.

Some Department officials have stated that the Rural Districts are responsible for preventing animal problems from getting to the point where the animals must be killed, but this goal is not always adequately accomplished. These officials also stress that the DNPWLM will authorize the killing of problem animals only when they exceed the district's annual quota, but any animal below the agreed upon quota can be shot either as a trophy animal by a hunter or as a PAC, a matter the Rural Districts have the power to decide.

Some DNPWLM officials express concern that a potential for abuse exists whereby aspiring professional hunters attempt to shoot animals under the guise of the PAC to meet their licensing requirement of having participated in five hunts of dangerous game. Some officials support a ban on shooting trophy animals as PAC to avoid potential abuse.

WWF strategy suggests that a PAC agent should be hired at times of the year when problems are likely and that the wet season PAC should be marketed as part of the district's quota. It is emphasized that a reduction of the PAC quota may increase community revenue, and if an agreement with a safari operator can be reached, the PAC agent can transfer the revenue from the marketed PAC hunt directly to the VIDEO that suffered the crop or stock losses.

The DNPWLM ended the prior PAC quota because of abuses. Current department policy requires that problem animal complaints be directed to the DNPWLM Provincial Warden, who may choose to allow District officials to handle a certain situation and/or may dispatch an agent to observe the process.

Administrative Issues. Reporting of problem animals by some wildlife-containing districts to Harare is adequate, but in others, the levels of reporting are less than desirable. WWF has developed a problem animal report form (PAR F1), a reaction request form (PAC F2), and a PAC report form (PAC F3) to capture information and communicate need. SUPCAMP teaches problem animal reporting and has developed a handbook to assist people in dealing with problem animals.

Implementation Issues. Often the standard means of frightening offending animals (e.g., noise, lights, fire, or shooting over the backs of crop-raiding animals) eventually prove insufficient to prevent a recurrence. Research to develop non-lethal ways (e.g., use of irritant spray and acoustic systems) to deter elephants is underway in Zimbabwe, and preliminary results are promising.

In North Gokwe in the late 1980s, approximately 44 problem animals per year were reported shot. After inception of WWF's efforts to improve problem animal reporting and offer other management possibilities, in 1992 the total decreased to 3 animals shot for control, and in 1993 2 animals. Many observers view this tendency as evidence of the potential to minimize problem animal conflict if available strategies are adopted. (However, it should also be noted that animal populations in general decreased at that time because of a serious drought.)

Conclusions

Problem animal reporting and control are important issues that can either promote the goals of wildlife conservation or demoralize people who are subject to wildlife-induced life or property loss. Similarly, it can reinforce or undermine Appropriate Authority.

The extent and nature of the problem are often the result of increasing human settlement and subsistence agriculture, particularly in places where elephants traditionally move during wet season migrations or during times of environmental stress. Improved land-use planning and effective district or ward by-laws may be effective tools in minimizing such conflict.

Progress is being made in dealing with problem animals in most areas. This is particularly important in light of the inherent increase in human-wildlife conflict as human populations grow and wildlife habitats diminish. WWF's efforts to promote enhanced problem animal reporting and awareness of

alternatives to shooting are effective in many areas and have the potential to help in others. Workshops, information manuals, and discussions of problems encountered by the various wildlife wards are employed to exchange information and provide feedback for an adaptive management strategy of dealing with problem animals and human-wildlife conflict.

Recommendations

Support more research into non-lethal means of PAC, such as using recorded sounds and improved delivery systems for irritant sprays. This is a logical area in which animal welfare groups can make a constructive contribution to the people-wildlife issues in Zimbabwe.

The CA and DNPWLM should jointly sponsor a workshop that encourages local involvement in PAC. Formal meetings of the various stakeholders should be held to discuss and resolve the problem of unclear or inconsistent policy regarding PAC.

The DNPWLM should institute a legal requirement that problem animal reports be completed and give the responsible parties in each Appropriate Authority compliance training. The DNPWLM can spot check conditions surrounding the shooting of problem animals, particularly elephants and lions, and particularly in areas where abuses are suspected.

Conduct more research into settlement planning on communal lands that have problem animal conflicts. Although difficult to accomplish in a practical sense, land-use planning and properly designed and maintained wildlife fences can provide effective long-term solutions to PAC.

Have the CCG examine the SUPCAMP results for possible application in other areas: habitat monitoring; monitoring of lesser game; and resource conflict resolution. These are key areas for all CAMPFIRE communities. WWF should systematically engage in training in these areas, coordinating the effort with new partners who bring overlapping expertise.

Evaluation Issue: Electric Wildlife Fence Projects (Ecological and Practical Considerations)

Findings

In some CAMPFIRE areas, human-wildlife conflicts are serious threats to crops, livestock, and positive attitudes among villagers regarding wildlife. The trend toward increasing human settlement in some areas brings with it increased risk of problem animal incidents. Research by WWF and others indicates that fences, if properly studied, designed, and maintained, can be an effective management option for reducing human-wildlife conflicts. This is important to a program such as CAMPFIRE, which relies on the good will of villagers living in close contact with wildlife.

Many villagers and district officials interviewed in the field feel that electric fences are the best solution to PAC. However, they often complain about delays in getting approval for proposals for fences under current CAMPFIRE procedures. The CA appears to be a vocal advocate for building

fences in affected districts. Some areas have effective electric fence projects, such as that carried out by the Mastiche Ward Wildlife Committee (with NRMP I funding). Fence menders are employed under CAMPFIRE to inspect and repair electric fences. The WWF's project training manuals and workshops provide CAMPFIRE stakeholders with valuable information about the financial, practical, and ecological considerations of fences.

The downside to fencing is that large-scale fencing is expensive, occasions the most environmental change, and is least likely to be maintained without subsidy. Elephants often learn how to avoid or knock down fences, rendering them ineffective, and electric fences are not effective against some nuisance animals that are small and able to burrow under them (e.g., porcupines, spotted hyenas, and warthogs). Other animals are able to go over the fences (e.g., baboons and vervet monkeys). Some fences are poorly designed, patrolled, and maintained. Electric fences are ineffective unless the necessary degree of care is taken to keep them intact and operational. This work is often arduous and requires an a priori understanding by the communities as well as a realistic commitment of manpower and funds to accomplish.

Because of difficulties in the proposal writing process and, in some cases, insufficient study of design considerations, no new fences have been built under NRMP II.

Conclusions

Electric wildlife fences are expensive in comparison to the damage elephants do to crops. Moreover, although the technology is simple, the fences require rigorous study and design, and elements of the fencing systems are vulnerable to theft and damage. Inadequately designed fences may have negative effects on elephant migrations, which are necessary to the well-being of herds, particularly in times of nutritional and water stress. If a fence cuts across wildlife migration routes, its location may cause long-term management problems. It is not always clear that communities have the ability and willingness to maintain electric fences once in place. The evaluation team observed a number of broken down or poorly maintained fences. Finally, electric fences and PAC treat the symptoms of problem conditions and not the root causes, such as habitat loss and fragmentation, competition for space, inadequate land-use planning and settlement policy, and climatic stress.

Recommendation

The key ingredients of successful design and implementation of electric fences as a management practice need to be studied. Caution should continue to be exercised in authorizing new fence projects and in promoting fences as a panacea for human-wildlife conflicts. Avoid building unrealistic expectations on the part of villagers that will ultimately prove negative to the CAMPFIRE Programme.

Evaluation Issue: Ecological Monitoring of Wildlife and Habitat -- Aerial Surveys of Wildlife Populations

Findings

Aerial surveys are essential to wildlife management in the National Parks, parks estates, and CAMPFIRE areas. In the case of elephants, the surveys provide data on the numbers, distribution, and movements of elephants and are essential to quota-setting and other wildlife management considerations. The surveys are also somewhat useful for buffalo, although the clumped distribution of this species often leads to extremely wide confidence intervals. Their application to smaller species, such as impala, is very limited using current statistical analysis methods.

At the same time, aerial surveys are time-consuming (accounting for up to an estimated half of the principal WWF pilot's time on an annual basis), dangerous (a crew was lost in 1994), and physically punishing (long hours of flight and cabin temperatures sometimes reaching 52° C). They were once the responsibility of the DNPWLM, but its ability to provide aircraft and pilots has diminished considerably because of damaged/lost equipment and staffing constraints (as noted in the DNPWLM reports). The WWF team has assumed much of the responsibility of late, particularly in the CAMPFIRE areas, but the effort is still collaborative, involving personnel from both WWF and The DNPWLM. The surveys are a burden for WWF, however, and its staff argue that, under present circumstances, the "only sustainable option is to encourage NGOs, The DNPWLM, and RDCs to subcontract this service to the private sector."

Conclusions

The evaluation team concurs with an analysis by Dr. Ian Douglas-Hamilton of the current aerial survey techniques and data, done in the run-up to the CITES convention in 1997. He concluded that the system was an effective means of providing data for management of Zimbabwe's elephants, stating that Zimbabwe possesses "one of the best sets of elephant data in the world." Currently, however, the DNPWLM does not have the capacity to conduct extensive aerial surveys. Resumption of this responsibility would allow it to fulfill its mandate on a national level. A study to determine the feasibility of establishing an Aerial Survey Specialist Unit within the DNPWLM may be desirable.

Some of the new statistical methods for treating aerial survey data (i.e., Unsworth et al., 1994) might be appropriate for Zimbabwe. They involve using an index to correct for the differential visibility of certain species in various habitats and cover types. Any modification of the statistical analysis or survey techniques must, however, be made in such a way that the newly-acquired data and analyses are comparable to the existing aerial survey database. Similarly, other new technologies, such as GPS-referenced digital aerial videography, might be appropriate and would provide a greater range of options for dealing effectively with the growing need for expanded and more precise coverage, particularly for smaller species (e.g., greater kudu and impala).

Recommendations

The status of the Cessna 206 purchased under NRMP I should be pursued to secure a replacement aircraft as soon as possible. The condition of the two Cessna 336 aircraft the United States gave the DNPWLM should be evaluated and their potential for remote sensing of environmental and habitat conditions and use for the CAMPFIRE aerial surveys assessed. In the short term, USAID should continue supporting WWF efforts to meet CAMPFIRE's aerial survey needs.

The applicability of the recently developed statistical methods and technologies for use in aerial surveys in Zimbabwe should be assessed.

Evaluation Issue: Wildlife Habitat Evaluation and Monitoring

Findings

The loss and fragmentation of wildlife habitat are the most serious threat to conservation in Zimbabwe. The ecosystems around the protected areas are becoming fragmented because of a number of factors, including population growth, poverty, unequal representation, inadequate planning strategies, and compromised market systems. (Metcalfe 1995) Unfortunately, once an area has been associated with some form of human-specified use, it becomes increasingly difficult to allocate the land to more restrictive patterns of use, such as those dictated by wildlife management. (Guyer and Richards 1996) The underlying causes of human-wildlife conflicts are habitat loss and fragmentation, increasing human populations in rural areas, competition for space and natural resources between humans and wildlife, poor or no land-use planning and settlement policy, and climatic stress. These problems are likely to continue throughout the country unless steps are taken to deal with them.

Metcalfe (1995) made some general recommendations for CAMPFIRE regarding the importance of considering physical realities (forage, variation in stocking rates, competition with livestock, and the fragmentation of ecosystems) in designing management systems. However, as is the case with the community-based conservation programs in Zambia, no organization is conducting extensive analyses of the ecological impacts of CAMPFIRE in Zimbabwe (Marindo-Ranganai and Zaba 1995). Although various stakeholders gather data on biological systems and the physical environment, no one is systematically monitoring habitat changes across the whole country or even across the CAMPFIRE areas. The money to do so for CAMPFIRE is, however, available.

The DNPWLM has shelved its previous plans to do this monitoring. WWF is currently planning to help CAMPFIRE examine the options to meet this need. The parties have agreed to the terms of reference for an expert consultancy and are waiting to carry them out. Coordination with the FC and The DNR, each of which is involved in environmental monitoring, had not taken place at the time of this evaluation.

WWF has produced an excellent database from the hunt return forms. Although reporting percentages could be higher, and this database and the aerial survey reports have some inconsistencies, abundant information is available that can help address a number of important management-related issues, including the monitoring of trophy size, fulfillment of the hunting quotas for various species by district or nationally, handling of problem animals, and financial return from hunting. The tables in Appendix L of this report illustrate a few of the useful outputs that can be derived from statistical analysis of this database. The hunt report database is currently in dBase format but can easily be translated (using systems such as DBMS Copy) to other common spreadsheet formats (e.g., MS Excel or SAS) to permit a far more detailed analysis than the hunt program currently provides.

Institutions outside Zimbabwe are working on the design of environmental monitoring systems. For example, several university programs and conservation organizations (e.g., Conservation International) are currently developing low-cost systems using high-resolution aerial photography and satellite imagery for wildlife conservation applications. The National Aeronautics and Space Administration (NASA) will shortly initiate the first-ever scientific assessment of the environment in southern Africa. Working with universities and other partners in the region, NASA will employ satellite and ground-based surveillance to study land-use changes.

Conclusions

Without ecosystem-level monitoring and evaluations that test the assumptions and hypotheses of CAMPFIRE's community-based conservation initiatives, it will become increasingly difficult to draw conclusions that are consistent with the program's adaptive management model. Several measures can be taken to address the loss and fragmentation of wildlife habitat. One is to develop a systematic monitoring program that can quantify and qualify changes in environmental conditions. Better land-use planning, greater devolution of authority to local levels, and improvement of macroeconomic conditions are needed to help address the problem. Well-written district and ward by-laws may also be effective tools. A few already exist, but more emphasis and refinement would help move instruments away from the restrictive, control-oriented "model by-laws" the RDCs often use. The CCG may be able to collaborate with some of the institutions outside Zimbabwe that are involved with environmental monitoring to meet CAMPFIRE's objectives.

Much of the necessary data-gathering can occur at the local level using trained monitors. Remote sensing information such as satellite imagery, aerial photography, and digital videography would also be useful. Data layers such as soil and hydrological maps, vegetation composition, and climatological data would be extremely helpful if incorporated effectively in a spatially-based monitoring system.

Recommendations

A CCG working group on habitat monitoring should be created.

An augmented effort should be made to develop an effective strategy for monitoring key environmental variables as they relate to wildlife habitat changes and conditions, land-use patterns, and baseline environmental variables. To allow for funding constraints, the monitoring could be carried out in selected areas representative of common conditions throughout the CAMPFIRE areas, particularly those whose proximity to protected areas permits controlled experiments as described above.

Execution of the proposed technical consultancy should be accelerated. This and the follow-up design and implementation phases of a monitoring program are critical steps in the process. The relevant subcommittee must agree on the important variables to be monitored, which ones will be the responsibility of the stakeholders, and how the data are to be stored, analyzed, and interpreted. Follow-up on previous work, in particular, needs assessments, community aspects of monitoring, and the cost-effectiveness of various methods, should be carried out.

The support for WWF's Geographic Information System (GIS) should be continued/expanded. Priority should be given to the storage of existing environmental data in an efficient GIS. This effort needs to be coordinated with other GIS activities in Zimbabwe of relevance to CBNRM. USAID may want to involve Famine Early Warning System (FEWS) in this effort.

Improvements in the environmental impact studies of settlement patterns and proposed projects such as boreholes, dams, and fences should be emphasized. Studies on human-wildlife conflict (e.g., Hoare and Mackie 1993) should be supported and expanded.

In light of the constraints of funds and personnel, strategic collaboration should be sought with appropriate outside organizations to further the environmental monitoring work required for CAMPFIRE.

Evaluation Issue: DNPWLM and WWF Performance within NRMP II

Findings

The DNPWLM is the statutory authority responsible for wildlife in Zimbabwe. The major force behind the creation and definition of CAMPFIRE, the Department has been a principal player throughout the Programme's history. The DNPWLM currently employs approximately 2,400 staff throughout Zimbabwe. The CCG was originally formed under the coordination of the DNPWLM.

The Department is charged with a number of activities that are essential to the functioning of the CAMPFIRE Programme. These include review and approval of hunting quotas, participation in aerial and ground surveys of animal populations, training of CAMPFIRE wildlife monitors, poaching control, PAC, participation in quota-setting, applied research, fish culture projects, and participation in various meetings and technical training workshops.

Through its CAMPFIRE Coordination Unit (CCU), the Department is charged with providing: guidance on all wildlife matters; monitoring and implementation of the Programme and financial flows; assisting the RDCs in setting quotas and enforcement; program-related ecological and economic research; representation of CAMPFIRE in the international arena; coordination of DNPWLM park planning and management activities with participating neighboring communities; and assistance on some aerial surveys.

Since 1992, DNPWLM has been less actively involved in CAMPFIRE implementation "The slowing down of the Department's pace within the programme has been partly due to extensive change in:

- management (probably priorities and variations in opinions and beliefs)
- structure
- staff turnover
- ministerial composition
- CAMPFIRE activities are demanding. It "is thus a programme which requires a team specifically for the programme with a full support in decision making, technically, availability of equipment, etc."

(National Parks and Wildlife NRMP II Annual Review/Progress Report, August 1996-February 1997, as revised February 1998).

CCG members are encouraging more active DNPWLM involvement. Its latest workplan relating to NRMP II details six outputs, as summarized below :

Output 1: Legislative and administrative framework facilitated. The Department assigns policy reviews to people at high levels who are not involved in program implementation, do not have field experience, and do not respond in timely fashion. The CCU believes it should be delegated responsibility for policy reviews.

Output 2: Training provided to RDCs and The DNPWLM. A full-time training officer is needed to coordinate training for the RDCs. The CCU's ability to address the training issue is hampered by the provision that USAID funds can be used only for its own operations.

Output 3: Fisheries management capacity developed. Funding problems delayed start-up, and the lack of a second vehicle has caused transport difficulties. Nevertheless, according to the CCU, the DNPWLM identifies potential dams monthly, has stocked 5 fishponds and visited 20, and has contacted 13 communities about the project. It is leveraging other donor support.

Output 4: Wildlife habitat monitoring. This activity is partially completed but suffers from a shortage of skilled staff and the lack of a second plane and trained pilot for the habitat monitoring. Still, some aerial surveys have been conducted. Among the CCU's suggestions are replacing the survey airplane, providing a wildlife survey team for some areas, and setting up a vegetation monitoring unit immediately.

Output 5: Restocking of wildlife in depleted areas. Staff shortages, the high prices for wildlife, a ban on live animal translocation, and the change in department status to a fund have slowed restocking.

Output 6: Project management. This has been achieved through meetings at various forums. The CCU's lack of recognition and insufficient staff, equipment, and transport are obstacles. to implementing the workplan. The CCU commented that little action is being taken on the obstacles to its participation in the Programme.

***Conclusions** (see also the prior sections on aerial surveys, quota-setting, and PAC)*

CAMPFIRE is an interdependent entity whose success is determined by the degree to which all players fulfill their obligations. It is essential that the DNPWLM have a role in the Programme. Even though USAID has made funds available, the Department has been unable to take advantage of those resources to move forward with its CCU. The impact of the Department's diminished role affects other stakeholders, particularly WWF, and the general program. Most of the constraints appear to be of internal origin.

A redefinition of the Department's role, in light of present constraints and future capabilities and needs, would help in planning for the future. It needs to address the CCU, which is having difficulty operating without a defined mandate and decision making powers. Improvement in the level of communication between upper management in the DNPWLM and WWF, which must collaborate with the Department (e.g., for the aerial surveys and quota-setting), is also essential to assuring efficient CAMPFIRE operations.

Recommendations

Translocation and live animal sales activities should be re-initiated. Current DNPWLM policy on live animal translocation must be re-examined. Absent a general policy, specific proposals should be put on a fast track review on a case-by-case basis.

Strengthen DNPWLM field activities and encourage broader re-engagement of the DNPWLM in the CAMPFIRE Programme. Ways should be sought to reinvigorate the involvement of the DNPWLM in the CAMPFIRE Programme, and to provide far more decision making within the Department. To build on and systematize the current pilot fisheries activity, a master plan for CAMPFIRE involvement with artisanal fisheries should be developed and implemented. PAC, quota-setting, and other DNPWLM CAMPFIRE-related administration should be further decentralized. Finally, a study of how the DNPWLM could facilitate devolution of Appropriate Authority or aspects of it below the RDC level should be conducted.

Evaluation Issue: World Wide Fund for Nature (WWF)

Findings

As a founding member of the CCG, the Zimbabwe Office of WWF is responsible for providing a wide range of ecological and economic services to CAMPFIRE under WWF (MAPS). This project has produced a considerable number of documents relevant to CAMPFIRE and other environmental and conservation issues. The workplan was linked to two other WWF projects: the completed Study of Agro-Pastoral Systems in the Zambezi valley and the SUPCAMP project, which is ongoing.

The NRM-WWF MAPS project, funded by USAID, performs essential technical services for the CAMPFIRE Programme. A description of the project and work plans were developed at CAMPFIRE CCG workshops in 1992, March 1993, and June 1995. The workplan was revised in November 1997, and quarterly progress reports have been submitted, most recently for the period of December 1997 to February 1998. The immediate objective of the MAPS project is "Improved technical knowledge available at all levels, including policy levels, to manage, use, and benefit wildlife and other natural resources in wards with the CAMPFIRE areas." Based on this objective, five outputs have been identified, which are summarized below along with a brief review of progress:

(1) Monitoring, including aerial surveys of large mammals in CAMPFIRE areas and monitoring of performance and relevant management and marketing data. Annual large mammal surveys were conducted as planned, analyzed, and reported in collaboration with personnel from the DNPWLM, and the results disseminated for use in quota-setting. Recording protocols were established, databases (financial, hunt return, NP9, POMS, and GIS spatial components) were designed, and various analyses on hunting quotas and trophy quality were made.

(2) Technical assistance to the RDCs for the implementation of CAMPFIRE development projects. The RDCs were apprised of the services available from WWF, a consultant pool was assembled, and some ecotourism studies, wildlife management planning, and environmental reviews were undertaken.

(3) Resource surveys and feasibility studies as requested by RDCs. Consultants and WWF staff were deployed or planned for a tourism potential survey, RDC resource survey, and ecotourism study, and a feasibility study was completed for small-scale ostrich farming.

(4) Research and decision support systems (DSS) at the Rural District level. The WWF GIS database was extended and consolidated into a single meta-database. Progress was made on components of the NRM DSS simulation models, labor analyses, and derivations of patterns of settlement from aerial photographs.

(5) WWF project management and implementation capacity. Appropriate accounting and procurement systems were established, and WWF participated in the Annual Review of the NRMP II.

Conclusion

WWF provides essential services to CAMPFIRE. Its work on publications, skills transfer, participatory data-gathering projects, and devolution of responsibility are key ingredients of CAMPFIRE. The WWF training component, some portions of which were curtailed because of a funding shortfall resulting from the effects of inflation on the Zimbabwe dollar, has been an efficient means of transferring the necessary skills. The commitment and professional vision of WWF staff have been integral components in the success of CAMPFIRE, and the need for the leadership and technical competence of this organization is likely to remain high and even to increase as the Programme develops and expands.

Recommendation

Given WWF's demonstrated effectiveness in establishing and achieving its CAMPFIRE goals, its activities should receive continued support, and the WWF training component should be reinforced.

Evaluation Issue: Impact of CAMPFIRE on Wildlife and Habitat, Key Assumption Number One -- Wildlife Resources Are or Will Become Adequate to Sustain Commercial Exploitation

Findings

A valid and urgent question in the CAMPFIRE context is whether the wildlife resource is adequate to provide sufficient commercial returns to assure the engagement and long-term support of local communities. The evidence from various sources indicates that in many CAMPFIRE areas with long-standing CAMPFIRE activities, particularly those in the Zambezi valley, the wildlife resources are sufficient for sustained commercial exploitation. The evidence is less clear or unavailable in other places where CAMPFIRE activities are incipient and in places where wildlife populations and their habitat are inferior.

Most observers consider the hunting quotas in CAMPFIRE areas to be conservative. The maintenance of wildlife of trophy quality and the overall numbers of wildlife suggest that their populations are being sustainably exploited under present conditions. However, mortality factors attributable to catastrophic occurrences are important considerations in estimating sustainable harvest levels. Natural die-offs (as experienced in some areas in Zimbabwe during the early 1980s) are common among wildlife populations, with as much as 65% of a population being affected (Barrett and Arcese 1995). This factor must be included when developing adaptive management models.

There are adequate secondary indicators of exploitation (e.g., those that reflect current commercial practices) in the form of data on trophy quality, wildlife numbers, distribution, and subjective observations from stakeholders in the field. These indicators appear to be sufficient to permit continued wildlife exploitation and other management actions, particularly if applied in an adaptive management framework.

Conclusions

Wildlife management is a complex process containing biological, ecological, economic, and social elements. Integration of these factors into a comprehensive, scientifically sound, and sustainable system of research is desirable if the conditions within which species exist are to be understood and conclusions about the sustainability of commercial exploitation of wildlife made with an acceptable level of certainty.

Comparative analyses of game and cattle ranching impacts have shown that environmental stability increases when ranch land is dedicated to wildlife (e.g., Berwick and Faeth 1995). Monitoring these ecological impacts is essential, as even low levels of degradation have been shown to have deleterious effects on population dynamics (Doak 1995).

Even though consumptive use is considered ecologically sound, it is still necessary to attend to concerns regarding the impact of harvesting not only on target species, but also in terms of possible associated effects a cropping scheme might have on ecosystems (Kremen et al.,1994). Game-cropping schemes can have considerable potential for positive ecological impacts based on the increased amount of habitat being maintained for wildland systems, and also have the potential to support the conservation of endangered species (Hill 1994).

***Recommendations** (see also the section on wildlife habitat evaluation and monitoring)*

In the short term, the level of reporting and completion of the hunting forms and surveys must be improved. In keeping with adaptive management, meetings or special working group sessions should be held to determine field-based mechanisms for assessing populations and trends for lesser species.

In the longer term, one approach to answering the questions posed by assumption #1 is the Population Viability Analysis (PVA). PVA is a computer modeling technique that can identify those parameters having the largest influence on reproduction and population dynamics (Possingham et al.1993). Although individual models differ in their assumptions, they are primarily based on Leslie matrices and age/stage structured population information, and have the advantage of being able to incorporate the potential effects of catastrophic change (environmental and disease), genetic erosion, and population structure (e.g., meta-populations) (Mills et al.1996).

Emphasis should be placed on commercial exploitation of and creation of value for lesser species such as impala. Local/regional sport hunting, subsistence hunting and local butcheries, live animal sales, and game viewing are possible mechanisms through which to accomplish this.

4. Improving Coordination

Improved Programme coordination and improved communication are issues that need to be addressed at every level. The growing number of participating institutions makes the need more urgent. The following section reviews CAMPFIRE (CCG) institutional interrelationships. If institutions, and the people who make up these institutions, are to collaborate, they must share certain common goals and some ownership of the results and achievements. This section also reviews the impact of key CAMPFIRE individuals within their institutional settings. The role of USAID, the most important donor and source of financial support to the various institutions promoting CAMPFIRE within Zimbabwe, is evaluated in terms of its impact on program coordination, local ownership, and the long-term sustainability of CAMPFIRE's impressive achievements. The topics discussed below include:

- CAMPFIRE Collaborative Group;
- CAMPFIRE Association;
- Project Execution Team;
- USAID SO1 Core Team;
- Institutional Contractor; and
- Regional communication, cooperation, and coordination.

Key unresolved issues include (1) coordination of the CAMPFIRE movement, (2) coordination of the NRMP II support effort, (3) financial accountability throughout the movement, and (4) coordination of CAMPFIRE with regional activities and donors.

Evaluation Issue: CAMPFIRE Collaborative Group (CCG): Past and Future Role. *"The CCG, originally the driving force in defining the goals, tenets, and policy direction of the CAMPFIRE Programme appears to have lost much of its impetus. ..Explain the primary reasons for this development. What are the potential consequences of this 'loss'? Have alternatives emerged which can replace the Programme policy advisory body? What should be the role of the CCG in ongoing Programme operations? What, if anything, should be done to promote the long-term renewal of the CCG?" (SOW B-2-c) "How effective have implementing partners been in instilling a sense of* ***Programme ownership*** *among participating RDCs? improved responsiveness and accountability to RDC and community customers?" (SOW C-3-b) "To what extent does USAID's relationship with its NGO partners cause problems in ownership, defining the roles/responsibilities of the various implementing agents and in determining future directions for CAMPFIRE? What, if anything, should be done to improve relationships among all Project partners (expanded team members) in the future?" (SOW A-6)*

Findings

The CCG is a Zimbabwean creation comprised of the organizations active in defining, applying, and promoting the CAMPFIRE principles. Over time, new organization have joined the group. Currently, the active members (the early members appear in bold) and their key functions include:

CAMPFIRE Association	Program coordination, policy, communication
Dept of National Parks & Wildlife Management	Policies for wildlife management
Ministry of Local Government & National Housing	Policies for local governance
Zimbabwe Trust	Training, capacity-building, institution-building
ACTION Magazine (a sub-unit of ZimTrust)	Environmental education
Centre for Applied Social Sciences	Applied field, sociological research, some policy
World Wide Fund for Nature	Biological monitoring, training in quota-setting
Africa Resources Trust	International advocacy, public relations,
Department of Natural Resources	Policy coordination, land-use planning
Forestry Commission	Woodland management, participatory approaches
Southern Alliance for Indigenous Resources	PRA, woodland management

A foremost issue affecting the CCG, as noted, is the differences of opinion among the partners as to who should be doing what, as well as disagreement as to what constitutes coordination vs. control and to what extent "control" has any place. These disagreements appear partially to revolve around access to monetary control and the power it gives to build a constituency. They are also the result of the perception that the CA identifies itself as CAMPFIRE within Zimbabwe. This situation acts as a disincentive to potential private sector and NGO partners involved in the greater CAMPFIRE movement, as they believe they can apply CAMPFIRE or CBNRM principles without being "led" by the CA.

Some of the tension can be traced to the decision to use NRMP II to reinforce the CA as the lead CAMPFIRE agency, and to allocate substantial funds to build its capacity. This move seems to have altered the pre-NRMP II CCG interrelationships and responsibilities and upset the relative positions of the actors within CAMPFIRE. The relationship between the CA and ZimTrust is an obvious example. The CA emerged from ZimTrust's shadow as the lead agency, with considerable project resources and a mandate to expand its capacity in areas of responsibility (e.g., training and technical assistance) formerly (and exclusively) within ZimTrust's portfolio. On the other hand, the CA has complained about ZimTrust's direct project line to USAID.

For its part, ZimTrust feels that USAID/Z wants to move away from the wildlife emphasis in CAMPFIRE because of the political fallout. It sees wildlife as Zimbabwe's niche, its comparative advantage, which all must push to use in the most sustainable manner. ZimTrust is also critical of the direction of NRMP II, feeling that the project has developed a management and institutional infrastructure and project delivery process that are both unnecessary and unsustainable. ZimTrust is also concerned about the roles that other CCG members play in CAMPFIRE, especially the passive involvement of the DNPWLM and MLGNH. It sees the CA as seeking to subsume certain functions, such as technical assistance and training, formerly within its portfolio, and views the PET process solely as a USAID project delivery mechanism that lacks justification in terms of promoting or sustaining CBNRM in Zimbabwe.

Instead of effective leadership and coordination by the CCG, the evaluation team saw several instances of intra-CCG squabbling over decisionmaking prerogatives and access to project resources. This conflict may reflect, in part, historical disagreements among the CCG members, but the team believes it also reflects the absence of clearly delineated CCG roles and responsibilities and firm CA leadership in bringing about the needed sense of shared ownership of CAMPFIRE implementation.

The implementing partners have been successful in instilling a sense of ownership among the participating RDCs -- to the extent that they consider themselves to be CAMPFIRE. The workplans of these CCG members have been responsible to the beneficiaries' demands for services, although the demand is frequently larger than the institutional capabilities to deliver.

The CA has created, with its partners, a Customer Service Plan (CSP) intended to address customer satisfaction with the services provided. The plan is still only in rough form and has not yet been fully implemented. In addition, information is not shared adequately among partners.

Conclusions

The evaluation team came to three main conclusions about the CCG. (1) Its partners are not working in a truly collaborative manner. Intra-CAMPFIRE rivalries produce tensions that are difficult to channel constructively. However, with the increasing influence of the CA, program coordination under NRMP II's broader support has been much better thana it was under NRMP I. (2) The strength of the CAMPFIRE movement in Zimbabwe will ultimately depend on the ability of current CCG members to draw in new member institutions with greater ranges of expertise and sector diversity. It must not be seen as an "exclusive club," where wildlife interests are the only "game" in town. (3) The CAMPFIRE Programme, as a Zimbabwean initiative, should continue to be "owned" by institutions promoting and articulating CAMPFIRE principles. Shared philosophy and produce are the basis of the CF movement and form a network of institutions. The CA, as the central institutional CAMPFIRE partner within the Zimbabwe CCG network needs to use this lead role in the Zimbabwe CAMPFIRE movement to spearhead Programme coordination, national advocacy of CAMPFIRE principles through its RDC constituency, and championing of the needs for policy reform.

Recommendations

The CCG should sponsor an annual gathering of its members to discuss CAMPFIRE management. Such a meeting should follow the CA's Annual General Meeting and should focus on tailoring services to meet guidance given by the Board of Management. This meeting would eventually replace the NRMP II annual workplan reviews.

The CCG should be a voluntary organization and not have specific implementation ambitions. It should not, for instance, seek funds in its own name to achieve some project. Rather, its purpose should be to:

(1) Analyze problems and exchange views on the strengths and weaknesses of how CAMPFIRE principles are applied in the field, and recommend to its members non-binding strategic shifts in activities, missions, and purposes;

(2) Use the combined networks of each CCG member to support each other's work and troubleshoot problems in the field as they emerge, and promote CAMPFIRE principles nationally among other organizations interested in CAMPFIRE ideas.

As the organization that most represents the local constituent base of CAMPFIRE Rural Districts, the CA should continue to chair future CCG meetings. The members with the greatest proven experience and competence in a subject area should, however, be delegated by the CA to chair the CCG subcommittees in those areas (e.g., policy and M&E). The rationale for sub-committee chairmanship would change over time and therefore should be reviewed as part of the annual CCG meeting agenda.

NRMP II, Support organizations in the CCG, and District-level personnel (CAMPFIRE coordinators) need to spend more time linking local communities with other Zimbabwean private and informal sector institutions interested in sustainable NRM ventures within CAMPFIRE Districts. NRMP II CDF funds should be used to support design and write-up of promising ventures that can provide economic returns to village- and ward-level communities or groupings. Those ventures can then be submitted for bank loan funding.

The significant support given to capacity-building should be continued. However, the institutions providing the support should have an exit-policy plan for the specific support being given. Institutionalization of specific capacity development within the RDCs, as well as at lower levels, should be a priority as a potential incentive for the RDCs and CA to seek continued support from these institutions in other domains.

To promote improved responsibility and accountability among CCG partners, the RDCs, and community customers, there should be more joint proposals from individual CCG members and RDCs. The evaluation team proposes a new approach to CDF grants to encourage such joint partnerships.

To improve relationships among all NRMP II partners, the PET as it currently operates should be eliminated and a new Plan of Operations created and sanctioned by the BRC. To this end, the team suggests a facilitated workshop for the CA Board, regional representatives, CCG members, other government partners, USAID, and the IC.

Evaluation Issue: CAMPFIRE Association Performance. *To what extent is the Association's Secretariat responsive to the aims/objectives expressed by the Association's Board of Management? To what extent has the Association been successful in defining and fulfilling/meeting its roles and responsibilities to its increasing number of members? To what extent is the CA likely to be sustainable as USAID assistance decreases over time? What should be the ultimate role of the CA?*

Within the remaining implementation time-frame, what, if anything, should be done to promote the CA's long-term sustainability? (SOW A8)

Findings

Advocacy, Information, Communication. As an RDC organization, the CA's core business is advocacy of RDC interests in CAMPFIRE. Although CA rhetoric argues that it represents local communities, its interest may not always coincide with the interests of subdistrict groups and organizations, and it has made insufficient actual movement in their direction in this field activities. It should be possible for full membership in the CA to be extended to ward-level economic interest groups to become full members and advocates of CAMPFIRE and their own particular interests within their districts.

Policy. The CA has articulated clear policy positions but is not addressing the policy issues affecting the CAMPFIRE movement aggressively enough, including the development of positions on legislation and policy changes that could help to move CBNRM interests forward. Policy dialogue is an example of an important program goal that, ,for the most part, the CA has not achieved. Only recently has the PET subcommittee met to discuss a policy agenda and task committee members with follow-up responsibilities. No concrete action has been taken on certain items, such as extending Appropriate Authority beyond wildlife, even though these issues have been on the CA agenda for several years.

Monitoring and Evaluation. There is some concern, based on experience, whether the CA can achieve its M&E objectives. Hurungwe, one of the earliest RDCs to embark on CAMPFIRE (in 1992), experienced a delay in the start-up of grant-related activities (until January 1997) that risked quashing its initial enthusiasm. The CA organized M&E courses "...was not well grasped because it has fewer practice examples and more theoretical examples." These statements, albeit limited in scope and depth, when joined with RDC comments about problems with communication and coordination, raise the general issue of the CA's capacity to implement and sustain its current agenda of activities successfully.

Management Capacity. Recent evaluations note that, with the close assistance of the IC, the CA has recently developed the management capacity to use resources efficiently and ensure accountability. The CA leadership also brings a solid base of experience and commitment. The Board has made it very clear that it has delegated executive operational authority to the Secretariat and that it will review progress with the Secretariat on a quarterly basis. The CA's Secretariat appears to be responsible to its Board, although perhaps not sufficiently so. There is a risk of the CA becoming just another "Harare NGO." The Secretariat is heavily involved in a number of key issues, including follow-up to the CITES convention issues, and preparation of input into discussions on new legislation concerning the devolution of mineral rights to districts. To date the Board expresses satisfaction with progress.

Senior staff in the MLGNH have a varying understanding of the intermediary role played by the CAMPFIRE Executive Director. They have expressed concern that "...[he] is more aligned with the CCG than with the Association (i.e., the RDCs) and does not represent the interests of the RDCs. Rather, he represents the interests of the CCG members." Others who work more closely with the CCG have developed a genuine appreciation for Executive Director's success in achieving in the difficult task of balancing the interests of all parties -- the CA Board and constituency, the NGOs in and outside the CCG, senior staff, and technical departments (especially the DNPWLM) of the MMET, the MLGNH itself, and the various donors and outside parties. Moreover, they "sympathize with his ideas" and point out that in representing the communities, he has sometimes taken strong stands in his efforts to coordinate NGO interventions. Differences in position with NGOs notwithstanding, the MLGNH encourages the Executive Director not to push his partners too hard, arguing that to be successful, "he must make himself popular."

The CA, through the RDCs, WADCOs, and VIDCOs, has permitted the increased politicization of CAMPFIRE down to the lowest levels. Some RDCs are open to experimentation and delegation of some authority for some innovative NRM ideas. The current management structure favors the status quo in institutional arrangements. The team's field work underscored the vastness of Zimbabwe's geography and the difficulty of attempting to be an effective on-the-ground presence while based in Harare. Comments from the field highlighted the fact that the CA is seen as effective at the national level, but less so at the district, ward, and village levels.

The point about overextension reflects the evaluation team's observation that the CA is trying to do too many tasks in too many areas, and as a result not doing some important tasks effectively.

The CA is over 90% dependent on USAID funding, which funding is scheduled to end in the year 2000. Additional Netherlands funding is likely, but not guaranteed at the time of this evaluation. Other future donor support is likewise not a sure thing. In sum, the CA has only approximately 2-2.5% of its post-2000 funding either secured or in negotiation as of March 1998. The Association has begun to explore other sources of support.

CAMPFIRE Coordination. The CA has taken over as the lead institution in CAMPFIRE. With PET and IC support, it has permitted money to be channeled to the field, although the process has been very slow and bureaucratic. While the CA Secretariat has developed a capacity to handle USAID money for its own support grant, it has not developed the financial management capacity needed to play a central role in assisting its members in meeting the financial management and reporting requirements of, for example, the CDF or GOZ.

The CA does not have a particularly strong presence of program support staff "on-the-ground," although this is understandable given the institution's relative youth and limited personnel. It is

represented on the ground principally by the District Councilors and CAMPFIRE coordinators, many of whom have only recently been hired with CDF support. Data on this issue were hard to find since the team found no in-depth evaluations of CA implementation activities in the field. There are some limited observations on this issue in the four CASS draft mid-term evaluations of CDF grants (Nemarundwe, 1998; Mid-Term Evaluation of the Mazowe Rural District Council CAMPFIRE Project; Mid-Term Evaluation of the USAID-Funded CAMPFIRE Programme in Chipinge; Mid-Term Evaluation of the Hurungwe Rural District Council). These draft reports depict the Association as playing somewhat of a remote and, at best, limited role in coordinating CCG activities in the RDCs.

Box 10. CAMPFIRE Association Issues

Strengths

- Lead agency recognition
- National and international visibility
- Effective program advocacy
- Staff skills and experience
- Recently acquired management capacity

Limitations

- Inadequate communication with RDCs and other CAMPFIRE partners
- Ineffective program coordination
- Inability to establish an on-the-ground presence for implementation
- Overextension in activities inappropriate for its skills and capacity

Conclusions

The CA has strengths and limitations that should be recognized and that should guide recommendations. Its long-term strategy underscores the institution's rapid evolution, but, because it does not adequately build on its strengths, it does not appear sustainable. It is still too early to tell if this institution will be able to take the difficult steps needed to reorganize and refocus as USAID assistance decreases.

The CA is still stuck at the RDC level. It has performed well at increasing RDC membership and involvement but has not been as successful as it would like in fulfilling its roles and responsibilities to its increasing numbers of members at the ward and village levels. This suggests broader institutional constraints to becoming more inclusive. Fore example despite Dutch efforts to assist the CA in opening its membership beyond RDC, its constitution remains one for the "CAMPFIRE Association of Rural District Councils."

Through the PET, through significant training and the IC's technical assistance, and through the CA's role in reviewing and promoting the CDF program, NRMP II has assisted the Association in assuming its current leadership role and responsibilities. The GOZ and CCG agencies totally accept CA's leadership of the CAMPFIRE Programme. However, they would like the relationship to be more collegial and less adversarial.

As the lead agency, the CA Secretariat is sometimes seen as the exclusive torchbearer of CAMPFIRE principles, but the development and expression of program principles is properly shared among all partners including CCG members, the Board, communities, and supportive government agencies. Figure 1 shows a proposed model for CA's future. It depicts CA as the lead agency, working

collaboratively with its CAMPFIRE movement partners. The CA still *represents* CAMPFIRE, but it focuses and concentrates on program advocacy and policy dialogue. It can draw upon the skills and capacity of its partners on an "as needed" consultant basis. For example, since effective policy dialogue requires sound policy analysis, the CA might commission a policy analysis from CASS that would set the agenda for and inform the dialogue with ministry management and staff.

The proposed model envisions the CAMPFIRE partners as a voluntary association of movement leaders. This association will organize itself as the individuals' interests and initiatives dictate. As donor support declines, its membership will determine its purpose and activities and decide how the association will support itself. Presumably the association will harbor an internal reservoir of appropriate skills that can be tapped by tendering to meet CAMPFIRE needs. The principle implication of these changes from the status quo is a greater fluidity in membership and in all likelihood a leaner and more flexible and cost-conscious CA.

The proposed model includes Resource User Groups (e.g., ecotourism associations, forestry products associations, associations of fish farmers, and other economic interest groups) that would play an important role in commercial enterprise development in CAMPFIRE areas.

The CA is in a very precarious position regarding its financial future and needs to be weaned gradually from dependence on USAID funding.

Recommendations

USAID should fund only those CA activities that show promise of sustained good performance. It should support CA's Harare-based activities in two specific areas: program advocacy and policy dialogue. *Program advocacy* includes national and international initiatives aimed at informing individuals and groups about the CAMPFIRE movement and promoting a positive, constructive image of the movement. The CA has carried out this activity well in the past. Effective advocacy will require using the most current and appropriate communication technologies (e.g., Internet and multi-media presentations). *Policy dialogue* requires proactively engaging policymakers in discussions of important policy issues of direct relevance to CAMPFIRE, with the intent of promoting the passage of sound legislation. It should also include dialogue on regulatory matters pertaining to the implementation of existing laws. The CA should strengthen its policy advocacy skills, which it has the resources, such as CASS and ART, to draw upon.

The CA should become increasingly responsive in representing the policy needs and directions of its most rural constituents at the village and ward levels, as it is beginning to do now at national and international levels. CAMPFIRE's success in identifying itself with the most local levels (village and ward) will define its ultimate role within the country.

To promote CA's long-term sustainability, the Association should be placed on a financial support phaseout plan. The plan should enable the CA to refocus its activities and gradually diversify its base of financial support. A number of options should be considered (see the last chapter of this

report). One option might continue CA funding at its current level (100% of salaries) through the end of FY1999, followed by a 50% reduction for FY2000. Because of the key lead role the CA plays, the team believes USAID support should continue at this reduced level through FY2002 if possible (see Table 14).

The CA should consider strongly advocating with its members to distribute a maximum of the wildlife revenues to the producer communities and should publish an annual report that discusses the nature and level of RDC revenue distributions and factors affecting them. Such a report would also serve as a means of documenting new diversified sources of CAMPFIRE revenue.

Evaluation Issue: The Project Execution Team (PET). *"Under NRMP II, the Project Execution Team (PET) is the key Project implementation coordination and decision making body. How effectively has the PET functioned in Project planning, implementation, coordination, and communications? What, if anything, should be done to improve PET performance in the future? What is the relationship between PET and the CCG? What should this relationship be? What, if anything, should be done to promote coordinated PET-CCG operations in the future?"(SOW C-3-b) "How effective have the PET sub-committees (e.g. monitoring/evaluation, training, information/ communication, etc.) been in planning and coordinating inter-agency activities? What, if anything, should be done to improve PET sub-committee operations and effectiveness in the future?" (SOW C-3-b)*

Findings

The concept of the PET emerged at a plan of operations workshop in 1994 involving various CAMPFIRE partners and USAID. USAID agreed with the CCG on the need to maintain a high level of Zimbabwean ownership for the Programme, and also saw value in establishing a mechanism to coordinate and deliver funds through the CA more effectively to what was defined as the CA's *primary customer base* -- the RDCs. The intention was to give the RDCs some control over the nature and timing of the services to be delivered to them through CCG partners. It is not clear why these functions were not initiated as part of the then-CCG functions. One reason may have been that the members of the CCG were perceived as not being best positioned to develop the felt need for increased indigenous representation. If there was to be support for the CA to assume the role of lead agency within CAMPFIRE, then it might have seemed appropriate that the CA "control" PET from the beginning. USAID has had a strong voice in the PET.

The SARP NRMP II project document states that "no project specific steering committees or other special management structures will be established to guide project implementation, allowing project management to focus on strengthening CAMPFIRE institutions and structures for maximum relevance and sustainability of program interventions and accomplishments." (SARP,1994:33) There is no mention within the project document of an entity similar to PET.

In practice, PET has become just such a "steering committee." At the time, the CCG was not providing much overall guidance or direction to the program. By default, PET took control of the

Programme's coordination and PET effectively managed to pull things together so as to move NRMP II activities forward, to "get things done." For the same reason it formed the various subcommittees (e.g., policy and M&E). From an implementation perspective, PET accomplished many things: it enabled the "expanded project team" to work better than ever before, helping the CCG partners to focus and begin working together toward common objectives, rather than individually; it was successful in launching NRMP II activities; and it supported the CA in building up national-level representation and activities, helped strengthen it, played an important role in helping the CA establish itself firmly as the CAMPFIRE lead agency. PET has also been successful in pressuring WWF and CASS to be more responsive to RDC support requests and PET-perceived needs (such as support requests, non-lease tourism studies, and CASS evaluations of RDC projects).

The IC's project documents refer to PET as the CCG/PET, an entity that was "to have duties of convening meetings, coordinating CCG support for CAMPFIRE, and enhancing communications between implementing partners." (DA Quarterly Report #8, 1998) In reality, PET ended up replacing the CCG, although that was *not* the intent. It functioned as the CA/PET, with even larger ambitions. PET did not strengthen the CCG or improve its partnerships. The activities that came to be included under PET were initially intended to be guided by the CCG. However, the pre-NRMP II CCG did not function as a CAMPFIRE coordinating group, as intended. Even to this day it has remained a loose affiliation of Programme partners, without any real institutional cohesion or voice, which is perhaps has one of its greatest shortcomings. Each NGO has had its own agenda and timetable. Their programs have been driven not by customers, but by institutional goals. In short, leadership did not come from the CCG itself, although most of its members had a voice on the PET.

The CA and the IC share adjacent offices. This arrangement has certainly facilitated the IC's providing support to the CA, but it may have contributed to the CA's inclination to become the manager of the NRMP II CCG partner grants and the CDF. The CA's chairmanship of the PET reinforced this tendency.

The NGO partners are generally critical of PET. One major criticism is that USAID structured the NRMP II for its "administrative convenience," instead of in a way that is optimal for CAMPFIRE. They cite the PET mechanism as an example of this bureaucratic mechanism -- while it may be useful for USAID/Z, it does not promote efficiency, effectiveness, or sustainability in project administration. USAID and the CA believe that the NGO resistance stems, instead, from a generalized resistance to having their activities coordinated, reviewed, and subject to external oversight.

Conclusions

PET has served its initial purposes. It has succeeded in the important function of making it possible for USAID NRMP II program funds to be delivered to the target customers, the RDCs. It has provided training and capacity-building for NRM, particularly of wildlife, among scores of wards throughout Zimbabwe, an important achievement. It has permitted greater coordination, communication, and support for the CA's lead agency role, as well as more efficient administration of USAID funds.

That said, PET no longer responds to the realities of the CA and the general CAMPFIRE movement within Zimbabwe. Although it achieved greater coordination of CCG partner institutions, it may have done so at the cost of the evolving role of the CCG within the CAMPFIRE Programme. Clearly, the CCG is weaker today than it was five years ago. It is also true the CCG was not providing a great deal of overall leadership and coordination five years ago.

The CA has begun to use the PET as a means of exercising greater control over its CCG partners. Those not invited to a PET meeting are "out of the loop" on what is going on. Given the importance of the CDF funds and their management within PET -- and the eventual delivery of services to CAMPFIRE Rural Districts and wards -- this situation effectively limits the input from general CAMPFIRE partners. There is a need for other donors and non-USAID-funded CCG partners to have a program-wide mechanism for addressing CAMPFIRE.

Recommendations

Since USAID is going to graduate Zimbabwe within the next five years (and perhaps end funding for the NRMP II even sooner), it needs to begin relaxing its control of the project *now* and to avoid micro-management. Doing so will defacto relocate project control and authority with Zimbabweans, who eventually will have to assume complete program responsibility. Some of PET's current functions should be returned to USAID direct management or delegated to the IC so as to remove the CA from direct program implementation, grants management, and training. Insteadit should rely more on its CCG member partners within the shared CAMPFIRE movement.

USAID's current PET activities should be replaced during the "winding down" phase of program funding (1998-2002). USAID should not plan for more than one NRMP II planning meeting a year with its project implementers *at the CCG level.* At that time, it should review the contracted SOW objectives and results and propose, accept, or reject modifications. USAID's core team should not be involved in the current weekly and monthly PET review of implementation activities, a practice that led some CCG members to see USAID as micro-managing. The evaluation team recommends that, during this period, the CA Board's chairman begin to serve as chairman of the CCG. For the rest of the year, implementers should not be required to participate in further NRMP II organizational meetings. Twice yearly meetings may be held to *communicate* results, field findings, issues, resolutions, and lessons learned, and not for programmatic changes. The latter should be done in small break-out subcommittees, not large plenary sessions.

PET subcommittees, such as policy and M&E, should be transformed into CCG subcommittees.

Evaluation Issue: USAID SO1 Team: Flexibility and Adaptive Design. *"To what extent has USAID adopted managerial changes which make it more flexible in its dealings with its local NGO partners?" (SOW A-6) "To what extent has this design approach (i.e., flexible design approach) allowed implementers to adjust their plans/budgets to meet changing circumstances? To what extent has it allowed implementers to learn from their experiences and incorporate their lessons learned within future work plans?" (C.2.b)*

Findings

USAID's core management team is intensively involved and informed on all aspects of the Programme through its NRMP II funding and PET involvement. The USAID core team exerts considerable influence over the NRMP II program direction, partner discussions, and internal reviews. It has been an important advocate of the Programme in Zimbabwe, including to outside critics of the program, and can claim credit for some of NRMP II's successes over recent years. All parties appreciate the fact that USAID/Z has been instrumental in securing, increasing, and protecting the funding for NRMP II. USAID/Z staff fought hard and successfully for the project during a time of heavy scrutiny and criticism. USAID's commitment to the project is sincere and acknowledged.

USAID NRMP II has helped to strengthen the subregional governing units that are closer to the interests of local populations and communities, and has supported decentralization within Zimbabwe. Under NRMP II SO1, USAID has defined "benefiting communities" within CAMPFIRE as "either villages, wards, or RDCs receiving USAID support, either directly or through its agents." (SO1 Document, April 1997:15) However, the RDCs are the lowest level of civil government within Zimbabwe. They receive this kind of support because they have been called "the only game in town" and because they have the Appropriate Authority for wildlife program development within their boundaries. Overtly supporting village- or ward-level communities without "passing through" the RDC, whether done by a local NGO or even a government institution, is seen as unnecessarily creating "parallel structures." (Appendix L for USAID Zimbabwe SO1 Results Indicators)

In the ULG mid-term evaluation, USAID/Z was urged to adopt a more flexible management approach, one that minimized micro-management and burdensome controls. USAID/Z sought to do so under NRMP II by adopting adaptive management principles that emphasize efficiency and effectiveness over a stifling adherence to bureaucratic protocol. These principles were intended to provide guidance when requested and implementer latitude when appropriate. Tools such as annual planning, quarterly reviews, and planning workshops have been employed.

Most of the NGOs in CAMPFIRE are experienced in adaptive management principles. Examination of their work plans revealed familiarity with strategic planning concepts and practice. They gave evidence of being experienced in setting out objectives and planning the necessary outputs to reach them. USAID appears to have encouraged this practice. Most of the CAMPFIRE partners have the capacity to plan strategically and adjust to fluid circumstances. Implementers appear to be capable of adjusting their plans/budgets to some degree as circumstances dictate. The use of the annual work plan as a tool to revisit their strategy (e.g., objectives and outputs) facilitates changes (with the necessary approvals). USAID appears to have encouraged this behavior.

Conclusions

One of USAID/Z's greatest achievements has been the sustained support and interest the mission has given this important conservation project for the past 10 years. It has been a key reason for the significant achievements of NRMP II and CAMPFIRE overall, and is testimony to the importance

of long-term, sustained support to achieving results. However, it must be pointed out that the real success has been in the area of sustained wildlife conservation and management, a domain that had a ready, built-in world market. Initiatives in other, non-wildlife domains, without such evident markets but nevertheless with great potential, are only just beginning. The success of sustainable CBNRM in these other areas will also depend on continued, long-term support, if not by USAID, then by other donors.

Because the USAID core team does not have field implementation responsibilities, it must be careful not to overstep its coaching and support to the program. The partner institutions themselves are ultimately accountable for the results for which they have been contracted.

Although the flexible implementation approach practiced through reengineering permits easier mid-course corrections at the program management and oversight level (in Harare and in the PET), it can cause confusion among program implementers in the field. Changes in direction or focus always take considerable time and energy to implement at the field level. When changes occur too frequently, field programs can become cynical and resentful of "wasted" efforts, undertaken to meet a donor's needs. An example is the SO1 "M&E indicators," which have gone through a range of modifications and data collection efforts. The effort made to develop, modify, and collect data to respond to these indicators has in some cases increased the information-collecting burdens of the project.

Recommendations

Greater latitude and accountability should be given to NRMP II grantees to make decisions and mistakes, and to learn from them. As recommended by reengineering proponents, USAID should expect its grantees to set clear and realizable performance objectives and outputs, and then give them the time, as needed, to accomplish them without further discussion and evaluation.

USAID/Z should practice "results management" with those partners possessing the requisite management capacity. It should place the implementation responsibility squarely on these NGO partners and then hold them accountable for results and avoid micro-managing. USAID/Z should adopt more of a results-focused project management style: namely, provide maximum discretion to the CAMPFIRE partners to implement the project, and confine USAID/Z staff time to verifying the results and holding the project implementers accountable for specific results. The results achieved should determine the resources received. This approach requires initially setting clear, mutually accepted project objectives.

In future assistance agreements, USAID should require matching funds from each NGO partner up to 50% of the operating budget recommended in this evaluation, so as to move local ownership of the CAMPFIRE movement back where it belongs and to further sustainability of the program. This approach will reduce the current overdependency of the CCG and the Programme in general on a single donor.

A mechanism should be developed that spreads the remaining NRMP II funds out over a greater period of time that extends well beyond the anticipated end in August 2000. This change is particularly necessary because many RDCs are just initiating alternative (to wildlife) NRM activities. The remaining funding should focus less on infrastructure and more on continued capacity-building and training at the ward and village levels. The remaining funding and training should focus on support for the development of viable income-generating, CAMPFIRE-linked, bankable micro-enterprise proposals.

Evaluation Issue: The Institutional Contractor. *"Discuss the role and impact of the project Institutional Contractor in regard to USAID's implementing more flexible managerial changes in its dealings with its local NGO partners." (SOW A6).*

Findings

The IC for NRMP II, Development Associates/Price Waterhouse, signed its contract with USAID at the end of September 1995. The IC has worked closely with the CA to develop and expand its capacity to assume the leadership role entrusted to it under NRMP II. By August 1996, the CA had developed an organizational structure and staffing, and submitted a draft long-term grant proposal to USAID. The grant was approved in October 1996. (Garcia: 1997:14)

The IC has taken on the role of managing certain aspects of the NRMP II project on behalf of USAID. Its activities include: participation on the PET; semi-annual assessments of the CA in its role as lead agency for CAMPFIRE; administration and management of grants to the CA and its RDC members, as well as to CASS and WWF; financial oversight for selected NRMP II grantees; and "in-service training programs relating to the management of USAID funds, the general management and administrative capabilities of the CA and its RDC members to insure program sustainability beyond the life of the project." (DA Quarterly Report, 1998) The IC has been asked to transfer its oversight and management role with the CDF to the CA. The grant funds to be administered amount to US$10.4 million, out of the $13.85 million USAID contract signed in September 1995.

The delay in the IC's arrival, combined with other factors treated elsewhere in this report, has resulted in slower spending rates by grantees and RDCs than expected. CDF grant funds have been available to CAMPFIRE districts for two major purposes, as noted: institution-building/infrastructure; and RDC capacity-building. Delays have been experienced in reviewing and awarding capacity-building projects, but a total of 20 grants have been awarded to date, the last in February 1998. With respect to the RDC infrastructure grants, 26 pre-award surveys have been completed, but progress has been slow in awarding the actual grants. The delays have been attributed to a slow learning process for the CCG and the RDCs around proposal development and review. Moreover, in general there have been problems with the infrastructure proposals, which have not contained the information (e.g., on financial viability, economic soundness, and management) required to make informed approval decisions.

The IC's pre-award surveys of the RDC proposals have indicated that the reimbursement method of grant payment is necessary. While this system has created some legitimate difficulties for grantees, its basis appears sound.

The IC's financial staff are in an excellent position to support the RDCs in their review and identification of the audit-related problems associated with CAMPFIRE accounts. The MLGNH provides free audit services, which could assist the RDCs in meeting their annual audit report requirements. The RDCs are still getting financial systems in place that will allow them to better meet the requirement to submit to annual audits required by law. MLGNH has thus limited resources to carry out costly audits and has programmed available audit funds accordingly. The IC's efforts have already helped bookkeeping for CDF grants in the context of RDC budgets. The IC might be able to help RDCs to meet regular audit requirements, so as to further transparency in financial accounting.

Conclusions

The IC has performed its tasks well and carried out its responsibilities with professionalism and fairness. Its record-keeping has been excellent, and its contributions at meetings relating to PET activities have been thoughtful and useful to the execution of NRMP II.

The IC has played a major role in building the CA's capacity, particularly in terms of financial management. It has been effective in increasing the CA's capacity to manage its resources and account for them according to USAID requirements and regulations. Price Waterhouse's pre-award assessment of the CA recommended that the IC continue this close assistance and oversight role with the CA. CA/CCG grantees continue to need limited assistance from the IC to execute their project administration responsibilities successfully. The RDCs will continue to need technical services and training in this area.

It was an early NRMP II strategic mistake to integrate the CA so closely in the decision process for allocating CDF funds It is not useful for the CA to be strengthened as a grant-maker, nor would it have been appropriate given the inherent conflict of interest. This responsibility is also very time-consuming and program-intensive and could only distract the CA from its self-defined principal objectives. It would also place the CA in charge of judging the merits of awarding grants to its own constituents; an neutral but knowledgeable third party would promote higher standards of competition for limited funds.

The professionalism behind the pre-award RDC surveys is unquestionable. However, the standard used may be higher than necessary.

The strengthening of the financial management capacity of the CA was done well and has been very useful to the CAMPFIRE Programme. New CCG grantees could benefit from similar assistance if such services could be extended, in a light-handed way, to them.

Recommendations

The IC should play a key operational role in overseeing the transfer of the CDF to a post-NRMP II institution.

- Current efforts to give the CA a role in the CDF grant-making should be discontinued. CDF funds are best managed and granted by an independent entity, as discussed above.

- The IC should set up a semi-autonomous, professional grant-making unit (described earlier). This unit would then be transferred to an independent intermediary organization. When setting this unit up, the IC will have to assess its current staff configurations and capacity in light of its expressed role in the CDF and make adjustments as needed.

- The current senior management team of the IC should play a facilitating and oversight role in setting up this CDF unit, serving as proxy "trustees" of the sinking fund while allowing the grant management team to serve as the "intermediary grant-maker," as described earlier.

- The IC staff should analyze their pre-award survey method and the rules for determining who can get partial advances, although the idea of strengthening and testing RDC financial management capacity through the reimbursements method seems to be working, even if slowly. Only one RDC, Tsholotsho, has qualified for small grant advances because of its proven ability to manage funds and provide receipts for reimbursement. Other RDCs can qualify for advances once they show similar financial management skills. The goal of such analysis should be to make it somewhat easier to qualify for a partial advance on a grant, especially for grantees that do not have sophisticated accounting systems. The principles of financial control can be adapted to extremely simple book-keeping systems to allow for greater use of the partial advance system of paying out grants, all without risking misappropriation of grant funds. Many non-USAID donors elsewhere have found ways to simplify the pre-award survey process, and IC staff should be encouraged to think through the problem and actively propose simplifications. With this in mind, it may be worthwhile for IC financial staff to look into the system used by the embassy's "self-help" grant program for ideas or into the rules developed by USAID-PACT in Madagascar.

The IC should coordinate with USAID to eliminate, transform, and phase out PET functions and organizational structures.

- USAID should continue IC assistance to the CA as necessary and in a timely manner, until the CA demonstrates a full capacity to carry out all of the necessary administrative tasks (e.g., financial reporting, progress reporting, and coordination) incumbent on the CAMPFIRE lead agency.

- The RDCs should be encouraged to take better advantage of MLGNH's free audit services, as well as the IC's capacity to provide some support for identifying ways to improve financial

management and reporting. The IC should actively meet with and share information with WWF staff charged with data collection and analysis of CAMPFIRE revenue.

- The IC should provide financial management advisory services to a wider variety of new CCG partners that may become recipients of USAID funds in the next few years. The method suggested here is to use the power of information to strengthen and motivate, rather than exerting direct control. This might be done by issuing bi-annual "report cards" for the main CCG grantees, using a checklist to score and rank the presence and quality of internal procedures and managerial systems.

The IC should assist CCG grantees to shift to new grant criteria involving matching fund requirements. In light of the expanded tasks proposed for the IC in this evaluation report, the IC should review its capacity and the likely demand for its services over the next few years, in terms of the scenarios presented at the beginning of the report.

The IC should complete execution of the current CDF grant pipeline and continue to exercise oversight over grants allocated under the current criteria. Between now and the end of FY1999, CDF funds should be sufficient, beyond what has already been spent, to finance two new projects under consideration (including the Veld project), and at least five capacity-building projects with new RDCs -- for a total of about $850,000. The team does not recommend financing expensive game fences out of this fund (a 100 km. fence can cost up to several hundred thousand dollars). Based on the CDF level proposed for the years following FY2000, and if placed in a sinking fund to extend for about 10 years, the CDF funds expended would not exceed $425,000 per year and would go for many small grants to a wide range of new, and old, CCG partners (Table 13).

Evaluation Issue: Regional Communication, Cooperation, and Coordination

CAMPFIRE and the Southern Africa region. *"Has regional cooperation/coordination improved under NRMP II? Zimbabwe's component of NRMP I was expected to benefit from its linkages to the broader SARP initiative, yet the first evaluation reported little tangible progress toward reaching regional consensus and program synergy. If so, to what extent has the NRMP II and CAMPFIRE benefitted from and/or contributed to improvements in regional-level cooperation/coordination? What, if anything, should be done to improve the NRMP II's contribution to regional level cooperation/ coordination? What, if anything, should be done to improve the Regional NRMP's contribution to the achievement of NRMP II specific objectives?"* (SOW A-3)

Findings

A Congressional directive that USAID support elephant conservation initially led to USAID's regional initiative in CBNRM. That directive coincided with the 1988 Sustainable Wildlife Utilization workshop held in Gaborone, Botswana. The outgrowth in terms of USAID field activity took shape under the SARP-NRMP, which tested sustainable use as a means of conserving elephants and other wildlife in three pilot countries -- Zambia, Botswana, and Zimbabwe -- and gave Malawi, which has

the lead role for SADC in NRM, a coordinating role. With regards to Zimbabwe and CAMPFIRE, the important point is that a defined conservation approach *already* existed, to which USAID lent support, consistent with its testing of its CBNRM precepts. In Phase I of the Zimbabwe NRMP, nearly the entire US$7.6 million authorization was expended, at a time when the context and conditions framing elephant conservation efforts were undergoing rather dramatic changes at the international level.

When elephants were given CITES Appendix 1 status and Zimbabwe began lobbying (unsuccessfully in 1992) for a reversal, the regional concern with elephant conservation under the project was no longer the central issue (the ban was considered by Congress as addressing the need to do something to promote elephant conservation). The amended SARP project paper showed a distinct shift toward national concerns (and more direct bilateral program management) and away from pilot interventions toward more general institutionalization of CBNRM. Although wildlife utilization and the capture of revenue remain central, the conceptual shift, in both Zimbabwe and the other country programs, was clearly toward multiple resources and diversification of revenues.

New CBNRM programs in neighboring countries adopted CAMPFIRE principles but not necessarily its initial elephant focus, and certainly not its historic particularities, such as the Appropriate Authority mechanism. Regional sharing of common and differing experiences and the drawing of lessons have become a major aspect of the regional program. Under the reorganized regional office, diversified CBNRM approaches became a focus in and of themselves.

The USAID RCSA has given new impetus to regional and transnational NRM, and regional linkages and consensus are beginning to emerge. The program synergy that was lacking in the previous mid-term evaluation is now visible and growing. The 1995 regional NRMP conference in Kasane, Botswana marked a turning point, substantiating the fact that a shared Southern Africa perspective on CBNRM was emerging. (Rihoy, ed. 1995) In the past few years, the RCSA has refined its mission and launched an important regional support project, NETCAB. NETCAB, which began in late 1995, helps reinforce capacity-building among NRM activities by strengthening networking. It also supports: start-up of the World Conservation Union (IUCN) Southern African Sustainable Use Initiative; CITES TRAFFIC compliance monitoring (although Zimbabwe was judged not to need outside assistance in this area); NGO networks; and various regional-level workshops, for example, in ecotourism. As does the regional component of the NRMP, NETCAB also supports cross-country visits by persons at all levels -- decisionmakers, technical staff, NGOs, and community-based organizations (CBOs)/individual producers. These appear to have been highly successful.

Zimbabwean NGOs provide the technical assistance team that implements the regional NRMP. The RCSA-financed consortium of WWF, the IUCN, and ART has assisted the USAID/Z Mission in carrying out strategic planning, and it has contributed to CAMPFIRE by supporting regional activities such as the successful seminar tour by various CBNRM participants to the United States and Canada, and the realization of a theatrical production on the theme of community-based conservation.

CAMPFIRE has had a regional impact in many other ways. Key individuals coming out of the CAMPFIRE movement have taken on important roles in regional organizations. One early CAMPFIRE pioneer now directs a conservation-based community development project in Zambia. One student of Professor Murphree plays an important role in Mozambique's Tshuma Tshata, a local initiative in community-based NRM. It is opening the way for policies and legislation that are being developed in that country. The Agency's Biodiversity Support Project/BIOME was able to use ART and the IUCN Sustainable Use Specialist Group (headed by important CAMPFIRE founding figures) to carry out international visits.

Conclusions

Collaboration between the regional program and national activities such as CAMPFIRE have improved significantly in the several years since the last mid-term evaluation. Synergy between similar CBNRM programs is developing across countries. Shared objectives and agendas are strengthening individual programs. Other programs, for example, have learned from CAMPFIRE's strengths -- its principles, commitment to empowerment, and strong adaptive management approach to wildlife and program coordination -- and from its weaknesses -- the limited degree of devolution, the constraining policies that make change difficult, and the rigidity imposed by the very strong focus on a single resource. With regard to the USAID role, progress has been limited by available staff and management time the RCSA has been able to afford.

Through involvement in neighboring programs, trained and experienced CAMPFIRE practitioners have shortened other countries' learning curves in designing and implementing their programs. The lengthy experience with CAMPFIRE provides the foundation that is permitting CCG members (e.g., WWF and ART) to shift to regional roles. Zimbabwe's presence at regional NRM fora can sometimes be overpowering to smaller and less mature programs in neighboring countries.

Observing the more rapid progress in other countries' programs in recent years has driven home the point that CAMPFIRE is relatively blocked or frozen; some have even argued that it is emerging from a period of backsliding. This team concluded that this exposure has made CAMPFIRE more open to constructive criticism and change.

Recommendations

NRMP II NGOs in the CCG should continue to expand their regional roles and ties but not at the expense of CAMPFIRE and CBNRM in Zimbabwe.

The CA should request RCSA assistance in accessing the lessons of devolution and working with CBOs and local-level producer communities. This assistance could involve workshops and exchange visits for the CA Board, District Council executives, and others, including CBOs themselves.

The team recommends expanding the continuing ongoing relationship between the RCSA and CAMPFIRE, even prior to NRMP II completing its phaseout plan.

The RCSA should explore with the NRMP II IC what role the RCSA could play as the CDF is transferred to an independent grant-making entity. At a minimum, the RCSA will be able to bring in wider regional and international experience with sustainable conservation finance, and possibly can assist the independent body with technical support in preparing and reviewing post-NRMP II CDF grant proposals.

The RCSA should assist lead figures in the CAMPFIRE producer communities and at higher levels of the CAMPFIRE movement to play technical assistance roles in neighboring programs.

The RCSA should take the lead in defining an appropriate USAID role in supporting southern Africa regional states and NGO concerns in advocating national and regional positions on important policy and economic issues related to wildlife and other resource management and use.

IV. DEVELOPMENT AND MANAGEMENT

A. Devolution and Issues of Appropriate Authority

Evaluation Issue: Ownership of CAMPFIRE at the National, Rural District Council, and Lower Levels. *"How effective have implementing partners been in instilling a sense of Programme ownership among participating RDCs? To what extent are the implementing partners' work plans responsive to beneficiaries' demands for services? To what extent has an effective Customer Service Plan been put in place to monitor RD clients' level of satisfaction with the services being provided to them by each of the implementing partners? What, if anything, should be done to promote improved responsiveness and accountability to RD and community customers?" (SOW C-3-b) "To what extent does USAID's relationship with its NGO partners cause problems in ownership, defining the roles/responsibilities of the various implementing agents and in determining future directions for CAMPFIRE? What, if anything, should be done to improve relationships among all Project partners (expanded team members) in the future?" (SOW A-6)*

Findings

The essential "owners" of the CAMPFIRE movement within Zimbabwe are the rural communities and their elected representatives at the RDC level. Sustainable management of their natural resources, both renewable and non-renewable, and their socioeconomic well-being are the focus of efforts by the CCG and NRMP II/SO1.

Although a fundamental principle of CAMPFIRE is cooperation and partnership in the pursuit of sustainable management of natural and other indigenous resources, there appears to be more competition than partnership among some CCG institutional partners. One source of this tension is, as noted, differing access to and control of donor money, and the power and support it provides to building a constituency. Moreover, it is not always clear what the focus of the CA, a very young organization, will be, and whether it will rely on government, private, and NGO partner institutions to provide technical support and training.

Conclusions

All institutions adhering to CAMPFIRE principles should have a stake in the ownership of the Programme. The competition and uncertainty over the position of the CA are deterring some private sector organizations and NGOs from joining or fully supporting the CCG partnership. Some think they can apply the CAMPFIRE principles on their own and do not have to be "led" by the CA.

That the RDCs wish to claim "ownership" of CAMPFIRE through their CA is a very positive development, and should permit supporting institutions to play more of an advisory and technical support role to the growing CAMPFIRE constituency. However, it would be a mistake to downgrade CCG members to a status of simple providers. Their vested interests go well beyond that.

Collectively, the CAMPFIRE partners have an impressive range of skills and experience that can lead the Programme well into the next century. The CA's challenge, to successfully fill the coordination role to which it aspires, is precisely to enhance the CCG members of shared commitment and ownership of the Programme, which is larger than any single organization.

Recommendations

The CA, as the lead agency within the Zimbabwe CCG network, should, through its RDC constituency, exercise its leadership vigorously by advocating nationally for CAMPFIRE principles and continuing policy reforms aimed at the devolution of sufficient authority over natural and other indigenous resources to local communities.

CAMPFIRE collaborators, NGOs, the CA and its RDCs, and government agencies must put past differences behind them and begin truly collaborating to reach their common goal of further devolution.

Evaluation Issue: Devolution of Appropriate Authority and Bottom-up Planning.
"To what extent has the NRMP II/CAMPFIRE taken steps to further devolve authority over indigenous natural resources below the district level? To what extent have RDCs adopted a more bottom-up approach to identifying, planning and implementing Project/Programme activities? What has been done to promote increased devolution/control of CAMPFIRE financial benefits to producer communities? What if anything should be done to promote a more bottom-up approach?" (SOW, A7) "CAMPFIRE theory proposes that authority for NRM should be devolved to the 'most appropriate authority.' Is the current level of devolution of authority appropriate for the resources being managed under CAMPFIRE? Does the current focus on Rural District Councils (RDCs) as 'Appropriate Authorities' limit the achievements of CAMPFIRE's community development objectives? Does it limit CAMPFIRE's movement into community-based management of other, non-wildlife, and indigenous resources? Review, assess, and discuss realistic alternatives to CAMPFIRE's current devolutionary approach towards CBRNM, using examples, where appropriate, from other similar programs." (SOW, 4-B)

In the Mid-Zambezi, during the early CAMPFIRE movement (1989), personnel carried a slogan on their shirts that read, "Putting the last first." That slogan derives from the concepts for devolution of authority developed by Robert Chambers, who said:

> With secure tenure and rights to land, livestock and trees, farm families tend to take the long view and invest in sustainable agriculture. Without it, they take the short view and environmental degradation often follows. (Cited in Derman, "The Unsettling of the Zambezi Valley," September 1990:3)

Findings

National Level (CCG Programme Partners, GOZ, and Others). CAMPFIRE has been a powerful force in stimulating rural peoples and their elected representatives in the RDCs, along with their CCG partners, to take the development of their own areas into their own hands and to apply the CAMPFIRE concepts. They have supplied enduring ideas and detailed case studies. Their work merits continued experimentation, testing, refinement, and elaboration. The CAMPFIRE literature provides some of the few valid analyses that indicate how sustainable development might yet take place.

The CA, the RDCs' most vocal NRM advocacy group, clearly promotes the concept that the RDCs are to be elected "from the bottom up," and the RDCs are becoming increasingly autonomous in the management of their own affairs. The RDCs know, however, that they have limited capacity for NRM and rural community development activities, and that, to achieve their goals for their Districts, they need various kinds of technical and material support. They have been proponents, often in the face of objections by the GOZ (which strongly favors using all bilateral funding for government agency support), of the need for partnerships with NGOs and private sector groups. An important achievement of NRMP II has been to support the CA in its important front-line assistance to Zimbabwean institutions active in bringing private sector and NGO expertise to bear on the expressed needs of the Rural Districts and their local populations. CAMPFIRE advocates in Zimbabwe continue to push for policy changes that will help rural households, village communities, and wards organize themselves so that they can better manage their natural resources.

The Rural District Councils Act was a major step by the GOZ in decentralizing central authority to the 57 Rural Districts of the country. It was a move to delegate power to local people. No longer could a Minister in Harare make unilateral decisions affecting a particular Rural District without its consultation and support.

Official policy statements and sentiments concerning devolution have shifted over time. Bond's policy log (Bond 1998a, reproduced in Appendix N) suggests what some might consider a negative trend of (recentralization) in the 1995-1997 period. However, recent ministerial statements and expressions of interest in CAMPFIRE by the FC and The DNR suggest that this negative sentiment is shifting toward a more positive view of sustainable use through devolution. The MLGNH has likewise endorsed decentralization: "...decentralization is necessary and desirable based on the clear understanding that it promotes and strengthens democracy and civic responsibility and citizens participate in their governance and democracy." (J.L. Nkomo, Minister, MLGNH, 1998) The Minister of the MMET has gone so far as to say that a current legislative review

> ...will include considering further devolution of Appropriate Authority below the RD level, to the villages and wards...We envision a situation where communities eventually have the legislative backup when they decide to go into business transactions and to negotiate deals on their own without needing an overlord in the form of an RD which should ideally concentrate on being a regulatory body. (February 26, 1998 speech, Harare, Zimbabwe)

The GOZ continues strongly to support exploring further means of devolving management of natural resources to rural communities. For example, in a February 26, 1998 speech, the Minister of MMET, CDE Simon Khaya Moyo, declared that CAMPFIRE was an "unqualified success" and that "the Government is proud to be associated with it." He stated further that the Government will continue "easing legislation governing access by rural communities to all natural resources" so that they "can realize maximum benefits from the resources they live with." CAMPFIRE, he said, "is an integral part of...a nationwide decentralization program through which communities will assume greater control over their own development." The Government of Zimbabwe "will be more proactive and will investigate ways of shedding some of its costly responsibilities to capable, well organized communities like those involved in CAMPFIRE." Within this show of support, the MMET and MLGNH, the key ministries with operational responsibility for translating this commitment into action, are, however, proposing different approaches and timetables.

Promotion of bottom-up planning is facing some serious constraints are making its implementation much harder. These constraints, which are not being addressed under NRMP II, are:

- The varying effectiveness of participatory methodologies, even when used by experienced practitioners.
- The need for further experimentation with the methodologies before they can be disseminated widely.
- The differences across Rural Districts in terms of resources, potential, and needs, which necessitate developing and using different strategies.

Rural District Councils. A variety of legislation reinforces the RDCs' central role within the framework of a decentralized allocation of natural resources and the benefits deriving from their use. To date, formal devolution of authority under CAMPFIRE applies only to wildlife. The issue of providing equivalent status to other natural and indigenous resources remains unclear and unresolved, although in general both policy and practice support their use. The CA Board noted that the RDCs can, without the FC's authorization, enter into concession-type agreements with private operators to exploit timber resources within their borders. Current practice, however, is to get FC sanction of RDC-operator concessions. The evaluation team noted at least one case in which the Hurungwe RDC needed FC authorization for its recent timber concession agreement.

The GOZ has passed some acts recently that strengthen decentralization and are a first step toward the level of devolution implied in the earlier discussion of CAMPFIRE principles (Section II D). There is inconsistency, however, across the acts (e.g., the Forestry and the Rural District Acts). The Communal Land Act, for example, enables by-laws but confuses land allocation. Traditional chiefs and kraal heads did not welcome the Rural District and the Chiefs and Headman's Acts because they thought the legislation would disempower them by removing their basis for power and local authority. The Regional Town and Country Planning Act requires local authorities to consult with area residents on all land-use plans in rural areas, whereas the Forestry Act apparently does not permit local

communities to take charge of and economically manage their local forest/woodland resources. The Natural Resources Act can take land away for the State if it judges it to be "degraded" and in need of "rehabilitation." Decisions to take land away are not necessarily made in a participatory manner. The Rural Land Act addresses the loss of habitat to resettlement schemes, the State over RDCs and below (e.g., Masoka) and can also expropriate lands, especially unsettled habitat.

The RDCs appreciate CAMPFIRE because it has provided a mechanism for them to gain new sources of (wildlife) revenue delegated from the State. They also appreciate donor funds such as those provided through NRMP II that allow the purchase of vehicles and computers and provide some temporary salary support to help set up CAMPFIRE offices in the Rural Districts, particularly those without significant wildlife dividends.

CAMPFIRE principles serve as "guidelines" that are applied based on the different needs of the different Rural Districts. Their meaning and significance appear to vary depending on whether the organization is a CCG NGO partner or the CA and RDCs. NGOs have quite different objectives than those of the CA and its member RDCs, which are directly responsible for the well-being of the communities they represent. In response to questions from the evaluation team about CAMPFIRE principles, RDC representatives asked, "whose principles are we talking about?" As noted, each Rural District has its own particular set of resources and needs, so that there may be several different sets of them and no standard, generalizable one. Nyaminyami, for example, may not be giving the recommended percentage of wildlife dividends back to its local communities, as some other Rural Districts may be doing, but its circumstances are different. Wildlife-generated revenue is far and away the most important source of funds for the District's multitude social and administrative needs, such as schools or health facilities. Its local communities -- wards or producer communities, among them -- want these services, and the GOZ does not have money to give them. The RDC believes that it is using the funds to benefit local communities, even though they are not receiving the dividends directly. Other Rural Districts, in contrast, may also be able to generate revenue from commercial farms, businesses, mining activities, etc.

Many CAMPFIRE Districts will have access to an additional source of revenue for local infrastructure development through the World Bank's new "Community Poverty Alleviation Project." It should provide the Rural Districts an opportunity to follow CAMPFIRE recommendations concerning the distribution of dividends to communities at the ward and lower levels more closely. The project will make available US$43 million in *grants* over five years for local infrastructure activities in 26 districts, Nyaminyami included, beginning May or June 1998.

The current focus on RDCs may limit the achievement of some CAMPFIRE community development objectives, such as diversification into community-based management of other native indigenous resources. The RDCs may be more interested in promoting "high value" resource development options and pay less attention to supporting the efforts of smaller groupings of communities in the District who are coming together around resources with much less exciting economic potential from the RDCs' perspective. This RDC preoccupation is understandable, given their pressing need for funds to support general community needs.

The RDCs that have received Appropriate Authority to manage wildlife resources within their Districts are to follow a management plan that designates quota limits on various wildlife for cropping and game hunting. These Districts have been working directly with private sector commercial hunting interests to market their hunts, and with tourist game-viewing groups or hotel chains such as Sun Hotels, that want concession rights within their territories. The USAID project helps the RDCs "get the best deal" from these commercial operators by providing training and capacity-building to local communities. It has no direct relationship with the strictly commercial operations themselves.

To manage their wildlife, well-endowed Rural Districts must crop certain animal populations. Nyaminyami, for instance, uses District game guards to crop about 1,500 impala each year. District trucks pick them up and deliver them to the various wards, where the carcasses are sold at a subsidized price (Z$5/kg). The sales are necessary, says the RDC, to pay for the cost of ammunition, fuel for the trucks, time of the game guards, etc. It is difficult to consider these cropped animals as "belonging" to the producer communities, however, when they have to purchase them. Traditional hunting with registration might be cheaper. Some communities might even be able to increase the value-added by permitting professional bow-hunting under their local control.

Colonial policy relegated the mass of rural poor to state-controlled and owned "communal lands," which are located in semi-arid and generally low productivity regions where open access is the norm. Current programs continue to be designed and implemented around community-shared access systems. Although government policy is to resettle people from the communal lands on to more productive ones, land reform has been slow, and the resources to carry it out are limited. In practice, the resettlement programs and informal settlements are pushing onto marginal communal lands.

The RDCs have not *as a group* demonstrated a bottom-up approach to identifying, planning, and implementing CAMPFIRE activities or CDF grants under the NRMP II, albeit with some clear examples to the contrary (see Appendix E-Gwanda field trip). The RDC approach is better described as top-down, with consideration of local points of view. The reasons for this approach are many:

- No one has given the Harare-based staff and consultants developing CDF projects (the IC and CA) instructions, incentives, time, or methodologies for bottom-up planning in CDF project development. Skill levels for bottom-up planning vary tremendously across the RDC and field-based CAMPFIRE staff.

- The incentive to do bottom-up planning varies constantly as the willingness of cash-strapped RDCs to share revenue with the wards fluctuates from Council to Council and year to year depending on local economic conditions.

- The financial benefits that the natural resource base is producing do not always create an incentive for the RDC to apply bottom-up planning, even though the intent of that planning is to improve the productivity of the resource. The implication is that specific natural resources may only hold financial incentives for local producer communities, which need tailored support to launch them.

- Bottom-up *participatory* planning is hard to do, takes a long time, and does not always work. The Rural District Council Act, as revised in 1996, supports this process. The Land Tenure Commission has submitted new recommendations to the GOZ that show the GOZ is seriously considering returning to the concept of the traditional village, with its own circumscribed territory, led by a chief, who would be advised by a popularly elected council of village people. Under this scenario, the VIDCO and WADCO committees would cease to exist, and the territorial or spatial building blocks for the planning effort would change dramatically.

- In some cases, it is not clear that the RDCs have a significant interest in applying the CAMPFIRE principles because they are already able to exploit the resources without revenue-sharing rules. In other cases, when the CAMPFIRE revenue becomes very large, the RDCs are tempted to use the funds for other District-level social development projects. Nyaminyami is a case in point: in 1996, revenue-sharing accounted for only 27% of wildlife revenue, and in 1997 only 18%. The average across the Rural Districts in 1996 was 52%, with a range of from 0% to 78%. Nevertheless, it may be argued that most RDCs *do* represent their constituents and do seek the best for the greatest number of people -- a political reality.

The existence of CAMPFIRE coordinators, game scouts, and game guards at the Rural District and ward levels paid for by local, decentralized government units out of their own wildlife receipts is an important achievement in the devolution of authority. It brings accountability for the conservation and management of the resources to the local levels most interested in their sustainability for their own long-term socioeconomic benefit.

Below the RDC Level (Ward and Producer Communities). Formal devolution of authority below the level of the RDCs in communal areas has not yet occurred. The fact that most RDCs are treating only "wildlife sport hunting income" as "CAMPFIRE income," with other wildlife (ecotourism and photo-safaris) and natural resource income (from forestry, minerals) accruing only to the Districts, underscores the need for clearer and more forceful policies favoring the downward transfer of resource rights.

There are examples, however, of de facto devolution. Interviews with CAMPFIRE stakeholders at the ward and village levels revealed that, in some Rural Districts, democratically elected ward- and village-level committees *do* control CAMPFIRE wildlife revenues and decide how to use the money for the good of the community. Some local interviewees firmly rejected the notion that they would do whatever the RDCs told them to do with their CAMPFIRE dividends. Some Districts, for instance, have permitted the formation of "dam committees" around small dams and bodies of water so as to manage their fish resources. However, the options available to local communities have not been well-developed. NRMP II could support applied research and technical capacity-building on this important topic.

When the evaluation team interviewed people in the wards and villages, the latter expressed a clear sense of "their land and resources." They asserted clearly that they would be able to manage these resources themselves if given the right. This potent concept may receive impetus under the proposed

new natural resources legislation. This legislation will reportedly affirm the concept of village territories which would be defined and turned over to local management and first-level resource conflict adjudication.

On the other hand, it is clear the RDCs and CAMPFIRE Ward committees believe that the local communities need, in the words of one CAMPFIRE Board member, to be "controlled so they won't just do whatever they want with their resources." At one extreme, a paternalistic concern was expressed to the team that distribution of cash dividends to local people will lead them to waste it.

Greater attention could be paid to the other channels already permitted by law that the CA is not yet pursuing effectively. Other NGOs and USAID have advocated cooperative structures, user groups, economic interest groups, and other groupings *not* tied to RDC authority. As yet, they have not, as yet, been able effectively to translate these options into practice. There is concern that the MLGNH might see the effort as "subversive" to the local government structures that should be providing such services. There is also a perception that the other channels might create a dependence on "outside" NGOs rather than on local leaders and RDC members.

As Appropriate Authority is currently structured, the unit of proprietorship is not small enough and continues to be a major challenge in Zimbabwe's evolving CAMPFIRE Programme. Current government discussions offer hope for further devolution of authority to the ward and even to lower levels. However, different natural resources may require different approaches to devolution.

Legal authority over natural resources below the district level is vested in a number of ministries and commissions and is addressed in several laws, ministerial regulations, and policy documents (examples being the FC and the Forest Act). The DNPWLM was the first governmental body to experiment with devolution of authority, in this case with respect to wildlife resources. Since then, many of Zimbabwe's public entities have expressed an interest in following that innovative lead.

In practice, the following concepts have been the focus of attention:

- Supporting producer communities using a constellation of natural resources.
- Vesting producer communities with a wide bundle of access, use, and management rights over the resources.
- Sharing the natural resource revenue between the RDC and producer community in question.

The hypothesis that drives these ideas is that vesting the producing communities with rights will provide a much-needed incentive for them to engage in sustainable management. The policy framework supporting such incentives is, however, unfinished. In part the reason is the CA's inability to push the policy agenda in this critical area forcibly. Recently the PET subcommittee for policy has shown renewed energy in pursuing this agenda.

The CCG organizations and their staff have successfully kept devolution on the local agenda and in use as a significant concept by continuing their experimentation and workshops in the wards and villages of producer communities. The most common action has been to conduct "awareness workshops" to inform producer communities about what rights they have over their natural resources and how they might benefit from their sustainable use. Certain follow-up workshops are designed to empower these communities to act on this knowledge, especially when the resource has a high market value, the case with wildlife.

It appears that tension is growing between the RDCs and villages as people gain experience in applying CBNRM ideas and demand greater accountability of their local officials. At the extreme, the team was informed of an instance where the records on wildlife or other natural resource off-take which are not kept at ward levels, and where the RDCs directly hired and supervised ward-level game scouts, pressures for unrecorded hunts are taking place at the RDC level and that "two sets of books" are or were being maintained on what specific wards should expect to receive. This extreme example underscores the growing pressure and need for further decentralization where it the scale of operations is localized. At the same time, NGOs have been working at the ward levels through the NRMP II to build their capacity to keep accurate records and account for funds (see Appendix K on one Hurungwe Ward).

Devolution of Benefits. As previously discussed, there is scattered anecdotal evidence that the villages and wards are being "steered" on how to use their CAMPFIRE revenues for collective income-generating projects and social services. This "steering" is *not* necessarily bad *if* the schools and clinics built are provided with the necessary paid government personnel. In a similar vein, it appears there is a tendency for observers, supporters, and facilitators to pass judgement on the value or usefulness of what the village and ward committees decide to do with their money once they get it. For their part, the RDCs want to be kept informed on a timely basis of what the wards and villages intend to do with the revenues, since, as the legal authority in the district (and below), they are accountable for all local governance activity, including the utilization of local revenues from whatever sources. For the same reason, they have a responsibility and right to know about the outside organizations working within their borders.

Giving local communities the option of receiving cash dividends, however small, is a strategic masterpiece, as people are then willing to combine their funds for larger activities of social benefit to a wider section of the ward population. This outcome is very satisfactory to the RDCs, as it assists them in providing the social services the central government is not providing. This practice also offers a strong impetus to producers to participate in the Programme and convinces villagers that the RDC is not "holding out on them."

The RDCs and villages often use the revenues and grants they receive to promote long-term resource stability. However, the wards and villages are not necessarily using their CAMPFIRE dividends for specific wildlife management projects. Instead, some have spent their revenues for schools, teachers' cottages, grinding mills, clinics, and household dividends. Three wards are using their funds to maintain game fencing, and one ward is considering using the funds for dam maintenance. Other

NRM-related uses for the funds include water points for wildlife, dam maintenance, and reclamation of an irrigation scheme. It is difficult to argue with these expenditures, as long as a majority believe they are the best ways to improve the welfare of households individually and collectively. In time, as the more urgent social needs of local communities are met, and if they believe their tenure over the resource is secure, more wards and villages will invest at least in the maintenance of resource management facilities.

In most Rural Districts, the producer communities need a very high percentage of the revenues for them to have an incentive to conserve and manage the wildlife resource. There is fragmented evidence that the RDCs are returning less to producer communities with each passing year. As discussed in Section III.A.3, the RDCs have a mixed track record on devolving CAMPFIRE revenues. The producer communities receive 50% of the revenues allocated to them under CAMPFIRE. However, the amounts are sometimes too small and too variable to elicit the needed sustainable management response from producer communities.

Indeed, some local communities are favoring cropland over wildlife and are engaging in uncontrolled subsistence hunting of lesser game species. There are a number of reasons for this response:

- The RDCs have many demands for revenues, and natural resource-based income is a tempting source of general funds.
- The RDCs are also very slow to return the benefits to local communities.
- Many of the current, leading CAMPFIRE wildlife Districts are not consistent in reporting their wildlife-related income, partly because some apply a narrow definition of that income. Many Rural Districts bordering on the National Parks (e.g., Nyaminyami) receive, or until recently received, 50% of the trophy fees from the National Parks for hunting that takes place in the "Safari Areas," which, while not actually part of district territory, nevertheless have wards adjacent to the parks. Because the Rural Districts do not consider this revenue as deriving from CAMPFIRE, they do not report it and instead use it for general revenue needs. If this revenue were considered as CAMPFIRE, it would be included in what is potentially shared as dividends with local communities.
- NRMP II funding is not made contingent on RDC accountability for the use of CAMPFIRE revenue.
- A final point is that most GOZ Acts devolve considerable authority to the RDCs and little to the wards.

There has been some limited experimentation with "producer community" management (or "community-based cooperative management") of wildlife and other renewable natural resources. Examples are the Mopane worm management in Bulilima-mangwe, grazing schemes, proposed communal wildlife trusts, and collective management of some fisheries.

Conclusions

Some local producer communities feel no security of tenure over wildlife-related benefits in terms of amounts, timeliness of receipt, stability over the years, and integrity of the RDCs that are responsible for issuing the dividends. As a consequence, the incentive to manage their wildlife resources sustainably may be insufficient. This situation is a major threat to CAMPFIRE in general. It may also require that the RDCs become the "district game department" to protect the source of the revenues.

Within Zimbabwe, the model for decentralization is "co-management" (State and rural partners), and not full decentralization and devolution of authority to rural communities to manage the resources themselves. This model limits CAMPFIRE's applicability to other countries in Africa and elsewhere, where devolution of authority for some natural resource subsectors has progressed further (see text box 8).

To date, progress toward "producer community" management (or "community-based cooperative management") over wildlife and other renewable natural resources remains limited to a few experiments. Murphree states that "the core of the matter is strong property rights for *collective communal units*, not only over wildlife and other natural resources, but over the land itself." The RDCs continue to retain tenurial rights over the entire unit of their communal lands. While they are sharing a portion of the revenue benefits with the wards with wildlife resources, the amounts, timeliness, and consistency of the payments vary, affording little security to local communities. This is CAMPFIRE's greatest recognized weakness and greatest threat to its conceptual roots.

Different resources require different levels of devolution of authority. Whereas it may be appropriate for wildlife, which move around, to be managed at a district level, the same is not necessarily true for other natural resources (e.g., timber, fish in ponds, and forest products).

A return to the concept of "natural resource cooperatives" might be considered, under the authority of the RDCs or with local autonomy.

Greater effort to look at alternative approaches to providing support at the ward and village levels is needed. Despite the existence of counterexamples, too much credence has been given to the idea that Appropriate Authority prevents any other kind of village/ward-level community action program.

There probably is enough latitude at the Rural District levels to permit small-scale support for household- and village-level initiatives (associations, pre-cooperatives and cooperatives, and economic interest groups) aimed at exploiting natural resources other than wildlife, if the resources are available in economically interesting quantities. Organizing across ward and district boundaries, as is already being tried in certain larger private sector-oriented initiatives, may be necessary to achieve the volume and scale needed for economic viability. The economic aspects of such initiatives will need to respect the need for tenure security, and the beneficiary communities should be the producer communities.

Two of NRMP II's critical assumptions are problematic: (1) that "adequate ownership and use rights continue to exist for individuals and communities to manage resources sustainably and to benefit directly from that management"; and (2) "CAMPFIRE communities can manage population growth, particularly due to in-migration from less developed areas." It is not clear that either of these conditions has ever existed in a *general* sense, and movement toward these conditions is too slow and is hampered by contradictory policy. This situation can threaten program achievements and long-term sustainability.

Box 8.

In Niger, the State, through the Forestry Service, has delegated (subject to management plans) what is legally mandated appropriate authority to *specific villages* to manage a geographically delineated territory. The policy is one village-one territory-one market. The village has exclusive rights to market all firewood within the boundaries, subject to a mutually agreed upon management plan. The village itself sets the price of the wood, and all merchants must purchase wood from these village markets. The village market manager gives the wood merchant a government-authorized permit to transport wood (location, quantity, and cost indicated). The village market manager also collects, above the cost of the wood, a government levy of US$0.20/*stere* (one cubic meter of wood). This policy has effectively stopped the "rape of the woodlands" by wood merchants and forestry officials, brings very significant revenue directly into poor communities, and generates far more income for the State coffers than the previous system of "open woodland commons," which permitted abuse and corruption. The communities are now lobbying for officially recognized sanction powers to administer and keep fines levied. Zimbabwe could learn from this model that for some resources, their payoff to placing confidence in village level structures and authorities.

Stressing the autonomy of wards to make decisions about CAMPFIRE revenues is a key success factor in the Programme. The RDCs should continue to make clear on an ongoing basis that the wards and local communities can receive the dividend payments during any particular year and should be flexible in allowing for community-led choices. The CAMPFIRE principles will be quickly violated if the dividend dispersal system does not allow local communities to choose their own projects freely each year.

CAMPFIRE supporters should limit their interventions to facilitating access to the benefits of the resource and insuring that spending and allocation decisions fairly involve all groups considered as producers of the resource.

The acclaimed and widely visible success (in terms of income generation) of the legislation authorizing Appropriate Authority for wildlife resources has perhaps blinded many to the potential that exists in other areas. The RDCs, the CA, and too many others have jumped on the wildlife sport-hunting bandwagon, a fairly easy winner, and paid insufficient attention to other sectors. In this regard, it is important to identify and support local Zimbabwean private and informal sector initiatives underway in many different areas (the following section explores questions related to diversification of income and indigenous resources).

Recommendations

The RDCs that crop animals might consider giving a share of the "quota" for cropping to the wards adjacent to these wildlife areas, allowing them to remove the permitted number of animals when and how they wish. This practice would devolve an important resource into their hands so that they will begin to think of these animals as theirs, much as they do their own cattle. The communities would finance the removal of these animals themselves. The RDC could monitor the Programme through the game scouts, who would be involved in the process.

CAMPFIRE support personnel in the CCG and districts (CAMPFIRE coordinators) need to spend more time linking up with other Zimbabwean private and informal sector natural resource utilization schemes. CDF funds could be used to help support promising and sustainable ventures that would provide economic returns to village- and ward-level communities or groups.

CAMPFIRE must get away from the idea that the RDCs must control all income-generating NRM economic ventures, from which they retain about one half of the benefits for themselves. In the case of many small-scale economic ventures, *all* income should accrue to the village- or ward-level associations or cooperatives, with only a small levy being passed on to the RDCs. Examples of this approach are found in many other parts of Africa.

CAMPFIRE should expand technical and organizational support to local user groups such as the "dam committees" organized to exploit fisheries. The devolution models practiced in other African countries might be consulted (see the text box below).

CCG members must harmonize their efforts, particularly in light of the important challenges facing Zimbabwe's CAMPFIRE in the coming years in terms of maintaining current wildlife resources and extending CAMPFIRE activities to other natural resources.

Box 9.

The Fisheries Department in Niger has permitted villages surrounding small, permanent bodies of water to stake exclusive claim to the management and control of the fish in their waters. Several villages that traditionally have exploited the fish organize into a "fishing cooperative," which has a set of internal rules to manage the fishing on this body of water. To fish, each fisherman must agree to follow these rules and must, besides paying the State fishing tax, pay a local tax to the cooperative. Both taxes are controlled by "fishing monitors" who are paid for out of the cooperative's revenue. All fish taken from the waters must be weighed, differentiated by species, and counted at the cooperative's fish market, where fish merchants come to purchase fish. The cooperative levies a tax per kilogram of fish, with different rates for different kinds of fish. The cooperative itself has stopped the custom of fishing year-round in favor of two fishing seasons of about 60 days duration. The cooperative may close the fishing season early if total fish weights (aggregate and for a few key species such as Nile perch) drop below predetermined limits. Income generation has been very substantial for the local communities that monitor the fishing themselves (size of fish, net mesh, etc.) and issue fines for the cooperative treasury. The State gains revenue from the increasing number of fish permits and the transportation levies paid by the fish merchants. This system started being used in Niger before all the legislation was completed , and actually helped define it. Similar activities could take place within Zimbabwe through a delegation of authority (not Appropriate Authority) to the dam committees, which should be organized into similar structures with the authority they need to manage these resources properly.

The PRA skill levels of CCG members and district-level technical staff need to be increased and could represent a valuable shift in the NRMP II, with one caveat. PRA is easily oversold. In practice, the success of PRA depends on the communication skills, analytical judgement, quick thinking, and creativity of its facilitators and trainers. Experience has shown that this condition is a limiting factor on wider use of PRA.

The NRMP II should continue to support the capacity-building activities already underway at the ward level, and expand them into wards with income-generating resources and currently not receiving assistance. This support will permit them to do better accounting, financial reporting and monitoring, and annual program budget planning.

To promote a more bottom-up approach to planning by the RDCs and other players, the CCG and CA will need to become more active in policy analysis and dialogue concerning devolution. Success with enabling legislation to support further devolution would go far to providing the incentive needed for bottom-up planning.

All CCG members would profit from greater and more in-depth experimentation with methodologies for participatory land-use planning, resource inventories, conservation projects, and identification of village- and ward-based CBNRM activities. Most would also benefit from stronger skills for analyzing the market subsectors for natural resources.

Incentives need to be given to the RDCs and other players to promote CAMPFIRE principles and bottom-up planning. These incentives include:

- Rewards, perhaps in the form of selective grant support, for those who apply generous revenue-sharing rules and experiment with bottom-up planning;

- Positive publicity for those RDCs that do revenue-sharing and bottom-up planning;

- Application of negative sanctions for those that fail to do bottom-up planning and are stingy in their revenue-sharing; and

- A clear, up-front statement by the CDF that the degree of resource-sharing and bottom-up planning will be important criteria in judging proposals and requests for financial support.

The CA and all relevant CCG members must pay much greater attention to policy issues. Zimbabwe is entering a period of change, and activity in this area could produce significant, long-term results. The CA should take on policy debate as its major role on behalf of its rural constituents. The CA should encourage CASS to provide analytical support in this area.

Evaluation Issue: Performance of the Ministry of Local Government and National Housing in CAMPFIRE

Although it has not yet had an active day-to-day implementation role, the MLGNH is a key partner within CAMPFIRE because of its oversight responsibility for decentralization and local governance, including the RDCs. Moreover, it is one of NRMP II's GOZ partners in the bilateral agreement and a member of the Bilateral Review Committee. Under NRMP II, the Ministry sets policy, approves CDF grants, and is concerned with RDC, WADCO, and VIDCO accountability for the use of project funds, and with how local peoples are organized and how development initiatives impact them.

Findings

One of the MLGNH's responsibilities is the GOZ portfolio for governance at the local levels. Its official, legal charge is to *establish and maintain the institutions for local governance in Zimbabwe*. Its authority centers on fostering and assuring effective relationships among the various levels of governance, consistent with GOZ law -- provincial, Rural District, ward (WADCO), and village/community (VIDCO). As the exclusive legal authority for local government in Zimbabwe, the MLGNH conducts the initial reviews of applications from the RDCs for Appropriate Authority. It then forwards the applications it approves to the MMET, the ministry with authority over all wildlife issues. It in turn reviews, approves, and returns the applications to the MLGNH, which then notifies the RDC of the decision. Thus far, approval has been 99+% certain.

MLGNH's role within CAMPFIRE is to establish and regulate the institutions of local governance. The Ministry insists that CAMPFIRE structures be integrated with official government structures. In the past they have expressed concern about the creation of "parallel structures" that they believed CAMPFIRE, especially through ZimTrust's field activities, was establishing.

Concerning NRMP II, the MLGNH goes to great lengths to distinguish two phases, one that occurred prior to a 1996 agreement, PIL 67, which addressed most of the concerns of the MLGNH and MMET, established new principles for project implementation, and affirmed a new basis for cooperation with USAID, a second, "much happier period" that followed the signing of PIL 67. The MLGNH attributed the implementation problems CAMPFIRE experienced in 1996 principally to the failure of the other implementing agencies to recognize the authority and responsibilities of the key government ministries responsible for the institutions of local governance (the MLGNH) and wildlife (the MMET). The parties held several meetings that resulted in PIL 67. The meetings also helped build trust and strengthened relations between the Government, USAID, and the CCG. Whereas in the past the MLGNH had found USAID "the most difficult donor to work with," more recently collaboration has been positive. The Ministry now claims that USAID, successfully working through it as part of a larger group, has even "helped the government speed up the process of decentralization." While "there is still room for improvement," any significant perceived weaknesses in CAMPFIRE are seen as having preceded the 1996 consultative meetings.

The MLGNH is a member of the key new implementation structure, the NRMP II BRC, which also includes USAID, the MOF, and the MMET. The BRC has primary responsibility for management oversight of project implementation, including resource allocation, evaluation, and national-level coordination of project activities with other relevant development initiatives. As the lead GOZ agency, the MMET serves as the BRC Secretariat.

The MLGNH is also a member of the CCG, although it usually does not play an active role in the everyday implementation of NRMP II. According to the MLGNH, the 1996 problems had called its project participation into question. The Ministry remained involved because of the importance of the needs of the people on communal lands and the "possibility" that the project could be repositioned on a proper course. The MLGNH has been attending the CCG meetings regularly since the 1996 agreement, although it was not represented at any of the meetings the evaluation team participated in. While its role is limited to oversight, approval of project activities, including CDF grants, and, to some extent, policy formulation, senior Ministry officials assured the evaluation team that they "will do everything they can to make sure the CAMPFIRE project is a success."

As the MLGNH no longer feels bypassed, it and USAID have finalized discussions on the Ministry's workplan and budget. The MLGNH will soon access funds under NRMP II. One area of proposed MLGNH activity under NRMP II is monitoring and evaluation of individual RDC performance under CAMPFIRE. It will also help strengthen RDC financial management capacity through a program of annual audits.

The Ministry has a vision of success that is somewhat different from that of most organizations involved in CAMPFIRE, and it is critical of the current direction and implementation of the CAMPFIRE Programme. The original (and in the MLGNH's opinion, proper) intent of the Programme was to allocate resources and revenues directly to the RDCs, to be used, it claims, at that level and below to provide needed services and facilities for their populations. The MLGNH is concerned that donor assistance largely goes to support the CA, CCG, and NGOs. It believes the

assistance should instead be going directly to the RDCs, which identify needed services and contract for them.

The Ministry concurs with the RDCs that CAMPFIRE natural resource revenues should be deposited with the RDCs and that they, with input /approval from the producer communities in the RDCs, should determine how to use them. One rationale it gives is that the proceeds from wildlife now depend on where the animal was killed, which is not necessarily in the community that made the management sacrifices in terms of cohabitation with the game while it was living. For example, Ministry decisionmakers note, "an elephant which wrecks havoc in Ward 3 and travels through other wards and finally gets killed in Ward 9, 50 km away, benefits only Ward 9, and not the other wards that suffered along the way. It is our hope that the Campfire Association will make wide consultations on the issue." The MLGNH claims that natural resource revenues do not now get deposited with the RDCs and that they get only a small percentage for administrative purposes. The issue of whether the utilization of proceeds from CAMPFIRE activities should be handled by the producer communities or the RDCs still needs debating.

The MLGNH also stated that the allocation of CAMPFIRE resources is overweighted toward CCG support to NGOs (80%), whose "capacity to carry out all the tasks required is doubtful," according to the Ministry. It thinks that all CCG members are aware that they are to work through the local governance institutions established under GOZ policy and law, and that they are not to use CAMPFIRE funds to set up parallel institutions of governance. It argues that CCG members should support ongoing capacity-building programs that reinforce existing institutions. It supports an approach of learning by doing because it builds sustainable systems in the RDCs. The Ministry's stance on devolution is conservative but it is nevertheless, "cautiously delegating power to lower tiers of government and assessing their financial and managerial capacity to handle the added responsibilities."

The Rural District Councils Act (1988, Previson 29:13) permits sub-district local authorities to take action in most areas where government is active and to administer programs, including NRM. With initial approval from its RDC, the local committee can form joint committees and undertake projects to benefit their specific areas. For example, a group of villages could agree to develop some common land for their own benefit (e.g., a tourist park). Under the Communal Land Act (1982, Provision 20:04), any land intended for commercial use must first be "alienated" from the communal lands, and then the Ministry must give its approval. Further, the intended land use has to pass an environmental assessment and other standard qualifications. Given this framework, the MLGNH maintains that sub-district organization and enterprise development are possible within extant GOZ local governance institutions and regulations, and that "parallel institutions" are unnecessary and "counter-productive."

Conclusions

With the exception of CDF grant proposals, the MLGNH has been minimally involved in CAMPFIRE. It should be more involved, since it is the legal authority for local governance in Zimbabwe and will have to approve the devolution of Appropriate Authority below the RDC level.

MLGNH officials appear to have a mixed understanding of CAMPFIRE's approach of working through the CCG structures to build local NRM institutions. It needs to develop a better understanding of the possibilities that partnership with NGOs offers.

Recommendations

Since the MLGNH is a key agency in the bilateral arrangement and is a member of the BRC, USAID should expedite the release of funds to the MLGNH and strengthen dialogue in the context of policy concerns and NRMP II phaseout. The MLGNH should increase its active involvement in CAMPFIRE.

The CCG should be proactive in approaching the MLGNH as a policy dialogue partner.

The policy issues that fall within the MLGNH's authority should be identified and a dialogue initiated on them. In particular, the means for resource management below the RDC level needs exploration.

The CCG should explore the areas in which the MLGNH could actively contribute to CAMPFIRE, including a possible expansion of responsibility in the allocation of CDF funds. USAID should engage the MLGNH in a dialogue on key issues relating to CAMPFIRE sustainability.

CDF management (USAID, IC, and the MLGNH) should develop a plan for utilizing proposed MLGNH audit results in coordinating field activities and in defining the financial management criterion for "graduating" CAMPFIRE communities. The MLGNH should coordinate with the IC to benefit from financial involvement with the RDCs. Helping to move RDCs from cost reimbursement to an advance system under the CDF would be a good first step.

B. Land-Use Strategy and Diversification of Benefit Streams

Diversification of the sources of economic benefits through improved NRM depends on the potential inherent in the resources and on the political-ecological context (which includes pressures to maintain other land uses such as grazing or resettlement, an administrative propensity to concentrate settlement, resource access regimes i.e. a foreign mining company representative scoffed at the suggestion that his company might pay revenues or royalties to local communities to offset environmental costs.). Resource assessments generally underlie development projects with a NRM objective. CAMPFIRE is somewhat exceptional because early on it captured a ready stream of revenue, and a single resource indicator -- trophy quality -- determined the Programme's organization and focus in the early years. When, in 1994, the Programme began branching out into other resources, institutional momentum and the undeniable importance of wildlife continued to hold other resources somewhat in the background. However, the CA has outlined diversification as a major strategic thrust, and more attention is now being paid to other indigenous resources.

This section assesses the progress and apparent potential for broadening the economic base upon which the CAMPFIRE principles are being tested. In this respect, several issues may prove key to the future character and composition of the CAMPFIRE movement:

- Actual land-use potential, the institutional capacity to make that determination, and the means of devising an appropriate land-use strategy based on the assessment.

- Diversification of the benefit streams: the economic potential for sustainable exploitation of resources and the prospects for channeling revenues in a manner consistent with the movement's philosophy.

- The depth and breadth of CAMPFIRE management's capacity to accommodate new resources, markets, and modalities of production and distribution.

- The feasibility of using NRMP II funds to bring in new institutional partners to meet the expanded mandate.

These issues are vital and underlie the rationale for recommending continued funding for NRMP II under the scenarios presented in Section V of this document. The evaluation has already signaled that under CAMPFIRE, WWF has made significant steps toward implementing a pilot participatory land-use planning methodology (see Section III.B.2).

Evaluation Issue: Appropriate Land Use. *"What is the most environmentally, economically and culturally appropriate land use strategy among CAMPFIRE's RDC members?"* (SOW B.1.c) *"To what extent have certain key assumptions in the design of NRMP II remained valid? To what extent have certain external risks affected Project implementation and achievements? What are the real prospects for expanding CAMPFIRE beyond its current focus on the consumptive utilization of wildlife (especially the large mammals) within the NRMP II's existing time frame?" (SOW questions C.2.a and C.2.c)*

Findings

A varied set of forces drive land-use strategies in CAMPFIRE communities, including: the relative income derived from wildlife and agriculture; the influence of traditional authorities, RDCs, and the central government; the balance of ethnic and cultural factors; politics; population; the programs of external donors and NGOs; the demands of safari operators; other private sector interests; and rangeland management paradigms. Households, villages, and larger groupings employ a diverse set of strategies to help manage risk, and these are shaped by their natural resource endowment.

In CAMPFIRE areas, the variability of the resource endowment is critical. Severe drought, for example, is always a risk in the communal areas, where annual rainfall averages less than 650 mm. Rainfall is "very erratic," and below 450 mm it is "unreliable." (Child 1995) Between 1989/1990 and 1996/1997 there were six consecutive years of below average rainfall in Zimbabwe, with 1990/1991

recording the lowest level, 50% below average. Only the last two years of rainfall have been above average. The 1991/1992 drought was relatively more devastating to agricultural income than it was to income from the more drought-adapted wildlife, and during that season wildlife became a larger percentage of household income in CAMPFIRE wards than it had been before or has been since.

Economically viable technologies and intervention strategies can be developed and adopted for the full range of ecosystems included in the Programme. There is ample evidence that economically viable intervention strategies exist for Natural Regions IV and V because they are being used on private game ranches, most of which are profitable. Some of the same strategies could be used on communal lands, although with less certainty because of the communal tenure of land and wildlife.
It seems to be a valid rule that if wildlife income exceeds agricultural income at the household level or is a valued component of a household's strategy for reducing risk, then wildlife will be a preferred land use on a large part of the lands at the disposal of the community.

Wildlife areas are also woodlands with other resources. However, with the exception of a few areas with commercial timber potential, there is less clarity about the viability of strategies aimed at the management of veld and forest resources on communal lands.

Key Project Assumptions

- *Wildlife utilization can compete economically and financially with other extensive forms of land use.* Zimbabwe is divided into five natural regions that fall along a continuum so far as the economics of livestock and wildlife are concerned. Regions I and II are suitable for intensive crop and livestock production. Only more intensive types of wildlife farming could compete in those areas. In Natural Regions III, IV, and V, where most of the communal lands and CAMPFIRE initiatives are found, extensive wildlife ranching produces a greater economic return than does livestock. This research conclusion applies to both commercial farms and communal lands that have abundant wildlife. However, commercial farmers have been using wildlife for commercial profit, whereas communal farmers have a tradition of co-existing with or without a privatized sense of ownership and control over the resource. For CAMPFIRE wildlife revenues, this fact may help explain why communities often choose collective investment in social infrastructure over cash dividends for individual households.

- *Communities deriving wealth from wildlife resources will both wish, and be able, to protect these resources, but only under favorable conditions.* The most favorable conditions include: receipt of benefits from wildlife sufficient to offset the costs of living with the wildlife; a secure claim to a continuous flow of benefits; and enough control over access to the wildlife that it can be protected.

    - From a land use perspective, the income and other benefits to individual households from wildlife has to compare favorably with the damage the wildlife causes, plus any income forgone by not grazing livestock in the wildlife areas. Other factors that may need to be taken into account are the objections of the people being moved out of a wildlife area, the

termination of people's access to thatch or other veld products, and even restrictions placed on dogs.

- Another condition is met if the producer community has agreed to protect its commercially valuable wildlife and can enforce its decision when the wildlife is on communal territory, while someone else enforces controlled access to the wildlife when it is elsewhere (the problem of a fugitive resource).

- *Communities not only will be willing to manage these resources but also can become capable of doing so, and will invest in this management.* It is simply rational entrepreneurial behavior for a person or group to manage the resources that support their livelihood and to want to improve their management capabilities, if there is a good chance that doing so will pay dividends that exceed the costs. The members of CAMPFIRE communities demonstrate this behavior in the management of their individual farming activities. Management of communal resources, such as wildlife, however, requires the community to act as one body. There are examples of communities, such as Kanyurira, that maintain a wildlife fence because wildlife is a large income earner, just as there are examples of communities that let their fences fall into disrepair, perhaps because they have little meaningful function.

- *With control over resources, farmers' behavior will lead to the improved conservation of the resource base.* Control of resources over time is upon occasion called secure resource tenure or property rights. Many of Zimbabwe's commercial farmers have demonstrated that with secure tenure in the form of usufruct of the wildlife on their private properties, they make wise use of that resource base, protecting it, encouraging it to grow, and making profitable, sustainable, commercial use of it. Communal areas offer farmers few secure rights to resources. Wildlife can be the exception where Appropriate Authority and revenue distribution to producer communities operate effectively.

Some observers argue that wildlife is an inappropriate use of the land because it competes with food security (ENDA, cited in Bond, 1993, and see also Cumming, 1994). This view is based on a faulty concept of food security. Food security is not the same thing as food self-sufficiency, which implies that people are producing all their own food. Food security implies that people can purchase or barter for what they do not produce themselves and are making the best use of all their resources in a market economy.

Where communities prefer wildlife use on a portion of the lands at their disposal, their choice may not only be economically rational, but it may also be consistent with their cultural values based on their long history of hunting and coexistence with wildlife.

Field Observations. Some of the conflicts between villagers and resettlement programs are severe. In some cases, traditional authorities have parceled land out for uses that conflict with communal and/or RDC preferences for wildlife management. In other cases, the RDCs prefer wildlife uses for lands in contravention of the preferences of local communities, which perceive the Councils

to be the prime beneficiaries of the income from wildlife. In still other cases, the central government has directed agricultural settlement of lands that could produce higher returns if used for wildlife. In one case external donors directed agricultural uses on wildlife lands. There was also a case of a safari operator who attempted to increase the land available for wildlife by redirecting a fence he was building for the community, but the community defeated his effort.

The evaluation team found that the NGOs have provided useful assistance to local communities in setting aside land for wildlife enterprises.

The risk of regional political unrest is abating with the cessation of the fighting in Mozambique. Team members visited one CAMPFIRE village near the border with Mozambique and found that it is benefitting from the peace in that the guerrillas are no longer killing their wildlife and people.

Conclusions

It has been shown that wildlife is economically superior to livestock as a land use in Natural Regions IV and V, where the communal lands are mostly located. Wildlife can be economically the best resource to use in many parts of Natural Regions IV and V, including on communal lands. In a market economy, making the best economic use of resources contributes to food security. Because wildlife is based on intact ecosystems characterized by natural vegetation, usually it is environmentally the most benign use of these lands.

Assuming secure resource tenure, several factors are vital to successful wildlife utilization under CAMPFIRE:

- Producer communities must receive a major share of the revenues from the wildlife or other resources being commercially exploited under CAMPFIRE.
- When a producer community is effectively protecting the resource from open access, in this case wildlife, which is a fugitive resource, it must receive adequate protection as elsewhere.
- Communities that have incentives to manage their wildlife must receive the technical support and training required to do so in an effective and economically sound manner.

The paradigms for the management of rangelands are moving away from a strict red meat focus with the realization that the regions are not equilibrium systems and the dominant rangeland strategy of single or dual species under fenced conditions is no longer viable.

People can be expected to seek the optimal economic strategy for use of their resources, subject to the constraints imposed by the resource tenure arrangements they are under.

Wildlife-based income can be a form of drought insurance in CAMPFIRE communities because it tends to remain more constant than agricultural production during a drought. This contributes to food security even if wildlife itself makes little direct addition to the diet.

Land-use strategies in the CAMPFIRE areas must be based upon sound technical and economic analysis, local self-determination under secure tenure arrangements, and minimal but supportive government involvement.

Recommendations

Through its policy subcommittee, the CCG should consider the applicability to CAMPFIRE of the recommendations of the recent Commission on Land Tenure and the new legislation that purports to give clear titles to communal lands and first-line authority for resolving conflicts to village communities.

Based on a systematic review of the policy and legislative changes now underway, the CCG should establish an operational plan that would enable CAMPFIRE communities to hold appropriate authority over wildlife and other CAMPFIRE resources. Related actions would include communities forming legal associations or cooperatives and revision of the resource laws. Accelerated development of the more exceptional land use mechanisms (cross-District management agreements, local wildlife zones, etc.) Should be accompanied by careful monitoring. These 'test' cases are the type of field activities that the USAID SO team might want to monitor directly.

USAID should devote NRMP II funds to policy change and implementation related to access to and tenure of land and resources. In particular, more work should be done on the economics of NRM on communal lands, taking into account the variety of resources and ecosystems, the insecurity of tenure at present, and the potential for more secure tenure based on indigenous knowledge and use of resources.

Greater understanding of the importance of wildlife income and potential uses of wildlife products as drought insurance in the CAMPFIRE areas that have adequate wildlife resources needs to be developed and disseminated.

Evaluation Issue: NRMP II and Trophy Hunting. *"To what extent is the NRMP II supporting or promoting trophy hunting, particularly but not exclusively, of elephants, in Zimbabwe (directly or indirectly)?"* (SOW C.4.a)

Findings

NRMP II is neutral with regard to trophy hunting: it accepts the right of CAMPFIRE communities to determine for themselves the most economic uses of their wildlife. CAMPFIRE gives people a meaningful stake in their wildlife; and it does not encourage or discourage this use of wildlife. Trophy hunting is conducted through established channels that require and receive no direct NRMP II support.

With or without NRMP II, CAMPFIRE communities would be developing the legal off-take of wildlife on their communal lands. USAID funds are used to ensure that this off-take is conducted in a sustainable manner (i.e., through such means as quota-setting, resource monitoring, and hiring of game scouts). NRMP II has discouraged and reduced illegal off-take (i.e., poaching) of wildlife on communal lands in the CAMPFIRE areas, in part because it has enabled the employment of resource monitors who track legal and illegal hunting in their wards.

Conclusions

There is no need for USAID to take steps to disassociate the NRMP II from CAMPFIRE because communities in the Programme choose to receive income from their wildlife through sport hunting. With or without NRMP II, CAMPFIRE communities will develop the legal off-take of wildlife on their communal lands. NRMP II at least offers some assurance that this resource is managed in a sustainable manner.

Recommendations

USAID should maintain open communication and information exchange with the USFWS in an effort to support CITES compliance.

The CCG should examine options for giving more focus to revenue generation based on sport hunting of "lesser species" such as impala.

Evaluation Issue: Diversification of Benefit Streams and CAMPFIRE Management Capacity

Alternative Income Sources. *New income is linked to the development of alternative natural resources which may be found within RDCs. "The NRMP II economic analysis projected significant increases in CAMPFIRE revenues from non-consumptive resource utilization schemes, particularly wildlife based eco-tourism. To what extent have these projected increases materialized? What are the real prospects for expanding CAMPFIRE beyond its current focus on the consumptive utilization of wildlife (i.e. especially large mammals) within the NRMP II's existing timeframe? What strategic, financial, or other modifications to the existing Project would be required to achieve this Programme diversification objective? What, if any, additional financial or other support would be required in this interest, and how might it be put to the most effective use?" (SOW C-2-c) "CAMPFIRE currently focuses on a limited set of indigenous natural resources (mainly renewable wildlife resources). Does the Programme have breadth/depth to include the management of other natural resources and/or indigenous cultural resources, such as traditional folklore, arts/crafts, cultural practices, special archeological or cultural sites, etc., under its umbrella?"* (SOW 4-B-1-b)

Findings

The strength of CAMPFIRE to date has been its success in allowing producer communities access to part of a market-led revenue stream created by the hunting industry (Table 10). This industry is

driven by impressive international demand. Most alternatives for diversification will not be as financially rewarding as wildlife, and as such the RDCs will probably be less interested in promoting them.

Marketable non-wildlife resources on communal lands include forage timber, sand, granite, slate, and woodland products such as wild fruits, bark, scenic sites, certain herbs, palm and grass thatch, Mopane worms, crafts, and butterflies. Many of these products are already subject to lively, informal sector entrepreneurial activity, little of which is regulated and almost none of which is taxed by the RDCs (timber being the obvious exception, subject to FC oversight). The extent to which these products are abundant is also highly variable. Some, such as timber, are not abundant at all. WWF socioeconomic studies indicate that communal land resources provide for about one-third of a household's subsistence needs. (WWF 1997)

Different natural resources provide different benefit streams. The greater the profitability, the greater will be the interest of the RDCs in exerting control for their own financial objectives/needs. Wildlife concessions have been profitable, and the RDCs have a vested interest in satisfying the rural populations who are capable ultimately of undermining this resource. The greater the share of benefits the RDCs provide to their local communities, the greater are the chances the resource will continue to be important into the future. Many alternatives that are not of major importance to the RDCs will nevertheless be important at the ward and village levels.

Minerals (black granite, sand, slate, and alluvial gold) are not renewable natural resources, but they can be used slowly over time or mined quickly for immediate profit. The RDCs will find that the wards are important constituents in determining the long-term use of such resources.

Some indigenous resources are very site-specific, such as scenic views, caves, ancient cave art, bat guano in caves, cultural tourism, and rivers or streams, ponds and dams. These resources are located at the level of a village or group of villages, or even at the ward level -- and should not be seen as major sources of RDC income. Exploitation of these kinds of resources will, however, help small communities develop micro-enterprises. Sustainable marketing structures grouped at the ward or district levels through cooperative structures can serve such enterprises.

Table 10: 1996 Campfire Generated Income (Wildlife)

District	Chron/Rank Month/Year	Income Z$ 1996	Income Rank	AID Z$ to 2/98	AID $ Rank	AID Z$ Spent	% Spend W/V Level	Date of Grant	Percent Rank of Incomes Sample	Rank	Percent
Beitbridge	2	588700	9	1483280	5	391597	0	7/97	4461969	1	100.00%
Binga	2	2130674	3	1698700	1	0	59	2/98	3015112	2	94.74%
Bulilima-Mangwe	2	574615	10	1293200	10	0	44	2/98	2130674	3	89.47%
Cham./Shamva	8	18000	19	0	21				1319277	4	84.21%
Chimanimani				1381000	7	0		2/98			
Chipinge	3	278979	12	826980	18	498802	50	11/96	1317820	5	78.95%
Chiredzi	3	1319277	4	1218850	11	340020	78	7/97	1244726	6	73.68%
Gokwe North	3	950509	7	774777	19	460867	39	11/96	950509	7	68.42%
Gokwe South	3	52000	16	0	21		na		730568	8	63.16%
Guruve	1	3015112	2	1695500	2	499319	0	10/97	588700	9	57.89%
Gwanda	5	100000	14	1592650	3	0		2/98	574615	10	52.63%
Hurungwe	9	1244726	6	917860	15	583638	50	11/96	397476	11	47.37%
Hwange	2	730568	8	0	21		50		278979	12	42.11%
Kusile				1493300	4	0		2/98			
Matabo	4	60000	15	0	21				110400	13	36.84%
Mazowi				673000	20	389284		11/96			
Mudzi	11	110400	13	1187910	12	605464	8	6/97	100000	14	31.58%
Muzarabani	2	397476	11	1348428	8	505608	0	10/97	60000	15	26.32%
Nkayi				874020	17	429059		11/96			
Nyaminyami	1 8/94	4461969	1	913600	16	470077	18	5/97	52000	16	21.05%
Nyanga	10	6000	20	1340040	9	0			44488	17	10.53%
Rushinga	12	44488	17	1403505	6	697347	0	6/97	44488	17	10.53%
Tsholotsho	2	1317820	5	1014710	14	449466	60	6/97	18000	19	5.26%
UMP Zvaitaida	9	44488	17	1104920	13	551881	0	6/97	6000	20	0.00%
Totals:		17445801		24236230		6872429			17	0.00%	

Table 11: Diversification in Economic Benefits Through Exploitation of Natural Resources (Actual and Potential) Among Campfire Association Producer Communities

Number and Date**	District	Total # Of Wards	# Wards Receiving Dividends	1996 Campfire Income***	% '96 Income Returned Communities	Approp. Authority?	Eco-Tourism	Live Animal Sales	Misc. Options	Misc. Options	USAID Support?
1, 1989	Guruve	28	11	$3,015	0	Y	Y	Y	Forest Products	Masawu fruit, Bamboo,Beekeeping	Y
2, 1989	Nyaminyami *	16	10	$4,462	18	Y	Y		E.D. Paper Making	Grinding Mills, Impala leather articles	Y
3, 1991	Beitbridge *	18	6	$589	0	Y			Grinding Mills, Irrigation	Ilala Palms, Mining, Sand, Stone Carving	Y
4, 1991	Binga	27	20	$2,131	59	Y			E.D. Paper Making,Impal leather	Grinding Mills	Y
5, 1991	Bulilima-Mangwe *	33	7	$575	44	Y	Y		Mopane Worms, Amarula	Silk Worms, Conservancy Camp, Dam	Y
6, 1991	(Gaza) Chimanimani	28	0	$1,319	na	Y			Fisheries, reptiles, amphibians	Ilala Palms, Babobab rugs, butterflies,forestry	Y
7, 1991	Chipinge (Gazaland)*	33	2	$279	50	Y	Y		Amphibians, reptiles, butterflies	Ilala, forestry. Baobab rugs, Ostritch, T.Village	Y
8, 1991	Chiredzi *	32	9		78	Y			Grinding Mills, Vetiver	E.D. Paper Making	Y
9, 1991	Gokwe North	25	4	$951	39	Y	Y				Y
10, 1991	Gokwe South *	28	6	$0	na	Y			Fisheries, Forest Products		Y
11, 1991	Hurungwe *	40	9	$1,245	50	Y	Y		Grinding Mills, Croc.Eggs	Bat Guano, Forest Products, Beekeeping	Y
12, 1991	Hwange *	27	14	$731	50	Y	Y		Croc. Eggs, Rafting	Hides, Hot Air Balloons	Y
13, 1991	Muzarabani	17	10	$397	0	Y	Y	Y	Forest Products	Masawu Fruit, Bamboo	Y
14, 1991	Tsholotsho *	20	8	$1,317	60	Y	Y		Forest Products, Ostrich	Mopane Worms,Beekeeping	Y
15, 1993	Bubi	12	1	$0		Y					Y
16, 1993	Chaminuka/Shamua	26	2	$0		Y					Y
17, 1993	Gwanda *	20	6	$100	na	Y	Y		Croc. Eggs,Cave Art. Alluv.Gold	Game Fishing, Amarula,Cattle Ranching	Y
18, 1993	Marondera	24	0	$0		Y					
19, 1993	Mazowe/Chiweshi	29	5	$0		Y					Y
20, 1993	Mudzi	18	2	$110	8	Y	Y		Ostrich		Y
21, 1993	Mwenezi	31	0	$0		Y					
22, 1993	Nkayi	23	6	$0		Y					Y
23, 1993	Nyanga	37	1	$0		Y	Y		Forest Products	Beekeeping	Y
24, 1993	Rushinga	17	0	$44	0	Y	Y		Ostrich, Slate	Masawu Fruit	
25, 1993	UMP Zvaitaida	15	2	$44	0	Y	Y		Forest Products	Beekeeping	Y
26, 1994	Kusile/Lupane	24	11	$0		Y					
27, 1996	Buhera	30	0	$0		N					
28, 1996	Chikomba		0	$0		N					
29, 1996	Goromonzi	26	0	$0		N					
30, 1996	Matobo	26	4	$0		Y					
31, 1996	Mutoko	29	0	$0		N					Y
32, 1996	Pfura/ Mt. Darwin	29	0	$0		N				Black Granite	
33, 1996	Wedza		0	$0		N					
34, 1997	Manyame		0	$0		N					
35, 1997	Umguza	16	0	$0		Y					
36, 1997	Umzingwane	14	0	$0		N					

* = Field Visits by Evaluation Team

** = Date when District Joined Campfire Movement

*** = Sport hunting, Tourism, PAC hides/ivory, Other, in millions of Z$ (Z$16/1$US)

The following observations address the ongoing diversification efforts:

- Table 11 presents a compilation of information garnered from team field visits, discussions, and a review of the literature on the range of "alternative" and natural resource "diversification" options. It makes a number of interesting points. The wildlife-rich Rural Districts were the first to join CAMPFIRE, since sport hunting was CAMPFIRE's initial focus. The order in which the RDCs have received Appropriate Authority correlates with the order of importance this resource held for the concerned RDCs, and by extension the selected wards having wildlife within their borders. Most of the actual or potential diversification efforts fall within these same wildlife-rich districts. Those Rural Districts with little or no wildlife dividends seem to have received less attention for micro-enterprises revolving around sustainable use of renewable natural resources.

Most of these resource options remain a "gleam in the eye" of local people. The reason is that either the State is unlikely to move quickly to liberalize policies that would make a resource accessible or taxable by local governing units (as in the case of minerals), or exploitation of the resources requires a level of management beyond local means. Examples are:

(1) *Forest resources.* The Rural Districts vary greatly in terms of the flora/fauna they have available, which are usually grouped on the basis of annual rainfall, elevation, and soil quality. Commercially valuable stands of timber on communal lands are widely dispersed but not rare. Particularly valuable trees that are harvested for their timber in many Districts include mopane, pod mahogany, and the "wooden banana" tree. In many Districts where these trees are abundant, the RDCs sell them via concession by the RDCs, in cooperation with the FC. The FC sets the terms and conditions of timber exploitation and monitors what is done. The concessionaire pays an agreed upon fee per meter of wood taken. In Hurungwe, the RDC recently gave a timber concessionaire a permit to cut all three of the above species *anywhere* within the District, as long as the diameter is greater than 30 cms. There is no quota. Cutting is to begin all along the river below the Ward Tourist Campsite. As with wildlife revenue, each ward in which trees are cut receives 85% of the concession receipts. The evaluation team met the loggers, who were setting up several sawmills in the District. They referred to the cutting as "salvage cutting." Both the ward and the FC have assigned people to stay with the woodcutters at all times to monitor the off-take.

There has been considerable documentation of "revenue-seeking" RDCs granting concessions to remove trees wherever they are found -- farmer's fields, villages, woodlands surrounding villages -- over the strong objections of, and even near violent confrontations with, concerned local communities. "While tenurial relationships are complex in communal areas, there is a sense that the traditional situation in which any community member had rights to trees, even in other people's fields, is now being supplanted by a form of customary law where rights are held by a farmer who is perceived as the 'owner.'" (Clark Bird, et al., "Was Mrs. Mutendi Only Joking: Access to Timber in Zimbabwe's Communal Areas," *IIED* 1995:5) In the referenced case study, Mrs. Mutendi was demanding, from the RDC, the

money realized from the sale of the timber removed from "her" trees in her fields. This is an indication of what may be occurring across the country, as local communities become more assertive over what they perceive as their legitimate rights over natural resource exploitation.

(2) *Mopane.* Where there are extensive numbers of mopane trees, communities have the option of harvesting Mopane worms. Where there are extensive semi-arid and more humid woodlands, bee-keeping is always a good option. Woodlands include grasses that can be harvested for roofing, as well as traditional medical plants. They may also include commercial quantities of amarula and msawu fruit, the latter being largely exploited by the informal sector. Hundreds of tons of both are exported fresh each year from the country. As with amarula, the wild masawu fruit provides a sought-after liquor and is found throughout the Zambezi valley.

(3) It is evident that local communities are not yet benefiting as much as they might from wildlife other than through the dividends from sport hunting. Live animal sales are not yet producing significant income and perhaps are beyond the management ability of most producer communities, although two have been selling roan and sable antelope. Local producer communities have not conducted any meat cropping, although they do culling. For example, Nyaminyami District has an annual quota of 1,500 impala to be culled from their large herds on communal lands.

Some Rural Districts have ecotourism/photo-safari concessions with hotel safari lodges, using the wildlife reserves located along their borders. The team visited Chilo, Hwange, Bumi Hills, and others and noted the substantial and developing potential at these sites. CAMPFIRE is beginning to get more involved in such conventional game-viewing tourism enterprises. International trends in tourism are favoring Zimbabwe and the wildlife/recreational experiences CAMPFIRE offers. There is much less experience with cultural tourism in Zimbabwe or with CAMPFIRE development of archeological, historical, or botanical sites. The tourism based in CAMPFIRE areas in the southern low veld is not yet breaking even, but the first distributions from CAMPFIRE lease agreements with major hotel operators are underway. While Zimbabwean tourism, based primarily on wildlife and the attraction of Victoria Falls, is generally doing well, that based in CAMPFIRE areas has yet to demonstrate viability in all regions. In particular, cultural, archeological, historical, and botanical tourism are virtually untried concepts in these areas.

Bumi Hills/Nyaminyami Case Study

Sun Hotel's Safari Lodge in Bumi Hills has had a long-term (30-year) series of photo-safari leases with Nyaminyami District through the Ministry of Local Government. Each lease is good for 9.9 years and must be renewed at that time. The lease gives Sun Hotel exclusive visitor rights to the nature reserve. Every year the Lodge gives a lease "rent" of about Z$70,000 (US$4,375) to the RDC. On top of this, another Z$ 250,000 (US$15,625) plus or minus -- depending on the actual number of guests -- is given by the Safari Lodge to the RDC, with the intent that the funds go to the Mola Ward, which is adjacent to the 50 sq km concession and is very rich in wildlife and elephant. The Safari Lodge manager also claimed that they have provided funds on occasion to pay the salaries of the adjacent ward game scouts. The RDC has specifically informed the Safari Lodge that the Lodge

cannot deal directly with the Mola Ward or give funds directly to them, as the distribution is the business of the RDC. In a meeting with the RDC, at which Mola Ward representatives were present, the general manager of the Safari Lodge asked them directly why they continued to snare animals as they do -- given the financial assistance the Lodge had been giving them over the past 15 years. They were not being good neighbors. The ward members asked, "What money?" They had never received or even known that the Lodge had been giving this money to the RDC all these years on their behalf. There is no transparency in the financial accounts within the District for members of the various wards. Sun Hotels claims to fear making an issue of this, given the RDC's authority over the lease, which is up for renewal in a year. The final observation was that Safari Lodge is reconsidering the sum of about Z$250,000 they have been giving of their own free will for the adjacent ward and may stop this practice as they see no positive results.

The Safari Lodge desires a good relationship and partnership with people in the adjacent ward because they experience poaching/snaring problems. They want to tell their customers that the local people receive part of their lodging expenses ($5/person/day) to help conserve this wonderful wildlife. The guests have often given special gifts to the villages in Mola Ward, particularly helping to build school blocks and equipping them, and also putting fencing around the schools. Legitimate sport hunters' guides from the adjacent ward will sometimes lure animals (leopards and lions) across into their territory (there is no fence or buffer area). The concession, which has been in effect for more than 15 years (several renewals), has repeatedly asked for a 5 km buffer zone between the Wildlife Nature Reserve and the hunting area -- without success. For this reason, Bumi Hills Lodge has put radio-collars on many animals and tracks them. The matriarch elephant of the concession has one and is tracked carefully to keep her from crossing over and probably being shot. When collared animals become immobile, a patrol goes out to check for snares. A review of the 1995/1996 audit of income from Nyaminyami shows Z$102,664 for a "bednight levy," probably the annual lease receipts. No income line item shows anything close to the amounts the Safari Lodge reported giving, unless it is subsumed under "sundry income" of Z$289,546 -- money intended by Safari Lodge for the population of Mola Ward. However, the RDC does *not* consider these funds to be "CAMPFIRE Revenue," a portion of which should be given to the ward directly bordering the small wildlife area the Lodge depends upon.

Nyaminyami District is one of the two original Districts in CAMPFIRE -- having received Appropriate Authority in 1988. Its Z$4,461,969 (US$278,873) from wildlife sport hunting placed it at the top of the CAMPFIRE revenue list in 1996 (that figure does not include ecotourism-type income, which the RDC does not count as "CAMPFIRE revenue"). Ideally, the RDC should transfer 80% of these funds to producer communities to reinforce the conservation ethic and provide economic benefits to the communities that are most touched by the presence of this wildlife (damage to crops and danger to life and limb). One year Nyaminyami District gave back only 18% of the wildlife revenue to its communities and put Z$1,131,371 into its "surplus account," to be carried over to the next year's budget, a sum that could have been given to people in the producer communities as direct benefits. It is obvious that in a district more than 100 km across (width/length), small benefits received in one corner will not have much impact on wildlife/human interaction problems in another. This dilution of benefits is sobering to the CAMPFIRE movement and does not bode well for the future if other RDCs follow their lead in reducing the benefits to producer communities.

Bumi Hills Safari Lodge noted that people in the District have no idea of the kind of revenue non-consumptive photographic safaris bring them. Not only do they produce revenue for the District and ward through the lease levies and funds given for ward distribution, but the Lodge employs 150 people from the community in permanent positions and pays for social security and other benefits. Safari hunters, in contrast, generally employ less than 10 people, and then for only a limited time and with no benefits.

Conclusions

There are valid options for diversification and new economic benefits for rural producer communities using other natural resources, although few will be as profitable as wildlife in the areas where it is abundant (Table 11). Mining and timber are the exceptions. These are often profitable activities, with strong connections to world and regional markets. If the CA and CCG members can get the mining and timber industries in Zimbabwe to apply the revenue-sharing concept of CAMPFIRE, they will have accomplished much.

Even some lesser resources may have high potential niches. Zimbabwe's commercial honey exports reach US$10 million a year. It is easy to imagine a "CAMPFIRE" brand organic honey being marketed internationally.

The Councils and CA may be overly optimistic about the potential for ecotourism as a CAMPFIRE revenue-producing sector. There are places where ecotourism ventures are possible and might attract trekkers and backpackers, but the investment will need to be based on careful niche market development and strategic involvement with the private sector.

Currently, CAMPFIRE does not tap into the Zimbabwe tourism sector in any coordinated manner, and CA management is just beginning to think strategically about the sector. The CA Board has no members from the hotel association, the Zimbabwe Tourist Authority, or related organizations. The CA and RDCs are beginning to develop some capacity to negotiate lease arrangements for effective communal, private sector partnerships involving tourism.

Management Capacity. CAMPFIRE and NRMP II possess the breadth and depth of experience and competence needed to expand programs into other natural resource and/or indigenous cultural resources. To do so, however, they must focus on a few target districts and/or wards within districts where there is real potential for success and then to engage the professional expertise (private sector, NGOs, and government) required to put an active program into place. When solutions are refined and successful economic/commercial chains established, and other RDCs learn from the experience gained, they will in turn replicate the models. The target districts/wards should be located in areas where wildlife is not already a major option.

In most instances it appears the RDCs would be better off leasing their scenic areas to industry entrepreneurs and improve their negotiating skills to produce deals that are favorable to the producer communities in those scenic areas. Similarly, NGOs that think they have a good prospect and cooperation in a producer community should try to facilitate the creation of enterprises. However, grant funds should not be used to subsidize the *operations* of such enterprises. A possible role for the RDCs and CCG members is to help monitor and improve the existing tourist leases of major hotel companies on district land, and through publicity encourage these companies to make good on promises to producer communities.

Not enough care has been taken in evaluating the capacity of the Rural Districts to finance their

minimum CAMPFIRE staff (coordinator, game guards, and/or monitors) out of their own revenue. This works against sustainability.

Considerable uncertainty surrounds the economic viability of resource management strategies on communal lands in the CAMPFIRE areas, both because of the insecurity of tenure of the resources and uncertain knowledge about the production functions for most of the resources that might be more intensively managed. In many areas, the economic value of most of these other resources is not great, and the gains from improved management depend on restricting open access. Where significant economic value is to be found in alternative resources, the communal area residents are already exploiting that value. Any as-yet-untapped potential is likely to be less lucrative than safari hunting. Nevertheless, it may still offer some increase in prosperity for communal area residents. That possibility, however, poses a contradiction. Better management of these resources for collective interests is possible and necessary, but their economic value is more local. From the point of view of the RDCs, there is no significant incentive either to take action or to share the eventual revenues with producer communities. The required management activities are more likely to be of the social forestry and land-use conservation planning type, rather than of market-led activities such as safari hunting, hotel operation, commercial logging, or mineral extraction.

Natural resources such as forests and minerals that do not move around are easier for an RDC to control for its own ends/needs and to use for general district operating costs. Since local populations can destroy trees, forests resemble wildlife in the kind of approach needed to sustain them. Local communities should receive a very significant portion of the benefits from forest resources, both exotic and indigenous. Where natural forests exist, some micro-enterprises based on resource use, such as woodworking, traditional medicines, Mopane worms, beekeeping, and other forest products, become natural options for support to move from subsistence to sustainable commercialization. Household/extended family-managed and controlled wood lots for personal and commercial exploitation might be encouraged over communal wood lots where there is no owner, but this approach is difficult to implement within existing land policies.

Recommendations

Diversification efforts should focus on those Rural Districts (or wards of Districts) where wildlife is *not* abundant. These areas should be the target of the long-term close-out efforts of USAID in the coming years. Such assistance holds out the promise, if centered around a short menu of potentially economically sustainable alternative natural resource activities, of building enough RDC capacity to sustain a small staff of CAMPFIRE support personnel for the District.

Under CA leadership, the CCG needs to take a more creative and proactive stance toward the development of tourism activities that benefit CAMPFIRE communities. "CAMPFIRE Tourism" needs to be fostered as a powerful marketing and revenue-generating tool:

- The CA should establish strong ties with the Zimbabwe Tourist Authority (ZETA), domestic and international tourism hotel and tour operator associations, and private hotels and hotel

associations. As discussed elsewhere in this report, the CA Board could invite tourism industry professionals to serve on the Board. The CA should lobby the industry to hire CAMPFIRE community residents and to buy locally, when possible.

- The CA should work with the ART to monitor and form strategic alliances with other tourism associations in the region, such as the Southern Africa Tourist Organization. ART might also help CAMPFIRE establishments get listings in travel guides such as the *Lonely Planet Guide*, which already features some CAMPFIRE sites.

- USAID/RCA should assist the CA and ART in strengthening their regional contacts and alliances regarding ecotourism information, studies, lessons, and institutions.

- The CA should move, without delay, to copyright and register CAMPFIRE to create a CAMPFIRE "brand" name that members can use to establish standards, and market and raise funds.

- The CA should establish a visitors information center in Harare to assist adventure and ecotourists, as well as business and professional visitors. CAMPFIRE documentation, curios, and crafts produced by CA members throughout the country could be sold at this location, making it self-financing.

- CASS (or ART) should carry out sociocultural and economic impact studies of those sites where tourism is being developed and assist the CCG to adapt its ecotourism strategy. This effort should begin immediately by extending Bond's 1997 work through a study of existing tourist facilities located in CAMPFIRE communal areas and covering the extent and impact of local employment, local purchasing, and lease terms.

- WWF should continue its involvement in ecotourism development and marketing.

- The CCG should make sure the RDC and ward-level"customers" have usable guidelines for reporting and developing ecotourism.

Micro-enterprise and alternative NRM development activities should be targeted for Rural Districts that are not yet financially able to cover the basic minimum support needed for local CAMPFIRE implementation (CAMPFIRE coordinator, game scouts, and logistic expenses, and possibly game guards where more revenue is available). Twenty-four of the 36 CAMPFIRE RDCs fall within this category (Table 2). Within the other 12 better-off Districts, there are still many wards without CAMPFIRE revenue. The efforts in such Districts should concentrate on those wards, rather than on the ones with significant CAMPFIRE wildlife revenue.

Significant, increased attention must be given to assuring sustainability of the wildlife resource where it is most abundant and where CAMPFIRE wildlife revenue is still very sizable. Sustainability of this resource in the *wards* must be given greater priority over the efforts under

the NRMP II and the general Programme to diversify into other areas. Table 2 clearly shows the tendency to work for other options in areas where wildlife revenue is already significant. However, issues such as habitat loss and increased population pressures are key problems in these areas, and the legislation/authority needed at the ward/community levels to control these problems *must* be identified and given due attention. Otherwise this real benefit will be lost while time is spent exploring other options that offer no assurance of significant financial return. These other options should be left to the ward communities themselves to develop, following the model they have already learned with wildlife.

The CA should look again at what it considers to be "graduated" Rural Districts. A minimum and perhaps sustainable financial criterion for graduation could be any District that can pay for its CAMPFIRE coordinator and game scouts and maintain a minimum operating budget. Sufficient funds to accomplish this should be found within 20% of the District's CAMPFIRE revenue -- with the balance thus available to concerned wards. The RDCs should be encouraged to give the wards the money to employ game scouts (out of the 20%) and let this responsibility be handled entirely at the ward level. Table 2 shows that most of the first CAMPFIRE Districts have already met this graduation threshold. In fact, many of them already pay for these positions out of their own dividend revenues.

Community-led projects using ward dividends should be considered to a larger extent for income-generating activities involving sub-groupings of the community. These could be oriented toward some kind of internal loan program (or such a revolving fund) that would enable individuals or local enterprise groups to find funding to initiate micro-enterprise activities. Ward-level capacity-building should include helping communities explore these options. Income-generating activities at the communal ward-level may ultimately fail, as no one would actually "own" the enterprise and "open access" would not be adequately maintained.

Evaluation Issue: New Institutional Partners to Meet CAMPFIRE's Diversification Initiative. *The CAMPFIRE Association long-term plan has identified five strategic thrusts, of which one is "**the diversification of CAMPFIRE Principles to other resources in addition to wildlife.**" CAMPFIRE diversifying into new resources requires new partners and modalities. To what extent do woodland management, habitat monitoring, policy, tenure and economic considerations require attention to support diversification?*

Findings

The CA is actively engaged in a strategy of diversification of resource management strategies to enhance benefits accruing to its membership. This initiative is young and still has not gone much beyond the stage of planning efforts, feasibility studies, and a few pilot programs at the field level. These ground-breaking actions appear to have given CAMPFIRE an undeniable start on the actual capture of revenue streams. Already non-consumptive wildlife revenues are developing momentum, with tourism leases, direct ventures, and business ventures such as crocodile/egg farming as sources of revenue. The diversification thrust is customer-oriented, with the CA attempting to channel

resource revenues, e.g., timber and minerals, to the local level:

> *CA will seek to expand "CAMPFIRE" principles to other resources...this...will require the existence of legal instruments that will permit members of the CA and their respective communities to utilize various other natural resources....* (CA 1998)

The CA strategy involves a push to get policies in place such as Appropriate Authority mechanisms for other resources, to promote NRM diversification of activities, and to enhance cooperation and collaboration with selected partners. This latter point is the subject of the following remarks, which address the CA's recent incorporation of new partners into the CCG.

Forestry Commission. The FC is a parastatal with statutory responsibility for the forests of Zimbabwe. Of Zimbabwe's 39 million ha of land, 25.8 million ha are forests (using the FAO definition of 10% crown cover). Of the total forest area, about 8 million ha are on communal lands. Another 8 million ha are demarcated as "indigenous forests," which are found mostly in Matabele North Province in the Rural Districts of Lupane, Tsholotsho, Binga, Bubi, and Gokwe.

The FC's Social Forestry Division has submitted a workplan to the PET that asks for Z$3,010,000 for the period April 1998 to September 1999. It plans to enhance the economic contribution of woodland resources by training community personnel and developing community woodland action plans and natural resource by-laws. The forestry plan would include policy studies/research to create enabling legislation for community participation in the management of woodland products (including apiculture).

The Division of Forestry Extension, likewise under the FC, provides forestry services on communal lands. The services include woodland management, but most efforts to date have involved either agroforestry or been woodlot-related. Woodland management has been initiated on state forest lands (e.g., Mafungabusi Forest). There are 8 provincial forest extension managers and 55 forest extension officers in the Rural Districts. The FC states that it is "thin on the ground" and that, if it had the resources, it would increase personnel in the Districts. The FC does not have the funds to hire staff, as donors typically fund operations and not personnel. The FC gave conflicting signals with regard to its intention of joining the CCG.

The team visited one of the Mafungabusi Forest committees. The committee members appreciated their forest access to firewood, mushrooms, Mopane worms, and some thatch, but felt the arrangements granting them the "forest-sharing" rights were part of an ongoing process that would lead to a larger share of the resources and greater long-term assurance of their access.

The Rural District Council (RDC) Act of 1988, the Communal Land Act of 1982, and the Communal Lands Forest Produce (CLFP) Act of 1928 cover the use of forests on communal lands. Through the RDC Act, the RDCs may formulate by-laws to protect and manage the trees on communal lands. The Communal Lands Act overrides the power of chiefs to control the land and provides for land-use planning. Only a few RDCs have used these Acts to manage forest resources or legitimize local-level

resource management initiatives. The CLFP Act is commonly used to prevent large-scale commercial operators from poaching in communal land forests. It permits the RDCs to license commercial concessionaires to cut down trees, with the revenue going to the RDCs. The Act permits only "own use" of forest products by local people and proscribes the movement of forest produce from communal lands. The Act is not used to prevent local traffic in raw material for carvings and other products from the forests, nor is this traffic of much concern to the officers who enforce the Act. The extension foresters have little opportunity to influence local uses of the forest, but the RDCs are encouraged to use them to plan commercial cuts for a fee. Management believes the RDCs should be plowing the proceeds back into village infrastructure, as CAMPFIRE does with the revenue from wildlife. However, FC management does not believe there is much commercial potential in communal land forests.

The demarcated indigenous forests of Matabele North are used for wildlife tourism, including hunting. The FC has its own Safari Company and also leases competitively to other safari operators. FC management estimates that the wildlife in these forests produces ten times the revenue that would derive from commercial harvest of the trees in the same forests. The CAMPFIRE principle is of interest to the FC in these forests because neighboring villages are inclined to settle in them. FC management reasons that if they share the revenues from the forests with the squatters, the squatters can be persuaded to move back to the communal lands and stay there. "To the extent USAID would support them in efforts to coexist with communal peoples," they have submitted a proposal to work on forest management in communal areas. However, they only consider these efforts to be CAMPFIRE to the extent they take place in CAMPFIRE wards. There are two reasons the FC limits what it calls CAMPFIRE. The first is the use of a geographic distinction for programming purposes. CAMPFIRE activities take place in CAMPFIRE (i.e., wildlife-rich) villages and wards. In non-CAMPFIRE areas, the FC prefers to maintain an administrative distinction that has financial and donor-related implications. Second, the FC is engaged in experimentation with different models of "forest sharing" with local communities, and the areas covered are defined by watersheds, cultural groupings, and other factors that do not necessarily correspond with CAMPFIRE and RDC sub-district structures. In one case where safari revenues from state forest lands were to be shared with the local population, the villages rejected becoming part of CAMPFIRE. They perceived its revenue-sharing formula to be less in line with their interests than a direct arrangement with the FC would be.

One of the problems in NRM is the various uncoordinated laws that bear on natural resources. They have been described as a bad jigsaw puzzle in which some pieces are missing and others do not fit. Presently an effort is underway to develop omnibus natural resources legislation. Each of the natural resource agencies has provided input. The Canadian International Development Agency (CIDA) is assisting with the effort. The Cabinet has already approved a package, which is expected to be through Parliament by June or August 1998. Reportedly it recognizes indigenous knowledge, changes the rights over communal lands from usufruct to commercial, and recognizes property rights on communal land.

Department of Natural Resources. Until recently, the DNR had been involved with CAMPFIRE only through its attendance at meetings and workshops. Now, "however, with the

introduction of diversification policy in CAMPFIRE, the need has arisen for DNR to be involved as utilization of all other resources which DNR specializes is envisaged." (DNR 1998)

The DNR operates under a Natural Resources Board and various Conservation Committees. It has the principal responsibility for implementing the Natural Resources Act and is involved in efforts to harmonize various legislation related to the environment and the management of natural resources. Prior to independence, there were Tribal Trust Land Conservation Committees and Tribal Land Authority in Communal Areas. Both of these tribal land entities were neglected. The DNR now wants to use its resources along with CAMPFIRE to accomplish natural resource conservation goals on communal lands.

The DNR is the responsible authority for insuring the completion of environmental impact assessments (EIAs) and compliance for development activities. This role is likely to become more important with the passage of new legislation under the pending Environmental Management Act. The requisite EIAs under this legislation will move the DNR into a prominent role in NRM issues involving significant development actions, as will be the case with CAMPFIRE infrastructure projects.

The DNR will bring experience with CBNRM into the CCG. It has been involved in efforts to operationalize the National Conservation Strategy through the District Environmental Action Plan (DEAP) Programme. Like CAMPFIRE, the DEAP is based on principles of community participation and empowerment in NRM. The experiences of DEAP to date, although limited, are relevant to the land-use planning concerns discussed above. The DNR also implements activities under two Agenda 21 efforts, the National Action Programme (anti-desertification) and the Biodiversity Program.

The DNR's Integrated Resources Information System, a GIS-based environmental information database with monitoring functions, is relevant to CAMPFIRE's needs to improve its habitat monitoring capacity and to USAID's intentions to develop an integrated environmental monitoring indicator for its SO1 (see. V.C).

To assist with its diversification initiative, the CA formally invited the DNR's participation, and USAID has agreed in principle to support its involvement. The workplan the DNR submitted to the CCG has five goals:

(1) Establish and build the capacity of a CAMPFIRE Unit in the DNR.

(2) Advise on Environmental Impact Assessments (EIA).

(3) Enhance the capacities of local communities and local groups in NRM. It says it is devolving responsibility and staff to the Rural District level.

(4) Assist in carrying out Natural Resource Inventories, and facilitate sharing of information between the DEAP, the National Action Plan (NAP), CAMPFIRE, and a GIS database on the State of Environmental Resources (SOER).

(5) Assist in creating an enabling environment for CBNRM in Zimbabwe.

Southern Alliance for Indigenous Resources. SAFIRE is a "Zimbabwean development agency dedicated to the development of rural self-sufficiency through the improved management of natural resources." Its major focus has been to "build on the achievements of CAMPFIRE, and to promote economic development in communal areas based on sustainable and productive use of natural resources. It has woodlands and trees as its primary focus."

SAFIRE has been a member of CAMPFIRE since 1994, but to date has not received USAID funding for any of its activities. A project proposal before USAID at this time will make it one of the newest CCG members to have such support.

SAFIRE staff conclude that one reason for the threats to the sustainability of Zimbabwe's communal area woodlands, and the resulting lack of focus on this area, has been a widespread misunderstanding and lack of knowledge concerning the actual economic value of these woodlands to local communities. Without these woodlands, rural households would not be able to sustain themselves adequately. The rights regime pertaining to woodland resources does not acknowledge the potential economic contribution to woodland resources the rights would convey. (Zimbabwe Working Group, 1996)

SAFIRE proposes to provide substantial training and some pilot development of NRM approaches that rely heavily on "participatory reflection and action"[1] as a means of insuring that local communities identify with and own CAMPFIRE initiatives from the outset. The training component targets RDC executive and District-level officers from the AGRITEX, CA, DNR, ZimTrust, MLGNH, and other institutions.

Conclusions

The above remarks suggest that diversification away from safari hunting of wildlife can succeed as a major source of income in some places. Success, however, depends on strong links to the private sector. In other areas, diversification will likely mean social forestry-type activities and the micro-enterprises that go along with it. The CCG recently gained the social forestry and NRM background to undertake the different management specializations necessary for bringing forest and woodland resources more fully under the CAMPFIRE umbrella. Their prior and ongoing experience will reduce the 1-3 years of basic training, learning, and low-level experimentation that might otherwise be expected. Given the two years left of the NRMP II project, efforts to launch this diversification thrust need to be tailored and implemented to meet the eventual post-project circumstances.

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[1] SAFIRE uses this adaptation of the acronym PRA (usually signifying Participatory Rural Appraisal) to describe its specific approach.

The entry of the FC, the DNR, and SAFIRE into the CCG is a positive step toward bringing integrated natural resource planning, social forestry, and participatory land-use planning skills into the CAMPFIRE movement. As diversification of CAMPFIRE proceeds, it is important that each institution concentrate on high pay-off model sites that would highlight best practices and lessons for replicability. The addition of SAFIRE to CAMPFIRE brings new and important insights and experience to the issue of diversification. From a rather narrow focus on wildlife, new initiatives will take place involving other natural resources.

Recommendations

The environmental information systems and GIS efforts in the country need to be strengthened and harmonized. Although going beyond a narrow interpretation of CAMPFIRE, NRMP II support for such action is critical to the diversification effort. The DNR, under the Natural Resources Board's aegis, is the best situated to coordinate this action and assist the CA and CCG partners (especially WWF, FC, and DNPWLM) in developing synergy with a broader national effort. Data-sharing protocols, formatting standards, shared boundary files, and other areas need attention.

While diversification is important, NRMP II priorities must continue to include consolidation of the economic and NRM gains made in those Rural Districts that have significant wildlife resources and low population density.

Support to SAFIRE during the remaining time of NRMP II is highly desirable. SAFIRE field technicians should make it a priority within their NRMP II CAMPFIRE activities to help local communities develop proposals for economic ventures involving sustainable woodlands exploitation, to be submitted to banks or other local institutions for funding.

C. Advocacy and the International Context

As indicated in the SOW, in the run-up to the 1997 CITES Conference of Parties, "CAMPFIRE came under intense attack from a variety of animal welfare groups opposed to trophy hunting of wildlife, particularly elephants, and the resumption of the trade in elephant ivory." The debate over this issue, which ultimately played out in the US Congress, raised a number of matters of interest not only to NRMP II management but, more generally, to the US foreign assistance program. This section looks at the overall issue from three perspectives:

(1) Regional, international, and/or US-based advocacy for the down-listing of the African elephant and its appropriateness to CAMPFIRE and NRMP II;

(2) The role and results of ART's (and CA's) efforts in this area; and

(3) The USAID/Z Mission's response to the use of US funds for such activities.

Included under the second point above is an evaluation of ART's overall role and performance. As noted, ART's activities are broader than simple "lobbying"[2]; nonetheless, much of its activity is channeled into the advocacy roles it plays. NRMP II programming decisions were made on this basis.

Evaluation Issue: The Need for International Advocacy. *"Certain key project assumptions (SARP/NRMP II Document, p.9) refer to the internal economic, political, legal and technological situation in Zimbabwe. Certain other assumptions depend upon the international economic and political forces. One such assumption is that* ***the demand for wildlife products will support widespread development of wildlife as a form of land use*** *"* (SOW C.2.a)

Findings

According to *The Economist*, world tourism accounts for nearly 11% of gross global product and for more than one in ten jobs around the world. Moreover, it is growing at nearly 6% a year. Tourism in Zimbabwe has been growing at an annual rate of 10% a year since 1980, with European and North American visitation growing at 13% and 12% a year, respectively. European and North American visitors still comprise only 18% of total tourist visitation to Zimbabwe. The majority of the remainder are domestic or arrive from neighboring states. The market is by no means saturated.

The strength of Zimbabwe's tourism industry depends on stability and growth in the world economy and on Zimbabwe's ability to promote its comparative advantages. Involving both consumptive and non-consumptive uses, tourism also depends on the existence of a viable, intact wildlife habitat. Zimbabwe's ability to continue to expand its tourism at nearly twice the world rate depends, in some measure as well, upon the success of CAMPFIRE and other resource management programs in maintaining attractive opportunities for tourists to use and enjoy wildlife, cultural, and other resources.

In turn, establishing and maintaining wildlife habitat as a land use in Zimbabwe depend upon the demand for tourism.

Zimbabwe's revenue from sport hunting by foreign tourists has been growing by 18% a year since 1986. Although it accounted for about 90% of the income to the Programme between 1989 and 1995, there are signs that trophy prices are flattening out in real terms. Elephant hunting provides slightly over 60% of CAMPFIRE wildlife revenues. Notwithstanding the few examples discussed previously in this report, the local hunting markets for lesser species are virtually undeveloped.

Down-listing the African elephant from Appendix I to Appendix II of CITES has assured the continuation of the sport hunting of elephants. CITES restrictions on the sale of ivory and other

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[2] The term "lobbying," as used here, relates to host country, regional, and international advocacy activities. It does not include formal US government lobbying as prohibited under Office of Management and Budget Circular 122A (as revised). Therefore, the evaluation report is not making a judgement as to the legality of NRMP II activities undertaken in support of regional and international advocacy. Rather, the intent is to describe these activities and judge their merits in terms of project and development objectives. When reference is made to efforts to lobby the US Congress, for example, the report points out that these were clearly not funded by USAID under NRMP II.

elephant products are, however, reducing Zimbabwe's and CAMPFIRE's ability to generate additional revenues.

The US Endangered Species Act lists elephants as threatened. That status could have negative consequences for the economic value of elephants in Zimbabwe, as it enables the US Government, through the USFWS, to restrict trophy-related imports if it judges the resource to be exploited in an unsustainable manner. Were the United States to find negatively on the sustainability of Zimbabwean wildlife use, the US trophy hunting market, currently representing about half of Zimbabwe's total, could shut down immediately.

Conclusions

Demand for Zimbabwe's wildlife as a tourist resource seems assured, although the rate of growth in consumptive use may taper off as non-consumptive forms of wildlife tourism expand.

Diversification into non-consumptive wildlife tourism offers CAMPFIRE communities economic possibilities. As with other uses, geographic location and resource endowments are critical determining factors. CA producer communities have already demonstrated some potential and nascent capacity for undertaking cultural and ecotourism activities. They have also begun to negotiate revenue-sharing arrangements with game-viewing safari lodge operators. These are seen as a logical expansion of ongoing CAMPFIRE activities.

The international politics of wildlife are a definite threat to Zimbabwe's ability to market products in which it has a definite comparative advantage.

The GOZ's primary role is to assure that people have the incentives to protect the resources that are the basis for international tourism, that the industry is healthy and free to promote its products, and that the barriers to international trade are not increased unnecessarily.

Recommendations

The government must continue resisting the erection of barriers to legal and controlled trade in elephant and other wildlife products. However, it must also devote adequate resources to assuring responsible stewardship of both the public and private wildlife estate and effective safeguards for controlling the ivory trade.

This task should be complemented by government efforts to promote sustainable use of its wildlife products, both consumptive and non-consumptive, by allowing market forces to determine the balance and by encouraging an industry that can market wildlife tourism worldwide.

CAMPFIRE, with CCG support, should encourage government efforts and policies that reinforce the desire of producer communities to raise more of their revenue through improved market conditions. Increasing the local gain from tourism will further enhance conservation objectives.

USAID should concentrate the remaining NRMP II support for international promotion and advocacy on strengthening the ties between the tourist sector and the CA.

Evaluation Issue: CAMPFIRE, NRMP II, and International Advocacy. *"To what extent, if any, have NRMP II funds been used for lobbying, regionally, internationally and/or in the U.S. for the Down listing of the African elephant and the resumption of the ivory trade under CITES, the U.S. Endangered Species Act or for other positions with respect to U.S. legislation or international treaties or conventions. Considering the existing focus of CAMPFIRE activities, is "international lobbying" or advocacy for the promotion and development of natural resource product markets appropriate or justified? Is it appropriate to use U.S. assistance funds for such activities; have U.S. assistance funds been used for similar activities in other sectors?" (SOW C.4.b)*

Findings

About 92% of CAMPFIRE revenue comes from sport hunting. It is the revenue that CAMPFIRE communities have obtained from safari leases and through their commitments to conservation and improved NRM. International marketing of sport hunting is an appropriate and justifiable activity for safari operators, professional hunters, and other business interests. They pursue this regulated activity and its marketing individually or collectively, domestically and internationally. There is no obvious justification for NRMP II to engage *directly* in international market development or promotion of this controversial aspect of CAMPFIRE, and it is important to reemphasize that the funds do not come from NRMP II or from any other source of development assistance. At the same time, it may be justifiable to use USAID funds and CCG members to observe and monitor these activities. Even at the local level, CAMPFIRE does little more than assist communities with its negotiating strategies and various aspects of wildlife and habitat management (as discussed in section III.B.2).

Protection of existing markets from the politics of international wildlife conservation is another matter. The strongly differing views held by various decisionmakers require countries like Zimbabwe to participate in the political dialogue on CITES and other endangered species policies. As an important participant in Zimbabwe's wildlife markets, CAMPFIRE communities and their supporters have a real stake in decisions such as the elephant down-listing debate, resumption of the ivory trade, and regulatory actions affecting meat, hides, and other animal products.

CAMPFIRE communities are aware of the stakes and are pushing their NGO partners -- principally through the CA, with support from ART -- to represent their interests in pressing for changes that improve the economic conditions for their products *wherever and whenever appropriate.* Even in the controversial case of elephants, where coexistence with humans requires sacrifices, producer communities want to assure their right to make commercial use of their resources. One community with modest wildlife resources informed its elected CA Board member, as he left his community to attend the CITES COP meeting, "...if you don't succeed in getting us the down-listing, you'd better plan on emigrating." CAMPFIRE producer communities would suffer major losses in income if international wildlife politics prohibit their commercial use of wildlife.

CAMPFIRE participants are supported by other donors in addition to the United States.

Conclusions

An advocacy role is appropriate and justified for governments, which participate in the international politics of wildlife conservation. Government's devolution of Appropriate Authority to communities engages them directly and, thus, in turn, their NGO partners. In addition, CITES is as much NGO-driven as government-driven, further substantiating the appropriateness of Zimbabwean NGOs supporting CAMPFIRE to participate in the international dialogue surrounding the trade in wildlife products.

The development of international markets for other, less controversial natural resource products on communal lands may justify collective marketing or advocacy efforts by CAMPFIRE and its CCG partners.

If US assistance funds are given to support a commercial enterprise and the operators of the enterprise determine, jointly or separately, that it is in their economic interest to engage in international economic or political operations to maintain or widen their markets, it is not inappropriate for them to use US assistance funds, along with the other funds at their disposal, for such activities. What the NRMP II actually carried out in this regard was consistent with the project design.

The marketing and advocacy activities ART and the CA have undertaken fall within the norms of what USAID has actively supported in other sectors, such as in many export promotion programs for non-traditional agricultural products or for certified tropical timber products. CITES and other regulatory structures are legitimately the object of scrutiny as to whether they constitute non-tariff barriers to trade. Without taking either a technical or moral stand on trophy hunting of elephants, this conclusion reflects widely held US values grounded in fundamental beliefs about the importance of free trade, the democratic process, the rights of indigenous peoples, and the value of a vibrant civil society. As documented in the following sections, this philosophy is what underlies USAID's support for the international activities financed by NRMP II.

Recommendations

CAMPFIRE interests should participate fully, principally through the CA and ART, in the international politics of wildlife conservation to protect Zimbabwe's freedom to enjoy its comparative advantage in all forms of wildlife-based tourism.

USAID should not object to any legal use of NRMP II funds that is consistent with the project design and the precedents of change established through workplans, grant amendments, and the like. This could include activities that have an international political or economic dimension to them where their purpose is maintaining or widening markets.

USAID should continue to recognize the validity of the policy connection, spelled out in the project paper, between CAMPFIRE's international use of funds to protect markets and the economic success of NRMP II.

The GOZ and CCG should continue to use their own and a variety of funding sources to finance their involvement in these legitimate activities.

Evaluation Issue: The Role and Results of ART's Involvement in NRMP II. *"What has been the role of ART under NRMP II? What if any are the potential impacts on CAMPFIRE producer communities from its advocacy activities?"*

ART owes its existence to ZimTrust, with which it continues to share a Board of Directors. It was formed as a Zimbabwean welfare organization but was also legally constituted in the United Kingdom, the United States, and the Republic of South Africa. It emerged in part as a response to the negative publicity that the southern African wildlife programs were receiving in the period following the 1989 ivory ban and debate on the elephant issue at the 1992 CITES meetings. Rather than responding itself as a humanitarian development organization with a single country focus, ZimTrust encouraged the creation of ART. ZimTrust felt that the response to what were perceived as threats to the region's sustainable use programs would more appropriately come from a regional body with specific aims:

"Africa Resources Trust is a private voluntary organization dedicated to the alleviation of poverty in Africa through the sustainable use of wild species by rural communities. With headquarters in Zimbabwe, ART is a southern organization which aims to counter the traditional North-South flow of information. ART believes that informing the public and policy makers in the North is essential to successful sustainable development in the South." (ART 1997)

ART, which included *ACTION Magazine* at the outset, developed its capacities in four areas, which were utilized by and strengthened through NRMP II: (1) information outreach; (2) networking; (3) education; and (4) policy research and analysis.

When the NRMP II was being formulated in 1993-1994, USAID, to its credit, acknowledged that an advocacy role was critical to project success. ART was included in the CCG following its invitation to participate in a workshop on information and communication held in 1993. The June 1995 Plan of Operations defines ART's purpose in the CCG and NRMP II as taking action to create and maintain a "supportive international market environment for CAMPFIRE." This purpose, which depends on market conditions, conforms to the second of the nine key project assumptions, "that wildlife utilization can compete economically and financially with other extensive forms of land use." The NRMP II recognizes policy and regulatory factors *outside* of Zimbabwe as being critical to the wildlife-based elements of the program. Accordingly, its design provided that:

> During Phase II, ART will lobby for, and promote, CAMPFIRE interests among regional and international policy and regulatory organizations and interests- e.g. the Convention on

> International Trade in Endangered Species (CITES). It will also monitor international markets in wildlife products and conduct trade policy and regulatory analyzes in support of its international lobbying efforts. In addition, ART will facilitate international networking among similarly interested parties in Africa and throughout the world, to identify and develop market opportunities for program-generated products. Locally, ART will collaborate with the CA in the establishment and operation of the CAMPFIRE information service, and lobby on the program's behalf at the higher levels of Zimbabwe's government. (SARP 1994:40)

To support this role in the NRMP II, ART, which is funded through ZimTrust in what is described as a "holding company" relationship, was included as a contractor under the ZimTrust grant. As per the 1995 Plan of Operations, ART's technical outputs included:

- Monitoring, analyzing, and influencing important factors affecting markets, including selected national and international policy, regulatory organizations, and instruments;
- Developing regional and international support networks for CAMPFIRE;
- Monitoring and informing African nations;
- Assisting the CCG with the operation of an international CAMPFIRE information service;
- Informing and influencing key decisionmakers, media, NGOs, and academic communities in Africa, Europe, and the United States; and
- Challenging and countering arguments against sustainable use as practiced in conservation-based community development.

To assess ART's performance, the evaluation team conducted interviews with staff at its Washington office, discussed ART's role and CAMPFIRE with key staff within the Humane Society of the United States (HSUS), met and discussed the issues under debate with conservation NGOs (WWF, AWF, and IUCN), reviewed extensive letter files from others, interviewed staff, and reviewed USAID/LPA documentation, correspondence, and the related record of Congressional debate. The team also reviewed EU documents related to sustainable use, CITES, and CAMPFIRE. Finally, ART's Harare offices were visited, and key staff shared their experiences and work products with the team.

Findings

ART utilized US$1.168 million of NRMP II funds through December 31, 1997 to implement the work objectives as outlined above. ART successfully accomplished the mission the CCG and NRMP II defined for it and continues to carry out most of the same functions following the termination of USAID funding on December 31, 1997. In concert with the CA, ART has served as a public information arm of CAMPFIRE, reaching an international audience. It is presently replicating the information center for the CA and transferring direct management of the Internet website to the CA.

Advocacy, Monitoring and Policy Analysis. ART established offices in Harare, Brussels, London, Washington, D.C., and Johannesburg, all of which were active and functioning as of March 1998, three months after USAID/Z support to ART ended. The home office in Harare is staffed by 10 full-time staff and a variable number of volunteers. The offices are well-maintained and show clear evidence that the program areas described above are still being actively pursued. A new office director was recently assigned to ART's Washington office.

ART's activities underscore a rapidly widening and fundamental rift between conservation NGOs and animal rights advocacy groups. ART's own activities in advocating a southern Africa sustainable use perspective are a source of ongoing debate and direct confrontation with the animal rights movement. Initially, ART attempted to engage animal rights groups in constructive dialogue and possible collaboration. The fact that Zimbabwe hosted the last CITES meetings and that elephant down-listing was a major focus at the meetings drew ART into a highly visible political struggle for international influence. The Programme became a lightening rod for groups generally opposed to sustainable use initiatives, especially those associated with trophy hunting and elephants. The HSUS spearheaded a campaign to stop USAID support for CAMPFIRE, and ART's Washington office took on the role of coordinating a counter-response. Such an undertaking built on the strengths ART had acquired through NRMP II financing.

When the House and Senate Committees in the US Congress took up the issue of CAMPFIRE funding, ART was not using USAID project funds to support the lobbying efforts of its Washington office. USAID had already stopped funding to the Washington office, and ART had already begun using other funding sources for its Washington activities. This point is important because some of the activities undertaken could be construed as going beyond the provision of information and as involving an attempt to influence member votes. ART's response to the HSUS was remarkably effective (see Appendix J). It galvanized support and generated an explicit, supportive position on sustainable use from a range of more than 40 mainstream conservation NGOs. ART/W served as an information source and strategic ally to the embassies of the southern African states in Washington, helping them address their concerns to the Congressional offices most concerned with the debate. ART worked with the media, providing the arguments that supported sustainable use as an effective conservation tool and CAMPFIRE as an effective means of creating conservation incentives through local participation.

Information, Outreach, and the Media. ART established an information center that focused on international concerns of relevance to the CA and its member communities. It developed and initiated an Internet website that provides abundant information on the CAMPFIRE Programme, with the primary focus on the conservation and rural development aspects. Its orientation is one of providing public information, rather than technical networking.

ART monitored the print and broadcast media for content and supplied information to journalists and producers. The effectiveness of this work is evident, particularly in conveying an understanding of the complexities of sustainable use arguments in the written press. An ART-commissioned assessment of its European media campaign concurs: "ART/CA's media outreach activities are successful in

increasing media coverage...help stimulate further media discussion of CBNRM issues...Positive portrayal of sustainable use of wildlife has increased." (LeBreton 1997)

Among its achievements, ART assisted the British Broadcasting Corporation produce a documentary on CAMPFIRE that the evaluation team found to be very professional in terms of its accurate and direct portrayal of CAMPFIRE's true situation.

Networking. ART created databases of US, Zimbabwean, and other international persons and organizations with a supportive interest in CAMPFIRE, and tries to supply information through these networks on a regular basis. It has given the larger CBNRM database to the CA.

Education. ART conducted seminar/study tours in the region, as well as in the United States, Canada, and Europe (the latter was not US-funded) and hosted visits to CAMPFIRE communities by various groups. ART has produced a very powerful series of posters on elephant conservation that trace each of the key steps in the CAMPFIRE Programme.

Conclusions

ART's performance demonstrates the soundness of the original project design and indicates the need for continuing its services. ART's close collaboration with the CA membership helped decisionmakers understand the stakes in the 1997 CITES down-listing decision and was critical in obtaining support. Its close collaboration with SADC embassies and conservation NGOs in Washington and elsewhere was instrumental in creating a supportive coalition in favor of CAMPFIRE. While this effort grew out of its informational role, which was supported initially under NRMP II, the actual effort and lobbying took place well after USAID funding for ART's Washington office had ceased.

It may be difficult, given ART's strong stands and confrontational style, for it to attempt again to engage organizations with legitimate animal welfare concerns in constructive collaboration with the CCG, despite the scope for dialogue in such areas as PAC and animal population dynamics.

Recommendations

The CA should continue to utilize ART's services and, where necessary, collaborate with it to obtain the financial support needed for those services.

ART should continue to help the CA explore the international market for non-consumptive wildlife use, including game-viewing and cultural and ecotourism. A major or lead role in following regional activities would be appropriate in this regard. It is important that CAMPFIRE stay abreast of strategies and marketing techniques of potential use to the CA's membership. Related networking and facilitation of cross-country visits and other strategic encounters would also play to ART's strengths.

ART should work with CCG members, especially the CA, to use the Internet to link CAMPFIRE globally with affiliated interests in such subject areas as CBNRM, responsible ecotourism, indigenous rights groups, and other topics. ART should assist the CA in creating and maintaining an Internet-based discussion forum where substantive and controversial issues can be debated and constructive suggestions from all quarters incorporated in the CAMPFIRE process. In this way, individuals and organizations, including animal welfare interests, could offer alternative perspectives on such questions as problem animal management, wildlife population dynamics, sustainable finance, resource tenure, wildlife habitat and monitoring, PRA, and other topics that could help guide CAMPFIRE's adaptive management model.

Evaluation Issue: USAID/Zimbabwe Response to CAMPFIRE International Advocacy. *"What steps have the Mission and its partners taken to address expressed concerns regarding use of U.S. funds for such activities; are these measures justified and appropriate in this instance? What if any additional measures might be taken to ensure that these concerns are handled in an appropriate manner?" (SOW C.4.b)*

Findings

Both Houses of the US Congress debated CAMPFIRE in committee. The Senate Committee emphasized "its support for programs that protect endangered species and promote sustainable development. CAMPFIRE has done its best to satisfy these two goals. The committee urges AID [sic] in the strongest possible manner to continue to insure the program's compliance with the Convention on International Trade in Endangered Species (CITES)." The Senate Conference Agreement "prohibits funds from being made available for any activity in contravention to [CITES]."

The evaluation team reviewed the extensive debate in the House of Representatives (Congressional Record - House, September 3, 1997) and found a diversity of opinion, but weighted in favor of very strong support to the CAMPFIRE and the principles it represents. In defeating the Fox-Miller amendment (HR 2159), the full US House of Representatives voted 267 to 159 for continued funding for CAMPFIRE through the NRMP II.

Despite this public scrutiny, the US Congress requested additional information regarding the Programme, much of which can be gleaned from this programmatic evaluation. Specifically, the Senate Committee chaired by Senator Barbara Boxer (D-CA) wanted documentation of the specific activities funded under CAMPFIRE.

The evaluation team found no evidence that NRMP II funds directly financed trophy hunting of elephants or other endangered species as defined by CITES. Actions such as the construction of wildlife fences, the establishment of water points, and the improvement of quota-setting procedures recognize a sport hunting industry, but their intent is to promote improved resource conservation and human well-being and, in the case of some fences, safety. The team found no evidence that NRMP II funds had been used to lobby US government officials and that the actions undertaken by ART and CA in the United States were of an information and advocacy nature. ART did begin lobbying the US

Congress during the CITES and CAMPFIRE debates, but a review of these activities by the Counsel General found that they had not been funded by USAID. The evaluation team made no attempt to investigate this matter further.

The evaluation team found that NRMP II had supported ART's information and advocacy campaign, which attempted to influence international agreements such as CITES and the Convention on Biological Diversity (CBD). The evaluation team believes that, from the Zimbabwean perspective, these are valid and possibly essential dimensions of CAMPFIRE, at least in those Rural Districts where sport hunting makes important economic contributions. As a sovereign state, Zimbabwe remains committed to promoting sustainable use, resumption of legal trade in ivory, and modifications to international conventions and treaties.

The evaluation team also found that, given the confusion of the debate over lobbying and the uncertainty with respect to US commitment to this aspect of the CAMPFIRE Programme, USAID has stopped providing support to ART. USAID's concern is over the appropriateness of its project-funded activities, and not the appropriateness of such activities to Zimbabwe's CAMPFIRE Programme. The evaluation team found that USAID/Z had implemented these changes primarily through a modification of its agreement with ZimTrust (Modification No. 05, Grant No. 690-0251-4-00-9001-00), with which ART had subcontracted. This modification contained special provisions that:

- Confirmed that funding for the Washington office would not resume (effective November 1996);
- Stopped funding for all foreign offices of the ZimTrust as of June 1997;
- Stopped funding for communication "with convention delegates, governments, and other official participants, or communication with the general public or segments of the general public, as part of a lobbying campaign to directly influence any official decision to down list elephants under CITES or to amend the Articles of CITES or other international convention; and communications with government officials, or communications with the general public or segments of the general public, as part of a lobbying campaign to directly influence the introduction, enactment, or modification of the legislation of any country."
- Fully phased out the subcontractor, ART, not later than December 31, 1997.

These steps were taken following scrutiny of ART's activities and considering the controversial nature of its positions with respect to those of the animal rights constituency in the United States, some members of the US Congress, and others.

The IUCN-led initiative to broaden the debate on sustainable use at the CBD is far more compatible with CAMPFIRE than is most of the current CITES agenda, in that it is already oriented toward sustainable use.

Conclusions

Suspending support to ART has been a necessary political step to protect the funding of the project. The team found this measure to be prudent under the circumstances, but one that is at odds with its more fundamental conclusions concerning the appropriateness of international advocacy activities in USAID-funded programs. In a global society and global marketplace, international advocacy is a legitimate activity and essential to meeting the sustainable development objectives outlined in USAID's current strategy (USAID 1997).

It is in the interest of CAMPFIRE to follow the efforts of IUCN's Southern Africa Sustainable Use Group to promote the integration of CITES into the broader CBD. Proponents of this initiative argue that the CBD and its Agenda 21 can appropriately absorb the CITES functions, noting the bulk of CITES work on Appendix III species is already centered on sustainable use, not the strict protectionist measures under Appendix I.

Recommendations

USAID should continue to take all legal steps necessary to protect the funding of NRMP II.

The CCG should hold a policy forum to discuss the overlap between CBD and CITES and the possible value of a strategy of international involvement in the issue.

D. Adaptive Management

Adaptive management might be described as a type of NRM that implies making decisions as part of an ongoing process. It assumes that monitoring the results of actions will provide a flow of information that may indicate the need to change a course of action. Changes in the parameters in which a program operates may also dictate the need for revision.

Scientific findings and the needs of society, for example, may signal a need to adapt resource management to new information. Thus, adaptive management, a form of "learning by doing," means steadily adjusting management in the light of experience in order to rebuild healthy ecosystems. Assessment and monitoring are integral to adaptive management.

Monitoring is repeated measurement to detect change over time; it provides feedback on the impacts of land management and can guide future improvements. The use of target organisms as indicators is increasingly accepted by managers. Adaptive management helps resource managers evaluate their own performance. It provides a way for the knowledge of managers to be applied in concert with that of scientists. It also helps the public see how successful management can be.

In communal areas, concerns relating to the human environment are central and require at least the adaptive monitoring that is called for as regards habitat and fauna. The task is by definition spatially bound. In some places, Adaptive Management Areas have been adopted. These are landscape units

designated to encourage the development and testing of technical and social approaches to achieving desired ecological, economic, and other social objectives. Each area is meant to pilot adaptive management, thus promoting learning about how to manage in a changing environment.

Management strategies based on untested scientific assumptions can create problems when agencies and the public demand action based on a poor understanding of cause and effect. (Arcese and Sinclair 1997) The application of management actions that have not yet been subjected to rigorous assessment may lead to the adoption of faulty strategies. In the absence of controlled experimental conditions, which is often the case under actual field situations, the success or failure of a particular strategy may not even be attributable to the actions themselves because of the number of confounding variables that contribute to the observed outcome. In an approach that is gaining increased acceptance, wildlife management is treated as an adaptive learning process (Walters 1986). One approach to adaptive management combines the monitoring of interventions with paired ecological variables in adjacent control areas (Arcese and Sinclair 1997). The occurrence near some CAMPFIRE areas of protected areas containing similar habitat and wildlife communities offers the opportunity to design experiments that can use the protected or minimally managed areas as controls for areas receiving CAMPFIRE interventions. This design squarely depends on adequate monitoring of "ecological baselines," and it has the potential to provide sound information to the adaptive wildlife management approach. Without suitable controls, there is no reliable basis for judging the success of interventions with regard to wildlife communities and ecosystems (Arcese and Sinclair 1997).

Evaluation Issue: Performance of the University of Zimbabwe's Center for Applied Social Sciences

Findings

CASS has been involved in the CAMPFIRE movement since 1989. Former Director Murphree was a key contributor to the fundamental thinking behind what later became CAMPFIRE. CASS continues to be a member of the CCG.

CASS stated its mission in 1994: "To serve as a multi-disciplinary applied social sciences department, providing high level graduate and policy relevant teaching and research."

CASS core staff positions include one professorship, four lectureships, and one research fellowship. It also has five research fellowships funded by the NRMP II.

CASS's NRMP II budget is Z$10,316,240 (through August 1999). CASS had spent Z$3,892,986 (38%) through January 1998. The trend in underspending its budget appears to be reversing; recent CASS involvement has seen an acceleration in spending rates. The spending rate is likely to increase because CASS has initiated an effort to contract out a larger portion of the work specified under its CCG obligation. Informal budget projections at a recent PET quarterly review meeting suggest that all grant funds will be exhausted at term.

CASS has suffered the loss of two key staff, has three vacant lectureships, and an unfilled research position. It is having a difficult time filling these positions and it is understaffed and unable to meet its NRMP II obligations fully and credibly. Staff feel that the university has not been supportive in filling these positions. While these are risks to continuity in CAMPFIRE participation, the Center is continuing to push to fill two lectureships, one professorship, and two research fellowships to resolve this problem. It will try to make employment more attractive by facilitating additional salary and fees by soliciting consultancies through the administratively more autonomous CASS Trust.

CASS is undergoing a period of self-analysis, trying to determine what its mission and focus should be. Some staff prefer a more traditional academic department role, with the emphasis on teaching and scholarly, publishable research and policy analysis, and strongly oppose the "social technicians" epithet that goes with an *applied* research focus. They feel that CASS should do analytic work. The current director is actively attempting to create an administrative middle ground that would allow CASS to fulfill both its analytic role and its obligation to provide "advisory services" to CAMPFIRE. As mentioned, CASS would contract out and oversee the advisory work (socioeconomic feasibility studies for CDF grants, CDF evaluations, various surveys, and, more recently, the CAMPFIRE customer service plan). CASS management believes that too much staff time gets lost in such routine work, but feels its expertise would make management oversight, quality control, and administration appropriate. CASS researchers would then be free to provide leadership in pursuing research themes that would be of value to CAMPFIRE's adaptive management mode of implementation. Key staff would be able to manage long-term ongoing studies in areas of critical importance to CAMPFIRE (woodland management, resource tenure security, and related policy, for example). The principal researcher would have prime responsibility for directing these research programs and would take advantage of timely opportunities of substance and staff availability. CASS would also continue to undertake short-term analyses on substantive issues and policy.

CASS has been doing research on CAMPFIRE for 10 years and has published 4 doctoral theses (one later turned into a book) and 2 masters theses. It has published an impressive list of policy analysis papers and the Technical Papers Series, as well as a limited number of refereed journal articles.

CASS' NRMP II activities fall into five areas: policy research; CAMPFIRE-related research (e.g., land use management); survey training for districts (a suspended activity); advisory services (on demand, with a very limited capacity); and NRMP II project management.

CASS has not made its findings widely accessible. It has been criticized for failing to write and distribute its reports to catch the attention of policy-makers and for its failure to be at fora for key policy-makers. CASS does not follow up to verify if fellows' research papers have an impact; fellows are interested in publishing articles to advance their academic careers. Other CCG members are among the critics. CASS appears to be launching a new initiative that responds to these criticisms. Working with other CCG members, some CASS studies were shortened and widely distributed and even made available on the Internet. The team briefly reviewed what might be called a dissemination plan. This step is important because the opinions expressed by the CA representatives question the relevance of CASS's work, citing it as abstract and not useful.

Conclusions

CASS has been responsible for supporting NRMP II and CAMPFIRE with a tremendous amount of applied field research. It has documented this work and given it wide distribution among partner institutions. It deserves much credit for the success of CAMPFIRE within Zimbabwe.

CASS has a track record of doing serious and useful policy analysis in support of CAMPFIRE.

CASS needs to bolster its staff if it is once again to play an effective role in CAMPFIRE.

Institutionally, CASS is passing through a period of low morale, but would like to enter more into policy areas of study, and to do less in the applied, field-oriented advising it has been asked to do in the past (a reflection of current personnel skills and interests).

CASS, as a university-based program, continues to be an important (potential) partner to the program, and ways to support personnel should be found.

Recommendations

CASS should continue to play an active role in CAMPFIRE in the areas of policy analysis and applied research. It should be encouraged to develop its policy dialogue skills so its analysis may better contribute to policy decision-making. Specifically, CASS should: (1) write policy briefs that summarize major findings and recommendations; (2) seek to expand the form in which studies are presented so that they are accessible to sub-national audiences, e.g., it might work with Action magazine to put some policy-related studies in an animated strip format in the magazine and other educational materials; and (3) seize opportunities to make its work known through popular media, public speeches, and participation in CAMPFIRE meetings, workshops, and training.

CASS must be tasked with a studies mandate that allows it to determine timing and the precise content of studies internally. The CCG should help define the subject areas and scope of inquiry, such as tenure policy, eco-tourism, impact of natural resource policies, or other areas determined.

USAID, through the IC grant or through the CDF, should strengthen CASS's efforts by:

- Providing block grants to principal investigators in the key subject areas identified in this report (policy harmonization and local resource governance, woodland policy management and tenure, and the nature of community commitment to CAMPFIRE); and

- Revising CASS agreement.

V. LOOKING AHEAD: STRATEGIC PLANNING AND CAMPFIRE SUSTAINABILITY

A. Graduation Scenarios

Current CAMPFIRE NRMP II support is scheduled to end in September 2000. The Mission has requested an extension through FY2002, which would move the project completion date to September 2003. The evaluation team considered several broad options to guide Mission support for CAMPFIRE under each timeframe. The team's reflections are summarized in the scenarios presented below.

The evaluation team favors the longer term phaseout of USAID support, as proposed in the FY2002-A scenario. As is argued in the body of the report, it contains the most progressive and responsive means of achieving results *and* closing down support. More specifically, it will:

- Enable a consolidation of progress in institutionalizing the CAMPFIRE principles;
- Establish momentum for the push for CAMPFIRE diversification into a wider range of resource use and revenue sources; and
- Help establish a favorable policy environment and other enabling conditions for long-term program sustainability.

The team recognizes that there are other ways to pursue the above objectives, and the range of options encourages broad CCG and BRC debate over program modifications for the remaining CAMPFIRE support under NRMP II.

1. Scenarios Assuming Graduation in FY2000

Scenario FY 2000-A: Closeout with Modifications to the Existing Implementation Framework

Under this scenario, USAID would support existing grants under the IC through their current August 1999 termination dates, after which they would receive a one-year extension at 50% funding levels. They would be encouraged to complement NRMP II grant funds with other funding to complete their CCG commitments. Support for new NRMP II partners and a renewed grant to the ZimTrust would be structured similarly. Support for government partners would be drawn directly from the USAID budget as per approved activity proposals. USAID, in collaboration with the BRC, would eliminate the PET. This action is a step toward Mission graduation and recognizes the CA's enhanced capacity. Both the reduction in direct core support to grantees and the elimination of the PET represent a gradual and phased withdrawal of NRMP structures from within the CCG. The level of the NGO match could be adjusted by institution if circumstances warranted. USAID and the BRC would work through the IC to transform the CDF into an autonomous "sinking" grant fund that would gradually disperse funds through and beyond the PACD. When the monies have expired, the funding mechanism would cease to exist. The fund would support continued CAMPFIRE activities by the CA

membership, the CCG, and other actors whose proposals meet the revised CDF criteria. Other USAID operating units could consider supportive, complementary intervention during and after the bilateral program's phaseout. The CDF and possible presence of Peace Corps staff on the ground could leverage ongoing progress to enhance long-term sustainability.

Scenario FY2000-B: Closeout with No Major Modification to the Existing Implementation Framework

Under this scenario, NRMP II would continue to fund existing CCG members and functions and operate under the same structures as are currently in place, i.e., the PET and CDF. New members would receive funding to enable diversification, habitat monitoring, further devolution, and bottom-up planning, which would be given additional impetus to achieve the greatest immediate results. At the PACD, USAID would pull out with minimal allowance for continuity and sustainability built into the NRMP II. The RCSA and other USAID operating units might play a greatly reduced role in CAMPFIRE's future, especially if a small grant fund(s) from other sources and/or Peace Corps staff can support field-based initiatives.

2. Scenarios Assuming Graduation in FY2002

Scenario FY2002-A: Extension Through FY2002 with Transition to CDF Funding

This scenario would essentially constitute an extension and expansion of Scenario FY2000-A. The additional time would allow CAMPFIRE to consolidate the considerable investment made under the NRMP II and achieve significantly greater results in several areas. Under the extension, similar provision would be made for the PET, CDF, and new and existing CCG partners as were made under Scenario FY2000-A . Direct grants under the IC would wind down on the same time schedule, but the additional funds would allow a much greater period of CDF funding support. The IC could be extended to oversee a two-year transition to the autonomous CDF in the post-Mission closeout period. Between 2000-2002, the fund might contain a set-aside to enable smooth termination of certain core functions carried out by the CCG partners and afford them time to develop alternative funding sources for some activities. The additional time would also make implementation of CDF infrastructure grants a more realistic activity. It would allow USAID to assist CAMPFIRE in pursuing its policy initiative to ensure producer communities are left with greater security in resource access and tenure. The additional effort would be expected to advance the diversification thrust significantly, especially of CAMPFIRE ecotourism ventures. As new partners are brought in, the extension would establish the basis for a more integrated approach to NRM. Such a "CAMPFIRE approach" would use participatory land-use planning and lead to "graduated" communities capable of and motivated to manage their resources sustainably. The extension would allow USAID to strengthen program synergy with the Mission's special objective in economic growth and democracy. As with the other scenarios, other USAID operating units could consider supportive, complementary intervention during and after the bilateral program's phaseout. The CDF and possible presence of Peace Corps staff on the ground could leverage ongoing progress.

Scenario FY2002-B: Extension Through FY2002 Under the Existing System of Sub-grants

This scenario is essentially an extension of Scenario FY2000-B. Existing project structures would be maintained. Additional funds would permit efforts to diversify CAMPFIRE NRM activities, especially into ecotourism and woodland management. Policy change and policy initiatives could be made a greater priority. The NRMP II could be used to enhance the GOZ/CAMPFIRE aim of comprehensive habitat monitoring to complement the widely praised wildlife monitoring functions. The greatest number of the incremental recommendations made in this report could be implemented under this scenario. The PET could be phased out prior to the PACD but less abruptly than under the FY2000 scenarios. With careful planning, the impact of the NRMP II closeout could be reduced.

Scenario FY2002-C: Extension with No Additional Funding

This scenario is a second-choice one but is still preferable to the presently approved FY2000 closeout. Activities and budgets could be wound down more slowly. There would be no impetus to spend funds rapidly. Rather, the challenge would be to use them even more parsimoniously than at present. Results would suffer, however. Diversification to other CBNRM regimes that employ participatory methodologies, land-use plans, and the same start-up incentives and post-project activities with new CCG partners would be limited to options outside the control of NRMP II in the post-graduation context. Activities would be triaged, and some activities would be curtailed or dropped.

B. Sustainability of CAMPFIRE

1. Extending and Improving the CAMPFIRE Development Fund

Given the start-up delays with the NRMP II and additional distractions brought on by the international CITES debate, progress on NRMP II-funded activities has understandably been slower than expected. Design flaws, which could be easily remedied, in the CDF compounded this slowness. The CCG group, which has spent years -- with USAID encouragement -- building capacity to implement sustainable use principles, merits continued support.

Bringing in three new CCG members and extending the project by a year will also draw down funds. The exact amount remains to be seen. However, the absorptive capacity of SAFIRE, the DNR, and the FC is limited. In addition, it is unlikely that "pushing" funds through the CDF at an excessive rate will result in institution-building or successful in CBNRM activities in the field.

For these reasons, this section concentrates on exploring the option of capitalizing the remaining available program funds. Capitalization would have the advantage of slowing the rate of spending to one that could be matched with local absorptive capacity. High quality field results even without large supportive project structures would continue to be possible.

The purpose of capitalization would be to establish a sustainable financing mechanism that continues to provide small-scale support for activities that are consistent with NRMP II goals and the

underlying principles of CAMPFIRE. The IC could easily establish this mechanism during the closeout period.

Capitalization could involve either an endowment or a sinking fund. In either case, prudent management would require that the capital stay off-shore in the United States. Management of the grant fund would be in Zimbabwe. That is, only fiduciary custodianship of the capital would be entrusted to an offshore account. Transfers for grant-making would be made annually to a local organization charged with participating in the development, approval, and monitoring of the grants.

The choice of a sinking fund or straight endowment concept depends on the amount of capital available. Because of management costs, it rarely makes sense to create an endowment for a developing country unless the available capital is greater than about US$7 million.[3] When the amount is less that $7 million, the best alternative is a sinking fund. A sinking fund works somewhat like an endowment: the funds are invested in the US, usually in some professionally advised fund that combines stocks, Treasury bills, and cash. If the trust that holds the money is registered as a 501c.3 charitable organization in the United States, competitive and prudent management is available from such services as The Investment Fund for Foundations (TIFF) or Vanguard Institutional Advisory Services. WWF-US has had fair experience and success serving as a trustee for beneficiaries outside the United States, often with USAID funding as the original source of the capital.

The difference between an endowment and a sinking fund is that, with a sinking fund, the capital is not accumulated and does not grow over time. Rather, a fixed sum is transferred each year to a grant-maker who is charged with making grants consistent with the purposes of the fund as specified by the original donor, in this case, USAID. (A suggested approach to establishing and managing a longer term fund mechanism is included in Appendix G.) Finally, it is worth noting that, were substantial funds available in excess of $US7 million, and the endowment mechanism favored, the level of annual grant-making would be much lower at first (see the accompanying table) than with a sinking fund. However, the level would grow over time and provide a longer lasting USAID legacy in Zimbabwe.

Recommendations

The team recommends that USAID establish an extended funding mechanism. Several planning steps would be necessary:

Work with existing CCG members to make expenditures under the current framework;

Enter into a dialogue with Washington-based USAID legal counsel on possible trust and endowment scenarios; and

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A common rule of thumb puts that figure at US$10 million, but that is for a US context. When the intent is to create a steady source of small-grant funds in a developing country, US$7 million will generate the sums required.

Contract for an in-depth review of the capitalization concept to investigate the possibility in depth, explore the wording of a trust agreement, and review potential partners and options for a local grant-making intermediary that would work in-country after USAID departure until the grant funds were spent.

C. Strategic Plan Review -- USAID Results Framework

Evaluation Issue: SO1 Performance Monitoring Plan *"To what extent these SO-level indicators and targets are appropriate, i.e., can they be appropriately measured and monitored for SO 1 performance purposes ?" "Are they realistic for the specified time frames and resource levels?" "What changes might the team recommend in these indicators and targets for improved measurement and monitoring of SO achievement and sustainability?" (4.D.e)*

Findings

In June 1995, USAID/Z developed a Plan of Operations for Phase II that included objectively verifiable, quantifiable indicators, including targets and timeframes, to measure project outputs. Under Phase II of the project, each of the implementing partners (e.g., the ZimTrust, WWF, CASS, ACTION, ART, PET, and The DNPWLM) is responsible for one of the eight planned outputs that will be measured to determine the achievement of project purposes (Audit, 1995).

The 1995 audit reported that USAID/Z needs better indicators for measuring results (Audit, 1995), and the Mission progressively worked on its indicator set. IUCN-ROSA facilitated the SO redesign effort, leading to the current set of indicators and performance monitoring and measurement tables and data collection plan. "Virtual SO team members" in USAID/W/AFR /SD/PSGE also provided assistance. The Mission relies on CCG partners, which generate a more extensive information base for their own and the Programme's M&E needs. The SO1 indicators attempt to isolate critical measures that meet the needs of the USAID Mission and overall Agency requirements for strategic performance monitoring and measurement. Over the course of the project, changes at all levels (shift from a food security to NRM objective, reengineering and redesign of NRMP II as SO1, shift from household to community focus, etc.) have affected what should or even could be measured by the CCG (i.e., addition of new partners and enhanced capacity of existing partners, etc). The existing framework reflects this evolving context and the capacities of the CCG partners systems.

USAID and its implementing partners spent a great deal of time and effort discussing, developing, and then implementing the current Performance Monitoring Plan for SO1. The reasoning and causal linkages established between "performance-based, process indicators," which are "to measure results rather than outputs" at various levels, is theoretically sound. It is, nonetheless, removed from on-the-ground complexity and "real-life" ability to measure. CAMPFIRE, a complex program, is process-orientated, and the indicators developed may be difficult to measure objectively. An example is the ambiguity as to what constitutes a community. In the R4, a "CAMPFIRE community" is defined to include people at the village, ward, *and district* levels. CAMPFIRE implementation and principles are, however, based on benefits to "producer communities" -- households at the village level.

The current SO1 Results Indicators are displayed in Appendix L, along with planned and actual results. The table also offers the rapid, overview assessment of the indicators made by the responsible evaluation team members. Six of the indicators from the USAID March 1998 R4 submission draw information from USAID pre-NRMP 1989 baseline information. That baseline refers to two districts (Guruve and Nyaminyami), comprising 15 wards. USAID/Z and WWF data for that year differed substantially, but the differences were corrected in the most recent R4 submission prepared during the evaluation team's fieldwork.

USAID outsourcing of the NRMP II for M&E information to multiple CCG partners is not working well in terms of producing a coordinated, focused activity. The issue is not that the framework for meetings and coordination -- the PET M&E subcommittee -- is not working. The subcommittee does seem to be progressing, although the team's observations in three field visits (regional implementation meetings) indicate that the ground-level generation of information is felt to be complex, not always harmonious, excessive, and incompletely understood, internalized, and coordinated. Rather, the NRMP II needs to add a set of analytical concerns to the already substantial monitoring efforts underway, even though the CA has whole-heartedly endorsed USAID's customer service plan and borrowed the concept and tools for its own purposes. More importantly, some participants recognize that much of the progress of CAMPFIRE eludes the formal M&E system and may be accessible only by less quantitative, and at times more subjective, measures.

The POMS instrument to measure results (IR 2.0) has been tested in a few Rural Districts; the reliability and validity of this very long and complex instrument remain unknown. Three of the 10 indicators in the table are "proposed" and have not been approved for actual use. One of the remaining seven indicators will be discontinued after 1998. Thus, six indicators are actually producing usable results at this time.

Despite the concerns expressed above, the evaluation team recognizes that CAMPFIRE is fortunate in having an extremely rich base of data from the early years of the Programme to draw upon -- particularly as concerns wildlife monitoring and dividends earned and distributed among local communities. This rich data base, developed within CAMPFIRE through the efforts of its various implementing partners, serves many purposes. The Programme in Zimbabwe has generated one of the most impressive sets of relevant and high quality literature found in any program of its kind in the world, much of it with direct support from NRMP II (e.g., CASS, WWF, and ART/ACTION bibliographies).

Many sources have benefitted the CAMPFIRE very substantially, but they are not being measured at all. An example is the employment benefits to rural communities from wildlife tourism industries located nearby or in their midst. Even measuring the economic benefits of natural resource diversification efforts (e.g., Mopane worms, elephant dung paper, and leather crafts) is extremely difficult and time-consuming, and it is even more arduous to centralize the information at a national level in a meaningful and timely manner so that it can be included in a quarterly, or even annual, S01-reporting exercise.

Attention to spatial aspects in CAMPFIRE's M&E system is limited. Monitoring of habitat loss, particularly in the wildlife-rich Rural Districts and wards, is very weak. This gap is particularly surprising given the financial resources at the disposal of CAMPFIRE over the past eight years. Without an objective basis for characterizing, describing, and quantifying the increasing fragmentation of habitat and the growth of scattered population centers within former wildlife habitats, it is difficult to interpret and respond to this important demographic challenge to CAMPFIRE. Simply monitoring population growth, without knowing where people are settling, does not address the problem adequately.

Conclusions

Performance monitoring and evaluation have been weak components of the NRMP I and II, for reasons that are usually beyond the means of project personnel to improve significantly. No one wants the cost of monitoring to exceed the costs of the activity being monitored. It already takes a great deal of project personnel's time, and it should not be increased. Simplification would be preferable.

Performance monitoring and evaluation in NRMP II could have been better coordinated with the CA as the lead agency. There has been inadequate focus on the verification of results in attempting to implement CAMPFIRE principles. Since the SO1 was redesigned, there is a closer association between what is proposed for measurement and what is being carried out on the ground.

NRMP II performance "process" monitoring may not have exploited the rich database resources to the extent possible, preferring simply to create a new set of indicators, many of which would appear difficult to acquire or interpret.

A fresh look at existing data might be considered. For example, the benefits of CAMPFIRE dividends in real terms, when compared with inflation, might be pointed out more clearly. While the value in Zimbabwe dollars of a cow or kilogram of corn to rural farmers has declined over the years, the value of the hard currency they get from wildlife management, as well as other NRM options (exported honey and tourism), has remained constant, if not increased. The Zimbabwean dollar has lost 50% of its value since the beginning of the NRMP II, but the hard currency values of natural resource products have remained the same or risen.

The case for rural communities *without* wildlife dividend benefits is not clearly shown. One way to catch diversification in revenue generation (SO1E), a key goal for the NRMP II, particularly in these closing years of USAID support to the Programme, would be to take total non-sport hunting income as a percentage of total CAMPFIRE NRM revenue (that figure could include income-producing activities flowing from the initial wildlife revenue, as in case of the revenue from grinding mills or leather crafts) (see Tables 6 and 7). Yet, obtaining and aggregating the data needed for this proposed indicator will be extremely difficult. CAMPFIRE benefits to rural communities are very substantial, and their impact is not captured through the indicators presented.

Policy changes are an important intermediate result and seem to escape the current framework. The use of NRM by-law infractions is a particularly disturbing proxy. Most by-laws the team examined were local adaptations of prescriptive, restrictive, top-down, and agriculturally-biased model by-laws that do not reflect the participatory resource use governance and self-regulation that seem indicated by CAMPFIRE's principles.

During the remaining years of NRMP II, improvements in habitat monitoring need to be made. Baseline information for *at least* the wildlife-rich Rural Districts and wards would be an important database to leave to future CAMPFIRE initiatives within Zimbabwe. Case study data exist that would provide a longitudinal ground check for a general system that encompassed all CAMPFIRE areas.

Recommendations

Given the remaining timeframe of NRMP II, and the proposed phased closedown, no significant additional time should be expended on further modifying or changing the current monitoring system. Better interpretation and use of existing data and ongoing data acquisition should meet the needs of the project.

USAID/Z, with assistance from its IC, should assume direct responsibility for insuring the coordination of the data-gathering efforts that deal directly with completion of USAID's SO1 Performance Monitoring Plan. The point is not for USAID and the IC to gather these data directly, although periodic field verification of aggregate data will assist in guiding CAMPFIRE support, in understanding the strengths and weaknesses of the data acquired, and in gathering first-hand anecdotal material with which to complement the performance monitoring tables. It is currently clear which institutions are responsible for gathering the requisite data needed to report on each indicator, and this arrangement should continue.

The M&E subcommittee should establish indicators for the resources into which CAMPFIRE is diversifying. Tourism statistics might be an important indicator to follow, as a significant number of the tourists who visit Zimbabwe visit one or more of its game parks. Concrete examples from two or three specific photo-safari sites (e.g., Sun Hotel at Bumi Hills) of the numbers of tourists coming might be included with the aggregate figures. All such visits add revenue that benefits the rural communities living directly with wildlife and can be seen as a proxy to show whether the benefits are increasing or decreasing over time. Moreover, this step would allow USAID to monitor at least one of the project's critical assumptions.

USAID/Z should obtain some comparative data from either the pre-NRMP period (i.e., baseline) or Rural Districts not participating or just entering into NRMP II as a basis for assessing results.

The ZimTrust should continue to implement POMS. While it may be a complex and still largely untested tool for measuring impact, it is being used and should continue to provide the best information it can in the time remaining to this project. Perhaps it can be adapted as a criterion for defining "graduated CAMPFIRE assumptions."

The formal indicator reporting needs to be supplemented with case study material. This approach is already being applied but can be taken a step further by reinterpretation and "ground truthing" of the in-depth studies by CASS and other CCG members. This information could contribute to the "adaptive management model" that CAMPFIRE employs.

The source and data quality analysis that accompanies SO indicator measurement should be improved. USAID/Z should also improve the justification for each of its project result indicators.

There need to be several sets of spatial habitat monitoring data. Efforts should be initiated to improve the monitoring of habitat loss, beginning with the most important wildlife Rural Districts. A baseline for key aggregate land-use classes (e.g., bush cover, new agricultural land, old agricultural land, human settlements, roads, and bodies of water) could be established for approximately the last 10 years, using Landsat images for the 1970s, for example. A second set could be established for the period 1988-1991, when CAMPFIRE began. Finally, a third period, the most recent coverage possible -- 1997/1998 -- should be completed. Annual, low-cost, videographic monitoring could be initiated in high-risk but valuable areas, and the data superimposed on the earlier geographically referenced maps. Finally, these spatial data could be integrated with information concerning safari zones of operation and correlated with wildlife quotas and revenues being generated. It seems the WWF is currently the best positioned to support such an effort. The additional cost of this effort would certainly be justified, given the current total absence of such information for Zimbabwe's most significant natural resource: its wildlife. Such information is also critical to establishing meaningful NRM plans for the concerned wards and Rural Districts. Given sufficient time and funding, these efforts should be extended to other Rural Districts where forests (without wildlife) are the resources, as they are critically important to the future economic options of the local population. Had such spatial monitoring resources been available for at least CAMPFIRE's wildlife-rich Rural Districts, NRMP II could have objectively measured reduced habitat loss as an indicator of the success of the Programme and of CAMPFIRE's overall philosophy.

Table 12: Model 1: Capitalization of Fund in Endowment Mechanism/Trust Fund

Assumes Off-Shore investment of capital in U.S. financial markets,
stock/bond mix generating 7% long-run average total return (conservative), and
requirement to deduct 1% management costs and 3% inflation reinvestment.

Basic Capital	US $	Yr 1	Yr 2	Yr 3	Yr 4	Yr 5	Yr 6	Yr 7	Yr8	Yr 9	Yr 10
Total Initial Endowment	7,000,000	7,415,100	7,696,132	7,987,816	8,290,554	8,604,766	8,930,887	9,269,367	9,620,676	9,985,300	10,363,743
Less 1% Management Fee	70,000	74,151	76,961	79,878	82,906	86,048	89,309	92,694	96,207	99,853	103,637
Less 3% for Grant-making	6,930,000	7,192,647	7,465,248	7,748,181	8,041,837	8,346,623	8,662,960	8,991,286	9,332,056	9,685,741	10,052,830
Available for Grants after 15% grant-makers overhead		189,085	196,251	203,689	211,409	219,422	227,738	236,369	245,327	254,625	264,275

Table 13: Model 2: Eleven Year Sinking Fund

Same assumptions as above, but aim for $500,000 fixed payout every year

Basic Capital	Zim $	Xchange	US $	Yr 1	Yr 2	Yr 3	Yr 4	Yr 5	Yr 6	Yr 7	Yr8	Yr 9	Yr 10	Yr 11
Unspent CDF	25,000,000	15	1,666,667											
Unspent Project Funds			2,500,000											
Additional Donor Contributions						REINVESTMENTS								
Total			4,166,667	4,383,433	4,075,932	3,743,899	3,385,502	2,998,778	2,581,622	2,131,775	1,646,817	1,124,153	561,001	-45,621
1% Management Fee			70,000	74,151	76,961	79,878	82,906	86,048	89,309	92,694	96,207	99,853	103,637	0
Less Grant Budget			4,096,667	3,809,282	3,498,971	3,164,021	2,802,596	2,412,731	1,992,313	1,539,081	1,050,610	524,300	-42,637	-545,621
Available for Grants after 15% grant-makers overhead				425,000	425,000	425,000	425,000	425,000	425,000	425,000	425,000	425,000	425,000	425,000
Fund Disappears after 11 years														

Management fee is the cost of an investment firm plus marginal cost of trustees meeting and bank transfers.

Table 14: FY 2000-A Graduation Scenario

Recipient	Remaining Total	Amount Projected to FY 2000 @ 100%	Annual Rate	March 1 - Sept 30, 1998	100% for FY 1999	50% for FY 2000	Total Budget	Balance to New Partners or CDF
CDF	5,363,370		425,000	400,000	425,000	425,000	1,250,000	4,113,370
DA/PW	1,638,636	2,035,446	814,178	407,089	814,178	814,178	2,035,445	-396,809
DNPWLM	1,439,236		100,000	50,000	100,000	50,000	200,000	1,239,236
MLGRUD	200,000		100,000	50,000	100,000	50,000	200,000	0
CA	897,645	993,750	397,500	198,750	397,000	198,750	794,500	103,145
Zimtrust	664,651		600,000	300,000	600,000	300,000	1,200,000	-535,349
WWF	1,154,917	1,058,333	523,000	261,500	523,000	261,500	1,046,000	108,917
CASS	653,990	662,500	265,000	132,500	265,000	132,500	530,000	123,990
SAFIRE	0		200,000	100,000	150,000	100,000	350,000	-350,000
Forestry C.	0		200,000	100,000	150,000	100,000	350,000	-350,000
DNR	0		100,000	75,000	75,000	50,000	200,000	-200,000
USAID	23,959	250,000	250,000	125,000	250,000	250,000	625,000	-601,041
Totals	12,036,404	5000029	3974678	1,987,339	3849178	2731928	8,568,445	3,255,459

DA, USAID, and the CDF are not subject to % reductions.
CDF will begin FY2001 with about $3,255,459 (plus any amount unspent in previous years).
It is important that USAID allocate monies annually in US$ currency as required;
otherwise 20%+ inflation will change all projections and diminish significantly program impact.

FY2000 Graduation Scenario	
Current funds	12,036,404
Required to 9/30/2000	8,568,445
CDF Fund	3,255,459

Table 14a: Future Scenario 2002-A (original)

Recipient	Remaining Total	Amount Projected to FY 2000 @ 100%	Annual Rate	March 1 - Sept 30, 1998	75% for FY 1999	50% for FY 2000	Total Budget	Balance to New Partners or CDF	Amount Needed to September 2002	Balance After FY 2002
CDF	5,363,370		425,000	400,000	425,000	425,000	1,250,000	4,113,370	850,000	4,166,667
DA/PW	1,638,636	2,035,446	814,178	407,089	814,178	814,178	2,035,445	-396,809	1628356	0
DNPWLM	1,439,236		100,000	50,000	75,000	50,000	175,000	1,264,236		0
MLGRUD	200,000		100,000	50,000	75,000	50,000	175,000	25,000		0
CA	897,645	993,750	397,500	198,750	298,125	198,750	695,625	202,020	596250	0
Zimtrust	664,651		600,000	300,000	450,000	300,000	1,050,000	-385,349	0	0
WWF	1,154,917	1,058,333	523,000	261,500	392,250	261,500	915,250	239,667	0	0
CASS	653,990	662,500	265,000	132,500	198,750	132,500	463,750	190,240	0	0
SAFIRE	0		200,000	100,000	150,000	100,000	350,000	-350,000	0	0
Forestry C.	0		200,000	100,000	150,000	100,000	350,000	-350,000		0
DNR	0		100,000	75,000	75,000	50,000	200,000	-200,000		0
USAID	23,959	250,000	250,000	125,000	250,000	250,000	625,000	-601,041	850,000	0
Totals	12,036,404	5000029	3974678	1,987,339	3353303	2731928	8,072,570	3,751,334	3924606	0
									4,502,439	

DA, USAID, and the CDF are not subject to % reductions.
CDF will begin FY2002 with about $5,016,667 (plus any amount unspent in previous years).
It is important that USAID keep money allocated per year in US dollar currency until when needed; otherwise 20%+ inflation will change all projections and diminish significantly program impact.

NRMP Graduation Scenario:

CDF	5,016,667
DA/PW	1,628,356
CA	596250
USAID	850,000
Totals	8,091,273
Left	3,751,334
Need	4,339,939

Table 14b: Future Scenario 2002-A (modified)

Recipient	Remaining Total	Amount Projected to FY 2000 @ 100%	Annual Rate	March 1 - Sept 30, 1998	75% for FY 1999	50% for FY 2000	Total Budget	Balance to New Partners or CDF	Amount Needed to September 2002	Balance After FY 2002
CDF	5,363,370		425,000	400,000	425,000	425,000	1,250,000	4,113,370	850,000	4,166,667
DA/PW	1,638,636	2,035,446	814,178	407,089	814,178	814,178	2,035,445	-396,809	1628356	0
DNPWLM	1,439,236		100,000	50,000	75,000	50,000	175,000	1,264,236		0
MLGRUD	200,000		100,000	50,000	75,000	50,000	175,000	25,000		0
CA	897,645	993,750	397,500	198,750	298,125	198,750	695,625	202,020	596250	0
Zimtrust	664,651		600,000	300,000	450,000	300,000	1,050,000	-385,349	0	0
WWF	1,154,917	1,058,333	523,000	261,500	392,250	261,500	915,250	239,667	0	0
CASS	653,990	662,500	265,000	132,500	198,750	132,500	463,750	190,240	0	0
SAFIRE	0		200,000	100,000	150,000	100,000	350,000	-350,000	0	0
Forestry C.	0		200,000	100,000	150,000	100,000	350,000	-350,000		0
DNR	0		100,000	75,000	75,000	50,000	200,000	-200,000		0
USAID	23,959	250,000	250,000	125,000	250,000	250,000	625,000	-601,041	850,000	0
Totals	12,036,404	5000029	3974678	1,987,339	3353303	2731928	8,072,570	3,751,334	3924606	0
									4,502,439	

DA, USAID, and the CDF are not subject to % reductions.
CDF will begin FY2002 with about $5,016,667 (plus any amount unspent in previous years).
It is important that USAID keep money allocated per year in US dollar currency until when needed; otherwise 20%+ inflation will change all projections and diminish significantly program impact.

NRMP Graduation Scenario

CDF	5,016,667
DA/PW	1,628,356
CA	596250
USAID	850,000
Total	8,091,273
Left	3,751,334
Need	4,339,939

VI. NRMP II LESSONS LEARNED

A. Planning for Public Scrutiny

More than ever it is becoming important to screen and design development projects against a filter of potential debilitating controversy. Modern communications technology, including the Internet, mean that activist participation can be very focused and rapidly mobilized. Foreign assistance activities that operate in remote, as well as culturally and politically distinct, circumstances are particularly susceptible to US interest group pressures. CAMPFIRE's controversial acceptance of sport hunting of elephants as a means of furthering conservation-based community development proved to be a lightening rod for controversy. The impetus might just as easily come, however, from support for divisive health or population issues and practices, for out-of-favor crop or forestry activities, for financing for ever-unpopular massive infrastructure projects, or for decisions to operate in disputable geographic locations. "Hot" issues backed by a concerted campaign can have the immediate impact of halting (for better or worse) longstanding and ongoing development efforts. This civil society oversight can be healthy, but it should be considered at the planning stage. This is particularly important with overseas development activities, because domestic standards and international program standards of acceptability are not necessarily the same. Oftentimes the opposition is not domestic, not well-organized, and/or not popular with decisionmakers. CAMPFIRE has been able to survive, but the effort to ensure its survival may provide lessons for what may become a more characteristic level of public involvement in specific development assistance activities.

B. The Legitimacy of Non-Governmental Organizations

CAMPFIRE's experience reaffirms the validity and utility of involving NGOs as important actors in the development process. In the early 1980s, it was considered a major breakthrough to have NGO participation at an international meeting on NRM in the Sahel. The so-called "Bamako process" was launched under the umbrella of an intergovernmental advisory commission and has become something of a benchmark for NGO involvement toward institutionalizing local participation in NRM programs. The 1991 Rio "Earth Summit" was a landmark for establishing and formalizing an NGO place at international fora. CAMPFIRE, mainly through the CA and ART at the international level, and through all the CCG NGOs at the operational level, confirms the value and need for NGOs to carry forth mandates from a specific program level. The Programme further underscores the point that NGO legitimacy is not a given, but is based on specific comparative strengths in serving and responding to local people and their community-based organizations.

C. The Need for Strong Partnerships

One of CAMPFIRE's most impressive accomplishments is to demonstrate the value of strong partnerships. The extent and depth of local commitment and ownership of the Programme enable it to see beyond and overcome the many hurdles and institutional limitations that have thus far presented themselves. CAMPFIRE is a microcosm embodying the complex dynamics of ecology, politics, and race, of central control and decentralized autonomy, of state structures, NGOs, and

community-based organizations, and of local interests and international pressures. Despite broad commitment and field-based success stories, CAMPFIRE is not yet a mature program. The process of forming and constantly modifying partnership arrangements between government and NGOs, urban and rural institutions, communities and resource-based enterprises, and local and international groups has thus far given the Programme a strength and vitality that are instructive for similar programs anywhere.

D. The Importance of Cultural Values

The real heroes of CAMPFIRE are the indigenous peoples who have realigned their relationship to the wildlife and other resources that surround them. Giving these resources an economic value and establishing sufficient tenure and market security to generate income are the easy parts of the Programme. Sustaining their commitment, involvement, and profound change in the way populations relate to the environment is the greater challenge, and it is based on communities rediscovering wildlife as an asset to be protected and shared. Tenure and governance of natural resources, especially intermittent fugitive resources such as wildlife, will inevitably rely on institutions that are able to harness and be harnessed by local cultural traditions and values. CAMPFIRE works to create enabling conditions, but it is Zimbabwe's rural communities that have made CAMPFIRE work.

E. The Inadequacy of Protected Area Systems to Protect Biodiversity

Although it is much neater bureaucratically to assign the global role of conservation of biodiversity to a segregated and comparatively easily controlled system of protected areas, truly viable conservation must consider the entire range of habitats that occur across the landscape. Given the preponderance of human settlement, sustainable use approaches show real promise as a long-term conservation tools. National parks occupy about 7% of the country, yet intact relatively natural landscapes take up more than one-third of the national territory is managed for wildlife and other resources.

Trade restrictions are not always the best or most appropriate tools for conservation. Furthermore, they represent an imposition of CITES parties' methods over alternative options that may be favored by range states themselves. At least from an internal national standpoint, CITES restrictions had been largely inappropriate to conservation problems in Zimbabwe. Even the anti-CAMPFIRE interests advocate *limiting* or *reducing* elephant populations through birth control programs. In a context where current elephant populations may exceed carrying capacities by a factor of two, habitat loss and interconnection are much more important challenges. Sustainable use approaches are providing the essential mechanism to address these challenges, and this is why conservancies, CAMPFIRE areas, and private game ranches are finding their way into Zimbabwe's mosaic of land uses.

F. Balancing Results and Flexibility in Programming

Since conservation is an ongoing effort, it is not surprising that the technical division of USAID's Africa Bureau once used the somewhat tongue-in-cheek title of a CBNRM programming document,

"Where are we going and how will we know when we get there?" The lesson from CAMPFIRE is that application of adaptive management redefines the question as, "Where are we going, and how will we know when we are off track?"

A clear vision of where a program is heading is vital if the implementation approach permits substantial and frequent modifications. The force of vision projected in CAMPFIRE's strong and clearly stated principles has served as a backdrop and yardstick for the Programme's application of adaptive management practices. Protecting nature is not like constructing a building, and thus, as CAMPFIRE's experience shows, does not require a detailed blueprint. CAMPFIRE's conservation objectives are permanent, and meeting them is an ongoing effort. What is remarkable and instructive about the Programme are the importance and constancy of the underlying CAMPFIRE principles as guideposts in making constant programmatic adjustments.

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FINAL REPORT
Appendicies

Mid-Term Evaluation
of the
Zimbabwe Natural Resources Management Project, Phase II
(USAID/Zimbabwe Strategic Objective No. 1)

Contract #AEP-0085-I-00-6021-00

Communal Areas Management Programme
for Indigenous Resources, CAMPFIRE

Submitted to:
USAID/Zimbabwe

Submitted by:
The Mitchell Group, Inc.
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July 31, 1998

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APPENDIX A

LIST OF PERSONS CONTACTED

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GOVERMENT OF ZIMBABWE

Ministry of Mines, Environment and Tourism
Hon. Simon Moyo, Minister
Edward Chindori-Choninga, Deputy Minister
C. Chipato, Permanent Secretary

Ministry of Local Government and National Housing
W. Chiwewe, Permanent Secretary
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Tawona Tavengwa, Information Officer.
Jerry Gotora, Chairman UMP Zvataida RDC/Vice Chairman
Ngoni Wasarirevhu, Deputy Director(Finance and Administration)
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NRMPII Institutional Contractor (DA)
Ed Butler, Chief of Party.
Oliver Chapeyama, Program Manager
N. Wasarirevhu, Director (Financial and Administration)

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Dr. Russell Taylor, Program Manager
Dr. Ed Wilson, Director, Int'l
Charles Mackie, Aerial Census Expert, Pilot
Dr. Tim Lynam, Senior Research Fellow
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Steven Murray, Program Manager

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Mark Mawson, Chief Guide Pamuzinda Lodge
Frankson Mufichani, Chief in Nyaminyami District
Dr. Rowan Martin, Consultant, IUCN
Dr. Graham Child, Consultant, WISDOM
Mike Jones, Executive Director, WISDOM
Peter Anstey, Mozambique Tchouma Tchata Project Advisor
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Leonard, Chiriwai, General Manager, Bumi Hills, Safari Lodge.

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Jan Van der Heide, Royal Netherlands
Wim Verheught, Team Leader Netherlands CAMPFIRE Project Evaluation Team

FIELD VISITS BY DISTRICT

Gowkwe District (South)
Charles Danda, Campfire Coordinator, Gokwe South Rural District Council

Njekele Dam
P. Fusi, VIDCO Chairperson
Ncube- ZANU PF District Chairperson
T. Guruberu, Councilor

Havano Dam
S. Matshiya, Councilor
Karowa, Campfire Chairperson
Njelele, Chief

List of Persons Contacted, Cont

Mafumgautsi Forest Project
Ward Councilor and Forest Sharing Committee Chair

Gwenungu Dam
T. Gumbesu, Councilor
Chisina, Chief

Sebakwe Dam/Jahana Zebras
J. Dhlohlo, Councilor
J. Jahana, Chief
C. Bhophe, Campfire Chairperson

Beitbridge District
A. Maboyi, CEO
S.Modeme, Campfire Coordinator
Mr Muleya, Campfire Unit Coordinator
Campfire Information Officer
D.J. Maphala, Zimtrust Officer
Jameson Malunguza, Campfire Resource Monitor
Mr. Manyelenga, Resource Manager
Mr. Ndou, Maramani Wildlife Monitor

Chiredzi District
E. Chauke, Campfire Coordinator
Derek A. de la Harpe, Malilangwe Conservation Trust
Jameson Malunguza, Campfire Resource Monitor

Chipinge District
Charles Inggs, RDC CEO

Mahenye Ward Committee

Bulilama-Mangwe District
Christopher Ndhlovu. RDC CEO
Lizwelethu Tshumm, CAMPFIRE Manager
Thandie Chikomo, ZimTrust area manager

Tsholotsho District
J.D.M. Nyoni, RDC CEO
K.M. Tshuma, CAMPFIRE Manager

List of Persons Contacted, Cont

T.S. Magura, A.O. Local Government
Junior Sibana, ZimTrust Area Manager
Jericho Moyo, Training Officer
Siphwe Mpofu, E.O. Health Officer
S.T. Muleya, E.O. Projects
Taywiros, President's Dept.
Chikeweja, OIC ZRP

Gwanda
Sithembile J. Naube, Acting RDC CEO
Phineas Maphosp, HREE Chairman
Phemolo Maplosa, ZimTrust Area manager
Ian Lloyd, Resource Planner, GRDC

Hurungwe
Prisca Pofera, Assistant Wildlife Coordinator.

Bulilimamangwe
T Dube, Zimtrust Regional Manager.

APPENDIX B

SCOPE OF WORK

STATEMENT OF WORK

Mid-Term Evaluation of the Zimbabwe Natural Resources Management Project, Phase II (USAID/Zimbabwe Strategic Objective No. 1)

I. Title

Mid-Term Evaluation Report: Zimbabwe Natural Resources Management Project, Phase II-USAID/Zimbabwe Strategic Objective No. 1.

II. Purpose Statement

Short-term technical assistance services by a multi-disciplinary team of experts are required to conduct a Mid-Term Evaluation of the Natural Resources Management Project, Phase II (NRMP II)[1], more recently redesigned as USAID/Zimbabwe's Strategic Objective No. 1 (SO 1). The evaluation should begin in January 1998 and end no later than March 31, 1998.

Specific evaluation objectives include: (1) assess NRMP II responsiveness to the findings and recommendations of the last Project evaluation; (2) document USAID-funded contributions to CAMPFIRE to date, i.e., what has USAID "bought" with its support; (3) assess the performance of each of the implementing partners in fulfilling their respective roles and responsibilities under NRMP II; (4) document results and impacts achieved to date from this assistance; (5) address certain key policy, planning, management and implementation issues; and (6) recommend revised implementation approaches and arrangements for improving NRMP II achievement and impact, and the prospects for the long-term sustainability of CAMPFIRE as NRMP II progresses toward its final stages of implementation and closeout. The product of these services will be a Mid-Term Evaluation Report for NRMP II/SO1.

III. Background Information

USAID has, since 1989, been providing financial support to CAMPFIRE under the Southern Africa Regional Program's (SARP), now the Initiative for Southern Africa (ISA) Natural Resources Management Project (690-0251.13), commonly referred to as NRMP I. USAID/Zimbabwe's involvement in NRMP I was originally conceived as a pilot effort focusing on four districts in Matabeleland. NRMP II (613-0241) was initiated in September 1994 with a USAID contribution of US$ 20.5 million (including $16 million in bilateral

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[1] The terms NRMP II or Project are used herein to distinguish USAID-funded support to CAMPFIRE from the greater CAMPFIRE Programme or movement (which also receives assistance from several other donors as well). In section IV.D. ("Future Strategic Planning Issues/Questions"), this terminology changes, with USAID's future assistance to CAMPFIRE referred to as Strategic Objective No. 1 (SO 1), in agreement with the recently approved re-design of this program in accordance with USAID's reengineered operating systems and procedures.

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funds). NRMP II seeks to build upon NRMP I and expands the coverage of USAID assistance to CAMPFIRE nationwide.

USAID's assistance to CAMPFIRE was last evaluated in 1994 by ULG Consultants Ltd. [See Midterm Evaluation of the Zimbabwe Natural Resources Management Project (Project Number 690-0251.13), January 1994.] The major findings and recommendations from this evaluation are presented in summarized form in section IV.A. of this Statement of Work, together with a set of pertinent follow-up questions. The evaluation results were used as the basis for the design of NRMP II, as decribed in USAID's Phase II design document entitled Zimbabwe Natural Resources Management 613-0251 Project Paper (September 1994). Through a series of planning workshops and other partner consultations, these design recommendations were subsequently translated into agreed upon implementation workplans for each of the participating partner organizations. The final results of these consultations are reflected in the NRMP II - Zimbabwe Plan of Operations document of June 1995, which served as the basis for the NRMP II-funded contracts and grants with these organizations denoting their specific implementation roles and responsibilities under the Project. Following adaptive management principles, NRMP II has adopted a flexible, design involving annual planning, followed by quarterly review/planning workshops. Therefore, two subsequent annual updates of these partner workplans have also been prepared, reviewed and approved for each of the first two years of NRMP II implementation.

The above-mentioned documents, together with each partner organization's periodic performance monitoring reports and technical reports and other Project-financed documentation, constitute the bulk of the written evaluation reference materials. Supplementary information (e.g., letters, notes, correspondence, etc.) is also available from relevant participating partner organizations. In addition to the above written materials, the team will also obtain information through site visits and interviews with various stakeholders involved in one or more aspects of NRMP II management and implementation.

A diverse group of Government and non-governmental partner organizations provide assistance to CAMPFIRE under the Project. These organizations, currently constituted as the CAMPFIRE Collaborative Group (CCG), include: the CAMPFIRE Association (CA); the GoZ's Department of National Parks and Wildlife Management (DNPWLM) and the Ministry of Local Government and Public Housing (MLG&PH); Zimbabwe Trust (ZIMTRUST); University of Zimbabwe's Center for Applied Social Sciences (CASS); World Wide Fund for Nature (WWF); Africa Resources Trust (ART); and Action Magazine (ACTION). Most of these organizations have been assisting CAMPFIRE implementation since the early years of the program, with or without USAID support.

IV. Evaluation Scope of Work

The evaluation team will review the above key reference documents and other salient information, conduct interviews and site visits, and will perform any other tasks that are required to collect sufficient information to complete a comprehensive Mid-Term Evaluation

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of NRMP II's design, implementation progress and success in achieving its stated sustainable conservation-based community development objectives. In addition to in-country evaluation activities, selected team members will also be required to visit Washington, D.C. and Gaborone, Botswana in order gather information from knowledgeable sources regarding NRMP II's regional and international operations and impact. While extensive interviews will be required of a variety of different stakeholders, the team will be expected to rely, to the maximum extent possible, on existing written and oral information on NRMP II and CAMPFIRE. Therefore, it is not anticipated that any major formal surveys or other primary data collection activities will be required to complete this work. The results of this work will be presented in an evaluation report for consideration and use by concerned U.S.G., GoZ, Non-Governmental (NGO) and community stakeholders. The final methodological details of this Scope of Work (e.g., including team composition; timing, staffing and levels of effort of individual team members; and specific assessment techniques) will be determined by the selected firm through a limited competitive selection process for this work.

The more specific questions and issues to be addressed are described in the following sections of this Scope of Work (SOW). These questions and issues are organized around the following major evaluation topics: (a) follow-up questions from the major findings and recommendations from the last Project evaluation; (b) current salient questions and issues regarding both the greater CAMPFIRE Programme and NRMP II assistance to that Programme; (c) certain management issues and questions arising from the controversy surrounding ongoing U.S.G. assistance to this Programme; and (d) recommendations regarding future strategic directions for ongoing NRMP II support to CAMPFIRE in preparation for the planned SO and Mission graduation and closeout.

In completing this SOW, the contractor shall address the following specific questions and issues and perform the following tasks:

A. 1994 NRM Project (Phase I) Evaluation Questions/Issues

The following are the major findings and recommendations, together with pertinent follow-up questions/issues, from the last evaluation conducted on NRMP I by ULG Consultants Ltd. in January 1994:

1. Finding/Conclusion: The Project is providing meaningful benefits to communal residents in the Project area.

Recommendation: No specific recommendation.

Follow-Up Questions/Issues: To what extent is NRMP II (and CAMPFIRE, in general) continuing to provide meaningful benefits to participating communities? What, if anything, should to be done to augment NRMP II (and CAMPFIRE) benefits to and impacts on producer communities?

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2. Finding/Conclusion: Because NRMP I (as a subset of CAMPFIRE) operated in a discrete geographical area, it was sometimes isolated from the larger CAMPFIRE Programme or movement.

Recommendation: The NRMP II should adopt a national focus.

Follow-Up Questions/Issues: To what extent has the NRMP II adopted a national focus? What have been the major results of this change in the geographic scope of NRMP II operations? What are the implications of this change on greater CAMPFIRE operations? What, if anything, should be done to improve CAMPFIRE-NRMP II coordination?

3. Finding/Conclusion: The (Zimbabwe) NRMP II's attachment to the broader Regional NRMP[2] (including Botswana, Zambia, Namibia and Malawi) has yielded little tangible progress toward achieving regional-level consensus about important wildlife management/conservation issues.

Recommendation: The NRMP's regional focus should be either discontinued or revised.

Follow-Up Questions/Issues: Has regional cooperation/coordination improved under NRMP II? Why/why not? If so, to what extent has the NRMP II and CAMPFIRE benefitted from and/or contributed to improvements in regional-level cooperation/coordination? What, if anything, should be done to improve the NRMP II's contribution to regional-level cooperation/coordination? What, if anything, should be done to improve the Regional NRMP's contribution to the achievement of NRMP II specific objectives?

4. Finding/Conclusion: Project-funded infrastructure (e.g., fences, water points, dams, etc.) has not been subjected to rigorous technical assessments (e.g., environmental, financial, socio-economic, etc.), thus exposing the Project to unknown quantities of risk.

Recommendation: Infrastructure development activities should undergo environmental assessments, engineering reviews and economic analyses to ensure their sustainability and reduce their risk of failure.

Follow-Up Questions/Issues: To what extent has NRMP II and

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[2] Although currently managed by USAID's Regional Center for Southern Africa in Gaborone, Botswana, originally, the Regional NRMP (as distinguished from its respective "bilateral" country-specific component activities in Zimbabwe, Botswana, Zambia and Namibia) was designed and managed by regional elements of USAID/Zimbabwe in Harare until early 1995. Hence, throughout Phase I of the Zimbabwe NRMP and the design and initial implementation of Phase II, USAID/Zimbabwe had the dual responsibilities of managing both its specific bilateral NRMP component activity, as well as the greater Regional NRMP.

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CAMPFIRE implemented policies and procedures to properly review the technical feasibility of proposed infrastructure development activities? What, if anything, should be done to further promote the sound design and implementation of infrastructure development activities?

5. Finding/Conclusion: In general, the success of the NRMP II and CAMPFIRE, owes a lot to the commitment, talent and tenacity of certain key project implementors and participants.

Recommendation: No specific recommendation.

Follow-Up Questions/Issues: To what extent are the NRMP II and CAMPFIRE still driven by key personalities (vs. a more organizationally-driven implementation approach)? To what extent does the commitment, talent and tenacity of certain actors continue to impact positively or negatively on the direction and evolution of the Project and Programme?

6. Finding/Conclusion: Some implementation problems have been attributed to what is perceived as USAID's inflexible, heavy-handed approach to activity planning, implementation and management.

Recommendation: The Project's implementation committee needs overhauling, and USAID's role in implementation approval/decision-making needs to be reconsidered. USAID needs to be more sympathetic to the needs and requirements of small, local NGOs.

Follow-Up Questions/Issues: To what extent has USAID adopted managerial changes which make it more flexible in its dealings with its local NGO partners? Discuss the role and impact of the project Institutional Contractor in this regard. To what extent does USAID's relationship with its NGO partners cause problems in ownership, defining the roles/responsibilities of the various implementing agents and in determining future directions for CAMPFIRE? What, if anything, should be done to improve relationships among all Project partners (expanded team members) in the future?

7. Finding/Conclusion: The focus on Rural District Councils (RDCs) gives the NRMP II and CAMPFIRE a top-down planning/implementation orientation, i.e., activities are not usually initiated as a response to problems identified by individuals, or groups of individuals, at village-level. As a consequence, some communities mistrust the Project and Programme. Moreover, because NRMP II/CAMPFIRE activities are identified, planned and implemented at the district-level, and financial decisions are made at that level, benefits are perceived as being controlled by district-level officials. This has served, in some areas, to undermine community-level commitment to CAMPFIRE.

Recommendation: Control over NRMP II/CAMPFIRE

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planning/implementation needs to be devolved from District Councils to participating producer communities. The Project and Programme need to respond to the demands of individuals, and groups of individuals, at village-level. The control over CAMPFIRE financial benefits needs to be devolved to participating communities.

Follow-Up Questions/Issues: To what extent has the NRMP II/CAMPFIRE taken steps to further devolve authority over indigenous natural resources below the district level? To what extent have RDCs adopted a more bottom-up approach to identifying, planning and implementing Project/Programme activities? What has been done to promote increased devolution/control of CAMPFIRE financial benefits to producer communities? What, if anything, should be done to promote a more bottom-up approach to Project and Programme planning and implementation?

8. Finding/Conclusion: The CAMPFIRE Association, composed of Rural District Councils having Appropriate Authority status, has been identified as the Programme's lead agency. The Association, however, has certain limitations which will need to be redressed for it to assume its leadership role in the Programme.

Recommendation: The CAMPFIRE Association should be given assistance to improve its standing and capabilities within the CAMPFIRE movement.

Follow-Up Questions/Issues: To what extent has the NRMP II assisted the Association in assuming its leadership roles/responsibilities? To what extent have collaborating implementation agencies, as well as the GOZ, accepted the Association's leadership? To what extent is the Association's Secretariat responsive to the aims/objectives expressed by the Association's Board of Management? To what extent has the Association been successful in defining and fulfilling/meeting its roles/responsibilities to its increasing number of members? Discuss the role and impact of the Institutional Contractor in these areas.

To what extent is the Association likely to be sustainable as USAID assistance decreases over time? What should the ultimate role of the CA be? Within the remaining implementation timeframe, what, if anything, should be done to promote the Association's long-term sustainability?

9. Finding/Conclusion: Despite CAMPFIRE's mandate to manage a broad range of indigenous resources (natural and cultural), the Department of National Parks and Wildlife Management views CAMPFIRE as a wildlife management activity.

Recommendation: As CAMPFIRE expands into non-wildlife resource management areas, the Department's role (as the GOZ's representative in Programme decision-making) will need to be reviewed.

Follow-Up Questions/Issues: In recent years, the Department of National

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Parks and Wildlife Management, originally a founding and leading member of the CAMPFIRE Collaborative Group (CCG), and a strong CAMPFIRE proponent, appears to have become less involved with the Programme. To what extent has DNPWLM's participation in CAMPFIRE changed over time? What are the consequences of this change for CAMPFIRE and the NRMP II?

How has this change affected CAMPFIRE's relationship with, and perception by, central Government? To what extent have other GOZ departments/actors become involved in Programme and Project decision-making? To what extent has CAMPFIRE been institutionalized within the GOZ's development policy framework? What has the NRMP II done to strengthen relations and improve communications with concerned central Government agencies and decision-makers? What, if anything, needs to be done to promote continued/improved communications/relations with concerned central GoZ authorities and decision-makers? What, if anything, should be done to promote continued/improved central GoZ involvement in Programme and Project implementation, both generally and as it diversifies into other resource areas?

B. Current CAMPFIRE Questions/Issues

1. Development Hypotheses:

a. CAMPFIRE theory proposes that authority for NRM should be devolved to the "most appropriate level of authority". Is the current **level of devolution of authority** appropriate for the resources being managed under CAMPFIRE? Does the current focus on Rural District Councils (RDCs) as "Appropriate Authorities" limit the achievement of CAMPFIRE's community development objectives? Does it limit CAMPFIRE's movement into community-based management of other, non-wildlife, indigenous resources? Review, assess and discuss realistic alternatives to CAMPFIRE's current devolutionary approach towards CBNRM, using examples, where appropriate, from other similar programs.

b. CAMPFIRE currently focuses on a limited set of indigenous natural resources (mainly renewable wildlife resources). Does the Programme have breadth/depth to include the management of other natural resources and/or **indigenous cultural resources**, such as traditional folklore, arts/crafts, cultural practices, special archeological or cultural sites, etc., under its umbrella?

c. What is the most environmentally, economically and culturally **appropriate land-use strategy(s)** among CAMPFIRE's RDC members? Discuss the primary factors supporting this conclusion.

2. CAMPFIRE Implementation: The contractor shall:

a. Define **the current scope of the CAMPFIRE Programme** or movement (i.e., numbers of participating districts, wards, people; geographic extent of operations; technical area(s) of

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operations; etc.); and

b. Describe **CAMPFIRE's current general financial situation and trends**, including the Programme's primary sources of income. Describe CAMPFIRE's general revenue distribution system, including average proportional allocations to participating Safari Operators, districts, producer wards and communities, and other private, commercial or communal interests. Discuss the appropriateness of CAMPFIRE's current revenue distribution system, with emphasis on the respective proportional amounts of Programme revenues accruing to each system participant. Describe how these revenues are commonly used. Discuss any alternatives for optimizing the use of these funds in the achievement of CAMPFIRE's community development objectives.

c. The **CAMPFIRE Collaborative Group** or CCG (originally the driving force in defining the goals, tenets and policy direction of the Programme) appears to have lost much of its impetus. The contractor shall explain the primary reasons for this development. What are the potential consequences of this "loss"? Have alternative fora emerged which can replace this Programme policy advisory body? What should be the role of the CCG in ongoing Programme operations? What, if anything, should be done to promote the long-term renewal of the CCG?

3. Other Donor Support: The contractor shall:

a. Describe the current and planned amounts and sources of **donor support to CAMPFIRE.** Is this level and mix of resources appropriate for this type of grassroots development program?

b. Discuss current donor coordination in support of CAMPFIRE. What, if anything, should be done to improve coordination of donor assistance to CAMPFIRE?

C. Current Natural Resources Management Project (Phase II) Questions/Issues

1. General: The contractor shall:

a. Describe specifically how, and for what purposes, USAID funds are being spent under the **NRMP II** (i.e., which organizations have received funds, the amount of funds received, and for what activities and purposes).

b. Discuss **the fundamental distinctions between the greater CAMPFIRE movement** (see section IV.B. above) **and NRMP II assistance to CAMPFIRE.** What are the major implications of these distinctions for ongoing Programme and Project implementation and achievement?

2. Design Issues:

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a. The NRMP II design included nine key assumptions (see p. 9 of the Project Paper supplement of September 1994) which needed to remain valid for the NRMP II to successfully achieve its stated objectives. To what extent have these assumptions remained valid? The design also noted several external risks, beyond the manageable interest of the Project, such as the evolution of international conventions on elephant and ivory trade, severe drought, regional political or economic unrest, and international trends in tourism, which could significantly affect the achievement of its objectives. To what extent have these (or other) external factors affected Project (and Programme) implementation and achievements? Discuss recommendations for dealing with these factors in the future?

b. As noted above, following adaptive management principles, the NRMP II has adopted a flexible design approach, involving annual planning, followed by quarterly review/planning workshops. To what extent has this design approach allowed implementors to adjust their plans/budgets to meet changing circumstances? To what extent has this approach allowed implementors to learn from their experiences, and incorporate the lessons learned within future work plans? To what extent have planning/review requirements detracted from management efficiency and/or on-the-ground implementation activities? What, if anything, should be done to improve future implementation planning?

c. The NRMP II's Economic Analysis projected significant increases in CAMPFIRE revenues from non-consumptive resource utilization schemes, particularly wildlife-based eco-tourism. To what extent have these projected increases materialized? What are the real prospects for expanding CAMPFIRE beyond its current focus on the consumptive utilization of wildlife (i.e., especially large mammals) within the NRMP II's existing timeframe? What strategic, financial or other modifications to the existing Project would be required to achieve this Programme diversification objective? What, if any, additional financial or other support would be required in this interest, and how might it be put to the most effective use? [See also Future Strategic Planning in Section IV.D. below.]

3. NRMP II Implementation Issues:

a. The CAMPFIRE Development Fund

Instituted in mid-1995, the CAMPFIRE Development Fund (CDF) is a core Project element. The CDF provides financial assistance, in the form of grants, to support the development of district and sub-district level CAMPFIRE institutions and natural resources management infrastructure.

Due to a variety of factors, CDF implementation has lagged behind initial plans, jeopardizing the achievement of maximum Project and Programme results and impacts. What, if any, actions should be taken to provide for more rapid disbursement of CDF grants to support community capacity-building and infrastructure activities in the future, without sacrificing quality and impact?

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To what extent has the NRMP II facilitated (through the CDF) environmentally sound development planning processes? To what extent have participating RDCs incorporated technical feasibility assessments as a routine element of their development planning? Are the size and scope of existing and proposed CDF capacity-building and infrastructure development grants appropriate? What, if anything, should be done to promote sound sub-activity planning and implementation in the future?

The CDF was designed as a Project-specific mechanism to redress leadership, coordination and customer satisfaction issues identified in NRMP I implementation. How has it performed in addressing these implementation concerns? What, if anything, should be done to improve CDF performance?

Now that the CDF is fully operational under NRMP II, what should be the ultimate status of the CDF? Should the CDF be continued in its present form throughout the remaining life of the Project? Should the CDF remain Project-specific and, therefore, be allowed to dissolve following completion of NRMP II, or should mechanisms be put in place to promote longer term CDF operations in support of the ongoing achievement of Programme objectives? If some longer term approach towards CDF operations is deemed appropriate and worthwhile, what possible mechanism(s) and associated institutional arrangements should be considered for accomplishing this objective (e.g., simple grant fund, matching grant fund, special revolving loan fund, standard commercial loan fund, some type of trust fund or endowment, other)?

b. The Project Execution Team (PET)

Under NRMP II, the Project Execution Team (PET) is the key Project implementation coordination and decision-making body. How effectively has the PET functioned in Project planning, implementation, coordination and communications? How effective has the leadership of the CAMPFIRE Association been in this regard? Discuss the role and impact of the Institutional Contractor in these areas. What, if anything, should be done to improve PET performance in the future?

How effective have the PET sub-committees (e.g., monitoring/evaluation, training, information/communication, etc.) been in planning and coordinating inter-agency activities? What, if anything, should be done to improve PET sub-committee operations and effectiveness in the future?

Discuss the relationship between the PET and the CCG. [See section IV.B.2. above.] What should this relationship be? What, if anything, should be done to promote coordinated PET-CCG operations in the future?

How effective and efficient has each of the implementing partners been in executing their respective agreed-upon Project/Program roles, responsibilities and activities, e.g., training, institution building, research, feasibility studies, infrastructure, information dissemination,

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advocacy, etc.? What has been the impact to date of this collective work? How do these results compare with the Project's design targets and objectives? What, if anything, should be done to improve individual partners' implementation performance in the future? What, if anything, should be done to improve NRMP II's progress in achieving its stated results and objectives?

How effective have implementing partners been in instilling a sense of Programme ownership among participating RDCs? To what extent are the implementing partners' work plans responsive to beneficiaries' demands for services? To what extent has an effective Customer Service Plan been put in place to monitor RDC clients' level of satisfaction with the services being provided to them by each of the various implementing partners? What, if anything, should be done to promote improved responsiveness and accountability to RDC and community customers?

How effective have implementing partners been in communicating the results of their research/investigations to participating RDCs? What, if anything, should be done to improve the partners' communications with their RDC clients in the future?

4. NRMP II Management Issues:

During the run-up to this year's 10th Conference of the Parties (COP 10) to the Convention on International Trade in Flora and Fauna (CITES) in Harare, the NRMP II and CAMPFIRE came under intense attack from a variety of animal welfare groups opposed to trophy hunting of wildlife, particularly elephants, and the resumption of the trade in elephant ivory. This opposition has resulted in extended debate in the U.S. Congress regarding the relative merits and liabilities of continuing U.S. Government support to CAMPFIRE.

The contractor shall address the following questions and issues emanating from this debate:

a. To what extent, if any, is the NRMP II supporting or promoting **trophy hunting**, particularly, but not exclusively, of elephants, in Zimbabwe (directly or indirectly)? To what extent, if any, has the Project facilitated, fostered or encouraged, the growth and development of legal wildlife offtake (i.e., commercial sport hunting, subsistence hunting, cropping) on communal lands? To what extent, if any, has the Project discouraged, reduced or stopped the illegal offtake (i.e., poaching) of wildlife on communal lands? What has been the impact of Project activities on the status of wildlife in participating communal areas? Is wildlife management the most environmentally, economically and culturally appropriate land-use among CAMPFIRE's RDC constituents?

b. To what extent have NRMP II funds been used for "**lobbying**"[3], regionally,

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[3] The term "lobbying", as used here, relates to host country, regional and international advocacy activities. It does not/not include formal U.S.G. lobbying as prohibited under Office of Management and Budget Circular 122A (as revised). Therefore, the team is not being asked to make any judgement regarding the legality of the various activities

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internationally and/or in the U.S., for the downlisting of the African elephant and the resumption of the ivory trade under CITES, the U.S. Endangered Species Act or for other positions with respect to U.S. legislation or international treaties or conventions? Considering the existing focus of CAMPFIRE activities, is "international lobbying" or advocacy for the promotion and development of natural resource product markets appropriate and justified? Is it appropriate to use U.S. assistance funds for such activities? Have U.S. assistance funds been used for similar activities in other sectors? What has been the role and results of Africa Resources Trust and/or the CAMPFIRE Association in these endeavors? What, if any, are the potential impacts on CAMPFIRE producer communities from these activities? What steps have the Mission and its partners taken to address expressed concerns regarding the use of U.S. funds for such activities? Are these measures justified and appropriate in this instance? What, if any, additional measures might be taken to ensure that these concerns are handled in an appropriate manner?

c. During the course of the current debate surrounding CAMPFIRE, USAID's support for CAMPFIRE under the NRMP II, and the Program's relationship to CITES and other international treaties and conventions, several important Agency policy issues have arisen. These issues include: (1) the Agency's position on sustainable use vs. other more "protectionist" or conservation-oriented environmental management philosophies or strategies (particularly, but not exclusively, as related to sport hunting, in general, and big game hunting, in particular, per the first Management Issue above); (2) use of USAID funds to support the role of Agency NGO partners in developing and promoting regional and international markets for wildlife and other products of community-based natural resources management programs (as per the second Management Issue above); and (3) use of USAID funds to support the role of Agency NGO partners in regional and international networking, information dissemination and advocacy activities (as distinguished from the inappropriate "lobbying" activities disscussed above). While much of the current debate surrounding these issues has remained largely Zimbabwe-specific to date, Agency policy on these subjects ultimately has worldwide program implications, some of which extend well beyond the environmental sector (e.g., USAID funding to support partner NGOs in advocating for a particular position at recognized relevant regional and international fora (even if that position might not agree with current Agency or U.S.G. policy on the subject in question).

Current Agency Strategy includes "Environment managed for long-term sustainability" as its "environmental" Goal (No. 4). Included among the five Objectives contributing to the achievement of this Goal are "Biological diversity conserved" (4.1) and "Sustainable natural resource management" (4.5), as the two Agency objectives of most relevance to USAID/Zimbabwe's NRMP II/SO 1. Among the various "Agency Program Approaches" for achieving these objectives are "Promoting sustainable use of biological resources", and "managing forests...,...water resources...(and)...coastal zones sustainably". Yet, beyond this

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completed under the NRMP II to date; but, rather, to simply describe their understanding of the extent to which Project funds have been used to support regional and international advocacy activities by implementing partners (e.g., notably Africa Resources Trust and the CAMPFIRE Association), and to describe the types of activities undertaken.

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existing strategic framework, there has been little guidance on preferred strategic approaches for pursuing these worthwhile objectives.

Similarly, Office of Management and Budget (OMB) Circular 122A (as revised) provides detailed guidance on restrictions against the use of U.S.G. funds for lobbying U.S. officials and legislators on domestic U.S. legislation. However, there is little or no clear guidance on the use of such funds for regional and international advocacy activities (i.e., addressing regional or international topics outside of the U.S. with non-American officials and counterparts), such as that under consideration here for CITES and other international treaties or conventions.

In view of the above, and based upon the team's above findings in each of these three critical policy areas, including importantly the results of its USAID/W consultations, the contractor shall articulate current USAID policy on these important strategic topics. In the team's opinion, is USAID's approach to these policy areas appropriate for the current international environmental management context? Is this approach appropriate for the current international developmental context? Has this approach been sufficiently well defined, articulated and communicated to properly guide specific country program achievement? What, if any, recommendations might the team have regarding Agency policy in these areas? What, if any, recommendations might the team have regarding the application of this policy in this instance?

D. Future Strategic Planning Questions/Issues

a. As described in section IV.C. 2. above, the NRMP II's adaptive management approach towards implementation calls for a rolling approach towards Project design. This rolling design approach specifically includes provision for the periodic review of implementation, with adjustments in design and/or resource allocations depending upon the performance of the various implementing partners and design components. In this interest, the contractor shall review NRMP II implementation performance to date and provide recommendations for any modifications, including any associated reallocations of existing Project resources, which may be required to improve future performance and otherwise enhance the achievement and sustainability of its results within the remaining two years of implementation under the existing FY 2000 graduation scenario.

b. In accordance with USAID's reengineered operating principles and procedures, the Mission has recently completed a new draft **Results Framework (RF)** for Strategic Objective No. 1 (SO 1) which delineates USAID's strategy for ongoing assistance to CAMPFIRE through the end of FY 2000 (i.e., the current SO 1 graduation date). The contractor shall carefully review this document, both internally and with concerned USAID and partner representatives, to determine its appropriateness for the successful achievement of SO 1's stated objectives. More specifically, the contractor shall assess the appropriateness of all of the draft RF components (i.e., rationale, development hypothesis, results framework, results packages, and performance monitoring and customer service plans)? What modifications, if

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any, would the team recommend in any of these strategic components?

c. State cable 116224 (dated 6/20/97), relates the results of USAID/W's review of this proposed SO 1 strategy. The cable indicates the possibility of additional time and funds for SO achievement, primarily in the interest of diversifying program resource use activities beyond the current heavy focus on wildlife, in general, and large mammals (elephants), in particular. The contractor shall assess the relative feasibility of this proposal, and how it would most effectively accomplished. What amount of **additional program resources** would be required to accomplish these diversification objectives within the specified additional two years of SO 1 implementation (i.e., FY 2002 SO 1 graduation scenario)? How would these additional resources be most effectively allocated and used to accomplish these objectives within this revised SO 1 planning period?

d. What should be the bilateral **Mission's role** (vs. other Agency operating units, such as Africa Bureau and the Regional Center for Southern Africa, and/or donors) in any ongoing assistance for Zimbabwe's CAMPFIRE? Are there certain areas of **comparative advantage** for U.S. (vs. other donor) assistance in this regard? What suggestions might the team have for the most strategic application of any additional U.S. assistance to this program, considering USAID/Zimbabwe's planned graduation and closeout in FY 2003?

e. Under the existing FY 2000 graduation scenario, the strategy proposes the following measures of SO achievement and **sustainability**: (i) an effective CAMPFIRE Association; (ii) ten percent (%) of member communities, or approx. 20 communities, "graduated" with well-functioning, financially sustainable and environmentally sound NRM programs making regular and substantial contributions towards meeting their communal residents' development needs and expectations; and (iii) an additional 50% of member communities in various stages of planning and implementing such NRM programs. Under the expanded and extended FY 2002 graduation scenario, another set of performance measures has been proposed as follows: (i) a sustainable CAMPFIRE Assocation; (ii) up to 30% of "graduate" member communities (50-60 communities) as defined above; and (iii) an additional 50% of member communities in various stages of planning and implementing such NRM programs, including pilot sub-district level CBNRM regimes. The contractor shall determine to what extent these SO-level indicators and targets are appropriate, i.e., can they be appropriately measured and monitored for SO 1 performance purposes? Are they realistic for the specified timeframes and resource levels? What changes might the team recommend in these indicators and targets for improved measurement and monitoring of SO achievement and sustainability? And, if achieved, what would be the implications for greater CAMPFIRE sustainability under each of these two scenarios? What could be done to improve the prospects for CAMPFIRE sustainability following the cessation of USAID assistance?

V. Work Products

The contractor evaluation team shall schedule and conduct entry and mid-term briefings during the evaluation with concerned USAID, GoZ and CCG staff. The team will produce

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draft and final reports which will include detailed findings, recommendations, lessons learned and other salient results of the analysis specified in the above SOW. The draft report will be submitted to the COTR, USAID/Zimbabwe and concerned GoZ agencies (i.e., MMET, MoF, MLG&PH) and CCG organizations no later than March 1, 1998 for review, discussion and comment prior to finalization. The team will hold individual or joint debriefing session(s) with concerned USAID, GoZ and CCG personnel approximately two weeks following draft report submittal to discuss the report's findings and recommendations and facilitate the review and comment process.

The contractor shall submit the final evaluation report no later than March 31, 1998. Thirty-five (35) bound copies of the final report should be submitted to the COTR, USAID/Zimbabwe, who will assume responsibility for subsequent transmittal to other concerned agencies, together with an electronic copy of the final report in WordPerfect format for subsequent printing, dissemination and use. The Contents of the Final Evaluation Report are included as Annex 1 to this Statement of Work.

VI. Team Composition and Qualifications

The evaluation will require a multi-disciplinary team of experts over the three month period January-March 1998. Final team composition, and the timing and level of effort of individual team members, will be determined by the selected firm through a limited competitive selection process for this work.

Suggested key team disciplines include environmental/natural resources (E/NRM) policy and strategic planning, community-level capacity building and institutional/organizational development, social anthropology, resource economics, and wildlife management and ecology. Additional possible areas of desirable expertise include general natural resource management (in such areas as fisheries ecology, forestry and silvicultural operations, etc.), eco-tourism development, natural resources marketing, business mangement, sustainable E/NRM financing mechanisms, program and project planning, management, implementation and monitoring and evaluation.

Due to the great prominence of this program and importance of this evaluation, to the maximum extent possible, all team members shall be experienced senior-level professionals within their respective areas of expertise. The team members shall possess an advanced degree and a minimum of ten years of work experience within their respective areas of expertise, at least half of which should have focussed on LDC situations. Demonstrated experience in Africa is mandatory for all team positions; prior southern Africa experience, in general, and Zimbabwe experience, in particular, is highly desirable. At least several team members shall possess demonstrated experience in planning, managing and implementing national, regional and/or international community-level development initiatives in LDC contexts. Prior USAID experience in these areas, as well as evaluating USAID programs and projects is highly desirable; familiarity with USAID's new reengineering principles and procedures is also highly desirable. All team members shall also possess well-developed

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written and oral communications skills, including a good working knowledge of standard computer word processing and spreadsheet applications. Finally, for maximum credibility, no team member(s) shall have had direct prior employment relationship with the NRMP, or with any of CAMPFIRE's implementing partner agencies.

VII. Team Reporting Relationships and Responsibilities

The contractor will receive technical direction from the USAID/Zimbabwe Mission Director or her designee (i.e., the SO1 Team Leader).

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APPENDIX C

THE EVALUATION TEAM

The Evaluation Team

Dr. Frederick W. Sowers, Team Leader, is an environmental geographer with 20 years experience in natural resource management programs in Africa, Latin America, and Asia. Dr. Sowers previously served in the USAID's Office of Evaluation as technical coordinator for a multi-year assessment of the performance and impact of the Agency's environment and natural resource management programs. Dr. Sowers has led and participated in numerous natural resource and biodiversity conservation project evaluations, including of Zambia's ADMADE program, conducted in 1995. He is currently involved in private conservation and ecotourism in Mexico and Honduras. In the evaluation, Dr. Sowers focused on general USAID issues, CAMPFIRE's regional dimension, lobbying, ART, and overall evaluation coordination and reporting.

Dr. Thomas J. Cook, Research Triangle Institute's (RTI) Principal Scientist in Social Science and International Development, has more than 20 years' experience in performance monitoring and program evaluation, strategic planning and management, social science research, and program evaluation methodology training. He leads RTI's international work in the program evaluation and performance measurement sectors. His international experience includes work for the World Bank, United Nations Development Programme, Asian Development Bank, USAID, J. Paul Getty Trust Conservation Institute, and the Eurasia Foundation. He has managed the design of a monitoring and evaluation system for the Environmental Division, USAID/Cairo, and led an evaluation for the UNDP Democracy and Governance Program in Moldova. On this evaluation, Dr. Cook addressed devolution, socio-political issues of CAMPFIRE, and the CA and USAID strategic planning.

Dr. Robert Davis, who has degrees in economics, agriculture, agronomy, and public administration, is an economist who specializes in natural resource management, with an emphasis on wildlife and rangelands, water resources, and fisheries. Currently working as Senior Associate at the University of Colorado's Institute of Behavioral Science, Dr. Davis previously served as Assistant Director for Economics in the US Department of Interior's Office of Policy Analysis. Dr. Davis has international experience in wildlife, national parks, biological diversity issues, and water resources. He has authored major studies of water resource economics and policy, including a book on the Okavango Water Resource Development Project in Botswana, written for Resources for the Future. He was stationed in Kenya as Ford Foundation economic advisor to the Kenya Ministry of Tourism and Wildlife, and subsequently as Visiting Senior Research Fellow at Kenyatta University's Institute for Development Studies, from 1976 to 1980. On this evaluation, his areas of focus were wildlife and land management issues and the economics of wildlife management and alternative NRM options.

Dr. Lynn Ellsworth is an independent consultant specializing in institutional and economic analysis of non-project and public organizations. She brings expertise in such areas as design and evaluation of grant programs, development of sustainability plans for organizations, and methodologies for organizational change. She has four years of consulting experience with non-profits in the US, Eastern Europe, Madagascar, and East Africa, and six years experience as a donor and grant-maker in West Africa with the International Development Research Centre. On this evaluation she focused on CAMPFIRE sustainability issues and on the CDF, CA, and IC and their interrelationships.

The Evaluation Team, Cont

Dr. Richard Alan Swanson has spent most of his professional career since 1973 outside the US, working closely with various donor agencies, host governments, academic institutions, international institutes, and rural communities in Africa, Asia, and the Caribbean, frequently as Chief of Party. Recently, he assisted in the creation and institutional development of Madagascar's first National Parks Service, a not-for-profit NGO. He has expertise in program impact monitoring and evaluation, agricultural anthropology, rural development, village/farm level socio-economic studies, and rapid rural reconnaissance surveys on such diverse topics as analysis of human pressures and their causes on protected areas of natural resources. Dr. Swanson also brings expertise in geographic information systems (GIS) and natural resource management. On this evaluation, Dr. Swanson's focus was on the benefits gained natural resources, the NRMP II program inputs made by the different constituents of the CAMPFIRE program, diversification options, and devolution of authority to local producer communities. Dr. Swanson also contributed to the report preparation and stakeholder review processes.

Dr. Richard G. Ruggiero, a wildlife specialist, whose primary fields are wildlife ecology and management, has worked in the United States, Kenya, the Central African Republic, the Republic of Congo, and Burundi. Primary areas of interest include the design and management of protected areas, instruction in wildlife biology, conservation biology, and related issues at the university and graduate level, training in field research and management techniques, and in-service training for wildlife professionals. His research has covered a range of topics, including large mammal and avian ecology, wildlife and forest management issues, and the use of wildlife resources by indigenous peoples. On this evaluation, Dr. Ruggiero looked at data quality for monitoring wildlife, including quota-setting, the ecological and technical merits of wildlife management over other options, and land-use planning and management schemes.

APPENDIX D

ITINERARY AND FIELD PROTOCOLS

Current Campfire Questions

Issue: Devolution of Authority (B.1.a)

1. **The Rural District Councils are the current "Appropriate Authorities"**

Is this the most appropriate level of devolution?
Does this level limit the achievement of C community development objectives?
Does this limit C's ability to move into other NRM management, non-wildlife indigenous resources?
What are realistic alternatives to CAMPFIRE current devolutionary approach to CBNRM (examples from other programs)(concessions, associations....)

2. **What is the authority of specific wards?**
3. **Describe how RDC actually work (exec. Committee, district council, wards, villages)**

Village (campfire sub-committee – village development committee VIDCO)
Ward (campfire sub-committee – ward development committee (WADCO)
District (campfire sub-committee – District Dev. Committee
District Council
Campfire Association (made up of elected wards) (is there an exec. Committee and who are they)

Which districts have permitted or encouraged creation of ward or village level concessions (as opposed to district controlling everything)

What do they think their decision making prerogatives are concern NR (at each level)?
What areas do they think they should have increased authority concerning NRM?
What do you see as primary barriers to having greater decision making for NRM?
Over last 10 years, what have been the greatest changes for NRM in their area?
What are most immediate changes which need to occur to get their decision making authority to point it should be over next 4 years? (personnel, institutional, policy, etc.).

DIVERSIFICATION

4. **Wildlife resources currently main income generator of CAMPFIRE districts. What do they think about diversification into other areas (forestry, cultural resources, traditional folklore, arts/crafts, bee-keeping, Mopane worms, etc. (cf. Table on Diversification). Do you think you could do more in diversifying?**

What do you see as main areas for potential diversification? How do you learn about new opportunities?
How could program funds he focused on this issue most effectively (in these areas)?
What are major barriers for diversification? How to overcome these?
Would there be greater potential for local management control (village level) being ceded by Rural District Councils, and what are implications for this. (Maybe conditionally for all future USAID funds to be used for this kind of management (with 90% for village 10% for RDC support)? Long term concession agreements with Monitoring.

5. **Will districts where wildlife is already important have much interest in moving in this direction? Will they be open to granting concessions to local villages or wards for managing non-wildlife resources? How would this work with current government regs?**

LAND USE

6. **What is most environmentally, economically, and culturally appropriate LAND USE strategy among CAMPFIRE RDC members? (Wildlife No one – even in non-wildlife areas?)**

Do you think wildlife management is most appropriate use of land?
Who are the key decision makers about land use (agriculture, herding, wildlife, tree farms,...), and how are land use decisions make (a few elite, community debate, individually, etc.
Do you think there is sufficient community involvement in land use debates?

In last few years, have there been decisions concerning land use in district which you think was unfair to community? Why?

7. Do RDC's really represent the interests of their constituents (wards, villages) or simply of a governing board of influential people at the district level, for their own ends?

8. How top down is decision making at this level?

9. **How many wards are found within various districts? And How many villages within these Wards? How many of these are essentially wildlife rich ones which are providing significant income to the district (or have this potential)? How are these resources shared?**

10. **How do villages with wildlife areas really view the benefits of schools, (ie. social projects) as opposed to household level income benefits and their support to the inconveniences of wildlife presence (field damage, etc.)**

1.0 Benefits Analysis at District Level

Intended Benefits	Perceived Benefits by Recipients	Observed Benefits Evidence of Benefits	Benefits Gap Analysis
Direct Management of NRM	Do you think the DC has control of the NR of your district? How do you exercise this control? Voice in Decision Making	How much money did the DC receive from NRM? How do they exercise legal authority?	
Sustainable NRM Practices adopted or applied by Campfire communities	Are receiving funds?	Graduate DL Schools, wells...	
Bio-physical Monitoring System in Place	Establishment of Quotas; Status of NR Base	Setting of Animal Quotas in Approp. Manner	
Improved Surveillance			
Improved NRM Technical & Entrepreneurial skills Community Satisfaction with Campfire Services Information Flow/Reports/Docs. Received and Read Equitable Financial Management Access to Market Information	What do they perceive to be benefits? Worthwhile? Do they feel are receiving fare share of proceeds? Do you have info. On best way to sell NR products	Existence of a DataBase	

Benefits Analysis at Ward Level

Intended Benefits	Perceived Benefits by Recipients	Observed Benefits Evidence of Benefits	Benefits Gap Analysis
Direct Management of NRM	Do you think the DC has control of the NR of your district? How do you exercise this control?	How much money did the DC receive from NRM? How do they exercise legal authority?	
Sustainable NRM Practices adopted or applied by Campfire communities		# of Wards with established NRM Practices?	
Bio-physical Monitoring System in Place			
Improved Surveillance			
Improved NRM Technical skills Community Satisfaction with Campfire Services Information Flow/Reports/Docs. Received and Read Equitable Financial Management			

Benefits Analysis at Village Level

Intended Benefits	Perceived Benefits by Recipients	Observed Benefits Evidence of Benefits	Benefits Gap Analysis
Direct Management of NRM	Do you think the DC has control of the NR of your district? How do you exercise this control?	How much money did the DC receive from NRM? How do they exercise legal authority?	
Sustainable NRM Practices adopted or applied by Campfire communities		# of Villages in Wards with established NRM programs?	
Bio-physical Monitoring System in Place			
Improved Surveillance			
Improved NRM Technical skills Community Satisfaction with Campfire Services Information Flow/Reports/Docs. Received and Read Equitable Financial Management			

Benefits Analysis at Household Level

Intended Benefits	Perceived Benefits by Recipients	Observed Benefits Evidence of Benefits	Benefits Gap Analysis
Direct Management of NRM:	Do you think the DC has control of the NR of your district? How do you exercise this control?	How much money did the DC receive from NRM? How do they exercise legal authority?	
Sustainable NRM Practices adopted or applied by Campfire communities		# of Households in Villages with NRM programs	
Bio-physical Monitoring System in Place	Any idea of #s of Wildlife species?	Elephant or other animal funds	
Improved Surveillance			
Improved NRM Technical skills Community Satisfaction with Campfire Services Information Flow/Reports/Docs. Received and Read Equitable Financial Management			

APPENDIX E

LOGICAL FRAMEWORK TABLE

PROJECT NO. 690-0251

ORIGINAL AUTHORIZATION: 20 AUG 89
CURRENT PACD: 31 AUGUST 1997
PROPOSED PACD: 31 AUGUST 1999

CRC: 09 SEPTEMBER 1994

LOGICAL FRAMEWORK
NATURAL RESOURCE MANAGEMENT PROJECT

ZIMBABWE : AMENDMENT NO. 2

NARRATIVE	ACHIEVEMENT & MEASURES	VERIFICATION	ASSUMPTIONS
GOAL: The development of economically sustainable communities on lands marginally suitable for agriculture.	– Community food security. – Incomes above subsistence, and in rising trend. – Wildlife resource base and revenues increasing.	– Nutrition surveys. – Income surveys. – DNPWLM reports.	– Food is available and affordable. – Incomes growth exceeds inflation. – National disasters do not eliminate wildlife resources in target areas.
PURPOSE: To expand community-based natural resource management and utilization throughout marginal lands nationwide; and to halt declines within the wildlife resource base, especially in Regions IV and V.	– NRM programs underway in 23 districts, with more looking to join. – Revenue distributions made to all participating communities. – Stable wildlife populations in targeted areas.	– DNPWLM and NGO reports; USAID site inspections. – Indications of interest from non-participating communities. – RDC reports. – DNPWLM reports.	– Continuing market for wildlife and veld products. – Communities are willing and able to learn and practise wildlife management. – Continued granting of Appropriate Authority status. – National will to protect endangered species.

NARRATIVE	ACHIEVEMENT & MEASURES	VERIFICATION	ASSUMPTIONS
OUTPUTS: 1. Community-level resource management capacity institutionalized.	Communities making own decisions. By-laws covering revenue uses. Land-use plans.	Site inspections. ZT reports. RDC reports.	Community consensus maintained.
2. Strengthened CA.	Communities represented by CA in fundraising and government and international relations.	Contractor reports.	CA accepted by communities as legitimate representative.
3. Knowledge of NRM increased.	Mass circulation publications.	ART reports and videos.	Popular receptivity to the concept of sustainable utilization.
4. Education and outreach expanded.	Specialized technical publications.	ACTION, CASS, WWF reports and videos.	ACTION, CASS & WWF continue to produce high quality materials.
5. Policy analyses complete.	Studies sufficient to support continuation or change in Strategic Objective No. 1.	AID decision re continuation or change.	CPSP can be modified.
6. Networking and communications systems in place.	Periodic meetings of CCG and its committees. CCG members' collaboration in field activities and publications.	CA reports. CCG member reports.	Inter-organizational conflict does not undermine the networking process.
INPUTS: Two Community Funds Technical Assistance Training Commodities Operations/Overhead Audit Evaluation	Amounts: $ 6,000,000 6,000,000 2,255,000 2,175,000 3,790,000 80,000 200,000 $ 20,500,000	- USAID Controller records - Contractor reports - Audits	- Grantee in compliance with Agreement - Funds available

APPENDIX F

GWANDA RURAL DISTRICT COUNCIL

Gwanda Rural District Council

Evaluation Team Field Trip

Information obtained from discussions with field staff and documentation are provided as representative of information obtained which helped lead team to conclusions and recommendations drawn. Mr. Ian Lloyd was particularly helpful in providing this information.

Doddleburn Ranch

Year	Income Source	Amount
1995	Hunting Safari: Inhlaba Safari	$209,250
1996	Hunting Safari: Tehabezi Safari	$26,484 (received the quota very late, hence a small return)
1997	Hunting Safare: Tshabezi Safari Crocodile Egg Collection: Mr. Evans	$183,400 (this will rise as there is a small amount outstanding) $630
1998*	Hunting Safaris Ilanga	$10,000 + US$ 17,152.50

Thull Shashe Concession Area

Year	Income Sources	Amount
1995	Hunting Safaris: Gariya Safaris	$10,650
1996	Hunting Safaris: Gariya Safaris	$15,610
1997	Hunting Safaris: Ilanga Safaris	$71,433
1998	Hunting Safaris: Ilanga Safaris	$10,000 + US$ 8,250

- Expected income. Money is in Zim dollars unless stated.

Dividends are distributed as follows:
50% to communities, distributed through the six wards concerned (of 20 within the district
34% retained by Council to cover management costs (i.e. game scout wages, diesel for the irrigation machines, uniforms, ammunitions, etc.)
14% retained by Council to cover administration costs (i.e. stationary, staff time for liaison with Safari operators, Parks, CA, Zimtrust, etc.)
2% Campfire Association levy

It should be noted that the concession fees are retained by the Council.

Dividends (the 50%) returned to the 6 wards concerned, to date, are presented below:

Ward	'95 Revenue Distributed in 1996	'96 Revenue Distributed in 1997	'97 Revenue Distributed in 1998	Total	Expected '98 Income to be Distributed '99
14	25,406.25	2,998.12	21,753.75	50,158.12	US$ 2,144.06
15	26,006.25	3,448.12	24,253.75	53,708.12	US$ 2,594.06
17	25,406.25	2,998.12	21,753.75	50,158.12	US$ 2,144.06
18	25,406.25	2,998.12	21,753.75	50,158.12	US$ 2,144.06
19	300	.....	8,333.25	8,633.25	US$ 1,000
20	2,295	6,305	24,888.25	33,483.25	US$ 3,125
Total	104,820	18,747.48	122,731.50	246,298.98	12,701.24 (Z$ 203,220)

This table shows something very important. Zimbabwe experiences inflation of around 30%. Because safari operations are calculated in US$, this income is inflation proof, therefore assuring local communities significant and fairly safe revenue generation – something they can not get from any other form of local revenue generation which does NOT keep up with inflation.

Community use of Campfire Funds:
Fully 50% of funds received by the District Council from wildlife safari concessions within the district are given back to local communities. It is entirely the communities which decide how they wish to spend this money. To date, money has been spent on school furniture, roofing materials for a school, rehabilitation on a dam.

Other Natural Resources in the Gwanda District

Many minerals are found within the district, with a large cement factory and numerous gold mines. Gwanda has a large area of Commercial Farms which are predominantly large cattle ranches, although there are numerous farmers which manage their properties for game and game hunting.

Numerous Rock Paintings (some in caves) and other historic sites exist of interest to a potential tourist viewing. The district has approximately 150 small to medium dams (in varying states of repair) some of which are used for irrigation and most of which contain fish which supplement the local diet. It is noted that some of the commercial farmers raise funds by charging fishermen for the right to fish.

A fairly healthy population of natural wildlife exists through the district. Though few elephant and buffalo, there are many soft plains game (antelope).

Natural Resources with potential for use under the CAMPFIRE programme

Crocodiles are used both for the collection of eggs and in rearing of crocodiles (for meat and hides). A project proposal is currently being developed as part of the Campfire programme for the establishment of a small hatchery.

Mapane tree caterpillars "Macimbi" are already harvested in Gwanda, although at present this is fairly small scale and not done commercially. Some Campfire committees are already regulating and charging for the collection of such caterpillars.

Fish from the numerous dams. Some dam committees are already regulating and charging for fishing. The potential of fish farming in some of the larger dams is currently being investigated. There is potential for ecotourism in regard to fishing.

Amarula fruit are already harvested in Gwanda, although at present it is fairly small scale and not done commercially. There is potential for commercial production.

Ecotourism, in terms of game viewing, fishing, viewing of rock paintings, etc. has a huge potential as the district is currently very under utilized in this area.

It is important to note that the Campfire programme is very young in Gwanda. This RDC only received appropriate authority in 1994, with the program actually starting in 1995. Many potential projects have not been fully explored, and the current program is still heavily focused on community training.

APPENDIX G

CDF REVISION AND EXTENSION BACKGROUND MATERIAL

Background for Support and Extension of the CDF

This appendix relates to the recommendation made by the evaluation team to extend the functional life of the CAMPFIRE Development Fund initiated under NRMP II by transforming it into a locally managed fund which would be distributed according to revised criteria over a longer period of time. The appendix describes a process or requesting proposals, offers draft text for a proposal solicitation brochure, suggests a review procedure, and considers some operational observations based on the team's fieldwork.

A. Two Stage Proposal Process and Call for CBNRM Project Ideas

First draft a brochure or ***Call for CBNRM Project Ideas*** that explains the competition, eligibility requirements and judging criteria. This document should be widely published (newspapers, radio interviews with project officers, faxes and mailings to NGOs working in CBNRM). The document invites organizations to submit CBNRM project ideas that are consistent with CAMPFIRE principles. Applicants would send in their project ideas and a neutral jury (composed of qualified experts from both within and outside the CCG/CA) would rank and choose winners. Winners would be invited to submit full proposals. They might then be given small grants or consulting assignments to fully develop their concepts into full-scale proposals. Of course, organizations who submit the winning project ideas would still be subject to a pre-award survey to determine if they would be eligible for a grant and, if so, under what terms of payment.

Initially, USAID and MLGNH would step back from the CDF approval process by taking only an oversight role. This rotating jury would be charged with ranking and commenting on grants and scoring them according to fixed criteria. Their ranks, scores, comments, and recommendations for funding would then be forwarded to the IC for official approval. The chain of approval should stop there. The IC would retain the right to countermand the independent panel's recommendations and rankings. In practice, this right should be exercised only rarely and, when exercised, the reasoning should be well documented.

In this transition scenario a clearer and simpler decision rule needs to be established to decide when cash advances are permissible. This needs to be documented and explained to potential grantees.

The current list of criteria should be reformulated in brochure form so as to be easier to read and to make it clear that CBNRM micro-credit projects at the village and ward level are welcomed by CDF as would participatory land-use planning and income-generating activities. In the brochure for the CDF, distinction should be made between "eligibility requirements" and "review criteria".

In general, grants should not be made for salaries, infrastructure, or capital equipment valued at more than $US 10,000, total. Neither should grants ordinarily cover organizational overheads or indirect costs of support NGOs of more than about ten percent.

In addition to existing criteria, proposals should be reviewed for:

a) the extent to which CAMPFIRE principles are evident in the design and

structure of the grant and in the work of the requesting organization -- including commitment to revenue-sharing concepts.

b) Visible evidence of widespread village and ward support for the design and structure of the project.

c) Evidence of the use of participatory methods for project development and participatory plans for project implementation (copies of PRA results would for example serve as evidence).

Funding decisions (yes/no/yes with limited conditionalities) by the neutral jury should be made at regular intervals, perhaps quarterly or semi-annually. Any number of specialized competitions might be organized according to USAID and CCG group interest. Examples are research grants, micro-credit grants, conservation and CBRNM activities, cultural and ecotourism development, etc.

CALL FOR IDEAS

THE CAMPFIRE COMPETITION FOR IDEAS IN COMMUNITY-BASED NATURAL RESOURCE MANAGEMENT

USAID has established a grants fund for community-based natural resource projects, programmes, and research activities. A total of $Z 25,000,000 per year is available.

Grants will be given in three categories:

One time small projects of limited duration;
Programmes of activities that cover one or more villages, wards, or Districts and that take place over a 12-24 month time-frame;
Applied, action-oriented, and policy research.

Grants will be awarded in each category in a two-stage competition. In the first stage, eligible organizations are invited to submit a 3-5 page document explaining their project idea, programme idea, or research activity along with a one page cost estimate. These ***IDEAS FOR FUNDING*** *will be judged by neutral reviewers. Winners will then be invited to submit a fully developed programme or project document. Winners at this first stage will receive a small* ***planning grant*** *to enable them to fully develop their idea. The* ***planning grant*** *can cover feasibility studies, economic analysis, participatory rural appraisals, and planning workshops. Winners of the planning grant can then submit their fully developed ideas to a second-stage review during which they can be awarded full or partial fund grant for a maximum of two-years of activity.*

WHO IS ELIGIBLE?

The idea must come from a registered Zimbabwean charitable, educational, scientific, or religious organization or an international NGO operating in Zimbabwe. A copy of the organization's constitution, by-laws, and registration number must accompany the initial idea, as well as a list of board members a list of staff members.

Publicly-funded organizations in good financial standing with the government are also eligible. If the request comes from a District Council, the council should be prepared to document its CAMPFIRE policies and how it actually shares natural resource revenue with producer villages and wards, as prescribed by the CAMPFIRE philosophy.

WHAT KIND OF PROJECTS OR ACTIVITIES CAN BE FUNDED?

The idea must concern community-based management of natural resources (wildlife, trees, soil, grass, fish, water, wild-fruit, scenic landscapes, etc.) in the widest sense of the term. Social welfare projects are not eligible.

The ideas should in some way reflect the basic CAMPFIRE principles:.

The idea must have the support of residents in the area where the project is to occur and the nature of this support should be explained and documented when submitting the initial idea.

Micro-credit and savings projects linked to community based resource management are also eligible.

WHAT CANNOT BE FUNDED?

Grants cannot be used to pay for salaries, cars, buildings, international travel, or capital investments and equipment greater in value than $US 5,000 per year.

Grants that are purely charitable in nature will not be funded.

Projects and programmes that do not have meaningful co-contributions from the affected community will not be funded.

HOW TO APPLY?

Written project ideas of 3-5 pages plus a one page cost estimate should be submitted by X date. Each submission must be accompanied by a letter of support from the head of the organization submitting the request along with a copy of the organization's constitution, by-laws, list of Board members, list of staff members, and registration number (where relevant). Send idea packages to X or to your local CAMPFIRE Coordinator in your District Council who will forward them to the IC or its replacement who is managing the competition.

WHO WILL JUDGE THE COMPETITION?

Development Associates, on behalf of USAID, is organizing the competitions and will pre-screen idea packages based on eligibility criteria as listed above.

A locally-based international, volunteer panel of jurors will select the winning proposals. The panel will be composed of seven senior professionals with experience in community-based natural resource management and knowledgeable about the CAMPFIRE philosophy. Jurors will change each year and will be selected from the donor, research, university, government, private sector, NGO, and CBO community. Jurors from organizations submitting ideas for the competition will not be allowed to comment on or discuss proposal ideas originating from their organization and will be asked to leave the room while that idea is being reviewed.

Jurors rankings and comments on the submitted ideas will be written down and the IC will provide summaries of these comments to the organizations submitting proposal ideas when announcing the results of the competition. Winning organizations should be prepared to have their organization and a synopsis of their idea listed in the national papers.

WHAT CRITERIA WILL THE JURORS USE TO RANK IDEAS?

In the first stage, winners will be judged on:

Pertinence of the idea to community-based natural resource management and the CAMPFIRE philosophy (maximum 10 points).

Likelihood and overall promise of success (maximum 10 points)

Clarity of purpose(s) (maximum 10 points)

Evidence of community support for the idea and for the organization(s) submitting the idea (maximum 10 points).

Evidence of clear thinking about how the activity will be sustainable in the long-run when the grant money runs out (maximum 10 points)

Originality of the idea (maximum 10 points)

Degree to which the idea reflects collaboration and a spirit of partnership among two or more organizations working together on the idea (maximum 10 points)

Geographical specificity of the zone of activity (maximum 10 points)

In the second stage, winners will be reviewed on realism of the budget and workplan they submit, ability to manage the grant money, and capacity to carry out the fully developed idea.

FOR MORE INFORMATION OR TO ASK QUESTIONS:

Call DA, or see your CAMPFIRE Coordinator who has information available.

C. Potential Modalities of Operation

To set this up for the longer term, USAID should reallocate remaining available project funds to a *trust instrument* in the US (an unexplored option would be to do so in the UK where trust law is equally developed). The trust instrument would have a small US board of trustees -- 2 to 3 people serving pro bono with only cost reimbursement. The trustees would be charged with oversight of the financial investment and assuring annual transfer of the grant budget to the selected Zimbabwean local organization. Annual transfer is usually made in the trust contract contingent upon receipt of an unqualified international quality audit and the local partner=s use of internationally acceptable accounting practices.

It may be possible for someone from USAID-Washington to serve as one of the official trustees. This is desirable, for in such situations USAID is required to report annually on the use of the

funds for five to ten years after the creation of the trust instrument. Typical trust clauses would make the trust revocable over a certain time period so that if USAID decided abuse of the trust was a problem, they could revoke the instrument. Also if desired, a Zimbabwean of international reputation with US residency could be invited to serve as a voluntary trustee. In any case, the capital would be invested in a mix of stocks, bonds and treasury bills, according to professional advice. The management fee should not exceed 1% of capital per year. Prudent investment of the capital typically yields 7% a year over the long-run, although slightly more aggressive investments can yield more. At the beginning of each fiscal year, the trustees would draw out a fixed sum and transfer it to a Zimbabwean grant-making organization that agrees to open a A CAMPFIRE funding window. This organization would account for its use with fund-accounting software (such as the one sold by Sunsystems which is rapidly becoming a world standard for this kind of need).

A viable option worth exploring is to set up a local charitable organization that is allowed, under local law, to receive an annual gift from abroad and undertake grant-making activities. Another possibility is to identify an existing local or international organization. Examples might be the Beit Trust, the Oak Foundation, or some other local non-profit. Even a US organization operating in Harare such as the Kellogg Foundation might agree to open a sub-account for the fund and house one or two staff members dedicated to the fund. It would be important that the intermediary be based in Zimbabwe in order to simplify grant monitoring. A regional-based intermediary outside Harare would not be useful.

Identifying such an intermediary might take some time and careful thought. Existing organizations, be they international organizations operating in the country, large support NGOs, or small-scale donors, are all wary of USAID. Their wariness arises from concern that USAID would impose unreasonable reporting requirements (more than annual and more detailed than required under GAAP). Some might also be concerned over possible loss of organizational identify were they to serve as a pass-through for USAID funds. This is not to say that a local organization might not be found who is willing to be a grant-making intermediary, but USAID would need to approach them gently and diplomatically. It would be important to provide them with assurance of the appropriate scale of USAID=s intentions. They might also need assurance that USAID does not intend to micro-manage grant-making and that only a funding window is under consideration, not wholesale transformation of an existing organization=s character.

Assume that US$ 4.16 million is left available and put into a sinking fund, from which a fixed amount is transferred to Zimbabwe. Let that amount be US$ 500,000 a year (an appropriate amount for modest annual grant-making with the present low-value of the Zimbabwe dollar). Under present projections of capital availability (see attached spreadsheet), a sinking fund at that level of capital would close down after 11 years of operation. If the local intermediary organization used 15% of the funds for their own auditing costs and for the costs of employing a ACAMPFIRE Grant-maker and those of a financial monitoring assistant, about US$ 425,000 a year would be available for CAMPFIRE-related grants. At present, the soft costs of a typical grant (training, meetings, minor equipment, etc) rarely amount to more than US$15,000 a year, so it is possible to make some 20 grants a year on a competitive basis. Larger, multi-year grants

might also be encouraged under this scenario. If investment returns are exceptional, the annual grant budget might also be increased. If minor capital and small infrastructure increased the size of grants, a smaller number of grants could be made.

The transactions cost of developing grants should be reduced and fairness enhanced by avoiding the program officer mode of grant-making common to US foundations. Rather the fund should adopt the grant competition model using rotating panels of jurors to select among proposals. Competition is by far the best practice in grant-making.

Regardless of the intermediary chosen (new or existing), the selected organization would be required to produce annual audited financial statements to the US-based trustees of the trust instrument and take minimum precautions to assure that all grants would be for scientific, educational or charitable purposes.

D. Observations Pertaining to CDF Operation

- The purpose of allocating grant funds on a competitive basis is to establish the true absorptive capacity of the many and varied organization's seeking to work with CAMPFIRE villages and wards. It also ensures that this absorptive capacity is not exceeded. The competitive approach relieves IC of the responsibility of proposal development and allows many other actors to contribute their ideas and time to proposal development.

- All proposal ideas over US$ 5,000 should be submitted by eligible organizations at least one month before the bi-annual meeting of the jury. However, the jury should give sufficient commentary on rejected proposals so that applicants are free to improve their proposal ideas and resubmit in the next competition.

- IC's grant officer might also facilitate quarterly "proposal writing and development" workshops in different regions over a two-three day period. Interested participants can be invited to work on their project ideas and complete proposals during the workshop. CA or CCG staff might participate in the training to complement the proposal writing skills with technical knowledge and support. These would be low-key, voluntary workshops that do not pay for the transport, accommodations and per diem of participants.

- Twenty-five percent of the CDF might also be allocated for small "proposal development grants" using a quick-release mechanism (perhaps in the form of consulting contracts with two people at IC signing off to indicate approval). Such grants should not exceed $5000 each and might often be directly managed by IC as it would a consulting contract. Their purpose would be to allow eligible groups to hold workshops, hire facilitators, collect data relevant to the preparation of a project, conduct baseline and planning PRAs, and contract specialists for feasibility studies. IC would not actually carry out the work; each recipient would use those resources it judged most appropriate and would most likely team with a CCG partner (including the CA itself).

- IC accounting staff should make an informed request to USAID about reduction of the depth and level of pre-award survey requirements for small grants below $20,000. This request should include suggestions for how to simplify the accounting and reporting burden on grantees for these small grants, while still maintaining acceptable levels of accountability.

- Approved grants should be made under a partial advance system, in which a percentage of approved grant funds are passed to the grantee after signature of the grant contract. The rest can be given on a schedule left to the discretion of the grant officer. Staff of the grant management unit would need to make a number of visits to grantees: a pre-grant visit, a mid-grant monitoring visit, and a grant-completion visit.

- Projects would be submitted directly to IC under this scenario. The role of IC would be to build and train an internal, autonomous grant management team that would be transferred to an independent, third-party, local organization at the end of NRMP II and funded under the sinking fund concept.

- An alternative that would allow ample time for good projects to gestate would be to start planning now to reserve the unobligated funds in NRMP II as of September 30, 1999 as a CAMPFIRE Development Trust. In principle, the trust would be set up to be liquidated over a period of, say, 10 years. The funds would be used to support the process of project development at the community/village/ward level and to provide the communities with modest amounts of equity finance to give them a real stake in their CAMPFIRE development projects, not only as decision makers but also as investors. The balance of project finance could come from joint venture partners and/or lines of credit. The only restrictions on the projects would be that they would be for development of communal areas "indigenous resources." There would be costs of community facilitation which could be borne by the trust. One possibility would be for communities to know at the outset that a what their share of the trust would be over a set period of time so that they would not be playing with unreal money and would begin to realize the opportunity costs of their choices. Competition would be directed within a set aside and not against other areas or against time.

- The key financial (as opposed to economic, technical, environmental and C/F principles criteria) criteria for approval of a project would be (1) that the community, after a sufficiently thorough review process, were willing to invest their equity in the project and, if this were insufficient, (2) that a joint venture partner and/or a lending institution would be willing to invest or lend to the project. There would be no prohibition against other donors increasing the community's equity in the project.

- Use restructuring of the CDF infrastructural support as part of the rationale for extending the project beyond its current PACD.

Gwanda District reports that " Six wards in Gwanda have earned a total which is 50% of the CAMPFIRE proceeds from sport hunting". A District report shows ward allocations of Z$ 104,858 for 1996, Z$18,742 for 1997, and Z$ 123,356 for 1998 (of which only Z$ 81,938 had actually been spent). Dividend payments are usually made in February following the year the income is earned. So 50% of the 1998 figure here represents the allocation from sport hunting in 1997. The 6 wards deposit their allocated dividend funds into their own bank account until they can decide as a group how they want to spend the money. This took a full year for decisions to be made, after much internal disagreement. The RDC did not get in the middle of these discussions. Gwanda revenues are nowhere near enough for sustainably employing the CAMPFIRE coordinator and 6 game scouts currently being paid for by USAID (Z$ 208,000), though this district has put in Z$162,900!

2 • In Hurungwe, dividends are split 50% for ward level producer communities at the village level, 35% for ward level wildlife management control, and 15% for District overhead needs. Local community members in the six district CAMPFIRE wards agreed to use their CAMPFIRE 50% dividends for a CAMPFIRE Tractor Program, to purchase equipment to use in small dam construction and erosion controlling contour riding in major maize fields. In 1996, two tractors, one reversible plough, and two dam scoops were purchased. In 1997, two more tractors, reversible ploughs, dam scoops, and one tow grader were purchased. The tractors have also been sent around to all the CAMPFIRE wards to support whatever communities felt

1 In Hurungwe, dividends are split 50% for ward level producer communities at the village level, 35% for ward level wildlife management control, and 15% for District overhead needs. Local community members in the six district CAMPFIRE wards agreed to use their CAMPFIRE 50% dividends for a CAMPFIRE Tractor Program, to purchase equipment to use in small dam construction and erosion controlling contour riding in major maize fields. In 1996, two tractors, one reversible plough, and two dam scoops were purchased. In 1997, two more tractors, reversible ploughs, dam scoops, and one tow grader were purchased. The tractors have also been sent around to all the CAMPFIRE wards to support whatever communities felt needed to be done. In Nyamakate ward, contour construction, and repairing of the Huyo farm to market road was completed; in Chundu, the Mayamaba road was repaired and hauling of bricks, river and pit sand for the Karuru health clinic done; in Kazangarare ward, two farm to market dirt roads were repaired, and stones were transported for the Dete dip tank; and in Chidamyoyo and Rengwe wards, a road to Badze school and Point 4 roads were repaired. Other projects underway or completed include: construction of Chipfuko primary school and Nyamakata secondary school, construction of a waiting mother's shelter at Chundu clinic and four blair toilets, a classroom block at Kabidza and Mahwua primary construction of dip tanks in Rengwe and Kazangarare wards, with construction of a weir dam in Rengwe ward in progress. All these, and other projects were of general benefit to the ward populations and would have been left un-done without this CAMPFIRE revenue. They have provided important employment possibilities for many local residents as well, money which will further stimulate the local economy.

APPENDIX H

CAMPFIRE ASSOCIATION META-ANALYSIS OF PERFORMANCE

Campfire Association Work Plan Performance Analysis: Meta-Analysis of Documents and Other Data Sources							
Work Plan Project Outputs (1-8)	**ULG Midterm Evaluation January 1994**	**Price Waterhouse, Pre-Award Assessment June 1996**	**Garcia, Huchu: Evaluation February 1997**	**NRMP II Annual Planning Workshop August 1997**	**Garcia: Evaluation September 1997**	**Field Observations**	**Comments from Interviews, Other Sources**
1. Policy Related to CA-NRM issues formulated, implemented and monitored.			Scheduled meetings held; minutes produced but need more timely distribution; CITES position paper prepared. RDC feedback that CA policy guidance inadequate or non-existent due to poor communication or mis-interpretation.		In general, CA is progressing well in accomplishing its tasks and activities contained in its annual work plan; improvement in meeting agenda and minutes distribution, but of poor quality. Some improvement in policy guidance, but RDC still concerned about lack of CA/CCG communication on policy matters.	RDC's want more action on policy matters, such as extending appropriate authority status to other resources, such as forestry, minerals, etc.	CA lacks a clear policy agenda and a plan to implement it. Policy viewed as "vacuum" in the project. PET policy sub-committee held first meeting in early March 1998, and developed agenda of "issues" but action on them just getting underway.

Campfire Association Work Plan Performance Analysis: Meta-Analysis of Documents and Other Data Sources							
Work Plan Project Outputs (1-8)	**ULG Midterm Evaluation January 1994**	**Price Waterhouse, Pre-Award Assessment June 1996**	**Garcia, Huchu: Evaluation February 1997**	**NRMP II Annual Planning Workshop August 1997**	**Garcia: Evaluation September 1997**	**Field Observations**	**Comments from Interviews, Other Sources**
2. Project Management, implementation, coordination, and monitoring established, including logistical support for the decentralization of the CAMPFIRE Association.		Funds properly accounted for and USAID procurement procedures followed (with considerable DA assistance to CA). At present, CA does not by itself have the financial management capacity to manage the magnitude of funds under this project.	"CA progress... under this output has been excellent" Improvement needed in quarterly review reports, financial reporting accuracy, and RDC travel reimbursement.	CCG member services are poorly coordinated at the RDC and producer community level; CCG members tend to have a paternalistic view/attitude of RDCs;RDCs do not feel they own the project because CCG agency officers go to districts with their own ideas, and sometimes local authorities and the communities are not consulted.	Progress in this area has been very good. CA staffing completed; positive review of CA grant management; progress reports still late; financial management control and reporting system is working satisfactorily. RDCs are still not informed on a timely basis.	CA lacks the capacity to provide on-the-ground services to RDCs	CA does not represent the interests of the RDC; it represents of the NGOs in the CCG (Min. Local Gov't) RDC very critical of CA re: poor communication

Campfire Association Work Plan Performance Analysis: Meta-Analysis of Documents and Other Data Sources							
Work Plan Project Outputs (1-8)	**ULG Midterm Evaluation January 1994**	**Price Waterhouse, Pre-Award Assessment June 1996**	**Garcia, Huchu: Evaluation February 1997**	**NRMP II Annual Planning Workshop August 1997**	**Garcia: Evaluation September 1997**	**Field Observations**	**Comments from Interviews, Other Sources**
3.A. Effective CA Advocacy locally and inter-nationally.			Publications behind schedule; behind on public relations strategy development; behind on visitor strategy development.		Publications still lag behind schedule; Publications relations strategy still behind schedule; visitor strategy still behind schedule.		
3.B. Effective information development and dissemination.	RDCs feel they're not receiving adequate CITES information, yet they could play more active role.			Some RDCs are not even aware of agencies such as ART; research outputs from CASS and WWF do not filter down to RDCs.	RDCs feel they are not receiving adequate information on NRMP activities; they feel they should have more a active role in CA activities. Little progress in establishing routine communication system of communication with the Board of Management and the Association membership.	CAMPFIRE dispersal across Zimbabwe's vast geography, and the time involved in traveling to remote communal areas, makes essential direct CA communication with RDCs and communities very difficult and problematic.	

Campfire Association Work Plan Performance Analysis: Meta-Analysis of Documents and Other Data Sources							
Work Plan Project Outputs (1-8)	**ULG Midterm Evaluation January 1994**	**Price Waterhouse, Pre-Award Assessment June 1996**	**Garcia, Huchu: Evaluation February 1997**	**NRMP II Annual Planning Workshop August 1997**	**Garcia: Evaluation September 1997**	**Field Observations**	**Comments from Interviews, Other Sources**
4. CA staff trained in financial, procurement and project management			Draft training needs assessment completed; training underway; formal on the job training (OJT) program development behind schedule.		Staff development not fully institutionalized; CA Formal OJT program still not developed; informal OJT is continuing; training in management and leadership techniques needs improving, has not been instituted fully.		

Campfire Association Work Plan Performance Analysis: Meta-Analysis of Documents and Other Data Sources							
Work Plan Project Outputs (1-8)	**ULG Midterm Evaluation January 1994**	**Price Waterhouse, Pre-Award Assessment June 1996**	**Garcia, Huchu: Evaluation February 1997**	**NRMP II Annual Planning Workshop August 1997**	**Garcia: Evaluation September 1997**	**Field Observations**	**Comments from Interviews, Other Sources**
5.Assist RDCs to develop capacity to market and promote CB natural resource utilization projects			WWF, CASS tasked by PET to conduct eco-tourism study; CA, Zimtrust and ART exploring marketing strategies. Some indigenous resources identified.	RDCs and the communities they represent are not included in important activities, such as attending international symposia and meetings.	WWF, CASS tasked by PET to conduct eco-tourism study; CA, Zimtrust and ART exploring marketing strategies; Some indigenous resources identified; however, no real progress achieved - not much accomplished.		

Campfire Association Work Plan Performance Analysis: Meta-Analysis of Documents and Other Data Sources							
Work Plan Project Outputs (1-8)	**ULG Midterm Evaluation January 1994**	**Price Waterhouse, Pre-Award Assessment June 1996**	**Garcia, Huchu: Evaluation February 1997**	**NRMP II Annual Planning Workshop August 1997**	**Garcia: Evaluation September 1997**	**Field Observations**	**Comments from Interviews, Other Sources**
6. RDC proposals screened by PET, projects approved, and assistance provided by the IC and CCG agencies			Planned progress achieved; Accelerate timely screening of RDC projects and feedback to RDCs on process		The system for screening and review of RDC projects is working well; need to accelerate timely screening of RDC projects and feedback to RDCs on process; CA staffing is inadequate to complete pre-award surveys and monitoring visits.		

Campfire Association Work Plan Performance Analysis: Meta-Analysis of Documents and Other Data Sources							
Work Plan Project Outputs (1-8)	**ULG Midterm Evaluation January 1994**	**Price Waterhouse, Pre-Award Assessment June 1996**	**Garcia, Huchu: Evaluation February 1997**	**NRMP II Annual Planning Workshop August 1997**	**Garcia: Evaluation September 1997**	**Field Observations**	**Comments from Interviews, Other Sources**
7. Increased revenues from its constituent base and more diversified donor base to ensure CA financial sustainability			Price Waterhouse to prepare preliminary strategy; no structured plan for development of alternative sources of revenue; no annual business plan developed		CA management is beginning the process to develop and implement innovative strategies that will ensure its financial future; however, it lacks a viable plan for increasing membership, a structured plan for development of alternative sources of revenue or an annual business plan developed; the Association cannot depend solely on dues from its membership and an occasional external donor for financial support.		CA lacks a firm strategy or plan for building future financial sustainability. Discussions with CA management reveal disparate ideas lacking a coherent action plan. No direct evidence, other than the Price Waterhouse study, of action in this area.

Campfire Association Work Plan Performance Analysis: Meta-Analysis of Documents and Other Data Sources							
Work Plan Project Outputs (1-8)	**ULG Midterm Evaluation January 1994**	**Price Waterhouse, Pre-Award Assessment June 1996**	**Garcia, Huchu: Evaluation February 1997**	**NRMP II Annual Planning Workshop August 1997**	**Garcia: Evaluation September 1997**	**Field Observations**	**Comments from Interviews, Other Sources**
8. Engage in research, monitoring and evaluation activities pertinent to RDC and CCG activities.			M&E workshop for RDCs conducted	RDCs should be involved in the evaluation of CCG services to RDCs and the producer communities.	Little progress in PET or RDC identification of research projects; M&E workshop for RDCs conducted; CA/CCG/RDC workshop to develop M&E, sub-committee formed to follow-up.	Four evaluations of CDF projects are of variable quality with very little data or analysis. Essentially "thin" discussions of impressions.	Poor coordination of M&E within CAMPFIRE; multiple data collection activities with little coordination to avoid duplication and ensure data quality.

APPENDIX I

EXAMPLES OF CAMPFIRE M&E FORMS

1. POMS Bi-Annual Survey Sheets
2. CA Customer Service Plan
3. PAC Reporting Forms
4. CA Hunt Return Form
5. Revised DNPWLM Hunt Forms

POMS BI-ANNUAL SURVEY SHEETS FOR WARD CAMPFIRE COMMITTEES

NAME OF WCC	WCC ID	DISTRICT	DISTRICT ID	AGE OF WCC

NO. OF CONTACTS IN MONITORING PERIOD		MONITORING PERIOD		AREA MANAGER

A. PROCEDURAL FUNCTIONING OF WARD CAMPFIRE COMMITTEES

A.1

Constitution & bylaws in place	----3------2------1------0-------	Constitution & bylaws not in place

A.2

Committee meetings held according to bylaw requirements	----3------2------1------0-------	Committee meetings not held & bylaws non-existent

A.3

General meetings held regularly	----3------2------1------0-------	General meetings not held

A.4

Meetings held according to proper agenda & minuting procedures	----3------2------1------0-------	Agenda & minuting procedure not followed

A.5

Financial management & reporting procedures followed	----3------2------1------0-------	Financial & reporting procedures not followed

A.6

Budgeting procedures followed	----3------2------1------0-------	Budgeting procedures not followed

A.7 NARRATIVE SUMMARY OF WARD COMMITTEE FUNCTIONING

B. QUALITY OF WARD CAMPFIRE LEADERSHIP

B.1

Recognition & acceptance of leaders by community members	-----3-------2-------1-------0----------	Leaders not accepted by community members

B.2

Creativity of WCC management	-----3-------2-------1-------0----------	Lack of creative WCC management

B.3

WCC able to communicate with supporting officials , agencies & community in general	-----3--------2-------1-------0----------	WCC unable to communicate with supporting officials, agencies & community in general

B.4

WCC willing to learn	-----3-------2-------1-------0----------	WCC unwilling to learn

B.5

WCC has capacity to resolve local level conflicts, listen to community & accept differing views	------3-------2-------1--------0---------	WCC not able to resolve local level conflicts, listen to community & accept differing views

B.6

WCC committed to Campfire & can promote awareness	------3-------2-------1--------0--------	WCC not committed to Campfire & cannot promote awareness

B.7 NARRATIVE SUMMARY OF QUALITY OF WARD CAMPFIRE LEADERSHIP

C. PRODUCER COMMUNITY PARTICIPATION

C.1

CAMPFIRE awareness & support within the community	-----3------2------1------0---------	Lack of CAMPFIRE awareness & support in community

C.2

Accountability of WCC to community. Community demand WCC accountability.	-----3------2------1------0---------	Lack of accountability of WCC to community. Community cannot demand WCC accountability.

C.3

Much community involvement in the decision making process	-----3------2------1------0---------	Much community involvement in the decision making process

C.4 NARRATIVE SUMMARY OF PRODUCER COMMUNITY PARTICIPATION

D. ROLE OF CAMPFIRE INSTITUTIONS & LINKAGE WITH SUPPORTING AGENCIES & DEVELOPMENT STRUCTURES

D.1

Active support of traditional leaders & extension workers in Campfire activities	-----3-------2-------1-------0----------	Lack of active support of traditional leaders & extension workers in Campfire activities.

D.2

Needs of women & children addressed by WCC management	-----3-------2-------1-------0----------	Needs of women & children not addressed by WCC management

D.3

WCC encouraged to consider full range of resources	-----3-------2-------1-------0----------	WCC not encouraged to consider full range of resources

D.4

WCC accountable to the community	-----3-------2-------1-------0----------	WCC not accountable to the community

D.5

WCC supported by WADCO/RDC in developing revenue utilisation proposals	------3-------2-------1--------0---------	WCC not supported by WADCO/ RDC in developing revenue utilisation proposals

D.6

Good collaboration between WCC & extension agencies, safari operators, NGOs, CCG members	------3-------2-------1--------0---------	Poor collaboration between WCC & extension agencies, safari operators, NGOs, CCG members

D.7 NARRATIVE SUMMARY OF ROLE OF CAMPFIRE INSTITUTIONS & LINKAGE WITH SUPPORTING AGENCIES & DEVELOPMENT STRUCTURES

E. DEVELOPING & IMPLEMENTING NATURAL RESOURCE MANAGEMENT (NRM) PLANS & PROJECTS, & INVOLVING CAMPFIRE WORKERS

E.1		
Good community involvement in developing NRM plans	-----3-------2-------1-------0----------	Poor community involvement in developing NRM plans
E.2		
WWC able to source technical assistance when necessary	-----3-------2-------1-------0----------	WWC unable to source technical assistance when necessary
E.3		
WCC able to monitor community resource off-take	-----3-------2-------1-------0----------	WCC unable to monitor community resource off-take
E.4		
PAC strategy developed & implemented	-----3-------2-------1-------0----------	PAC strategy not developed nor implemented
E.5		
Community decides revenue distribution. Direct & indirect benefits accrue to community	------3-------2-------1-------0---------	Community does not decides revenue distribution. Benefit stream distorted.
E.6		
Community prioritises, chooses, implements, supervises & maintains own projects	------3-------2-------1-------0--------	Community does not prioritise, choose, implement, supervise or maintain own projects
E.7		
Community Campfire Worker role & supervision clear with community & RDC.	------3-------2-------1-------0--------	Community Campfire Worker role & supervision not clear with community & RDC.
E.8		
CCW trained for role	-----3-------2-------1-------0----------	CCW not trained for role

E.9 NARRATIVE SUMMARY OF DEVELOPMENT & IMPLEMENTATION OF NRM PLANS & PROJECTS & ROLE OF CCW WORKERS.

POMS BI-ANNUAL SURVEY SHEETS FOR WARD/VILLAGE CAMPFIRE COMMITTEES

NAME OF WCC	WCC ID	DISTRICT	DISTRICT ID	AGE OF WCC	AREA MANAGER	NO. OF CONTACTS IN MONITORING PERIOD	MONITORING PERIOD

CATEGORY A:. PROCEDURAL FUNCTIONING OF WARD CAMPFIRE COMMITTEES

Indicator A1: WCC / VCC Constitution

1	*Committee constitution not developed*
2	*Committee constitution in existence but, not documented (orally agreed on)*
3	*Draft committee constitution developed*
4	*final draft produced but not yet adopted by general community*
5	*Committee constitution in place, adopted by general community and documented*

Indicator A2: Ward/Village Campfire Committee Meetings

1	*No meetings held*
2	*Meetings held because of external pressures (i.e from RDC, Laws), orally agreed meeting schedule, capitalise on other meetings*
3	*Meetings held according to draft constitution to address burning issues or through individual committee member initiatives*
4	*Meetings held but partially follow constitution*
5	*Meetings held according to constitutional requirements*

Indicator A3: General Community Meetings

1	*No general community meetings called by WCC although community asked for general meetings*
2	*General community meetings held and called by WCC in response to external insistence*
3	*General community meetings held and called by WCC without a constitution or its draft*
4	*General community meetings held in partial conformity to constitutional requirements*
5	*General meetings held and called by WCC according to constitutional requirements*

Indicator A4: Agenda for Committee Meetings

1	*No agenda is set for Committee meetings*
2	*Agenda set informally by some committee members and not circulated*
3	*Agenda set in the meeting*
4	*Agenda set, circulated in advance but not adhered to*
5	*Agenda set in consultation with members, circulated in advance and is adhered to*

Comments:

POMS BI-ANNUAL SURVEY SHEETS FOR WARD/VILLAGE CAMPFIRE COMMITTEES

Indicator A5: Agenda for General Community Meetings

1	*No agenda is set for general community meetings*
2	*Agenda set informally by some committee members and not circulated*
3	*Agenda set in the general meeting*
4	*Agenda set, advertised in advance but not adhered to*
5	*Agenda set, advertised in advance and adhered to*

Indicator A6: Committee Meeting Minutes[1]

1	*No Committee meeting minutes taken or recorded*
2	*Committee meeting minutes not well recorded and WCC/VCC rely on memory*
3	*Committee meeting minutes recorded but not referred to*
4	*Committee meeting minutes well recorded, well kept and but follow-up on issues is weak*
5	*Committee meeting minutes well recorded, well kept and issues followed up*

Indicator A7: Financial Recording

1	*No financial records (cash book, receipt book, payment vouchers, invoices & any relevant records of expenditure and income transactions) kept.*
2	*Income and expenditure transactions are haphazardly recorded*
3	*WCC keeps all source documents (Receipts, Payment vouchers, Invoices) but do not maintain a Cash-book*
4	*WCC is able to keep and maintain Cash-book and other source documents*
5	*Cash book & Asset register maintained, and able to produce a simple Income and expenditure statement*

Indicator A8: Financial Reporting

1	*WCC does not inform wider community on all financial matters*
2	*WCC presents a fragmented financial report in response to external Influence*
3	*WCC presents financial reports that have missing information (incomplete)*
4	*WCC presents delayed but comprehensive financial reports*
5	*General communities are informed of all financial matters in every general meeting as per constitutional requirements (income and expenditure statement)*

Comments:

[1] Well recorded minutes are those which capture all resolutions and follow up action

POMS BI-ANNUAL SURVEY SHEETS FOR WARD/VILLAGE CAMPFIRE COMMITTEES

CATEGORY B: QUALITY OF WARD/VILLAGE CAMPFIRE COMMITTEES

Indicator B1: Implementation of Community Projects

1	*No Community projects (income generating/social infrastructure) identified*
2	*Community projects identified but not implemented*
3	*Community projects implemented as a result of external influence*
4	*Community projects implemented through initiatives of a few committee members*
5	*All planned community projects implemented and well managed*

Indicator B2: Decision Making Process[2]

1	*WCC/VCC makes all the decisions (dictates)*
2	*WCC/VCC makes all decisions as a result of non participation of communities in the process*
3	*WCC/VCC makes all decisions because of low community participation*
4	*Community entrusts WCC/VCC to make decisions*
5	*Consensus on major decisions made at general community meetings*

Indicator B3: WCC ability to Secure Technical Services

1	*WCC/VCC has not identified and sourced any technical assistance*
2	*WCC/VCC has identified available technical assistance but have not yet secured them*
3	*WCC/VCC has been able to secure technical assistance from local agencies they are currently working with*
4	*WCC/VCC has been able to secure external technical assistance (e.g. RDC, CCG etc.)*
5	*WCC/VCC has identified and secured government and NGO services (e.g. training)*

Indicator B2: Decision Making Process[3]

1	*WCC/VCC makes all the decisions (dictates)*
2	*WCC/VCC makes all decisions as a result of non-participation of communities in the process*
3	*WCC/VCC makes all decisions because of low community participation*
4	*Community entrusts WCC/VCC to make decisions*
5	*Consensus on major decisions made at general community meetings*

Comments:

[2] Minutes can be used for verification

[3] Minutes can be used for verification

POMS BI-ANNUAL SURVEY SHEETS FOR WARD/VILLAGE CAMPFIRE COMMITTEES

CATEGORY C - COMMUNITY PARTICIPATION

Indicator C1: Attendance and Contributions at Meetings

1	*Communities do not attend general community meetings (WCC only attends)*
2	*Communities only attend when there is outside influence*
3	*Communities only attend when there are issues of interest*
4	*Communities attend but do not make meaningful contributions*
5	*Communities voluntarily attend meetings and contribute meaningfully to discussions*

Indicator C2: Participation of Traditional Leaders

1	*Traditional leaders do not attend meetings and Campfire related activities*
2	*Traditional leaders attend Campfire related activities in response to external insistence (of WCCs, NGOs, Govt e/ws or general community members)*
3	*Traditional leaders accept the Campfire Programme but take part as ordinary community members*
4	*Traditional leaders act as advisors to the Campfire Programme*
5	*Traditional leaders support the Campfire programme, attend meetings, contribute, advises on traditional issues and raise awareness in Campfire related activities*

Indicator C3: Project Identification and implementation

1	*Community do not realise the importance of projects & do not participate in project identification & prioritisation*
2	*Community not involved in project identification (Process done by WCC/VCC or Councillor*
3	*Community involved in project identification due to external pressures*
4	*Community identifies and prioritises but do not participate in implementation*
5	*Community identifies, prioritises and participates in the implementation of community projects*

Indicator C4: Women Participation (Gender Sensitivity)

1	*No women in WCC /VCC*
2	*Women represented in WCC due to external pressure (e.g. Donor requirements)*
3	*Women represented in WCC but restricted to few decision making areas*
4	*Women represented in WCC but do not have decision making capacity ????*
5	*Women equitably represented in decision making bodies (WCC)*

Comments:

POMS BI-ANNUAL SURVEY SHEETS FOR WARD/VILLAGE CAMPFIRE COMMITTEES

CATEGORY D - NATURAL RESOURCES MANAGEMENT

Indicator D1: Inventory of available Natural Resources

1	*No inventory of natural resources undertaken*
2	*Oral inventory is in place and the community is aware of the value of resources*
3	*Communities identified available resources but have not documented the available natural resources*
4	*Communities have identified and documented few major natural resources*
5	*Inventory of all potential natural resources for utilisation undertaken and documented*

Indicator D2: Zoning / Simple Landuse Plans

1	*Awareness on LUP non-existent*
2	*Awareness on LUP exists*
3	*Community appreciates and accepts the concept of LUP*
4	*Community has produced simple LUP and is prepared to implement it.*
5	*Community has produced simple LUP, and has implemented it*

Indicator D3: Natural Resources Management by-laws

1	*No natural resources management by laws developed.*
2	*Natural resources management by-laws in the process of being discussed with communities but draft not yet documented*
3	*Draft natural resources management by-laws in place but not yet adopted by Council*
4	*Draft natural resources management by-laws in place and adopted by RDC*
5	*Natural resources management by-laws approved and gazetted by local government and being implemented by RDC and community*

Indicator D4: Natural Resource Utilisation (resource off-take)[4]

1	*No Resource monitoring system in place*
2	*Resource Monitoring system at developmental stage*
3	*Resource monitoring system in place but not functional*
4	*Resource monitoring system functional but results not used*
5	*Resource monitoring system functional and results informs decision-making*

Comments:

[4] Respondents may be asked to explain types of resources monitored

POMS BI-ANNUAL SURVEY SHEETS FOR WARD/VILLAGE CAMPFIRE COMMITTEES

Indicator D5: PAC Reporting System (Where applicable)

1	*No mechanism of PAC reporting in place*
2	*PAC reporting system at development stage (not documented)*
3	*PAC reporting system developed but not functional*
4	*PAC reporting system functional but does not inform PAC reaction strategy*
5	*PAC reporting system functional and informs PAC reaction strategy*

Indicator D6: Community Investment in Natural Resources management

1	*No investments by communities in the natural resource base (e.g. Water provision, fire control, gully reclamation, etc.)*
2	*Communities rely on external support*
3	*Communities prepared to contribute e.g. in form of labour*
4	*Communities are investing in form of labour and have plans to invest capital in the natural resource base*
5	*Communities injecting capital investments into Natural Resources Management*

Comments:

Overall Comments:

GOKWE DISTRICT

PROBLEM ANIMAL REPORT ..... PAR FI .. NO: .....

Date of complaint: ..... Ward

Date of incident: ..... Name of PAR: .....

Locality (village): ..... Complainant: .....

Nature of Problem (tick where appropriate): Grid Ref. (6 figures) .....

- ☐ Crop Damage
- ☐ Livestock maimed or killed
- ☐ Damage to property, e.g. grain bins
- ☐ Threat to human life
- ☐ Other (Specify)

Wildlife responsible (tick):	Numbers involved:	Sex:
☐ Elephant	☐	☐
☐ Buffalo	☐	☐
☐ Lion	☐	☐
☐ Baboons	☐	☐
☐ Other (Specify)	☐	☐

Type of crop damaged (tick):	How good was the crop before damage occurred (tick): Good	Medium	Poor	Age of Crop (tick S for Seedling, I for intermediate or M for Mature): S	I	M
☐ Maize	☐	☐	☐	☐	☐	☐
☐ Millet	☐	☐	☐	☐	☐	☐
☐ Sorghum	☐	☐	☐	☐	☐	☐
☐ Cotton	☐	☐	☐	☐	☐	☐
☐ Vegetables	☐	☐	☐	☐	☐	☐
☐ Other	☐	☐	☐	☐	☐	☐

Dimensions (paces) of total field where damage occurred:

Length: .....(paces)

Width: .....(paces)

Dimensions (paces) of actual damaged portion of field:

Length: .....(paces)

Width: .....(paces)

Other relevant details (e.g. movement or behaviour of problem animal, number of livestock killed, type of property damaged, numbers of previous reports in area etc.)

Copy to council: Yes / No Date copy sent: .....

How was the copy sent?: .....

PROBLEM ANIMAL REACTION REQUEST

PAC F1

Date of request: .....

From: Cheziya Gokwe District Council

To: National Parks, Gokwe/National Parks, Chirisa/Safari Operator **(delete inapplicable)**

Request for the above mentioned to investigate a Problem Animal Incident

at .....Ward/Video. Grid Reference .....

The Problem Animal is reported to be:
(state which animal is causing the problem and nature of problem)

This request does not necessarily require an animal to be destroyed.
Please return the PAC F1 with this request after reaction to the incident.

Stamp

.....
Signature

(Tick where appropriate)

☐ The Problem Animal Report was made on the enclosed report

☐ The Problem Animal Report was made by telephone from .....

☐ The request for Problem Animal Reaction was made by this form.

☐ The request for Problem Animal Reaction was made by telephone by .....
(Name of officer making the request)

PAC F1 and PAC F2 can be combined back to back.

PROBLEM ANIMAL CONTROL REPORT

PAC F:

Copy of PAR report received date: .....

Name of authorised control officer:.....

Position held: .....

Specify animal(s) against which action was taken:.....

Animal(s) harassed: YES\NO

Animal(s) destroyed: YES/NO If YES, how many?:.....

Total no. in herd (if applicable): ....

Locstat (o figure gird reference it possible) .....

Sex(es) of animals destroyed .....

Was animal killed instantly?: YES/NO

Was animal harassed, destroyed at damage site?: YES/NO

Method of harassment (Brief details):

Was the PAC call out justified?: YES/NO

Distance travelled by vehicle (Km) ..... Distance travelled on foot .....

No. of days and nights spent out .....

No. of rounds of ammunition expended:.....Rifle Calibre .....

Assistance received (Brief details if applicable):

lide recovered: YES/NO

'o which base?: .....No. of hides recovered .....

las hide been properly cleaned, slated and stored? YES/NO

low were the tusks disposed of? CLIENT/COUNCIL

erial no. of issue voucher if delivered to Council .....

Combined weight of tusks (Kg): .....

ny other remarks:

igned: ..... Date: .....

PAC F1 and PAC F2 can be combined back to back.

NAME OF CLIENT H. W. F. KLINGSHIEN NAME OF OPERATION HUNTERS

ADDRESS OF CLIENT PERIOD OF HUNT 29 5 96 → 01/6/96

Hawkheim, Cooe-ngay

RURAL DISTRICT COUNCIL Gunnue

Species	WARD/VICCO	Grid Ref	Date Shot	Killed/ Wounded	Trophy Size	Sex M/F	Trophy fees paid to R.D.C. -35	25
Barrow-maker								
Swamp Wallaby								
Rufous Rabbit								
Feral Pig	TTTSHWL	315	K	415		M		
Wild Dog								
Wild Horse								
Wild Cattle								
Wild Buffalo								
Wild Goat								
Fallow Deer								
Red Deer								
Sambar Deer								
Chital								
Rusa Deer								
Hog Deer								
Barking Deer								
Water Buffalo								
Fox								
Cat								
Rabbit								
Hare								
Wild Pig								
Wild Goose								
Duck								
Quail								
Pheasant								
Partridge								
Peafowl								
Guinea Fowl								
Turkey								
Chukor								
Francolin								
Spurfowl								
Pigeon/Dove								
Cockatoo								
Galah								
Lorikeet								
Parrot								
Budgerigar								
Crow								
Raven								
Magpie								
Currawong								
Kookaburra								
Sacred Kingfisher								
Starling								
Indian Myna								
Common Mynah								
Sparrow								
Finch								
Sub-TOTAL carried forward							$60	

Species	WARD/VICCO	Grid Ref	Date Shot	Killed/ Wounded	Trophy Size	Sex M/F	
OTHER (Specify)							

15. The Fourth Schedule to the principal regulations is repealed and the following is substituted—

"FOURTH SCHEDULE *(Section 60)*

PERMIT No

BOOK No

ZIMBABWE HUNT RETURN FORM (NP/CITES FORM 9).
DEPARTMENT OF NATIONAL PARKS AND WILD LIFE MANAGEMENT/RESERVE BANK OF ZIMBABWE

Operator THR number

Address ..... Phone ..... Fax .....

Professional hunter Licence

Client's surname Forenames

Passport number Country of issue

Address ..... Phone ..... Fax .....

Guests

(Continued on Page 7)

(Continued from Page 6)

N.B – SHOW ALL US DOLLARS IN WHOLE FIGURES AND EXCLUDE e.g. "US$ 000

	US$
Total daily rate	
Total guest rate	
Less commission	
Total trophy fee	
Other fees	
GRAND TOTAL	
/S	

AGENT DETAILS

Name .....

Address .....

Percentage commission charged .....

Exchange control ref. ..... where commission exceeds 7.5% .....

State currency and total amount paid by the client to the Professional Hunter or the company by whom he is employed.

(country) *(currency)*

Date	A/C NUMBER	CURRENCY	AMOUNT	FORMS No.	BANK STAMP & SIGNATURE

Balance unpaid, if any ..... *Note:* A *separate and full* written explanation must accompany each copy of this return if funds remain unpaid.)

(Continued on Page 8)

(continued from Page 7)

HUNTER

CONCESSION	START DATE	STOP DATE	DAYS

Name and address of processing agent or Taxidermist: .....

.....

Name and address of shipping agent: .....

.....

SPECIES	SEX	LOCATION					Date shot	Killed/ Wounded	TROPHY SIZE as per latest Club/International Standard	TROPHY FEES US$
		District	Concession/Farm	Ward	Village	Grid Ref				
									Total	

COMMENTS .....

I, ... hereby certify that the information given in this return is to the best of my knowledge, true and correct

IMMIGRATION CONTROL AUTHORIZATION REFERENCE (NPWCTLS FORM II) .....

Signature of foreign client ..... Date .....

Signature of Professional Hunter ..... Date .....

*for elephant give left and right measurements *

PART B
(To be completed by trophy dealer who is a taxidermist)

PRE-PROCESSING RETURN

NP9 No. _____ to which the animals listed below refer

Name of Taxidermist: .....

Address: .....

.....

Name of client: .....

Country of destination of trophies .....

Species	How to be processed

16. the Fifth Schedule to the principal regulations is amended in the heading by the deletion of "AMPHIBIA AND REPTILES" and the substitution of WILD LIFE AND TROPHY.

17. The Sixth Schedule to the principal regulations is amended by the repeal of the form titled "Trophy Dealer's Register and Return of Trophies other than Manufactured Trophies and Ivory Acquired or Manufactured" and the Substitution of the following

"TROPHY DEALER'S REGISTER AND RETURN OF TROPHIES OTHER THAN MANUFACTURED TROPHIES AND IVORY ACQUIRED OR MANUFACTURED BY HIM

PART A

Dealer's name: Registered number: Type:

Address of premises:

Licence number:

I certify that this is a true record of transactions conducted by me during the calendar month of 19

Date: Signed

Name and address of supplier	Marking on animal, if any	Description of animal	Number of animals acquired	Date of acquisition	Number of animals disposed of	Description (Species, quantity)	Name and address of supplier	Marking on animal, if any	Description of animal	Number of animals disposed of	Date of disposal	If not disposed of, how disposed of (name and address)

TAXIDERMIST POST-PROCESSING RETURN FORM NP ANNEX

NP9 No. _____ to which the animals listed below refer

Name of Taxidermist: .....

Address .....

.....

Name of client: .....

Country of destination of trophies .....

Description of animal	Weight	Quantity	Sex	Tag No.

DECLARATION OF STOCK BY IVORY MANUFACTURER

Name: ..... Licence No.: .....

Address: .....

Month: .....

WEIGHT OF IVORY IN STOCK AT BEGINNING OF THE MONTH:

	Weight of raw ivory purchased	Description of items	Quantity of items on hand at beginning of month	Weight of items on hand at beginning of month	Quantity of items produced	Quantity sold	Weight of items sold	Quantity of items on hand the last day
		Bangles						
		Necklaces						
		Carvings						
		Small items						
		Cut-off						
		Dust						
Totals								

WEIGHT OF IVORY IN STOCK AT THE END OF THE MONTH:

18. The principal regulations are amended by the insertion of the following Schedules—

"FOURTEENTH SCHEDULE (*Section 59 (4a)*)

AUTHORITY TO HUNT

Name of operator: ..... IOP No.: .....

Name of professional hunter: ..... Licence No.: .....

Name of client: .....

Country of origin: .....

Number of non-hunting clients: ..... Daily rate charged: .....

Name of property(ies)* on which hunting will take place: .....

District: .....

Duration of hunt: .....

Type of hunt (specify animal to be hunted): .....

Daily rate charged US$ .....

If a package hunt, supply the list of the animals to be hunted and the total price, and the balance of animals remaining on the quota.

*It is the onus of the hunter to ensure that the landowner has an approved quota for the offtake.

This is the actual number of hunting days.

Declaration:—

I undertake not to cause or permit the hunting of animals in excess of those indicated on this authority on this hunt.

.....

(*for or on behalf of* appropriate authority)

Animals to be hunted		Balance on Quota	Animals to be hunted		Balance on Quota

Authority granted

.....

for: *Director (NPWLM)*

Signature of Officer/Game Scout

.....

E.C. No.

TERMS AND CONDITIONS

1) The holder of this authority and any person who is specified as hunter shall comply with the requirements of the Parks and Wild Life Act and any regulations made thereunder.

2) Where any dangerous animal as defined in the Act is wounded or believed to have been wounded, a written report shall be made by the holder in person to the nearest permanent office of the Department or Police. The holder shall compile a written report in which he shall set out the full circumstances of the wounding. Such report shall indicate an accurate map reference, the date and time of wounding and direction of flight of the wounded animal. The follow-up action taken or intended to be taken by the holder must be stated. The report shall be made, handed over to National Parks or Z.R. Police within 24 hours of the wounding of the animal.

3) Where the sex of any animal has been specified on this authority, the opposite sex of the same species shall not be hunted instead.

4) No problem animal control shall be undertaken by a client.

5) The holder of an authority is required to enter the details of any animal killed or wounded on Form NP9.

6) The holder of this authority shall produce it on demand.

7) The holder shall keep this record for a three-year period.

8) This authority is not valid if not stamped by an authorized person. The authority is only valid for hunting in the inscribed area. Separate forms are to be submitted for each hunting area.

9) The Director may attach such additional terms and conditions to this authority as are deemed necessary and any such attachment shall then form part of this authority.

10) This authority is issued in terms of section 59 of the Parks and Wild Life Act [*Chapter 20:14*] and section 59 of the Parks and Wild Life (General) Regulations, Statutory Instrument 362 of 1990.

FIRST SCHEDULE (*Section 60(4)*)

PART I

SPORT HUNTING REGISTRATION FORM

1. This form is to be submitted by the 28th of February each year or before hunting commences whichever is the sooner.

2. This applies to all animals listed in the year end hunting return intended for sport hunting by foreign clients, whether for hair or trophies and will be appearing on the CITES/NP9 form at the conclusion of a hunt.

Name of land owner: .....

Address of landowner: .....

Size of property in HECTARES: .....

Name of lessee (where appropriate): .....

Address of lessee: .....

Name of operator to whom hunting rights have been sold: .....

TRH No. of operator who will be hunting the quota: .....

Species	Quota	Species	Quota

PART II

YEAR END HUNTING RETURN

Name of landowner

Address of landowner: .....

Size of property in HECTARES

Name of lessee (where appropriate): .....

Address of lessee: .....

Name of operator(s) to whom hunting rights have been sold: .....

TRH No. of operator(s) who hunted the quota

Species	Sport hunting harvest	Management offtake	Species	Sport hunting harvest	Management offtake

1. Under sport hunting column enter all animals which have been sport hunted by foreign nationals including bait animals.

2. Under management offtake list all animals that have been taken for other reasons including hunting by local Citizens.".

Supplement to the Zimbabwean Government Gazette dated the 13th February, 1998.
Printed by the Government Printer, Harare.

BENEFICIARY CONTACT MONITORING

WARD DATA COLLECTION FORM

YEAR DATA IS COLLECTED .....

MONTH DATA IS COLLECTED .....

DISTRICT WARD IS IN .....

WARD NAME/NUMBER .....

NAME OF WARD CAMPFIRE CHAIRPERSON .....

NAME OF WARD CAMPFIRE SECRETARY .....

A.

1. Estimated Ward population .....

2. No. of Households presently in ward .....

3. Number of Ward CAMPFIRE General meetings held in 1997 .....

4. No. of Ward CAMPFIRE Committee Meetings held in 1997 .....

5. Household representation at Ward CAMPFIRE General Meetings in 1997. Complete according to number of meetings held.

Date Ward CAMPFIRE General Meeting was held	Total households attended	Number of Households represented by female members	Number of Households represented by male members

6. Present CAMPFIRE Ward Committee Composition

WCC Meetings held in 1997

Total Number	Number Male	Number Female		Date WCC meeting was held	No. Woman Committee Members Present	No. Male Committee Members Present

B.

BI. Ward CAMPFIRE Revenues (Distributed 1998 but generated 1997)

CAMPFIRE Revenue Source	Amount in Z$
Safari Hunting	
Lodges	
Photographic Safaris	
Timber	
Crafts	
Macimbi	
Grinding Mill	
.....	
.....	
.....	

B2. Total Amount Generated .....

B3. Uses of Generated 1997 CAMPFIRE Revenue

ACTIVITY	AMOUNT USED/COMMITTED

B4. Ward Projects/activities implemented wholly or partially from CAMPFIRE revenue since CAMPFIRE Started in area.

ACTIVITY / PROJECT	YEAR STARTED	IMPLEMENTATION STAGE 1= Just Starting 2=In Progress 3=Completed	NUMBER OF UNITS	TYPE OF COMMUNITY FUNDING 1=WHOLE 2=PARTIAL	COMMUNITY FINANCIAL CONTRIBUTION	OTHER FORMS OF COMMUNITY CONTRIBUTION	VALUE OF OUTSIDE FINANCIAL ASSISTANCE	SOURCE OF OUTSIDE FINANCIAL ASSISTANCE (DONORS)
A. EDUCATIONAL								
Pre-schools								
Teachers' Houses								
classroom blocks								
Toilet blocks								
Cash disbursements								
.....								
.....								
B. WATER								
Boreholes								
Weirs								
Dams								
Wells								
.....								
.....								
C. ROADS AND TRANSPORT								
Roads								
Footbridges								
Bridges								
.....								
.....								

D. HEALTH								
Clinic Blocks								
Mothers' Shelters								
Staff Houses								
Toilets								
.....								
.....								
.....								
E. COMMERCIAL								
Grinding Mills								
Tuckshops								
Warehouses								
Lodges								
Crafts Centres								
.....								
.....								
.....								
E. SOCIAL								
Football clubs								
.....								
.....								
.....								
F. OTHER								
.....								
.....								

B5. DONOR FUNDED CAMPFIRE PROJECTS WITHIN WARD

ACTIVITY / PROJECT	YEAR STARTED	IMPLEMENTATION STAGE	NUMBER OF UNITS	VALUE IN OF DONOR ASSISTANCE IN Z$	SOURCE OF ASSISTANCE (DONOR)

C.

C1. COMMUNITY NATURAL RESOURCE POLICING

ACTIVITY	NUMBER CAUGHT	NUMBER EDUCATED	NUMBER RECEIVED WARNING	NUMBER FINED	NUMBER .....
TREE CUTTING					
RIVER BANK CULTIVATION					
STARTING VELDT FIRES					
NO CONSERVATION WORKS ON ARABLE					
FISH POACHING					
GOLD PANNING					

C2. Wildlife Poaching in 1997

Wild Animal	No. Of snares found	No. Of carcasses found	No. Of people caught
Elephants			
Buffaloes			
Kudus			
Zebras			
Crocodiles			
Impalas/bucks/hares			
Lions			
Leopards			
baboons			

C2. HUMAN ANIMAL CONFLICTS AND CONTROL

Incidences of Human-Animal conflicts and control means used in 1997

TYPE OF ANIMAL	ESTIMATED TOTAL NUMBER INVOLVED	PROBLEM CAUSED	CONTROL MEANS
1. ELEPHANTS			
2. CROCODILES			
3. BUFFALOES			
4. LIONS			
5. LEOPARDS			
6. BABOONS			

D

D1. TYPES OF TRAINING RECEIVED IN 1997 BY WARD MEMBERS UNDER CAMPFIRE PROGRAMME

TRAINING ACTIVITY	WHO ATTENDED	NUMBER ATTENDED	FACILITATING ORGANISATION	WHO FINANCED COURSE	COMMENTS
Constitution Development	WCC members				
	Resource monitors and game scouts				
	Traditional Leaders				
By-law Formulation	WCC members				
	Resource monitors and game scouts				
	Traditional Leaders				
Project management Courses	WCC members				
	Resource monitors and game scouts				
	Traditional Leaders				

Monitoring and Evaluation	WCC members				
	Resource monitors and game scouts				
	Traditional Leaders				
Quota setting	WCC members				
	Resource monitors and game scouts				
	Traditional Leaders				
wildlife Ground Counting	WCC members				
	Resource monitors and game scouts				
	Traditional Leaders				
Problem Animal Control	WCC members				
	Resource monitors and game scouts				
	Traditional Leaders				

Land Use Planning	WCC members				
	Resource monitors and game scouts				
	Traditional Leaders				
Bookkeeping and Record keeping	WCC members				
	Resource monitors and game scouts				
	Traditional Leaders				
Financial Management	WCC members				
	Resource monitors and game scouts				
	Traditional Leaders				
Meeting Procedures and Conflict resolution	WCC members				
	Resource monitors and game scouts				
	Traditional Leaders				
	WCC members				
	Resource monitors and game scouts				
	Traditional Leaders				

	WCC members				
	Resource monitors and game scouts				
	Traditional Leaders				
	WCC members				
	Resource monitors and game scouts				
	Traditional Leaders				

E.

E1. Do you receive minutes from Village CAMPFIRE Meetings ..... 1=Yes 2=No.

E2. Do you have a Ward Bank account ..... 1=Yes 2=No

E3. Where do you get assistance for your Ward development Activities?

.....

.....

.....

.....

.....

.....

.....

.....

APPENDIX J

PUBLIC CONTROVERSY AND THE MEDIA

1. Example of Local Press Coverage of Elephants and CAMPFIRE, March 1998
2. Animal Rights Position and Campaign, HSUS Exhibits
3. What the Experts Say
4. ART Response to HSUS
5. Exibits of the Range of Media Coverage

hamper conservation.

Michael De Alessi is a research associate at CEI and attended the CITES meeting in Zimbabwe.

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Appendix J

The Herald

Incorporating the Nation

ESTABLISHED 1891
Registered at the GPO as a newspaper

HARARE, TUESDAY MARCH 24 1998

PRICE: $3,00
(Including sales tax)

P.O. Box 396, Harare Phone 708771 Telex No. 20108 ZIMNEWS ZW Fax 701211 or 703309

mazda

GET THE FEELIN

Wild animals wreak havoc

USHO PROBLEM . . . These villagers in Gokwe sift through one of the flattened maize fields recently, salvaging the little that was left after elephants destroyed hectares of maize and cotton in the area.

Elephants destroy 50 000h fields, lions kill livestock

Herald Reporter

TWO elephant herds have destroyed 50 000 hectares of cotton and maize in the Nenyunga and Siamchembu chieftainships of Gokwe North, while lions are killing livestock.

The elephants have left villagers in Zhomba, Kamakuta, Nenyunga and Siamchembu areas with nothing to harvest as all their maize and cotton crops were destroyed.

Now, there are fears that communal farmers in these areas along the Sengwa River may need drought relief food this year if nothing is done to control the elephants.

A lone bull also gored and trampled a 60-year-old woman, Mrs Conese Chitkono of Mutemarunga village in Madzivazvido, to death on Wednesday morning as she was harvesting crops in her field and Mr Mavious Shanaura, who was herding cattle in Nenyunga area, was injured by the elephants last week.

The elephants, which are roaming the area in two groups of 15 and 20, are now giving Nenyunga and Siamchembu communal farmers sleepless nights as they invade fields and destroy all crops they come across.

It is understood that the elephants move from the game corridor running between Chirisa Safari Area and Chizarira National Park to the nearby villages of Nenyunga, Siamchembu, Madzivazvido, Kahobo and Chireya 5.

The councillor for Nenyunga ward, Cllr Eleck Mkandla, said the animals roam the fields in broad daylight scaring

people from o activities.

Although Gokwe Rural District C had a problem control contract safari operator to the animals, he h been able to succ control them.

Cllr Mkandla sa contract obliges th operator to react wild animals. He a the operator of tr scare off the anim rubber bullets.

He said the pe Nenyunga were pe ing to the perenn mal problem, "otl they have the cap adequately feed selves. Council use Campfire pr on people whose have been destro the wild animals".

Zhomba farm Johnson Pando zanywa, whose 51

To Page

Elephants wreak havoc

● From Page 1

ton field was destroyed only last week, said: "I will not be able to pay back my credits with Cottco because of the extensive destruction to my field. Most people here have failed to send their children to school over the years. The safari operator has breached his contract so council should look for other alternatives to protect us. Lions are also a problem here."

Gokwe North Rural District Council chief executive Mr Allan Chinho said in an interview last week that the problem animal control team had failed to contain the rogue elephants.

Mr Chinho said the elephants were now used to shotgun sounds and they retaliate by charging instead of being scared off.

There was also a problem of late supply of ammunition to the safari operator or council-assigned game guards.

"The safari operator comes second in reaction. He has full facilities to carry out PAC but he is dealing with two districts: Gokwe South and North. This could be the major problem to his ability to react."

However, Mr Chinho said council was looking at the problem seriously because "we might end up having a greater number of people needing drought relief food in the area. We have asked the Department of National Parks and Wildlife Management to assist in containing the situation. In view of the fields that have been destroyed so far, the animal problem is so acute," said Mr Chinho.

He said there was need to contain the animal problem if the villagers were to harvest the remaining crops in the fields.

Wild animal menace needs immediate solution

THE destruction of 50 000 hectares of maize and cotton in Gokv North, the crops of around 10 000 families, by two fairly sm herds of elephants shows up dramatically the immense social co of wildlife conservation borne by some of the poorest people in th country.

Much of the population in a fairly wide swathe of countrysi would have been able to support themselves this year. Now th are going to have to ask for drought relief, not a pleasant prospe for hardworking families prepared to toil on their own land.

A few years ago this destruction could have been extremely lir ited. Within a day or two of the invasion of the elephants, t marauding creatures would have been shot dead or driven ba into the wildlife areas. The few families directly affected cou easily have been compensated from the sale of ivory and the me would have given most in the community a decent meal.

These days international pressure makes the logical response an elephant invasion some sort of crime. There are many in t North, and we saw this dramatically at the Cites conference Harare last year, who literally weep when an elephant dies whi shrugging off the genocide in Rwanda.

Such people certainly would not worry about 10 000 famili reduced to beggary so long as 35 elephant could continue to wa der free, destroying crops. Or rather, such people do not wor about 10 000 poor African families, it would be different if thos who suffered lived in the suburbs of London or New York.

It is time to stop the nonsense. People are more important tha elephants. But that does not mean elephants should be exterm nated, as the wolves of Britain were wiped out or dangerous an mals in other parts of the North brought close to extinction.

Instead elephants should be considered an important source income and a useful renewable resource in areas such as Gokw North. It was noteworthy in our report yesterday that the people the area had some positive thoughts on how Campfire funds coul be used, as well as on the need for better control of probler animals.

Indeed, the whole approach of the farmers up near Chirisa Saf ri Area is considerably more sophisticated than that of the je setting do-gooders who dominate the international "conservation lobby.

The whole Campfire concept was tailor-made for marginal area like Gokwe North where the only real way anyone can make decent living is to have multiple sources of income. Crops, live stock, wildlife, safari operations and tourism all have to be tapped

In good years, when all come right, incomes will be good. Bu even in bad years — when drought, floods or animal disease strike — people can be assured that something will bring in surviv al income. Under those circumstances people will tolerate ele phants a lot more happily although they might well prefer to sel hunting licences to those who promise to deal with problem ani mals first.

Yet it is this integrated approach that is so condemned by the do gooders. They see the world in blocks. People live in fancy citie surrounded by very gentrified countryside in rich countries. Ani mals live in big national parks in poor countries where they can b visited.

The North has, by and large, destroyed its more dangerous na tural resources. If the so-called conservationists want the same t happen in Africa they are going the right way about it. If larg dangerous animals destroy livelihoods rather than enhance them then they will go. Villagers are quite capable of co-operating wit poachers if no one else will help.

Yet much of Africa is desperately trying to truly conserve ele phant and other dangerous wildlife. Experts throughout the conti nent have seized Zimbabwe's Campfire concept as a serious solu tion to twin problems: how to enhance standards of living and hov to conserve wildlife for future generations. With careful pro grammes not only are both possible, but either is only possibl with the other.

Zimbabwe needs to unilaterally implement such policies if n one else will agree. And in the meantime someone in authorit should authorise immediately the hunting or removal of those Go kwe North problem elephants.

CAMPFIRE:

A Close Look at the Costs and Consequences

APRIL 1997

The Humane Society of the United States (HSUS) was founded in 1954 to promote the humane treatment of animals and foster respect and compassion for, and understanding of, all creatures. Today its message of care and protection embraces not only the animal kingdom but also the earth and its environment. To achieve its goals, The HSUS works through educational, legislative, and investigative means. The HSUS maintains nine regional offices in the United States; its worldwide outreach is supported by its global humane family of organizations. **Humane Society International (HSI)** is The HSUS in its work abroad.

THE HUMANE SOCIETY OF THE UNITED STATES / HUMANE SOCIETY INTERNATIONAL

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CAMPFIRE: A Close Look at the Costs and Consequences

The Humane Society of the United States (HSUS) is the largest animal protection organization in the United States, with more than 4.1 million members and constituents nationwide.

Although we recognize that bilateral and multilateral development assistance agencies can play a constructive role in international development assistance, The HSUS is strongly opposed to programs that, in the interest of pursuing development, encourage consumptive use of wildlife for international markets. Specifically, we strongly oppose the use of American tax dollars to support programs that promote or enable international trade in, or trophy hunting of, endangered or threatened species.

Over-exploitation of wild plant and animal species for international commercial trade is becoming an increasingly important factor contributing to the loss of global biodiversity. Each year, thousands of species of plants and animals and their products are traded internationally in a marketplace worth billions of dollars. Many plants and animals in trade are taken from wild populations. Two familiar examples are the rhinoceros and African elephant. Over the last two decades alone, 90% of the world's rhinos and half of Africa's elephants have been killed to satisfy demand for rhino horn and ivory. For some species, including parrots, orchids, cacti, lizards, fishes and other species, unsustainable trade constitutes the chief threat to their survival.

The HSUS has learned that the U.S. Agency for International Development (USAID) funds a number of programs, all in southern Africa, that encourage and enable consumptive use of wildlife for international markets. One such program is the Communal Areas Management Programme for Indigenous Resources (CAMPFIRE) in Zimbabwe, which is funded through USAID's Natural Resources Management Program. The program received over $7 million dollars from USAID between 1989 and 1996, and USAID plans to provide another $20 million between now and August 1999. Through extensive research, made more difficult by USAID's poor response to our request for documents under the Freedom of Information Act, The HSUS has learned the following facts about the CAMPFIRE program, which are elaborated on in detail in attached Appendices:

- CAMPFIRE is based primarily on trophy hunting of African elephants, a species considered threatened with extinction under the U.S. Endangered Species Act (see Appendix 1). A 1995 USAID audit of CAMPFIRE acknowledged that one of the purposes of the program is the "establishment of viable wildlife management schemes to encourage income generation from safaris and hunting." USAID has also acknowledged that they used tax dollars to provide assistance to two Zimbabwe government officials to attend an

annual meeting of Safari Club International, where they represented the Zimbabwe trophy hunting industry. Eighty-four percent of Americans oppose elephant trophy hunting, and the same number oppose taxpayer dollars being used to promote or enable elephant trophy hunting. These were the results of a December 1996 nationwide poll conducted by Penn & Schoen Associates, Inc. Yet, through USAID, taxpayer funds are being used to promote and enable elephant trophy hunting.

- CAMPFIRE advocates the resumption of the international ivory trade (see Appendix II). The ivory trade caused the continental African elephant population to plummet by more than 50% between 1979 and 1989. In 1989, the ivory trade was banned by the Parties to the Convention on International Trade in Endangered Species of Wild Fauna and Flora. The U.S. has opposed the resumption of the ivory trade since 1989. Yet, through USAID, taxpayer funds are being used by CAMPFIRE implementing agencies to lobby for resumption of the ivory trade, in opposition to U.S. policy.

- CAMPFIRE has lobbied to weaken the U.S. Endangered Species Act to make it easier for endangered and threatened species to be imported to the U.S. for commercial and other purposes (see Appendix III). CAMPFIRE implementing agencies have misused taxpayer dollars to facilitate this lobbying.

- CAMPFIRE is environmentally unsound (see Appendix IV). The methodology used to monitor wildlife populations is questionable, and there is a lack of quantitative assessment of the potential impacts on wildlife resulting from the project. More mature male elephants are being killed on CAMPFIRE lands than can be sustained by the population.

- CAMPFIRE implementing agencies, notably the Zimbabwe Department of National Parks and Wild Life Management as well as the Campfire Districts, are plagued by corruption and mismanagement (see Appendix V).

- CAMPFIRE funds have been poorly managed by USAID/Zimbabwe which, according to a USAID auditor, did not always ensure that project commodities were properly accounted for and used as intended (see Appendix VI). As a result, commodities valued at about $470,000 were not used effectively.

- CAMPFIRE provides more financial benefits to the implementing agencies than it does rural villagers (see Appendix VII).

- CAMPFIRE is not socio-economically sound and has not successfully involved local people in wildlife management (see Appendix VIII). CAMPFIRE is driven from the top-down by the Zimbabwe government and the implementing agencies, not from the villagers themselves. A consulting firm, hired by USAID to provide a mid-term evaluation of the program, said that such an approach is subject to collapse once donor funding is withdrawn.

- CAMPFIRE is a waste of taxpayer dollars. Since 1989, USAID has invested approximately $7 million dollars in trying to make CAMPFIRE work. For every taxpayer dollar USAID has spent on CAMPFIRE, CAMPFIRE itself has earned only 52 cents, of which only five cents reached village households (Appendix IX) . With no hope for self-sufficiency, and with villagers receiving comparatively little financial benefit from the program, CAMPFIRE is a waste of taxpayer dollars.

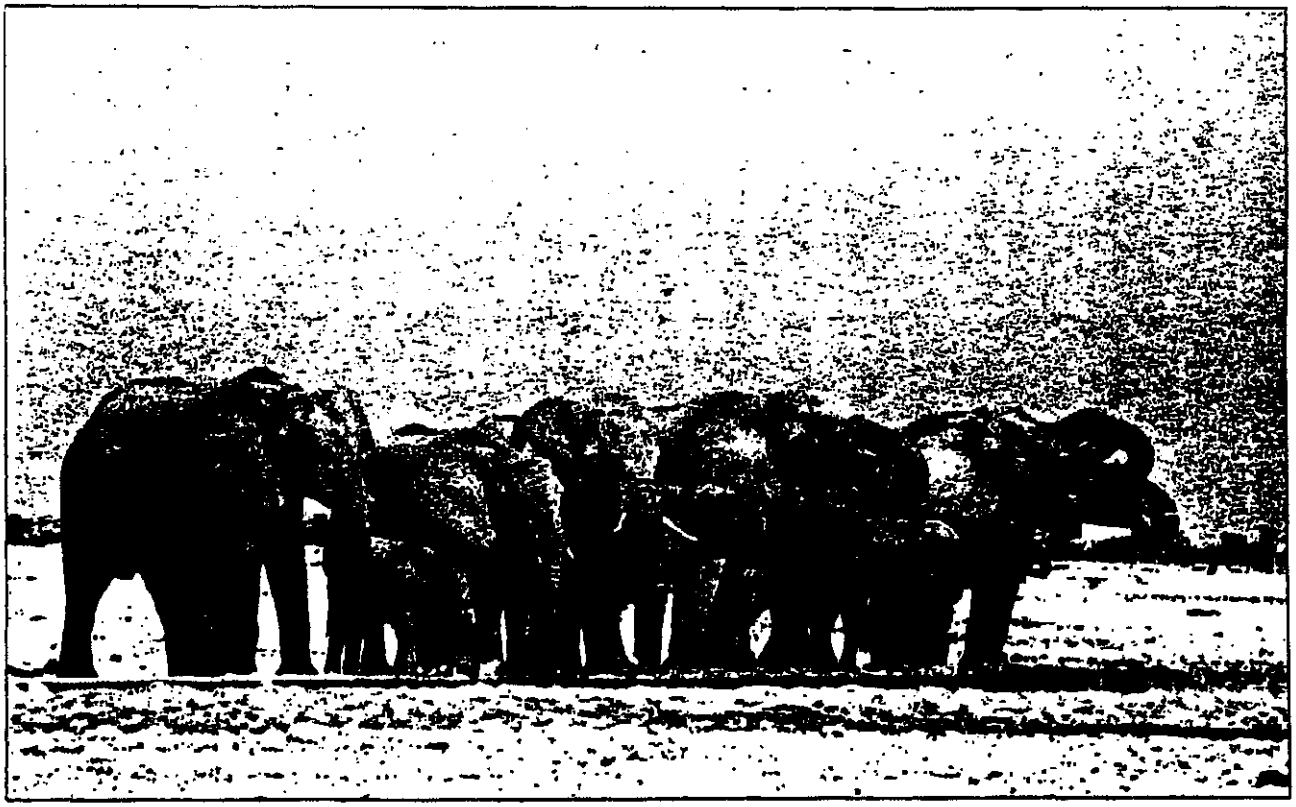
- One CAMPFIRE implementing agency, Africa Resources Trust, has been granted approximately $600,000 per year in American taxpayer dollars by USAID to open offices in several important capital cities around the world, including in Washington DC,

to influence national and international policies (including, apparently, to weaken the U.S. Endangered Species Act and to lobby CITES Parties for resumption of the international ivory trade), to produce lobbying documents, to challenge environmental protection organizations and causes, and to promote trophy hunting of threatened species in Zimbabwe (see Appendix X). USAID should not use taxpayer dollars to fund anti-environmental lobbying activities.

In summary,The HSUS strongly recommends that bilateral and multilateral development assistance agencies take steps to ensure that funds are not used to promote or enable consumptive use of wildlife for international markets, specifically for trophy hunting of or wildlife trade in endangered or threatened species.

In addition, The HSUS believes that the CAMPFIRE program cannot be reformed to address the concerns we have raised in this report. CAMPFIRE is not environmentally, socially, economically, or ethically sound. It is a program that subsidizes trophy hunting, promotes the ivory trade, and uses taxpayer dollars to lobby for changes in U.S. laws and regulations. Therefore, HSUS recommends that USAID funding for the CAMPFIRE program be immediately terminated. The HSUS certainly has no objection to helping impoverished people in Zimbabwe or elsewhere. However, such activities must not promote or enable consumptive use of endangered and threatened wildlife for international markets or provide development assistance dollars to anti-environmental organizations who promote such wildlife use and trade.

Across Africa, people have embraced less destructive means of living with and profiting from wildlife through well-planned, community-based ecotourism or community development programs that are based on development and enhancement of cottage industries that are unrelated to wildlife (see Appendix XI). These are the types of projects development assistance agencies should be funding. They are economically and biologically sustainable and will help both people and wildlife in the long-term.



ELP END THIS OUTRAGE!

nocent elephants aughtered for in — & YOU'RE AYING FOR IT!

GENTLE, BELOVED African elephant is a threatened species.

cruelty beyond belief . . . PAID FOR BY YOU!

tless bureaucrats are forking over millions of ax dollars to organizations that promote the and bloody trophy hunting of African ele-, a beloved and threatened species.

dibly, the U.S. Agency for International Develop-USAID) is handing this fortune to pro-hunting that are also lobbying to overturn the interna-an on the sale of ivory — which would lead to olesale slaughter of itle beasts.

n atrocity!" fumed new-ed U.S. Sen. Wayne Al--Colo.), the only veter-in the Senate.

trageous that taxes paid cans, who almost univer-re the elephant, should be bureaucrats on such a

llous and brutal."

ately, you can assist Sena- in his quest to stop fund-is vicious purpose — by ut and mailing The ER coupon at right.

JSAID has given about $10 o African-ganizations mments to at hunters lands for safaris.

opping $20 ore of U.S. ey will be them over our years.

t for an el-s usually d sickening, says Dr. lecky, a zoologist and l with the Humane the U.S.

one recent hunt, a sportsman shot a arrow into an ele-belly. The animal n pain and loped off ush.

of putting the animal out of its misery — a fundamental rule of hunting — the "sportsman" returned to his luxurious camp for refreshments.

Later, the hunter found the bloodied beast nursing its wounds. He quickly fired another arrow into its chest.

As the dying animal shrieked in terror, three more arrows ripped into its flesh.

The majestic creature toppled to the ground. Another rich hunter had satisfied his blood lust and got a trophy to show his friends. It cost him roughly $60,000.

The pro-hunting African organizations receiving Uncle Sam's dollars say the hunts provide funds for local villagers. But Dr. Telecky says very little of the money reaches those who need it. Instead, it goes to support the organizations' bureaucracies and to their lobbying and promotion efforts.

If the U.S. government really wants to help poor Africans, observed Dr. Telecky, "it could just donate the money directly to the villages."

— WILLIAM BARNHILL

ONCE-STATELY beast is now just a trophy on a wall.

U.S. Senator Wayne Allard is asking you to join the fight against this "atrocity."

Here's what you can do

Here's how you can help stop the slaughter of these innocent creatures.

Says Sen. Allard: "When Congress reconvenes in January, I plan to fight for an end to this program."

And he needs your completed coupon to demonstrate the public is behind him.

"Please join me in the fight by filling out the coupon below," said Allard. "Demand that Congress put an end to the taxpayer-subsidized slaughter of elephants."

Complete, then clip and mail this coupon to: Save the Elephants, c/o National Enquirer, Lantana, Fla. 33464.

To the U.S. Congress:

ENQUIRER READER POWER

I am appalled that millions in tax dollars are being spent by the U.S. Agency for International Development to promote the cruel trophy hunting of innocent African elephants. I want Congress to act swiftly to stop funding this senseless slaughter.

Name _____

Address _____

City, State, Zip _____

Phone _____

Comments _____

The National Enquirer Dec 96

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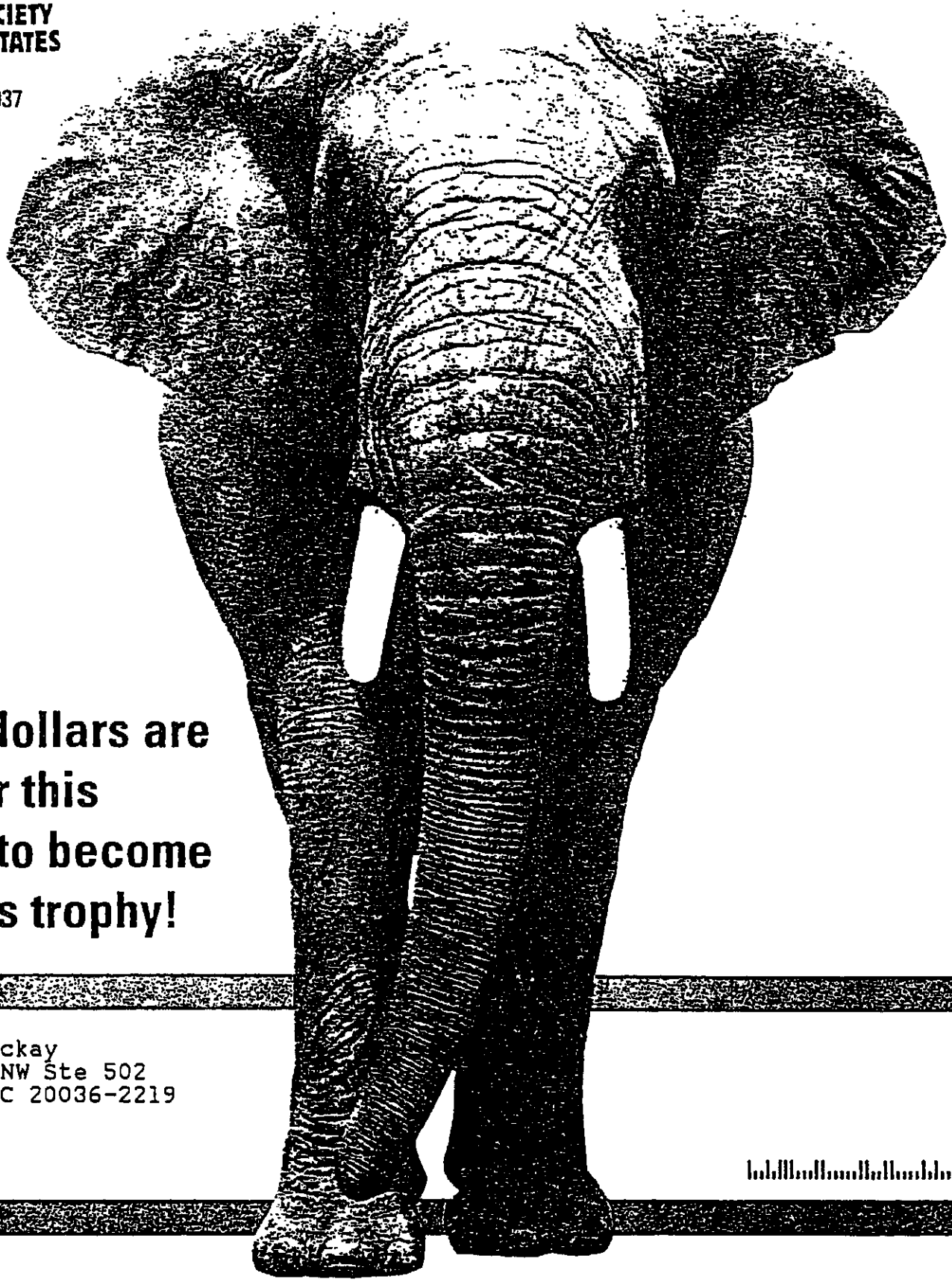

r tax dollars are
ing for this
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auren Mackay
16th St NW Ste 502
ngton, DC 20036-2219

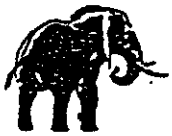
Anti Elephant Trophy Hunting Petition Enclos for Ms. Mackay

THE HUMANE SOCIETY OF THE UNITED STATES

PETITION TO SAVE THE ELEPHANTS

to

The President of the United States Bill Clinton; and
The Vice President of the United States Albert Gore



WHEREAS, as a registered voter and taxpaying citizen of the United States of America I find it patently offensive and legislatively inexcusable that my tax dollars are being used to support programs that promote trophy hunting of African elephants, and the international ivory trade, and

WHEREAS, said African elephants are already listed as "threatened" under the U.S. Endangered Species Act, and

WHEREAS, continued support for these programs is leading to increased pressure to remove or relax the international ban on ivory trade, leading to even greater slaughter of elephants, and

WHEREAS, both of you distinguished leaders have expressed a concern for the environment and the protection of endangered and threatened species,

THEREFORE, I am supporting the work of The Humane Society of the United States in demanding an immediate cessation of U.S. Government funding, through U.S. AID, of any program which encourages elephant trophy hunting in Africa.

Respectfully signed this_____Day of_____, 1997 by

s/_____ s/ _____

2100 L STREET, NW, WASHINGTON, DC 20037

Please DO NOT separate. Fold at the red arrows ◀ ▶ and return entire form in pre-paid envelope provided.

The United States can't lead the world in conservation efforts and encourage the killing of elephants. Help stop this hypocrisy!

Ms. Lauren Mackay
1400 16th St NW Ste 502
Washington, DC 20036-2219

Dear Ms. Mackay,

Consider the magnificence of this great animal, the sheer majesty of his very presence.

Then imagine a hunter, stalking by vehicle, then crouching in the underbrush, coldly taking aim, and firing his high-powered rifle... once, maybe several times.

The mighty beast screams in anguish, then staggers, bleeding from his wounds, and falls to the ground with a tremendous crash.

Using your tax dollars to promote elephant killing is an outrage! We must stop it. NOW!

The hunter and his helpers approach and, after celebrating their "success" and taking pictures, start to hack away at this once-great animal, sawing his ivory tusks off, or his majestic head, to serve as a trophy.

Sickening, isn't it?

But there is more. Imagine that this horrible scene is taking place...

...and you are paying the bill.

Ms. Mackay, as difficult as it may be to believe, this is not a scene in some 1950's movie. It's real. Painfully, frighteningly real ... and your tax dollars make it possible!

I'm telling you this not to make you sick, but to make you

angry. And to ask you to join with me, and The Humane Society of the United States right now, in helping to end this abomination once and for all!

We must stop it! And there is not a minute to spare. Let me explain.

The U.S. Agency for International Development (U.S. AID) has already paid as much as $7 MILLION to organizations that promote "trophy hunting" of African elephants and the international ivory trade --

-- despite African elephants being listed as "threatened" under the U.S. Endangered Species Act --

-- despite the fact that more than 8 out of 10 Americans are opposed to elephant trophy hunting --

-- despite the fact that 8 out of 10 Americans also oppose U.S. foreign assistance being used for the purpose, and --

-- despite the fact this program supports the re-opening of the international ivory trade which cut Africa's elephant population by HALF from 1979 to 1989!

Plus, not satisfied with the current level of slaughter supported by U.S. taxpayer funds, U.S. AID wants to spend $20 million more on this wasteful program over the next four years!

Why?! Why would an agency of the U.S. government even consider such a program?!

Well, their explanation is that it is a way to provide much needed income to some impoverished villages in Africa.

In the kindest terms possible, my friend, that is a myth. A total, absolute myth.

Your tax dollars help fund a program called CAMPFIRE (Communal Areas Management Program for Indigenous Resources) but little of the money goes to help villages.

Instead, your money subsidizes the trophy killing of elephants and other wildlife, with only a small amount of money going to help the villages in need.

In truth, the people who benefit most from this legalized slaughter of elephants are those who organize the killing

safaris and a handful of officials who skim off the rest of the money!

Even if the "idealistic" goals of this program were legitimate and attainable, it would still be inexcusable.

Why not simply take the same $20 million, use it to develop programs that don't involve the killing of animals, and distribute it directly among the villages where it is most desperately needed for food, water, and medical care?

Instead, it is spent on a misguided program that could lead to the ultimate extinction of one of the most cherished species of animals on this planet!

Putting an end to this travesty is one of our highest priorities at The Humane Society of the United States.

And I'm appealing to you, today, as one of our most important and loyal HSUS members, to help us do just that.

There are several things I'm asking you to do.

In this mailing, you'll find a Petition addressed to President Bill Clinton and Vice President Al Gore.

It reminds each of these two Administration leaders of their professed commitment to protect animals and the environment.

I'm asking you to sign that Petition and and return it to me today, so we can demonstrate without the slightest doubt, how strongly the American people feel about this issue. We intend to deliver your Petition to President Clinton, soon, along with those received from other HSUS supporters.

I firmly believe that our Petition to the President and Vice President makes it clear the continuation -- much less expansion!! -- of this program will not be tolerated!

So no matter what else you may do after reading this letter, PLEASE return your signed Petition.

(By adding your Petition to those from other caring HSUS friends, and delivering them all at once, we can achieve far greater impact than if delivered separately.)

The urgency could not be more apparent. The more we are delayed in ending this horrible and destructive program, the

more scenes like the one I described earlier will take place.

We cannot stand by and let this senseless slaughter of these wonderful animals continue!

So please return your signed Petition today.

In addition, however, I hope desperately that you will be able to find it in your heart and in your means to enclose with your signed Petition the most generous contribution you can possibly spare.

Whether it's $15, $25, $50 or any other amount, you know it will be put to good use by reaching as many people as possible with the urgent message that we must stop the U.S. government-funded promotion of the senseless slaughter of African elephants and help protect ALL animals from cruelty and abuse.

It is only the help of caring friends like you that makes our every effort possible. Ms. Mackay, please help again. Thank you.

Sincerely,

Paul G. Irwin
President

P.S. Please sign and return the Petition, even if you can't send a contribution. I also hope you'll use the special stamps I've enclosed to tell others about our life-saving campaign. Please remember that your gift of $15, $25, or $50, will make a difference. Thanks!

P.P.S. The taxpayer funded CAMPFIRE program is using these government funds to entice hunters to shoot African elephants for trophies. Others are lobbying hard for a return to ivory trading. There's literally not a minute to spare. Please return the Petition today. Thanks again.

HSUS

WHAT THE EXPERTS SAY ABOUT CAMPFIRE, ITS SISTER PROGRAMS, AND USAID FUNDING

"..... everything I know about the CAMPFIRE programme tells me that it is world class. Its strategy for the sustainable harvesting of elephant populations for the benefit of both the elephants and local people has my full support, and that of my colleagues in conservation biology ..... even the most casual analysis tells one that, in the case of the elephants, the CAMPFIRE programme is on the right side and the HSUS is on the wrong side". Paul Ehrlich, Stanford University.

"By allowing people to derive a direct economic benefit through the sustainable utilization of their own resources, the dependence on foreign aid is broken. ..... CAMPFIRE has helped establish that environmental protection and wildlife conservation can help to improve, and are indeed essential to improving, the quality of human life. Therefore in the interest of wildlife, the environment, and people, we urge you not only to maintain your support for CAMPFIRE, but to help expand programs like it in the future". Barbara Bramble, National Wildlife Federation

"The only way to save wildlife and wildlands, especially in poverty ridden areas, is to provide human beings with incentives to save nature. Most conservationists have come to accept this. Those who oppose it have yet to come up with an alternative that works. We sincerely hope that as CAMPFIRE matures, certain changes will occur. But to cut the AID funding to CAMPFIRE, will only engender more human poverty and suffering as well as enormous losses of African wildlife and habitat". Mike Wright, African Wildlife Foundation

"By working with people on communal lands to take marginal agricultural and grazing lands and turn them to economically productive use, CAMPFIRE attempts to provide people at the local level a better livelihood. Furthermore, by providing land for wildlife outside of reserves and national parks, CAMPFIRE and its sister programs in other countries produce a real conservation benefit." John Robinson, Wildlife Conservation Society

"I applaud USAID's support of community based natural resource management programs in Africa, as these programs are vital to conservation of biodiversity. I strongly encourage you to continue to fund these important conservation initiatives". Dr George Rabb, Chicago Zoological Society

"Community-based management of natural resources....is proving to be effective in both substantially improving the quality of the lives of the people....and in providing strong incentives for the rural people to conserve the resources..... I applaud USAID's investment in rural community management of renewable natural resources in Africa and strongly endorse continuation of your funding for these important initiatives". David McDowell, IUCN - The World Conservation Union

"Through the NRM program, USAID has become a world leader in supporting innovative efforts to understand the complex relationship between conservation and development. Conservationists recognize that without incentives for humans to conserve wildlife and their habitats, animals and the environment will lose. In the interests of wildlife and the people of southern africa, the regional NRM Program deserves continued support". James Leape, World Wildlife Fund

"CAMPFIRE is an organization that proves that humans and wildlife can coexist and flourish. ..... CAMPFIRE not only reflects the basic tenets of the United States' wildlife policies, but exemplifies the highest goals and successes possible through America's involvement in foreign developments. CAMPFIRE deserves our continued national support, admiration and respect". Robert Easterbrook, Safari Club International

A response by the CAMPFIRE Collaborative Group (CCG) to the Humane Society of the United States pamphlet 'CAMPFIRE: A Close Look at the Costs and Consequences'

A close look at the facts and fiction behind the HSUS 'Anti-CAMPFIRE Campaign'

For more information about the CCG and what is *really* happening in CAMPFIRE, contact: The CAMPFIRE Association, Mukuvisi Woodlands, PO Box 661, Harare. Tel.: 747152, 747436; Fax: 795150.

The HSUS pamphlet entitled 'CAMPFIRE: A Close Look at the Costs and Consequences' represents the latest effort in its long-running campaign to undermine and discredit Zimbabwe's conservation policies. The accusations levelled against CAMPFIRE are unfounded and reflect a deep-seated ethical divide between the 'animal rights' philosophy of the HSUS and contemporary practices in conservation and rural development. The conclusions that HSUS draws about CAMPFIRE are at odds with the expert opinions of WWF, IUCN, USAID and IIED, who along with over 40 other renowned international institutions and academics, have indicated that they believe CAMPFIRE to be in the forefront of global conservation initiatives.

Of serious concern is that HSUS presents information that is frequently wrong, incomplete and misleading. It is difficult to avoid the conclusion that this is a deliberate attempt at distortion to validate their philosophy, with scant regard for the truth, human welfare or conservation. This is borne out by the nature of the 'extensive research' which it claims to have undertaken. This involved HSUS funding a single covert 'evaluation mission' to Zimbabwe. **Of the two-member research team, it is understood that one withdrew on the grounds that the 'evaluation' appeared to be a disruptive and unethical attempt to undermine a successful conservation and development programme.**

The following is a brief presentation of the facts relating to each of the HSUS's false claims:

HSUS CLAIMS: CAMPFIRE is environmentally unsound, its ecological monitoring questionable and elephant use unsustainable.
The documented evidence flatly contradicts this! For example, the 1996 CITES panel of experts report reviewed what it referred to as 'one of the best elephant data sets in Africa' and concluded that 'the elephant population is large, increasing and viable, and no serious risks have been identified'. As evidence for the unsustainable off-take of bull elephants, **HSUS quotes a WWF report, the author of which has responded stating 'whilst the information contained is factually correct, it has been used out of context and is consequently totally misleading'.** Other reputable institutions, such as IIED, whose reports are quoted by HSUS to substantiate its allegations have stated that their research is also being used by HSUS in a misleading manner.

HSUS CLAIMS: CAMPFIRE is based primarily on trophy hunting of the 'threatened' elephant.
CAMPFIRE is 'based' upon devolution of control of natural resources to local communities. If HSUS means that the majority of funds are generated by the elephant, this is correct. But it is wrong to say that the elephant is 'threatened' with extinction in Zimbabwe. An independent EU-funded survey, 'Elesnap', in 1996 estimated that Zimbabwe has some 66,000 elephants, with an effective growth rate (ie. after natural mortality and offtakes) of 2.1% per annum over the last 15 years. **Far from threatening the survival of the elephant, CAMPFIRE has contributed significantly to its conservation. Since the introduction of CAMPFIRE in communal lands, the number of elephants shot has decreased from approximately 300 per year, primarily for crop raiding, to 150 per year for all reasons.**

HSUS CLAIMS: CAMPFIRE is not socio-economically sound and is not socially acceptable.
CAMPFIRE is based upon the devolution of control of, and benefits from, natural resources to local communities. The programme can only work on the basis of its acceptability by communities. Since 1989, over half the countries districts have voluntarily joined the CAMPFIRE Association and well over a thousand democratically elected village CAMPFIRE committees have been established. This is not to deny that there is no conflict or change. Managing commonly owned resources necessitates deciding cost and benefit flow which requires painstaking consensus building and conflict resolution. HSUS base their analysis of the programs social suitability on the observation that at any one point in time there are vigorous disputes. The CCG would argue that this is one of the indicators of a strong and successful democratisation process. **Ultimately the best 'proof' of whether or not CAMPFIRE is participatory is to ask the people. Many of their representatives are at this CITES COP and we would urge HSUS to take the opportunity to ask them about CAMPFIRE's social acceptability.**

HSUS CLAIMS: CAMPFIRE is a waste of US taxpayers' dollars.
This conclusion is reached on the basis that the revenue generated from the resource base by CAMPFIRE is equal to approximately 50% of the total USAID grant. This grant is used to deliver services that are in effect an investment in institutional capacity building and skills development at the local level and will be phased out over time. Because USAID subsidises training and infrastructure at this early stage, communities are able to benefit directly from revenues. **The most recent data on CAMPFIRE, analysed and verified by WWF Zimbabwe, indicates that no less than 56% of revenues generated by CAMPFIRE are being returned directly to local communities, contrary to the 11% claimed by HSUS.**

HSUS CLAIMS: CAMPFIRE provides greater benefit to the implementing agencies than to villagers.
USAID funds are used to enhance capacity with the

aim of establishing a sustainable community based programme. The NGOs involved provide cost-effective capaciy building services to CAMPFIRE communities to enable them to manage their wildlife sustainably. To suggest donor funds should go directly to local people is naive in the extreme. Simply giving people a handout perpetuates the vicious cycle of dependence. **CAMPFIRE enables people to break away from this dependency through the establishment of sustainable production systems which enable them to generate their own revenue and determine their own futures.**

HSUS CLAIMS: One CAMPFIRE implementing agency, Africa Resources Trust (ART), uses USAID funds to undertake 'anti-environmental' activities in the US.
Whilst ART does have an office in the US this is not funded by USAID nor do the activities undertaken there or elsewhere by ART resemble those claimed by HSUS. The accusation that ART is part of 'the wise-use, anti-environment movement' comes as no surprise given that HSUS characterises WWF and IUCN as being part of 'a new generation of big game hunters and traffickers in wildlife'. **HSUS is attacking ART for working in partnership with the leading global environmental agencies and for advocating the principles of the Convention on Biological Diversity (CBD)!**

HSUS CLAIMS: CAMPFIRE is riddled with corruption.
This very serious accusation is made with only the flimsiest of 'evidence' comprising a few newspaper articles. HSUS is aware that in most of these cases, subsequent reports and findings have led to these accusations being dropped. For example, investigations by both USAID and the government of allegations that CAMPFIRE funds were misused in Nyaminyami have shown these to be false. **HSUS has been invited by the government to present any evidence of corruption so that this can be fully investigated, but it has failed to respond.**

HSUS CLAIMS: CAMPFIRE has misused USAID funds to undertake illegal lobbying of the US Congress to weaken the US Endangered Species Act.
This allegation led to a comprehensive review of the activities of the CAMPFIRE implementors by the USAID office of the General Counsel. **The review concluded that 'the allegations did not disclose any existence of a violation of the lobbying restrictions'.** Despite having been informed of this finding, HSUS continues to make this spurious claim.

HSUS CLAIMS: CAMPFIRE advocates the resumption of the ivory trade in opposition to US policy.
Several members of the CCG believe that it is important for the international community to examine the possibilities for the reintroduction of a well-regulated trade in elephant products. **This is a position strongly supported by a range of conservation and development arguments, not least of which is that CAMPFIRE communities own elephant products which represent a large and moribund asset to some of the poorest communities in the world.** The implication that CAMPFIRE has used USAID funds to undertake lobbying to reopen the ivory trade is wrong.

The CCG believes that HSUS has every right to maintain its animal rights philosophy even if this is at odds with mainstream conservation and development approaches endorsed by the CBD (also subject to numerous attacks by HSUS). However, it should not have the right to impose its protectionist philosophy through unethical methods involving a smoke screen of false claims and accusations and the misrepresentation or omission of documented information.

Briefing on 'anti-CAMPFIRE' campaign in the USA

Background
Over the last 8 years the Humane Society of the US (HSUS), in conjunction with other animal rights organisations, have been involved in a campaign to discredit the concept of sustainable use of natural resources as endorsed by the Convention on Biological Diversity (CBD). This has arisen from a deep-seated ethical divide between the 'animal rights' philosophy and contemporary practices in conservation and development. One notable aspect of this campaign has been an attempt to discredit the conservation and development policies of Zimbabwe (see Appendix 1, 'A Brief History of the HSUS Campaign Against the Concept of Sustainable Use and Zimbabwe's Conservation Policies', for details). More specifically, over the last year this has focused on attempts to disrupt and discredit CAMPFIRE.

HSUS have three objectives:

- prevent the down listing of the elephant at CITES.
- disrupt USAID funding of CAMPFIRE and similar CBNRM programmes
- discredit the concept of sustainable use and CBNRM

Having been unsuccessful in achieving their first objective they are now concentrating on securing the others.

HSUS strategy and activities
The activities of HSUS have been focused in the USA, where they have targeted the media, the US Congress and Administration, conservation and development NGOs and potential donors. **Whilst the campaign is ostensibly targeted at CAMPFIRE, it has implications for all AID funded NRM programmes in Africa, affecting approximately US$70 million of development assistance to the region.** The campaign is characterized by the presentation of information that is frequently wrong, misleading and incomplete, as clearly illustrated in the CCG pamphlet 'A close look at the facts and fiction behind the HSUS 'anti-CAMPFIRE campaign' (see appendix 2).

HSUS are notorious for choosing one key campaigning issue every two years which they put the full force of their large and well funded ($36 million annually) organisation behind. This is also their primary fundraiser. CAMPFIRE has become this issue and a conservative estimate indicates that they have spent approx. $ 6-8 million on their campaign to date. They will of course be confident of recouping these costs through their fundraising campaign to 'save the elephant', (see appendix 3). **The general consensus amongst many in the US is that this is perhaps the largest 'animal rights conservation' campaign that has been witnessed to date.**

HSUS initially made 10 detailed accusations against CAMPFIRE, these can be summarised as follows:

1. CAMPFIRE subsidizes trophy hunting and promotes the resumption of the ivory trade using US taxpayer funds which threatens the extermination of the elephant.

2. CAMPFIRE and ART used tax payer funds to illegally lobby the US Congress on the ESA and CITES for resumption of the international commercial ivory trade.

3. 98% of USAID funds do not reach CAMPFIRE communities.

4. CAMPFIRE is not socially, ecologically or economically sustainable.

Media - Instigated by HSUS, 17 'anti-CAMPFIRE' editorials have been produced in politically strategic state newspapers (see appendix 4) and national TV and radio ads have been run (see appendix 5). These demand the end of tax payers dollars subsidising the slaughter of the elephant through CAMPFIRE. Whilst local papers have run negative articles, the larger dailies, which undertake appropriate research, have all reported positively on CAMPFIRE, with favorable articles appearing in approximately 20 national publications. Several tabloid 'investigative TV' programmes (eg. Hard Copy) have initiated research on CAMPFIRE/ART but have dropped the issue once determining the facts.

Congress - HSUS have initiated a huge campaign targeted at Congressional representatives. This has involved the mailing of dozens of negative CAMPFIRE publications to all 500 + Congressional offices, briefings with hundreds of Congressional officers, identification of Congressional 'champions', etc. By mobilising their 5 million members, and the millions of members of other animal rights organisations, they have instigated what has been characterized as 'the largest Congressional letter writing campaign ever witnessed on a foreign issue' (hundreds of thousands of protest letters).

US administration - Letters have been sent to the Secretary of Interior, the President's Environmental Advisor and the Administrator of USAID, leveling accusations at CAMPFIRE and also accusing CAMPFIRE implementors of 'working feverishly to undermine and destabilise management and policies of South Africa's National Parks Systems' (see appendix 6). They are in the process of gathering signatures for a protest petition to the President.

Potential donors - Efforts have also been made to disrupt other potential and ongoing donors to CBNRM initiatives in the SADC region, eg. The GEF.

Amongst a host of specific activities undertaken by HSUS - too numerous to detail here - has been an 'undercover investigation' of CAMPFIRE officials. This included comprehensive background checks, surveillance and investigation of Zimtrust Trustees and many staff members of the various implementing agencies.

ART strategies and activities

Over the last 9 months the ART Washington office has devoted approximately 90% of staff time and expenditure to assisting the southern African Embassies in addressing the HSUS campaign. An essential element has been the development of a core group of supporters who have been prepared to actively assist in combating the accusations leveled against CAMPFIRE. This has involved the following:

- the endorsement of approximately 50 leading conservation and development NGOs and leading academics
- development of key contacts within the media and distribution of regular press releases
- identification and coordination of inputs of a group of renowned academics
- development of a support base within the African American community
- coordination of activities of a core group of NGOs, notably WWF, AWF, WCS and IUCN, who have actively supported CAMPFIRE
- Congressional liaison activities to organise Congressional supporters
- briefings and liaison with key US administration personnel
- securing active support and coordinating inputs of a variety of 'grass-roots' activist US NGOs/agencies to counter HSUS letter writing campaign, eg. Fishermans Coalition, International Association of Fish and Wildlife Agencies.

Having developed a comprehensive support base and appropriate informational materials, ART

and the southern African Embassies have been able to coordinate the appropriate response from the appropriate quarter to much of the HSUS campaign, effectively counteracting what they have done.

The majority of efforts have been focused on the Congressional campaign to prevent the passage of amendments which would have eliminated the use of USAID funding. In this regard the impact of the HSUS campaign cannot be overstated. When it is considered that in US Congressional terms CAMPFIRE is an 'obscure' African development programme, with no budgetary significance and little political significance, it is extraordinary that we are now faced with a situation where **CAMPFIRE is known to every US Representative and will be debated at length on the floor of the House and Senate.**

The HSUS Congressional campaign has been effectively addressed through

- the organisation of a core group of members of Congress to support CAMPFIRE, enabling;
  - the establishment of an 'early warning system';
  - access to other Congressional offices; and
  - ensuring a cohesive and standard message be advocated
- the development of action plans to counter HSUS's activities on Capitol Hill, including;
  - development of and distribution of informational materials
  - 'Dear colleague' letters (see appendix 7, A-D)
  - Preparation of briefings and floor statements for Members
- coordination with NGOs, academics and embassies to deliver message
- briefings for and coordination of media to 'sensitize' congress
- development and distribution of legal arguments against the amendments.

The advise and assistance of the southern African Embassy lawyers, Bracewell and Patterson, has been essential in the successful Congressional campaign. Bracewell and Patterson are currently involved in a dialogue with HSUS with regards to potential legal action that various southern African organisations may take against them.

ART informational activities have also forced HSUS to dramatically alter their initial claims against CAMPFIRE, with their current accusations being confined to:

- CAMPFIRE supports trophy hunting and ivory trade using tax payers money
- US foreign aid should not be used to support consumptive use programmes.

Current status and long term impact
Strong bi-partisan support has been secured for CAMPFIRE and it is highly unlikely that the Fox/Miller appropriations amendment to disrupt funding that will be offered in early September will be successful (see appendix 8).

The long term impact of the HSUS campaign may well prove to be of great benefit to Southern Africas CBNRM initiatives, particularly CAMPFIRE, for a variety of reasons, including the following:

- the campaign has resulted in high level of awareness and understanding of CBNRM in the US that we could not have hoped to achieve 'unaided'
- a core group of Congressmen has emerged that are prepared to actively promote US

policies that will support CBNRM initiatives through trade promotion and diplomatic channels in addition to AID funding

- strong working relationships have been established with a variety of significant decision makers and influencers, ranging from NGOs to the media
- for the first time the US conservation community have publicly endorsed 'consumptive sustainable use' leading to increased public awareness of the distinction between 'animal rights' and conservation.
- The dishonest nature of the HSUS campaign has served to discredit them amongst many with whom they have worked in the past.

The general consensus amongst in the US is that the HSUS campaign would have been successful in reversing recent US policy shifts towards support for sustainable use conservation policies and away from preservationist approaches if it had not been for the response coordinated by the southern African Embassies and ART. In the short term this would have resulted in a loss of USAID funding to Southern Africa. The long term implications would have been even more dramatic, eg. The closure of markets for wildlife products.

Liz Rihoy
ART Washington

August 29 1997

Capital Notebook

Hunting the Elephant in AID's Budget

By Guy Gugliotta
Washington Post Staff Writer

Elephants are pretty neat. They're really big. They pick up stuff with their noses. They do fantastic tricks in the circus. Disney made a movie about one. Republicans love them.

Elephants are not as neat, however, when they're running wild in the neighborhood and break dancing in your cornfield. They've never heard of the macarena, and scarecrows don't work.

Elephants, said the Agency for International Development's Tony Prior, "take up a lot of ecological space."

Prior is AID's natural resources policy adviser for Africa and, among other things, oversees a $28 million investment in a project to help Zimbabwe improve the lot of rural people's living in elephant country.

Several years ago, the project ran afoul of the Humane Society of the United States, which makes the point— not denied by AID— that what rural people living in elephant country like best is to issue licenses so rich foreigners can come into the neighborhood and shoot elephants.

This is worth anywhere from $20,000 to $50,000 a pop, which can buy a lot of economic development in a drought-ridden southern African nation, and if it happens often enough, the cornfield problem is solved.

Unfortunately, notes the Humane Society, the African elephant is a "threatened" species under the U.S. Endangered Species Act and therefore not to be hunted. AID's program "is at odds with fundamental American values," said Teresa Telecky, director of the Humane Society's wildlife trade programs. "We don't give money for something we don't do here."

The Humane Society has never liked this project but has become more upset recently because AID is expanding it. AID spent $7 million in three Zimbabwean districts between 1989 and 1996 and now proposes to spend the rest (more than $20 million) in 23 districts between 1997 and 1999.

"The first part was a pilot for the very driest districts," Prior said. "The next phase is to mainstream." He carefully notes, however, that "this" is not just shooting elephants. "This is a resource management project, not a wildlife project."

Maybe so, but maybe not.

At this point, AID and the Humane Society pretty much agree on mechanics—but not on outcomes. AID thinks it is demonstrating to Zimbabweans that a properly managed environment is a renewable and lucrative resource. The Humane Society thinks AID is simply giving Zimbabweans an excuse to kill elephants.

AID dedicated $28 million to the project in 1989, the year when 130 nations overwhelmingly approved a ban on international trade in ivory. Hunting and poaching had halved Africa's elephant population to 600,000 during the previous decade.

AID contributes its money to the Zimbabwe government's Communal Areas Management Programme for Indigenous Resources (CAMPFIRE), which puts local people in charge of managing their own natural resources.

According to Prior, CAMPFIRE's goal is to get people to see wildlife and the environment as income sources from ecotourism, photo safaris and, yes, trophy hunting. "We want to make maintaining the wildlife population a matter of self-interest," Prior said.

An AID blurb brags that poaching in Zimbabwe has gone into "dramatic decline" since AID started contributing to CAMPFIRE, and that the country's elephant population has risen from 50,000 to 65,000.

The Humane Society suggests, however, that the ivory ban is what's helping the population—no ivory market, no poaching. One of the things that has the society going bonkers is that Zimbabwe has joined a minority of African nations calling for a lifting of the ban.

The AID blurb also acknowledges that 90 percent of CAMPFIRE revenue in 1995 came from hunting licenses, which, the Humane Society additionally points out, doesn't say much for photo safaris and camping.

And the Humane Society also quotes unflattering passages from an independent study of CAMPFIRE contracted by AID in 1995: District councils have ignored program directives, failed to invest revenue in village projects and taught people nothing about wildlife management, the study said.

"The result has been ignorance or hostility to the CAMPFIRE program," the study added, and "mistrust of councils, increasing intolerance of wildlife and a continued lack of communal environmental controls."

Prior does not apologize. Environmental projects take time to mature, he said, and AID is trying "to put in place the conditions for long-term change." Elephant hunting is not the problem, not with the threat of "30,000 elephants dying from drought."

JP 2/12/97

Environmentalists vs. Wildlife

By KARL HESS JR.

Southern Africa is facing an environmental crisis. On June 9, the source of that crisis arrives in Harare, Zimbabwe, with the opening of the 10th Conference of the Parties to the Convention on International Trade in Endangered Species of Wild Fauna and Flora (known as Cites). There, the fate of elephants will be debated and the lot of millions of poor farmers will be held in the balance.

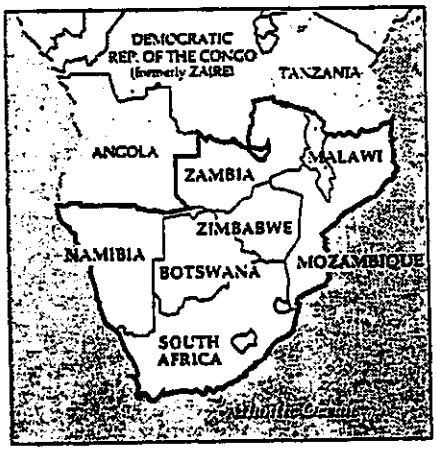
Two issues are at stake. The first is the ivory ban currently enforced by Cites. Zimbabwe, Namibia and Botswana, with the support of nine neighboring states, will ask for a limited resumption of the ivory trade. The second is trophy hunting of elephants. Animal-rights groups will push for an end to all hunting, counting on sympathies for Bambi to carry the day.

But there is something much larger at stake: a bold conservation initiative under way to win over rural villagers to elephant conservation. Begun in Zimbabwe in 1985 as the Communal Areas Management Program for Indigenous Resources (Campfire), it has—under the generic label of community-based conservation—spread to Botswana, Malawi, Namibia, Zambia, South Africa and Mozambique. Its idea is to give rural villagers an economic stake in putting up with wildlife and its costs—like crop loss and loss of human life and limb. It does so by giving small communities the right to market predetermined levels of elephant and other big game to safari companies and keep the revenues. And it works: $12,000 per elephant is a lot of money for a village where household income is $300 a year.

In Zimbabwe, for example, poaching is down and the number of elephants killed annually to protect crops and human lives has fallen from 300 to fewer than 30, allowing annual trophy kills to rise to more than 100 from 50. At the same time, elephant numbers have soared to 66,000 from 46,000 since 1980, making Zimbabwe one of the world's prime elephant producers. Much the same has happened in other nations with programs like Campfire.

Cites threatens Campfire in two ways. First, its ivory ban punishes the good managers of elephants—the Campfire nations—for the failure of other countries in Africa and Asia to adequately protect their elephants. At this moment, 33 tons of ivory sit in warehouses in Zimbabwe alone. Gradual sale of that ivory could more than double Campfire revenues, yielding even stronger incentives for villagers to protect both elephants and elephant habitat. Indeed, a recent study sponsored by the World Wildlife Fund, the U.S. Fish and Wildlife Service, the World Conservation Union, the Species Survival Commission and Traffic, a group that tracks illegal sale of animal parts, concludes that the ivory ban has had at best a minimal effect on elephant poaching. Even with a total ivory ban, global elephant numbers will fall as humans usurp more and more elephant habitat—a trend Campfire could help stem.

This is where the Cites membership—135 countries, including those of Southern Africa and Europe as well as the U.S.—actually threaten to hasten the extinction of



elephants, and to keep rural villagers in poverty. If animal-rights groups—led by the U.S.-based Humane Society—are successful in their bid to outlaw trophy hunting of elephants (either through Cites or through the U.S. Endangered Species Act), Campfire will be snuffed out. Fully 90% of village Campfire revenues come from trophy hunting, and 65% of those come from elephants. Moreover, most African trophy hunters come from the U.S. Take them and the income they provide away and Campfire dies—and with it the economic incentives needed to persuade poor farmers to share their meager landholdings with elephants.

The U.S. should stand up for Southern Africa and support limited resumption of the ivory trade. Vice President Al Gore should stand up for the millions of Africans who benefit from Campfire-type programs. Environmentalists should stand up for the promise that Campfire holds for elephants. But they won't. Those who do stand up for Campfire—the Congressional Black Caucus, conservation biologists, and a handful of libertarian-minded think tanks—will remain voices in the wilderness.

A month ago on this page, Julian Simon tendered a bet "to any prominent doomsayer that just about any trend pertaining to material human welfare [anywhere in the world] will improve rather than get worse." I am neither prominent nor a doomsayer, but I am convinced that material human welfare—not to mention elephant welfare—will worsen in rural Southern Africa, as a result of U.S. and European wildlife policies.

It is not in the interest of politicians in either the U.S. or Europe to save elephants, especially when doing so risks the backlash of voters who see African wildlife only on TV. The problem is a widening cultural divide. Elephants are marvels to us; to Africa's struggling poor they are marauding pests. Elephants are cheap to us, costing only the price of the Discovery Channel; they are dear to the African farmer who must pay for land set-asides for wildlife parks and for lost crops, and who face loss of life. Witness also the rise of wildlife protectionism in developed nations and its equation of human and animal rights. In a subcontinent where human rights are barely respected, demands that wildlife be given even greater rights smacks of racism and imperialism.

I am prepared to take up Mr. Simon's bet, but not because I think his argument is wrong. The world-wide environment is improving, and it will continue to improve so long as people are free to control where they live and to benefit from the market process. But those conditions do not hold in Southern Africa. So I leave to Mr. Simon the terms of the bet, a bet I will work to lose, and one that I will gladly pay off.

Mr. Hess is a senior associate of the Thoreau Institute in Portland, Ore.

CEI Update

Save Elephants - Buy Ivory

Michael De Alessi
August 1997

This message has been muffled for quite sometime, but it was trumpeted loud and clear at the close of the 10th meeting of the Convention on International Trade in Endangered Species (CITES) in Harare.

The decisive moment came on June 19 when proposals by Botswana, Namibia and Zimbabwe for a limited resumption of the ivory trade passed with the required two-thirds majority, despite strong opposition from the U.S. and some European delegations. With the tally of the last vote, many Africans in the auditorium broke into song, while dejected animal rights advocates tried to come to terms with a rare CITES defeat.

They had better get used to it. This vote is just the beginning of a sea change in the way that the developed world manages its resources.

For the first time in recent CITES memory, countries like the U.S. and the United Kingdom and their shrill, preservationist allies did not carry the day. These countries were influential in the 1989 CITES decision to ban the ivory trade. They claimed that devaluing elephants was the way to save them and promised to make up lost revenues with donor aid. But over the last eight years, many countries, particularly developing nations, have come to understand the insidious nature of these protectionist approaches to conservation.

Delegates from some these countries expressed their concerns on the floor of the meeting that these measures were simply attempts to turn their countries into "natural history museums" for wealthy environmentalists and that foreign aid only served to keep them "poor and mendicant."

The greatest threats to elephants is habitat loss. Making them less valuable may discourage some poaching, but by encouraging habitat destruction, this devaluation has surely harmed elephant populations. Countries like Zimbabwe with its CAMPFIRE program are realizing that the greatest incentive to protect habitat comes from allowing local people to benefit from the wildlife that surrounds them. In this case, devaluing elephants only means less effort will be put into providing space for them.

The resulting vote on a limited trade in ivory is indicative of a dramatic shift taking place on the international conservation scene. The consensus on wildlife conservation is shifting, and developing countries are finally beginning to work together to push for sustainable utilization of wildlife resources to both benefit and empower impoverished communities and nations.

Of course, CITES still has a long way to go. Norway proposed trade in its minke whale stocks, Cuba in hawksbill sea turtles, and Japan in both minke and gray whale populations. Each failed, in spite of evidence that none of these species are endangered. The Norwegian and Cuban proposals came close -- majority support,

but not the required two-thirds. But for these species, the political machinations of countries like the U.S. and the U.K. were more successful.

U.S. animosity toward Cuba is well known, and the whale proposals were likely scuttled by the advice of the International whaling Commission (IWC), which is today almost wholly divorced from conservation. The IWC routinely ignores its own rigorous scientific assessments. Member countries like the U.K., Australia, and New Zealand have publicly stated that they oppose whaling under any circumstances. Few of the developing nations that are beginning to transform CITES belong to the IWC, and so the IWC remains dominated by such animal rights views.

The increasingly marginalized and out-of-touch views of the United States were evident in its comments on the South African white rhino proposal, which failed to win the necessary approval by only two votes. South Africa sought merely to open a dialogue with some Asian countries on the topic of a potential trade in rhino horn. Rhino horn is popular in some countries, most notably China, as a medicinal remedy for fevers and other ailments.

CITES has always had little or no effect on traditional and medicinal demand, and as expected, rhino horn is as popular as ever in many Asian countries. In fact, the CITES ban has only served to increase the price of rhino horn, and therefore, the reward for poaching. Nevertheless, the U.S. opposed South Africa because "the effort . . .to reduce the demand for rhino horn may be undermined by this proposal."

This position underscores exactly what is *wrong* with CITES -- the assumption that trade and conservation are diametrically opposed, unless proven otherwise. In fact, the opposite should be the guideline for CITES, and the southern white rhino is case in point. Whittled down to a population of nearly 20 by the turn of the century, the South African white rhino population now numbers over 7,500.

In a recent study for the Institute of Economic Affairs in London, South African economist Michael□t Sas Rolfes points out that the Natal Parks Board, which has been largely responsible for this remarkable recovery, demonstrates the efficacy of commercial use and management. The revenues generated from the sale of hunting concessions and live animals create a considerable incentive to conserve and propagate the rhino.

Unfortunately, this is one of the few examples of good government game management, and it is only because the Parks Board is relatively autonomous, so it behaves more like a private owner. The fundamental importance of secure tenure to wildlife conservation is, sadly, all but lost on the great majority of CITES participants, who all too often fail to understand the relationship between ownership and conservation.

Private conservators saved the South African bontebuck, the American bison, and countless other species that were wiped out on public lands, but dearly protected on private ones. And just as one might expect, the healthiest elephant populations tend to be in those countries that are turning to more and more local control over wildlife. The stronger these tenure systems are, the more wildlife, endangered or not, will benefit from trade and be fiercely protected.

After last month□s CITES decision, all eyes will be on Botswana, Namibia and Zimbabwe, not only to see how they handle this trade, but to see how well they reward these local communities for their on-the-ground conservation work. If and when they do, and the world takes note, *that* will be the really dramatic turning point in international conservation. For until the CITES bias against trade is reconciled with the positive effects of private ownership on trade and conservation, it will continue to

THE LIBERTARIAN PARTY

The Party of Principle

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NEWS FROM THE LIBERTARIAN PARTY
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Libertarians demand: Congress should kill program that subsidizes the slaughter of African elephants

WASHINGTON, DC -- Hundreds of majestic African elephants are being killed every year by trophy hunters -- and U.S. tax dollars are helping to pay for the slaughter.

"This is an outrage that must be stopped," said Steve Dasbach, national chairman of the Libertarian Party. "Congress has already spent millions to promote this wildlife butchery, and if we don't stop the politicians, they're going to spend $21 million more."

The U.S. House could decide as early as Tuesday whether to continue funding CAMPFIRE -- ã foreign aid program that funnels money to Zimbabwe to promote big game hunting.

The CAMPFIRE program (Communal Areas Management Program for Indigenous Resources) subsidizes the hunting of elephants -- as well as leopards, lions, baboons, hippos, and zebras.

"Your tax dollars are being turned into the bullets that are killing these magnificent animals," said Dasbach. "That's why the Libertarian Party has joined with the Humane Society of the United States to oppose the program -- and demand that CAMPFIRE be doused. We need to stop the politicians before they kill again."

Congress already has funneled $7 million into this program through the U.S. Agency for International Development, and the agency is now requesting $21 million more -- despite the fact that elephants are considered an endangered species, and 29 African nations have outlawed elephant hunting.

The CAMPFIRE program uses American taxpayers' money to pay for advertising to lure wealthy European "trophy" hunters to Zimbabwe, where they spend up to $30,000 for a license to kill a bull elephant.

"Critics of foreign aid, take note: Politicians are using your tax money to persuade wealthy Europeans to go on an elephant-hunting safari in Africa," Dasbach said. "How can they justify that? How can a single American benefit from this?"

In fact, a vast majority of Americans -- 84% -- oppose trophy hunting because they believe it's cruel to the animal, according to a nationwide poll taken last December by Penn & Sheehan.

"And it's cruel to American taxpayers as well, because they're forced to fund the killing of these animals with their tax dollars," said Dasbach.

CAMPFIRE also spends hundreds of thousands of American dollars every year lobbying to overturn the international ban on ivory sales, and to remove African elephants from the list of endangered species.

"Consider the irony," said Dasbach: "American environmentalists are getting their tax dollars taken by politicians, who then spend it to encourage the slaughter of an endangered species."

The Libertarian Party's opposition to the CAMPFIRE program doesn't mean that Libertarians are opposed to hunting, said Dasbach.

"We are 100% in support of people's right to hunt. It's a popular sport, and is frequently necessary to thin the herd and prevent animal starvation," he said. "Individuals have every right to hunt on their property, here or abroad. But they also have a right not to be forced to subsidize someone else's hunting."

Perhaps the most amazing thing about the taxpayer-financed elephant massacre, Dasbach said, is that the CAMPFIRE program has been supported by so-called environmentalists like Bill Clinton.

"When will the environmental alarmists who wag their fingers about spotted owls and tree frogs show some concern about the slaughter of elephants that they are aiding and abetting in Africa?" he asked.

"The CAMPFIRE program presents a perfect opportunity for the president and Congress to do a little trophy hunting of their own: Hunt down and kill this deplorable program -- and stop using U.S. taxpayers' money to subsidize the slaughter of African elephants."

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Animal rights activists peddling 'junk science'

December 18, 1997
by Absalom Shigwedha

Windhoek - Wildlife organisations have dismissed claims that the poaching of elephants has increased in the wake of the decision by the Convention on International Trade in Endangered Species (Cites) to allow limited trade in ivory.

Both the Wildlife and Environment Society (WES) of South Africa and Zimbabwe's Africa Resources Trust (ZART) say they have been closely monitoring the effects of the Cites decision, and that there has been no measurable increase in elephant poaching so far.

At its 10th conference in Harare in June, Cites decided to downlist the African elephant to its appendix two, which allows for limited trade in ivory.

Dr Bruce Davidson, who is a board member of WES, said his organisation was extremely surprised to see reports in the media to the effect that poaching levels had escalated since the Cites decision in June.

"With our partners we have been investigating every (poaching) claim of which we have been made aware, many of which are at best only anecdotal, and it appears that poaching levels may prove to be lower than they were before Cites," Dr Davidson said.

According to Davidson, the biggest threat to the elephant at the moment was animal activist groups and their "irresponsible reporting".

"By falsely proclaiming world-wide that there is a renewed ivory trade and that there was once more an incentive to poach elephants, they are making it much more likely that elephant will indeed come under pressure from Africa's rural poor," he argued.

Davidson said the campaign by animal rights organisations was selfishly calculated to achieve the aim of placing the elephant population of Namibia, Botswana and Zimbabwe back on Appendix I of Cites, while conveniently ignores the facts.

Cites's decision to downlist the African elephant to Appendix II was a prelude to the resumption of controlled ivory trade which, once certain conditions of control are met, and provided that there is no escalation in elephant poaching, could resume on a limited scale by mid-1999.

Cites's Appendix I lists a group of endangered species which cannot be killed for commercial gain. The African elephant was placed on on Appendix I in 1989, after it was discovered that elephants across the continent were fast disappearing as a result of poaching.

Meanwhile ZART General-Secretary Rob Monro said allegations that poaching was increasing in Africa was a campaign "based on junk science". He said the only real measure of the effects of the Cites' decision to consider a retum to a legal, well regulated ivory trade was the work of Traffic, the

official monitor for Cites. "And they can find no evidence of an upswing in poaching," he said.

- Recently, International Fund for Animal Welfare (IFAW) alleged that there was an elephant "massacre" taking place in Kenya, with a total of 29 elephants poached during September alone. The Kenyan Wildlife Service has officially denied the claims.

- The London-based Environmental Investigation Agency was also singled out as one of the animal protection groups telling the world that poaching was on the increase place in Africa.

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[redacted]

June 20, 1997

U.N. wildlife panel eases ban on ivory sales

By PAUL ALEXANDER Associated Press Writer

HARARE, Zimbabwe -- A U.N. wildlife panel eased the worldwide ban on ivory Thursday, allowing three African countries to sell 59 tons of stockpiled elephant tusks to Japan. Supporters burst into a chorus of "God Bless Africa."

Backers saw the decision as a victory for self-determination and a reward for the conservation efforts of Botswana, Namibia and Zimbabwe since the ban took effect 7 1/2 years ago.

"This is a triumph for sanity, objectivity and for recognizing developing countries' ability to take their own decisions on natural resource management," said Dick Pitman of the Zambezi Society of Zimbabwe. "It's a major, major achievement."

Ivory trade supporters cheered and sang when the results were announced; animal rights activists sat in glum silence. They said any relaxation would spark resumed elephant slaughters by poachers.

"It sends a strong signals to poachers across Africa that it's a good time to start killing elephants again," said Isabel McCrea of Greenpeace.

The first of three secret ballots on proposals by the three countries cleared the 138-nation U.N. Convention on Trade in Endangered Species on a 74-21 vote, with 24 abstentions.

The other two passed by almost identical margins -- well over the two-thirds majority required to downgrade the protection afforded the elephants under international law.

The proposals had been rejected Tuesday, but a committee was then set up to amend them to ensure illegal ivory is not mixed in with legal shipments.

The ivory sale can go ahead in 18 months, if promised controls are deemed in place by then. Botswana, Namibia and Zimbabwe wanted to sell combined ivory stocks of more than 150 tons to Japan but agreed to the smaller amount.

Western countries have strongly opposed lifting restrictions on ivory but some developing countries say they have more elephants than their land can support.

Don Barry, head of the U.S. delegation, said he voted against the proposals but would cooperate with the three countries to ensure trade is properly managed.

"For the sake of the African elephant, we can't afford to fail," he said.

Ginette Hemley, head of the World Wildlife Fund delegation, said the issue might not have gone this far if Western countries had come up with promised

contributions for elephant conservation.

"We are extremely disappointed and fearful for the future of the elephant throughout Africa," said Wayne Pacelle of the Humane Society of the United States.

The ivory decision came a day after delegates imposed restrictions on trade in sturgeon and caviar but rejected easing controls on rhinoceros horn. South Africa, which initiated the rhino proposal, saw it defeated a second time Thursday.

The body also rejected, for the third straight meeting, a proposal by the United States and Bolivia to increase protection for big-leaf mahogany trees.

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Groups Assail U.S. Funding of Zimbabwe's CAMPFIRE Program

Animal rights organization in the United States have launched an aggressive campaign against US funding of Zimbabwe's CAMPFIRE program.

CAMPFIRE (an acronym for "Communal Areas Management Programme for Indigenous Resources") is a rural development program that shifts authority for wildlife management to local districts and communities, especially those near parks and on marginal agricultural lands. The program, first implemented in 1989 in remote regions of northern Zimbabwe, provides villagers with opportunities to generate revenue through various wildlife-related industries. About 90% of the revenues generated by CAMPFIRE districts in 1995 were derived from leasing sport hunting concessions to commercial safari operators, according to the US Agency for International Development (USAID).

The Humane Society of the United States (HSUS) is leading the anti-CAMPFIRE effort. It will soon release a new document entitled, "Ten Reasons Why U.S. Funding for CAMPFIRE Should Stop."

"CAMPFIRE is far from the social and conservation panacea it is proclaimed to be by those involved in the project. Indeed, it is a failure in many important areas and a waste of American taxpayer dollars," declares a draft of the HSUS document.

Between 1989 and 1994, USAID contributed $7.6 million to the CAMPFIRE program. USAID will contribute an additional $20.5 million through 1999.

"How can CAMPFIRE ever be economically sustainable when it is so heavily subsidized?" asks Teresa Telecky, Director of HSUS's Wildlife Trade Program.

In its forthcoming document, the Humane Society alleges that some of the organizations that implement CAMPFIRE may be using USAID money to lobby against the existing ivory trade ban.

Tony Pryor, a natural resource policy advisor in the Africa Bureau at USAID, denies that any USAID money is being used for that purpose. He told *African Wildlife Update* in late September that "U.S. policy is clear in that regard. USAID funds cannot be used for lobbying. We might not always agree with the lobbying entity of a funded organization. But the entity must keep an airtight seal between the lobbying part and other activities. Keep in mind that CAMPFIRE officials are free to talk about sustainable use and their point of view--that's not lobbying."

In Zimbabwe, the Director of Africa Resources Trust, Jon Hutton, called the HSUS campaign against CAMPFIRE "entirely predictable from an organization that places the value of an animal above that of our impoverished rural people. The Humane Society's new attack, like their previous ones, is full of errors and inaccuracies to such a degree that one has to assume their intention is to mislead. Let's not forget the Humane Society is interested neither in conservation nor people."

According to USAID documents, interest in the CAMPFIRE program is growing in Zimbabwe, with the number of participating households increasing from 9,000 in 1989 to about 103,000 in 1996. Non-hunting tourism to CAMPFIRE Districts is also on the rise, according to USAID, which cites as evidence the development of the Sanyati Bridge Camp in Hurungwe District and "additional development at Mavhuradhona Wilderness Area...,

where the introduction of a variety of wildlife species enhanced the popularity and success of the area's horseback photo safari operation."

HSUS officials are not impressed. "Communities would have benefited much more if USAID had given the money directly to them rather than to a group of Zimbabwean non-governmental organizations... who implement the program," said HSUS's Telecky.

USAID's Pryor says HSUS is missing the point.

"It's an issue of institutional development and empowerment. It's not simply an issue of, 'Why don't we just take the money and divvy it out to people...' That's not sustainable. We're trying to put in place better institutions so they can make sensible and qualified decisions at both the community and national levels," Pryor said.

The growing debate on U.S. funding of CAMPFIRE comes as Zimbabwe begins the process of seeking permission to sell 33 tons of its stockpiled ivory. According to press reports, Zimbabwe submitted a "draft proposal" for the ivory sale to the CITES Secretariat in mid-August. The proposal is likely to be debated at the next CITES meeting, which will be held in Zimbabwe in June 1997.

Zimbabwe says it needs the income from ivory sales to fund wildlife conservation in the country and, according to one report, "to compensate people in poor rural communities who are sometimes attacked by elephants and whose crops are regularly damaged by the huge beasts."

Officials from Zimbabwe's Department of National Parks and Wildlife Management have said the stockpiled ivory they want to sell is from culled or rogue elephants and not from poached elephants.

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Rumours Of Poaching Increasing Denied In Harare

December 15, 1997

HARARE, Zimbabwe (PANA) - Conservation authorities in Southern Africa have vehemently denied that six months after being allowed limited sale of elephant tusks, the largest land-based mammal was being threatened by poachers.

Conservationists in Southern Africa Sunday refuted claims that there has been an increase in poaching in the region since the decision by the Convention on International Trade in Endangered species (CITES) to downlist the African elephant in June.

The Zimbabwe Trust and the Wildlife Environment Society of South Africa said in separate statements there had not been any measurable increase in elephant poaching so far while in some areas it had gone down.

At the June conference of parties to CITES, the African elephant was downlisted from appendix I, where trade is banned to appendix II where controlled trade is allowed.

Conditions were set under which Botswana, Namibia and Zimbabwe could resume controlled but strictly limited trade in ivory by 1999 provided there was no increase in poaching activities.

Many animal rights groups, which heavily fought the downlisting, have published materials claiming that there was an increase in poaching activities in the past six months.

In Sunday's denial, Zimbabwe Trust secretary general Rob Monro claimed that TRAFFIC, the official monitor for decisions made by CITES, had not found any evidence of the purported increase in poaching.

"As far as we can see in some places, the rate of poaching actually fell over the past six months...If poaching is going to escalate now, we will be inclined to blame those who claim now

that it is on the increase," Monro said.

The UK-based International Fund for Animal Welfare reported recently that a total of 29 elephants had been poached in Kenya, one of the countries initially opposed to the downlisting of elephants.

But the Kenya Wildlife Society has refuted this, saying poaching had actually gone down compared to the previous four years.

Statistics showed that in 1992, 97 elephants were killed either for meat or ivory, 124 in 1993, 97 in 1994, 47 in 1995, 76 in 1996, and so far this year 53.

Wildlife and Environment Society board member Bruce Davidson said the allegations of increased poaching were surprising as it appeared that poaching levels may even be lower since the CITES decision was made.

"By falsely proclaiming worldwide that there is renewed ivory trade and that there in an incentive to poach elephants, they are making it much more likely that elephants will indeed come under pressure from Africa's rural poor," Davidson said.

The European Union has already voted to follow the CITES decision by incorporating the regulations set on trade in elephant products in the European law.

It will therefore be possible for commercial shipments of elephant hides and personal tourist items of leather and ivory to be made from Botswana, Namibia and Zimbabwe to enter Europe beginning the end of the year.

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US News and World Report - Nov 25, 1996

WORLD REPORT

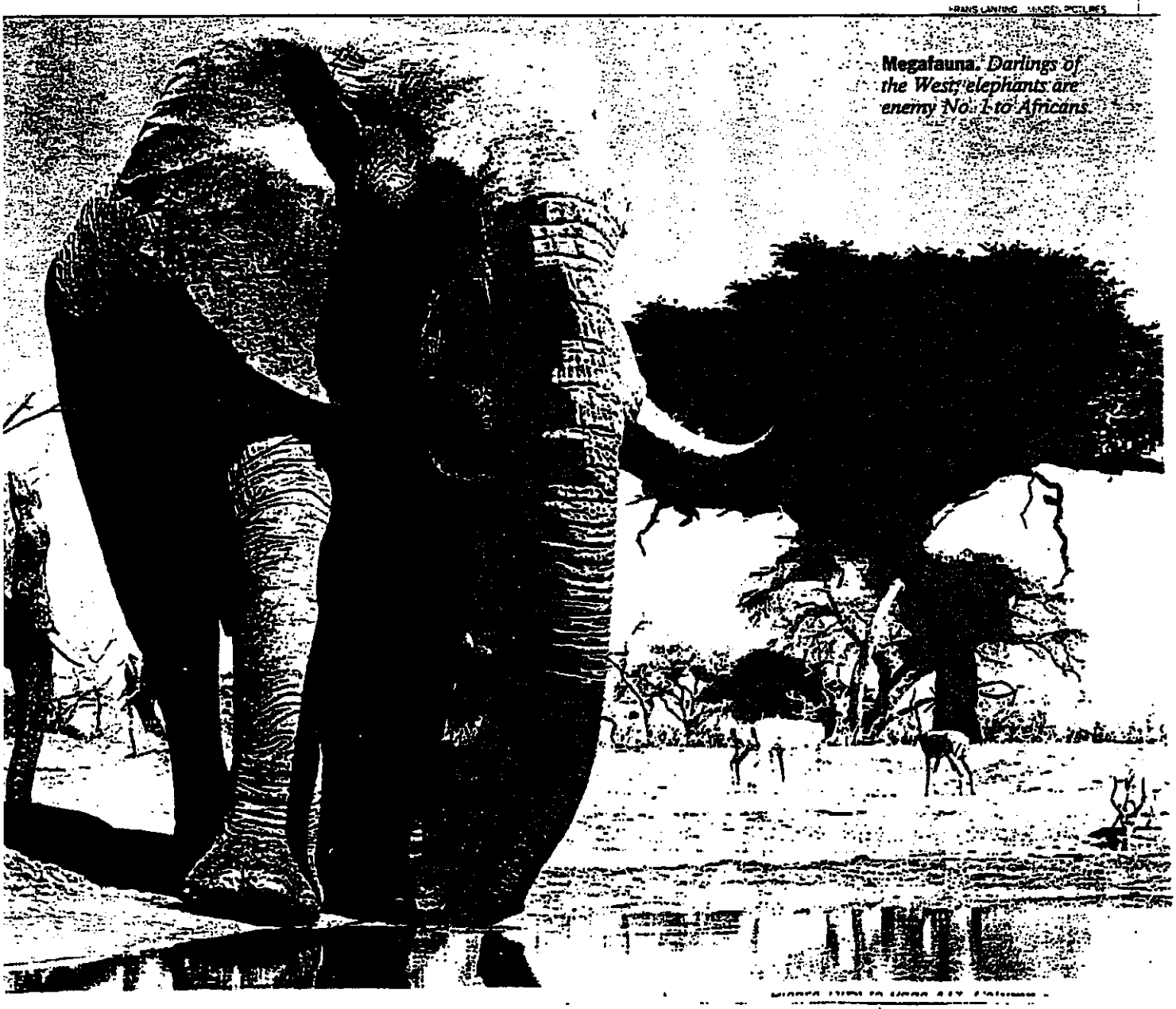
Killing with kindness

Preserving wildlife has been a moral and practical disaster for the developing world. The paradoxical solution: Use it or lose it

Traditional recipe for creating a picture-book African wilderness: Massacre the natives; introduce smallpox to kill off some more; let tsetse fly spread and wipe out the cattle; declare what's left a park; shoot any poachers. An image of teeming wildlands in far-off tropic climes has long seized the imaginations of affluent nature lovers in affluent lands; with the ascendancy of global biodiversity as issue No. 1 on the environmental agenda, safeguarding that image has become a major focus of fund-raising campaigns and legal initiatives.

But it is an image awash in ironies, not least that a land teeming with wildlife, untrammeled by man, is a modern colonial invention—an anachronism created by brutal force and alien to anything nature had known for thousands of years. The famous game parks of Kenya, for one, arose on the centuries-old homelands of the cattle-herding Masai after they were weakened by disease and driven out by colonial law.

As a policy, preservation is a deeply flawed anachronism at that. In parks and reserves around the world, scrupulously



Megafauna. *Darlings of the West, elephants are enemy No. 1 to Africans.*

gether or modified to allow limited ivory exports from countries with large herds.

The highly charged issue will dominate the agenda next June when the 133 member nations of CITES meet for their biennial conference. The meeting will be held, coincidentally, in Zimbabwe, one of Africa's strongest advocates for resumed ivory trading. With about 70,000 elephants—more than twice the carrying capacity in a country the size of California—and with 45 tons of ivory locked in a government warehouse, Zimbabwe badly wants to find a market for its trove of white gold.

Estimates of stockpiled ivory across the continent range from 500 to 600 tons, perhaps more. For nations mired in poverty, that represents a vast, untapped source of revenue that could underwrite rural development, habitat acquisition and wildlife protection. It also could be siphoned off into the pockets of corrupt bureaucrats. Thus one idea being floated by the World Wildlife Fund is a debt-for-ivory swap in which Western governments would write off a portion of a nation's indebtedness in return for destruction of its stockpiled tusks.

Western animal-protection groups are preparing to mount massive opposition to renewed ivory trading. The Humane Society of the United States, which has launched a $2.5 million elephant contraception experiment in South Africa's Kruger National Park, says that culling and hunting are unnecessary. Believes the society's John Grandy: "Birth control is a humane alternative for African nations who make money from devastating their wildlife, a way for them to embrace compassion."

Ecoimperialism. This sentiment infuriates Africans eager to use their wildlife like any other natural resource, be it timber, copper or diamonds. "Why should our people beg and starve while we are sitting on a stack of ivory worth tens of millions of dollars?" asks Graham Child, an internationally known wildlife scientist in Zimbabwe. Says Botswanan President Masire: "It is environmental imperialism. Let us manage our own resources without interference from the West."

The same ecoimperialism charge is leveled against the United States by Botswana, Zimbabwe, Malawi and Namibia in a related controversy. Together with the 35,000-member Safari Club International, the world's largest big-game-hunting organization, the four southern African nations have petitioned the United States to amend its Endangered Species Act. The law forbids American hunters to bring home trophies of animals the ESA deems threatened or endangered—even though CITES allows limited hunting of some of these species in specific countries.

Big-game hunters typically spend between $20,000 and $60,000 for a safari. Denying them trophy import permits, they argue, is a restraint of trade that costs African nations millions of dollars a year. In South Africa's Pilanesburg National Park not long ago, for example, three very rare black rhinoceros bulls, past breeding age, were approaching the end. SCI members offered up to $250,000 each to shoot them and bring home the trophies. The law, not common sense, prevailed, and the rhinos ended up as hyena food. Likewise, hundreds of cheetahs are killed each year across southern Africa as livestock pests: SCI lobbyist and former Montana congressman Ron Marlenee says the U.S. species protection act actually hampers efforts to provide incentives to rural Africans to halt poaching, to stop converting prime wildlife habitat to livestock pasture and to quit killing the sleek cats that prey on their animals. "If cheetahs killed as pests were instead worth $5,000 apiece to local people, they'd feed their cattle and hogs to them," Marlenee argues.

Some prominent conservationists, like elephant researcher Cynthia Moss, argue that Africa's big game should be protected for its intrinsic worth. Others insist that wildlife must pay its way if it is to survive outside zoos and safari parks. "The protectionist mentality is irrelevant today," believes Hector Magome, manager of planning and development for the South Africa Parks Board. "Wildlife must be used to reduce poverty; otherwise we will lose the parks." The government, he notes, is under tremendous pressure from land-poor South Africans to carve up New Jersey-size Kruger National Park for farms and homesteads. Wildlife officials in southern Africa calculate that managing wildlife on marginal lands can produce twice as much revenue as cattle ranching.

Programs like Zimbabwe's CAMPFIRE, which began in earnest about eight years ago, are a promising start. CAMPFIRE generates $2.5 million a year, 90 percent of that from sport hunting. The money is shared by about 600,000 people living on communal lands.

CAMPFIRE is dependent on a 10-year, $27 million U.S. Agency for International Development grant for administration, training and infrastructure that began in 1990. Though emulated in other countries, the program has recently been tainted by charges of poor management and corruption in some areas of Zimbabwe. Sustainable-use proponents consider it a model for community development despite the blemishes. Opponents say CAMPFIRE is nothing more than U.S. tax dollars subsidizing wealthy trophy hunters.

For Phineas Uketi and his fellow villagers, such controversy is an abstraction. They point out that last year, the 681 households in Mahenya each received a cash payout of 240 Zimbabwean dollars. That's about $25, a significant sum in a subsistence economy in which $100 to $150 is the average annual household income. Revenues from the program, which began in Mahenya in 1992, also have purchased the village two grinding mills and a water line and have built a small school.

CAMPFIRE has brought the villagers of Mahenya full circle. Davison Msimbini says his people once hated nearby Gonarezhou Park because they were forced off the land 30 years ago to create the preserve and were forbidden to hunt the animals that had sustained them for centuries. "Now we use the skills and knowledge of our elders to conserve wildlife as they once did," he says. "Once again, animals are part of our livelihood." ■

Rampage. *A baobab tree destroyed by elephants*

BY MICHAEL SATCHELL IN KENYA, ZIMBABWE AND SOUTH AFRICA

APPENDIX K

DISTRIBUTION OF CAMPFIRE REVENUES IN RDCS VISITED BY EVALUATION TEAM

Distribution of Wildlife Funds, Examples from Wards Visited by Evaluation Team

There is a great deal a variation on how dividends are distributed within RDCs. In some cases these are distributed to wards, in some cases to villages within wards where animals were killed. We did not see a case where dividends were distributed directly to households. This is now rare, with most people preferring to aggregate their funds at a village or ward level to make possible projects of community interest.

Tayanda Ward Wildlife Project (one of Nyaminyami Wards) (Mala Ward #4)

This wildlife rich district has been plowing its dividends into income generating activities (grinding mills), whose income is expected to reach about 17% of that provided by the wildlife dividends received next year. The ward hopes that their elephant dung paper project, and community store, will further increase this percentage. Expenditures of ward funds are expected to benefit a broad range of community members. (Note: Remember that most dollar figures refer to Zimbabwe Dollars; exchange rate in 1998 was about U$ 1.00 - $15 Zimbabwe).

	Actual 97-98	Projected 98-99
Income:		
Marembera Grinding Mill	$24,780	$36,000
Moyuhi Grinding Mill	$14,690	$24,000
New Grinding Mill		$24,000
Sub-Total	$39,470	$84,000
Ward Dividends (50%)	$353,136	$500,169
Problem Animal Cont.Meat	0	$20,000
Loan (from RDC)	0	$50,000
Ward Tuckshop (groceries)	0	$210,000
Elephant Dung Paper Sales	0	$205,000
Total		$1,153,169 (US$ 76,877)
Expenditures (Planned):		
Pre-Schools	0	NA
Youth Projects	0	
Women's Clubs	0	
Pre-School Tutors	0	
Pre-School Toilets	0	
Drought Relief	0	
Loan Funds	0	
Paper Making Project (Elephant Dung)		
Fencing around Area	0	$15,000
Wages/Salaries		$10,000

Staff:

Bookkeeping	7,200	14,400
Six Game Scouts	21,600	43,200
Grinding Mill Workers	14,400	43,200

1996 Wildlife Fees:

Elephant	$3000
Buffalo (M)	$450
Kudu	$180
Bushbuck	$135
Buffalo (F)	$225
Duiker	$33
Waterbuck	$300
Impala $30	
Zebra	$240
Sable	$540
Grysbok	$30
Baboon	$6

Ny Amabishi Ward Wildlife Project (one of the Nyaminyami Wards

The evaluation team met with members of the CAMPFIRE ward committee. In this district, 11 of 12 wards are in participating in CAMPFIRE. Note that in example below, no funds are distributed to households. Last year's expenditures were similar to those projected for the coming year. A very large meeting of village representatives at the ward level decided upon these categories for expenses for the coming year.

Budget for 1998 - 1999

Income :

Balance Forward (in bank):	$1,342.72	
Expected Ward Dividends:	$105,000	(representing their 50% of take)
Grinding Mill Rental Fee:	$10,800	
Total:	$117,142.72	(US$ 7,899.47) (US$1 = 15Z$)

Ward Expenses Budgeted:

Millers Wages	4,800
Book-keepers Wages	7,000
Grinding Mill Repair and Maintenance:	7,000
DIP Tank	16,000
Gunguhive Primary School	15,000
Ward Annual General Meeting	2,000
Resource Monitor Wages:	9,600

Traveling & Subsistence Allowances:	8,000
Sitting Allowances (Meetings):	4,680
Stationary:	1,500
Game Scout Allowances:	6,000
Zunde Ramambo (Festival):	1,500
Independence Celebrations:	2,100
Pre-School Mothers	1,800
Youth Projects	8,000
Casual Wages:	3,000
Game Scout Uniforms:	6,000
Ward Wildlife committee Office:	5,000
Office Equipment:	6,400
Total:	$115,780
Balance:	$1,362.72

Nyaminyami Rural District: Nebire Ward #7

This Ward has a total of 190 households, with some 1,038 people.

A review of their game scout books at the ward level showed that careful attention is given to keeping track of the location and number of animals killed by sport hunters within their ward - the basis upon which their semi-annual paid dividends are paid by the RDC. We learned that:

Between June 10 - December 1997, animals shot were:

Buffalo	6
Impala 7	
Leopards	4
Kudu	2
Bush Buck	2
Baboon	2
Knipspringer	1

Between Jan. 1, and June 1997

Buffalo	5
Elephant	1
Baboon	1
Zebra	1
Impala 2	

Besides this, this ward received 34 culled impala, and 1 buffalo (for which a minimal price (US$ 0.33) was paid per kilogram). The RDC culls the animals and delivers them by truck to the ward

where a specially prepared metal grilled area has been set up within each ward where animals are hung and cut up, weighed, and sold to local people. When dividends are distributed by the RDCs, each ward will verify the 50% payment received against their own records, such as those above.

Beitbridge Rural District Council

Distribution of Wildlife Funds, 1995 Per Village/Ward (from the 1994 Hunting Year)

Though dividends are distributed by ward levels, in actual fact, within the Beitbridge RDC, it is the villages themselves which receive the payments. From their 1995 records, we were able to learn how revenue were distributed. It became evident that record keeping (archiving) is frequently a problem at the district level, as we were not able to obtain information for the 1995, 1996, or 1997 years, though dividends had been distributed for these years. It is interesting to note that communities count off-take of everything, for which a price is fixed, including baboons, monkeys, birds! It is important to note that this RDC did not deduct any overhead fees when revenue was very small, but gave 100% of dividends back to the communities!

1.	Chikwarakwara Village	Z$	Z$
	1 waterbuck	x 6000	= 6000
	3 (M) buffalo	x 9000	=22700 (1 PAC X 4700)
	1 genet	x 500	=500
	4 baboon	x 200	=800
	1 kudu	X 5000	=5000
	1 lion	X 9000	=9000 (as PAC)
	1 bushbuck	x 4000	=4000
	1 impala	x 1200	=1200
	1 civet	x 500	=500
	2 hyaena	x 4000	=8000
	2 vervet monkey	x 100	=200
	1 lilac breasted roller	x 100	=100
	Total:		76,000 (US $8,711)
2.	Chipise Village		
	1 kudu	x 5000	=5000
	4 buffalo (M)	x 9000	=31,700 (1 PAC x 4700)
	1 klipspringer (M)	x 3000	=3000
	4 baboon	x 200	=800
	Total:		40,500 (US$ 4,642)

3. Village # 19

1 bushbuck (M)	x 4000	=4000
1 impala (M)	X 1200	=1200
1 wild cat (M)	x 500	=500

Total: 5,700 (US$653)

Total Chipise Ward 1: 122,200 (US$ 14,007)

Dite 2

1. Dite Village

2 impala	x 1200	=2400
1 steenbok	x 1200	=1200

Total: 3,600

Mtetengwe Ward 6

1. Mtetengwe/Malala/Makakavhule

1 elephant (M)	x 72000	=72000
4 eland (M)	x 6000	=24000
4 impala (M)	x 1200	=4800
2 duiker (M)	x 1200	=2400
1 wild cat	x 500	=500
1 baboon	x 200	=200

Total: 103,900 (US$ 11,910)

Maramini Ward 8

1. Village #16

1 steenbok	x 1200	=1200
2 crocodile (M)	x 9000	=9000
Total:		19200

2. Maramai Village

1 impala (M)	x 1200	=1200
1 duiker (M)	x 1200	=1200
1 leopard (M)	x 7200	=7200 (as PAC)
1 hyaena (M)	x 4000	=4000
1 jackal	x 500	=500
Total:		14,100

3. Shashe Village

1 elephant (M)	x 72000	=72000
1 impala (M)	x 1200	=1200
1 mongoose (M)	x 100	=100
2 jackal (M)	x 500	=1000
Total:		74,300

4. Jalukanga Village

1 duiker	x 1200	=1200
2 springhare (M)	x 100	=200
Total:		1400
Maramani Ward Total:		109000 (US$ 12,494)

Machchuta Ward 9

1. Bili Village

1 duiker	x 1200	=1200
1 monkey	x 100	=100
Total:		1300

2. Sweriki Village

1 hornbill	x 100	=100
2 impala	x 1200	=2400
3 zebra	x 6000	=18000 (1 wounded)
1 steenbok	x 1200	=1200
1 baboon	x 200	=200
1 kudu	x 5000	=5000
2 lilac breasted roller	x 100	=200
Total:		27,100
Machchuta Ward Total:		29,600 (US$ 3,394)

Dendele Ward 10

1. Shobi Village

1 zebra	x 6000	=6000
1 jackal (M)	x 500	=500
Total:		6,500

SUMMARY DISTRIBUTION OF 1995 CAMPFIRE REVENUE

Ward	Gross	50% to Ward	15% Levy	35% Dev. Levy
Chipise Ward 1	122,200	61,100	18,330	42,770
Dite	3,600	3,600	-	-
Mtetengwe Ward 6	103,900	51,950	15,585	36,365
Maramani Ward 8	109,000	54,500	16,350	38,150
Machuchuta Ward 9	29,600	14,800	4,440	10,360
Shobi	6,500	6,500	-	-

1995 Safari Hunting Revenue: 446,800 (US$ 51,215)
Less Elephants not harvested: 72,000
Total For 1995 Distribution: 374,800 (US$ 42,962)

Net Distributions of Wildlife Funds Per Ward (1990 - 1994)

	< 1990	1990	1991	1992	1993	1994
Chipise	30,000	44,000	19,202	28,960	20,992	61,100
Dite II	0	0	20,000	29,500	0	3,600
Mtetengwe	0	0	15,000	23,600	38,400	51,950
Masera	5,000	0	0	9,100	0	6,500
Machuchuta	0	0	0	13,800	27,520	14,800
Maramani	5,000	1,000	27,127	53,000	30,848	54,500
SubTotal	40,000	45,000	81,329	157,960	117,760	192,450
RDC	6,000	5,235	18,671	67,040	138,240	183,350

APPENDIX L

ANNOTATED USAID SO1 RESULTS INDICATORS

Appendix L

Table _____

USAID/Z SO 1 Results Indicators

NRM II Results Name	Results Indicator	Data Sources	Year	Planned	Actual	Comments
SO 1.A:	Number of Campfire communities with established NRM programs	Campfire Assoc.(CA), Zimbabwe Trust (ZT)	1994			☛No baseline data ☛No specific criteria presented in R4 explaining how the indicator is actually measured. As it is defined, it is a *process*, not a purpose or results - level of measurement. It presumably is scored as CAMPFIRE "graduates", whatever that means. ☛Definition of "community" changed to "wards", whereas earlier strategy statements defines communities as "districts, wards or villages."
			1995			
			1996			
			1997	2	2	
			1998	5		
			1999	15		
			2000	25		

NRM II Results Name	Results Indicator	Data Sources	Year	Planned	Actual	Comments
SO 1.B	Value of total Campfire benefits per household	CA , WWF	1994	150	93	☛1989: Z$ 89 (data source not identified) ☛This indicator presumes that all households benefit equally from the CAMPFIRE dividends, which may not be true for some uses of the dividends - such as a CAMPFIRE meeting hall or a store selling farm implements. ☛Assumes equivalent accounting of benefits across communities. ☛Indicator is not a measure of SO1 as it is defined, i.e., :"NRM strengthened ..."It is at higher purpose level. ☛This indicator will not be reported after 1998.
			1995			
			1996	146	87	
			1997	175		
			1998			
			1999			
			2000			

NRM II Results Name	Results Indicator	Data Sources	Year	Planned	Actual	Comments
SO1.B(a)	Value of total CAMPFIRE benefits	CA, WWF	1994			☛This is a proposed indicator ☛This is not a measure of SO1 as it is defined. It is at higher purpose level. ☛Assumes comparable accounting of "benefits" across all communities. ☛1989: Z$ 43,699 (data source not identified) ☛Original indicator assumed 1USD = Z$ 10.07. Exchange rate in March 1998 was 1USD = Z$ 15.4
			1995		Z$ 14,082,032 US$ 1,614,912	
			1996		Z 17,445,801 US 1,732,453	
			1997			
			1998			
			1999			
			2000	US$ 2,400,000		
SO 1.B(b)	Number of households in Campfire communities	CA, WWF	1994			☛This is a proposed indicator ☛1989: 9000 (data source not identified) ☛Total number of CAMPFIRE communities may include some that are not generating CAMPFIRE revenues

NRM II Results Name	Results Indicator	Data Sources	Year	Planned	Actual	Comments
			1995	n/a	103,000	
			1996	n/a	105,000	
			1997	n/a	200,000	
			1998	210,000		
			1999			
			2000	250,000		
SO 1.C	Value of local-level Campfire benefits per household (Z$)	CA, WWF	1994			☛$US 1 = Z$ 15.4
			1995	112	72	☛1989: Z$ 44 (data source not identified)
			1996	135	84	☛Is not a measure of SO1 as it is defined. It is at a higher purpose level
			1997	150	TBD	
			1998	175	TBD	☛Measure assumes that households are equally affected by the revenues. May not be if revenues go for community projects that some households do not participate in (schools)
			1999			
			2000	TBD		

NRM II Results Name	Results Indicator	Data Sources	Year	Planned	Actual	Comments
SO 1.D	Status of Natural Resource Base in Campfire Areas	WWF, Dept. Of National Parks and Wild Life Management (DNPWLM), Dept. Of Natural Resources and Forestry Commission	1994			☛1989: "Rapid Habitat Loss and Decreasing Wildlife Numbers" (Measurement methodology not identified) ☛Present indicators are inadequate to determine national trends in the status of the natural resource base. There are ground counts in some locations and aerial surveys in most places for Elephants. There some isolated studies but no nation wide data base
			1995			
			1996			
			1997		Moderate habitat loss and stable wildlife numbers	
			1998			
			1999			
			2000	Negligible habitat loss and stable wildlife numbers		
SO 1.E (Proposed)	Diversification of Campfire revenue base (%)	CA, WWF	1994		5.5	☛This is a proposed indicator ☛1989: 6.6 % (data source not identified) ☛This is not a measure of SO1 as it is defined. It is at a higher purpose level
			1995		7.1	
			1996		8.8	
			1997	9.5		
			1998			

NRM II Results Name	Results Indicator	Data Sources	Year	Planned	Actual	Comments
			1999			
			2000	15		
IR 1.0	Sustainable NRM practices adopted. # of reported NRM by-law infractions committed by Campfire communities with NRM by-laws	Rural District Councils	1994			☛Indicator depends on local enforcement practices regarding NRM by law infractions ☛Not all CAMPFIRE communities have by bylaws in force ☛This indicator is closer to the SO1 level as it is defined, than to the IR level. ☛It is a process measure.
			1995			
			1996			
			1997			
			1998		TBD	
			1999			
			2000	TBD		
IR 2.0	Sound community decision making processes adopted. # of institutionally developed Campfire communities / # of Campfire communities. Expressed as % (see comments)	ZT (POMS)	1994			☛POMS system in development; a very complex instrument. ☛POMS as a *project implementation* scaling methodology is problematic at best - it is unexplained and untested in a rigorous manner (e.g., POMS uses ordinal scaled values and divides them ratio values) justifying its use as a results measure in the R4.
			1995			
			1996			
			1997	3	3	
			1998	7	TBD	
			1999			
			2000	3.5		

NRM II Results Name	Results Indicator	Data Sources	Year	Planned	Actual	Comments
IR 3.0	Rural land pressure reduced. (Persons per sq. Mile)	Central Statistics Office, Rural District Councils	1994			☛ CAMPFIRE cannot be posited as a cause of population density. Indicator is limited to being a descriptor of the CAMPFIRE community. Does not fit the strategy at either the IR or SO level. It is (possibly) a mediating factor.
			1995			
			1996			
			1997			
			1998			
			1999			
			2000	TBD		

Source: March 1998 USAID R4 Draft

APPENDIX M

DETAILED PRESENTATION OF CAMPFIRE HUNT DATABASE

Table 1. Summary of quotas, # reported hunted, US$ Fee paid to RDC, mean trophy value and standard deviations, and % of hunted animals reported for selected species hunted in Zimbabwe 1994-1996 based on hunter reports supplied to WWF and incorporated into their HUNT Database.

NATIONAL SUMMARY															
			1994					1995					1996		
SPECIES - SEX	*QUOTA*	*# REPORTED*	*US$ FEE*	*TROPHY MEAN*	*TROPHY S.D.*	*QUOTA*	*# REPORTED*	*US$ FEE*	*TROPHY MEAN*	*TROPHY S.D*	*QUOTA*	*# REPORTED*	*US$ FEE*	*TROPHY MEAN*	*TROPHY S.D.*
ELEPHANT MALE	142	76	382,345	1=30.3	23	156	102	430,354	1=26.19	21	159	71	1,140,660	1=22.76	21.6
ELEPHANT FEMALE	146	9	n=89	2=1.11	4.2	185	25	n=148	2=1.65	5	88	28	n=102	2=1.48	4.75
% REPORTED		**29.5%**					**37.2%**					**40.1%**			
BUFFALO MALE	409	200	158,852	18.74	23	407	337	301,834	26.29	26	418	205	226,843	33.09	13.7
BUFFALO FEMALE	137	47	n=248			139	71	n=412			126	52	n=264		
% REPORTED		**45.2%**					**74.7%**					**47.2%**			
LION MALE	63	14	19,350	2.71	5.6	57	16	24,510	6.79	7	51	8	22,750	6.02	7.13
LION FEMALE	32	3	n=17			35	2	n=19			22	3	n=13		
% REPORTED		**17.9%**					**19.6%**					**15.1%**			
LEOPARD MALE	120	29	61,450	1.78	3.9	130	37	99,023	3.93	6	134	33	105,606	5.94	4.02
LEOPARD FEMALE	0	6	n=46			0	20	n=67			8	7	n=45		
% REPORTED		**29.2%**					**43.8%**					**28.2%**			

Table 2. Summary of elephant hunting by district including population estimates, quotas, # reported hunted in the WWF hunt database, US $ Fee paid to RDC, and Zimbabwe $ Fee received by RDC.

ELEPHANTS BY DISTRICT															
	1994					1995					1996				
DISTRICT *	POP'N ESTIMATE	QUOTA **	# REPORTED TAKEN	U.S. $ FEE	ZS RDC REVENUE	POP'N ESTIMATE	QUOTA	# REPORTED TAKEN	U.S. $ FEE	ZS RDC REVENUE	POP'N ESTIMATE	QUOTA	# REPORTED TAKEN	U.S. $ FEE	ZS RDC REVENUE
BB	ø	3M	6M	16,000 n=2	ø	ø	5M	2M	16,000 n=2	ø	ø	3M	5M	41,500 n=5	19,415 n=4
BM	ø	1F; 4M	3M	37,000 n=4	308,050 n=4	400[c]	1F; 4M	1F; 4M	9,500 n=2	257,000 n=2	ø	3F; 6M	3M	29,065† n=3	294,760 n=3
BN	572[a]	27F; 17M	0	ø	ø	730[a]	29F; 17M	1F; 15M	50,000 n=7	ø	519[b]	17F; 17M	7F; 17M	137,000 n=20	ø
CP	ø	4M	0	ø	ø	ø	4M	1M	ø	ø	ø	4M	0	ø	ø
CR	5,241[c] (1993)	17M	0	1,200 n=1	12,000 n=1	4,143[c]	18M	13M	N/A	12,000 n=6	3,844[d]	23M	8M	41,884 n=9	144,000 n=4
GN	668[a]	4F; 7M	5F; 6M	4,500 n=4	N/A	591[a]	17F; 9M	7F; 8M	20,200 n=5	ø	224[b]	5F; 2M	2F; 2M	1,200 n=2	ø
GV	2,495[c] (1993)	56F; 18M	4F; 20M	20,300 n=4	50,662 n=4	2,107[c]	72F; 18M	9F; 12M	16,200 n=5	30,678 n=5	2,792[b]	22F; 18M	12F; 14M	46,000 n=19	45,126 n=13
HU	799[a]	12M	13M	ø	ø	1,031[a]	13M	12M	ø	ø	682[b]	13M	0	ø	ø
HW	36,027[c]	3F; 8M	7M	28,000 n=4	193,050 n=4	27,189[c]	3F; 12M	1F; 11M	ø	370,000 n=6	33,143[d]	6F; 10M	5M	24,496† n=4	377,456 n=4
MB	ø	3M	4M	ø	68,000 n=2	ø	2M	4M	31,754 n=2	222,640 n=2	ø	2M	1M	ø	ø
MD	ø	2M	0	ø	ø	ø	2M	1M	4,125 n=2	45,000 n=2	ø	2M	2M	9,750 n=2	110,598 n=2
NM	2,324[a] (1993)	1F; 23M	9M	18,800 n=4	ø	3,465[a]	6F; 23M	6F; 19M	32,500 n=7	190,635 n=5	ø	10F; 23M	6F; 14M	74,500 n=14	273,702 n=14
TS	689[c]	16M	8M	48,600 n=10	519,977 n=10	2,859[c]	21M	0	ø	ø	0	21M	0	ø	ø

Data Sources: a = Taylor and Mackie (1997); b = Mackie (1997); c = Price Waterhouse (1996); d = DNPWLM (1996a); DNPWLM (1996b).

District Codes: BB = Beit Bridge; BM = Bulilima-Mangwe; BN = Binga; CP = Chipinge; CR = Chiredzi; GN = Gokwe North; GV = Guruve; HU = Hurungwe; HW = Hwange; MB = Muzarabani; MD = Mudzi; NM = Nyaminyami; TS = Tsholotsho.

Ø = data not available; † = data re-calculated to US $ from WWF HUNT database which appeared to indicate Z$.

NB: when 1994 population estimates were unavailable, 1993 values were used and noted. Estimates for CR include Gonarezhou aerial survey results; GV include data from Dande aerial surveys; HW includes estimates for Hwange NP and Matetsi SA.

APPENDIX N

POLICY DOCUMENTS RELATED TO CAMPFIRE

1. Policy Logs from WWF Policy Monitoring (Bond 1998)
2. Appropriate Authority - Parks and Wild Life Act
3. Parks and Wild Life Act SI 26-2/1998
4. Excerpts from Natural Resources Act, Communal Land Act, Forest Act, RDC Act
5. Example of RDC Natural Resources By-Laws

Appendix [redacted] Policy Logs

Wildlife Policy Log

Policy / Legislation	Date	Sponsor	Description and Potential Impact	Positive or Negative	Source
Parks and Wildlife Act	1975 (amended 1982, 1990)	Government	LSCF become the appropriate authority for wildlife on their land.	Positive	The Act
Amendment to Parks and Wildlife Act which allows district councils to be designated the appropriate authority for wildlife in the communal lands	1982	Government	Enabled district councils to be designated the appropriate authority for wildlife in the communal areas.	Positive	Amendment to the Act
General Notice 369 of 1988	1988	Muzarabani District Council	Mavuradonha Wilderness Area proclaimed. First protected area to be created in the communal lands without central government intervention.	Positive	General Notice 369 of 1988 in Cunliffe (1992)
Gu.uve and Nyaminyami District Councils receive letters of Appropriate Authority from Minister of Environment and Tourism.	1989	Minister of Environment and Tourism	Nyaminyami and Guruve become the first districts to control wildlife resources. Start of the CAMPFIRE Programme.	Positive	Petersen 1992
Protection of Wild life (Indemnity) Act	1989	Government	This protects persons against criminal liability in respect of acts done in good faith to suppress unlawful hunting of wildlife.	Positive	The Act
DNPWLM issues CAMPFIRE Guidelines for the use and allocation of wildlife revenue by district councils	1991	DNPWLM	Guidelines recommended that at least 50% of gross wildlife income be devolved to producer communities, up to 35% be used for wildlife management and up to 15% for programme administration.	Positive	Petersen

Policy / Legislation	Date	Sponsor	Description and Potential Impact	Positive or Negative	Source
Twelve District Councils receive Appropriate Authority	1991	Government	Twelve districts empowered to manage their wildlife resources..	Positive	Statutory instruments 12 and 63 of 1991.
DNPWLM issue revised CAMPFIRE Guidelines	1992	DNPWLM	The guidelines increase the allocation of wildlife revenue to producer communities to at least 80%, with 15% being retained by RDC for management and the remaining 5% as a levy.	Positive	Child (1996)
CAMPFIRE Association becomes lead agency and CCG agree to devolve Appropriate Authority to ward level.	Sept. 1992	CAMPFIRE Association	CAMPFIRE programme lead and represented by a producer association. Recognition that further devolution of appropriate authority necessary to provide necessary enabling environment.	Positive	Ihunyani Hills Workshop Report (1992)
Mr. W. Chiwewe informs Gokwe North RDC that wildlife revenues are to be used throughout the district	June 1994	Mr W. Chiwewe: Permanent Secretary MLGRUD	This statement implies the non-acceptance of the MLGRUD of the CAMPFIRE Principles which are based on the producer community principle.	Negative	Gokwe North RDC Special full Council meeting on 13/6/94
Twelve more rural district councils receive appropriate authority. Total = 24	1994	Government	Further twelve districts empowered to manage their wildlife resources. Total number of districts with Appropriate Authority for wildlife 24.	Positive	SI 40/94
Contract for the funding of the Natural Resources Management Project signed	October 1994	USAID and GoZ	The agreement amends the 1990 amendment to the 1989 agreement. This agreement provides fund (CDF) for development of essential wildlife infrastructure by RDC's.	Positive	Project Grant Agreement Amendment Number 2
CAMPFIRE Association adopts an 18-point resolution.	1995	CAMPFIRE Association	The resolutions aim at diversifying from wildlife to other natural resources and the establishment of a fund for the environment.	Positive	CA Annual General Meeting 1995

DNPWLM indicates to Chipinge and Gurnve RDCs that they will be required to lease Malipati and Dande SA at commercial rates	October 1996	DNPWLM	Malapati and Dande Safari Areas were created out of communal land for benefit of communal land residents. Policy decision indicative of a recentralisation of control by DNPWLM.	Negative	Pers. comm. Gurnve RDC.
MET and MLGRUD issue joint statement indicating that RDC's should be considered the primary beneficiaries of the CAMPFIRE Programme.	November 1996	MET and MLGRUD	Further rejection of the producer community principle and the efforts of the CAMPFIRE Collaborative Group to decentralise appropriate authority to ward level.	Negative	IUCN (1997)
MET and MLGRUD issue joint statement that RDCs "will not be forced into any one model of benefit distribution"	November 1996	MET and MLGRUD	Further rejection of the producer community principle and the efforts of the CAMPFIRE Collaborative Group to decentralise appropriate authority to ward level. Potentially allows RDCs to retain significant proportion of wildlife revenue.	Negative	IUCN (1997)
DNPWLM becomes a Statutory Fund	February 1997	DNPWLM	Potentially reduces DNPWLM involvement in wildlife management activities outside the protected areas.	Negative	DNP&WLM
DNP&WLM requires RDCs to report all problem animals to provincial wardens first before dealing with them	1997	DNPWLM	Effective re-centralisation of problem animal control, weakens the enabling conditions created by the decentralisation of appropriate authority.	Negative	CAMPFIRE Association
DNP&WLM Public Notice requiring LSCF to submit intended offtake quotas for private land.	October 1997	DNPWLM	This notice weakens the enabling conditions created by the decentralisation of appropriate authority.	Negative	Sunday Mail 27 October 1997
MET indicates that other resources like forests and minerals will be included in the CAMPFIRE programme	1997	Ministry of Environment and Tourism	Indication that there is to be decentralisation of management of resources other than wildlife.	Positive	MET
CAMPFIRE Association press statement indicates that the Association will not dictate to communities on the use of wildlife revenue.	October 1997	CAMPFIRE Association.	Indicative of the autonomy that the CAMPFIRE Association feels should be given to local communities.	Positive	Herald 30 October 1997

CAMPFIRE Association Board reaffirms that Appropriate Authority should be devolved to producer wards.	December 1997	CAMPFIRE Association	Supports the 1992 CCG recognition that further devolution of appropriate authority necessary to provide necessary enabling environment.	Positive	CAMPFIRE Association Strategic Plan 1997 - 2002

Forest Policy Log

Policy / Legislation	Date	Sponsor	Description and Potential Impact	Positive or Negative	Source
Native Reserves Forest Produce Act	1928	Government	The Act sought to regulate the use of forest products in the communal areas rather than commercial areas, and was applied on the basis of land tenure.	Negative	
Natural Resources Act (Chapter 20:13)	1941	Government	The Act gives the Natural resources Board powers to enforce measures on land users or occupiers, most of which are technical recommendation based on shaky empirical foundations.	Negative	Bradley and McNamara, 1993
Forest Act (Chapter 19:05)	1949	Government	For the establishment of a commission for administration, control and management of State forests.	Positive	The Act
Forestry Commission established	1954	Government	The Commission was established for the management of demarcated forests.		
Communal Land Forest Produce Act:	1988	Government	The act regulates exploitation of and protects forest produce within communal land This was as well enacted on the basis of land tenure, thus having the same effect as the Native Reserves Forest Produce Act (1928). It also makes much current forest product management in communal areas illegal.	Negative	Bradley and McNamara, 1993
Memorandum by Minister of Environment and Tourism	1990	Minister of Environment and Tourism	The memorandum sought Cabinet endorsement of Zimbabwe's National Forest Policy	Positive	
Forest Act (Chapter 19:05) amended	1996	Government	The Act allows for more innovative resource sharing opportunities to be developed on forest land.	Positive	Bradley and McNamara

Land Policy Log

Policy / Legislation	Date	Sponsor	Description and Potential Impact	Positive or Negative	Source
Land Apportionment Act	1930	Government	Racial separation of land into Black and White areas	Negative	The Act
Native Land Husbandry Act	1951	Government	Change of traditional tenure to Western style, and enforcement of destocking and soil conservation. Developed negative attitude towards conservation because of enforcement.	Negative	The Act
Native Land Husbandry Act Scrapped	1961	Government	The Act was scrapped after resistance	Positive	
Tribal Trust land Act	1965	Government	Traditional tenure restored, tribal land authorities created operating under District Commissioners	Positive	The Act
Agricultural Land Settlement Act (Chapter 137)	1979	Government	This Act resulted in the establishment of the Agricultural Land Settlement Board, and empowers the Minister to acquire land for settlement schemes.	Positive	The Act
Communal Land Act	1982	Government	Changed Tribal Trust Lands into Communal Areas, changing authority from traditional leaders to District Councils. This is tantamount to central control.	Negative	Land Tenure Commission Report
Statement of Policy and Directive by Prime Minister	1984	Prime Minister Mugabe (then)	Creation of VIDCOs and WARDCOs through which District Councils execute their functions. Although this seemed like devolving authority to lower levels, it was a consolidation of the Land Tenure Act which took away the powers of traditional leaders.	Negative	Land Tenure Commission Report
Land use and conservation by-laws	1985	Government	The by-laws empowered district councils to make plans that specify the maximum number of livestock grazing an area, and measures to be taken for the conservation of wildlife in any grazing area. Land use plans are made without consultation with the local people, which is tantamount to centralised decison making.	Negative	SI 166/1985

Land Acquisition Act	1985	Government	The Act gave government the first right to purchase large scale farms for resettlement	Positive	Land Tenure Commission Report
Rural District Councils Act	1988	Government	Authorized the formation of a unified system of local government	Positive	The Act
Government announces land reform policy (after the expiry of the Lancaster House Constitution)	1990	Government	The reform had the following key policy issues: •land designation for resettlement •land price •land taxation and farm size control •monitoring of land use productivity •land ownership control •state sector development	Positive	
Land Acquisition Act	1992	Government	the Act empowers the president and other authorities to acquire land and other immovable property compulsorily	Negative	The Act
The President appoints Land Tenure Commission	1993	President Mugabe	The Commission was appointed to inquire the appropriate land tenure systems	Positive	Land tenure commission Report
Land Tenure Commission Report	1994	Land Tenure Commission	Commission recommends proposed legislative and administrative reforms on land tenure, with focus towards encouraging local level autonomy and security in the communal areas.	Positive	Land tenure commission Report
Policy / Legislation	**Date**	**Sponsor**	**Description and Potential Impact**	**Positive or Negative**	**Source**

Department of Lands established within the Ministry of Agriculture	1997	Ministry of Agriculture	?	Positive	Ministry of Agriculture
President Mugabe announces that government will not compensate Large Scale Commercial farmers for land designated for resettlement	1997	President Mugabe	?	Negative	Press News

less in either case the amount of any compensation which may have been paid to the owner by or on behalf of the person convicted.

(3) Sections 348 and 349 of the Criminal Procedure and Evidence Act [*Chapter 9:07*] shall apply, *mutatis mutandis*, in relation to the amount specified in an order made in terms of subsection (1) as if such amount were a fine referred to in those sections and any amount so recovered shall be paid to the owner of the animal concerned:

Provided that the owner shall give security *de restituendo* in case the judgment of the court which made the order is reversed on appeal or review.

(4) Where an order is made in terms of subsection (1) upon two or more persons, the liability therefor shall be joint and several unless the court, in its order, apportions the amount which each such person shall be required to pay.

106 Forfeiture and cancellation of authority in terms of this Act

(1) Where any person is convicted of—

(*a*) a contravention of paragraph (*b*) of subsection (1) of section *fifteen*, paragraph (*a*) of subsection (1) of section *twenty-four* or subsection (1) of section *thirty-six*; or

(*b*) an offence in terms of this Act involving hunting or fishing and such hunting or fishing took place at night;

the court—

(i) shall, unless good cause to the contrary is shown, order that any weapon, explosive, fishing net or dazzling light; and

(ii) may order that any tent, vehicle, aircraft or boat used for the purpose of or in connection with the commission of the offence shall be forfeited to the State.

(2) Where any person is convicted of an offence in terms of this Act involving hunting or fishing and the offence is not an offence mentioned in paragraph (*a*) or (*b*) of subsection (1), the court may order that any weapon, explosive, fishing net, tent, vehicle, aircraft or boat used for the purpose of or in connection with the commission of the offence shall be forfeited to the State.

(3) Where any person is convicted of an offence in terms of this Act, the court may order that any animal, other than a specially protected animal, or the meat or trophy of any such animal or any fish in respect of which the offence was committed shall be forfeited to the appropriate authority for the land on which or the appropriate authority for the waters in which, as the case may be, the offence was committed:

(4) Anything ordered to be forfeited to the State in terms of subsection (1), (2) or (3) shall be deemed to be a State trophy.

(5) The conviction of a person who has any authority in terms of this Act of an offence in terms of this Act shall, if he is sentenced therefor to pay a fine of two hundred dollars or more or to imprisonment for a period of three months or more and whether or not such imprisonment is suspended or is an alternative to a fine, have the effect of cancelling any such authority with effect from the date of such conviction unless in a particular case the Minister otherwise directs.

PART XVI

INSPECTORS, OFFICERS, EMPLOYEES AND ADVISORY COMMITTEES

107 Director of National Parks and Wild Life Management

(1) There shall be a Director of National Parks and Wild Life Management whose office shall be a public office and form part of the Public Service and who shall have the powers and perform the duties conferred upon him by this Act.

(2) The Minister may delegate to the Director such of the powers conferred upon him in terms of this Act as he thinks fit.

(3) All powers conferred upon the Director in terms of this Act or delegated to him by the Minister shall be exercised subject to the directions of the Minister.

(4) The Director may, with the consent of the Minister, delegate to officers, inspectors and employees such of the powers and duties conferred upon or delegated to him in terms of this Act as he thinks fit.

(5) All powers and duties delegated to an officer, inspector or employee by the Director shall be exercised subject to the directions of the Director.

108 Appointment of appropriate authority

(1) The Minister may, by notice in a statutory instrument, appoint a rural district council to be the appropriate authority for such area of Communal Land as may be specified in such notice and may in like manner amend or revoke such notice.

(2) Where, by virtue of a notice made in terms of subsection (1), the appropriate authority for any area of Communal Land is changed, any permit issued by the previous appropriate authority which was of force and effect immediately before the date of commencement of the notice shall remain in force and effect and be subject to amendment or cancellation as if it had been issued by the new appropriate authority.

109 Officers, inspectors and employees

(1) The Minister may designate the persons or classes of persons employed in the Public Service who shall be officers, inspectors or employees for the purpose of exercising the powers and performing the duties conferred and imposed upon officers, inspectors and employees in terms of this Act:

Provided that the Minister shall not designate persons employed in any Ministry the administration of which has not been assigned to him without the consent of the Minister to whom the administration of that Ministry has been assigned.

(2) An officer, inspector or employee shall be furnished with a certificate signed by or on behalf of the Minister which shall state that the holder has been designated as an officer, inspector or employee for the purposes of this Act.

(3) An officer, inspector or employee exercising any power or performing any duty conferred or imposed upon him in terms of this Act or about to do so shall, on demand by any person concerned, produce the certificate issued to him in terms of subsection (2).

(4) The Minister may delegate to officers, inspectors and employees such of the powers conferred upon him in terms of this Act as he thinks fit.

(5) All powers and duties conferred upon officers, inspectors and employees in terms of this Act or delegated to

Parks and Wild Life (General) (Amendment) Regulations, 1998 (No. 2)

IT is hereby notified that the Minister Mines, Environment and Tourism, in terms of section 129 of the Parks and Wild Life Act [*Chapter 20:14*], has made the following regulations:—

1. These regulations may be cited as the Parks and Wild Life (General) (Amendment) Regulations, 1998 (No. 2).

2. Section 52 of the Parks and Wild Life (General) Regulations, 1990, published in Statutory Instrument 362 of 1990 (hereinafter called "the principal regulations") is amended—

(a) by the repeal of the definition of "breeder" and the substitution of the following—

""breeder" means any person who keeps or produces wild life or fish for the purpose of selling any wild life or fish or any trophy therefrom;";

(b) in the definition of "dust" by the insertion after "such ivory" of "which weighs less than thirty grams";

(c) in the definition of "trophy dealer" by the repeal of paragraph (a) and the substitution of—

"(a) process, carves, embellishes or stuffs and mounts a trophy so that it has a life like appearances or otherwise manufactures any trophy for sale or reward; or";

(d) by the insertion of the following definition—

"taxidermist" means a person who processes, prepares, stuffs and mounts a trophy so that it has a life like appearance;".

3. The principal regulations are amended by the insertion after section 58 of the following section—

"58A. Every person who, for reward or otherwise intends to conduct any other person who is not ordinarily resident in Zimbabwe on a photographic or viewing safari in a Parks and Wild Life Estate shall, before the commencement of the proposed safari send to the Director a written notice in duplicate setting out the following information—

(a) full names and address of the person who is to conduct the safari; and

(b) the type of safari to be conducted; and

(c) the number of persons to be taken on the safari; and

(d) the park in which the safari is to be conducted; and

(e) the type of vessel or vehicle to be used on the safari; and

(f) the currency in which any amount payable is to be paid.

(2) On receipt of a notice sent to him in terms of subsection (1) and the appropriate fee, the Director shall in writing authorize the photographic or viewing safari concerned unless he is satisfied on reasonable grounds that—

(a) any information contained in the notice is untrue; or

(b) a contravention of any law is likely to take place if the safari takes place; or

(c) the area in the Parks and Wild Life Estate in respect of which the application is made, is unsuitable for the conduct of the safari.

(3) The Director may attach such reasonable conditions as he thinks fit to any authority given by him in terms of subsection (2), and any such conditions shall be endorsed in writing on the authority concerned.

(4) No person shall, for reward or otherwise, conduct any other person who is not ordinarily resident in Zimbabwe on a photographic or viewing safari in a Parks and Wild Life Estate unless—

(a) at the commencement of the safari he is in possession of the written authority given by the Director in terms of subsection (2) in respect of the safari concerned; and

(b) he complies with any conditions which the Director may have attached to the written authority; and

(c) holds in addition to holding a professional hunter's licence, a learner professional hunter's licence or a professional guide's licence, a tour operator's licence or is a director, employee or agent of a holder of a tour operator's licence issued in terms of the Tourism Act [*Chapter 14:20*]; and

(d) in the case where an open vehicle is used, it is solidly constructed up to the shoulder level of seated passengers and is fitted with protective bars; and

(e) the vehicle to be used on the safari is the subject of an operator's licence issued in terms of the Road Motor Transportation Act [*Chapter 13:10*];

(5) Subsection 4 shall not apply in relation to an officer, honorary officer or employee while he is carrying out his duties as such.

(6) Subsection 4 shall come into operation two months after the date of commencement of the Parks and Wild Life (General) (Amendment) Regulations, 1998 (No. 2):

Provided that, if during that two-month period any person referred to in subsection (1) applies for a tour operator's licence under the Tourism Act [*Chapter 14:20*], he shall be deemed for the purpose of this section to be the holder of such a licence until his application is granted or refused.".

4. Section 59 of the principal regulations is amended—

(a) in subsection (1) by the insertion after paragraph (f) of the following paragraphs—

"(g) the full names and address of the hunter who is to conduct the safari and his licence number; and

(h) the duration of the hunt and the types of animals to be hunted.";

(b) by the insertion of the following subsection—

"(4b) No person shall permit any person who is not ordinarily resident in Zimbabwe to hunt on any land for which he is the appropriate authority any animals other than those entered on the authority to hunt set out in the Fourteenth Schedule.".

5. Section 60 of the principal regulations is amended—

(a) in subsection (1), in paragraph (b) by the insertion after "form" of "and a copy of the authority to hunt";

(b) by the insertion after subsection (3) of the following subsection—

"(4) Any person who is the appropriate authority for any land, who hunts or causes or permits any person to hunt on his land, shall submit annually—

(a) a sport hunting registration form as specified in Part I of the Fifteenth Schedule; and

(b) a hunting return form specified in Part II of the Fifteenth Schedule.".

6. Section 61 of the principal regulations is amended by the deletion of "reptiles or amphibia" and the substitution of "wild life or fish".

7. Section 63 of the principal regulations is amended in the proviso by the deletion of "reptiles and amphibia" and the substitution of "wild life or fish".

8. Section 64 of the principal regulations is amended by the repeal of subsections (1) and (2) and the substitution of—

"(1) A breeder of wild life or fish shall keep a register in which he shall cause to be recorded, by species—

(a) the number of eggs acquired, the place from which they were acquired and the number of eggs successfully hatched; and

(b) the number of live wild life or fish acquired and the place from which they were acquired; and

(c) the number of wild life or fish disposed of, by age, size or class, and the method of disposal.".

9. Section 65 of the principal regulations is amended by the deletion of "reptiles or amphibia" and the substitution of "wild life or fish".

10. Section 66 of the principal regulations is amended by the insertion after paragraph (e) of the following paragraph—

"(f) no person shall carry on the business of taxidermy, processing or otherwise manufacturing a trophy unless he is authorized to do so by a trophy dealer's licence, issued in terms of section 67.".

11. Section 67 of the principal regulations is amended in subsection (2) in paragraph (b) in subparagraph (ii) by the insertion after "trophy dealer" of "a taxidermist,".

12. Section 77 of the principal regulations is amended by the insertion after subsection (4) of the following subsections—

"(5) For the purpose of verifying any records or registers kept in terms of this section, the Minister may at any time, when he considers it necessary to do so, by notice in the *Gazette* require any person within a period of not more than thirty days from the date of publication of the notice, to produce to an officer any raw ivory or horn in his possession and the certificate of ownership for re-registration.

(6) In the event of a re-registration in terms of subsection (5), the officer shall issue a new certificate of ownership in respect of such ivory or horn and any certificate of ownership issued prior to the re-registration exercise in respect of any raw ivory or horn, shall, after the period of re-registration, be void.".

13. Section 81 of the principal regulations is amended by the repeal of subsection (1) and the subsection of—

"(1) Upon the sale or transfer of any registered raw ivory, the person disposing of it and the person receiving it shall present themselves before an officer who shall immediately endorse upon the certificate of ownership the name and address of the person to whom the sale or transfer has been effected, and shall sign and stamp such endorsement.".

14. Section 97 of the principal regulations is amended by the repeal of subsection (2) and the subsection of—

"(2) The Director may, in terms of subsection (1), fix—

(a) different appropriate fees to be paid by persons resident in Zimbabwe and persons not so resident;

(b) different levels of appropriate fees;

(c) different appropriate fees for breeding different species of wild life or fish.".

circulating in its area and shall give verbal or written notice of the time and place of such meeting to every such holder of land whose address is known to such committee.

(5) The notice referred to in subsection (4) shall set out the proposed amount of the unit of the tax to be imposed.

(6) At any meeting convened in terms of subsection (4), those members of the conservation committee who are holders of land referred to in that subsection shall be entitled to vote on any resolution at such meeting.

(7) Every such tax shall be imposed, assessed and graduated in accordance with the Schedule, and shall become due and payable upon a date fixed by the conservation committee.

(8) If any tax imposed under this section remains unpaid after three months from the date fixed by the conservation committee for the payment thereof, interest upon such tax may, in the discretion of the conservation committee, be charged and recovered by such committee at the rate fixed in terms of section *forty-one*, reckoned from the date upon which such period of three months expires, with a minimum charge of one month's interest.

44 Position upon division of intensive conservation area

(1) Whenever an intensive conservation area is divided into two or more intensive conservation areas in consequence of the exercise by the Minister of the powers conferred upon him by paragraph (*f*) of subsection (2) of section *thirty-five* or whenever any portion of an intensive conservation area is severed and declared to be a separate intensive conservation area or is joined to another intensive conservation area in consequence of the exercise by the Minister of the powers conferred upon him by paragraph (*e*) of subsection (2), the assets and liabilities of the conservation committee appointed for the intensive conservation area which is divided or from which the portion is severed, as the case may be, shall be apportioned among the conservation committees concerned in such manner and in such proportions as may be mutually agreed upon by such committees or, failing such agreement, as may be determined by the Board.

(2) Whenever two or more intensive conservation areas are joined in consequence of the exercise by the Minister of the powers conferred upon him by paragraph (*d*) of subsection (2) of section *thirty-five*, the conservation committees appointed for such areas shall be deemed to be dissolved and all the assets and liabilities of such committees shall be transferred to and vest in the committee appointed in their place.

(3) Whenever the declaration of an area as an intensive conservation area is cancelled in consequence of the exercise by the Minister of the powers conferred upon him by paragraph (*g*) of subsection (2) of section *thirty-five*, the conservation committee appointed for such area shall be dissolved and all moneys or other assets or property or things whatsoever, and all books, accounts or other documents belonging to such committee shall be vested in such person as may be appointed for that purpose by the Minister (hereinafter called the liquidator), and the liquidator shall liquidate all valid claims against the committee out of the moneys or other assets of the committee.

(4) If the moneys or other assets referred to in subsection (3) prove to be—

(*a*) less than the amount required to liquidate all valid claims which may be brought against the committee, the liquidator may, in order to make good the deficiency, levy a rate assessed in such manner as may be approved by the Board upon all holders of land within the committee's area, and such rate shall become due on such date as may be determined by the liquidator and may be recovered by him by proceedings in any court of competent jurisdiction;

(*b*) in excess of the amount required to liquidate all valid claims which may be brought against the committee, the liquidator shall dispose of such surplus in such manner as the Board may direct.

PART VI

CONSERVATION AND IMPROVEMENT OF NATURAL RESOURCES IN COMMUNAL LAND

45 Provisions for Communal Land

The provisions of this Part shall apply to Communal Land.

46 Protection of despoiled or deteriorated areas

(1) Where in any Communal Land any land has become despoiled or is deteriorating through over-grazing or other misuse, the Board may, with the approval of the Minister responsible for the administration of the Communal Land Act [*Chapter 20:04*] direct that the whole or part of such land be reserved against human occupation or cultivation, the depasturing of stock or the cutting down or destruction of trees and other vegetation.

(2) No reservation shall take place in terms of subsection (1) unless and until the Minister responsible for the administration of the Communal Land Act [*Chapter 20:04*] is satisfied that suitable provision has been made elsewhere for the inhabitants who would be affected by the reservation and such reservation shall be withdrawn when, in the opinion of the Board, its objects have been sufficiently accomplished.

(3) Land reserved in terms of this section shall be clearly demarcated and may, with a view to more effective regeneration, be fenced on the recommendation of the Board and the cost of such fencing shall be paid from moneys appropriated for the purpose by Act of Parliament.

(4) Any person committing an act in conflict with a reservation made in terms of subsection (1) or interfering with any demarcation or fencing carried out in terms of subsection (3) shall be guilty of an offence.

47 Destocking and limitation of stock

(1) Whenever the President is satisfied, on the report of the Board or of the Minister responsible for local government, that the natural resources in any Communal Land are being injured or are deteriorating through over-stocking by domestic animals, he may authorize the reduction of the number of such animals and prescribe the maximum number and class of such animals as may be depastured on a fixed unit of land.

(2) The Minister responsible for local government, before submitting any report to the President in terms of subsection (1), shall first submit such report to the Board for its report thereon.

(3) Destocking and limitation of stock in terms of this section shall be carried out in accordance with regulations.

48 Setting aside areas for protection of natural resources

(1) The President may, on the recommendation of the Board and with the approval of the Minister responsible for the administration of the Communal Land Act [*Chapter 20:04*] set aside areas in any Communal Land for the

conservation or improvement of natural resources or for the protection of irrigation works or sources of water supplies.

(2) No area shall be set aside in terms of subsection (1) unless and until the Minister responsible for the administration of the Communal Land Act [*Chapter 20:04*] is satisfied that suitable provision has been made elsewhere for the inhabitants who would be affected by the setting aside of such area.

49 Obligation to maintain conservation works

Where soil conservation works have been carried out for the common benefit of the inhabitants living in Communal Land, any such inhabitant enjoying the facilities furnished thereby who fails to maintain such portions of the works as afford direct protection to the land set aside for his use in a manner reasonably sufficient to ensure such protection shall be guilty of an offence.

50 Powers of Minister in respect of Communal Land preserved

Nothing in this Act contained shall derogate from the powers in respect of natural resources conferred by the Communal Land Forest Produce Act [*Chapter 19:04*] on the Minister to whom the administration of that Act has been assigned or the Secretary of the Ministry for which the Minister is responsible, or by the Rural District Councils Act [*Chapter 29:13*] on rural district councils. The advice and co-operation of the Board shall be available to the person or council exercising such powers.

PART VII

CONSTRUCTION OF WORKS IN COMMUNAL LAND FOR CONSERVATION OF NATURAL RESOURCES

51 Interpretation in Part VII

In this Part—

"expenditure" means the expenditure incurred by the Minister in respect of the wages and feeding of persons employed in the construction of works, but does not include the amount of any such expenditure which the Board certifies as being payable by any person in terms of any order made under section *twenty-seven*;

"works" means any works constructed or to be constructed in any Communal Land in terms of this Part.

52 Minister may construct works in Communal Land

(1) The Minister may, on the recommendation of the Board, construct in Communal Land any works which he may deem necessary or desirable for the conservation of the natural resources, including the control of water tables and the disposal of irrigation drainage water, of land outside such Communal Land or within such Communal Land.

(2) The cost of the construction of such works shall, in the first instance, be paid from moneys appropriated for the purpose by Act of Parliament.

(3) Section *twenty-seven* shall apply, *mutatis mutandis*, in respect of the apportionment and recovery of the cost of such works:

Provided that no order for the payment of costs shall be made under that section against an inhabitant.

53 Imposition of levy on inhabitants

(1) For the purpose of recovering the expenditure on any works, such Minister as the President may, by notice in a statutory instrument, designate, may, after consultation with the local authority, from time to time impose a levy on such of the inhabitants as, in his opinion, may benefit from the construction of the works.

(2) The Minister may for good cause shown remit the whole or any part of the levy imposed upon any inhabitants.

(3) The proceeds of the levy shall be paid into the Consolidated Revenue Fund.

54 Recovery of levy

The amount of any levy imposed on any inhabitant shall be a debt due to the State and shall be recoverable by action in any court of competent jurisdiction.

55 Penalty for non-payment of levy

(1) Any inhabitant who fails to pay the amount of any levy imposed on him upon the demand of a local authority or any person authorized by the local authority to demand such amount shall be guilty of an offence and liable to a fine not exceeding twenty dollars or, in default of payment, to imprisonment for a period not exceeding thirty days.

(2) In addition to any penalty which it may inflict, the court convicting such inhabitant may, upon application by the prosecutor, give summary judgment for the amount of any levy due and unpaid by such inhabitant, and such judgment shall have the same force and effect and be executed in the same manner as if it had been given in a civil action duly instituted before a competent court.

56 Evidence

In any civil or criminal proceedings under this Act, a certificate alleging—

(*a*) the amount of the levy due and payable by the defendant or the accused, as the case may be; and

(*b*) that the defendant or accused failed to pay such levy on demand by a person named in the certificate;

shall, if issued by the local authority, be admissible in evidence in any court on production by any person and shall suffice as proof of any facts falling within the scope of paragraphs (*a*) and (*b*) unless sufficiently rebutted by other evidence or unless it is proved that it was not duly issued by the local authority.

PART VIII

GENERAL

57 Conservation councils

(1) The President may, by proclamation in a statutory instrument, for the area defined in such proclamation appoint a council, to be called a conservation council and the council shall be representative of the special interests of the said area.

(2) A conservation council shall confer with and advise the Board in regard to the conservation and improvement of natural resources within the area for which it is appointed.

58 Appointment of inspectors and conservation or other officers

(1) For the purposes of this Act—

(*a*) the Minister may appoint such inspectors and other officers as he may consider necessary; and

(*b*) the Minister responsible for agriculture may appoint such conservation officers as he may consider necessary.

(2) An inspector appointed in terms of subsection (1) shall, either on his own initiative or at the request of the Board, report to the Board on such matters as appear relevant to the objects and purposes of this Act and shall

CHAPTER 20:04

COMMUNAL LAND ACT

Acts 20/1982, 8/1985, 21/1985, 5/1988, 15/1989 (s. 32), 3/1992

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AN ACT to provide for the classification of land in Zimbabwe as Communal Land and for the alteration of such classification; to alter and regulate the occupation and use of Communal Land; and to provide for matters incidental to or connected with the foregoing.

[Date of commencement: 1st February, 1983]

PART I

PRELIMINARY

1 Short title

This Act may be cited as the Communal Land Act [*Chapter 20:04*]

2 Interpretation

In this Act—

"Communal Land" means land referred to as Communal Land in section *three*;

"inhabitant", in relation to any Communal Land or part thereof, means a person who is entitled, in terms of this Act, to reside in that Communal Land or part thereof;

"Minister" means the Minister of Local Government, Rural and Urban Development or any other Minister to whom the President may, from time to time, assign the administration of this Act;

"use", in relation to Communal Land, includes the erection of any building or enclosure, ploughing, hoeing, the cutting of vegetation, the depasturing of animals or the taking of sand, stone or other materials therefrom

PART II

COMMUNAL LAND

3 Extent of Communal Land

Communal Land shall consist of land which, immediately before the 1st February, 1983, was Tribal Trust Land in terms of the Tribal Trust Land Act, 1979 (No. 6 of 1979), subject to any additions thereto or subtractions therefrom made in terms of section *six*

4 Vesting of Communal Land

Communal Land shall be vested in the President, who shall permit it to be occupied and used in accordance with this Act

5 Description of Communal Land

(1) The Minister shall, by statutory instrument, publish a description of the area of Communal Land.

(2) The Minister may from time to time, by statutory instrument, amend any instrument published in terms of subsection (1), or any replacement of such instrument, in order—

(*a*) more clearly to describe the area of Communal Land; or

(b) to change the name or other designation of any Communal Land; or

(c) to correct any error in the description of any Communal Land.

(3) If the instrument referred to in subsection (1) has been amended in terms of subsection (2) or in terms of subsection (2) of section *six*, the Minister may, by statutory instrument, repeal and replace such instrument with a further instrument describing the area of Communal Land as at the date of such replacement and may thereafter, from time to time, likewise repeal and replace any instrument published in terms of this subsection.

(4) No statutory instrument published in terms of this section shall have the effect of transferring any land to or from Communal Land.

6 Additions to and subtractions from Communal Land

(1) Subject to this Act, the Forest Act [*Chapter 19:05*] and the Parks and Wild Life Act [*Chapter 20:14*], the President may, by statutory instrument—

(a) declare that any State Land shall form part of Communal Land;

(b) after consultation with any rural district council established for the area concerned, declare that any land within Communal Land shall cease to form part of Communal Land.

(2) Whenever the President has published a declaration in terms of subsection (1), the Minister shall, by statutory instrument, amend the instrument published in terms of subsection (1) or (3) of section *five*, as the case may be, to reflect such declaration.

(3) Whenever any land ceases to form part of Communal Land in terms of a declaration published in terms of subsection (1), such land shall thereupon become State land until it is granted, sold or otherwise disposed of in terms of this Act or any other law.

PART III

OCCUPATION AND USE OF COMMUNAL LAND

7 Restriction on right to occupy or use Communal Land

Subject to sections *ten* and *eleven*, no person shall occupy or use any portion of Communal Land—

(a) except in the exercise of any previously acquired right subsisting on the 1st February, 1983; or

(b) except in accordance with the terms and conditions of any right, consent or permit granted or issued, as the case may be, in terms of this Act or any other enactment; or

(c) unless he or she is a spouse, dependent relative, guest or employee of a person who occupies or uses Communal Land in terms of paragraph (a) or (b).

8 Occupation and use of Communal Land for agricultural or residential purposes

(1) Subject to this Act and the Regional, Town and Country Planning Act [*Chapter 29:12*] and any order issued in terms thereof, a person may occupy and use Communal Land for agricultural or residential purposes with the consent of the rural district council established for the area concerned.

(2) Subject to subsection (3) and the Regional, Town and Country Planning Act [*Chapter 29:12*] and any order issued in terms thereof, when granting consent in terms of subsection (1), a rural district council shall—

(a) where appropriate, have regard to customary law relating to the allocation, occupation and use of land in the area concerned; and

(b) grant consent only to persons who, according to the customary law of the community that has traditionally and continuously occupied and used land in the area concerned, are regarded as forming part of such community or who, according to such customary law, may be permitted to occupy and use such land:

Provided that, if no community has traditionally and continuously occupied and used land in the area concerned, the district council shall grant consent only to such class of persons as the Minister, by notice in writing to the district council, may specify.

(3) Officers and employees of a rural district council may, with the consent of the council, occupy and use Communal Land within the council area for the purposes of their employment, notwithstanding that they could not, by virtue of paragraph (b) of subsection (2), be permitted to occupy and use such land.

(4) Any person who is aggrieved by a refusal by a rural district council to grant consent in terms of subsection (1) may appeal to the President within such time and in such manner as may be prescribed by regulation.

(5) In any appeal in terms of subsection (4) the President may confirm, vary, set aside or reverse the refusal appealed against or make such other order in the matter as he thinks just.

(6) Where a rural district council is established for any area of Communal Land or any area of Communal Land is incorporated within the area of a rural district council, any person lawfully occupying or using land in such area for agricultural or residential purposes on the date of such establishment or incorporation, as the case may be, shall be deemed to have obtained the consent of such rural district council for the purposes of subsection (1).

9 Permits to occupy and use Communal Land

(1) A rural district council may, with the approval of the Minister, issue a permit authorizing any person or class of persons to occupy and use, subject to the Regional, Town and Country Planning Act [*Chapter 29:12*] and any order issued in terms thereof, any portion of Communal Land within the area of such rural district council, where such occupation or use is for any of the following purposes—

(a) administrative purposes of the State or a local or like authority;

(b) religious or educational purposes in the interests of inhabitants of the area concerned;

(c) hospitals, clinics or other such establishments for the benefit of inhabitants of the area concerned;

(d) hotels, shops or other business premises;

(e) any other purpose whatsoever which, in the opinion of the rural district council, is in the interests of inhabitants of the area concerned;

(2) A rural district council may, with the approval of the Minister—

(a) impose such conditions upon the issue of a permit in terms of subsection (1) as may be specified in the permit; and

(b) at any time, by notice in writing to the person to whom the permit was issued, cancel or vary a permit issued in terms of subsection (1) or any of the conditions subject to which it was issued.

(3) Any person who is aggrieved by—

(a) a refusal by a rural district council to issue a permit in terms of subsection (1) or to vary any permit or any condition thereof in terms of subsection (2), or

(b) the cancellation or variation of a permit or any condition thereof in terms of subsection (2),

may appeal to the Minister within such time and in such manner as may be prescribed by regulation.

(4) In any appeal in terms of subsection (3) the Minister may confirm, vary, set aside or reverse the refusal, cancellation or variation appealed against or make such other order in the matter as he thinks just.

10 Setting aside of Communal Land for certain purposes

(1) Subject to this section, the Minister shall set aside land contained within Communal Land for the establishment of—

(a) a township, village, business centre or industrial area, where such land is—

(i) designated for any such purpose in terms of a rural development plan approved by him and the Minister responsible for lands after consultation with the Director of Physical Planning and any rural district council established for the area concerned, or

(ii) the subject of a layout approved in terms of section 43 of the Regional, Town and Country Planning Act [*Chapter 29:12*],

or

(b) an irrigation scheme, where such land is designated for such purpose in terms of a rural development plan approved by him and the Minister responsible for lands after consultation with the Natural Resources Board established in terms of the Natural Resources Act [*Chapter 20:13*] and any rural district council established for the area concerned.

(2) Subject to this section, after consultation with any rural district council established for the area concerned, the Minister may set aside any land contained within Communal Land, other than land referred to in subsection (1), for any purpose whatsoever, including a purpose referred to in subsection (1), which he considers is in the interests of inhabitants of the area concerned or in the public interest or which he considers will promote the development of Communal Land generally or of the area concerned.

(3) Before any land is set aside in terms of subsection (1) or (2) the Minister shall publish a statutory instrument—

(a) describing the land concerned, and

(b) specifying the purpose for which the land concerned is to be set aside, and

(c) specifying the date with effect from which the land concerned will be set aside, and

(d) ordering all persons, or such class of persons as the Minister may specify in the notice, who are occupying or using the land concerned, otherwise than by virtue of a right held in terms of the Mines and Minerals Act [*Chapter 21:05*], to depart permanently with all their property from the land concerned within such reasonable period as the Minister shall specify in the notice,

and the Minister shall ensure that such steps are taken as appear to him sufficient to disseminate the terms of the notice within the area of the land concerned.

(4) Where any land is set aside in terms of subsection (1) or (2), the Minister may in regulations made in terms of section *fifteen*, provide for—

(a) charges and deposits to be made for any services, amenities or facilities provided by the State within or for any such land, whether or not any such service is used or not;

(b) supplementary charges in respect of immovable property within any such land, to cover the expenses incurred by the State in the maintenance and administration of such land;

(c) delegating to any rural district council within whose area the land is situated responsibility for collecting any rents, charges, deposits or supplementary charges on behalf of the State;

(d) generally, the terms and conditions subject to which any person may lease, occupy or use any such land.

(5) Regulations providing for charges, deposits or supplementary charges in terms of subsection (4)—

(a) may provide that the charges and supplementary charges shall be included in rents or charged separately; and

(b) may divide the persons who are liable to pay the charges, deposits or supplementary charges into classes and fix different amounts for different classes; and

(c) may vary any charges and deposits according to the use to which the premises concerned are put; and

(d) shall base every such supplementary charge upon a unit of land and additionally, or alternatively, a unit of residential or business accommodation, as the case may be, determined by the Minister and may vary such supplementary charge according to any or all of the following—

(i) the type of tenure under which the property is held;

(ii) the value of the property, whether based upon the value of the land or the improvements, or both;

(iii) the area of the property, being either that of the land or of the improvements;

(iv) the use to which the property is put.

(6) Any land set aside in terms of subsection (1) or (2) shall remain part of Communal Land unless the President, in terms of subsection (1) of section *six*, declares that it shall cease to form part of Communal Land.

11 Servitudes relating to water rights over Communal Land

Where any person has applied to the Administrative Court in terms of the Water Act [*Chapter 20:22*], for—

(a) a servitude of storage as defined in section 87 of that Act, and the exercise of such servitude would cause the inundation of any area of Communal Land, the Administrative Court may grant such servitude and, if necessary, any servitude of abutment, purification or passage as defined in section 78 of that Act; or

(b) a servitude of passage as defined in section 78 of that Act for the passage of water over any area of Communal Land, the Administrative Court may grant such servitude;

if the Minister, after consultation with any rural district council established for the area concerned, has consented to the grant of such servitude or servitudes, as the case may be, and any conditions fixed by him in giving his consent are made binding on the person to whom the servitude has been or the servitudes have been, as the case may be, granted.

(e) abolishing any demarcated forest.

(3) No land shall be declared to be demarcated forest unless it is—

(a) State land; or

(b) trust land and the trustees thereof have consented thereto.

(4) Any notice made in terms of paragraph (a), (b) or (c) of subsection (2) shall be laid before Parliament as soon as may be after it has been published and if a resolution is passed within the next twenty-eight days on which Parliament has sat next after the notice is laid before it requesting the President to rescind or vary the notice, it shall forthwith be rescinded or varied, as the case may be, by further statutory instrument but without prejudice to the validity of anything previously done thereunder.

(5) No notice may be made in terms of paragraph (d) or (e) of subsection (2) unless the proposal to make such notice has been approved by Parliament.

36 Minister may amend Third Schedule

(1) The Minister may, by notice in a statutory instrument, amend the Third Schedule in order to—

(a) more clearly describe such land; or

(b) correct any error in the description of or statement of extent of such land.

(2) The Minister may, by statutory instrument, amend Part III of the Third Schedule in order to add any land which is acquired by the Commission or delete any land which is no longer owned by the Commission.

(3) No notice made in terms of this section shall have the effect of transferring any land to or from the Forest Estate.

37 Owner of private land may apply for protection of forest

(1) The owner of any private land who has placed or intends to place such land or any portion of such land under a system of forest management approved by the Commission may make application to the Minister for a declaration that such land or such portion of such land shall be protected under this Act.

(2) Upon receipt of an application in terms of subsection (1), the Minister shall require the Commission—

(a) to submit a report on the area to which the application relates and to cause a sketch plan to be produced together with a written description, approved by the Surveyor-General, of the boundaries of such area;

(b) to cause a certified copy of such report, together with a copy of the plan attached thereto, to be deposited in the office of the local authority for the area and of the mining commissioner in whose district the area is situate. Such report and plan shall be available at such office during office hours for inspection by members of the public, free of charge;

(c) to cause—

(i) in the case of an indigenous forest, three months' notice; or

(ii) in the case of a plantation, whether already established at the date of the application or to be established thereafter, one month's notice;

of the intention to declare such area to be protected under this Act to be published on three consecutive occasions in the *Gazette* and in a newspaper circulating in the district in which the area is situate and to call upon any person who has any objection to the proposed declaration to lodge his objection in writing with the Minister within three months or one month, as the case may be, of the last publication of the notice in terms of this paragraph.

(3) The Minister after consideration of the application and objections, if any, may, if he is satisfied that the public interest will not be prejudiced thereby, by statutory instrument, declare that the area of private land described in such notice shall be protected under this Act.

(4) The Minister may at any time revoke any declaration issued in terms of this section if he is satisfied that the private land to which it relates is no longer under a system of forest management approved by the Commission or if the owner so requests.

38 Reservation of trees or forest produce

The Minister may, in respect of any State forest, by statutory instrument, declare any species of tree or any forest produce to be specially reserved and may in like manner revoke or amend any such declaration.

39 Protection of forest or trees from cutting

(1) Whenever, in respect of any land not being a State forest, the President deems it expedient in the public interest that any tree or the whole or any part of a forest or plantation shall be protected, the President may, by proclamation, declare such tree or such forest, part of a forest or plantation to be protected.

(2) The owner of any forest, plantation or tree in respect of which the President has exercised his power under subsection (1) shall be entitled to compensation for any loss resulting therefrom in such sum as may be mutually agreed upon or, failing agreement, as may be determined by arbitration.

40 Expropriation of land for forest and certain other purposes

Whenever, in the opinion of the President, any area of land is required for the production of forest produce, either by the conservation and management of forest produce existing on such land or by means of plantations, the President may expropriate such land on payment to the owner of the land of such sum as may be mutually agreed upon or, failing agreement, as may be fixed by arbitration:

Provided that the power of expropriation conferred by this section may only be exercised if the Natural Resources Board recommends the expropriation.

41 Certain acts prohibited

Unless authorized in terms of subsection (3) or (4) of section *forty-four*, no person shall—

(a) cut, fell, injure or destroy any forest produce in, or remove any forest produce from, any demarcated forest or protected private forest; or

(b) fell, remove or injure any tree or forest produce which is reserved in terms of section *thirty-eight*; or

(c) cut, injure or destroy any tree protected or any tree in any forest or plantation or part of any forest or plantation protected in terms of section *thirty-nine* except with the written consent of the Minister and subject to such conditions as he may determine.

42 Acts excepted from section 41

Nothing in section *forty-one* shall be deemed to prohibit—

(a) the owner of a protected private forest from exercising full rights of ownership in regard to such protected private forest;

(b) any act done with the permission or under the direction of the Commission;

(c) any act done in accordance with regulations.

(7) Notwithstanding anything to the contrary contained in the law relating to the Public Service, no officer in the Public Service shall be seconded to the Commission except for an indefinite period.

(8) The First Schedule shall apply to any employee of the Commission who is not on secondment from the Public Service.

28 Pension contributions to be deducted

Any contributions for pension purposes which are payable to the Consolidated Revenue Fund in terms of this Act by an employee of the Commission, whether on secondment from the Public Service or otherwise, shall be deducted from the emoluments of the employee concerned and forwarded by the Commission to the State.

29 Commission to contribute to Consolidated Revenue Fund

There shall be paid monthly out of the funds of the Commission to the Consolidated Revenue Fund such amount as may be determined by the Minister responsible for finance, after consultation with the Commission, in respect of the contributions for pension purposes paid to the Consolidated Revenue Fund by employees of the Commission.

30 Disability benefits

(1) Any enactment providing for the payment of compensation in respect of the injury or death of officers or employees of the Public Service shall apply, *mutatis mutandis*, in relation to contributors as though they were officers or employees of the Public Service.

(2) The Minister responsible for finance may recover from the Commission any compensation paid to a contributor or his dependants in terms of subsection (1).

(3) A contributor shall not be regarded as a workman for the purposes of the National Social Security Authority Act [*Chapter 17:04*].

(4) In this section—

"contributor" means an employee of the Commission who is paying contributions to the Consolidated Revenue Fund in terms of this Act, whether he is on secondment from the Public Service or otherwise.

31 Suspension, reduction or forfeiture of pension or gratuity

If any employee or former employee of the Commission who becomes entitled to a pension or gratuity or is in receipt of a pension under this Act—

(*a*) is found by a board appointed by the President for the purpose to have made improper use of or to have disclosed in an improper manner any information which he may have obtained in the course of his employment; or

(*b*) is found by a competent court to have been guilty of misappropriation of property of the Commission which would, if it had been discovered before he became entitled to a pension or gratuity, have rendered him liable to discharge or dismissal; or

(*c*) is found to have made a false statement for the purpose of obtaining a pension or gratuity or commutation of pension, knowing the statement to be false or not believing it to be true; or

(*d*) refuses to comply with a reasonable request made by the Commission to afford all assistance and information in his power relating to any appointment formerly held or class of duty formerly carried out by him; or

(*e*) solicits or, without the consent of the Commission, accepts, directly or indirectly, any gift of a pecuniary value after retirement in connection with his service;

the President may order that any right to any pension or gratuity to which that person has become entitled or the pension of which he is in receipt shall be suspended, reduced or forfeited.

32 Deduction from pension, gratuity, refund of contributions or other benefit

(1) The Minister responsible for finance may authorize the deduction from any pension, gratuity, refund of contributions, commutation of pension or other benefit payable under this Act to an employee of the Commission who has been discharged or dismissed for misconduct of an amount equal to any direct loss which the Commission has sustained by reason of the conduct of the employee on account of which the employee was discharged or dismissed from the service of the Commission.

(2) The Minister may authorize the deduction from any pension, gratuity, refund of contributions or other benefit to which a person or his estate is entitled under this Act of a liquidated amount which that person is liable to pay to the Commission.

(3) To facilitate the recovery of an amount due under this section, the Minister may order the commutation, in accordance with any enactment relating to the commutation of pensions payable to members of the Public Service, of all or part of the pensions payable to the member notwithstanding anything to the contrary contained in this Act.

PART III

FOREST ESTATE AND FOREST LAND

33 Forest Estate

(1) The Forest Estate shall consist of—

(*a*) forest land;

(*b*) demarcated forest on Rhodes Estates;

(*c*) land owned by the Commission specified in Part III of the Third Schedule.

(2) The Forest Estate shall be used for the purposes specified in this Act.

34 Forest land

(1) Forest land shall consist of State land which is declared to be a demarcated forest.

(2) The total extent of forest land shall not be reduced by more than one *per centum* of the total extent of forest land on the appointed day.

PART IV

DEMARCATED FORESTS, NATURE RESERVES, PRIVATE PROTECTED FORESTS, RESERVED AND PROTECTED TREES

35 Demarcated forest

(1) Each of the areas described in Parts I and II of the Third Schedule is hereby declared to be a demarcated forest which shall be known by the name specified in the Third Schedule.

(2) Subject to this Act, the President may, on the recommendation of the Commission, by notice in a statutory instrument, amend the Third Schedule for the purpose of—

(*a*) declaring a new demarcated forest and specifying the name thereof;

(*b*) changing the name of any demarcated forest;

(*c*) adding any area to a demarcated forest;

(*d*) subtracting any area from a demarcated forest;

(e) the district head of each Ministry and department of a Ministry within the district that the Minister may designate by notice in writing to the district administrator; and

(f) such further persons representing other organizations and interests as the Minister, on the recommendation of the district administrator, may permit.

(2) If there is no officer who is the senior officer or district head of any force, department or Ministry referred to in paragraph (*d*) or (*e*) of subsection (1), or if there is doubt as to which officer is the senior officer or district head, as the case may be, the Commander of the force or the head of the department or the Secretary of the Ministry, as the case may be, shall, at the request of the district administrator concerned, designate an officer in his force, department or Ministry to be the senior officer or district head of the force, department or Ministry in the district concerned.

(3) The persons appointed as members of a rural district development committee in terms of paragraph (*f*) of subsection (1) shall hold office at the pleasure of the Minister.

(4) The district administrator shall preside at all meetings of a rural district development committee at which he is present and, in his absence, the members present shall elect a district head of a Ministry or department referred to in paragraph (*e*) of subsection (1) to preside at the meeting.

(5) The functions of a rural district development committee shall be—

(a) to consider ward development plans submitted to it in terms of section *fifty-nine*; and

(b) to make recommendations to the council as to matters to be included in the annual development and other long-term plans for the district within which the council area is situated; and

(c) to prepare the annual district development plan for approval by the council and assist in the preparation of other long-term plans for the council area; and

(d) when instructed to do so by the council, to investigate the implementation of the annual development and other long-term plans for the council area; and

(e) to exercise such other functions in relation to the annual development and other long-term plans for the district as may be assigned to it from time to time by the council.

(6) A district development plan referred to in paragraph (*c*) of subsection (5) shall be prepared and presented to the council before the 31st May in every year.

(7) Subject to subsection (9), the district administrator shall fix the times and places of all meetings of a rural district development committee, and subsection (11) shall apply *mutatis mutandis*, to the convening of such meetings.

(8) A majority of the members referred to in subsection (1) shall form a quorum at any meeting of a rural district development committee.

(9) The chairman of the council may at any time direct that a joint meeting be held between the council and its rural district development committee for the purpose of considering and approving the district development plan referred to in paragraph (*c*) of subsection (5).

(10) A joint meeting referred to in subsection (9) shall be held at such place and time as the council chairman may direct, and he shall be the chairman of any such joint meeting.

(11) At least twenty-one days before a joint meeting referred to in subsection (9), the chief executive officer of the council shall send a notice stating the date, time and place of the joint meeting and the business to be transacted thereat to each member of the council and the rural district development committee, and shall display the notice at the places at which and in the manner in which notices of the council are normally displayed or in such other place and manner as may be prescribed in regulations.

(12) At any joint meeting referred to in subsection (9) every councillor and member of the rural district development committee who is present shall be entitled to one vote on every question before the meeting:

Provided that only councillors may vote on the final approval of an annual district development plan referred to in paragraph (*c*) of subsection (5).

61 Natural resources conservation committee and subcommittees

(1) Upon the recommendation of the Minister responsible for the administration of the Natural Resources Act [*Chapter 20:13*], the Minister may, by statutory instrument, declare that, with effect from a specified date—

(a) a council area or any part thereof shall be an intensive conservation area for the purposes of the Natural Resources Act [*Chapter 20:13*]; and

(b) the council shall be the natural resources conservation committee for such intensive conservation area.

(2) Upon a council becoming a natural resources conservation committee in terms of subsection (1)—

(a) sections 34 to 37 of the Natural Resources Act [*Chapter 20:13*] shall not apply to the council;

(b) any existing intensive conservation area wholly included within the council area shall be deemed to have been dissolved in terms of the Natural Resources Act [*Chapter 20:13*], and the conservation committee for such former intensive conservation area shall, subject to subsection (5), be deemed to have been appointed in terms of subsection (3) as a natural resources conservation subcommittee of the council for the area of such former intensive conservation area;

(c) where a portion of an existing intensive conservation area falls within the council area, that portion shall be deemed to have been severed from that intensive conservation area in terms of the Natural Resources Act [*Chapter 20:13*] and joined to the intensive conservation area formed by the council area

(3) For the better carrying out of its functions as a natural resources conservation committee, a council may, with the approval of the Natural Resources Board established in terms of the Natural Resources Act [*Chapter 20:13*], and shall, if directed to do so by the Minister—

(a) appoint one or more natural resources conservation subcommittees to exercise functions relating to natural resources within one or more wards of the council area; and

(b) delegate to any such natural resources conservation subcommittee all or any of its functions as a natural resources conservation committee in terms of the Natural Resources Act [*Chapter 20:13*].

(4) A natural resources conservation subcommittee appointed in terms of subsection (3) shall consist of—

(a) a chairman, who shall be the councillor for the ward or one of the councillors for the wards, as the case may be, for which the committee is established; and

(b) such other persons as are appointed or elected in terms of regulations made by the Minister with the consent of the Minister responsible for the

administration of the Natural Resources Act [*Chapter 20:13*].

(5) Within a year after a declaration in terms of subsection (1) or within such longer period as the Minister may permit, the council shall ensure that the boundaries of the area for which a natural resources conservation subcommittee is deemed to have been appointed in terms of paragraph (*b*) of subsection (2) are altered so that they coincide with the boundaries of one or more wards of the council area.

(6) The assets and liabilities of the conservation committee for any intensive conservation area of which a portion is included within the intensive conservation area of a council shall be apportioned between the committee and the council in such manner and in such proportion as may be mutually agreed upon by the committee and the council or, failing such agreement, as may be determined by the Natural Resources Board established in terms of the Natural Resources Act [*Chapter 20:13*].

(7) The assets and the proceeds from the sale, realization or other disposal of the assets which a council has acquired in terms of subsection (6) shall be applied only to the purposes in respect of which powers have been conferred upon a conservation committee in terms of the Natural Resources Act [*Chapter 20:13*] or to such purposes as may be prescribed.

(8) The Minister may, by a statutory instrument—

(*a*) upon the recommendation of the Minister responsible for the administration of the Natural Resources Act [*Chapter 20:13*], declare that, with effect from a specified date, any part of a council area which is an intensive conservation area shall cease to be part of the intensive conservation area; and

(*b*) make any consequential amendments he considers necessary to any notice previously made in a statutory instrument in terms of subsection (1) in respect of the intensive conservation area concerned.

(9) Where the Minister has made a declaration in terms of subsection (8), he may, after consultation with the Minister responsible for the administration of the Natural Resources Act [*Chapter 20:13*] and the council concerned, give directions as to any matter or thing arising from such declaration, including the apportionment of assets liabilities between the council and any conservation committee formed or to be formed in terms of the Natural Resources Act [*Chapter 20:13*] for the whole or part of the area which is excluded from the intensive conservation area in terms of that declaration.

(10) Whenever a council meets as a natural resources conservation committee, such meeting may be attended by a member of the Natural Resources Board established in terms of the Natural Resources Act [*Chapter 20:13*] or by any person authorized by the Natural Resources Board for that purpose.

62 Other committees of council

(1) Subject to this Act, a council may appoint such committees, whether of a general, special or local nature, as it may think fit, and may delegate to any such committee, subject to such terms and conditions as the council may think fit, any power that may be exercised by the council:

Provided that—

(i) the council shall appoint a committee whenever directed to do so by the Minister and shall delegate to the committee such functions as the Minister may direct;

(ii) the council shall not delegate to any committee—

(*a*) power to impose levies, rates, special rates, rents or charges, to borrow money, to expropriate property or to make by-laws; or

(*b*) unless the Minister has authorized such delegation, any power specified in paragraph 1 of the First Schedule.

(2) Subject to this Part, a council may continue, alter or discontinue a committee appointed in terms of subsection (1):

Provided that a council shall not alter or discontinue a committee referred to in proviso (i) to subsection (1) without the consent of the Minister.

(3) Every committee referred to in subsection (1) shall consist of—

(*a*) two or more councillors appointed to the committee by the council;

(*b*) such persons, other than councillors, who are enrolled on any voters' roll for a ward of the council area as the council may, in consultation with the committee, co-opt to be members of the committee:

Provided that the number of co-opted members shall not exceed the number of councillors.

(4) A person co-opted to be a member of a committee in terms of paragraph (*b*) of subsection (3)—

(*a*) shall hold office for such period and subject to such conditions as the council may fix; and

(*b*) shall not be eligible for appointment as the chairman of the committee; and

(*c*) shall be subject to section *forty-eight*, which shall apply, *mutatis mutandis*, to such member.

63 General provisions applicable to all committees

(1) In this section—

"committee" includes a natural resources conservation sub-committee.

(2) The chairman of the council shall be an *ex officio* member of every committee appointed or established by a council under this Act, but unless he has been specifically appointed or elected to a committee he shall not be entitled to vote or be elected as chairman of the committee.

(3) All powers vested in a committee in terms of this Act may be exercised at any duly convened meeting thereof at which no fewer than one-half of the whole number of members and, in any case, no fewer than two members, are present:

Provided that the presence of the chairman of the council solely in his capacity as an *ex officio* member of the committee shall be disregarded for the purposes of this subsection.

(4) Subject to sections *fifty-nine*, *sixty* and *sixty-one*, every committee—

(*a*) shall elect a chairman; and

(*b*) may elect a vice-chairman;

from among its members who are councillors.

(5) If, at any meeting of a committee—

(*a*) the chairman of the committee is absent, the vice-chairman shall act as chairman;

(*b*) both the chairman and vice-chairman of the committee are absent or the chairman is absent and no vice-chairman has been elected, the committee shall elect one of its members who is a councillor or, if there is no such councillor present, one of its other members, to act as chairman at that meeting.

(6) Any question before a meeting of a committee shall be determined by resolution passed by a majority of the

(8) A council shall advise every tenderer in writing whether or not his tender has been accepted.

80 Income-generating projects

(1) With the written approval of the Minister and subject to such terms and conditions as he may impose, a council may engage in any commercial, industrial, agricultural or other activity for the purpose of raising revenue for the council.

(2) The Minister, after consultation with the council concerned, may revoke any approval given in terms of subsection (1) or amend any term or condition of such approval and, where he has done so, may give the council such directions as he considers necessary in regard to the disposal of any assets or undertakings acquired or used by the council in carrying on the activity concerned.

(3) A council shall comply with any directions given by the Minister in terms of subsection (2).

81 Establishment of co-operatives

(1) Subject to any other enactment, with the written approval of the Minister and subject to such terms and conditions as he may impose, a council may—

(a) establish and foster co-operatives to carry on any commercial industrial, agricultural or other activity; and

(b) advance moneys and give other assistance to any co-operative.

(2) The Minister, after consultation with the council concerned, may give a council such directions as he considers necessary in regard to the carrying on of any activity by a co-operative referred to in subsection (1) or as to the winding up of any such co-operative.

(3) A council shall comply with any directions given by the Minister in terms of subsection (2).

82 Co-operation with local authorities and persons

(1) Subject to this section, a council may by agreement co-operate with the State or with any council local authority or other person for the better or more economic carrying out, either by any of the contracting parties or by the use of joint facilities, of any matter which the council may by law perform and in which the contracting parties are mutually interested.

(2) The terms and conditions of any agreement referred to in subsection (2) shall be embodied in a deed of agreement to be entered into and subscribed to by the contracting parties and shall, *inter alia*, as far as may be necessary or expedient, provide for—

(*a*) the date upon which the agreement shall come into force, the period for which it shall endure and the terms and conditions on which—

(i) any of the parties thereto may withdraw therefrom; and

(ii) the State or another local authority or other person may become a party thereto; and

(iii) the agreement may, during its currency, be terminated;

and

(*b*) the money, material, land, buildings or other property or things to be provided by each of the contracting parties, and the payment, if any, to be made therefor; and

(*c*) the charges, if any, to be borne by, and the revenue or profit, if any, payable to, each of the contracting parties; and

(*d*) the apportionment between the contracting parties of the revenues, profits, assets, losses and liabilities arising out of the operation of the agreement; and

(*e*) the raising of loans, subject to the approval of the Minister, either jointly or separately by the contracting parties, and the determination of their liability under, and generally the terms and conditions of, any such loan; and

(*f*) the management, control and execution of any matter forming the subject of the agreement; and

(g) the rights, powers, privileges and duties of each contracting party; and

(*h*) the amount of and the manner of fixing and collecting the charges, if any, to be paid in regard to any matter forming the subject of the agreement; and

(*i*) the making of regulations subject to any law, including this Act, conferring the power thereof, in regard to any matter forming the subject of the agreement; and

(*j*) the delegation by the contracting parties of any matter forming the subject of the agreement to one of their number or to a joint committee appointed by them.

(3) Where the Minister considers that the co-operation of any council with the State or with any other council, local authority or person for any purpose which they may by law perform would be of public or local advantage, he may make an order for the drawing up of an agreement for the purposes specified therein, and any such agreement shall, subject to subsection (4), be framed in accordance with subsection (2).

(4) Where any council, local authority or person objects to the exercise of the Minister's powers under subsection (3), the Minister shall appoint investigators in terms of section *one hundred and fifty-four* to hold an investigation into the objections and to report to him thereon, and provisions of that section shall apply accordingly.

(5) On receiving the report in terms of subsection (4), the Minister may make such order as he thinks fit.

(6) If the Minister has ordered a council in terms of subsection (5) to draw up an agreement such as is referred to in subsection (2) or (3), and the council fails or refuses to do so within such period as the Minister may direct, the Minister may enter into such an agreement on behalf of the council, and such agreement shall be binding on the council and the other party or parties thereto if it had been entered into by the council.

(7) If the agreement concerned so provides, a joint committee referred to in paragraph (*j*) of subsection (2) shall be a body corporate capable of suing and being sued in its own name and having such powers as may be conferred upon it by the agreement concerned.

83 Joint committees: by agreement

(1) Subject to this section, any council may, on such terms and conditions as may be agreed between the parties concerned, combine with any other council or local authority for any purpose which the parties may by law perform and in which they are jointly interested, including without prejudice to the generality of the foregoing, the purpose of conducting and managing their business and the employment of their officers and employees.

(2) Any agreement in terms of subsection (1) may, *inter alia*, provide for any or all of the following—

(*a*) the appointment of a joint committee of the councils and local authorities concerned, consisting of such number of councillors or members as is specified in

Example of RDC NRM By-Laws

Statutory Instrument 67 of 1996.

[ACT 8/88

Bulilimamangwe Rural District Council (Communal and Resettlement Land) (Land Use and Conservation) By-laws, 1996

ARRANGEMENT OF SECTIONS

Section

1. Title.
2. Application.
3. Interpretation.
4. Preparation and adoption of a plan.
5. Amendment of a plan.
6. Contents of a plan.
7. Sleighs.
8. Protection of natural resources.
9. Fencing and conservation works.
10. Evidence.
11. Offences and penalties.

IT is hereby notified that the Minister of Local Government, Rural and Urban Development has, in terms of subsection (4) of section 90 of the Rural District Councils Act, 1988, approved the following by-laws made by the Bulilimamangwe Rural District Council:—

Title

1. These by-laws may be cited as the Bulilimamangwe Rural District Council (Communal and Resettlement Land) (Land Use and Conservation) By-laws, 1996.

Application

2. These by-laws shall apply to communal and resettlement land within the Bulilimamangwe Rural District Council area.

Interpretation

3. In these by-laws—

"conservation works" means works undertaken by a conservation committee in terms of section 152 of the Natural Resources Act [*Chapter 150*];

"council" means the Bulilimamangwe Rural District Council;

"council area" means the area for which the council has been established;

"livestock" means cattle, donkeys, sheep and goats;

"owner" means—

(a) in the case of livestock, the person who normally has custody or control thereof;

(b) in the case of cultivated land, any person who has the right to the produce of the land, including the spouse of such person and children over the age of eighteen years;

"plan" means a diagram or illustration depicting or describing any area of land within communal or resettlement land areas set aside for exclusive use by inhabitants for residential, grazing and cultivation purposes;

"provincial administrator" means the provincial administrator for the province within which the communal and resettlement land concerned falls;

"provincial agritex officer" means the provincial agritex officer in the Ministry of Agriculture responsible for the province in which the communal or resettlement land falls, or any person in his office designated by him in writing to perform his functions;

"provincial planning officer" means the provincial agritex officer in the Department of Physical Planning of the Ministry of Local Government, Rural and Urban Development responsible for the province in which the communal or resettlement land falls, or any person in his office designated by him in writing to perform his functions;

"provincial warden" means the provincial warden of the Department of National Parks and Wildlife Management who is responsible for the province in which the communal or resettlement land falls, or any person in his office designated by him in writing to perform his functions;

"regional officer" means the regional officer in the Ministry of Environment and Tourism responsible for the region in which the communal or resettlement land falls, or any person in his office designated by him in writing to to perform his functions.

Preparation and adoption of a plan

4. (1) The council may prepare a plan for—

(a) all communal or resettlement land within the council area; or

(b) any ward or combination of wards in communal or resettlement land within the council area; or

(c) any part of a ward or wards in communal and resettlement land within the council area.

(2) If requested to do so by the village development committee or a headman, the council shall prepare a plan for the area for which the village development committee or headman concerned is responsible.

(3) Where a council intends to prepare a plan in terms of subsection (1), it shall cause the inhabitants of the area for which the plan is intended to be notified, in such manner as it considers appropriate, of its intention to prepare a plan and shall—

(a) make available for inspection by any of the inhabitants a draft proposal of the area plan; and

(b) call upon any inhabitant who has any objection to the proposed plan, to lodge his objection with the council within thirty days of the date of notification of the proposal.

(4) In preparing any plan, the council shall—

(a) seek the advice of—

(i) the provincial planning officer; and

(ii) the provincial agritex officer; and

(iii) the regional officer; and

(iv) the provincial warden;

and

(b) take into account any objections received in terms of subsection (3).

(5) If in preparing any plan, the council does not act in accordance with the advice given by any of the officers referred to in subsection (4) it shall advise the provincial administrator, in writing, of this fact and the reasons therefor.

(6) Once a plan has been prepared and approved by the council by resolution, a copy thereof shall be forwarded to the provincial administrator together with the substance of any—

(a) objections lodged in terms of subsection (3);

(b) advice tendered in terms of subsection (4).

(7) The provincial administrator may, within thirty days of the date a plan is forwarded to him in terms of subsection (6)—

(a) inform the council, in writing, of his approval of the plan; or

(b) inform the council, in writing, of his approval of the plan subject to any amendments he may propose.

(8) Where the provincial administrator makes proposals for the amendment of a plan, the council may—

(a) proceed in terms of subsections (3) and (4) of this section; or

(b) if it is not satisfied with the decision of the provincial administrator, appeal to the Minister, within thirty days of the notification of the decision. The Minister shall make a decision on the matter after calling for representations from all the parties concerned, including it necessary, the inhabitants of the area for which the plan is intended. The decision of the Minister on the matter shall be final.

(9) In describing areas in a plan, an area may be described by reference of the summits of hills, streams, rivers, roads, fences, buildings, communal boundaries, prominent rocks or trees or any other thing which is readily identifiable by, or is well known to the inhabitants of the area.

(10) A copy of an adopted and approved plan shall be available for inspection, free of charge, during normal working hours at the council offices and such other places as the council considers to be convenient and one copy shall be sent to each village development committee affected by the plan.

Amendment of plan

5. The provisions of subsections (3) to (8) of section 4 shall apply, *mutatis mutandis*, to any proposals to amend a plan.

Contents of a plan

6. (1) In respect of any area set aside in the plan for grazing, the council may, in the plan, specify—

(a) the maximum number of livestock which may be grazed in any grazing area;

(b) which owner or owners may graze livestock in a grazing area;

(c) the maximum number of livestock or the maximum number of different types of livestock which each owner may graze in a grazing area;

(d) the grazing within which inhabitants are to cease other activities within a grazing area;

(e) the period within which any inhabitant is to reduce the number of livestock to the level he is permitted to graze in any grazing area in terms of paragraph (c);

(f) the period within which any inhabitant is to cease grazing livestock within any area where such inhabitant is not permitted to graze livestock in terms of paragraph (d);

(g) measures appropriate for the conservation and proper use of any wildlife in the grazing area;

(h) the division of grazing land into paddocking for seasonal and rotational grazing;

(i) the sustainable utilization of thatch grass in the grazing ara; and

(j) the marking of arable land by fencing.

(2) In respect of any area set aside in a plan for cultivation, the council may, in the plan, specify—

(a) which inhabitants may cultivate in any cultivation area;

(b) the means or implements which may be used to cultivate in any cultivation area;

(c) the type of crops which may be grown and their rotation;

(d) the responsibility for removing noxious weeds;

(e) contour ridging schemes and other land protection and conservation measures;

(f) areas set aside as wood lots; and

(g) the date on which cultivation shall cease until certain land protection and conservation measures have been implemented.

Sleighs

7. No person shall own, possess, use or have in his custody or control a sleigh.

Protection of natural resources and vegetation

8. (1) The council may make orders controlling all or any of the following matters—

(a) the cutting of trees;

(b) the harvesting of mopani worms;

(c) the collection of firewood;

(d) the cutting of timber;

(e) the harvesting of thatch grass;

(f) the picking of indigenous plants;

(g) the hunting and removal of wildlife; and

(h) the removal of ostrich eggs;

within the communal or resettlement areas.

(2) An order made in terms of subsection (1) may be addressed to a particular person orally or in writing or may be of general application throughout the communal or resettlement areas within the council area.

(3) An order which is intended to be general application throughout the communal or resettlement areas shall—

(a) be recorded in a book kept for that purpose; and

(b) specify the date upon which it is to come into operation; and

(c) specify and describe the area affected; and

(d) be read out at a public meeting of the council called for that purpose; and

(e) be signed, dated and certified by the person who read it in terms of paragraph (c) as having been read out in terms of that paragraph.

(4) For the purposes of paragraph (c) of subsection (3), the provisions of subsection (9) of section 4 shall apply *mutatis mutandis*, to the description of the area referred to in that paragraph.

(5) An order—

(a) addressed to an individual shall come into operation immediately;

(b) having general effect shall come into operation one week after the order is read out in terms of paragraph (d) of subsection (3).

(6) The book in which orders are recorded in terms of paragraph (a) of subsection (3) shall be available for inspection at the council offices by any inhabitant of the affected area during normal working hours.

(7) An order made in terms of this section may be amended or revoked by the council.

Fencing and conservation works

9. Any person who—

(a) damages, destroys or removes any fence within a communal or resettlement area or on the boundary of a communal or resettlement area; or

(b) damages or destroys any conservation works in any area to which these regulations apply;

shall be guilty of an offence.

Evidence

10. (1) If any livestock is found grazing in an area other than a grazing area the owner shall be presumed to have allowed the stock to so graze:

Provided that it shall be a sufficient defence if the owner proves that he took all reasonable precautions to ensure that the stock do not graze outside the grazing area.

(2) The holder of a dipping card upon which is recorded the number of cattle which he dips shall be deemed to have the custody or control of the number of cattle recorded upon his dipping card until the contrary is proved.

(3) No plan or part thereof shall be deemed to be invalid because it is not possible to determine the exact situation on the ground of the boundary of any grazing or cultivation area:

Provided that no person shall be convicted of an offence in terms of paragraphs (a), (b), (c) or (f) of subsection (1) of section 11 unless it can be shown that the land in respect of which the charge arose falls clearly within or outside the area concerned.

(4) The book in which orders are recorded in terms of subsection (3) of section 8 shall be admissible in court, and shall constitute *prima facie* evidence of—

(a) any order recorded therein; and

(b) the due observance of subsections (3) and (5) of section 8, in respect of any such order.

Offences and penalties

11. (1) Any person whether an inhabitant or otherwise, who within the area covered by a plan—

(a) grazes his livestock in any area other than a grazing area; or

(b) grazes his livestock in a grazing area when he is not permitted by the plan to do so; or

(c) exceeds the number of livestock he is permitted to graze, or grazes livestock of the type prohibited by the plan; or

(d) fails to destock at the rate and within the period stipulated in the plan; or

(e) fails to remove his livestock within the stipulated period in the plan; or

(f) cultivates in an area other than a cultivation area; or

(g) fails to carry out any land protection measures which have been assigned to him in a plan; or

(h) contravenes any term, condition or control measure in a plan; or

(i) removes, collects, cuts, harvests or hunts natural resources or vegetation within the council area without the authority of the council, shall be guilty of an offence.

(2) Any person who contravenes any provision of these by-laws or any order made in terms of section 8 shall be guilty of an offence.

(3) Any person who is convicted of three or more offences under subsection (1) may have his rights under the plan revoked by the Council.

(4) Any person who is guilty of an offence in terms of these by-laws shall be liable to a fine not exceeding five hundred dollars or to imprisonment for a period not exceeding twelve months or both or such fine and such imprisonment.

Supplement to the Zimbabwean Government Gazette dated the 3rd May, 1996. Printed by the Government Printer, Harare.

Stephanie Coulter

From: John J. Jackson, III [jjw-no2@att.net]
Sent: Monday, April 21, 2014 12:07 PM
To: Regina Lennox; Stephanie Coulter
Subject: Fwd: Fwd: Elphant - Zimbabwe

Follow Up Flag: Follow up
Flag Status: Flagged

-------- Original Message --------
Subject: Fwd: Elphant - Zimbabwe
Date: Mon, 14 Apr 2014 09:52:03 -0500
From: John J. Jackson, III <cf@conservationforce.org>
To: Tim Vannorman <Tim_Vannorman@fws.gov>
CC: Bryan Arroyo - FWS <bryan_arroyo@fws.gov>, Dan Ashe <dan_ashe@fws.gov>

FYI - Re: Elephant Importation Suspension.

--
John J. Jackson, III
CONSERVATION FORCE
3240 S. I-10 Service Road W., Suite 200
Metairie, Louisiana 70001
Tel: (504) 837-1233
Fax: (504) 837-1145
jjw-no@att.net
www.conservationforce.org

-------- Original Message --------
Subject: Elphant - Zimbabwe
Date: Sat, 12 Apr 2014 22:16:54 +0200
From: Gerhard Damm <gerhard@muskwa.co.za>
Reply-To:<gerhard@muskwa.co.za>
Organization: Muskwa
To: John J. Jackson, III <cf@conservationforce.org>
CC: Nigel Leader-Williams <n.leader-williams@ukc.ac.uk>

Leader-Williams N. Elephant Hunting and Conservation, Science, 293(5538) 2203b-2204. DOI: 10.1126/science.293.5538.2203b

In a 2011 letter to Science magazine, Leader-Williams pointed out that the implementation of controlled, legalized hunting was also beneficial for Zimbabwe's elephants. "Implementing trophy hunting has doubled the area of the country under wildlife management relative to the 13% in state protected areas," thanks to the inclusion of private lands, he says. "As a result, the area of suitable land available to elephants and other wildlife has increased, reversing

the problem of habitat loss and helping to maintain a sustained population increase in Zimbabwe's already large elephant population."

Best

Gerhard

Gerhard R Damm
International Council for Game and Wildlife Conservation CIC
President - Division Applied Science
PO Box 411 – Rivonia 2128 – South Africa
Telephone: +27-11-883-2299; Fax: +27-11-784-2074
Email: gerhard@muskwa.co.za
Web: www.cic-wildlife.org
Skype: muskwa

AFRICAN INDABA the free bi-monthly e-Newsletter for hunter-conservationists and people who are interested in the incentive-driven-conservation of Africa's wild natural resources. Read cutting-edge news at www.africanindaba.com

Global Summit:
"Hunters United against Wildlife Crime"
Date: 24th April, 2014, Time: 13:30 18:00
Venue: Milan Marriott Hotel, Italy, room "Washington A"

[STOP WILDLIFE CRIME]

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Stephanie Coulter

From: John J. Jackson, III [jjw-no2@att.net]
Sent: Monday, April 21, 2014 12:06 PM
To: Regina Lennox; Stephanie Coulter
Subject: Fwd: Letter from Robin Hurt

Follow Up Flag: Follow up
Flag Status: Flagged

-------- Original Message --------
Subject: Letter from Robin Hurt
Date: Mon, 14 Apr 2014 09:31:45 -0500
From: John J. Jackson, III <cf@conservationforce.org>
To: Tim Vannorman <Tim_Vannorman@fws.gov>
CC: Bryan Arroyo - FWS <bryan_arroyo@fws.gov>, Dan Ashe <dan_ashe@fws.gov>

Tim,

FYI, see email below from Robin Hurt.

Sincerely,
John

John J. Jackson, III
CONSERVATION FORCE
3240 S. I-10 Service Road W., Suite 200
Metairie, Louisiana 70001
Tel: (504) 837-1233
Fax: (504) 837-1145
jjw-no@att.net
www.conservationforce.org

-------- Original Message --------
Subject: Fwd: US FWS Sport Hunted Elephant Trophy Ban Announcement - TZ and ZW Ele - 2014
Date: Sun, 13 Apr 2014 07:27:38 +0100
From: Robin Anthony Hurt [(b) (6) [redacted]
To:ROBIN HURT <(b) (6) [redacted]>
CC: John J. Jackson, III <jjw-no@att.net>, Chrissie Jackson <cjackson@conservationforce.org>, Michael Angelides <executiveofficer@africanpha.org>, Mohamed TAHOA <alm@cats-net.com>

FINAL CORRECTED letter . Please use this . Robin
>
>
> AN OPEN LETTER TO THE U.S. FISH AND WILDLIFE SERVICE .
>
>

> Ref . The US Fish and Wildlife Service suspension (ban) on importation of elephant trophies hunted in 2014 by sport hunters in Tanzania and Zimbabwe into the USA.
>
>
>
> Yes , Africa has a serious poaching problem , fuelled by recent unprecedented demand .
> Your suspension is in fact causing a ' ban ' on American citizens hunting Elephant in Tanzania and Zimbabwe . Even though Governments of both countries see the need to allow continued licensed hunting . No hunter will go all the way to Africa on an expensive safari , if they can't take their trophy home . Safari hunters unlike poachers , are selective - they are not killers bent on a quick financial return - on the contrary , they are prepared to pay large sums of money for the privilege of legally hunting and keeping the trophy of a selected animal .
> Bans don't work . Bans are not a solution . Rather encourage better management and anti poaching . More importantly find a solution to dealing with the end users , who are the cause of the poaching problem in the first place .
> I have witnessed first hand the negative results of 3 African Hunting Bans . Having been first licensed in Tanzania as a Professional Hunter in 1963 , I have been a full time professional hunter ever since , no only in Tanzania , but at one time or another in most African countries that allowed hunting . I state this in the interests of sharing the changes I have seen caused by hunting bans .
> Briefly . Safari Hunting is an important wildlife management tool in Africa . It produces important revenue from legitimate licensed hunting take off of surplus game animals to Governments , Conservancies and Safari operators . It hugely contributes to the financial well being , and food supply , to people who live on a day to day basis with wild animals , in and around wild life areas . It helps fund and pay for anti poaching efforts by Safari companies , Conservancies and Governments . It mostly utilises old animals , often beyond breeding age . American Safari hunting clients contribute about 60% of the revenue earned through sport hunting in Tanzania and Zimbabwe . Your suspension will seriously erode revenue that is so badly needed in Zimbabwe and Tanzania to help fund anti poaching . The cancellations following will cause financial loss to conservancies where the local people will not understand your reasoning for the suspension - some will simply just turn to
poachi

ng to compensate their losses .
> You know all this .
>
> But , what you may or may not know is the negative results of prior hunting bans .
> Namely :-
>
> TANZANIA IN 1973 - at that time there were an estimated 380,000- elephant , and 18,000- black rhino . By the time the Government reopened hunting in 1983 , the elephant population had declined to about 80,000- and rhino to less than 100 animals . The Tanzanian Government realised that the ban was a mistake , leaving the wilderness wide open to commercial poaching , and reopened safari hunting in 1983 . The elephant population immediately started to recover , increasing up to an estimated 130,000- animals in 2009 , prior to the current poaching . No doubt this number has dropped , but your suspension will only serve to exacerbate the
> problem .
>
> KENYA IN 1977 - at that time there were an estimated 176,000- elephant , and over 8000- black rhino . Today there are various estimates , but probably an accurate one would be somewhere in the region of 20,000 + - elephant , and about 500 + - rhino . Kenya remains closed to Safari Hunting , and has the embarrassment of loosing over 150,000- elephant and 7,500- black rhino ! All in a period of no legal hunting . Poaching is , and continues to be , rife .
>
> DEMOCRATIC REPUBLIC OF CONGO - (FORMALLY ZAIRE) - formally the largest strong hold of the forest elephant , Safari Hunting was banned in 1984 . It remains closed to this day . Since that closure the northern white rhino has completely disappeared , and is

probably extinct . Forest elephant are now a rarity in that country . Again all in a period of NO legal hunting .
>
> There is a message here . Taking legal hunters who are legitimate managers of wildlife out of the bush creates a vacuum of empty wilderness , that is soon filled by illegal thieves of wildlife -
> poachers .
>
> Yes there is a huge poaching problem in Africa today , wherever there are elephant and rhino . Not only Tanzania and Zimbabwe . But , I can assure you that if you remove the legal presence of Safari Hunters from the bush , which is what will happen as a side effect of your
> suspension ,poaching will increase at an alarming rate . That could threaten the very existence of elephant in Tanzania and Zimbabwe .
>
> All of us have the common interest of the well-being of all wildlife , not just elephant . A professional hunter is most motivated to look after and steward his or hers wildlife . Their very livelihood and way of life depends on this .
> A remedy to counteract poaching ? The following may be worth considering :-
> * Instead of an outright punitive suspension , encourage proper management practices . Liaise with African Governments , work with them and assist them , rather than antagonise them with importation bans . Part of the problem is that often legal hunting and wildlife theft through poaching are lumped together under one ' umbrella ' , because of misinformation . Legal licensed hunting is conservation , poaching is simply stealing .
> * Target and punish the end users and dealers who after all are the villains and cause of this poaching scourge . It often seems to be the legal hunters who are targeted , yet the real criminals seem to get away scot free - this needs to change !
> * Help fund anti poaching . Tanzania and Zimbabwe have limited resources . Anti poaching is hugely expensive . The US can make a huge difference by helping to fund anti poaching programs in the field .
> * Educate and involve local human communities in the value of conserving wildlife , whether through wise sustainable use ,or photographic safaris . Both are equally important in giving wild animals real long term value .
>
> Lastly , if the US importation suspension on sport hunted elephant is not lifted , then an undoubted increase of poaching will be the result in both Zimbabwe and Tanzania . Who will then accept the responsibility for that ? The US Fish and Wildlife Service ?
>
> Yours Sincerely ,
>
> Robin Hurt .
> P O BOX 8325 ,
> ARUSHA ,
> TANZANIA .
>
>
>
>

Mr. John J. Jackson, III
CONSERVATION FORCE
3240 S. I-10 Service Road W., Suite 200
Metairie, Louisiana 70001

April 9, 2014

Dear Mr. Jackson:

The African Professional Hunters Association is alarmed by the decision of **U.S. Fish and Wildlife Service** announcement on Friday, April 4, 2014 to unilaterally ban the importation of sport-hunted elephant trophies from Zimbabwe and Tanzania. Cancelled safaris will result in loss of revenue, massive unemployment and hardship to thousands of village people who rely on the safari industry to provide a quality of life not achievable through alternative forms of land use.

In addition to the injection of revenue into the village economy is the economic contribution hunters make to all the ancillary services used by visitors to Africa, hotels, airlines, air charter companies and many more. Elephant hunts in Tanzania require the hunter to purchase a 21day license, this also means that hunters are required to book a 21 day hunt, resulting in a substantial contribution in conservation dollars and employment for many people. In Africa, those living in rural areas that have a job are to a large extent supporting at least 15 other family members.

Elephant are one of Africa's iconic animals and attract serious hunters who are prepared to put large sums of money into conservation. It goes without question that any conservation minded hunter is concerned at the massive upsurge in illegal killing of Africa's iconic species and understands the need

to somehow control the perpetrators. Banning the import of legally hunted elephant trophies, removes the revenue that is used to curb the exploitation of wildlife resources, thus giving poachers and traders unrestricted freedom to carry out their ruthless trade with little chance of being apprehended and brought to justice. It is well known that safari operators in Tanzania play a huge role in apprehending poachers in significant numbers by supporting the underfunded Wildlife Division with transport, manpower, air support, logistics and donation of vehicles and weapons.

The cost of managing hunting areas is covered by tourist hunters and in some cases by donors and hunting clubs. Block fees, conservation fees, hunting licenses and trophy fees are all forms of substantial revenue to Government. In addition, it is mandatory that hunting operators make substantial contributions to village projects and benefit schemes. Government has a cost in providing administrative and field support but the cost of this support is covered by fees and taxes levied upon safari operators and their clients. In some cases, tourist hunting forms an important component of Community-Based Conservation, which aims to devolve responsibility for the sustainable use and management of wildlife resources to local levels.

Many hunting blocks in Tanzania and also other parts of Africa have been substantially rehabilitated by the wise use of hunting dollars and the operators are now able to provide not only tourist hunting but non-consumptive forms of safaris as well. This has increased revenue and helped to make these areas viable.

Understanding the context within which tourist hunting occurs is critical to understanding its potential to benefit conservation. In many parts of the world, much wildlife exists outside of national parks and protected areas. Wildlife shares land with people, and typically competes for space and environmental resources with other forms of land uses, such as agriculture and pastoralism, upon which the livelihoods of local people depend.

African Professional Hunters Association
1426 Rembrandt Road – Boulder – CO 80302
Tel: 303-447-1195

Wildlife can impose serious costs on local people, including physical harm, damaging crops, and competing with livestock. Where wildlife provides few benefits to local people it is often killed (legally or illegally) and its habitats are degraded or lost to other forms of land use. In some circumstances hunting can address this problem by effectively making wildlife more valuable than other forms of land use. It can return benefits to local people, encouraging their support for wildlife, and motivating investment at community levels.

Please try to get USFWS to see the importance of how necessary it is for hunters to continue the funding of conservation projects in rural areas. Without the huge contribution made by elephant hunters, areas will no longer be afforded present levels of protection and poaching of elephant, rhino and lion will escalate.

Yours sincerely,

Charles Williams

Executive Vice President

African Professional Hunters Association
1426 Rembrandt Road – Boulder – CO 80302
Tel: 303-447-1195

African Professional Hunters Association
1426 Rembrandt Road – Boulder – CO 80302
Tel: 303-447-1195

Professional Hunters' Association of South Africa
Professionele Jagtersvereniging Van Suid-Afrika
PO Box 10264, Centurion, 0046, South Africa Tel: +27 (0) 12 667 2048 Fax: + 27 (0) 12 667 2049
E-mail: info@ phasa.co.za Website: www.professionalhunters.co.za

Responsible hunting for sustainable life & livelihoods

17 April 2014

The Honorable Daniel Ashe
Director, United States Fish and Wildlife Service
Department of the Interior
1849 C Street, NW
Washington, DC 20240

Dear Director Ashe,

RE: Suspension of Import of Elephant Trophies from Tanzania and Zimbabwe

SUSPENSION OF IMPORT OF ELEPHANT HUNTING TROPHIES TAKEN IN TANZANIA AND ZIMBABWE IN 2014

1. We note from your press release dated 4 April 2014 and also your "Questions & Answers" document that you advance a number of reasons and suppositions on which you base your decision to implement your suspension.

2. We submit, with respect, that your reasons and/or suppositions are neither sound nor based on fact nor do they make any conservation sense. In certain instances the reasons and suppositions seem to be contradictory.

3. You state for instance "*a lack of effective law enforcement ... resulted in uncontrolled poaching and catastrophic population declines of African elephants*". We acknowledge that such a lack, insofar as it may be present in certain areas, is problematic, but we submit that your suspension will in fact contribute to a massive, full scale breakdown in law enforcement. It is well documented that controlled hunting areas comprise the largest percentage of Africa's wildlife areas and also often form buffer zones around national parks and reserves. It is furthermore a well-documented fact that the hunting companies that operate in these areas form the first and most effective line of law enforcement defence in these areas. Your suspension will result in such a significant financial loss for these companies that many of them will be forced to either withdraw from their controlled hunting areas or to suspend or scale down their anti-poaching programmes. The ensuing vacuum will be devastating, not only for elephant populations but for all wildlife populations and the ecology as a whole. Historical evidence shows that poaching escalates at alarming, exponential rates in such a vacuum. See for instance the well-documented declines in wildlife populations in Kenya, Tanzania and the DRC during periods of sport hunting bans.

4. You state that you base your decision in respect of Zimbabwe on *"limited data"* and *"anecdotal evidence"* and then conclude that *"Zimbabwe's elephants are also under siege."* We are extremely concerned that you are prepared to make such a far-reaching decision based on such data and evidence. You refer to one specific incidence of poaching (of which the correctness of your figures is also disputed) without advancing any evidence that there is a systemic poaching problem in Zimbabwe. We are furthermore concerned that you may not have considered all the scientific evidence relevant to Zimbabwe. There are a number of scientific studies, by reputable scientists, that suggest that Zimbabwe's elephant populations are in fact on the increase. Others suggest that any decline in certain local populations, if there is such a decline at all, may be the result of natural, cyclical circumstances or habitat destruction as a result of elephant overpopulation. These studies should, in our opinion, be considered when one considers the *"current situation on the ground"*.

5. It is to be noted that the poaching incident that you refer to was, to the best of our knowledge, discovered by hunting operators and that the perpetrators were caught, through the direct intervention of the hunting outfitters in the area, and duly convicted and sentenced.

6. You state that: *"Additional killing of elephants in these countries, even if legal, is not sustainable and is not currently supporting conservation efforts thot contribute towards the recovery of the species."* And then go on to state that *"Legal, well-regulated sport hunting, as part of a sound management program, can benefit the conservation of listed species by providing incentives to local communities to conserve the species and by putting much-needed revenue back into conservation.* (Our emphasis.) We fully agree with your last-mentioned statement but fail to understand on what basis you proclaim the opposite in your first-mentioned statement.

7. You advance no evidence to suggest that legal elephant hunting in Tanzania and Zimbabwe is *"not sustainable"*.

8. In your "Questions & Answers" document you state that *"Tanzania's and Zimbabwe's elephants face an uncertain future."* We submit, again with respect, that your decision will only lead to much higher levels of uncertainty, nothing else. It goes without saying that your decision will cause a major collapse in the long-term viability of the hunting industries of the countries in question, something that is of paramount importance in order to secure a certain future for Africa's elephants and wildlife. It is well documented that without a healthy hunting industry the following will happen:

    8.1 Anti-poaching patrols and law enforcement by hunting companies will be scaled down or terminated in millions of acres of wildlife areas due to lack of funding (generated through lawful hunting) or due to hunting operations withdrawing from areas.

    8.2 Government Game Departments will lose funding (loss in license and concession fees) which will have a direct effect on their ability to implement anti-poaching and law enforcement measures.

8.3 Poor, rural communities will lose revenue generated through legal hunting that may cause these communities to turn to commercial (read ivory) poaching and bush meat poaching in order to replace the lost income.

8.4 Poor, rural communities will no longer place a value on elephants in particular and, since they derive no income from them, will have no incentive to protect these animals. Human/wildlife conflict incidents will increase which will lead to a growing number of animals being killed, either by community members themselves or by the Game Departments as part of damage control measures. Communities will also be reluctant to report any poaching problems to the authorities or hunting companies.

8.5 Withdrawal of the hunting companies may lead to higher levels of corruption that will result in increased levels of wildlife crime.

9. PHASA represents more than 1200 members and is the largest global body representing professional hunters and hunting outfitters. Our members spend most of their time in wildlife areas throughout Africa and have extensive knowledge of the *"current situation on the ground"*.

10. We submit, with respect, that your suspension will have a devastating effect on the elephant populations and wildlife of Tanzania and Zimbabwe. It will also damage the hunting industries in other African countries to some degree or another leading to similar problems there.

11. We urge you to consider an immediate reversal of your decision.

12. We share your concern for Africa's wildlife and we therefore urge you to seek solutions to conservation challenges in Africa in conjunction with African governments and recognised conservation bodies. Implementing measures that will further hamper or may even put and end to effective and pragmatic wildlife conservation will not solve the problem on the ground in Africa.

Yours Faithfully

Hermann Meyeridricks
President

(Ms) Adri Kitshoff
Chief Executive Officer

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

SAFARI CLUB INTERNATIONAL	)	
	)	
Plaintiff,	)	Civ. No. 14-cv-00670(ABJ)
	)	
v.	)	
	)	
SALLY M. R. JEWELL, et al.	)	
	)	
Defendants	)	
	)	

DECLARATION OF RICHARD RAYMOND CAPOZZA

I, Richard Raymond Capozza, being first duly sworn on oath, depose and state as follows:

1. I am an environmental attorney from Skaneateles, New York.

2. I have been a member of Safari Club International since the early to mid-1990s.

3. I am or have been a member of Dallas Safari Club, Ducks Unlimited, Boone & Crockett Club, American Wildlife Conservation Foundation, Grand Slam/OVIS Club, and the International Council for Game and Wildlife Conservation.

4. I am the Chair of the Honorary Advisory Council of the Roosevelt Wild Life Station. The station was created in 1919 to honor Theodore Roosevelt and his conservation legacy. The station is the only memorial bearing Roosevelt's name that was personally approved by him during his lifetime. The original Honorary Advisory Council included members of the Roosevelt family and leaders of the 20th century North American conservation movement including Gifford Pinchot, George Bird Grinnell and George Shiras III. In 2013, the Honorary Advisory Council was reestablished to help guide and support the station's research and training programs to meet the pressing issues of wildlife conservation and management today. I have also held leadership positions at the state and local level of Ducks Unlimited in New York State, and served as President of the Central New York Wildfowlers Association, a regional waterfowl and wetlands conservation organization founded in 1960. I have donated hundreds of hours of volunteer to wildlife conservation and hunting causes including support for initiatives of Conservation Force. I regularly speak at local schools on wildlife conservation and the benefit of hunting to both wildlife and local communities, particularly poor, rural communities in Africa.

5. I am 48 years old and have been hunting for over three decades. I started hunting with my father.

6. I have hunted extensively throughout the United States and Canada including Alaska, Hawaii, Utah, Arizona, Texas, New Mexico, Montana, North Dakota, New York, Maryland, the provinces of Ontario, Saskatchewan, Alberta and the Yukon Territory. I have hunted in Europe – Spain, Scotland and England and in Africa – Tanzania and Zimbabwe. I have hunted for Dall sheep, Stone sheep, Rocky Mountain bighorn, elk, mule deer, white-tailed deer, Kodiak brown bear, antelope, mountain lion, free range/pure bred European mouflon and axis deer, Gredos ibex, red stag, Cape buffalo, lion, leopard, elephant and numerous plains game species in Africa. I have hunted wild turkey (Eastern and Rio Grande), ruffed grouse, woodcock, numerous species of waterfowl, pheasant, red grouse, red legged partridge, sand grouse, pigeons and doves.

7. I hunted in Tanzania in October 2005 in the Usangu Game Reserve. I hunted for Cape buffalo, eland, sable antelope, roan antelope, kudu, waterbuck, bushbuck, impala, hyena, crocodile, warthog, bushpig, honey badger, hartebeest and zebra.

8. I hunted in Zimbabwe in September 2008 in the Chewore South Safari Area. I hunted for Cape buffalo, leopard (unsuccessfully), zebra, impala and elephant (chose not to shoot). I also hunted in Zimbabwe in May and June 2012 in the Dande East and Ward 11 Communal Areas. I hunted for lion, leopard, sable antelope, kudu, Cape buffalo, hyena, grysbok, impala and birds.

9. I had an opportunity to harvest an elephant in Zimbabwe in 2008, but I chose not to due to the uncertainty caused by the financial crisis of 2008 which hit while I was on my hunt..

10. I had an elephant hunt booked in Zimbabwe in the Dande Safari Area for August 2014, but I canceled it due to the trophy importation ban imposed by the U.S. Fish and Wildlife Service on April 4, 2014.

11. In both 2008 and 2012, I observed large numbers of elephants both in the Chewore South Safari Area and the Dande East and Ward 11 Communal Areas. In Chewore South, in my opinion, there were too many elephants as there were significant signs of overgrazing and tree damage throughout the concession. However, the herds appeared to be very healthy and we saw numerous cows with calves and had to repeatedly avoid them. I saw no evidence of poaching in 2008.

12. In 2012 in the Dande East and Ward 11 Communal Areas, there were again large numbers of elephants in Dande East and the herds appeared very calm and healthy. I saw one herd estimated at 300 cows, calves and young bulls near the border of Mozambique. I saw elephants every day. I saw no evidence of recent elephant poaching when I was there. I did, however, see evidence of old signs of elephant poaching by Mozambique poachers (old blinds over waterholes, old elephant bones with hatchet marks ,etc.). A successful elephant hunter in Dande East who hunted just prior to me in 2012 removed a

homemade cut bullet from his elephant. I removed a similar homemade bullet from my Cape buffalo. These were the result of homemade muskets that were used by Mozambique poachers in the area prior to anti-poaching efforts described in paragraph 13. My Cape buffalo also had an old scar around his neck from a snare. These were old wounds that had healed.

13. I have witnessed firsthand the benefits of hunter-generated revenues that support rural, community-based conservation and anti-poaching programs in northern Zimbabwe in the communal area of Dande East. I stayed in the Kurunga Camp which was funded by CAMPFIRE and USAID. The benefits I observed extended well beyond the elephants. The large numbers of elephants I observed throughout my hunt were of all ages and in very good condition. Dande East was considered a depleted area for wildlife in 2009 due to rampant poaching by locals and poachers from adjacent Mozambique. At that time, Dande East was only frequented in the early season by crop-raiding elephant bulls from Mozambique. In 2010, my safari operator, Charlton McCallum Safaris, took over Dande East and formed the Dande Anti Poaching Unit (DAPU). To date, the DAPU has removed over 5,000 poaching snares and have arrested over 60 poachers. In just two short years (2010 to 2012), the wildlife rebounded in unbelievable numbers, including elephants, African wild dogs, Cape buffalo, herds of sable and roan antelope, lion, leopard and countless numbers of other wild game and birds – all of which I personally observed during my hunt.

14. In fact, I was the first hunter ever out of the Kurunga Camp to harvest Cape buffalo, sable antelope, lion and leopard. This was something that, at the time, was unheard of and completely unexpected two years prior. The community and the wildlife have responded positively to DAPU. The consistent and coordinated presence of DAPU in the area, combined with the material benefits to the community, have led to this resurgence of wildlife.

15. Without elephant hunting, for which Dande East is a prime area, funding for DAPU would not be possible. The trophy importation ban places this funding in jeopardy. Not only will elephants suffer, but all wildlife will. A major source of funding and conservation incentive to the local communities will be eliminated.

16. To me, it is simple. Without revenue generated by U.S. elephant hunters, consistent and coordinated anti-poaching efforts will suffer. The very elephants that the U.S. Fish and Wildlife Service purports to be concerned about will suffer directly, as will other wildlife. The incentive to protect and conserve elephants and other wildlife will be removed. In Africa, the adage "if it pays, it stays" applies. By way of example, lions had only recently returned to the Dande East Communal Area in 2012 after years of absence following the resurgence of plains game. The lion I harvested was a problem animal that had take dozens of livestock from local villagers prior to my arrival in camp. The only reason the locals had not trapped, shot or poisoned the entire pride, which consisted of nine adults and several cubs, was due to the fact that they knew they would benefit from my hunt. So, the dramatic gains in wildlife conservation achieved in areas like Dande East in only two years will go down the drain. Under the CAMPFIRE program, elephant

populations doubled from 1990 to 2003 on communal lands during the same time that human populations doubled in the same areas. Those gains will also be lost.

17. It has been a lifelong dream of mine to hunt an African elephant on a fair chase basis in the wilds of Africa. I selected Zimbabwe for several reasons – I know the safari operator, observed firsthand the benefits of their anti-poaching efforts, saw the number of elephants that frequented their concessions, and I am familiar with the benefits that elephant hunting has for local communities, including meat and revenues. Operators like Charlton McCallum Safaris provide 50% of elephant trophy fees to the community. The community share is around $228,000.00. I also understand the need to manage elephant herds to avoid habitat degradation and minimize wildlife-human conflict.

18. Zimbabwe is estimated to have upwards of 100,000 elephants but has a carrying capacity of 50,000. Regulated hunting is the only effective way to manage to the elephants in Africa. In other words, I am putting my money where my mouth is. I wanted to see my fees go directly into conservation and anti-poaching programs that benefit elephants and the local people.

19. I intended to hunt elephant in Zimbabwe in the Dande Safari Area from August 16 to 26, 2014. I made final arrangements for the hunt in January 2014. Since that time, I have paid a deposit on the hunt, booked non-refundable airfare and purchased ammunition totaling several thousand dollars. I cancelled the elephant hunt when I learned that I would be unable to import the elephant that I hunted. Being able to bring the elephant home has great significance to me. The loss of that ability removes an important value to my hunt.

20. I not only cancelled my hunt, but also cancelled gunsmith work to my rifle which was to exceed $2,000. I was able to rebook another hunt with my safari operator for other species during the same time frame, but at a much higher cost than the elephant hunt.

21. I submit this declaration in support of Safari Club International's efforts to challenge the U.S. Fish and Wildlife Service's decision to prohibit the importation of sport-hunted elephant trophies from Zimbabwe and Tanzania in 2014.

In accordance with 28 U.S.C. §1746, I declare under penalty of perjury that the foregoing is true and correct.

Dated this 24th day of April, 2014, at Syracuse, New York.

Richard Raymond Capozza

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

SAFARI CLUB INTERNATIONAL	)	
	)	
Plaintiff,	)	Civ. No. 14-cv-00670(ABJ)
	)	
v.	)	
	)	
SALLY M. R. JEWELL, et al.	)	
	)	
Defendants	)	
	)	

DECLARATION OF RICHARD DAVID NETZLEY, JR.

I, Richard David Netzley, Jr., being first duly sworn on oath, depose and state as follows:

1. I work as a veterinarian and live in Boynton Beach, Florida.

2. I have been a member of Safari Club International for about 13 years.

3. I have been hunting for 55 years. I started rabbit hunting with my father on our family farm in Ohio when I was about five years old.

4. I have hunted numerous species in Zimbabwe, Nunavut (Canada), Ontario and in eleven U.S. states.

5. Twice I hunted in Zimbabwe, once in 2001 and once in 2007. Both times, I hunted plains game and other game animals. I have never hunted elephant.

6. On my visits to Zimbabwe, I saw multiple elephants in the areas where government game scouts were present and no evidence of poaching. On private land where no game scouts were present, I saw evidence of poaching of plains game. In the dangerous game areas of Chewore North and Chewore South, the elephant herds were relatively plentiful with many bulls.

7. All hunting safaris on government land in Zimbabwe are accompanied by an armed game scout. The presence of these safaris is, in my opinion, the only thing that deters poachers from Zambia crossing the Zambesi River. A poacher had been killed by a game scout accompanying a safari not long before my safari in 2007. My professional hunter told me in 2007 that my monetary tip to the game scout represented two months' salary for him and that without safaris and the associated tips they bring, the game scouts sometimes are not paid for months. Without this monetary benefit, these scouts have

little incentive to protect the game. In addition, the game meat from animals shot on the safari not only feeds the hunter and safari crew but the game scouts and their families.

8. My hunt supplies hard currency to the Zimbabwe Parks and Wildlife Department. They are the first line of defense against the poaching gangs supplying the demand for illegal ivory. In addition, my safari helps provide the local population with needed protein as well as incentivizes the game scouts. They see the value of what they do and the locals see a greater value to the elephants than what they receive by tolerating the presence of poachers. Without hunters, the unpaid game scouts and the locals will not protect the elephants if they see no value in the elephants that destroy their crops in the fields.

9. I am scheduled for a 14-day hunt in June, 2014 in Zimbabwe. I first placed the deposit for this hunt in February, 2013. I have already paid $18,200 and that does not include the air fare as well as a potential $15,000 in trophy fees.

10. Since the elephant is only one of four species sought on this hunt, I am unable to obtain a refund. I will still hunt elephant and just not bring home the trophy. Although I will be deprived of an important aspect of my experience, I will be doing my best to support the protection of the elephant population in Zimbabwe for the above mentioned reasons.

11. I submit this declaration in support of Safari Club International's efforts to challenge the U.S. Fish and Wildlife Service's decision to prohibit the importation of sport-hunted elephant trophies from Zimbabwe and Tanzania in 2014.

In accordance with 28 U.S.C. §1746, I declare under penalty of perjury that the foregoing is true and correct.

Dated this 23RD day of April, 2014, at BOYNTON BEACH, FLORIDA

RD David Netzley

Richard David Netzley, Jr.

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16 April 2014

Dan Ashe
Director
Fish and Wildlife Service
849 C STREET NW, ROOM
3331 WASHINGTON,
DISTRICT OF COLUMBIA
UNITED STATES OF AMERICA
Via email

Some thoughts about the recent suspension by the United States of America Fish and Wildlife Service of import of Trophy Hunting Elephants from Zimbabwe.

Dear Dr.Ashe,

I would like to share with you some brief thoughts on the recent USFWS decision to ban the import of sport hunting trophies from Zimbabwe.

My knowledge come from several missions undertaken in Southern Africa on Elephant management and more than 25 years experience on CITES and wildlife conservation issues.

It seems unfortunate and a little bit imperative that the letter of USFWS to Zimbabwe and the included notice of import ban was sent, to the best of my knowledge, without a previous alert or warning and that the USFWS based his decision on Zimbabwe on anecdotal evidence when we have for some parts of the country scientific data that demonstrate an increase in Elephant population.

While Zimbabwe is one of the world's best success stories of sustainable wildlife management, it has come with this unintended disadvantage that has been caused by a CITES ban and the recent trend in elephant issues within the Convention.

ZNPWMA is currently sitting on more than US$15 million worth of ivory stockpiles as well as rhino horn, which the country is struggling to get rid especially in light of the severe financial constraints. How many surveys and Management Plans and anti poaching operations and improvements to livelihoods can be done with 15 MILLIONS DOLLARS?

Zimbabwe is also slowly recovering from years of civil unrest. What was one of the most important food exporter in Africa has now severe cases of famine and poverty.

Removal of Elephants trough sport hunting represents a negligible amount of the country population and more importantly represent the most important source of income for many rural population which live in deep poverty.

When discussing elephants in Zimbabwe people tends to forget that in this country 46,000 elephants were removed by culling and hunting between 1960 and 1991 Despite these removals the elephant population doubled within the same period.

in Hwange alone nearly 11,000 elephants were culled to reduce the population from 19000 to 13000 during the 1980's and 1990's. The culling were done in order to protect the vegetation and the habitat. The 2007 aerial survey which is the latest done in Hwange showed around 40,000 presents. Informed estimates report even more than 50,000. The fact that no surveys have been conducted since is neither here nor there. The fact is that there are still too many elephant in Hwange. The killing of around 100 elephants (106) by poison (not 300 as it is claimed) will have no effect what so ever on that population although the method that was used is infamous.

The over 40 000 elephants far exceed Hwange National Park's carrying capacity estimated to be less than 20 000 elephants, a situation which has resulted in more and more elephants straying into neighbouring villages where they destroy crops at a time when the country is struggling to produce enough food to feed itself. Vegetation damage has included a severe loss of trees which, combined with uncontrolled fires, has caused a loss of palatable species of shrubs and grasses. The effect of the elephant over-population on biodiversity has been less easy to monitor. It has been estimated that at densities of < 0.5 elephant per km2, forage and biodiversity may actually be enhanced, while higher densities lead to a loss of biodiversity.

The recommended elephant population for Zimbabwe has been estimated at around 40000 - 50000 animals (0.6 per km2).

Graham Child, former director of National Parks in Zimbabwe and one of the most respected conservationists wrote in 2004: "*Zimbabwe has a population of 100 000 elephant in habitats that can support about half that number. This does not indicate successful conservation, but failure of the conservation authority to preserve natural values. By not fulfilling its mandate the authority is guilty of allowing elephant to prejudice their habitats, those of other animals and the nation's biological diversity. It also encourages local destruction of the country's long-term ecological productivity. Put differently, mismanagement of over abundant elephant is a serious danger to the human environment and to wildlife and its habitats, including healthy elephant populations.* "

I can see a clear parallel with the management decision to open a spring hunting season for Snow Geese in the United States in order to protect Arctic tundra habitat under pressure from the overpopulation of Geese.

As far as I am aware demography and biological considerations are completely absent from USFWS analysis and decisions to suspend the import of trophy hunted elephants from Zimbabwe.

Moreover there are three recent surveys for Zimbabwe. One of 2013 in Gonarezhou estimated a population of 10314 elephants (Dunham, et al, 2013) with an increase of more than 10% on the previous 2009 survey (Dunham et al., 2010) and just the double of the population in the 1980's.

Assuming the ideal density of 0.6 elephants per square kilometre the actual elephant population in Gonarezhou exceed the ideal carrying capacity of the area of 3 times.

The second survey (Selier, J. and Page, B. , 2012) was done in the area between Botswana, Zimbabwe and South Africa where there is a shared population of around 1300 elephants of which around 355 where found on the Zimbabwe side (Nottingham Estate).

The third is the survey of 2010 at Chewore (Kuvawoga, P.T. and Gandiwa, E., 2011) which estimates more than 5000 elephants.

While is true that Hwange was last surveyed in 2007 it is also true that only the three areas showed above are already exceeding the carrying capacity for the whole country.

Although Zimbabwe may not adhere completely in terms of Management Plans and surveys to the expected standards, it has still Community-based natural resources management (CBNRM) programmes in place, and the removal of revenues for these Communities could represent a real social and economic disaster in an already dire social situation.

CBNRM programmes are the crucial factor in combatting poaching and illegal activities because they place a value and ownership sense on wildlife and people tend to conserve what they value. They represent also the best way to alleviate poverty in many rural areas and their improvement and implementation shall be on top of every agenda on wildlife conservation.

I sincerely hope that the United States Authorities continue in their leader role in conservation trough sustainable utilisation and that can reconsider their decision and take a more proactive and collaborative stand with Zimbabwe, one of the many countries in Southern Africa that need help and not punishment.

At the end I should like to quote some remarks by President Obama during his recent visit to Tanzania " *And finally, we discussed an issue that's inseparable from Africa's identity and prosperity -- and that's its wildlife. Tourists from around the world, including the United States, come here -- especially to Tanzania -- to experience its natural beauty and its national parks, and that's obviously an important part of the economy of this country. But poaching and trafficking is threatening Africa's wildlife, so today I issued a new executive order to better organize U.S. government efforts in this fight so that we can cooperate further with the Tanzanian government and others. And this includes additional millions of dollars to help countries across the region build their capacity to meet this challenge, because the entire world has a stake in making sure that we preserve Africa's beauty for future generations." (Underlined, ours)*

The White House Office of the Press Secretary July 01, 2013
Remarks by President Obama and President Kikwete of Tanzania at Joint Press Conference

Legal sport hunting, properly conducted, is one of the most powerful conservation tool in many wild areas of the world. I can imagine that the local communities of Zimbabwe, where

the sustainable use philosophy and practice was born, will be forced to turn to illegal use if no other income, like the one provided by sport hunting, is available to them.

I hope this will not happen.

I remain ant your complete disposal should you need any further clarifications.

Yours Sincerely,

Marco Pani

Vice-President for Europe
IWMC-World Conservation Trust
Wildlife Conservation and Utilization Consultant
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Report No: PAD853

INTERNATIONAL BANK FOR RECONSTRUCTION AND DEVELOPMENT

PROJECT APPRAISAL DOCUMENT

ON A PROPOSED GRANT

FROM THE GLOBAL ENVIRONMENT FACILITY TRUST FUND

IN THE AMOUNT OF US$5.61 MILLION

TO THE

REPUBLIC OF ZIMBABWE

FOR THE

HWANGE-SANYATI HYDROLOGICAL CORRIDOR PROJECT

April 29, 2014

Environment, Natural Resources, Water and
Disaster Risk Management Unit
Sustainable Development Department
Africa Region

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CURRENCY EQUIVALENTS

Currency Unit = US$

FISCAL YEAR
July 1 June 30

ABBREVIATIONS AND ACRONYMS

BP	Bank Procedure
CAMPFIRE	Community Areas Management Programme for Indigenous Resources
CDD	Community-driven development
CITES	Convention on the International Trade in Endangered Species of Wild Fauna and Flora
CIWA	Cooperation in International Waters in Africa
CQS	Selection Based on Consultant's Qualifications
EMA	Environmental Management Agency
EOP	End of project
ESMF	Environmental and Social Management Framework
ESMP	Environmental and Social Management Plan
FAO	Food and Agriculture Organization
FBS	Fixed Budget Selection
FC	Forestry Commission
FM	Financial Management
FOM	Field Operations Manual (of WWF)
GDE	Groundwater-dependent ecosystem
GEF	Global Environment Facility
GEO	Global Environmental Objective
GIS	Geographical Information System
GoZ	Government of Zimbabwe
HNP	Hwange National Park
HSBC	Hwange-Sanyati Biological Corridor
HSBCP	Hwange-Sanyati Biological Corridor Project
HWC	Human-wildlife conflict
IAS	Invasive and alien species
IBRD	International Bank for Reconstruction and Development
IC	Individual Consultant
ICB	International Competitive Bidding
IDA	International Development Association
IMF	International Monetary Fund
IPDP	Indigenous Peoples Development Plan
IPPF	Indigenous Peoples Planning Framework
ISN	Interim Strategy Note

KAZA TFCA	Kavango-Zambezi Transfrontier Conservation Area
LCS	Least Cost Selection
M&E	Monitoring and Evaluation
MDTF	Multi-donor trust fund
METT	Management Effectiveness Tracking Tool
MoEWC	Ministry of Environment, Water and Climate
MoFED	Ministry of Finance and Economic Development
MTR	Mid-term Review
NCB	National Competitive Bidding
NGO	Non-governmental organization
OP	Operational Policy
ORAF	Operational Risk Assessment Framework
PA	Protected Area
PAD	Project Appraisal Document
PDO	Project Development Objective
PF	Process Framework
PIM	Project Implementation Manual
PPG	Project Preparation Grant
PWMA	Parks and Wildlife Management Authority
QA/QC	Quality Assurance/Quality Control
QBS	Quality-Based Selection
QCBS	Quality- and Cost-Based Selection
RDC	Rural Downer Council
REDD+	Reduced Emissions from Deforestation and Forest Degradation
SADC	Southern African Development Community
SFM	Sustainable Forestry Management
SSS	Single Source Selection
TA	Technical Assistance
TDA	Transboundary Diagnostic Analysis [of aquifers]
UNDP	United Nations Development Programme
UNFCCC	United Nations Framework Convention on Climate Change
UNOPS	United Nations Office for Project Services
WWF	World Wide Fund for Nature
ZAIP	Zimbabwe Agricultural Investment Plan
ZAMCOM	Zambezi Watercourse Commission
ZINWA	Zimbabwe National Water Authority

Regional Vice President:	Makhtar Diop
Country Director:	Kundhavi Kadiresan
Sector Director:	Jamal Saghir
Sector Manager:	Jonathan Kamkwamala
Task Team Leader:	Douglas J. Graham

REPUBLIC OF ZIMBABWE
HWANGE-SANYATI BIOLOGICAL CORRIDOR PROJECT

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PAD DATA SHEET

Zimbabwe

Hwange-Savuati Biological Corridor Project (P124625)

PROJECT APPRAISAL DOCUMENT

AFRICA
AFTN2

Report No: PAD955

Basic Information

Project ID	EA Category	Team Leader
P124625	B - Partial Assessment	Douglas J Graham
Lending Instrument	Fragile and/or Capacity Constraints [ ]	
Investment Project Financing	Financial Intermediaries [ ]	
	Series of Projects [ ]	
Project Implementation Start Date	Project Implementation End Date	
16-May-2014	30-Jun-2019	
Expected Effectiveness Date	Expected Closing Date	
01-Jul-2014	30-Jun-2019	
Joint IDA		IDA Local Area
No		Multi-local area

Sector Manager	Sector Director	Country Director	Regional Vice President
Jonathan S Kamkwalala	Jamal Saghir	Kundhavi Kadiresan	Makhtar Diop

Borrower: Government of Zimbabwe

Responsible Agency: World Wide Fund for Nature

Contact	Dr. Enos Shumba	Title	Interim Country Director
Telephone No:	2634252533	Email:	eshumba@wwfzim.org.zw

Project Financing Data(in USD Millions)

[ ] Loan [X] Grant [ ] Guarantee

[ ] Credit [ ] IDA Grant [ ] Other

Total Project Cost	29.81	Total Bank Financing	0.00
Financing Gap	0.00		

Financing Source	Amount

Borrower	13.22
Global Environment Facility (GEF)	5.64
Cooperation in International Waters in Africa	4.00
Tan Africa Leveraging Fund	0.25
World Wildlife Fund	1.50
Foreign Multilateral Institutions (unidentified)	0.55
Non-Governmental Organizations (Within the Borrowing Country)	0.20
Foreign Private Commercial Sources (unidentified)	3.45
Total:	28.81

Expected Disbursements (in USD Million)

Fiscal Year	2015	2016	2017	2018	2019	(2020)	(2021)	(2022)	(FY23)
Annual	0.40	1.50	1.50	1.50	0.75	(0.15)	(0.10)	(0.10)	(0.10)
Cumulative	0.40	1.90	3.40	4.90	5.65	(0.15)	(0.10)	(0.10)	(0.10)

Proposed Global Environmental Objective(s)

To develop land use and resource management capacity of managers and communities in the Hwange Sawyer Biological Corridor (HSBC).

Components

Component Name	Cost (USD Millions)
Protected area management and community livelihoods	1.50
Improved Land and forest management	3.24
Corridor sustainability	0.33
Project coordination	0.25

Institutional Data

Sector Board

Environment

Sectors / Climate Change

Sector (Maximum 5 and total % must equal 100)

Major Sector	Sector	%	Adaptation Co-benefits %	Mitigation Co-benefits %
Agriculture, fishing, and forestry	Forestry	45	20	10
Public Administration, Law, and Justice	General public administration sector	20		

Public Administration Law and Justice	Sub-national government administration	20
Public Administration Law and Justice	General government administration	15
Total		100

__ I certify that there is no Adaptation and Mitigation Climate Change Co-benefits information applicable to this project.

Themes

Theme (Maximum 5 and total % must equal 100)

Major Theme	Theme	%
Environment and natural resources management	Biodiversity	10
Environment and natural resources management	Land administration and management	25
Environment and natural resources management	Climate change	20
Environment and natural resources management	Environmental policies and institutions	15
Environment and natural resources management	Other environment and natural resources management	10
Total		100

Compliance

Policy

Does the project depart from the CAS in content or in other significant respects?	Yes [ ]	No [X]
Does the project require any waivers of Bank policies?	Yes [ ]	No [X]
Have these been approved by Bank management?	Yes [ ]	No [ ]
Is approval for any policy waiver sought from the Board?	Yes [ ]	No [X]
Does the project meet the Regional criteria for readiness for implementation?	Yes [X]	No [ ]

Safeguard Policies Triggered by the Project	Yes	No
Environmental Assessment OP/BP 4.01	X	
Natural Habitats OP/BP 4.04	X	
Forests OP/BP 4.36	X	
Pest Management OP 4.09		X
Physical Cultural Resources OP/BP 4.11	X	
Indigenous Peoples OP/BP 4.10	X	

Involuntary Resettlement OP BP 4.12	X	
Safety of Dams OP BP 4.37		X
Projects on International Waterways OP BP 7.50		X
Projects in Disputed Areas OP BP 7.60		X

Legal Covenants

Name	Recurrent	Due Date	Frequency
Compliance with Safeguards Instruments	X		CONTINUOUS

Description of Covenant

The Recipient and the Project Implementing Entity shall ensure that the Project is carried out in accordance with the relevant Safeguards Instruments.

Conditions

Source Of Fund	Name	Type
	Execution of the Agreements	Effectiveness

Description of Condition

The execution and delivery of the Grant Agreement on behalf of the Recipient and of the Project Agreement on behalf of the Project Implementing Entity have been duly authorized or ratified by all necessary governmental and corporate action.

Source Of Fund	Name	Type
	Execution of the Subsidiary Agreement	Effectiveness

Description of Condition

The Subsidiary Agreement has been executed on behalf of the Recipient and the Project Implementing Entity.

Source Of Fund	Name	Type
	Approval of Project Implementation Manual	Effectiveness

Description of Condition

The Project Implementation Manual has been approved by the Recipient and the World Bank and adopted by the Project Implementing Entity.

Team Composition

Bank staff

Name	Title	Specialization	Unit
Douglas J. Graham	Senior Environmental Specialist	Senior Environmental Specialist and Team Leader	AFTN2
Zoe Kolovou	Lead Counsel	Lead Counsel	LEGAM
Wesley Ilunga	Senior Procurement Specialist	Senior Procurement Specialist	AFTPT

Samuel Taffesse	Senior Operations Officer	Senior Operations Officer and Senior Team Leader	AFTEW
Robert Mearns	Senior Leader	Senior Leader	AFTSN
Kristine Schwetzer	Social Development Specialist	Social Development Specialist	AFTCS
Arnaldo Kenzo	Consultant	Environmental Safeguards Consultant	AFTN1
Blessing Manyanda	Disbursement Asst	Disbursement Asst	AFMZW
Janet Chido Bvumbe	Program Assistant	Program Assistant	AFMZW
Omar Lyasse	Senior Agriculture Economist	Senior Agriculture Economist	AFTAU
Daniel Yaw Domeher	Senior Financial Specialist	Financial Management	AFTMI
Nadege Martin	Temporary	Temporary	AFTN2
Non Bank Staff			
Name	**Title**	**Office Phone**	**City**
Enos Shumba	Interim Director, WWF-Zimbabwe		Harare
Godwin Muhuriwa	Finance Manager WWF-Zimbabwe		Harare
Lilian Gomdema	Regional Operations Manager, WWF-Zimbabwe		Harare
Milward Kusena	Projects Officer, WWF-Zimbabwe		Harare
Candace Bate	Communications Officer, WWF-Zimbabwe		Harare
Semukai Nyathi	Senior Ecologist, PWMA		Harare
Barnaneli Nyagure	Senior Ecologist, PWMA		Harare
Alfred Nyabure	Env. Planning & Monitoring Manager, EMA		Harare
Debra Mapeyaki	EIA & Ecosystem Protection Manager, EMA		Harare
Love Magumo	Env. Planning & Monitoring Officer EMA		Harare

Member Mushonga Isaac	Research Coordinator, FI	Harare
Joseph Machirebvu	Mapping & Inventory Officer, FI	Harare
Charles Jenya	Director, CAMPFIRE Association	Harare
Webster Muti	Safeguards Consultant	Harare
Irene Kurasa	Director for Environment, MoI Wt	Harare
Edward Samarasa	Director for Natural Resources, MoI Wt	Harare
David Bernardeau	Environmental Consultant	Harare

Location

Country	First Administrative Division	Location	Planned	Actual	Comments
Zimbabwe	Midlands	Midlands Province		X	
Zimbabwe	Matabeleland North	Matabeleland North Province		X	
Zimbabwe	Matabeleland West Province	Matabeleland West Province		X	

I STRATEGIC CONTENT

A. Country Context

1 During the past four years, Zimbabwe has seen relative political stability, the adoption of a multi-currency regime, and economic reforms have generated economic growth. Nonetheless, the preceding decade of economic decline, induced by recurrent cycles of political and economic crises, has severely compromised basic service delivery, public sector capacity, infrastructure maintenance, and the investment climate for the private sector.

2 Following a modest 4.5 percent in 2012, growth decelerated in 2013, to 3.0 percent[1]. Tapering off economic growth has resulted from continued slackening of the key sectors of the economy, amidst declining international commodity prices, weak investor confidence, and vulnerabilities in the banking sector. Growth is expected to pickup to 4.2 percent in 2014, supported by a rebound in agriculture, after a poor 2013 season, when the agriculture sector contracted overall by 1.5 percent. An International Monetary Fund (IMF) Staff Monitored Program has been under implementation since June 2015, offering the opportunity for Zimbabwe to establish a track record on macroeconomic management.

3 Food insecurity has been reduced since the peak of the crisis in 2008-09, but it still remains at an unacceptable level. Indeed, the persistent vulnerability of the agricultural sector to shocks has been evident in the past two agricultural seasons, as late onset of rains, prolonged drought, and the reduction or late arrival of subsidized or free inputs led to the write-off of about 45 percent of the potential maize harvest in 2011-2012. A similar pattern was emerging for the 2012-13 agricultural season, with current estimates predicting a 3.5 percent decline in overall agricultural growth. Food insecurity increased by over sixty percent during the 2012-13 season, mainly as a result of drought. Vulnerability increased as a result, as the assets of poor households were eroded.

4 The recent 2011-2012 poverty report[2] reveals that 72.3 percent of Zimbabweans are poor, with poverty being most prevalent in rural areas, where 84.3 percent of people and 62.6 percent of households are deemed poor, whilst 16.2 percent of households are in extreme poverty. The health, education, and agriculture sectors are constrained by declining public financing, the introduction of informal fees and levies, an acute shortage of adequately trained personnel, dilapidated infrastructure, and obsolete equipment.

5 The country experienced relative political stability over the last four years since the establishment of an "Inclusive Government" in 2009, made up of the three major political parties – creating significant reforms and implementing programs to turn around the economy. Peaceful elections were held in July 2013 and subsequently a

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[1] Short Term Risk Monitoring Group. 2014. *January 2014 STRMG Report*.

[2] Zimbabwe National Statistics Agency (ZimStat). 2013. *Poverty and Poverty Datum Line Analysis in Zimbabwe 2011-12*.

new government was sworn in September. The Government crafted a new economic blueprint known as the "*Zimbabwe Agenda for Sustainable Socio Economic Transformation (Vision 2030)*".[1]

6. The Government of Zimbabwe (GoZ) has been in arrears to the World Bank since October 2000. The prospects and likely timelines for clearing arrears to the International Financial Institutions remain uncertain at this time. Without the clearance of arrears to International Financial Institutions, Zimbabwe cannot access regular development assistance from these institutions. However, as per OP 10.20, GEF funding can be provided to countries in arrears, if the Bank determines that the objectives of the project can nevertheless be achieved. In view of capacity constraints, the GoZ has requested that the funds would be ear-granted to the World Wide Fund for Nature-Zimbabwe (WWF-Zimbabwe), to execute this GEF-funded project on its behalf but in close partnership with the relevant Government institutions.

B. Sectoral and Institutional Context

7. Zimbabwe faces a number of daunting environmental challenges including deforestation and forest degradation; land, air, and water pollution; soil erosion; land degradation, loss of biodiversity, and contamination and pollution from poor mining practices. The political and economic upheaval the country has gone through since 2000 has diverted attention from management of the challenges facing the country's natural resources. Factors contributing to environmental deterioration include population growth, poverty, agricultural expansion, and continued reliance on wood fuel. The global rise in the demand for oil and minerals has increased prospecting and mine development around high biodiversity areas in some regions of the country.

8. Forestland constitutes 40.4 percent of total land area. Designated parks and forest reserves cover about 5 million hectares. These areas are the habitat for a rich native fauna, representing a major attraction to the tourism subsector. Timber and non-timber forest products are a good source of livelihoods for the rural population living in close proximity to these areas. Forests contribute about 7 percent of the GDP in Zimbabwe and are an important source of employment.

9. Forest and land degradation are particularly worrisome throughout the country. Unsustainable firewood collection is contributing to widespread deforestation, land degradation, and loss of biodiversity. The country lost about 20 percent of its forest cover between 1990 and 2010, an average loss of 327,000 hectares per year, with tobacco curing being a major contributor, making it one of the world's top ten countries based on the largest annual net loss of forest area.[2] Land degradation results from human land use changes and unsustainable land use practices, particularly in the heavily utilized communal areas. Inappropriate land use and non-compliance with

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[1] Government of Zimbabwe. 2013. *Zimbabwe Agenda for Sustainable Socio-Economic Transformation (Vision 2030): Towards an Empowered Society and a Growing Economy*. October 2013 – December 2018. This publication is available at http://www.herald.co.zw/wp-content/uploads/2014/01/Zim-Asset.pdf

[2] Food and Agriculture Organization (FAO). 2010. *Global Forest Resources Assessment 2010*. Report available at http://www.fao.org/docrep/013/i1757e/i1757e.pdf

natural resource conservation measures and legislation have worsened the situation. Land degradation can have significant economic impacts by reducing agricultural productivity and from gullying. Sustainability of agriculture and food security will be further compromised by loss of biodiversity.

10. The government is reviewing legislation and regulations to compel farmers to plant trees for every hectare of tobacco but the monitoring and enforcement systems remain exceedingly weak. There is also increasing interest in conservation agriculture, including conservation farming, as a way to minimize the adverse effects of utilization of the natural resources.

11. Global Climate Models (GCMs) indicate that most of southern Africa, including Zimbabwe, is likely to experience higher temperatures in coming decades but the picture for rainfall is less clear. The International Panel for Climate Change (IPCC) Fourth Assessment Report suggests that by 2050 Zimbabwe's temperatures will be 2 to 4°C higher than the 1961-1990 baseline, while rainfall will be 10 to 20 percent less[7]. Other model simulations show annual rainfall declining by 2080 by 5 to 20 percent from the 1961-90 average in all of the country's major river basins, with possible decreases in rainfall especially during the period of the rainy season onset (September to November)[8]. While average annual rainfall appears to have changed little over the last 50 years, droughts and floods have become more frequent and severe and the onset of the rains less dependable.

12. The World Bank is finalizing an important study on *Climate Change and Water Resources Planning, Development and Management in Zimbabwe*. Climate change will result in significant impacts in Zimbabwe, and key aspects are being incorporated in the Water Sector Investment Analysis (WSIA). The study uses global climate models to determine likely changes in precipitation and analyses the consequences. The study indicates that the impact is likely to be a reduction in average precipitation in all catchments except Mazowe and Manyame. The drier catchments of Runde and Mzingwane will be affected most, with declines in mean annual precipitation of between 12 percent and 16 percent by 2050, consistent with the IPCC estimates. Groundwater recharge will follow a similar pattern of reduction. An important aspect of the analysis is to indicate that surface runoff will be affected to an even greater extent than the decline in rainfall: for example, in Sanyati a 3-7 percent decline in rainfall gives a 10-23 percent decline in Mean Annual Runoff (MAR). In addition, there is likely to be greater variability in rainfall and greater frequency of extreme events (droughts and floods).

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[7] Boko, et al., 2007: "Africa" in IPCC, 2007: *Impacts, Adaptation and Vulnerability. Contribution of Working Group II to the Fourth Assessment Report of the Intergovernmental Panel on Climate Change*, Cambridge University Press, p. 433-467. The 2014 Fifth Assessment Report released in March 2014 did not significantly change these broad conclusions but note that the estimates differ significantly between the different scenarios used by the Panel.

[8] Government of Zimbabwe / UNDP (ed.), 2011: *Coping with Drought and Climate Change in Zimbabwe*. Project Paper.

13 Increases in temperature, more frequent extreme weather events, and greater rainfall variability are expected to increase the occurrence of crop failures, pests, crop disease, and the degradation of both land and water resources, all of which will adversely affect Zimbabwe's natural resources base. Land degradation, exacerbated by climate variability and change, manifests itself through soil erosion, water scarcity, and loss of vegetation, and will also affect agriculture productivity. As per Zimbabwe's Second Communication to the United Nations Framework Convention on Climate Change (UNFCCC), under the worst-case scenario, by 2080 Zimbabwe's plant diversity is projected to decline throughout the country, under dryer conditions, with concomitant shrinking of high biodiversity areas.

14 Groundwater provides water to more than 70% of Zimbabwe's population; the country is one of SADC's most groundwater dependent countries (along with Botswana and Namibia). The maintenance of large elephant populations in HNP depends on groundwater extraction (see Annex 8). The rural population that is dependent on groundwater, particularly those in the drier west and southern parts of the country, will be most adversely affected by climate change. It is the principal source of water for both the constantial and commercial sectors in rural areas and a major source of water for irrigation, mining, and tourism. Yet its planning, development, and management has received little systematic attention since the mid-1980s because the country concentrated on the provision of clean water from surface water resources. There is almost no monitoring of groundwater levels (except near mining activities and in some urban areas) and little investigation of groundwater resources. The Government of Zimbabwe (GoZ) introduced a new Water Act in 1998, along with the ZINWA Act to establish a specialized water management agency (the Zimbabwe National Water Authority, ZINWA). The Government has recently endorsed a new National Water Policy (NWP), and is currently preparing a Water Quality and Source Protection Strategy. With assistance from the World Bank, it is also finalizing a Water Sector Investment Analysis (WSIA), and engaged in a number of transboundary water initiatives. See further information on groundwater below under Lessons learned.

15. Aquifers provide a natural buffer against the variability of weather conditions and climatic events, responding much slower than surface waters to meteorological variability. During droughts, groundwater can therefore sustain the availability of water during critical times, such as the end of the dry season. Sustainable use of groundwater is a challenge because there is a dearth of data and scientific information on hydrogeological characteristics (i.e., availability, quality, productivity, etc.). The infrastructure used to abstract groundwater may also not be maintained or adapted to local conditions. Monitoring of groundwater in Zimbabwe is mostly done at point sources such as boreholes, wells, and trenches. There is, however, lack of monitoring that allows for a more regional or basin perspective.

16 One of the main responses to climate change will likely be greater reliance on groundwater. The management of groundwater, and particularly the conjunctive

Ministry of Environment, Water and Climate (MoEWC). 2013. Zimbabwe National Climate Change Response Strategy. Available at http://www.preventionweb.net/files/33916_zimbabwenationalclimatechangestrat.pdf

management of surface and groundwater, is widely regarded as a vital strategy to ameliorate the effects of climate change and rainfall variability. However, certain groundwater resources may themselves be at risk from drought. Indeed, the crystalline aquifers in the Southern African Development Community (SADC) region in general, and in Zimbabwe in particular, are highly vulnerable to drought and to climate change. The drought risks for Zimbabwe are further exacerbated by the concentration of human populations in risk prone areas[9]

17 The Hwange-Sanyati Biological Corridor (HSBC) covers the bulk of northwest Zimbabwe (see map at the end of this report), providing livelihoods for livestock farmers, forest-dependent populations, and communities engaged in wildlife-based enterprises. The future of the HSBC is shadowed by all of the environmental and natural resource management issues that are problematic at the national scale. Additionally however, there are a number of challenges specific to this broad swathe of the national territory.

18 Although most of the area of the HSBC is too dry for crop production, households on the communal lands in these regions grow grain crops (maize and millet) for their food security and some cash crops such as cotton. Crop yields are low and the risk of crop failure is high in one out of three years[10]. Cattle and goat production are major sources of cash income.

19 Rangelands occupy a significant portion of the HSBC and climate change effects are expected to be pronounced in these areas with more frequent and extreme droughts, affecting available water and forage for wildlife populations, livestock, and crop yields. Human-wildlife conflict (HWC), already exacting its toll on community livelihoods through destruction of gardens and crops and killing of livestock, will be exacerbated as wildlife travels further outside Hwange National Park (HNP) in search of both surface grazing grounds and accessible water sources, negatively impacting an already food insecure population (estimated at between 20 to 40 percent in the HSBC area[11]).

20 The recently concluded World Bank Livestock Sector Analysis indicated that rangeland net primary production (NPP) will decrease from the current average maximum of 8 tonnes/ha/year to just over 5 tonnes/ha/year resulting in lower rangeland carrying capacity for livestock and wildlife. The south-west and north-western parts of the country will experience greater reduction in NPP than in other parts of the country[12].

21 Due to the generally poor and infertile sodic soils of the HSBC and relatively low vegetative density, coupled with the semi-arid climate and improper land use practices (including stream bank cultivation, veld fires, and land clearance for cultivation), soils

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[9] World Bank. 2010. *Zimbabwe Water Sector Investment Analysis – Summary Report*.

[10] Rukuni M and C. K. Eicher. 1994. *Zimbabwe's Agricultural Revolution*. University of Zimbabwe, Harare.

[11] FAO/WFP. 2010. FAO/World Food Programme Crop and Food Security Assessment Mission to Zimbabwe. Available at website of Economic and Social Development Department.
http://www.fao.org/docrep/012/ak152e/ak152e00.htm

[12] World Bank. 2011. *Zimbabwe Livestock Sector Analysis*.

in the HSBC area are being chemically and physically weathered resulting in extensive erosion and severe gullying in some areas.

22. With limited resources, various branches of the GoZ are attempting to tackle management challenges of the HSBC. A variety of other actors are tackling some of the main natural resource management issues within the HSBC. The Food and Agriculture Organization (FAO) has supported a human and wildlife conflict mitigation project in Hwange District. The French Agricultural Research Centre for International Development (CIRAD) is undertaking research in HNP. Wilderness Wildlife Trust in Hwange is supporting an anti-poaching and game water supplies initiative. In Nyaminyami District, the Convention on the International Trade in Endangered Species of Wild Fauna and Flora (CITES) has a project monitoring illegal killing of elephants.

23. With support from the World Bank and other development partners, the GoZ has recently signed off on the Comprehensive Africa Agriculture Development Programme (CAADP) compact and its associated Zimbabwe Agricultural Investment Plan (ZAIP) as the framework to guide future agricultural development investments. From a NRM perspective, this has been an important milestone as these CAADP documents emphasize that a sustainable increase in agriculture production and productivity hinges upon improved management and sustainable use of the natural resources base. The ZAIP indicates that the productive potential of the natural resource base can be enhanced by targeted investments in irrigation, forestry, secure tenure and land rights, and sustainable land management (SLM) practices, which is particularly evident under the first Intermediate Result Area in the ZAIP: "Increasing production and productivity through improved management and sustainable use of land, water, forestry and wildlife resources". The ZAIP emphasizes the importance of sustainable forestry and wildlife management and the role that conservation farming should play.

24. The Government of Zimbabwe recently completed a GEF-funded project, implemented through the United Nations Development Programme (UNDP), "Coping with Drought and Climate Change Project". It sought to demonstrate and promote adoption of a range of gender-targeted approaches for adaptation to climate change among rural communities engaged in agriculture in vulnerable areas of Chivedzi District, as a national model. The GEF Small Grants Program is supporting various activities on protection of biodiversity and its sustainable use for enhancement of livelihoods in Zimbabwe (e.g. protection of forest ecosystems through afforestation and promotion of agroforestry and ecological restoration of degraded pasture and farm land). Participatory management approaches such as the Communal Areas Management Programme for Indigenous Resources (CAMPFIRE) have been adopted in the past, albeit with limited success in some cases.

25. These diverse investments in the HSBC lack a coherent strategic focus and there is an urgent need for a greater range of management tools and capacity building in their use and in implementing a more comprehensive and sustainable vision of natural resources management.

26. The institutional map of actors responsible for natural resources management in the HSIC is complex. The Ministry of Environment, Water and Climate (MoEWC) is responsible for policy formulation, strategy development and executing programs in the environment sector of Zimbabwe as a whole. The Environmental Management Agency (EMA) is responsible for ensuring the sustainable management of natural resources and protection of the environment, the prevention of pollution and degradation. The Parks and Wildlife Management Authority (PWMA) manages wildlife conservation and sustainable use specifically in protected areas around the country. The Forestry Commission (FC) contributes to natural ecosystems development through effective regulation and capacity enhancement in the sustainable utilization and management of forest resources. EMA, PWMA, and the FC all fall under the authority of the MoEWC (for more information, see Section IV) and all will be involved in the implementation of this project.

C. Higher Level Objectives to which the Project Contributes

27. As noted above in the Country Context, the Government of Zimbabwe has recently formulated "Zim Asset", a five-year development plan for the country. The implementation of the Plan will be carried out through four clusters, among which, is the "Food security and nutrition cluster". The key result areas of this Cluster are among others, environmental management of natural resources and protection and conservation of biodiversity.

28. The Interim Strategy Note (ISN) (2013-2015), endorsed by the World Bank's Board in April 2013, put forward three priority areas: fostering an enabling environment for reducing vulnerabilities, improving resilience, and strengthening human development. The ISN proposes "a broad based pro-poor growth strategy with support for social protection and other mechanisms to provide safety nets for the poor and vulnerable and for improving the availability, cost, and utilization of basic services for the poor." The HSIC Project is in alignment with the ISN under the third objective of reducing vulnerabilities, improving resilience, and strengthening human development.

29. Zimbabwe was making rapid strides towards the achievement of Goal 7 of the Millennium Development Goals, Ensuring Environmental Sustainability, before the onset of the economic crisis but is now off-track to meet this goal. The HSIC project, at least for northwestern Zimbabwe, will be a step toward regaining ground that has been lost in the last decade.

30. The project will furthermore contribute to addressing the following higher level challenges:

a) Reducing biodiversity loss and improving community livelihoods by improving the capacity of the Parks and Wildlife Management Authority to better manage Hwange National Park and assist its buffer communities to economically and substantially benefit from natural resources.

b) Halting reducing land degradation by training the Environmental Management Agency to develop and pilot sustainable land management tools;

c) Reducing forest degradation and enhancing carbon sequestration by supporting the Forestry Commission in implementing improved forest management practices in selected gazetted forests; and

d) Given that the project area falls within the Kavango-Zambezi Transfrontier Conservation Area (KAZA TFCA), the project will contribute to the country's regional integration agenda as articulated in the Southern African Development Community (SADC) Treaty (see Annex 8 for further information on KAZA TFCA).

31. The project uses an integrated landscape/ecosystems approach in the specific geographic area of the HSBC within Zambezi and thus, will be developed as a multi-focal area project combining several GEF strategic focal area objectives. The project is a cross-cutting proposal that is consistent with the GEF Biodiversity (Objectives 1), Climate Change (Objective 5), Land Degradation (Objective 3) and Sustainable Forest Management/REDD+ (Reduced emissions from deforestation and forest degradation) (Objective 1). Linkages are detailed in the incremental costs analyses (Annex 7).

II PROJECT DEVELOPMENT OBJECTIVE(S)/GLOBAL ENVIRONMENT OBJECTIVE(S)

A. PDO/GEO

32. The combined Project Development Objective/Global Environment Objective (PDO/GEO) is "to develop land use and resource management capacity of managers and communities in the Hwange-Sanyati Biological Corridor (HSBC)".

Project Beneficiaries

33. In the vicinity of HNP, many communities benefit from activities associated with the park and its buffer zones: crafts, concessions, access to wildlife in buffer zones for bushmeat, employment in lodges, and self-employment in tourism-related activities. Many of these surrounding communities will benefit from better management of HNP and the resulting increase in tourism and wildlife (see further data on tourism in HNP in Annex 2). An estimated 10,600 persons are considered to be direct project beneficiaries of the investments in HNP.

34. An estimated 5,000 persons will be direct beneficiaries from the alternative livelihood activities that will shift communities away from unsustainable resource harvesting. Another estimated 4,000 people will benefit from improved forest management in the two forest reserves targeted under the project.

35. The improved management of HNP and the forest reserves will not only benefit tourists and local communities but will directly benefit wildlife populations within the HSBC. The project will in particular directly benefit HNP's elephants, one of the largest herds

of this keystone species in Africa, by ensuring sustainable water sources, reducing poaching, and facilitating their movement across the HNPC corridor in search of forage. Other than elephants, many other species that depend on the same natural habitat and water sources in the park will similarly benefit.

36 Finally, an estimated 1,000 people will directly benefit from the land degradation investments namely through better gully management and soil conservation and management. A much larger number of persons, not considered quantifiable will be indirect beneficiaries from the protection of threatened infrastructure and from putting in place longer-term land management models.

37 The combined number of beneficiaries of HNP management, livelihood investments, forest management, and land degradation investments is thus 20,000, which will be measured as a core indicator under the project. Project beneficiaries will include women and youth. To ensure that gender and youth issues are mainstreamed into the management of the buffer zone, the project will target women and youth as direct beneficiaries from alternative livelihood activities supported by the project. Gender-specific benefits will be monitored, the monitoring indicator for the total number of beneficiaries includes a disaggregated value for women, a target of 50% by the end of the project.

PDO Level Results Indicators

38 Progress towards achieving the PDO will be measured using the following indicators and end of project (EOP) targets:

a) An improvement in protected area (PA) management effectiveness as measured by the standardized GEF tracking tool, the Management Effectiveness Tracking Tool (METT), from 51 to 65. An intermediate value of 59 is expected by the mid-term review (MTR).

b) The amount of carbon sequestered in the project forest reserves remains stable over the lifetime of the project, with no net loss of carbon, thus reversing the baseline trend of a continuing loss of carbon.

c) The number of hectares where the project introduces successful management and or remediation of sodic soil areas currently subject to major gullying problems; the target is 500 ha.

d) A total of 20,000 direct project beneficiaries (of which 50 percent female) (this is a World Bank core indicator with a standardized methodology).

III. PROJECT DESCRIPTION

A. Project Components

39. The project will have four components (see Annex 2 for more detailed description of investments under each component and subcomponent):

40. **Component 1: PA management and community livelihoods** (US$10.025 million of which US$1.795 million is GEF financing and US$8.23 million is parallel financing). The aim of this component is to improve management of Hwange National Park and the livelihood of communities involved in stewardship of the natural resources in its buffer zone. The component will focus primarily on Hwange and Tsholotsho Districts, the only districts in the HSBC that share boundaries with HNP.

41. *Subcomponent 1.1: Improved management of Hwange National Park.* This subcomponent would finance investments for improving park management, improving water and game water supply management, and supporting essential research and monitoring. Investments would include consultants, studies, operational costs, equipment, and vehicles.

42. *Subcomponent 1.2: Improved community livelihoods through wildlife management.* This subcomponent would support investments in the buffer areas of HNP through the restocking of wildlife areas; mitigating human and wildlife conflict (HWC); provision of appropriate training to rural district councils (RDCs), environment sub-committees and communities; and conducting research on HWC mitigation. It will support the CAMPFIRE system that will open new opportunities to communities to allow them to better manage their natural resources (largely through trophy hunting quotas that create employment for local populations as well as revenue for infrastructure projects).

43. **Component 2: Improved forest and land management** (US$9.54 million of which US$3.24 million is GEF financing and US$6.3 million is parallel financing). The aim of this component is to improve forest and land management across the HSBC by developing tools to address land degradation, land use change, and deforestation and by implementing pilot activities.

44. *Subcomponent 2.1: Improved forestry management.* Five of the country's 24 gazetted indigenous forest areas are found within the project area: Sikumi, Ngamo, Mzola, Kavira and Sijarira. The project will focus specifically on the Sikumi and Ngamo Forest Reserves (see map in Annex 9) that are adjacent to the HNP and consequently provide continuity for wildlife movement within the corridor. The subcomponent will support better forestry and wildlife management; build national capacity on REDD+ as a tool for avoiding deforestation; and produce a compendium on invasive and alien species (IAS).

45. *Subcomponent 2.2: Land Rehabilitation.* The root causes of land degradation, which include both natural and man-made factors, include extensive change in land use, deforestation, intensive farming of riverbanks and hillsides, and soil composition and structure. The project area straddles the Gwayi (87,960 km²) and Sanyati (74,534 km²)

catchments. These catchments receive 450 to 650 mm of rainfall per annum. Most of the catchments' inhabitants depend on agriculture for survival, growing crops such as maize, small grain cereals, and cotton under rain fed conditions and tend cattle and goats. The Umc sub-catchment, which includes Chireya Ward and is characterized by sodic soils, is one of the most degraded landscapes in the corridor. In order to support land rehabilitation in the sub-catchment, the project will develop a sustainable land use decision support tool that focuses on sodic soils; pilot the tool with communities in the Umc sub catchment; provide training on the use of the tool, particularly for the Environment Sub-Committees; support coordinated land use planning; and produce best practice guidelines on the management of sodic soils and provide for their use in areas with similar soils and management challenges.

46 **Component 3: Corridor Sustainability** (US$9.37 million of which US$0.335 million is GEF financing and US$8.035 million is parallel financing). Under this component, project actors led by MoEWC will work together to ensure close coordination and synergy between the different components and project activities, to promote better development planning and coordination at the wider landscape level of the HSBC, and to facilitate corridor-level scaling-up of land management and biodiversity conservation tools and initiatives. Specific activities to be undertaken under this component include:

a) Mapping of land use patterns within the biological corridor and technical support to the units within the ministries to develop a strategy for landscape-based approaches for good management of forests and wider landscape in the HSBC.

b) Review and systematically package relevant tools developed in the different project components for wider dissemination and up-scaling to corridor level.

c) Support to develop and implement a communication strategy on the integrated approach for the HSBC that encompasses branding of the corridor.

d) Further solidify the links with KAZA TFCA in support of the transboundary nature of the HSBC, bolster coordination with KAZA TFCA partners through regular meetings with practitioners and sharing practical experiences on transboundary conservation issues.

e) Build national and regional institutional capacity in climate change and natural resource use analyses, capacity building, and awareness creation.

47. **Component 4: Project Coordination** (US$0.875 million of which US$0.275 million is GEF financing and US$0.6 million is parallel financing). This component will provide funding to manage and provide oversight of the project, including financial management and audits, procurement, and monitoring and evaluation (M&E).

B. Project Financing

48 The project will be a five-year operation, financed with grant resources from the GEF trust fund totaling US$5.645 million. Parallel financing is estimated at US$23.165

million for a project total of US$28.81 million. Parallel financing contributions include both grant financing and in-kind financing.

49. The overall project cost by component, disaggregated by funding source, is provided in the following table. See also the Incremental Costs Annex (Annex 7) for a more detailed breakdown of counterpart and GEF financing by component.

Project Components	Project cost	GEF Financing	Parallel Financing	% GEF Financing
[illegible]	[illegible]	[illegible]	[illegible]	[illegible]
[illegible]	[illegible]	[illegible]	[illegible]	[illegible]
[illegible]	[illegible]	[illegible]	[illegible]	[illegible]
[illegible]	[illegible]	[illegible]	[illegible]	[illegible]
Total Costs	[illegible]	[illegible]	[illegible]	[illegible]

C. Lessons Learned and Reflected in the Project Design

50. The World Bank has relatively little recent environment sector project experience in Zimbabwe to draw on, but the ongoing implementation of the Project Preparation Grant, through an institutional arrangement similar to that which will be used for the main project, was an important step to fine-tune legal, institutional, and project coordination approaches. This said, the Bank has useful experiences from its overall country engagement with Zimbabwe. The Bank has remained engaged with the country through projects, analytical work and Technical Assistance, within the context of the arrears. The experience under projects, such as the Results-Based Financing on health, have demonstrated that effective country-specific project implementation arrangements can be worked out, and more importantly these can deliver much-needed development results for the people. These also have potentially wider demonstration effects - e.g. the GoZ and partners are currently scaling-up the model used in the health project across the country based on the successes under the Bank-funded health project. The experiences from the Bank's knowledge to GoZ's work and technical assistance also demonstrate that with some flexibility in the design of the Trust Funds, they can be an effective way for the Bank to engage on policy and budget issues and contribute to GoZ's work. The Bank has also played an effective convening role on identified areas which shows that it is possible for the Bank to bring its leverage even when direct Bank funding is not possible due to the arrears.

51. For the protected area investment in Hwange National Park, the World Bank can draw on a vast wealth of experience in protected area projects in other countries of Africa. One important lesson, still being incorporated into standard practice in Zimbabwe, is the importance of incorporating the inputs of local communities in the actual protected

area management. Further information on how these concepts will be operationalized, based on best practices, are detailed in the Process Framework, one of the project safeguard instruments, discussed in more detail in Annex 3.

52. Experience has demonstrated that in other drought-prone areas of southern Africa that are highly dependent on pumped groundwater, attention must be paid to the sustainability of groundwater dependent ecosystems (GDEs)[1]. Over the past decade, the droughts experienced in Zimbabwe have been among the worst in the SADC region, in turn undermining the productivity and recharge of groundwater systems. Careful and comprehensive studies and long-term groundwater monitoring programs are important (both extraction and recharge areas). Lessons learned from studies done on GDEs as part of a previous SADC Groundwater and Drought Management Project (GEF, 2005-2011), emphasized that conservation managers need to have insight into the type, location and extent of groundwater systems through an established methodology and mapping. This is particularly the case for HNP where wildlife populations, and thus the main tourist attraction of the park, are highly dependent on artificial water holes. A follow-on project, the Sustainable Groundwater Management in SADC Member States, will start implementation in 2014 and include a Transboundary Diagnostic Analysis (TDA) of the Eastern Kalahari Karoo Aquifer which underlies a major part of the HNP. As part of the TDA, there will be opportunities to establish mutually reinforcing linkages. In this respect, the groundwater study will be financed under Subcomponent 1.1; see Annex 2.

53. Zimbabwe was the first African country to develop a successful community-level approach to the management of wildlife outside protected areas through CAMPFIRE in the 1980s and 1990s. During 1989-2001, CAMPFIRE generated over US$20 million of transfers to participating communities, 89% of which came from sport hunting (Frost and Bond, 2008)[2]. CAMPFIRE enabled communities to benefit from wildlife revenue streams from these areas. For example, in 2011 Tsholotsho and Hwange districts realized US$212,515 and US$54,488, mostly from sport hunting. Such tangible benefits allowed communities to tolerate damage inflicted on their crops and livestock losses. However, very few direct benefits have accrued to individual households and the CAMPFIRE program in the country is in decline.

54. An example of the underperformance of CAMPFIRE in recent years is provided by Sidinda Ward (37,500 ha) in Hwange District. The district received significant dividends from hunting safaris since the introduction of CAMPFIRE to the area. However, poor performance by the then safari operator in 2008 resulted in the loss of revenues by communities who subsequently resorted to wildlife poaching. This effectively reduced the hunting quota of the area.

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[1] GDEs are ecosystems that must have access to groundwater to maintain their ecological structure and function.

[2] Frost, Peter and Ivan Bond, 2008. "The CAMPFIRE Programme in Zimbabwe: Payments for Wildlife Services" Ecological Economics 65(4): 776-787.

55 A wealth of studies and reviews[1] have looked at the CAMPFIRE experience and have generally concluded that although individual community areas or projects have not always been successful, there is still a long legacy of initiatives which have generated resources for local communities from wildlife, a rare example of an incentive for local communities to be supportive of conservation. Lewis and Bond (2006) noted 5 lessons from the CAMPFIRE experience: community-level commercial transactions can seldom be pursued in isolation; non-differentiated payments weaken incentives; start-up costs can be high and may need to be underwritten; competitive bidding can allow service providers to hold on to rents; and schemes must be flexible and adaptive.

56 The land degradation component of the project deals with a number of difficult inter-related issues, of which a major one is the ongoing expansion of gullies. The Bank has a major gully control project in Nigeria and has implemented a sodic soils project in India. During the project, a study tour is planned to further learn from the best international experiences.

57 Activities that will be promoted under the land degradation component may need to include improved water management, conservation agriculture[2], improving crop and grazing land management, and agro-forestry. Working with women will be essential as they play a critical role in natural resource and forest conservation. Thus, issues around use of indigenous fruit trees for income generation as well as community works that involve rehabilitation of degraded lands will be promoted.

58 Some researchers have shown that gully erosion, while highly visible, may not always be the most important issue to be tackled[3]. Sheet erosion for example may be more problematic, although less immediately obvious. In the preparatory work for the land degradation component under this project, it will be important to more carefully review the existing research on gullies and its applicability to the local context.

59 Finally, the concept itself of the Hwange-Sanyati Biological Corridor is inspired by a relatively large number of similar corridor initiatives in southern Africa which have taken on board the importance of maintaining habitat connectivity across large swathes of the landscape, for keystone species such as elephants. For African countries that still have wildlife populations outside of protected areas, this landscape-based approach is a viable proposition. The considerable amount of work and research that has gone into the development of the KAZA TFCA has shaped the development of the HSBC[4], which itself is an integral part of this transboundary initiative (see Annex 8 for further details).

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[1] In addition to Lewis and Bond (2006) cited above, see a range of publications at http://www.campfirezimbabwe.org. A good review is presented in Alexander J & J Mackenzie (2006) "Wildlife and Politics: CAMPFIRE in Zimbabwe", *Development and Change* 37(3): 605-627.

[2] See, for example, I. H. M. Mavunze, and F. Muzamani (2006) "Conservation Agriculture in Zimbabwe: some comments and background studies", a paper presented at the SARD Regional Conference on Sustainable Land Management, Windhoek, Namibia, 7 - 11 September.

[3] Lynch, K. and R. Maseyk (2006) *The Lie of the Land: Challenging Received Wisdom on the African Environment*. Oxford: James Currey. A chapter by Mike Stocking refers in part to Zimbabwe.

IV IMPLEMENTATION

A. Institutional and Implementation Arrangements

60. The Ministry of Environment, Water and Climate (MoEWC) is ultimately responsible for environmental issues in Zimbabwe and will provide oversight of the project operations which will be executed by WWF-Zimbabwe. MoEWC is responsible for policy formulation, strategy development and executing government programs in the environment sector including water issues and climate change. The Ministry of Finance and Economic Development (MoFED) will sign the grant on behalf of the Government of Zimbabwe (GoZ).

61. During implementation, the project will focus on building capacity within Government. The Bank will assess progress in this regard and discuss with the Government any changes to the project implementation arrangements which may be suggested by the Government, WWF-Zimbabwe, or the World Bank.

62. The Parks and Wildlife Management Authority (PWMA) is a parastatal under MoEWC. It derives its mandate from the Parks and Wildlife Act of 1996 and its subsequent amendments. The Act empowers the Authority to effectively and profitably manage Zimbabwe's wildlife resources for the benefit of present and future generations.

63. The Authority has a staff complement of 3,225 people strategically located throughout the country. It does not receive government transfers but manages the parks by commercializing its operations - "natural resources paying for their own conservation". This has resulted however in severe under-capitalization and cash flow problems that continue to erode its capacity to sustainably manage the parks. Funding for the protection and development of the national parks has declined from US$200 per square km in 1980 to an estimated current value of US$19 per square km. A comparative figure for Kruger National Park in South Africa is US$2,000 per square km. In 2011 PWMA had a recurrent budget of US$19.8 million of which US$11.4 million went to staff salaries. A total of US$0.9 million was allocated to capital expenditures. The PWMA will oversee the biodiversity parts of the HSSC project.

64. The Community Areas Management Programme for Indigenous Resources (CAMPFIRE Association) is the lead agency for the community livelihoods subcomponent. It implements a community-based natural resources management program developed by the Government of Zimbabwe in the late 1980s, piloting the generation of income for rural communities. CAMPFIRE operates with the support of the Zimbabwe Parks and Wildlife Management Authority, and is an association governed by its member RDCs (58 out of 60 participate). The Association is legally recognized as a Welfare Organization (WO 15/94) registered in Zimbabwe under the Welfare Organizations Act (Chapter 91).

65. The Environmental Management Agency (EMA) is a parastatal under MoEWC, responsible for the sustainable management of natural resources and protection of the

environment, prevention of pollution and environmental degradation, and preparation of national environmental management plans. EMA is responsible for the land degradation subcomponent of the HSBC project. Its mandate is derived from the Environmental Management Act. The Agency has a staff complement of 260 people located throughout the country. Its funding comes from two sources – namely own-revenue generation efforts and government transfers. In 2010, the Agency generated US$8.2 million and received US$0.8 million in government grants for recurrent expenditures. Of the total amount, US$2.7 million went towards staff costs. Capital expenditures totaled US$1.1 million that year.

66. Finally, the Forestry Commission (FC) is another parastatal under MoEWC. Its mandate is derived from the Forestry Act, as amended in 1999, and is to provide for regulation, management, and capacity enhancement within Zimbabwe's forestry sector. The Act regulates forest use on state land, communal farming areas, and gazetted forests. The Commission has a staff of 673 people located throughout the country. Its main funding sources are Government of Zimbabwe (GoZ) transfers and revenue from own resources. The organization's plan is to progressively increase own revenue receipts and reduce its dependence on government transfers. In 2012 it had a recurrent budget of US$4.8 million from GoZ (of which US$4.4 million for salaries) and US$2.8 million from own resources. A total of US$0.8 million was allocated to capital expenditure. The FC is responsible for the forestry management subcomponent of the project. The FC is also responsible for the REDD+ agenda in Zimbabwe and under this project will receive training and capacity building, in part provided by WWF.

67. The project will be executed by WWF-Zimbabwe that has a long presence in the country and involvement in support of the environment sector. The main responsibilities of WWF-Zimbabwe will include: (i) all fiduciary aspects of the project including overseeing financial management and procurement, contracting of independent auditors and project reviewers; (ii) targeted technical assistance (TA) and training as needed; (iii) management and coordination of the monitoring and evaluation system; (iv) preparation of periodic reports; (v) coordination of the communication strategy and outreach and awareness building; and (vi) coordinated and consultation with relevant civic and NGO representatives.

68. A Steering Committee will be established during the first months of project implementation. It will be composed of MoEWC, Ministry of Agriculture, Mechanization and Irrigation Development, Ministry of Local Government, Public Works and National Housing, EMA, FWMA, FC, CAMPFIRE Association, WWF-Zimbabwe and other agencies as needed. During project implementation the committee will advise on annual plans and budgets, review progress reports, and coordinate donor-supported activities. As the executing agency of the project, WWF-Zimbabwe will act as a Secretariat for the Steering Committee.

69. Local communities, rural district councils (RDC's), and non-governmental organizations (NGOs) are all key stakeholders in the implementation of the HSBC project. The sustainability of the project largely hinges on the effective participation of the targeted local communities and their RDC counterparts. A vehicle for community participation

will be the district-level environment committees which in turn are supported by ward-level environment sub-committees. Traditional leaders are represented at both district and ward level through these committees.

70. The project will have a Project Implementation Manual (PIM) that will, amongst other things, describe in detail all the aforementioned institutional and implementation arrangements. The Bank has accepted the use of WWF's Field Operations Manual to constitute the bulk of the PIM, these arrangements are already in place under the Project Preparation Grant phase. A final version of the PIM will be required by Effectiveness.

B. Results Monitoring and Evaluation

71. The project monitoring and evaluation (M&E) framework will serve to: i) monitor and report on implementation progress as agreed in work plans and related budget plans; ii) proactively identify potential bottlenecks in implementation of the activities and decide appropriate corrective actions; and iii) assess and report on the achievement of planned outputs, outcomes, and impacts as per the Results Framework established for the project (See Annex 1).

72. WWF-Zimbabwe will be in charge of coordinating the data collection effort with the other stakeholders and partners and operating the M&E system. It will compile the data collected and prepare regular progress reports to be presented to the World Bank and to the GoZ. Cost for collection of monitoring information is embedded in the project activities. The project team will include an M&E officer.

73. Component 3 will support the FC, PWMA, EMA, and CAMPFIRE Association to operationalize and roll out their respective M&E systems that will monitor the implementation of the activities and ensure compliance with their respective annual work programs.

C. Sustainability

74. For Hwange National Park, the focus on long-term sustainability of park resources (particularly ground water) is a critical component of the project's long-term sustainability. Fortifying relationships with the local communities, to be supported through the project, will be an important element for the sustainability of the park.

75. For the difficult issue of sodic soils which characterize much of the HSBC, the multi-faceted approach to be developed and refined in the decision support tool to be prepared aims at long-term sustainable approaches rather than short-term fixes. In this component and indeed throughout the project, the focus on working with local communities, with the support of CAMPFIRE Association, is critical for long-term sustainability.

76. The very concept of the HSHC is an effort by the GoZ and the various project stakeholders to take into account the entire landscape and long-term development issues to provide more sustainability for project investments than might have been obtained from one-off investments in specific sectors.

V KEY RISKS AND MITIGATION MEASURES

77. Key risks with mitigation measures, include:

a) Targeted local communities could continue to engage in unsustainable practices such as wildlife poaching, timber poaching, or poor land management practices. The project, at a moderate scale commensurate with its limited resources, will tackle this risk through livelihood projects and greater community level involvement with park and forestlands management.

b) Due to limited capacity in the government's environment sector and in the project implementing agencies at technical levels, project execution could face delays. However WWF-Zimbabwe will not only provide close support but also targeted training to build the necessary capacity.

c) Design of the land degradation components is risky because of limited up-front knowledge of scale soil management issues specific to the project areas. Expectations that the project can make an immediate contribution to gully management are not realistic and will need to be managed. As a mitigation measure, major investments under the project will attempt to develop the needed soil management decision support tools and provide training and capacity building.

d) Project sustainability risk is substantial because of the ambitious scale of the corridor-wide project. During project implementation, it will need to be made clear that the project does not intend to bring about major changes across large areas of Zimbabwe but instead primarily aims to provide tools and capacity building, based on limited pilot project investments.

A. Risk Ratings Summary Table

Risk Category	Rating
Stakeholder Risk	High
Implementing Agency Risk	
Capacity	High
Governance	High
Project Risk	
Design	High
Social and Environmental	Moderate

Program and Donor	Moderate
Delivery Monitoring and Sustainability	Moderate
Overall Implementation Risk	**High**

B. Overall Risk Rating Explanation

78. The overall project risk is rated as High due to risk at the country and sector levels in capacity, governance, design, and sustainability.

VI APPRAISAL SUMMARY

A. Economic Analysis

79. As per GEF requirements, an Incremental Costs Analysis has been carried out and is included in Annex 7. Annex 6 provides an economic analysis of the project. Some components and subcomponents of the project aim to yield economic benefits to specific beneficiaries (during the project these benefits will be quantified to the degree possible as part of the M&E efforts):

- Improved management of HNP will, over the long term, increase its draw for tourists and thus economic returns to the State and to adjacent communities partially dependent in some way on tourism revenues.
- Communities that will benefit from the community livelihood investments under Component 1.2 (e.g., stocking of wildlife on communally-managed hunting areas) should see income increases.
- Resolving human-wildlife conflict, a major focus of Component 1.2, is intended to reduce future potential economic damage from wildlife, particularly elephants.
- Improved forest management should reduce long-term management costs (through better fire management for example) and should yield direct benefits to communities who are harvesting non-timber forest products.
- Stabilizing gullies or otherwise addressing land degradation problems in the project area should quickly result in reduced economic impacts that would otherwise occur from loss of infrastructure.

B. Technical

80. The geohydrological assessment of the aquifer of the project area is important to the sustainability of any future groundwater abstraction scheme. Appropriate technology will need to be employed in engineering pumping installations, as well as in monitoring and in new technologies to guide rehabilitation, maintenance and operation of existing wells and pumps. These parts of the project will require careful attention during project implementation.

81. For the purpose of anti-poaching in the HSBC, park rangers will need to be outfitted with better handheld radio equipment, along with a concomitant improvement in the communications system throughout the HNP. Training will be required in the use of these new system(s).

82. During the appraisal mission, considerable attention was paid to the challenges in addressing the sodic soils issues in the HSBC. It will be important to draw on experiences from similar areas in the development of the proposed decision support tools.

C. Financial Management

83. WWF-Zimbabwe will be the implementing entity for the HSBC Project and will be responsible for the financial management of the project. In accordance with the Financial Management Manual issued by Operations Policy and Country Services (OPCFM), the Bank carried out a financial management assessment on March 1, 2010 and updated the assessment in January 2014. The objective of the financial management (FM) assessment is to determine whether the financial management system put in place by WWF-Zimbabwe is capable of supporting the implementation of the HSBCP in Zimbabwe. In particular, the assessment aims to determine whether there are adequate FM arrangements to ensure that project funds will be used only for intended purposes and in an economical and efficient way; (b) whether the financial reports of the HSBCP will be prepared in an accurate, timely and reliable manner; (c) whether the project's assets will be safeguarded. The assessment concluded that WWF-Zimbabwe has adequate FM arrangements to satisfy the Bank's minimum requirements under OP/BP 10.02. The overall financial management residual risk rating for the project is low. For further information on FM arrangements, please consult Annex 3.

84. WWF-Zimbabwe is currently managing the Project Preparation Grant so has already accumulated good experience on World Bank requirements with respect to financial and disbursement issues. Additionally, WWF-Zimbabwe has had significant experience managing various multilateral and bilateral projects. Audited Financial Reports with unqualified (clean) audit opinions have been issued for the years ended June 2010, 2011, and 2012. The HSBCP accounts will be audited by a reputable external audit firm and accounting and audits will be conducted in accordance with sound and

internationally recognized accounting and auditing principles and practices satisfactory to the Bank. The audit reports and related project accounts will be submitted to the Bank within six (6) months after the end of the fiscal year.

D. Procurement

85. WWF-Zimbabwe will be responsible for all procurement under the project. Accordingly, a procurement capacity assessment of WWF-Zimbabwe was undertaken in accordance with the World Bank's Procurement Risk Management System to assess overall project risk and identify mitigation actions. The initial assessment was carried out on March 10, 2011 and updated in June 2013. Based on the agency procurement implementation risk assessments, the overall Assessment of Risk was assessed as Moderate. Measures required to address procurement risks were summarized in the Procurement Risk Assessment and Management System. Full details of the procurement arrangements for the project can be found in Annex 3.

E. Social (including Safeguards)

86. Community participation will be supported through local institutions present in the HSNP and through CAMPFIRE, a community-based organization working in the HSNP for several decades. Consultation with communities in the past has clearly indicated the need for alternative livelihood activities to improve the sustainable management of the area's resources. With its community-driven development focus, traditional leaders and community members were integral in the decision-making on investment choices. Awareness building will also be carried out with the support of chiefs and other individuals with high standing in the community.

87. While women and youth carry out a large proportion of the agricultural labor in Zimbabwe, relatively few have meaningful decision-making power. The project will seek to address gender and social inclusion issues in the project area through the use of participatory processes, and the monitoring and evaluation of project results. Where appropriate, the project will coordinate activities with NGOs that promote socio-economic empowerment of women and youth.

88. Annex 7 includes more details on social safeguard issues. Social issues in general are covered in the ESMF (see below). With regard to resettlement, there will be no acquisition of land, or negative impacts on assets, with respect to this project. However, the Involuntary Resettlement Policy has been triggered as project activities are intended to reduce access to natural resources, albeit illegal access, in the HNP and forest reserves. A Process Framework (PF) has been prepared which will focus on ways that the project can include communities in conserving park resources and benefitting from park activities.

89. A small area outside of but adjacent to the southeast corner of the HSNP is home to Indigenous Peoples, members of the San people (commonly known as Bushmen). The Indigenous Peoples Policy, however, has been triggered as some project interventions under Component 3 (Corridor Sustainability) are expected to positively impact the San: mapping of land use patterns within the corridor, development of a strategy for landscape-based management of HSNP resources, a communication strategy for HSNP, and outreach activities. As necessary, the latter need to be tailored to be culturally appropriate for the San. In addition, they are stakeholders in the management of the HNP.

90. An Indigenous Peoples Planning Framework (IPPF) was prepared as it is not known which activities will be initiated and will affect in some way San populations until project research, studies, designs, and strategies are completed. Once it is determined how to involve communities throughout the corridor area, an Indigenous Peoples Development Plan (IPDP) will be prepared to ensure project interventions will better improve San opportunities to participate and benefit from project activities in ways which are culturally appropriate.

F. Environment (including Safeguards)

91. From an environmental standpoint, the main issues include: i) subproject investments in the HNP and in the forest reserves and in Component 2 livelihood investments (such as buildings, track maintenance, fire breaks, etc.) could have minor impacts; ii) water hole management investments if poorly implemented could potentially result in depletion of groundwater resources (the project itself will however be supporting development of groundwater management strategies); and iii) land degradation subprojects could involve minor impacts.

92. The proposed project is considered a category 'B' project since the anticipated impacts will be small-scale and site-specific and can be mitigated. There will be no large scale, significant, or irreversible concerns. The expected environmental impacts of the project will be net positive.

93. To address potential environmental and social issues under the project (see also the IPPF and PF as noted above), the Recipient has prepared an Environmental and Social Management Framework (ESMF). The ESMF describes the various steps of the environmental and social management and monitoring required by this project – from subproject screening to implementation, monitoring and supervision – along with a clear description of the roles and responsibilities of the various entities involved in the project's safeguards function.

Annex 1: Results Framework and Monitoring

Country: Zimbabwe

Project Name: Hwange-Sanyati Biological Corridor Project (P124625)

Results Framework

Global Environmental Objectives

[illegible]

To develop land use and resource management capacity of managers and communities in the Hwange-Sanyati Biological Corridor (HSBC).

These results are at Project Level

Global Environmental Objective Indicators

				Cumulative Target Values						Data Source / Methodology	Responsibility for Data Collection
Indicator Name	Core	Unit of Measure	Baseline	YR1	YR2	YR3	YR4	End Target	Frequency		
Improved management of Hwange National Park		Number	51.00			59.00		68.00	Project start up, MTR, EOP	METT surveys	PWMA, WW
Stable carbon sequestration in project forest reserves		Percentage	0.00					0.00	Start-up and EOP	Amount of carbon to be measured using ground and remote	FC, WWI

											satellite surveys	
Land area where sustainable land mgt practices were adopted as a result of project	X	Hectare(Ha)	0 (0)			2000 (0)		500 (0)	MTR and EOP	Field surveys	FMA, WWF	
Direct project beneficiaries	X	Number	0 (0)			30000 (0)		20000 (0)	MTR and EOP	Surveys	WWF and partners	
Female beneficiaries	X	Percentage Sub-Type Supplemental	0 (0)			40 (0)		50 (0)	MTR and EOP	Surveys	WWF and partners	

Intermediate Results Indicators

				Cumulative Target Values							Data Source	Responsibility for
Indicator Name	Core	Unit of Measure	Baseline	YR1	YR2	YR3	YR4	End Target	Frequency	Methodology	Data collection
Areas brought under enhanced biodiversity protection (ha)	X	Hectare(Ha)	0 (0)			0 (0)		0 (0)	MTR and EOP	MFFI surveys	PWMA
Reduced poaching incidents		Number	956 (0)	400 (0)	800 (0)	600 (0)	500 (0)	400 (0)	Annual	Surveys	PWMA
New areas outside protected areas managed as biodiversity-friendly (ha)	X	Number	0 (0)			2000 (0)		10000 (0)	MTR and EOP	Surveys	CAMPFIRE

Reduced human-wildlife conflict		Number	100 (0)	90 (0)	80 (0)	70 (0)	50 (0)	90 (0)	Annual	Surveys	PWMA, CAMPFIRE
Forest area brought under management plans	X	Hectares(ha)	0 (0)			250,000 (0)		157,000 (0)	MTR and EOP	Surveys	FC
Capacity building of beneficiaries		Percentage	0 (0)			50 (0)		90 (0)	MTR and EOP	Surveys	WWF and partners

Annex 1: Results Framework and Monitoring

Country: Zimbabwe

Project Name: Hwange-Sanyati Biological Corridor Project (P124625)

Results Framework

Global Environmental Objective Indicators

Indicator Name	Description (indicator definition etc.)
Improved management of Hwange National Park	The METT index is a proxy measure of how effectively the park is managed, taking into account financing, community involvement, threats, and other factors
Stable carbon sequestration in project forest reserves	Percentage change in the amount of carbon sequestered in forest reserves areas as based on ground and remote sensing surveys, measuring tC/ha
Land area where sustainable land mgt. practices were adopted as a result of project	This indicator measures the land area that as a result of the Bank project incorporated and or improved sustainable land management practices. This indicator can track progress in and sustainability at farm scale and at landscape scales within agroecological zones, watersheds, or basins. The baseline value for this indicator is expected to be zero. Specifically for this project, this indicator measures areas where successful actions are undertaken to manage and or remediate areas of wide and annually subject to gullying
Direct project beneficiaries	Direct beneficiaries are people or groups who directly derive benefits from an intervention (i.e., children who benefit from an immunization program, families that have a new piped water connection). Please note that this indicator requires supplemental information. Supplemental Value: Female beneficiaries (percentage) Based on the assessment and definition of direct project beneficiaries, specify what proportion of the direct project beneficiaries are female. This indicator is calculated as a percentage. Specifically in this project, this core indicator will measure the total number of direct beneficiaries from PA forestry and land degradation components
Female beneficiaries	Based on the assessment and definition of direct project beneficiaries, specify what percentage of the beneficiaries are female

Tools or tables or explanations specific to this project and which supplement the default descriptions which are standard for World Bank core indicators

Intermediate Results Indicators

Indicator Name	Description (indicator definition etc.)
Areas brought under enhanced biodiversity protection (ha)	This is a proxy indicator that measures biodiversity protection as a result of the World Bank operation through formally converting an area into a protected area and establishing a functioning management system, or, improving the management system of an existing protected area. Under this *GEF* component core indicator *METT scores* of a PA are placed in one of three broad categories of management and an increase in areas under certain of protection only results when the PA shifts from one category to another. This is not expected to happen with *HNP* projects as expected to larger and real in the category of METT, a "basic functioning management system" is the end target [illegible]
Reduced poaching incidents	A poaching incident is an observed infraction (e.g., a poached animal, a poacher's camp, an arrested poacher)
New areas outside protected areas managed as biodiversity friendly (ha)	This indicator measures the number of terrestrial hectares outside protected areas where, as a result of the World Bank operation, the site is managed at least in part to obtain biodiversity gains. Under this project, this core indicator serves to measure the community-managed hunting areas that will benefit from stocking and management.
Reduced human-wildlife conflict	Incidents of HWC are the indicator to be measured. These include reported incidences of significant damage to crops, property, or people caused by wildlife (such as elephants or lions)
Forest area brought under management plans	This indicator measures the forest land area which, as a result of Bank investments, has been brought under a management plan. This includes production and protection forests as well as other forests under sustainable management. The baseline value is expected to be zero. Under this project, this core indicator measures the number of ha of the two target forest resources which will benefit from improved management
Capacity building of beneficiaries	Intended beneficiaries of capacity building demonstrate meaningful knowledge of project-developed tools

Annex 2: Detailed Project Description

ZIMBABWE: Hwange-Sanyati Biological Corridor Project

1 The Project Development Objective is "to develop land use and resource management capacity of managers and communities in the Hwange-Sanyati Biological Corridor (HSBC)." The Hwange-Sanyati Biological Corridor covers six districts namely: Bubi, Gokwe North, Hwange, Kwekwe, Nyaminyami, and Tsholotsho.

2 **Component 1: PA management and community livelihoods** (US$10.025 million of which US$1.795 million is GEF financing and US$8.23 million is parallel financing). Zimbabwe has 26 protected areas that consist of 11 national parks, 6 safari areas, 10 recreational parks, 2 botanical gardens, and 2 botanical reserves that together cover 5.2 million ha. The 26 areas constitute the Parks Estate. While the HSBC encompasses three national parks (Hwange, Chizarira and Matusadona) as well as Chete and Chirisa Safari Areas, the project's main focus will be on Hwange National Park (HNP) as it is the largest park and is a biological reservoir for most of the wildlife found in the corridor.

3 The park has a surface area of 14,651 km². Hwange National Park has outstanding national and global biodiversity importance (see Annex 8 for more information on the biodiversity of the park). The management of the HNP is based on a park management plan, the last version of which covers the period 1996-2003. The plan embraces activities such as fire management, game water supply, wildlife management, and infrastructure development, but needs to be updated. Operational plans are done annually. The African Wildlife Foundation is funding the preparation of a new management plan for the park, to be completed in 2015. Inadequate financial and human resources compromise the management of the park. HNP is patrolled by a contingent of about 240 rangers at any given time. This translates to only one ranger per 5000 ha, inadequate for a park under heavy poaching pressure. In 2011, HNP had an annual recurrent budget of US$2.11 million of which US$1.24 million went to salaries and allowances. Its capital expenditure for that year was nil.

4. Because HNP must in effect generate its own revenues, tourist visitation is extremely important. Increasing the number of tourists and sustaining these numbers are critical for the long-term sustainability of the park. The table below presents data on tourist arrivals in HNP. Significant increases since 2011 are attributable to increases in both domestic and foreign visitors.

YEAR	LOCAL	FOREIGN	TOTAL
2005	17680	7102	24782
2006	11715	7736	19451
2007	10878	7754	18632
2008	6757	4612	11369
2009	10062	5240	15302
2010	10192	7817	18009
2011	18002	13218	31220
2012	20495	18742	39237
2013	22053	22359	44412

5. Water holes were first drilled in HNP in about 1965, when elephant numbers had declined to about 2000, due to lack of water. With 56 active water holes in the park at this time (of 80 that have been drilled), the program has been successful in allowing a huge increase in elephant numbers, to about 50,000. However the sustainability of the current rate of water extraction is unknown. This in turn raises questions about the sustainability of the total population of elephants. Currently unacceptable levels of damage to the vegetation are being observed in the vicinity of the active water holes. The carrying capacity of the park for elephants remains to be calculated but will be in large part a function of the number of future water holes and their placement.

6. The HNP overlaps in part with the transboundary aquifer, the Eastern Kalahari Karoo Basin (shared with Botswana). The aquifer is one of approximately 24 transboundary aquifers in the SADC region. The lithology of the Eastern Kalahari Karoo Basin[19] is of upper Karoo sandstone partially covered by basaltic volcanics with some primary porosity and fractured permeability, forming confined to semi-confined aquifers. According to the British Geological Survey, the location of the aquifer is "on a plateau-like watershed" between the Nata River in the west and the Zambezi River in the north.

7. A Transboundary Diagnostic Analysis (TDA) for the Eastern Kalahari Karoo Basin is included in the upcoming World Bank Sustainable Groundwater Management in SADC Member States Project (also GEF supported, 2014-2019). The TDA will promote collaboration between Zimbabwe and Botswana on developing shared solutions to any current or future management issue of groundwater. There are further opportunities for mutual benefits for groundwater studies and interventions in the HSBC and the SADC Groundwater project. The latter project will include the operationalisation of the SADC Groundwater Management Institute (hosted by the University of the Free State in South Africa on behalf of SADC Member States) who will fulfill the role of interlocutor of groundwater knowledge and training in the region and thereby, abilities to partner with localized activities such as that proposed under the HSBC.

8. Some challenges specifically facing HNP include:

[19] Ibrekk, Jeff, Nick Robins, John Carr et al. 2013. "Identifying transboundary aquifers as a tool of international resource management in the Southern African Development Community Region". *Hydrogeology Journal* 21: 329

- Subsistence and commercial wildlife poaching. Some 600 snares were recovered in 2012. In addition 32 poachers were arrested. Since 2006 the number of recovered snares has been steadily increasing but the number of arrested poachers is declining. Cyanide poisoning of waterholes to poach elephants resulted in the death of about 100 elephants in HNP in 2013, a tragic case that attracted worldwide attention

- Uncontrolled forest fires. In the period 2007 to 2012 about 10% of the park was being burned each year in controlled burns. An additional unknown amount of the park was being affected by wild fires that were not controlled burns, and the ecological costs and benefits are currently not well understood

- Inadequate game water supplies. Of a total of 80 watering points in the Park, only 56 are currently functional. This forces wildlife to aggregate at a limited number of watering points, resulting in habitat destruction. Since its inception, the Park has been abstracting underground water for wildlife during the dry season. However, the sustainability of such water abstraction in the long run has never been assessed and remains unknown

- Human-wildlife conflict (HWC) resulting from animals that originate in the HNP, principally elephants, is a major preoccupation of neighbouring communities and an important source of conflict between the park and those communities. From 2009 to 2012 reports of elephant HWC have remained stable at about 90/year and less HWC have been increasing to about 20/year

9. The aim of this component is to improve management of the Hwange National Park and the livelihood of communities involved in stewardship of the natural resources in the buffer area of the HNP. The component will focus primarily on Hwange and Tsholotsho Districts, the only districts in the HSBC that share boundaries with the HNP

10. *Subcomponent 1.1 Improved management of Hwange National Park.* This subcomponent would finance investments for improving park management, improving water and game water supply management, and supporting essential research and monitoring. Specific activities to be supported would include:

a) Updating annually the HNP operational plan, in collaboration with buffer communities and relevant RDC's; substantially involving local communities has not been previously done

b) Training and better equipping of park rangers (vehicles, field equipment, GPS units, camping equipment, boots, and uniforms), improving the communications infrastructure of the park.

c) Support to anti-poaching initiatives above and beyond general support to park rangers. The project will help support coordination with a range of anti-poaching initiatives both nationally and regionally. The World Bank is currently managing a GEF-financed project to combat elephant poaching in Africa and synergies will be sought with that

project, possibly to develop additional projects in Zimbabwe focused on elephant poaching

d) A comprehensive study on groundwater hydrology in the HNP to assess the sustainability of various extraction regimes and to monitor the ecological effects of artificial water supply. As noted above, it is intended that this study will be carried out jointly with the World Bank SADC groundwater project. The details of this collaboration will be determined in the first months of the project

e) Strategic drilling of boreholes in the park, if compatible with the results of the groundwater study, to minimize overgrazing and over-abstraction in some areas and begin pumping in other areas; explore alternative means of water abstraction, investigate and put into practice alternative ways of minimizing seepage from existing pans

f) Vegetation monitoring baseline survey will be done in first year of project, based on analysis of remote satellite imagery. It will be repeated at end of project, to understand ecological changes in the park and to monitor possible impacts from fire or anthropic modification of park areas.

g) A thorough assessment of the fire ecology of the HNP (also to cover forest reserves covered under Component 2). This is intended to be a one-time study. The study will inform a fire management plan which is prepared each year, but without a good understanding of the ecological implications of the current fire management strategy in the park.

h) Conduct wildlife aerial surveys to assess the numbers of indicator species wildlife populations. Surveys will be carried out in 2014 and 2018. The last aerial survey carried out in HNP was in 2006

11 *Subcomponent 1.2: Improved community livelihoods through wildlife management.* This subcomponent will support investments in the buffer areas of HNP through the restocking of wildlife areas; mitigating human and wildlife conflict (HWC), provision of appropriate training to the relevant RDCs, conservation sub-committees and communities; and conducting research on HWC mitigation. It will support the CAMPFIRE system that will open new opportunities to communities to allow them to play a greater role in the management of their natural resources (largely through trophy hunting quotas that create employment for local populations as well as revenue for infrastructure projects)

12. Investments will include consultants, operational field and office costs, meeting and training costs, game capture and game transport costs, vehicles and motorbikes, computer equipment, works, and communication equipment. Specifically, the subcomponent will:

a) Improve the income of Sidinda Ward communities through the restocking and sustainable use of its wildlife under public-private community partnerships based on an appropriate management strategy. An ecological study will be carried out to define

carrying capacity in the wildlife conservation area. Other investments will: carry out restocking, establish and nurture PPPs, strengthen Environment Sub-committees, enhance the monitoring capacity of communities, and produce a business plan. There is currently one inactive PPP safari operator in the Sidinda area and many others who are interested in establishing a PPP agreement with the communities.

b) Conduct research on HWC with emphasis on a deeper understanding of HWC dynamics and the development of effective mitigation measures. Costs will include collaring and tracking of some elephants and possibly aerial surveys if justified (to be coordinated closely with aerial inventories planned for HNP).

c) Improved HWC in selected wards of Tsholotsho District. Investments will include surveillance mechanisms, implementation of mitigation measures, raising of awareness and community capacity, promotion of chili cultivation, and monitoring of changes in HWC and wildlife damage. Lessons learned will be applied to other districts but the limited project funding will not permit major investments in HWC outside of Tsholotsho District.

d) Support Environment sub-committees (community level committees; for further information see table in Annex 5) to assume their responsibilities as mandated under the Environment Management Act. This legislative provision is yet to be tested in wildlife producing areas.

13. **Component 2: Improved forest and land management** (US$9.54 million of which US$3.24 million is GEF financing and US$6.3 million is parallel financing). The aim of this component is to improve forest and land management across the HSBC by developing tools to address land degradation, land use change, and deforestation.

14. *Subcomponent 2.1 Improved forestry management.* Zimbabwe has 24 gazetted indigenous forests that cover about 800,000 ha. Their size ranges from 567 ha (Lingwe) to 144,000 ha (Gwaai). The forests were gazetted between 1926 and 1960 to control harvesting of commercial indigenous timber species used to produce mine props, railway sleepers, flooring parquets, and furniture. The forests are important for watershed and soil protection (catchment area protection), biodiversity conservation, wildlife habitats and as a source of commercial timber and non-timber forest products such as honey, mushrooms, edible insects and indigenous fruits.

15. Gazetted forests contribute to the forestry and tourism sectors. Substantial quantities of indigenous timber products are exported as furniture, flooring, and wood carvings. In addition, the forests generate revenue from photographic safaris and sport hunting. With respect to hunting, there can be as many as 360 hunts nationally, lasting 14 to 20 days each, per hunting season (May to October). Sport hunting and photographic safari operations employ substantial numbers of people. Depending on the size of the safari outfit, there could be up to 25 people employed in catering, grounds maintenance, game tracking, and hunt guiding.

16. Five of the country's 24 gazetted indigenous forest areas are found within the HSBL: Sikumi, Ngamo, Mzola, Kavuu and Sijarira. The project will focus specifically on the Sikumi and Ngamo Forests that are adjacent to the HNP and consequently provide continuity for wildlife movement within the corridor. Unlike other gazetted forests, there is neither commercial timber logging nor human settlements in the two forests although the neighbouring communities access the forests for grazing, thatch grass, firewood, and other non-timber forest products. No timber logging is allowed in the two forests as this would conflict with their intended vocation targeted to photographic and hunting safaris (the forests were initially gazetted for their conservation value and ecosystem function).

17. The Sikumi Forest (see map at end of report for location of the two forest reserves) is 54,400 ha. The *Acacia* woodland covers a significant portion of the forest and a small portion consists of Mopane and *Baikiaea* teak woodlands. The Ngamo Forest is 102,900 ha. It is mostly composed of *Baikiaea* woodlands. Dominant species include: *B. plurijuga* (Zambezi teak), *Guibourtia pluriingii*, *Pterocarpus angolensis* (mukwa) and *Afzelia quanzensis* (pod mahogany). Small pockets of *Acacia* are found in low lying areas.

18. Forest management plans for the two forest areas exist although they are now outdated, covering only the period from 2004 to 2008. Forest management plans provide for zonation of activities such as sport hunting, photographic safaris, collection of non-timber forest products, and livestock grazing. The two forest areas specifically face a number of important challenges. From 2009 to 2013, 50 commercial timber poachers were arrested in the two reserves. Subsistence and commercial wildlife poaching is problematic. Some 504 snares were recovered during 2009-2013. In addition 89 poachers were arrested during the same period. The two forests measure 157,300 ha in total and are only patrolled by a contingent of 12 guards at any given time. This translates to one guard per 13,000 ha. Furthermore, the two forests share one vehicle for guard deployment and forest monitoring.

19. The tables below show the trends in wildlife and timber poaching in Sikumi and Ngamo forests from 2009 to 2013.

Forest Area	Year	Arrests made	Snares removed
Sikumi/ Ngamo	2009	12	63
	2010	14	230
	2011	26	45
	2012	20	33
	2013	17	133

Forest Area	Year	Arrests made	Items Confiscated
Sikumi/ Ngamo Timber poaching	2009	7	5 cords of firewood, 1.2m³ of timber
	2010	x	3 tons of fire wood, 16 giraffe canes
	2011	16	109 bull canes and 195 other canes
	2012	12	8 cords of firewood and 104 canes
	2013	7	18 cords of firewood and 27 canes

20. From 2009 to 2013 the forests recorded a total of 33 forest fires that affected 123,081 ha. Inadequate game water supplies affect wildlife numbers. Of a total of 15 watering points in the two forests, only five are functional. This forces wildlife to aggregate at few watering points, resulting in habitat destruction. Forest degradation due to extensive elephant damage and fires, among other things, is contributing to changes in species composition as evidenced by the increasing dominance of *Terminalia* species in what was botanically a teak-dominated ecosystem. There is also some emerging evidence of increases in formerly non-resident species that are taking advantage of changes in the ecosystem within the forest areas and indeed across the corridor. However very little is known about such invasive and alien species (IASS) in the HSBC, especially terrestrial ones. Invasive species could increasingly have adverse impacts on the entire corridor's biodiversity ecosystem if the problems are not better understood and addressed.

21. Local communities are involved at a number of levels such as during the preparation of forest management plans and in community-level fire brigades. However, heightened efforts are needed to more substantively involve local communities in the management of the forest reserves.

22. Data on carbon storage in these forest reserves has not been collected. It is possible however to make reformed estimates based on typical values for dry woodlands and forests in Africa[12]. Forests typical of the *Acacia*, Miombo and *Baikiaea* woodlands that characterize the two forest reserves store on average between 45 and 55 tC/ha, so a rough estimate of 50 tC/ha is used for the project forest areas as a predicted baseline. Of this amount, about 25 to 35 tons of carbon are above ground and a conservative 20 tons of carbon in roots. These values will be confirmed through ground and remote sensing inventories to be carried out in the first year of the project[13]. Because of the fire and

[12] Detailed data on African dry forest carbon storage is included in the World Bank's Project Appraisal Documents of the Burkina Faso Forest Investment Program – Decentralized Forest and Woodland Project (2013).

[13] Some experts, according to WWF-Zimbabwe, estimate values of 15 to 30 tC/ha in these forests in Zimbabwe. The initial surveys under the project will help reduce any disparities in the current estimates. Any gaps may be due to different considerations of whether or not subsoil carbon is considered.

timber poaching noted above, it is assumed that the current trend is that of decreasing carbon sequestration (if possible, this will have to be confirmed by analysis of a historical series of satellite images). A rough estimate would be that, in the absence of the project, the amount of carbon sequestered in the forests would decline by about 5%, that is, about 2.5 tC/ha. It is considered that improved forest management over the project five year period will lead to stable carbon sequestration in the forests, that is, an avoided loss of about 393,000 tC, or 1.441 million tCO2-equivalent.

23. Zimbabwe was admitted as a partner of the UN-REDD Program in 2013. This enables the country to participate in UN-REDD programs, including funding opportunities. Zimbabwe is also finalizing its Climate Change Response Strategy in which REDD+ is an important component. The country has plans to identify a site to pilot a national REDD+ project. A number of private companies, including Kariba REDD, have embarked on REDD+ activities with a focus on the voluntary market, however information on these initiatives is not readily available. The Forestry Commission needs capacity to spearhead the REDD national effort, which is in its first stages.

24. Leakage effects in this project are a possibility, which is to say reducing carbon loss in project area but at the expense of increased carbon loss elsewhere. Potential leakage in the current project might result from an activity-shifting leakage (that is, people leaving the project area to cut trees elsewhere). The issue of leakage can be addressed at transboundary, national, and local levels.

25. In this project, the project area is explicitly transboundary in nature (thus inherently will already address leakage across boundaries). The large size of the project area is probably the best guarantee of minimized leakage because in such rural areas where fuel wood and charcoal are for local consumption, the labor is not highly mobile. At the national level, the leakage effects will be addressed by helping the country to set up a credible national system for monitoring, assessment, reporting and verification of reductions in emissions from deforestation and degradation. In the project's support of the development of national REDD capacity, it will ensure explicit coverage of leakage.

26. Specifically, the subcomponent will support

a) Better equipping of forest managers workers and implementation of forest management operational plans, including control of timber poaching (equipment purchases to include vehicles, tractors, motor bikes, scanner, plotter, software, computers, and camping equipment)

b) Improving the communication infrastructure of the two gazetted forests, including purchase of communication radios.

c) Supporting fire protection efforts in collaboration with neighboring community fire brigades. Equipment purchases will include firefighting equipment and a fire tower and activities to be supported include maintenance of fire breaks and support to firefighting operations.

d) Enhance anti-poaching capacity in the forests in part by facilitating the functioning of community resource-sharing committees and in part through support to anti-poaching activities of the forest wardens under the FC

e) Carry out a study to better define the direct and indirect drivers of deforestation and forest degradation in the two forest reserves

f) Carrying out detailed assessments of the "readiness" of the two forest reserves to implement REDD+ with emphases on land tenure arrangements of the forest, arrangements for benefit sharing with communities; institutional capacity to establish baselines and to enforce the law to implement REDD+ projects; and the presence of emission reduction accounting capability (viz. monitoring, reporting, and verification)

g) Estimation of carbon sequestration amounts in the Sikumi and Ngamo Forests, in year 1 and at end of the project. Ground and remote sensing approaches would be used to make the determinations of sequestered carbon. This action is necessary to obtain the basic data needed for the results monitoring indicators of the project. At the same time, it will help to build capacity for REDD+ in Zimbabwe.

h) Provide training and capacity building to the FC and to other stakeholders as needed on REDD+. Enhanced national capacity will allow Zimbabwe to potentially participate in and benefit from international efforts such as the Forestry Carbon Partnership Facility (FCPF), other than its current involvement with UN-REDD. Under this set of activities, the project would review and support improvements in institutional responsibilities, in legislative and/or regulatory context, and in adoption by national authorities of fundamental approaches relating to monitoring and verification, to safeguards, benefit sharing, and reporting

i) To take stock of inventory the different invasive and alien species (IAS) found in the gazetted forests in particular, and in the corridor in general, and compile an IAS atlas which will be widely distributed and used as a basis for IAS impact monitoring and devising appropriate IAS management strategies

27. *Subcomponent 2.2: Land Rehabilitation*. The HSHC straddles the Gwayi (87,960 km^2) and Sanyati (74,584 km^2) catchments. These catchments receive 450 to 650 mm of rainfall per annum. Most of the catchments' inhabitants depend on agriculture for survival, growing crops such as maize, small grain cereals, and cotton under rain fed conditions, and tend cattle and goats

28. Land degradation has become one of the greatest threats to biodiversity in Zimbabwe and is driven by both anthropogenic and natural causes drivers. The former include deforestation, poor farming practices, concentrated run off from built up areas structures, stream bank cultivation and poorly constructed conservation works. Natural causes include soil composition and structure. Of particular concern is soil erosion associated with sodic soils. Sodic soils are those having an exchangeable

sodium percentage of greater than 15%.[1] About 16% of Zimbabwe is characterized by sodic soils (Whitlow 1989).[2] A quarter of the country's sodic soils fall within the HSIB[3] project in areas such as Chireya ward of the Umc sub-catchment of the Sanyati catchment. Sodic soils deflocculate, tunnel, and then collapse, forming gullies. For example, the Chireya gully is threatening a hospital, school, and business center in the area.

29 To address this problem, the Chireya community erected check dams, constructed gabions, and planted vetiver grass to try and check the progress of the gully but to no avail. This was partly because these solutions were largely physical and local in nature. They did not take into account the chemical properties of the soils, management of the wider micro-catchment, and the importance of integrated land use planning. While a lot of soil erosion research has been done on croplands, limited focus has been on the rehabilitation of sodic soils. A study by Dye and Walker[4] showed that attempts at reclamation and stabilization of gully crosions and on sodic soils are hampered by inadequate knowledge of the basic physical and chemical properties of these soils.

30 Within the Sanyati catchment, the project will focus on the Umc micro-catchment and even more specifically, on Chireya Ward. The latter sits on sodic soils with poor crumb structure and very prone to chemical crosions. Chireya Ward covers 21,000 ha of land. The area around Chireya business center, especially the mission hospital, is experiencing gully crosion that is threatening the integrity of infrastructure around the center. For example, a gully head has encroached onto the hospital fence and is within 10 meters of the nearest building. The hospital serves a population of 25,000 people. About 500 ha in Chireya is particularly critical because of existing threats to infrastructure (one of the project monitoring indicators is to successful implement management and or remediation of sodic soils in these 500 ha).

31 In order to tackle the land degradation issues of Chireya Ward, representative of a much larger area of the HSIB, the project will undertake activities involving consultants, operational costs, works, a vehicle, and minor goods. Planned investments are the following:

a) Establish key drivers of land degradation; collate available information on sodic soils, and develop a decision support tool for management of sodic soils. This tool will provide guidelines for sodic soil management at a number of temporal and spatial scales. For example, at a very local level and in a short-term perspective, guidelines

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[1] Cooperative Research Centre for Soil and Land Management. 1998. *Introduction to Soil Sodicity*. Government of Australia and University of Adelaide. Available at http://www.dpi.vic.gov.au/dpi/vro/vrosite.nsf/pages/soil_sodicity.pdf

[2] Whitlow, R. 1989. "A Review of Dambo Cultivation in South-central Africa." *Zambezia* 16 (2): 173–190. See http://archive.lib.msu.edu/DMC/African%20Journals/pdfs/Journal%20of%20Zimbabwe%20Studies/vol1no2/jzs_vol1no2_pages169to180.pdf

[3] Dye, P. J. and H. H. Walker. 1980. "Vegetation-environment relations on sodic soils of Zimbabwe." *Journal of Ecology* 68: 640.

will be provided on appropriate emergency containment approaches. At a longer-term and wider scale, the tool will prescribe catchment management strategies.

b) The development of the tool will be supported by targeted site visits (e.g., to other World Bank supported projects tackling sodic soils or gully management).

c) Pilot decision making tool with selected communities within the sub-catchment and in other areas as possible.

d) Support targeted capacity building initiatives on environmental stewardship for Environment sub-committees (community level committees; for further information see table in Annex 3) to assume their responsibilities as mandated under the Environment Management Act.

32 **Component 3: Corridor Sustainability** (US$8.37 million of which US$0.335 million is GEF financing and US$8.035 million is parallel financing). As calculated by EMA, the following table presents the distribution of land use categories within the HSBC.

Proportion of land under each land use within HSBC

Land use system	% area under the land use
Forest land	4.30
Large scale commercial farming areas	4.05
National parks	31.53
Resettlement areas	5.80
Safari areas	5.93
Small scale commercial farming area	0.09
State land	2.14
Communal lands	42.75
Lakes	3.41

33. The very varied land use across the HSBC and the specific environmental challenges of each of them, coupled with the complex institutional landscape of actors, presents a serious challenge to the concept of improving sustainable management across the corridor-wide area. Under this component, project actors led by MoEWC will work together to ensure close coordination and synergy between the different components and project activities, to promote better development planning and coordination at the wider landscape level of the HSBC, and to facilitate corridor-level scaling-up of land management and biodiversity conservation tools and initiatives.

34 Institutionally, the MoEWC will take the leadership on corridor sustainability. Many other actors however (in sectors such as agriculture, transport, human development, etc.) all are key stakeholders in how the HSBC will be sustainably developed in the future. MoEWC will collaborate and work closely with other stakeholders through the Project Steering Committee and a range of other sector-wide coordination mechanisms.

35. Specific activities to be undertaken under this component include:

a) Mapping of land use patterns within the biological corridor

b) Technical support to the units within the ministries to develop a strategy for landscape-based approaches for good management of forests and wider landscape in the HSBC

c) Review and systematically package relevant tools developed in the different project components for wider dissemination and up-scaling to corridor level.

d) Support to develop and implement a communication strategy on this integrated approach for the HSBC that encompasses branding of the HSBC

e) Further solidify the links with KAZA TFCA in support of the transboundary nature of the HSBC, bolster Coordination with KAZA TFCA partners through regular meetings with practitioners and sharing practical experiences on transboundary conservation issues.

f) Build national and regional institutional capacity in climate change and natural resource use analyses, capacity building, awareness creation and support of an information system (whose creation is now underway with UNDP support)

36. **Component 4: Project Coordination** (US$0.875 million of which US$0.275 million is GEF financing and US$0.6 million is parallel financing). Manage and provide oversight of the project, including financial management and audits, procurement, and monitoring and evaluation.

Annex 3: Implementation Arrangements

ZIMBABWE: Hwange-Sanyati Biological Corridor Project

Project Institutional and Implementation Arrangements

Project administrative mechanisms

1. WWF-Zimbabwe will be the executing agency for the project (see the table below for a summary of the institutional roles of each of the key institutional actors in the project). WWF-Zimbabwe has a country office (which also houses regional programs) and a regional office for eastern and southern Africa in Kenya and as an international agency is well situated to provide critical specialized support in capacity improvement. The presence of WWF-Zimbabwe on the ground will provide required back-stopping in specific areas by providing technical assistance (TA) on a timely basis to ensure project execution is done as planned. WWF-Zimbabwe also will play a role in the preparation of related projects for financing by donors that support the overall environmental management effort of the government of Zimbabwe, specifically the Ministry of Environment, Water and Climate, thereby ensuring harmonization and complementarity.

2. The main responsibilities of WWF-Zimbabwe will be: i) all fiduciary aspects of the project including overseeing financial management and procurement including contracting of independent auditors and project reviewer, ii) provision of targeted TA and training as needed, and iii) management and coordination of the monitoring and evaluation system, iv) preparation of periodic reports as agreed in the Project Agreement, v) coordination of communication strategy and undertake outreach and awareness building, and vi) coordination and consultation with relevant civic and NGO representatives.

3. The Ministry of Environment, Water and Climate (MoEWC) is ultimately responsible for environmental issues in Zimbabwe and will provide oversight of the project operations. MoEWC is responsible for policy formulation, strategy development and executing programs in the environment sector (including water issues and climate change). The Ministry of Finance and Economic Development (MoFED) will sign the grant on behalf of the Government of Zimbabwe (GoZ).

4. Since government agencies will be responsible for implementation at the ground level, governmental responsibilities also need to be clearly delineated. To address this, a Grant Agreement will be signed between the World Bank and MoFED, the latter signing on behalf of the Government of Zimbabwe. The Bank and WWF-Zimbabwe will enter into a Project Agreement that clearly specifies the role and modality of project execution and a subsidiary agreement will be signed between the GoZ and WWF-Zimbabwe.

5. During the implementation of the Project Preparation Grant (PPG), HSBC stakeholders were engaged and consulted on the design of the HSBC project and its components. The institutional, as well as financial and administrative, arrangements of the project

were devised, including agreement on the membership of the Project Steering Committee. The management structure for project preparation work and the structure of reporting and coordination responsibilities at technical and local level were also agreed upon.

6. Two international partners are of particular interest, both focused on sustainable development not only of the HSBC but of the larger transfrontier area of which the HSBC is an integral part. First, the Southern African Development Community (SADC) is responsible for the management and coordination of the KAZA TFCA between Angola, Namibia, Botswana, Zambia and Zimbabwe, of which the HSBC and specifically Hwange National Park is such an important part (see Annex 8 for further information). The HSBC Project includes explicit funding to support the KAZA TFCA and SADC-supported KAZA TFCA projects are included as project parallel financing. Secondly, the Zambezi Watercourse Commission (ZAMCOM), whose Secretariat is being established in Zimbabwe, supports strategic planning and development at the level of the Zambezi River basin. A major World Bank-supported grant to the ZAMCOM is part of the project parallel financing and a close relationship between ZAMCOM and the HSBC project will be maintained during project implementation.

7. The details of project implementation will be included in the Project Implementation Manual (PIM), to be completed as a condition of effectiveness. As WWF's Field Operations Manual is acceptable to the Bank as constituting parts of the PIM, and it is in use for the PPG, an advanced version of the PIM is effectively already available.

Roles of Partners

8. The roles and responsibilities of key national partners are summarized in the following table.

National Stakeholders	Roles and responsibilities
Ministry of Finance and Economic Development (MoFED)	The role of the MoFED, among others, is to coordinate the financing of projects by donors and external financiers. They will sign the Grant Agreement on behalf of the Government of Zimbabwe.
Ministry of Environment, Water and Climate (MoEWC)	MoEWC is responsible for policy formulation, strategy development and executing programmes in the environment sector. It will be responsible for leading the Project Steering Committee and overall coordination of the project.
Environmental Management Agency (EMA)	Spearhead the establishment and operation of Environmental Sub-committees. Will be responsible for coordinating the pilot land degradation subprojects in the selected catchment.

Forestry Commission (FC)	Represents government interests in forestry conservation and sustainable use issues on the project. The organization is also responsible within Zimbabwe for REDD+. Will be responsible for coordination the project investments in the forestry reserves.
WWF-Zimbabwe	Overall project oversight and coordination, including financial management and procurement (details above)
Parks & Wildlife Management Authority (PWMA)	Represents government interests on wildlife conservation and sustainable use in the project. In addition to their role in Subcomponent 1.1, they provide oversight and representation on the KAZA TFCA as the national coordination agency for transfrontier conservation areas
CAMPFIRE Association	Represent community interests at various levels. In addition to their role in Subcomponent 1.2, CAMPFIRE will provide assistance in all components of the project for improving participation and capacity of local communities, and for working with Environment Sub-Committees
Rural District Councils (RDCs)	Coordinate land use planning in their respective districts
District Environment Committees	The District Environment Committee is a committee of the RDC responsible for articulating and addressing environmental issues within the district. Half of its members are sitting ward councilors and the other half are members representing independent entities and individuals domiciled in the district. It has traditionally made decisions on behalf of local communities on the management of natural resources. The Environment Management Act now provides for the delegation of these RDC powers to Environment Sub-committees (see below), to improve decision making and allow direct management of natural resource management activities by local communities.
Environment Sub-committees	The Environment sub-committees consist of community members with a passion for the environment, opinion leaders, and the local traditional leadership. It is chaired by a local ward Councilor who also sits on the RDC Environment Committee. The sub-committees are already in place and functional and are intended to replace the District Environment Committees (see above). Their meeting frequency depends on the urgency of the issue at hand and delegation of authority.

Zimbabwe Tourism Authority	Promote eco-tourism joint ventures through public private partnerships. Facilitate community management and use of tourism related information.
Tour & Safari Operators	Invest in relevant infrastructure operations. Market safari hunts and other CAMPFIRE type activities, working collaboratively with CAMPFIRE, PWMA, and the project

Financial Management, Disbursements, and Procurement

Financial Management

9 WWF-Zimbabwe will be the implementing entity for the HSBC Project and will be responsible for the financial management of the project. In accordance with the Financial Management Manual issued by Operations Policy and Country Services (OPCFM), the Bank carried out a financial management assessment on March 1, 2010 and updated the assessment in January 2014. The objective of the financial management (FM) assessment is to determine whether the financial management system put in place by WWF-Zimbabwe is capable of supporting the implementation of the HSBCP in Zimbabwe. In particular, the assessment aims to determine whether there are adequate FM arrangements to ensure that project funds will be used only for intended purposes and in an economical and efficient way; (b) whether the financial reports of the HSBCP will be prepared in an accurate, timely and reliable manner; (c) whether the project's assets will be safeguarded. The assessment concluded that WWF-Zimbabwe has adequate FM arrangements to satisfy the Bank's minimum requirements under OP/BP 10.02. The overall financial management residual risk rating for the project is low.

10 *Banking and Fund Flow Arrangements.* The WWF-Zimbabwe office will be required to open a designated account (DA) with a commercial bank, acceptable to the World Bank, and maintain it throughout the life of the project. There will need to be at least three signatories to the DA which shall not at any point in time include a government official and for any withdrawal to be valid, at least two of the signatories will need to sign. Based on the approved work plan and withdrawal requests, the World Bank will disburse on a quarterly basis into the DA and WWF-Zimbabwe will spend from this account. The initial disbursement may cover the requirement for two quarters and thereafter at the end of each quarter, the resources needed for the following quarter will be disbursed, if the IFRs basis of disbursement is used. On the other hand, if an SOE method of disbursement is used, then the reimbursements will be the amounts spent and documented out of the earlier amounts disbursed.

11 *Disbursement Arrangements.* The World Bank allows four disbursement methods namely: (a) advance methods as described in the paragraph above; (b) reimbursement method which will mean refund of amounts pre-financed by WWF Zimbabwe, (c) direct payments to a third party who provided services to the project, and (e) special

commitments where letters of credit may be required from financial institutions. The Disbursement Letter indicates that the first three methods will be available to the project.

12. *Accounting and Financial Reporting.* WWF currently uses ACCPAC as their platform for financial management and reporting but they are in the process of migrating to Oracle Fusion. Oracle Fusion is expected to go live in April 2014. The software allows for proper recording of project financial transactions, including the allocation of expenditures in accordance with the respective components, disbursement categories, and sources of funds. The financial management of the project in Harare is under the Finance and Administration Manager who reports to the Country Director. The other finance staff include an accountant and an intern. There are job descriptions for each of the jobs that clearly define duties, responsibilities, and lines of supervision and limits of authority. The project will be required to submit Interim Financial Reports (IFRs) on a quarterly basis. The IFRs will be submitted within 45 days after the end of each quarter to the bank. At the end of each financial year, the project will be required to prepare annual financial statements and submit them to auditors.

13. *Auditing requirements.* The annual financial statements, the IFRs, SOEs, and the accounts of the project shall be audited at the end of each financial year. The audit shall be done by independent auditors acceptable to the bank. The audit shall be done using international auditing standards and terms of reference agreed with the bank. Audit shall be completed and a copy of the audit report together with management letter shall be submitted to the Bank by WWF-Zimbabwe within six months after the end of each financial year.

14. *Field Operations Manual.* The Field Operations Manual lays out financial management arrangements followed by WWF-Zimbabwe. Project-specific measures not adequately included in the FOM are included in the Project Implementation Manual.

Procurement

15. *Fiduciary responsibility.* The WWF-Zimbabwe Office is part of the WWF, an NGO with headquarters in Geneva, Switzerland. It has a regional office based in Nairobi, Kenya. The office in Harare covers Zimbabwe, Zambia, and Malawi. WWF is an established organization with over 50 years of experience in conservation. At a global level, WWF has established policies and guidelines for procurement. WWF has experience in procurement under World Bank and various other bilateral and multilateral agencies. Their procurement policies are delegated to the field offices and documented in a Field Operations Manual (FOM).

16. WWF-Zimbabwe will be responsible for all fiduciary aspects of the project including those of procurement. Accordingly, a procurement capacity assessment of WWF-Zimbabwe was undertaken in accordance with the World Bank's Procurement Risk Management System to assess overall project risk and identify mitigation actions. Measures required to procurement risks were summarized in the Procurement Risk Assessment and Management System.

17 *Procurement capacity assessment of WWF-Zimbabwe and review of their Procurement Policy and Manual.* The FOM has three sections relevant to procurement management and these are: (a) Field Office signatory limits for contracts and expenditures dated November 2009 which limits the amounts that country office can sign to about US$200,000; (ii) Section 3.1 dealing with Purchasing provides for limits and method of procurement for operating purchases. This section requires that purchases below US$500 require two quotations and those above $US500 would require three quotations, and (iii) Section 1.5 – Grants, Consulting and Third Party Contracts which provides policy and procedures for selection of consultants. WWF-Zimbabwe maintains a vendor list from which quotations are solicited. The list is based on presentations made by vendors and past experience with the vendors. The Bank reviewed the relevant sections of the FOM and found them satisfactory although weaknesses noted in the Procurement Policy are indicated in the table below from the summary of the procurement assessment. Project-specific measures not adequately included in the FOM are included in the Project Implementation Manual.

SUMMARY ASSESSMENT OF CAPACITY, RISK AND MITIGATION - ACTION PLAN

Analysis of Procurement Capacity	Issues/Risks	Mitigation Measures
1. Organization	Capacity to procure consultants is weak and set up for community contracting not defined	- Engage a procurement consultant to assist in selection of consultants in year 1 - Prepare a manual to define institutional setup for community contracting
2. Staffing, Professional Experience	Staff do not have experience in Bank Procurement	- Training in World Bank procedures is required for Administration Officer - A consultant will be hired to assist with procurement of consultants
3. Monitoring Control Systems	Vendor list not transparently generated. No audit trail for the use of quotation system	- Need to advertise in the local papers for expressions of interest for the supply of goods in order to build on the vendor list - Thresholds for use of quotations will be agreed at negotiations
4. Capacity to meet Reporting Requirements	Available staff if adequately trained can produce required reports	No major issue
5. Procurement Planning	Need to be adopted and used as a monitoring instrument	- Procurement staff should be trained in the use of a procurement plan as a tool of monitoring and control - A procurement plan for the project prepared and agreed at appraisal

18 *Procurement Post Reviews and Independent Post Reviews.* In addition to providing ongoing implementation support, the World Bank will carry out implementation support missions twice per year. This will include a review of procurement activities to

ensure that procurement plans are regularly monitored and updated and published on the World Bank's external website as required by the disclosure policy.

19 Based on the agency procurement implementation risk assessment, the overall Assessment of Risk was assessed as Moderate. The initial assessment was carried out on March 10, 2011 and updated in June 2013. Based on the assessed risk, the Bank will carry out Procurement Post Reviews or Independent Procurement Reviews on a sample of contracts not subject to prior review. As risk mitigation measures are successfully implemented, the sample size will be reduced proportionately. High Risk (H) entails a sample size of 20 percent, Substantial (S) Risk a sample size of 15 percent, Moderate (M) risk 10 percent, and Low (L) risk 5 percent. Changes in risk will be communicated to WWF-Zimbabwe as outcomes of the procurement post reviews which may also result in revisions of prior review and the use of Competitive Bidding thresholds.

20 Applicable Procurement Guidelines, Procurement and consultants selection methods, limits and Prior Review Thresholds. Procurement of minor works, goods and Non Consulting Services will be carried out using the "*Guidelines: Procurement of Goods, Works and Non-consulting Services under IBRD Loans and IDA Credits and Grants by World Bank Borrowers*" dated January 2011.

21 Selection of consultants will be carried out using the "*Guidelines: Selection and Employment of Consultants under IBRD Loans and IDA Credits and Grants by World Bank Borrowers*" dated January 2011.

22 Specific procedures for procurement of minor works, goods and non-consulting services have been further elaborated in the Field Operations Manual (FOM). The FOM has been reviewed by the bank and found to be satisfactory. Specific suggestions for improvement of the manual have been provided by the Bank to WWF Zimbabwe to address noted areas for improvement as provided in the risk mitigation measures table.

23 The prior review thresholds are summarized in the table below.

Table: Prior review and procurement method thresholds[24]

Expenditure Category	Contract Value (Threshold US$)	Procurement Method	Contracts Subject to Prior Review
Goods and Non Consultant Services	- $[illegible] - [illegible] - $[illegible] - [illegible] - Below Minor Value (to be) - % value	ICB NCB Shopping Direct Contracting Community Procurement - Community Driven Development (CDD) LNGOs	All Contracts As identified in procurement plan None All Contracts None None

[24] See accession table at front of report for the meaning of procurement acronyms not introduced in this table.

Works	[illegible] [illegible] [illegible] All value All values	ICB NCB Shopping Direct Contracting Force account	All contracts As identified in the procurement plan None All Contracts All Contracts
Consultants (firms)	[illegible] (all) [illegible] (Engineering and Contract Management) [illegible] All Values	QCBS, QBS QCBS, FCBS, QBS, LCS, SSS	All contracts As in procurement plan All contracts
Individual Consultants (1 or [illegible] Competitive selection	[illegible] [illegible]	IC IC	All Contracts None
Individual Consultants (1 or [illegible] Single Source Selection	All values	SSS	All contracts

Note: Contracts selected on basis of QCBS may not exceed cost estimate of US$200,000 equivalent per contract. Use of ICB for works is not anticipated for this project

24. *Procurement plans.* With Bank support, WWF-Zimbabwe developed a procurement plan for the first 18 months of implementation; the plan was agreed with the Bank team during negotiations. The procurement plan will be updated annually.

25. Procurement at lower levels (if any) will be included in procurement plans appropriate to those levels, and will on account of relatively small value, generally not be subject to prior review by the World Bank. Instead the World Bank team will review the procedures at these levels and ensure that they are satisfactory and generally in alignment with World Bank policy. To ensure adequate oversight, WWF-Zimbabwe will be required to carry out technical and procurement audits based on Terms of Reference acceptable to the World Bank for a representative sample of these procurements.

26. *Procurement arrangements for Goods, Non-Consulting Services and Works.* In addition to International Competitive Bidding (ICB), the project is expected to use the Procurement Plan specifies the instances under which such methods may be used:

a) National Competitive Bidding;

b) Shopping.

c) Direct Contracting,

d) Procurement under United Nations Agencies, and

e) Community Participation Procedures (for Community-Driven Development, or CDD).

27. *Procurement of goods, works and non-consulting services.* Goods to be procured under the project are likely to include: vehicles, information technology equipment (e.g. computers, servers and printers), and office equipment and furniture. Procurement will be carried out using the World Bank's Standard Bidding Documents for all International Competitive Bidding (ICB) contracts. The procurement unit will consolidate similar goods and procure them centrally using International Competitive Bidding (ICB), or alternatively, such appropriate methods as:

a) National Competitive Bidding (NCB) (subject to the following additional provisions): (i) the Recipient (including its State Procurement Board) shall not be involved in the procurement process, which shall be conducted entirely by the Project Implementing Entity; (ii) foreign firms shall not be precluded from bidding; (iii) bidders shall not be required to register with any professional organization or association as a condition of bidding; and (iv) bracketing or the rejection of bids based on deviation from a cost estimate shall not be allowed.

b) Shopping,

c) Direct Contracting;

d) Procurement under United Nations Agencies;

e) Community Participation Procedures (for Community-Driven Development, CDD), and

f) Force account.

28. *Procurement of works.* Works contracts will be limited to small value works estimated to cost less than US$200,000 per contract, these could be procured under the Shopping procedures based on comparing price quotations obtained from at least three qualified and eligible contractors. The invitations will include bills of quantities and a statement requiring minimum qualifications, evaluation and award procedures. Contracts will be on a lump-sum, fixed price basis.

29. *Consulting services.* Particular methods of procurement for consulting services will include, in addition to Quality and Cost-Based Selection (QCBS):

a) Quality-based selection (QBS);

b) Fixed-budget selection (FBS);

c) Least-cost selection (LCS);

d) Selection based on the consultant's qualifications (CQS)

e) Single-source selection for firms (SSS)

f) Individual Consultants (IC)

g) Single-source selection for IC (SSS)

30. Schedule for consulting services. Selection of consultants for monitoring and evaluation, external verification of results, financial audits, NGO/Community-based Organization services and other consultants will be carried out in accordance with the Bank Consultant Guidelines using methods indicated in 5.3. Prior review will be required for all competitive firm selection above US$200,000 and all single source selections. Any selection which may by exception be subject to prior review by the Bank will be identified in the procurement plan. For individual consultants, the prior review limit will be for contracts estimated at US$100,000 and above (for competitive selection) and for all sole source selection.

31. Note on capacity building, training, and workshops: All training will be based on an agreed training plan that will be prepared by WWF-Zimbabwe and approved by the Bank and will include at least the justification of the training identified and the capacity gap, the intended trainees, the name of the training provider, the date and the eventual cost of training. After the training, the beneficiaries will be requested to submit a brief report indicating what skill have been acquired and how these skills will contribute to enhance his or her performance and contribute to the attainment of the project objective. The training plan will be prepared and submitted once a year and updated as required.

32. *Operating costs*. For this project, the Bank has agreed with WWF-Zimbabwe that the procurement methods for works, goods and non-consulting services as described in the *Procurement Guidelines* do not have to be followed for payments made for operating costs arising from the implementation of the project. Instead, the Bank has assessed during appraisal WWF-Zimbabwe's and the Government's own procurement procedures for these expenditures and agreed that these procedures are adequate for procuring items for operating costs. The operating costs include recurrent costs (excluding purchase of motor vehicles, computers, etc.) and typically include equipment rental and maintenance, vehicle operating costs, maintenance and repair, office rental and maintenance, office materials and supplies, utility costs (including electricity, water, and gas) communications (excluding telephone and internet charges) equipment rent, operation and maintenance and cost of banking services (bank charges), travel cost and transport of the staff associated with project implementation, per diem and travel costs for project staff; reasonable bank charges; allowances and salaries of contractual staff (but excluding the salaries of the Recipient's civil servants). The Project Appraisal Document (PAD) and the Grant Agreement will include a list of the eligible items to be covered under the project. These items will be procured using the participating Government agency's administrative procedures or those of WWF-

Zimbabwe, which have been reviewed and found acceptable to the Bank. Contracts for these items should not be included in the procurement plan

Environmental and Social safeguards

33. The proposed project is considered an environmental category "B" project since the anticipated impacts will be small scale, site-specific, and can be mitigated. There will be no large scale, significant, or irreversible impacts. Overall impacts will be net-positive. The project triggers six safeguard policies: Environmental Assessment (OP 4.01), Natural Habitats (OP 4.04), Forests (OP 4.36), Physical Cultural Resources (OP 4.11), Indigenous Peoples (OP 4.10), and Involuntary Resettlement (OP 4.12).

34. From an environmental standpoint, the main issues include: (a) subproject investments in the HNP and in the forest reserves (such as buildings, track maintenance, fire breaks, etc.) could have minor impacts; (b) water hole management investments if poorly implemented could potentially result in depletion of groundwater resources (the project itself will be supporting development of groundwater management strategies); (c) the community livelihood investments under Component 2 could involve minor impacts, and (d) land degradation subprojects could involve minor impacts.

35. To address potential environmental and social issues under the project, the Recipient has prepared an Environmental and Social Management Framework (ESMF). The ESMF describes the various steps of the environmental and social management and monitoring required by this project – from subproject screening to implementation, monitoring and supervision – along with a clear description of the roles and responsibilities of the various entities involved in the project management of safeguard issues.

36. The ESMF provides steps for screening subprojects, outlines procedures for preparing, reviewing, clearing, disclosing and monitoring subproject-specific Environmental and Social Impact Assessments (ESIAs) or Environmental and Social Management Plans (ESMPs), whichever is applicable, in accordance with the screening process. The ESMF includes cost estimates for the safeguards work and these costs are included in project budgets.

37. With regard to social safeguards, there will be no acquisition of land, or negative impacts on assets, resulting from this project. However, the Involuntary Resettlement Policy has been triggered as the project could result in some restrictions of access to natural resources – minimizing illegal harvesting of natural resources and poaching. A Process Framework (PF) has been prepared which will focus on how the project can include communities in conserving park resources and benefiting from park activities.

38. A small area outside of but adjacent to the southeast corner of the HNP is home to Indigenous Peoples, members of the San people (commonly known as Bushmen). The project will not finance subprojects within the San territory. The Indigenous Peoples Policy, however, has been triggered as some project interventions may have some impacts on the indigenous population, specifically Component 3, Corridor

Sustainability and park management activities under Component 1. It is expected these impacts would be positive. Component 3 activities include mapping of land use patterns within the corridor to enable development of a strategy for better landscape-based management of HSBC resources. This component will also implement a communication strategy for HSBC and outreach activities.

39. Although the location of the San are known, as well as the HSBC boundaries, an Indigenous Peoples Planning Framework (IPPF) was prepared as it is not known which activities will be relevant to the San until project research, studies, designs, and strategies are completed. Once it is determined how to involve communities throughout the corridor area, an Indigenous Peoples Development Plan (IPDP) will be prepared to ensure project interventions will allow the San to participate and benefit from project activities in ways which are culturally appropriate.

40. Institutionally, overall coordination of the project's implementation of applicable national environmental and social laws and regulations and World Bank environmental and social safeguards policies and procedures will be the responsibility of WWF. The implementing agencies, FMA, PWMA, FC, and MoEWC, will each, in accordance with their area of responsibility under the project, be responsible for the implementation of safeguard measures.

41. Reporting on the implementation of environmental and social safeguards provisions will be provided to the Bank as a part of the biannual progress reports. Safeguard compliance will be verified during World Bank project supervision missions, which will include environmental and social safeguard experts.

Public Consultation and Disclosure

42. The preparation of the safeguard documents followed a broad-based and in-depth consultation approach that involved interviews and surveys of relevant project stakeholder groups, including, but not limited to: rural district councils, traditional leaders, CAMPFIRE, private sector, PWMA, FMA, FC, MoEWC, district administrators, Ministry of Lands and Rural Resettlement, Ministry of Women Affairs, Gender and Community Development, Ministry of Youth Development Indigenization and Empowerment, and the Department of Public Works.

43. The consultation approach was based principles of inclusivity, openness, and transparency. The local leadership and community members were consulted through a meeting and an individual questionnaire administered to each of the participants. The Government departments were consulted through a questionnaire that was augmented by follow-up discussions. Newspaper notices were also placed in the local dailies to capture submissions from a wide range of stakeholders.

44. The main issues that stakeholders raised were related to project design, implementation, and monitoring. These and other issues have been accounted for in the ESMP and are reflected in the project design. They included, among others:

- Community participation in wildlife management
- Use of indigenous knowledge systems in wildlife management
- Implementation of deterrent offences for poachers
- Arrangement for grazing land in protected areas
- Joint fire management with community
- Funding of community income generating projects as way to curb poaching
- Youth involvement in conservation
- Involvement of traditional leaders in the HSBC project.
- CAMPFIRE activities should be enhanced as mitigation for HWC
- Involve traditional leaders in the HSBC project.
- Provision of adequate water supply to wildlife as means to avoid their movement out of protected areas
- Direct compensation from PWMA should be considered for losses incurred by community from HWC
- Network with community in anti-poaching strategies

45. Disclosure of the project safeguard documents (ESMF, IPPF, and PF) has taken place in-country. The documents were disclosed on January 21, 2014 on the WWF website and made available in the publicly accessible WWF library. On January 24, 2014 they were also disseminated on the websites of ECA, IC, and CAMPFIRE. They have also been disclosed at the Bank's InfoShop. The review and disclosure procedures applicable to subproject investments are described in the ESMF

Monitoring & Evaluation

46. Project monitoring and evaluation (M&E) will serve to: (a) examine and report on implementation progress as agreed in annual work plans and related budget plans, (b) proactively identify implementation gaps over the course of the project implementation that require corrective actions, and (c) assess and report on achievement of planned outputs, outcomes and impact as per Results Framework established for the project (Annex 1). WWF-Zimbabwe will have the responsibility for the overall M&E system and will additionally need to provide technical assistance and capacity building to government agencies responsible for M&E in their particular sectors. The PIM will include a section with detailed information on the indicators – their meaning, how to collect data, and how to interpret the results.

Annex 4. Operation Risk Assessment Framework (ORAF)

Zimbabwe: Hwange-Sanyati Biological Corridor Project (P124625)

[illegible]						
Stakeholder Risk		**Rating**	**High**			
Risk Description:		Risk Management:				
Stakeholder expectations are high for the project as it has been under preparation for several years. However, because of the limited resources available and the relatively few focus areas for subproject investments, it will not be possible to fulfil the expectations of many local NGOs and community-based groups. Communities also continue with unsustainable practices such as wildlife poaching in many parts of the HSBC. However, the experience of CAMPFIRE has shown that communities can become partners in conservation and lessons learned from this experience will be utilized in addition to awareness building and educational activities. A new Warden has been appointed to an expanded MoU-WL. To ensure interests still exist to involve this project, all parties concerned will work to provide transparent information about the project at the earliest convenience to the new Natural Management counterparts.		WWF as the project executing agency will need to continue to manage expectations. Close consultation with roles and stakeholders will be important to ensure their continuous support. Awareness building and community development activities supported by the project will help address the issue. Members of the Steering Committee will be called upon to address their respective constituencies. The project through participation of communities will identify alternative livelihood activities that will ensure there is buy-in by the communities.				
	Prep:	Status:	Stage:	Recurrent:	Due Date:	Frequency:
	Open	Not Yet Due	Implementation	☑		CONTINUOUS
[illegible]						
Capacity		**Rating**	**High**			
Risk Description:		Risk Management:				
WWF does not have expertise in all of the project focal areas, particularly in sustainable land management in the other two focal areas. WWF has relevant experience in Zimbabwe. The capacity of the various government		The institutional coordination mechanisms, such as the Steering Committee, will be important to allow WWF to complement its expertise with that of specific government agencies and for the government agencies to communicate and collaborate with each other.				
	Prep:	Status:	Stage:	Recurrent:	Due Date:	Frequency:

agencies (PWMA, IL, LMA) will oversight responsibility for different project components and sub-components is however relatively low and represents a risk. The complexity of the institutional arrangements with multiple implementation entities could bring the risk of poor coordination

				Date	
Client	Not Yet Due	Implementation			CONTINUOUS

Risk Management:

The low capacity of various project stakeholders will be directly addressed by substantive capacity-building interventions planned under the project

Resp	Status	Stage	Recurrent	Due Date	Frequency
Client	Not Yet Due	Implementation			CONTINUOUS

Governance

Rating **High**

Risk Description

The complicated multi-institutional governance structure of the project brings risks of lack of coordination or unclear institutional mandates. There are also several cultural/customary governance issues (due to lack of capacity, knowledge, unclear institutional mandates) which the project is not positioned to tackle

Risk Management:

Legal agreements will help to define the role of the Recipient (the Government of Zimbabwe) and of the Project Implementing Entity (WWF-Zimbabwe) and further information on the project governance structure will be included in the Project Implementation Manual. The Project will have a permanent Project Steering Committee. Regular meetings of the Steering Committee will help ensure final guidance, flow and coordination between different stakeholders

Resp	Status	Stage	Recurrent	Due Date	Frequency
Client	Not Yet Due	Implementation			CONTINUOUS

Risk Management:

Project audits will be a powerful tool to regularly ensure that the use of funds is consistent with that which is described in the Project Implementation Manual and various project legal agreements

Resp	Status	Stage	Recurrent	Due Date	Frequency
Client	Not Yet Due	Implementation			Yearly

Design **Rating** **High**

Risk Description:

The inherent part of the project design relates to the land degradation component because of the issues that are related to different soil types, lack of land management models, and inherent complexity of land erosion and gully formation. Generally, the institutional and technical complexity of the project is certainly risky, but is unavoidable in order to design a project consistent with four different funding windows of the GEF.

Social and Environmental

Risk Description:

The project triggers multiple social and environmental safeguard policies. The risks of adverse environmental impacts are low but on the social side it will be important to carefully implement and monitor implementation of the Indigenous Peoples Planning Framework and the Process Framework.

Program and Donor

Risk Description:

Overall risk is moderate due to a lack of recent donor experience coordination in this sector in Zimbabwe. There is a risk that donor interventions is not coordinated and could result in duplication of activities. The risk is minimized however by the simple fact that there are presently relatively few donors or international NGOs active in Zimbabwe in the specific focus areas of the project.

Delivery Monitoring and Sustainability

Risk Description:

Assuming deployment of a good M&E system there will be relatively low risks associated with delivery monitoring. The sustainability of the project outcomes is however fraught with risk due to the uncertainty of longer-

Risk Management:

The project itself will devote resources to the development of new management models and to training and capacity building. International expertise will be sought for some areas, such as land erosion management.

Resp:	Status:	Stage:	Resources:	Due Date:	Frequency:
Client	Not Yet Due	Implementation	✓		CONTINUOUS

Rating: Moderate

Risk Management:

Both the IPPF and the PF have already been developed and have been vetted and disclosed locally. During project implementation, it will be important to monitor compliance with the Frameworks.

Resp:	Status:	Stage:	Resources:	Due Date:	Frequency:
Client	Not Yet Due	Implementation	✓		CONTINUOUS

Rating: Moderate

Risk Management:

The project Steering Committee will help ensure coordination between different donors. The Bank is also a part of an active multi-donor coordination effort and can directly coordinate with donors as needed.

Resp:	Status:	Stage:	Resources:	Due Date:	Frequency:
Bank	Not Yet Due	Implementation	✓		CONTINUOUS

Rating: Moderate

Risk Management:

One expected output of the project will be preparation of bankable projects as a follow-on of this project - that will help to ensure sustainability of key project results. Component 3 indicators include a number of indicators to develop scenario-wide models and approaches which if successful, will be key to sustainability.

[illegible] framing and the infrastructure of developing corridor-wide strategies for such a large swath of the country	Risk	Status	Stage	Responsible	Due Date	Frequency
	Client	Not Yet Due	Implementation	[illegible]		CONTINUOUS
[illegible]						
Overall Implementation Risk:	**Rating**	**High**				

Risk Description

The overall project risk is rated as High due to risk at the country and water levels, to capacity, governance, design, and sustainability

Annex 5: Implementation Support Plan

ZIMBABWE: HWANGE-SANYATI BIOLOGICAL CORRIDOR PROJECT

Strategy and Approach for Implementation Support

1. The World Bank as the implementing agency on behalf of the GEF will provide implementation support to WWF-Zimbabwe and the project partners. As a major international NGO, WWF will also provide implementation support from its own international network.

Implementation Support Plan

2. The following tables provide the World Bank implementation support plan, including the skills mix required.

Time	Focus	Skills Needed	Resource Estimate (US$)	Partner Role
First two 12 months	Project start up, project administration issues, start-up of technical studies	Procurement, disbursements, FM, park management expertise	75,000	WWW will bring in two international level TA to prepare detailed technical start-up TORs
12-60 months	Oversight of project administration and implementation of technical activities, M&E	Parks management, land degradation, forestry, social safeguards	300,000	As above

Skills Needed	Number of Staff Weeks	Number of Trips	Comments
Biodiversity specialist	30 SW	10	Team leader can play this role and also address issues related to corridor development
Land degradation specialist	10 SW	2	Region-based specialists are available
Forestry specialist	5 SW	2	
Social safeguards specialist	5 SW	2	Oversight needed of IPPF and PF
Environmental safeguards specialist	4 SW	1	Oversight of implementation of ESMF
Procurement	10 SW (total over 5 years)	5	Specialist is based in Lusaka
Financial Management	10 SW	8	Specialist is based in Harare
Disbursements	5 SW	8	Specialist are based in Nairobi
Legal counsel	4 SW	0	Support may be needed for interpretation of legal agreements and for amendments, if needed

Annex 6: Economic Analysis

ZIMBABWE: Hwange-Sanyati Biological Corridor Project

A. Development Impact

1. Calculating an economic rate of return in the context of a cost-benefit analysis for this project would not adequately capture the project's value. The project does not lend itself to a quantitative cost-benefit analysis for the following reasons:

   a. The incremental economic benefits of the park management activities are difficult to assess; a baseline of such activities exists, but the quantification of their benefits poses challenges. Research and monitoring, for example, do not have a productive function, and an attribution of their contribution to the overall management of the park is not possible. Moreover, the primary project outcome will be better park protection. The project's incremental contribution to existing ecosystem services and their economic revenue-generating streams is difficult to assess. In addition, several such services – such as biodiversity – do not have a quantifiable productive function.

   b. The economic benefits of significant portions of the project – including capacity building, training, studies, and Component 3 activities – are difficult to quantify.

2. Nevertheless, it is possible to qualitatively outline the project's expected stream of economic benefits. The following sections consider those benefits for each component.

3. Component 1: PA management and community livelihoods:

   a. Improved park management is expected to help safeguard and potentially expand the tourism potential of Hwange National Park, with attendant benefits to be derived from additional tourism income. Attributing increased tourism numbers to improved park management is difficult however, as tourism numbers are sensitive to a range of factors beyond the park's control: the country's political climate, access infrastructure, and economic conditions in other countries.

   b. Improved community livelihoods through wildlife management are expected to reduce the economic losses local communities face due to human-wildlife conflict. Improved community access to the economic benefits of wildlife will be realized through trophy hunting quotas and resultant employment generation and revenues for infrastructure projects. The extent of these income streams will be assessed during the project and cannot be easily estimated at this time. However, CAMPFIRE has demonstrated that, in the twelve districts in which it operates, combined revenues from sport hunting, tourism, the sale of animal products, and other income-generating activities can reach up to US$4.6 million annually.[1]

4. Component 2: Improved forest and land management:

[1] Data from http://www.campfirezimbabwe.org/index.php?option=com_content&view=article&id=50&Itemid=61

a. Improved forest management will lead to improved regulation of ecosystem services such as watershed and soil protection. Improved biodiversity conservation and wildlife habitats can result in increased tourism potential, as well as positive spillover effects for agriculture. A more sustainable stream of commercial non-timber forest products such as honey, mushrooms, edible insects and indigenous fruits provides potential for increased income streams, substitution of existing food products, and improved diets (the project's forest reserves are not commercially producing timber). Attribution to individual forest management activities, however, is not possible, as the activities are manifold and only achieve an impact in the aggregate. Meanwhile the stream of benefits generated depends not only on the success of the project activities, but also on a variety of factors outside of the project's control (including the physical, investment, and political climate). National capacity building on REDD+ will increase Zimbabwe's ability to access carbon finance. There remain however numerous intervening steps between the delivery of capacity building and the actual realization of income streams from carbon finance, and the latter is undoubtedly many years in the future.

b. Land rehabilitation is expected to reduce the maintenance and construction costs of infrastructure (e.g. the Chegutu hospital) and improve attendant continued benefits derived from infrastructure (health services in case of the hospital, eased transportation in case of roads, etc.). An accounting of these benefits will necessarily remain incomplete before the completion of the land management model that will determine the target area's rehabilitation potential and investment needs.

5. Component 3: Corridor sustainability

a. The improved governance and coordination arrangements that will be the outcome of this component's activities will help ensure the stream of revenues that are derived from the HSBC overall, which includes ecosystem services, many of which are intangible or difficult to measure, such as water provisioning, protection against land degradation, biodiversity conservation, etc.

B. Public Sector Rationale

a. Component 1: PA management and community livelihoods:

a. Sub-component 1.1 Improved management of Hwange National Park. Conservation of Zimbabwe's rich biodiversity resources is insufficient in the absence of public investment, a reality that results from a set of market failures. First, there is only limited market value attached to the financial flows that the HSBC generates. Thus, the corridor primarily generates local public goods in the form of ecosystem services. Second, the positive externalities of conservation – the corridor's total ecosystem value – are not priced into the financial streams the HSBC generates. Third, Zimbabwe's tenuous fiscal situation, its investment climate, and the limited public funding which PWMA receives lead to an under-

provision of investment by private entities. And last, the biodiversity in the HSBC constitutes a global public good that the government can only imperfectly safeguard without external assistance. The global public good character of the area stems primarily from its biodiversity (possible future provisioning services, option and nonuse values) and its role in carbon sequestration.

b. The current financing model for the PWMA, which does not receive government transfers but instead manages its national parks by commercializing its operations, illustrates the under provisioning of the public good that is biodiversity conservation. Available resources for national park protection and development for Hwange National Park are about US$10/km², one twentieth of the level in 1980, and one two-hundredth of the benchmark level of a well-financed park such as Kruger National Park in South Africa.

c. Sub-component 1.2: Improved community livelihoods through wildlife management: Given that Hwange National Park is a publicly owned and operated entity, the government bears responsibility for managing the protected area's relationship with local communities and minimizing the negative externalities that result from the park due to human-wildlife conflict. The intervention will also better align incentives for communities to protect the natural resource that the area's wildlife represents, creating a market for the safeguarding of the resource where none exists to date.

7. Component 2: Improved forest and land management

a. Sub-component 2.1: Improved forest management: The target areas are publicly owned gazetted forests, which the government is intent on better managing. This will have positive externalities on private economic activities in the forests. The forests provide ecosystem services, including water provision (effectively a local public good due to the lack of controlled, fee-based access to water in rural Zimbabwe), and carbon storage, a global public good. Improving forest management will also help correct government failure that has resulted in poor management, and will improve government service delivery.

b. Sub-component 2.2: Land rehabilitation: Addressing land degradation in Chireya Ward will address negative externalities associated with individual land use decisions that currently result in further degradation, reducing available farm land and threatening infrastructure. It will also contribute to correcting the government failure that has resulted in a lack of oversight of land management practices that have led to the advanced state of degradation presently encountered.

8. Component 3: Corridor sustainability

a. The activities proposed in this component do not lend themselves to private sector provision. Their completion will create positive externalities for communities through the better management of the HSBC that will result from the activities.

C World Bank Added Value

a The World Bank's value-added arises from four main sources: (i) The World Bank's experience in supporting protected area management spans several decades, and the Bank is able to draw on the lessons it has learned from its work in this domain around the globe. (ii) The World Bank is actively supporting the development of the Kavango-Zambezi Transfrontier Conservation Area, which has provided it with knowledge of the local context. (iii) The World Bank has successfully implemented landscape management projects in countries such as Rwanda, Ethiopia, India, and China, and can draw on its expertise in this area to bring together the various elements required to create the conditions necessary for the successful negotiation of land uses in the HSBC. (iv) Due to its convening power, the World Bank can draw on a rich array of external expertise to inform its support to the project.

Annex 7: Incremental Costs Analysis

ZIMBABWE: HWANGE-SANYATI BIOLOGICAL CORRIDOR PROJECT

Background Context

1. The Hwange-Sanyati Biological Corridor is a globally important biodiversity reservoir (see Annex 8) and also is home to a large human population, particularly dependent on the corridor's natural resources – its biodiversity, forests, and land resources. The HSBC is however under threat from a number of perspectives. The biodiversity of the corridor, particularly in the Hwange National Park, is subject to heavy poaching and there are concerns about the long-term viability of key faunal populations, especially elephants, due to the absence of groundwater management strategies. The forests of the HSBC are suffering from timber poaching, forest fires, animal poaching, and outright conversion to agriculture or other land uses. There are a number of soil types in the HSBC but the principal types are sodic and very vulnerable to erosion and gullying and not well understood with respect to good management.

2. Climate change is already having important impacts on rainfall and precipitation patterns and it is considered likely these impacts will become more severe, bringing an additional layer of complexity to the efforts to manage the HSBC.

3. The particular confluence of issues relating to biodiversity, land degradation, forests, and climate change are at the root of this project's request for funding from the GEF from the four funding windows corresponding to these areas.

Fit with GEF Strategic Priorities

4. The project uses an integrated landscape ecosystems approach in a specific geographic area (Hwange-Sanyati Biological Corridor – HSBC) within Zimbabwe and thus, will be developed as an integrated multi-focal area project combining several GEF strategic focal area objectives. The project is a cross-cutting proposal that is consistent with the GEF Biodiversity (Objectives 1), Climate Change (Objective 5), Land Degradation (Objective 3) and Sustainable Forest Management/REDD (Objective 1). Linkages are detailed in this annex. All focal areas will contribute to increased capacity to manage sustainable land, forest and biodiversity and enhance public awareness about the values of these resources.

5. Under *Biodiversity focal area*: the project supports the conservation and sustainable use of biodiversity by strengthening the management of the Hwange National Park and its buffer area with GEF funding, as well as other national parks within the HSBC with co-financing resources.

6. Under *Land Degradation focal area*: the project will contribute to developing tools for arresting and reversing current trends in land degradation in the Sanyati catchment area (Chireya Ward) and investing in pilot demonstration activities.

7. Under *Climate Change focal area*: the project supports the development of good management practices in land use, land use change, and forestry (LULUCF) in the forest land and wider landscape aiming at promoting forest conservation, and reforestation and sustainable forest management (SFM). It will also strengthen local environmental connections dealing with issues on local climate change issues and will provide capacity building at a national level.

8. Under the *Sustainable Forest Management REDD+ focal area*: the project will support the reduction of pressures on the remaining forests of the HSBC by developing SFM tools and testing and adopting them in pilot areas as well as by implementing better forest management in two target forest reserves. The project will build national capacity in REDD+.

Project approach

Baseline Scenario

Ongoing government programs and existing donor-supported activities

9. The baseline scenario is constituted by a number of initiatives and projects as well as ongoing government programs that are tackling the major environmental issues facing the HSBC, as outlined above. These investments constitute the co-financing for the project. They are a mixture of grant and in-kind contributions. They are presented here as three groups – programs administered through the World Bank, GoZ programs, and other initiatives. The table at the end of this annex indicates with which specific component each co-financing is associated.

10. *Investments through the World Bank*. Two World Bank-funded programs are part of the baseline:

a) A grant from the multi-donor trust fund (MDTF) for Cooperation in International Waters in Africa (CIWA) for US$4 million for which the recipient is the Zambezi Watercourse Commission (ZAMCOM). ZAMCOM is currently moving their Secretariat to Zimbabwe and the grant is expected to become operational in 2014. The PDO for this grant is "to strengthen ZAMCOM's role in promoting cooperative management and development within the Zambezi River Basin through institutional strengthening, improved information sharing and decision support and strategic planning". The main activities to be supported are institutional development of the ZAMCOM Secretariat, development of a Zambezi Water Information Management System, and strengthening strategic planning in the Zambezi River basin. These objectives are highly aligned with those of the HSBC and a close relationship will be maintained between the HSBC project and ZAMCOM.

b) A grant of US$250,000 from the TerrAfrica Leveraging Fund (financed by multiple donors including Norway, France, the Netherlands, and the European Union) which will be earmarked as a Bank-executed trust fund. The funds will be used to support Component 2 on forestry and land management, to bring in international expertise to supplement that of LMA.

11 *GoZ investments*. The Government is investing resources to address the key problems of the HSBC through a number of government organizations, all implementing agencies under the current project. Considered as in-kind resources, the baseline funding includes:

a) Development of the overall vision and strategic plan for the HSBC supported by the Ministry of Environment, Water, and Climate Change (MoEWC) in collaboration with local governments. These investments include those to improve the attractiveness of the region to tourists by provision of basic infrastructure such as roads and incentives for private sector development. In-kind financing of US$4.2 million over 5 years.

b) Development of baseline maps and monitoring systems for land degradation for the project area supported by the Environmental Management Agency (EMA). In addition EMA is investing in soil analyses and studies in conjunction with the University of Zimbabwe looking at the root cause of land degradation. In-kind financing of US$2.885 million over five years.

c) Investments to support the management effectiveness of the national parks within the HSBC by the Parks and Wildlife Management Authority (PWMA), including updating of the management plan and enforcement activities. In-kind financing of US$3.38 million over 5 years.

d) Investments of the Forestry Commission in management of the HSBC forest reserves including fire control, updating and implementation of management plans, control of poaching and maintenance of close relationships with local communities. In-kind financing of US$2.75 million over 5 years.

12. *Other investments*. A final set of baseline co-financing is provided through non-governmental organizations or through the private sector. These include:

a) Grant funding coordinated by the Southern African Development Community (SADC) of US$550,000 in support of KAZA TFCA, but implemented through the Government of Zimbabwe. Some KAZA TFCA projects have already launched (several supported by WWF) while others are expected to be funded and implemented during the period of the HSBC Project. The co-financing of US$550,000 is estimated as the co-financing that will be provided to KAZA TFCA projects during the lifetime of the HSBC and which are specifically supportive of conservation investments in Zimbabwe.

b) CAMPFIRE Association, one of the project partners, has programs in the HSBC which have been under implementation for almost two decades (development of alternative livelihoods, support to community-managed hunting areas, etc.) and which are complementary to the planned investments under the GEF. In-kind co-financing of US$200,000 over 5 years.

c) Safari and lodge operators (private sector). The community-managed hunting areas supported by CAMPFIRE Association function in collaboration with private hunting safari operators. Private sector tourism operators also are critical for bringing in tourists to Hwange National Park and to other national parks in the HSBC. Their substantial

investments are part of the baseline financing which is needed to sustain and develop a healthy ecotourism market in the HSBC. Although difficult to quantify and subject to some future variability that is a function of trends in the global and national tourism industry, their in-kind co-financing is estimated at US$3.45 million over 5 years. Because of the difficulties of predicting at project start-up which companies will invest and because of confidentiality issues, no co-financing letters are being provided for the private sector support. This co-financing will be carefully tracked during project implementation.

d) Finally, the World Wildlife Fund, the executing agency on behalf of the GoZ, itself will bring resources to bear on the key environmental issues facing the HSBC, and which will be complementary to the GEF. These resources include a substantial contribution already made by WWF for the project supporting its preparation over a two-year period when GEF preparation resources were not available. They also include grant funding for which WWF is currently fund-raising or for which they are planning to use their own resources. The total estimated co-financing over the next 5 years is estimated to be US$1.5 million.

GEF Alternative

Project Development Objective, incorporating Global Environmental Objective (GEO):

13. The joint PDO/GEO of the HSBC project is "to develop land use and resource management capacity of managers and communities in the Hwange-Sanyati Biological Corridor (HSBC)"

GEF-financed activities

14. **Component 1: PA management and community livelihoods.** The aim of this component is to improve management of the Hwange National Park and the livelihood of communities involved in stewardship of the natural resources at the buffer area of the HNP. The component will focus primarily on Hwange and Tsholotsho Districts, the only districts in the HSBC that share boundaries with HNP. While the project area encompasses three national parks (Hwange, Chizarira and Matusadona) and Chewe and Chirisa safari areas, the project's main focus will be on HNP's ecosystem as it is a biological reservoir for most of the wildlife found in the corridor.

15. **Component 2: Improved forest and land management.** The aim of this component is to improve forest and land management across the HSBC through investments and by developing tools to address land degradation, land use change, and deforestation.

16. **Component 3: Corridor Sustainability.** Under this component, WWF and the participating governmental institutions will work together to ensure close coordination and synergy between the different components and project activities, to promote better development planning and coordination at the wider landscape level of the HSBC, and to facilitate corridor-level scaling-up of land management and biodiversity conservation tools and initiatives.

Incremental and Additional value added by GEF funding

17 Table 1 (the Incremental Cost Matrix) provides a brief narrative summary of the incremental global benefits to be expected under the GEF Alternative. The GEF investment will specifically add value in terms of the following quantifiable results:

a) 1,465 million ha of protected areas under improved management as a result of the investments in Hwange National Park under Component 1

b) 157,300 ha of forest reserves under improved management as a result of the forest management investments (plans, fire control, poaching control, etc.) in the forest reserves adjacent to HNP

c) A baseline estimate was made that the amount of carbon sequestered in the forest reserves is about 50 tC/ha (see Annex 2 for further details). The final project design does not target an increase in carbon sequestration but aims to maintain existing carbon stocks, an ambitious goal given declining stocks due to timber poaching, encroachments, and poor forest and fire management. The estimated amount of avoided carbon loss in the forest reserves is 2.5 tC/ha, or about 393,000 tC, or 1.141 million tCO2-equivalent. Carbon tracking tools will be developed and used during the project to quantify historical carbon levels and tendencies during the project.

Incremental Cost

18 The baseline cost (Table 1) for activities that are co-financing the HNBC Project is US$22.565 million and the GEF alternative is estimated at US$28.81 million, resulting in an incremental cost assessed by the GEF of US$5.645 million (in the table below, the management costs are not included, resulting in slightly different totals from Table 2).

Table 1: Incremental Cost Matrix

Component	Category	Estimated Expenditures (US$ millions)	Local Benefit	Global Benefit
1. PA management and community livelihoods	Baseline scenario	GoZ: 4.08 Others: 4.14	Sustaining HNP provides economic benefits to local communities, the national government, and to private sector operators. Community livelihood investments of CAMPFIRE Association benefit local communities.	Protecting HNP protects globally important biodiversity, including one of Africa's most important elephant populations.
	GEF alternative	GEF: 1.795 GoZ: 4.08 Others: 4.14	GEF financing for HNP and for community livelihood projects will generate added local benefits, as noted above.	GEF financing will help to ensure long-term sustainability of HNP and thus one of the most important faunal reserves of southern Africa.
	Increment	1.795		
2. Improved forest and land management	Baseline scenario	GoZ: 3.75 Others: 0.55	Investments in forest management and land degradation control benefit	Global benefits derive from the better management of forest reserves

			communities depending on the forest resources and populations living on fragile water sheds of the HNP.	adjacent to and biologically linked to HNP.
	GEF alternative	GEF 3.24 GoZ 5.76 Others 0.55	GEF financing will bring incremental local benefits as noted above, particularly for communities that will benefit from pilot gully control measures	Enhanced protection of the forest resources will result in incremental protection of the globally important biodiversity of the HNP. Improved forest management will help sequester carbon, bringing about a global benefit of reduction in atmospheric carbon dioxide levels.
	Increment	**3.24**		
LC corridor sustainability	Baseline scenario	GoZ 5.195 Others 4.85	Local benefits tend to be somewhat intangible but pertaining KAZA TFCA initiative and a longer-term strategy for HNP, development will bring local benefits.	SAIDI baseline financing for KAZA TFCA initiatives helps sustain biological flows across this multi-country area. Funding from the CIWA MDTF help sustain watershed level planning in the large multi-country area of the Zambezi basin.
	GEF alternative	GEF 0.535 GoZ 5.195 Others 4.85	Incremental local benefits from the GEF financing are minimal.	GEF financing will help further the KAZA TFCA, consolidating global biodiversity benefits as noted above. The development of scale for land and biodiversity management and the preparation of long-term approaches for the HNP will bring benefits extending beyond the boundaries of Zimbabwe.
	Increment	**0.535**		
Total (excludes Project management costs)	**Baseline scenario**	GoZ 13.013 Others 4.85		As noted above
	GEF Alternative	GEF 5.97 GoZ 13.013 Others 4.85		As noted above
	Increment	**5.97**		

Role of Co-financing

Table 2 on the next page provides a breakdown of how the project financing and co-financing is distributed by component.

Table 2: GEF Alternative - Funding sources by components (US$ millions)

Note: GEF windows are Biodiversity (BD), Sustainable Forest Management REDD+ (SFM), Climate Change (CC), and Land Degradation (LD). Private sector in this table refers to participating saban and hedge operators. The more detailed disaggregation of GoZ co-financing appears in table on the next page

Components	GEF BD	GEF SFM	GEF CC	GEF LD	GEF (Total)	SADC	CIWA MDTF	EnvAfrica	GoZ	CASEF FIRE	Private Sector	WWF	Total
1. PA management and community livelihoods	1.595				2.783				4.038	0.2	1.45	0.5	10.023
2. Improved forest and land management		1.2	0.4	1.64	3.24			0.25	5.75			0.3	9.54
3. Corridor sustainability			0.135		0.443	0.55	4.0		3.185			0.1	8.35
4. Project management	0.93	0.6	0.6	0.08	0.273				0.5			0.4	0.875
Total	1.89	1.26	0.775	1.72	5.643	0.55	4.0	0.25	13.215	0.2	1.45	0.8	28.81

Components	MoEWC	KWA	FC	PWMA	Total
1. PA management and community livelihoods	[illegible]			[illegible]	[illegible]
2. Improved forest and land management	[illegible]	[illegible]	[illegible]		[illegible]
3. Corridor sustainability	[illegible]	[illegible]			[illegible]
4. Project management	[illegible]				[illegible]
Total	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]

Annex 8: Biodiversity Context

ZIMBABWE: HWANGE-SANYATI BIOLOGICAL CORRIDOR PROJECT

Kavango-Zambezi Transfrontier Conservation Area (KAZA TFCA)

1 The Hwange-Sanyati Biological Corridor Project area should first be situated within the biological context of the The Kavango-Zambezi Transfrontier Conservation Area (KAZA TFCA) in order to understand its biodiversity importance[*]. The KAZA TFCA is poised to become the world's largest terrestrial conservation area, spanning five southern African countries, Angola, Botswana, Namibia, Zambia and Zimbabwe, in the latter centred around the Caprivi-Chobe-Victoria Falls area (see map at end of this report).

2 The TFCA includes most of the Okavango River Basin, connecting that ecosystem to the Upper Zambezi River Basin. Migrations of a number of megafauna species and rare and endangered species occur within the TFCA making this an area of global biodiversity significance. For example, this area will be critical in Africa for the long term conservation of painted dog (or African wild dog) (*Lycaon pictus*), wattled crane (*Bugeranus carunculatus*), Nile crocodile (*Crocodylus niloticus*), and cheetah (*Acinonyx jubatus*).

3 Floristically, the TFCA has a moderately rich flora with relatively few endemics. Woodlands predominate dissected by grasslands. In the western part of the TFCA desert scrublands begin to appear. The woodlands are subdivided into Miombo woodland (characterized by *Brachystegia* and *Julbernardia*), Kalahari sand woodlands (characterized by *Baikiaea*), mopane woodland and *Acacia* woodland/bushland. Because of anthropic influences (clearing, fires, livestock grazing, etc.), some areas that were originally woodlands are now shrublands or wooded grasslands. Overly dense elephant populations in some areas have reduced the extent of natural woodlands.

4 The KAZA TFCA hosts one of the richest mammalian assemblages in southern Africa. It is home to about 30% of the entire population of African elephants, and is one of the only major areas where elephant numbers are stable or increasing. It has been an area of evolutionary radiation for a number of ungulate (notably lechwe) and other mammal species. Ornithologists have identified 12 Important Bird Areas (IBAs) in the TFCA and it has home to at least 17 bird species of global conservation interest.

5 The goal of the KAZA TFCA is "to sustainably manage the Kavango Zambezi ecosystem, its heritage and cultural resources based on best conservation and tourism models for the socio-economic well-being of the communities and other stakeholders in and around the eco-region through harmonization of policies, strategies and practices."

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[*] Information on the KAZA TFCA is summarized from the Secretariat's web site (www.kavangozambezi.org) and from the detailed prefeasibility studies carried out in 2006 by the Peace Parks Foundation, available on the web site

6. The KAZA TFCA process evolved from previous transboundary initiatives but differs by being owned and led by the five governments and having a clear focus on conservation as the primary form of land use with tourism a provided environmental service.

7. On December 7, 2006 the Ministers responsible for environment, natural resources, wildlife and tourism in the Republics of Angola, Botswana, Namibia, Zambia and Zimbabwe signed a Memorandum of Understanding (MoU) to negotiate and work towards the establishment of the TFCA. The MoU will be repealed when the Treaty to formally establish the KAZA TFCA is signed by these partner countries.

8. The KAZA TFCA is expected to span an area of approximately 290,000^{2}, almost the size of Italy and include no fewer than thirty six (36) formally proclaimed national parks, game reserves, forest reserves, game/wildlife management areas as well as intervening conservation and tourism concessions set aside for consumptive and non-consumptive uses of natural resources.

9. The KAZA TFCA was adopted as a Southern African Development Community (SADC) project in 2006. The SADC Secretariat draws its mandate to facilitate the establishment and development of TFCAs from a number of SADC instruments aimed at promoting regional socio-economic integration including several focused on shared management of biodiversity resources.

Hwange National Park and HSBC

10. The HSBC hosts three national Parks (Hwange, Chizarira and Matusadona) and two safari areas (Chete and Chirisa). The map at the end of this report shows the distribution of the parks in relation to communal land, gazetted forest areas, and privately owned land.

11. The largest and biologically most important park in the HSBC is Hwange National Park (HNP). The park has tremendous biological importance not only nationally, being Zimbabwe's largest park, but globally.

12. Hwange National Park (HNP) has over 100 species of mammals including 19 large herbivores and 8 large carnivores. These include around 5,000 Cape buffalo (*Syncerus caffer*), about 50,000 African elephant (*Loxodonta africana*)[1], giraffe (*Giraffa camelopardalis*), kudu (*Tragelaphus strepsiceros*), zebra (*Equus burchelli*), 400 lion (*Panthera leo*), leopard (*Panthera pardus*), brown hyena (*Hyaena brunnea*), wildebeest (*Connochaetes taurinus*), and a variety of other antelope species. Some of the species such as the rhino, both black (*Diceros bicornis*) with a current population of between 10-15, and the white (*Ceratotherium simum*), as well as the African wild dog (*Lycaon pictus*) with estimated numbers around 70, are endangered. It is also home to rare and endemic animal species such as the Gemsbok (*Oryx gazella*). It has a prolific bird life

[1] Jachmann, Hugh. 2001. Aerial survey: Hwange elephant conservation areas and main sectors. One of the most recent estimates of elephant numbers in Zimbabwe, this report indicates a range from 41,000 to 60,000 of which the vast majority are in HNP. The range in estimates is indicative of the uncertainty of current data.

with over 400 species which include the ostrich and the ground dwelling kori bustard. It is also home to most of the vultures found in the country.

13. There is large variation in the types of vegetation found in HNP from mopane woodland and teak to open grasslands. The centre and western side of the park is covered by a mosaic of dry deciduous *Baikiaea* woodland (the best-developed such woodland in Zimbabwe) and a scrub of *Terminalia* and *Burkea*. The east has some *Brachystegia* woodland and perennial grassland with *Acacia* woodland on the edges. In the north-east there is deciduous mopane woodland and mixed *Combretum-Terminalia* shrubland. There are several large vleis or marshes that are dominated by grassland and drain into the main rivers of the park. Elephants play a key role in modifying vegetation in HNP; they can cause the growth of some trees to become stunted due to the physical effects of their destructive method of grazing.

14. In the forest reserves and other areas of the HSBC, *Acacia* woodland covers a significant portion of the Sikumi Forest and a small portion consists of Miombo and *Baikiaea* woodlands. The Ngamo Forest is mostly composed of *Baikiaea* woodlands. Dominant species include *B. plurijuga* (Zambezi teak), *Guibourtia plurijuga*, *Pterocarpus angolensis* (Mukwa) and *Ekebergia quinquesiamis* (Red mahogany). The ecosystem in the other project areas like Binga consists mainly of *Colophospermum mopane* woodlands on all soil types. Mixed woodlands with key species such as *Acacia acuminata*, *Adansonia digitata*, *Cassia abbreviata*, and *Schlerocarya caffra* are common in this area. Riverine and alluvial woodlands include *Acacia albida*, *Acacia tortilis*, *Acacia nilotica*, *Ziziphus mucronata*, and *Combretum imberbe* among others.

15. The following points summarize the globally important biodiversity features of HNP and the HSBC:

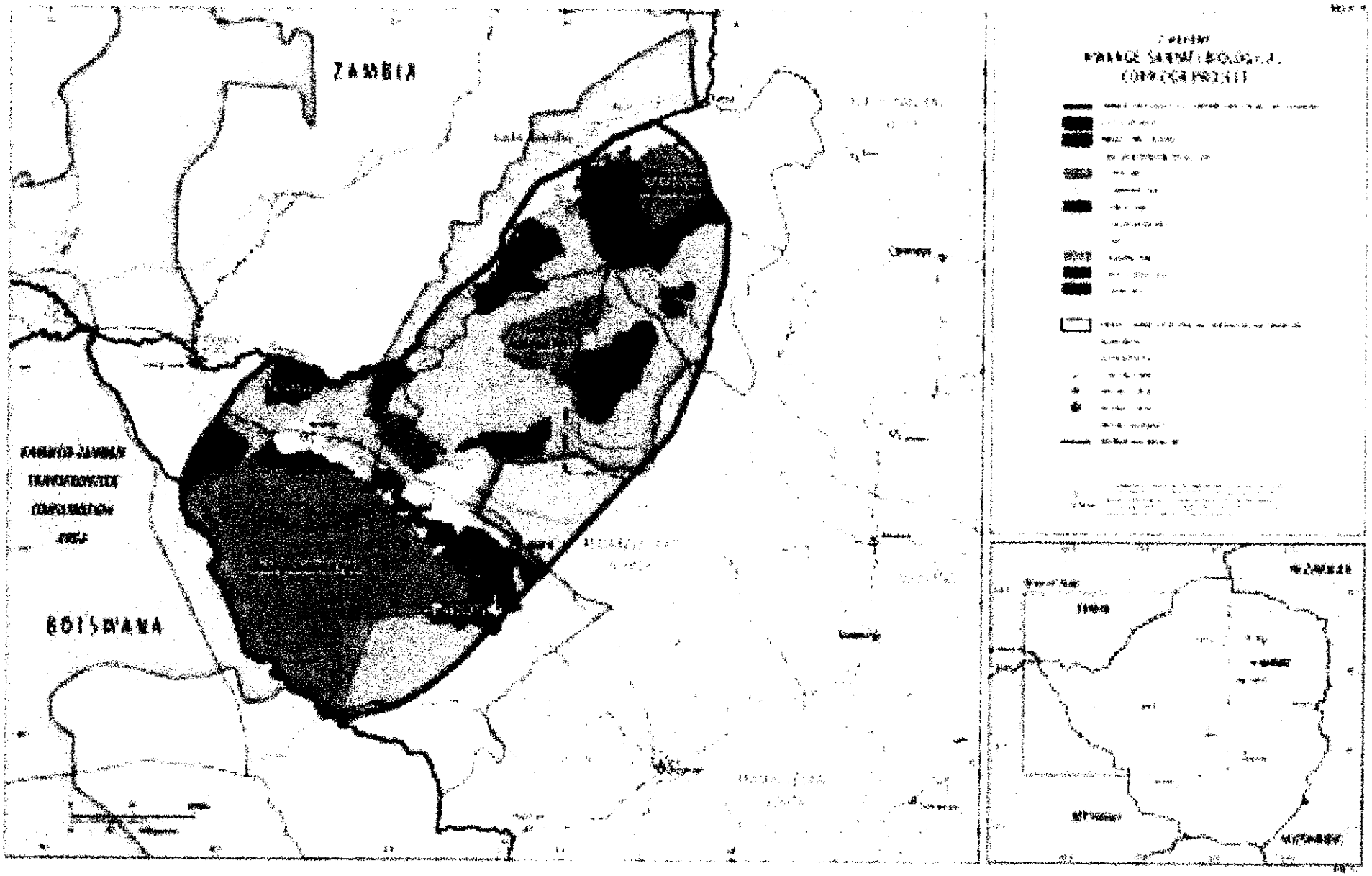
a) It has globally important populations of a number of wildlife species. Although detailed inventories have not been undertaken in more than a decade, it is believed to harbour about 30,000 elephants (roughly 5 to 10% of the global population of African elephants), more than 5,000 buffalo, 10-15 black rhino, and 400 lion.

b) The HNP is the faunal reservoir for the entire HSBC and for nearby areas of the KAZA TFCA. Preliminary information is available on migratory routes of a number of species across the HSBC, including elephants. However, the routes are not well understood and require further research.

c) It is an integral and indispensable part of the KAZA TFCA initiative, as discussed above.

d) HNP is the source of animals that are sport hunted in the other nearby land use systems e.g. Gwaai Intensive Conservation Area; and Tsholotsho, Hwange and Binga communal lands.

e) HNP is home to the Bambusi National Monument, consisting of pre-colonial ruins and rock carvings. The site was declared a National Monument in 1946.


ZAMBIA
BOTSWANA

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

SAFARI CLUB INTERNATIONAL 501 2nd Street NE Washington, DC 20002, Plaintiff, v. SALLY M. R. JEWELL, in her official capacity as Secretary of the U.S. Department of the Interior; U.S. DEPARTMENT OF THE INTERIOR, an agency of the United States; DANIEL ASHE, in his official capacity as Director of the U.S. Fish and Wildlife Service; and U.S. FISH AND WILDLIFE SERVICE, an agency of the United States 1849 C Street, NW Washington, DC 20240, Defendants.	Civ. No. 14-cv-00670(ABJ) DECLARATION OF KENNETH ERIC BUCH

I, Kenneth Eric Buch, being first duly sworn on oath, depose and state as follows:

1. I am a resident of Hanover, Pennsylvania.

2. I am the owner of Kebco LLC, a firearms importer.

3. I first became a member of Safari Club International about 20 years ago. I have been a life member for about 4 years.

4. I am also a member of the National Capital SCI Chapter and the Blue Ridge SCI Chapter.

5. I am also a member of Dallas Safari Club and two local sportsmen clubs. I am a past member of Ducks Unlimited, Rocky Mountain Elk Foundation and National Wild Turkey Federation.

6. I have been hunting for 47 years. I started hunting small game with friends when I was young.

7. I have hunted in a dozen states in the United States, as well as Sweden, France, Australia, New Zealand, Zimbabwe, South Africa, Argentina and Canada.

8. I have hunted for various deer, bear, antelope, buffalo, elephant, bison, goats and wild pigs.

9. I hunted in Zimbabwe in 1989 and 2013 for antelope, buffalo and elephant. I have successfully harvested four elephants.

10. I have seen lots of elephants and signs of elephants in Zimbabwe. The elephants that I observed were very shy of people and would run at the first sight of us. I did not seen signs of elephant poaching in the areas I hunted.

11. When I hunted the elephants, the local people were very happy to receive the meat after a successful harvest. They came from miles around. Most of the locals are subsistence farmers and suffer from elephants raiding their crops. They were all happy that we were hunting elephants. In addition, some of the trophy fees and other expenses for the hunts went directly back to the community for schools, bore holes, etc.

12. In my opinion, elephants are the most interesting animal to hunt. Every other animal pales in comparison. Elephants are potentially dangerous animals that must be taken at a relatively close range.

13. Contrary to what many people believe, elephants are over-populated in most of southern Africa. Many other species are in trouble because elephants are destroying the habitat. I enjoy hunting elephants to benefit the conservation of the species and all other species that rely on their shared habitat.

14. My hunting enhances the survival of the species. I receive the experience of the hunt and the trophy as a symbol of my effort and success. Locals receive desperately needed protein and jobs during the hunts. Money goes back to poor communities and subsistence farmers have some relief from the elephants that raid their crops.

15. The bull elephants that hunters choose to pursue are generally near the end of their natural life. These are not elephants that are major contributors to the propagation of the species, so taking these members of the population has no impact on the general health and well-being of the elephant herd as a whole.

16. The trophy importation bans will result in fewer U.S. hunters and less funding for anti-poaching efforts in Tanzania and Zimbabwe. In addition, fewer people will be in the field to prevent poachers from taking more elephants. If the elephants have no value to the people living with them, the people are not going to be as tolerant of the destruction that the elephants cause. Ultimately, the bans will cause more elephant deaths, not fewer.

17. I have made a financial commitment of $7,000 for a 2015 trophy elephant hunt in Zimbabwe. My ability to import the elephant that I successfully hunt in Zimbabwe is a tremendous component of the hunt that I have planned to take. If I am unable to import my elephant, I do not want to invest the time, energy and funds involved in such a hunt. I have little faith that the U.S. Fish and Wildlife Service will lift the importation ban before my scheduled hunt. Even if the Fish and Wildlife Service commits to reconsider the trophy importation ban, based on what they did in 2014, I do not think I can trust that I will be able to import a trophy from my 2015 hunt. I do not think I can convince my outfitter to return the deposit that I have already paid. I am not sure what to do at this point.

18. I expect that the costs for trophy elephant hunting in South Africa and Namibia will double as a result of the importation bans from Tanzania and Zimbabwe. If they do, hunting in either of those countries will be financially out of reach for me.

19. I submit this declaration in support of Safari Club International's efforts to challenge the U.S. Fish and Wildlife Service's decision to prohibit the importation of sport-hunted elephant trophies from Zimbabwe and Tanzania in 2014.

In accordance with 28 U.S.C. §1746, I declare under penalty of perjury that the foregoing is true and correct.

Dated this 23 day of April, 2014, at Hanover PA.

Kenneth Eric Buch

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

SAFARI CLUB INTERNATIONAL	)	
	)	
Plaintiff,	)	Civ. No. 14-cv-00670(ABJ)
	)	
v.	)	
	)	
SALLY M. R. JEWELL, et al.	)	
	)	
Defendants	)	
	)	

DECLARATION OF RICHARD STUART COOKE

I, Richard Stuart Cooke, being first duly sworn on oath, depose and state as follows:

1. I am a resident of Victoria Falls, Zimbabwe.

2. I am a Professional Hunter.

3. I have been a member of Safari Club International for at least ten years.

4. I have been a member of the Zimbabwe Professional Hunters Association since 1996. I am also a member of SOAZ (for over eight years) and a member of Dallas Safari Club (over 14 years).

5. I actively support wildlife conservation. For example, I have been privately funding some small-scale water development projects in the areas that I hunt.

6. I am 45 years old and have been a Professional Hunter for 19 years.

7. I have guided hunts in Mozambique for eight years in Lipilichi Wilderness, Niassa Province.

8. I have guided hunts in Zimbabwe for 19 years. I guide about 150 days per year.

9. In Zimbabwe I guide on Forestry lands- Ngamo/Sikumi, Amandundamela, Fuller, Kazuma, Pandamasuie; Private lands – Lemlo/Bubye Valley, Rosslyn

Safaris/Lawsten; National Parks lands – Matetsi, Chirisa, Chete,Makuti, Chewore, Dande, Deka, Gengwa RSCH; and Communal lands: Omay north and south.

10. Almost all of my guiding is for elephant and lion hunts. I assist hunters in taking from six to 24 elephant bulls per year.

11. My guiding in elephant range gives me an excellent opportunity to view and assess the status of the elephant populations in my areas. In the Forestry Concessions, the condition of the herds and the elephants themselves is very good. There are many big bulls. In Matetsi, the status of the population is also very good. In the Zambezi Valley, there is an overpopulation of elephants.

12. The local residents who live in elephant ranges live in fear of the elephants and of the damage the elephants do to crops each year.

13. I have viewed evidence of poaching in my areas. I have never seen rifle poaching in Forestry lands in my nine years of guiding there. But in 2013 and 2014, I saw seven carcasses of elephants that had been poisoned.

14. Poaching activity only really happens when hunts are not in progress, because the hunters and their Professional Hunters and others with the hunt make it impossible for the poachers to operate without notice.

15. The U.S. market of hunters drives prices of our elephants up. If the U.S. discourages U.S. hunters from coming to Zimbabwe to hunt elephants, elephants will still be hunted, but at far lower prices. This means less money going back into the system that finances the anti-poaching efforts.

16. The loss of the revenue from U.S. hunters will not benefit elephant conservation. It will just mean less money coming into Zimbabwe communities for pumping water and anti-poaching efforts. More elephants will be poached and elephants will move out of the area due to less pumped water.

17. The importation ban will seriously hurt my business. For 2014, I will have five elephant hunts on my hands that U.S. hunters will not want. For 2015, I have already committed to hunts for 11 bulls and had plans to buy more. The same is true for 2016.

18. I will have to try to sell these hunts to citizens of other countries. I have sold only to the U.S. market for the past 14 years. I believe that the European hunting market is weak, but Russia and especially China are strong, so I will try to sell the hunts there.

19. This year, I will sell the elephant hunts for any small profit I can. As my familiarity with Eastern markets grows, I imagine I'll be selling for better profits, but it is unlikely that I will ever be able to sell for the same prices that I have been able to obtain from the U.S. market.

20. Because the United States cannot control the number of elephants hunted or imported to other countries by non-U.S. hunters, all the importation ban succeeds in doing is decreasing the funding available for elephant conservation. The U.S. is effectively stepping out and is holding the door open for Eastern markets to step in

21. It is difficult enough for us, the Professional Hunters and Safari Operators, who care about the elephants, to impose some measures of control on poaching and elephant conservation, when we have the help of income from U.S. elephant hunters. Without that income, it will be almost impossible to keep the poachers from taking Zimbabwe's elephants.

22. I submit this declaration in support of Safari Club International's efforts to challenge the U.S. Fish and Wildlife Service's decision to prohibit the importation of sport-hunted elephant trophies from Zimbabwe and Tanzania in 2014.

In accordance with 28 U.S.C. §1746, I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Dated this 26TH day of April, 2014, at VICTORIA FALLS, ZIMBABWE

Richard Stuart Cooke

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

SAFARI CLUB INTERNATIONAL	)	
	)	
Plaintiff,	)	Civ. No. 14-cv-00670(ABJ)
	)	
v.	)	
	)	
SALLY M. R. JEWELL, et al.	)	
	)	
Defendants	)	
	)	

DECLARATION OF JAMES STEPHEN RAWSON

I, James Stephen Rawson, being first duly sworn on oath, depose and state as follows:

1. I am a physician and a resident of Columbus, Mississippi.

2. I have been a member of Safari Club International for seven years.

3. I am also a member of Dallas Safari Club and the National Rifle Association of America.

4. I have been a study participant for Quality Deer Management (Mississippi) for the last three years.

5. I am 60 years old and have been hunting for 55 years. I started hunting with my grandfather.

6. I have hunted in Wyoming for elk; Argentina for doves, ducks and red stag; Botswana for elephant and plains game, Zimbabwe for lion and hyena; and Mozambique for cape buffalo, leopard and plains game.

7. I last hunted in Zimbabwe in 2013.

8. I successfully hunted elephants in Botswana in 2012 and 2013.

9. While hunting in Zimbabwe in 2013, I saw many elephants as well as evidence of elephant foraging to excess in some places. We also found one carcass with the ivory missing from a poached elephant.

10. Elephants overpopulate some areas of Zimbabwe. Having been to three "elephant areas" in three years, I have seen the effects of overpopulation on the environment. Hunting helps keep the populations in balance with the habitat.

11. Hunting operations in Zimbabwe are the best weapon against poaching. The game managers, scouts, and rangers all do their utmost to fight poachers and they all follow hunting regulations to the letter.

12. When I hunt elephants, I look for the older bulls and am not interested in the younger males. Hunters remove "post mature" elephants that are not significant contributors to elephant propagation. Poachers are not so selective.

13. When an elephant is legally hunted, every part of it is used. The meat from the elephant goes to the local communities. Nothing is wasted and the locals clean the carcasses. Poachers take the ivory and leave the carcasses in the field to waste.

14. Hunting also helps decrease poaching. Due to the fact that hunters will pay well to hunt an elephant, the elephants have value to the local communities and the locals have reason to protect the animals from poachers.

15. I have a hunt planned for September 2014. I like the area that I have selected for my hunt. The number of older bulls is high and I have become friends with many of the locals in that area.

16. My hunt is booked for September 24-October 19 2014. I have deposited $18,000 towards the hunt, plus around $5,000 in airline tickets. I am entitled to a $10,000 discount for repeat business to apply to my hunt, which I will lose if I cancel the hunt. At this point, I am not sure whether I will receive any refund if I decide to cancel.

17. My ability to import the elephant I successfully hunt is an important part of my hunting experience. If I am unable to import the elephant, the value of the hunt diminishes greatly for me. This is why I may attempt to cancel.

18. Although elephant importation remains open for hunting in other countries, it is likely that the prices for these hunts will escalate due to the increased demand for these hunts. For this reason, rescheduling my hunt for another country is not a viable substitute for my planned Zimbabwe hunt.

19. In addition, rescheduling my trip is not a real option. As a physician, my patient appointments are booked far in advance and it is difficult to make changes to my schedule.

20. Hunting, along with the industry associated with hunting in Africa, are essential for the survival of elephants and big cats. The herds and prides of these animals are healthier because of sustainable hunting.

21. I submit this declaration in support of Safari Club International's efforts to challenge the U.S. Fish and Wildlife Service's decision to prohibit the importation of sport-hunted elephant trophies from Zimbabwe and Tanzania in 2014.

In accordance with 28 U.S.C. §1746, I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Dated this 24th day of April, 2014, at 9:30 a.m.

James Stephen Rawson, MD

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

SAFARI CLUB INTERNATIONAL	)	
	)	
Plaintiff,	)	Civ. No. 14-cv-00670(ABJ)
	)	
v.	)	
	)	
SALLY M. R. JEWELL, et al.	)	
	)	
Defendants	)	
	)	

DECLARATION OF GARY MICHIEL DUCKWORTH

I, Gary Michiel Duckworth, being first duly sworn on oath, depose and state as follows:

1. I am a professional hunter and safari operator with Mokore Safaris in Borrowdale, Harare, Zimbabwe.

2. Mokore Safaris is a member of Safari Club International.

3. The company is also a member of the Safari Operators Association of Zimbabwe, Zimbabwe Pro Hunters and Guides Association, and Mozambique Safari Operators Association.

4. My family and I have been responsible, both financially and physically, for the restoration of the Mokore, Angus and Umkondo sections of the Save Valley Conservancy. We worked to bring it from denuded cattle land to one of the best game areas left in Africa today. We've also successfully restored the Nhacainga Conservancy (Coutadas 9 and 13) in Manica Province, Mozambique from an area with very little game after their civil war into one of the best game areas in Mozambique.

5. My family has been in the safari business my entire life. My father, Barrie Duckworth, has been operating since 1979.

6. We provide hunts in Zimbabwe (Save Valley Conservancy and Sengwa Research Area) and Mozambique (Coutadas 9 and 13). We also sublease in other areas if our quotas are sold old.

7. Currently, we provide 5 bull elephant and 4 tuskless cow elephant hunts each year in Zimbabwe. We provide 3 bull elephant hunts each year in Mozambique.

8. The Save Valley elephant population is in excellent health. In fact, ecologists have advised us to cull 60 elephants per year to maintain numbers they think are manageable.

9. In the Sengwa Research Area, there is a healthy population of elephants. Unfortunately, there has been some fairly heavy poaching in the last 4 to 5 years (about 20 animals per year), but we have been actively combating the poaching since we started hunting there in 2013. We assist the Parks Department there. In 2013, we had three separate contacts with elephant poachers. We recovered a set of ivory tusks the first time. The second time, we recovered a rifle and set of tusks. In the third instance, we recovered two rifles, killed one poacher, wounded and arrested one, and arrested another. This all took place over the second half of last year, once we were established in the area.

10. I have witnessed other poaching incidents as well. Poachers normally kill the elephants late in the evening. They chop out the ivory and then are gone by the time we find the carcass the next morning. Some of the poachers are amateurs, but many have made a profession out of it and have become quite good at it.

11. We spend large amounts of time, money and effort protecting the elephants in our areas. We do so because they are a valuable resource for sport hunters. If they were worth nothing financially, very few people would be willing to spend money to protect them.

12. Non-hunting organizations provide very little support to any conservation in most hunting blocks. It is only through sport hunting that enough financial resources are raised to protect these areas. In some areas, like the Save Valley Conservancy, there has been some assistance from non-hunting organizations, but not nearly enough. In addition, the organizations typically support only endangered species such as rhinos. If rhinos did not exist in the Save Valley Conservancy, I do not think non-hunting organizations would provide funding to protect the species there.

13. In both Zimbabwe and Mozambique, we are working with the locals to keep elephants away from their crops. We try to chase the elephants back to protected areas. If the elephants crop raid, the locals will not tolerate them as much. If we did not do this and the elephants destroyed the crops, the locals would destroy them as often as possible for meat and to protect their crops.

14. Most of our clientele for elephant hunts are U.S. hunters. Without them, we will not be able to market elephant hunts for reasonable prices. This loss of income will seriously deplete our resources and severely impact our anti-poaching and community work. Mokore Safaris spends around $75,000 per year on anti-poaching efforts. Without U.S. hunters, we will lose around $160,000.00 per year in bull elephant hunts alone.

15. We will obviously attempt to sell the elephant hunts to non-U.S. hunters, but at this stage of the season, most will remain unsold. Even beyond this year, I fear that we will not be able to sell the hunts for very much because the European market will be swamped when the U.S. market is gone.

16. The loss of American hunters will also take away employment from professional hunters, staff, and general laborers, again detrimentally impacting the communities. The locals, in turn, will want elephants even less.

17. I believe that the trophy importation bans imposed by the U.S. Fish and Wildlife Service will spell the end of elephants in many hunting areas. No one will spend the huge amounts of money needed to protect the species if they are no longer valuable. We will try as much as we can to protect the elephants in our areas because we love the wildlife we are so fortunate to live and work with, but financial restraints are very real.

18. I submit this declaration in support of Safari Club International's efforts to challenge the U.S. Fish and Wildlife Service's decision to prohibit the importation of sport-hunted elephant trophies from Zimbabwe and Tanzania in 2014.

In accordance with 28 U.S.C. §1746, I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Dated this 26 day of April, 2014, at Mokore Ranch, SVC, Zimbabwe

Gary Michiel Duckworth

Subject: FOIA 2014-00910
From: "Tapia, Brenda" <brenda_tapia@fws.gov>
Date: 5/28/2014 3:19 PM
To: "John J. Jackson, III" <jjw-no2@att.net>

Dear Mr. Jackson,

on Your latest FOIA request, you asked for all supporting document sent by Zimbabwe. Below is a list of the hard copy booklets, please take a look at this list and if you don't have them we can mail it to you instead of scanning all of those booklet. Please let me know what you will like to do since I am trying to complete your latest FOIA request.

ELEPHANT SURVEYS

- **Aerial Survey of Larger Herbivores, Save Valley Conservancy, Zimbabwe, 2013 (electronic copy attached)**
- **Aerial Survey of Elephants and other Large Herbivores in Gonarezhou National Park (Zimbabwe) and surrounding areas: 2013**
- **Aerial Survey of Elephants and Other Large Herbivores in Chewore Safari Area, Zambezi valley: 2010**
- **Aerial Survey of Elephants and Other Large Herbivores in North-West Matebeleland Park, Zimbabwe: 2007**
- **Aerial Survey of Elephants and other Large Herbivores in the Mid-Zambezi Valley, Zimbabwe 2005**
- **Aerial Survey of Elephants and Other Large Herbivores in the Zambezi Heartland (Zimbabwe, Mozambique, and Zambia): 2003**
- **National Summary of Aerial Census Results for Elephant in Zimbabwe: 2001**
- **Aerial Census of Elephants and Other Large Herbivores in the North West Matebeleland, Zimbabwe: 2001**
- **Aerial Census of Elephants and Other Large Herbivores in the Sebungwe Region, Zimbabwe: 2001**

MANAGEMENT PLANS AND MATERIALS

- **CITIES, African Elephant Action Plan, 2010**
- **Rhino and Elephant Security Group of Southern Africa, Terms of Reference, 2000**
- **Wildlife Management Series, District Quota Setting Toolbox, 2000**
- **The Policy and Plan for Elephant Management in Zimbabwe, 1997**
- **Wildlife Management Series, Quota Setting Manual, 1997**

- Elephant Management in Zimbabwe, third edition, 1996
- Elephant Management Plan in Zimbabwe, 1989
- Ivory Management in Zimbabwe
- Guidelines for Managing Communal Lands Wildlife Revenues in Accordance with Policy for Wildlife, Zimbabwe, 1995
- Wildlife Resources Outside the Zimbabwe Parks Estate: A Management Policy Framework
- Zimbabwe's Campfire: Empowering Rural Communities for Conservation and Development, 1996
- Research Plan 1992

HUNTING

- Parks and Wildlife (Payment for Hunting of Animals and Fish) Notice, 2012
- Safari Hunting in Zimbabwe Guide

MANAGEMENT OF OTHER SPECIES

- Zimbabwe Rhino Policy and Management Framework, 2011-2016
- National Conservation Action Plan for Cheetahs and Wild Dogs in Zimbabwe, September, 2012
- Conservation Strategy and Action Plan for the Lion (Panthera Leo) in Zimbabwe, 2006

LEGAL BACKGROUND

- National Environmental Policy and Strategies, 2009
- Wildlife-Based Reform Policy, 2004
- Environmental Management Act, 2002
- Parks and Wildlife Amendment Act, 2001
- Zimbabwe Policy for Wild Life, 2000
- Zimbabwe Policy for Wildlife, 2000
- Forest Act, 1996
- Parks and Wild Life (General) Regulations, 1990
- Parks and Wildlife Act

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DAPU
DANDE ANTI POACHING UNIT

Charlton McCullum Safaris

Conservation through Education

CMSAFARIS.COM

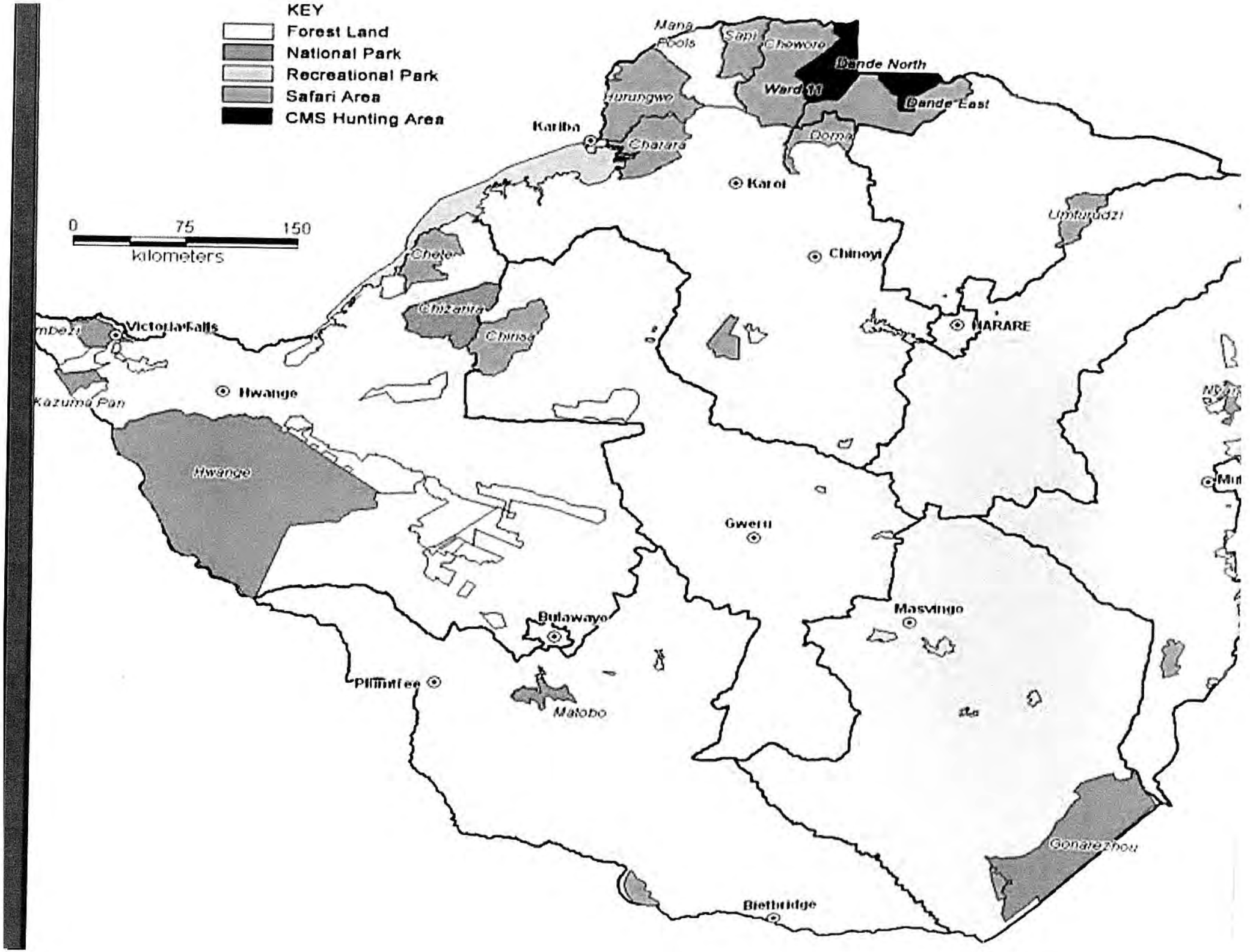
D.A.P.U...Dande Anti Poaching Unit

In 2010 Charlton McCallum Safaris took over the Dande East ('East') and the Dande Safari Area ('DSA') we soon realized that rampant poaching was something that needed to be dealt with much more effectively. The National Parks staff in the DSA were doing a decent job. However the community scouts in the East, with no incentives and seldom getting paid were an ineffective unit.

The East was considered a depleted area, only good for early season crop raiding elephant bulls from Mozambique. The primary reason for this was that the previous hunting operator only hunted the early season for elephant. Then pulling out for the rest of the year leaving it wide open to uncontrolled poaching.

In 2009 CMS enlisted the help of Dr. Russell Taylor to carry out a 'capacity study' in the East. His theoretical results were amazing and he estimated that the area could safely hold 1000 buffalo, 500 kudu, 500 sable etc.

With this in mind as soon as our contract started in 2010, we immediately formed the DANDE ANTI POACHING UNIT (DAPU). To date our full time teams in the East have picked up over 5000 snares and have arrested over 60 poachers (in five years). The game has rebounded strongly which is extremely gratifying. In 2013 we took over Dande North ('North') once again unifying it with the DSA and discovered the same sad story existed with the North. As of 2014 DAPU now supports both the East and North community scouts. This book has been made to support the few who fight for a noble cause, both on the ground and in far away lands...


KEY
Forest Land
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Chete
Chizarira
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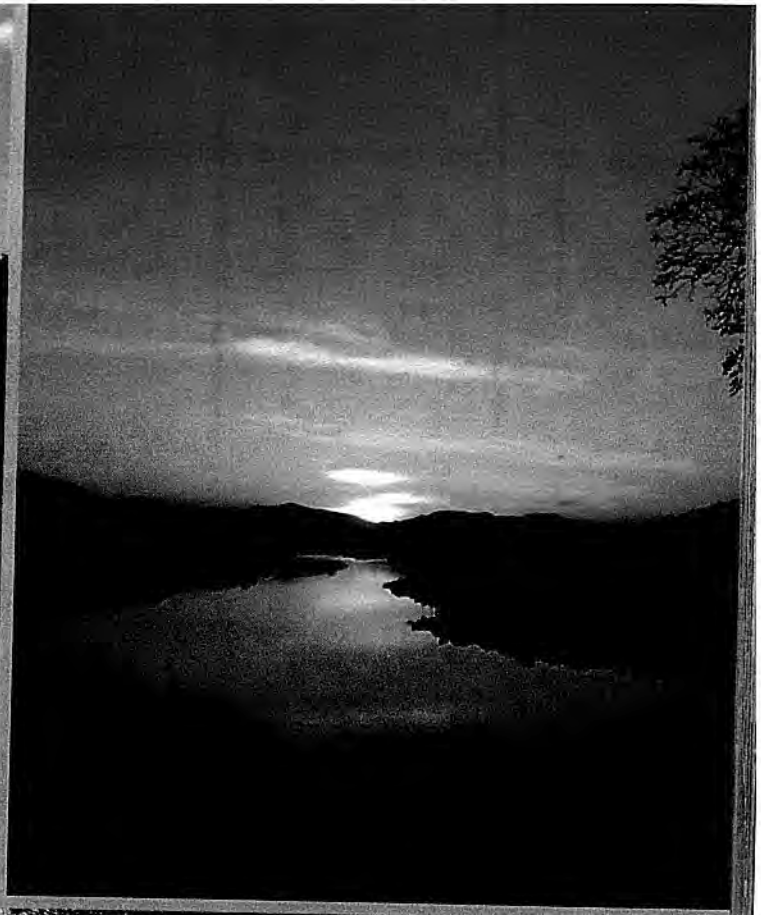
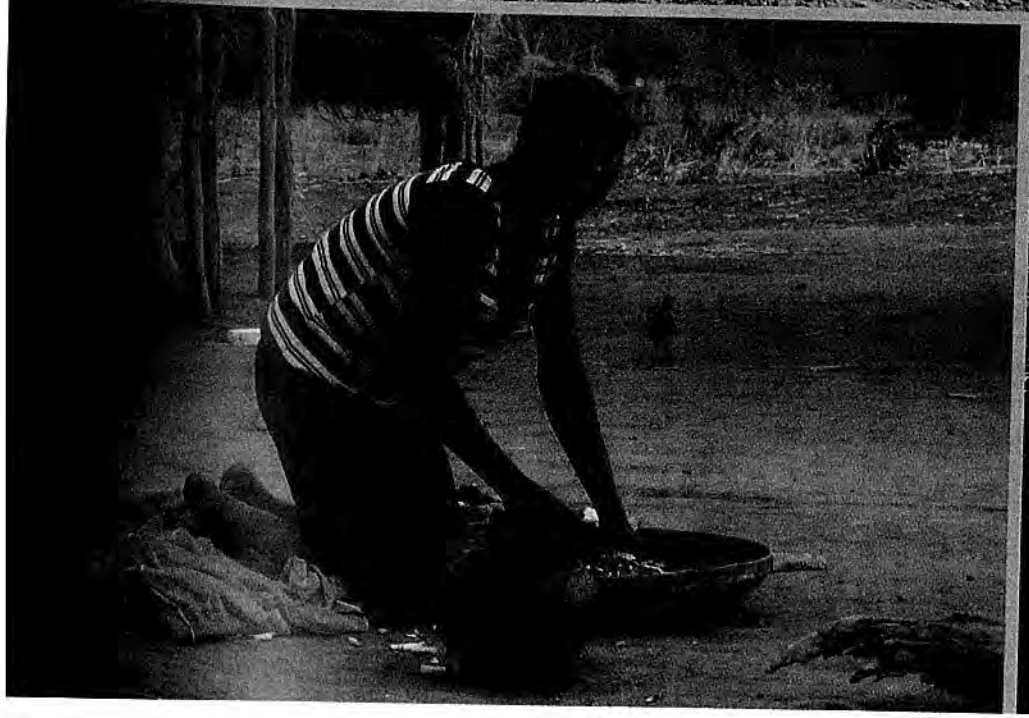
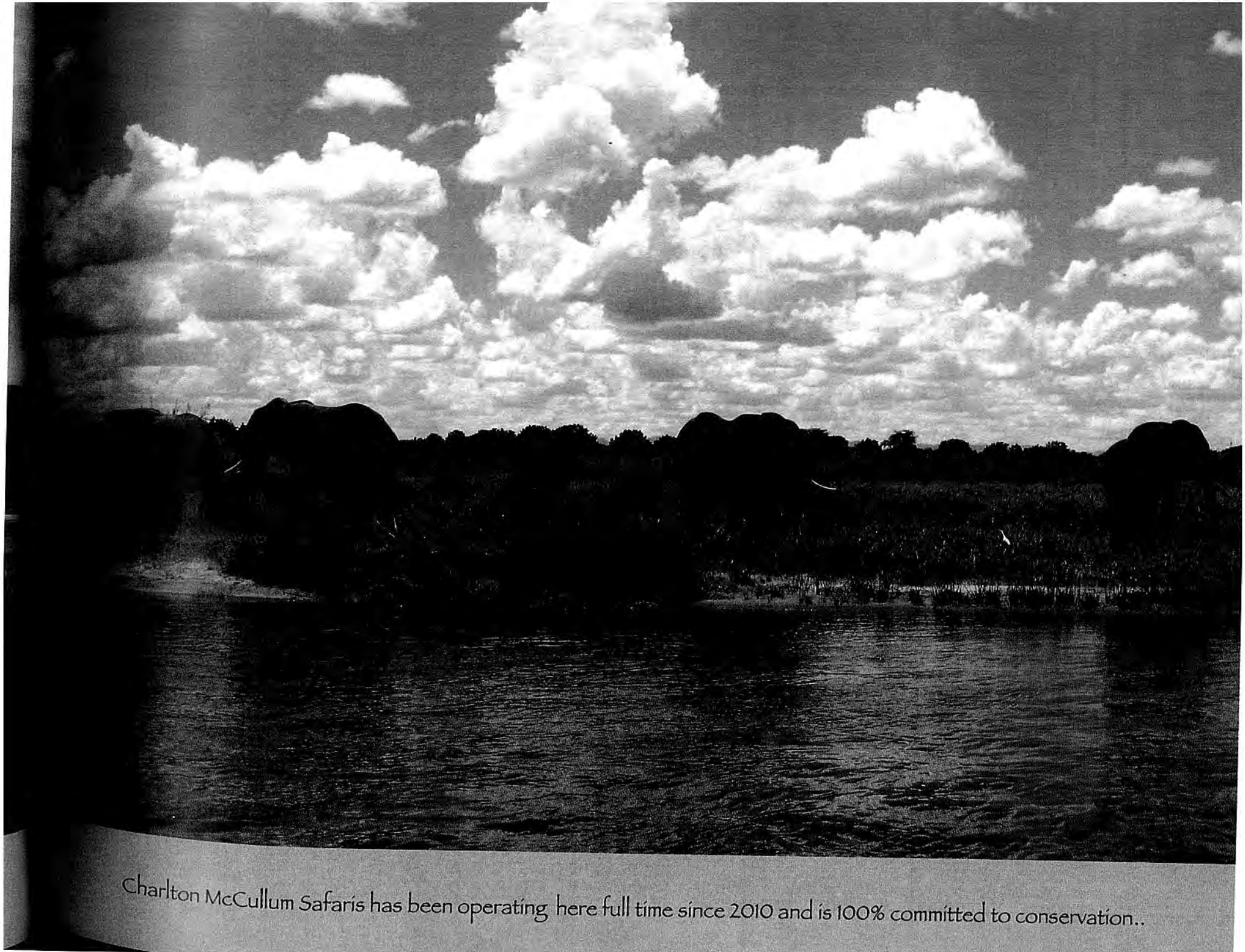
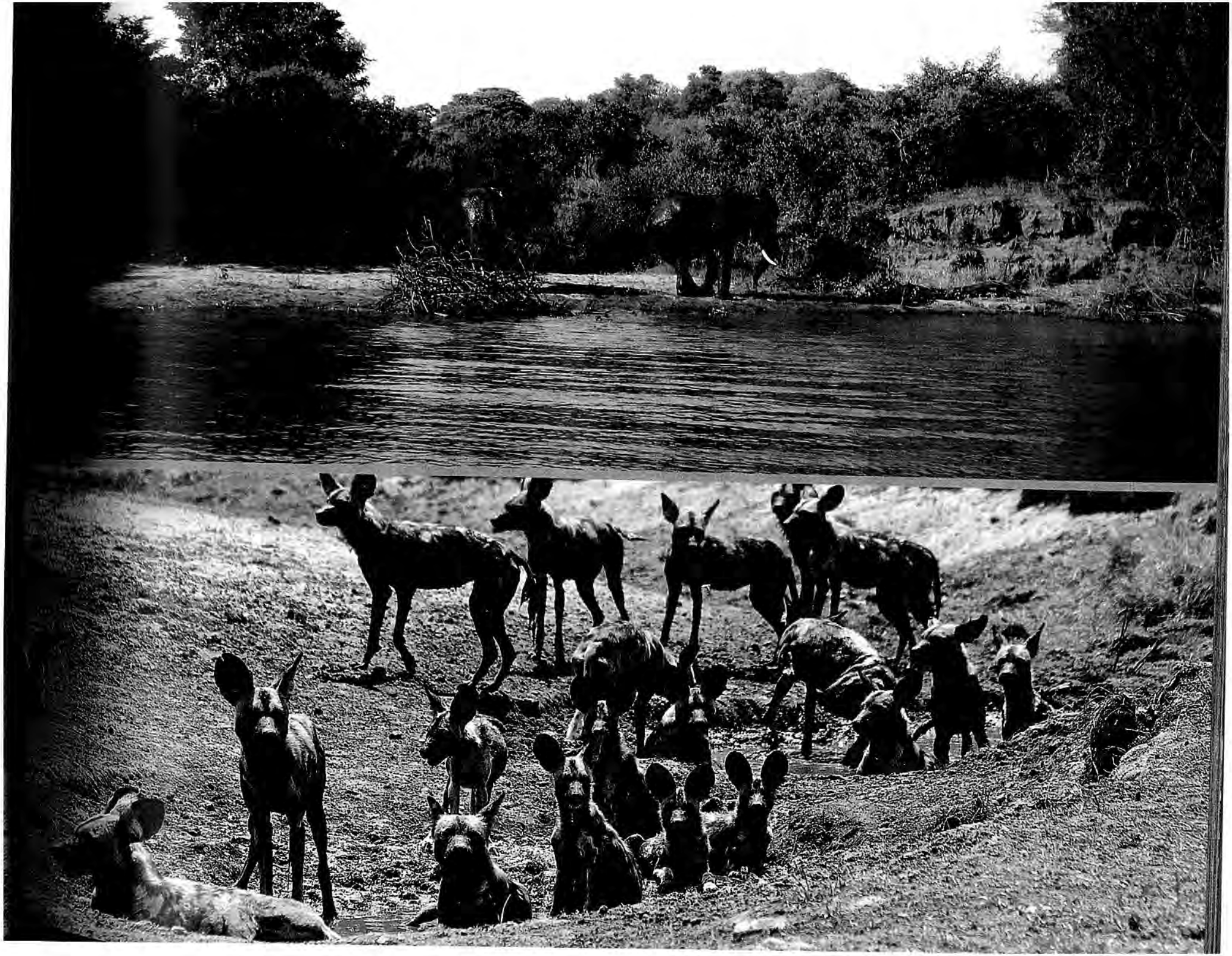


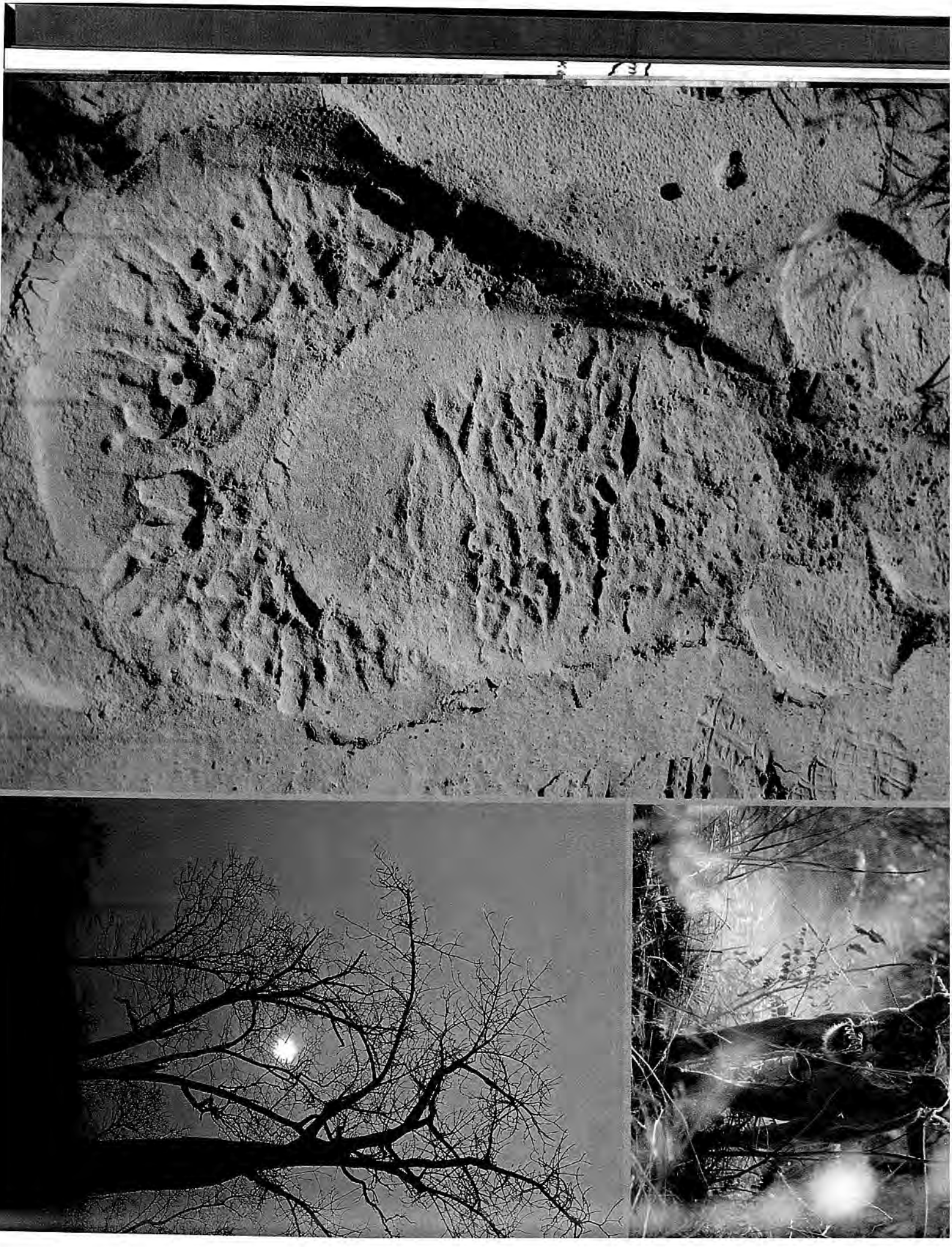


The Zambezi Valley is a diverse ecosystem that is home to many species of animals like Elephant , Buffalo, Lion, Leopard and Hippo!



Charlton McCullum Safaris has been operating here full time since 2010 and is 100% committed to conservation..





A ONCE DEPLETED AREA!

It soon became apparent that the poaching was out of control in the East, not even the birds were safe!
D.A.P.U began huge efforts to control the problem and not long after the game began to return. Buffalo, Roan antelope, Kudu, Impala, Warthog and other species slowly started to return.
Pretty soon the decision was made to try re-introduce other species of game back into the area...

Raised poachers camp

Snared water point

Pit fall trap

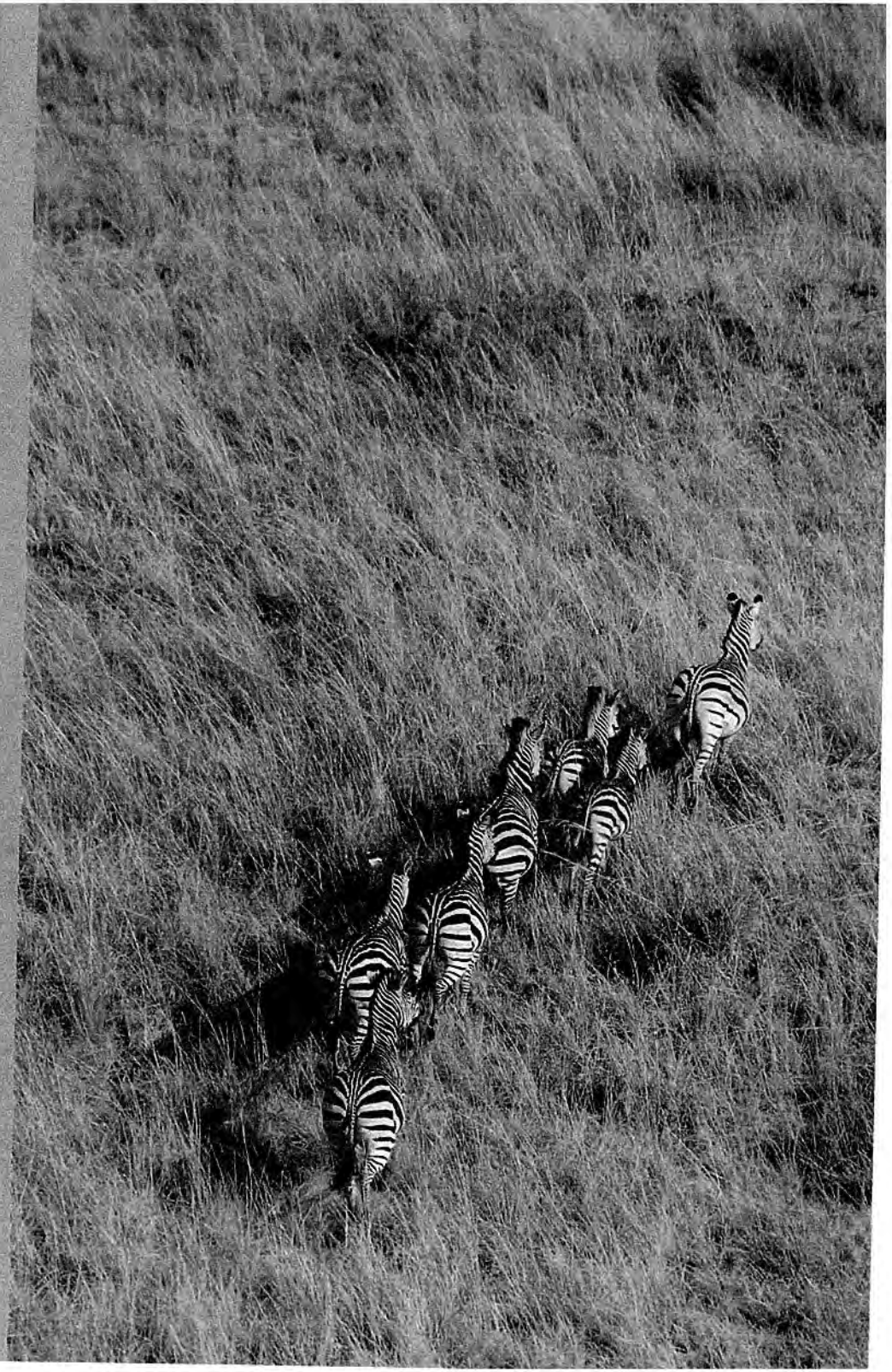
Barricading of game trails forces game into snares

Buzz's daughter Zoe with a collection of snares from the East, a fraction of what has been l

TRANSLOCATION

2014 Charlton McCullum Safaris started to
ck game back into the East section of
nde, it all began with a family group of
bra.

h continued Anti-poaching patrols the
a is now safe for these beautiful animals
oam freely.. the hope is that it is the start
continued re-stocking of game into the
tern section of the Dande area!



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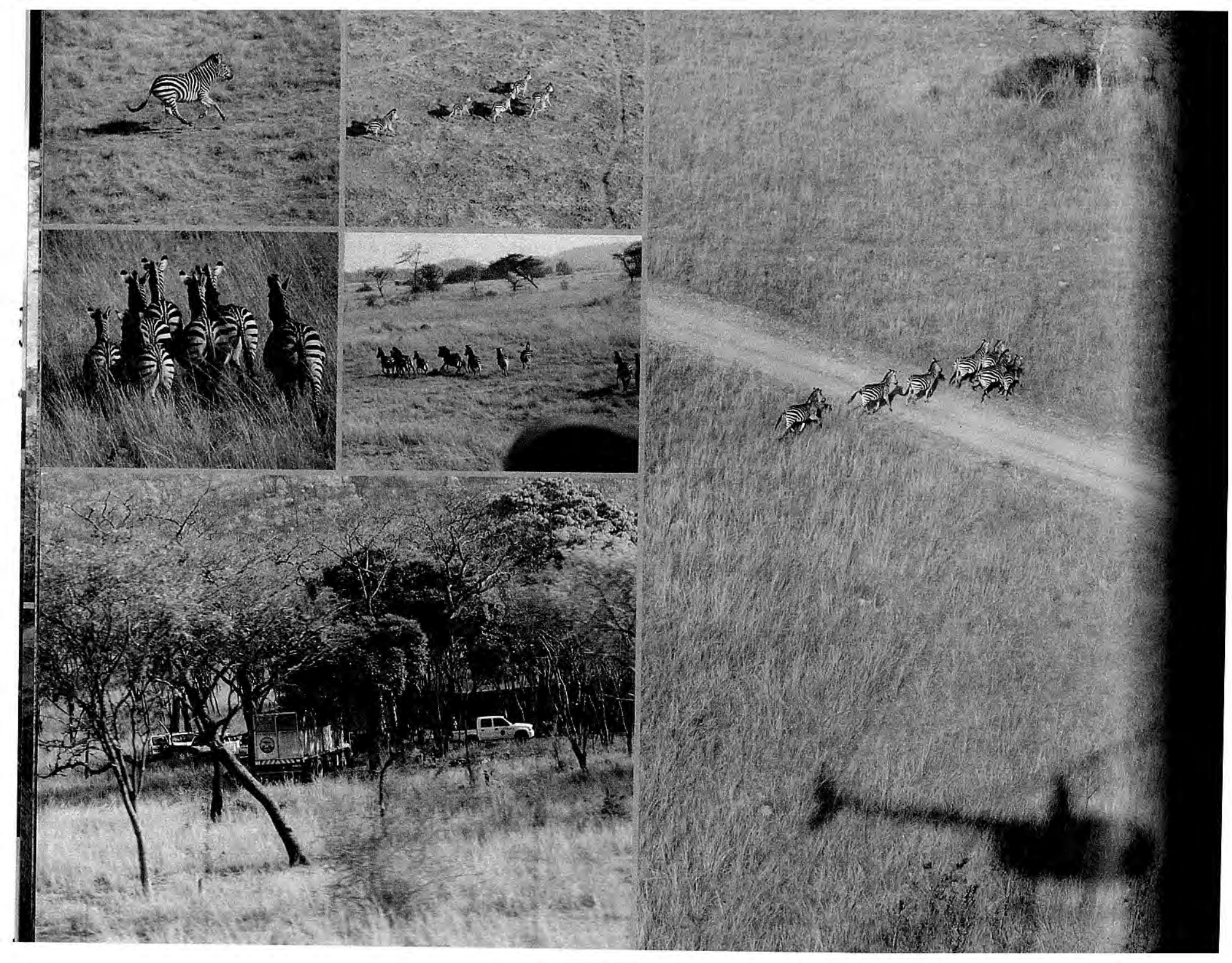
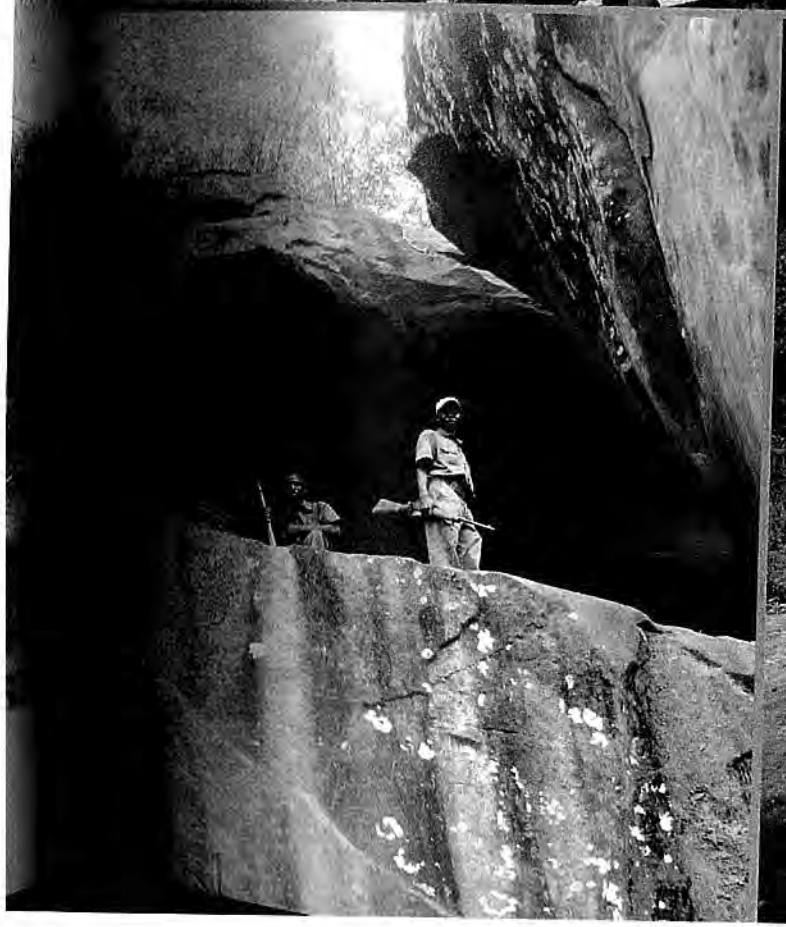
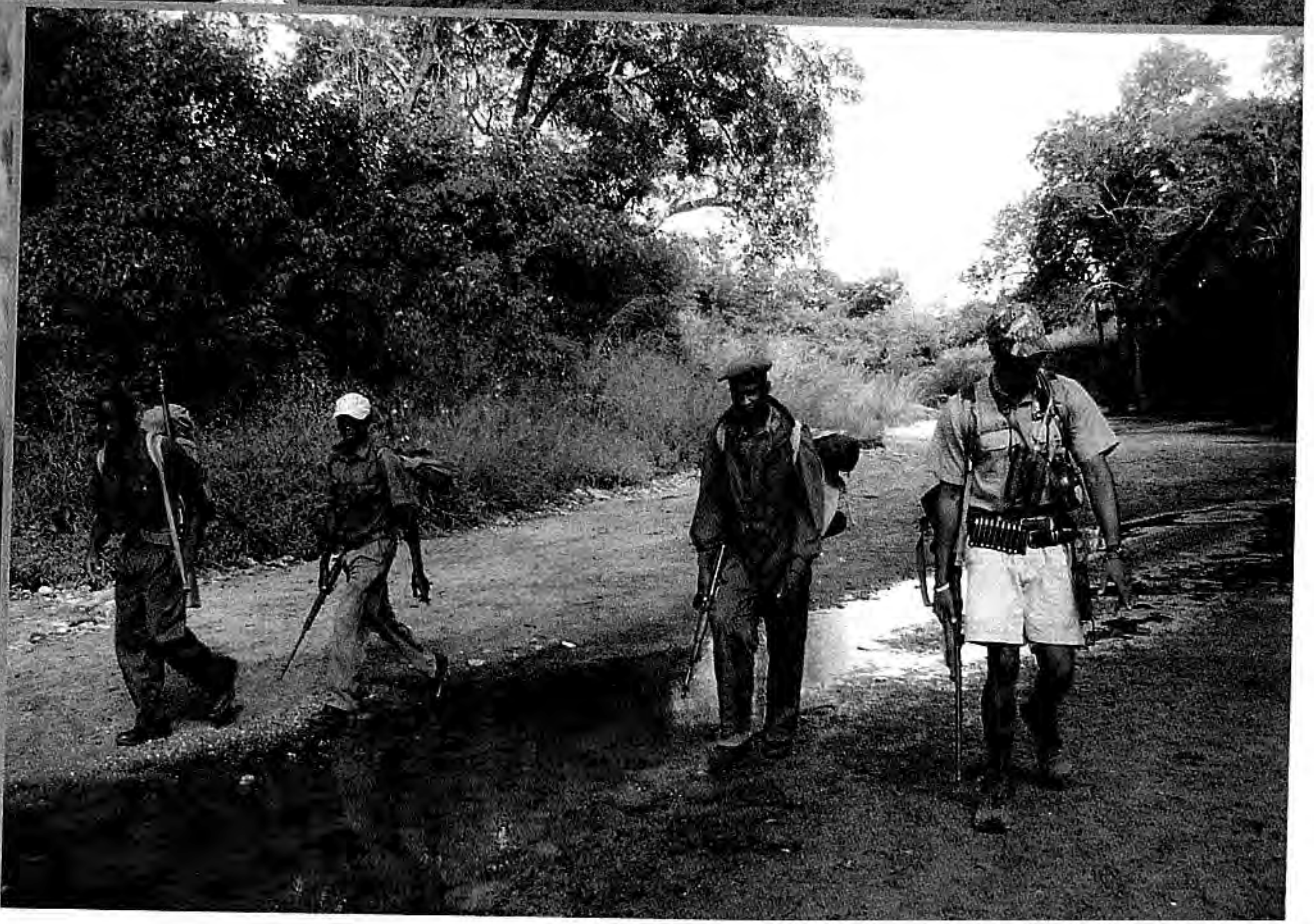
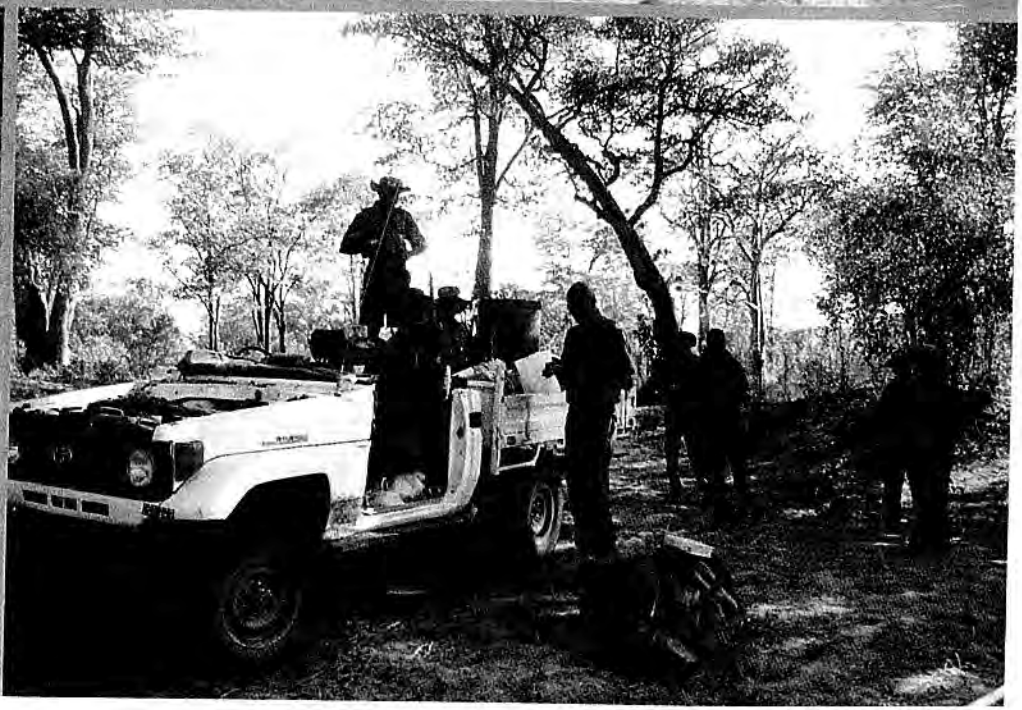


Siraj Gardener and a DAPU unit ready for deployment...

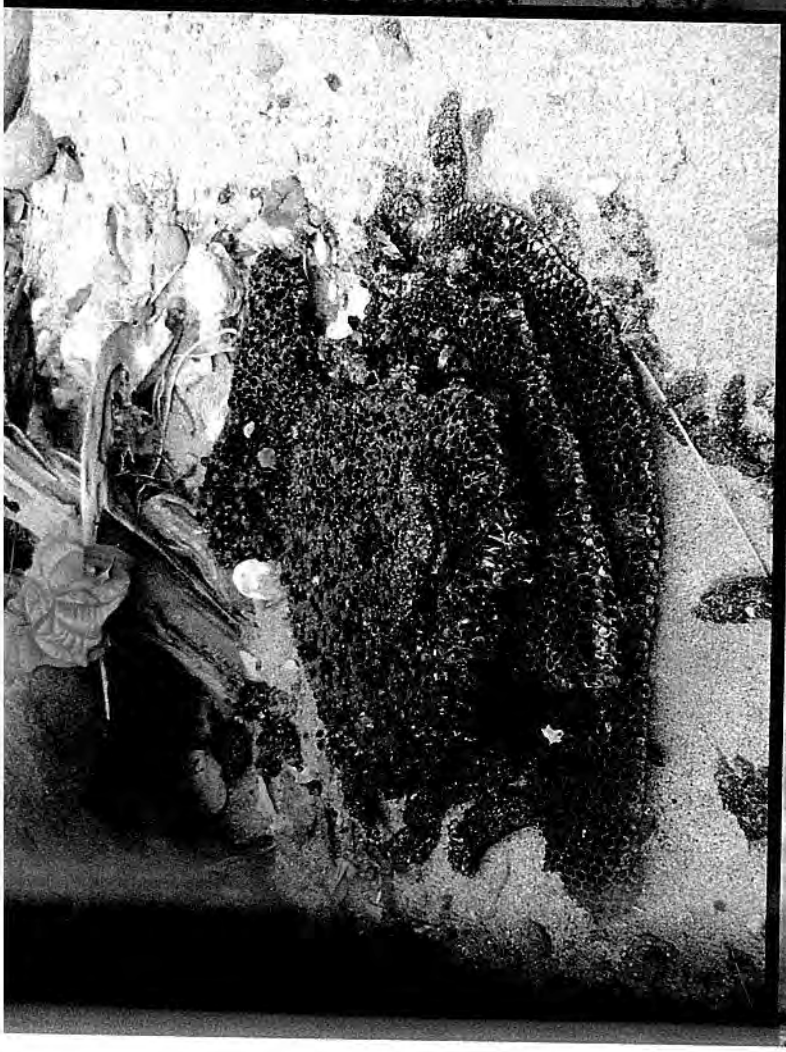






HONEY & FISH POACHING

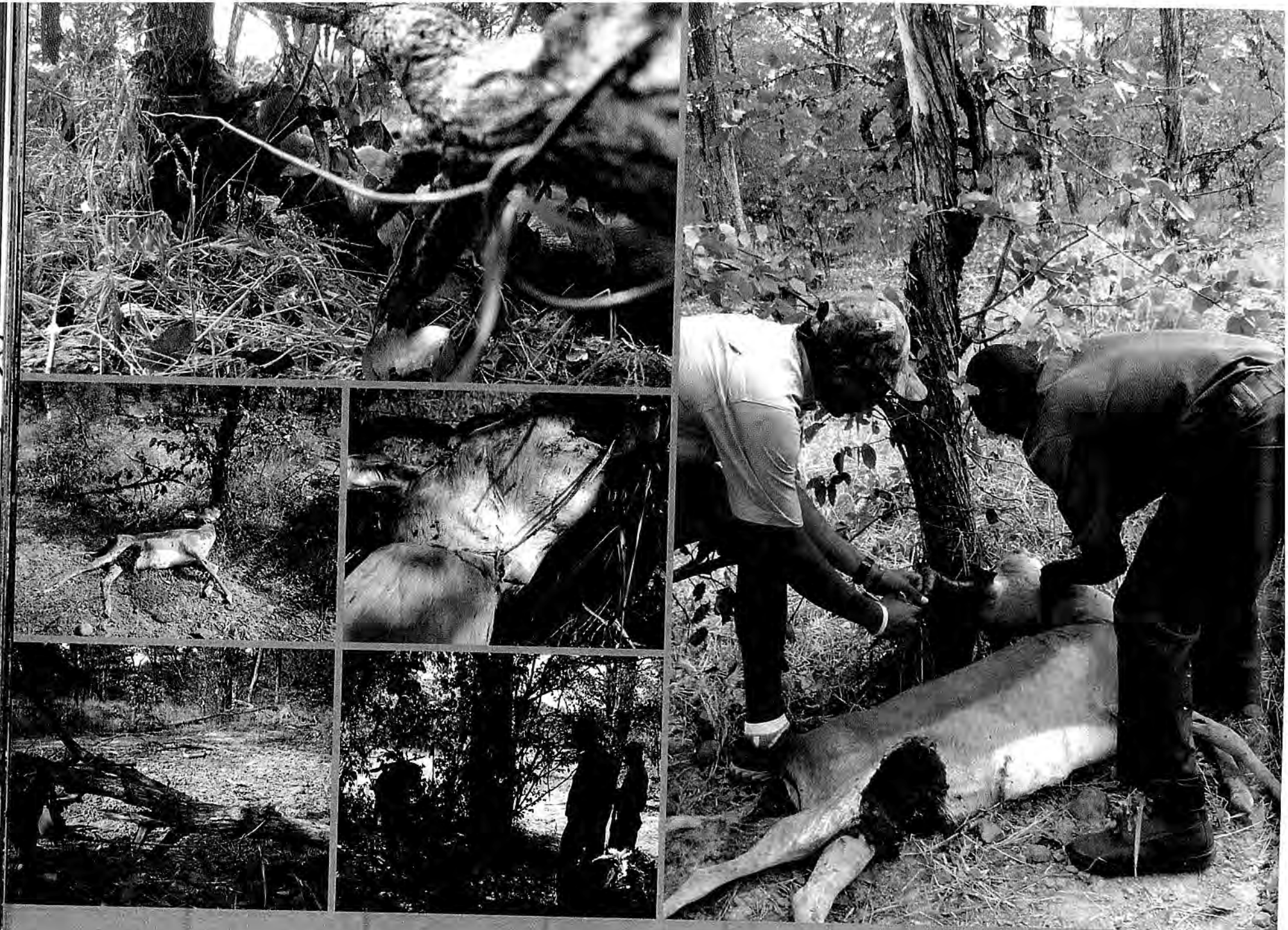
The collecting of honey and fish is the most common form of poaching in the Dande Area! Unfortunately it can lead to deforestation, poisoning of water sources, severe bush fires and also leads to meat and ivory poaching...



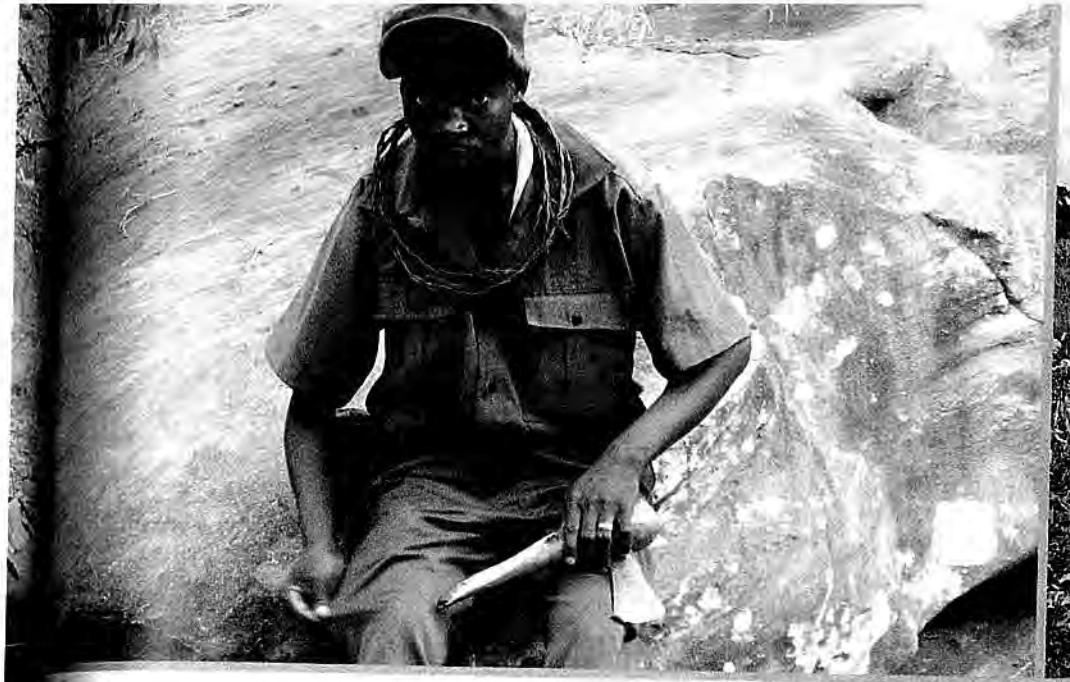
Poisonous plant matter used to kill fish..

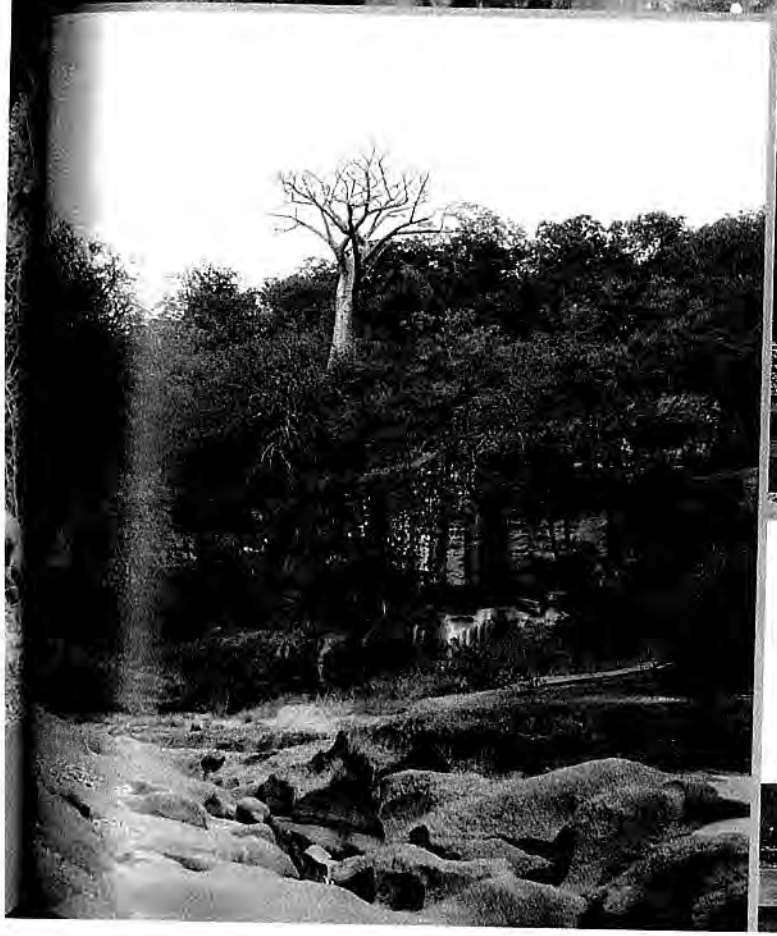
Drying rack for fish and meat..

The Wire Snare is a simple but effective way of killing game, unfortunately it is cheap and easy to come by and will keep killing until it has been removed..



When an animal gets caught in a snare it panics and tangles itself around the vegetation, death is not quick!



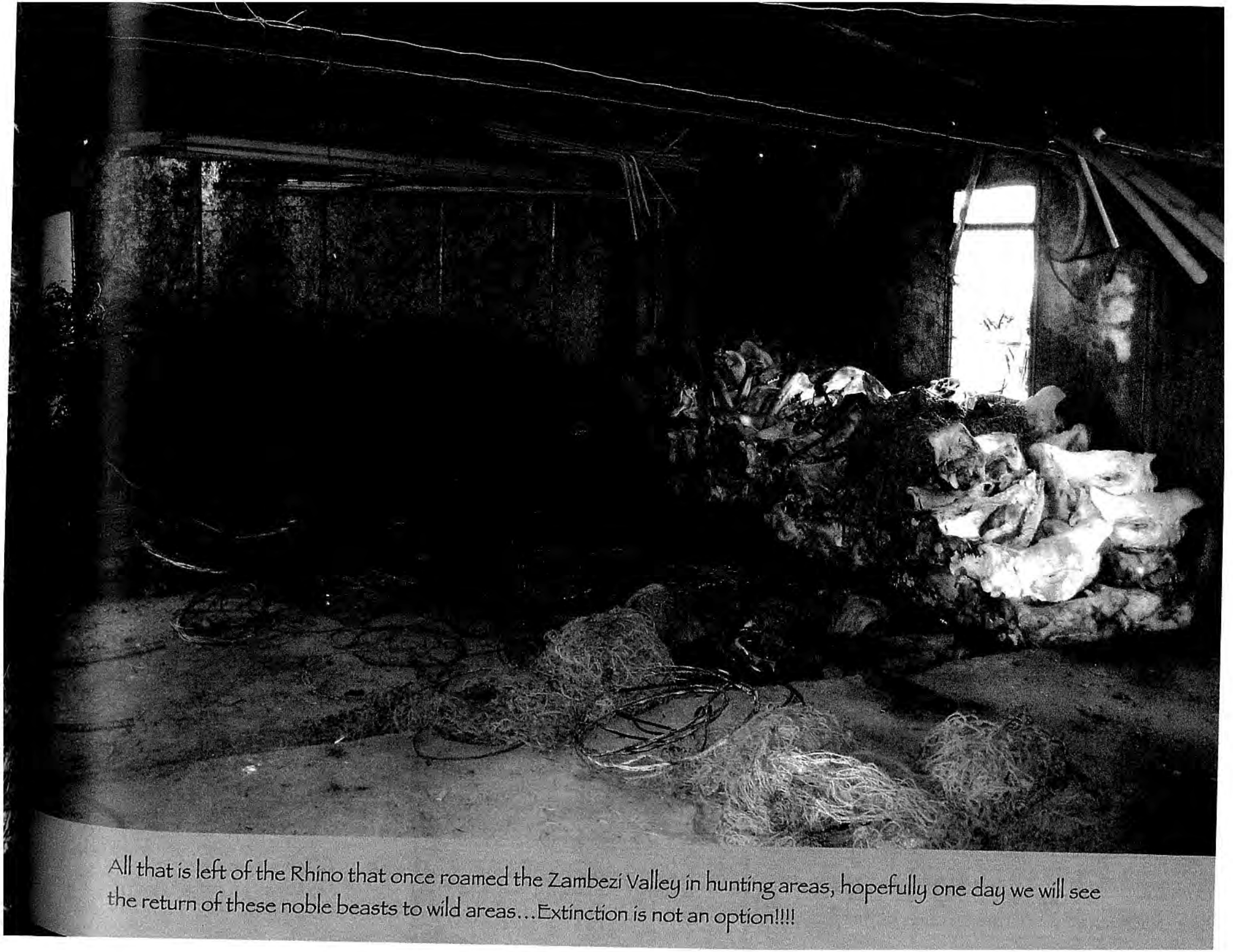


Captured Poacher awaiting charge at police station

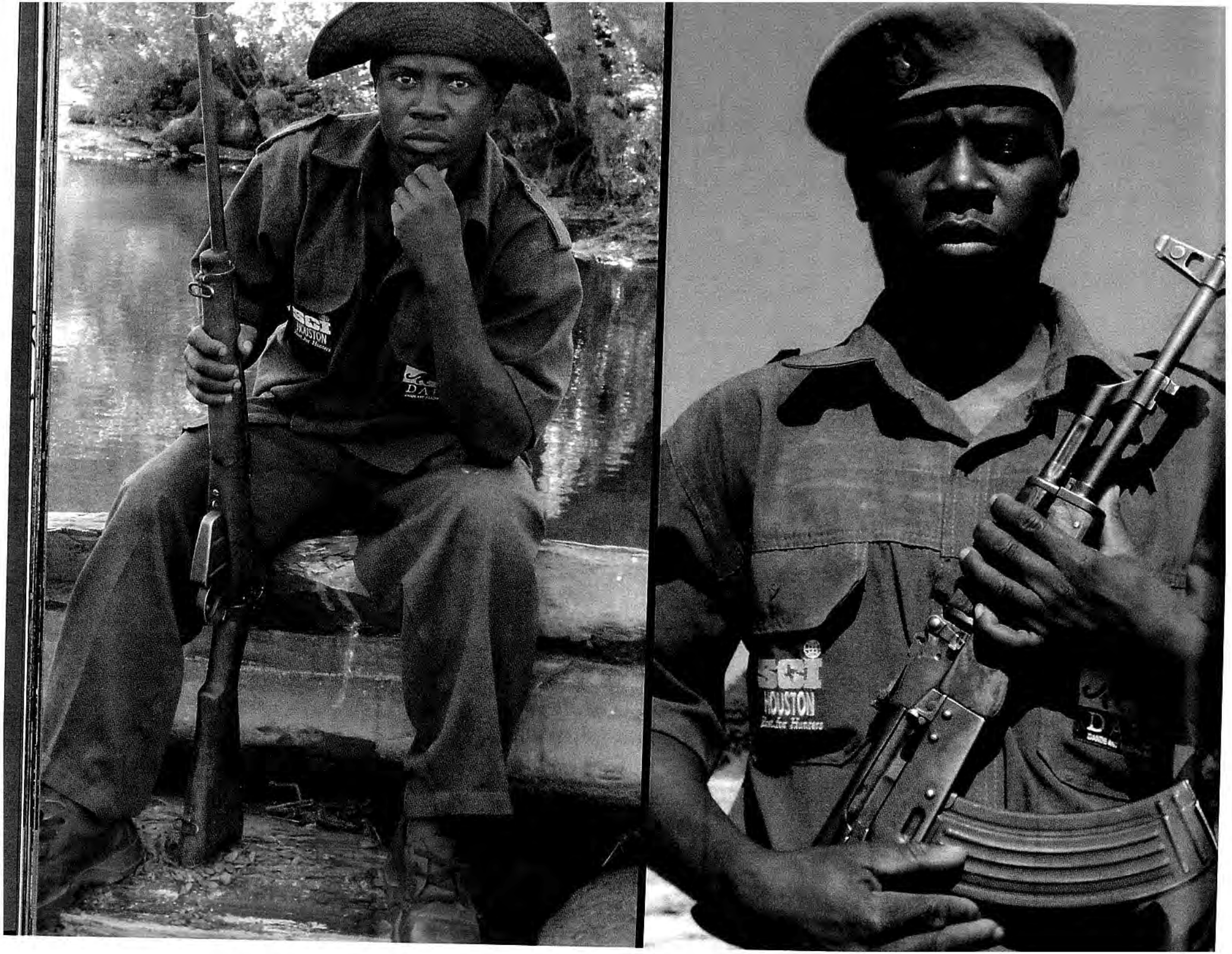
CONTACT

Elephant poaching is the scourge of African wildlife and continues on a vast scale...

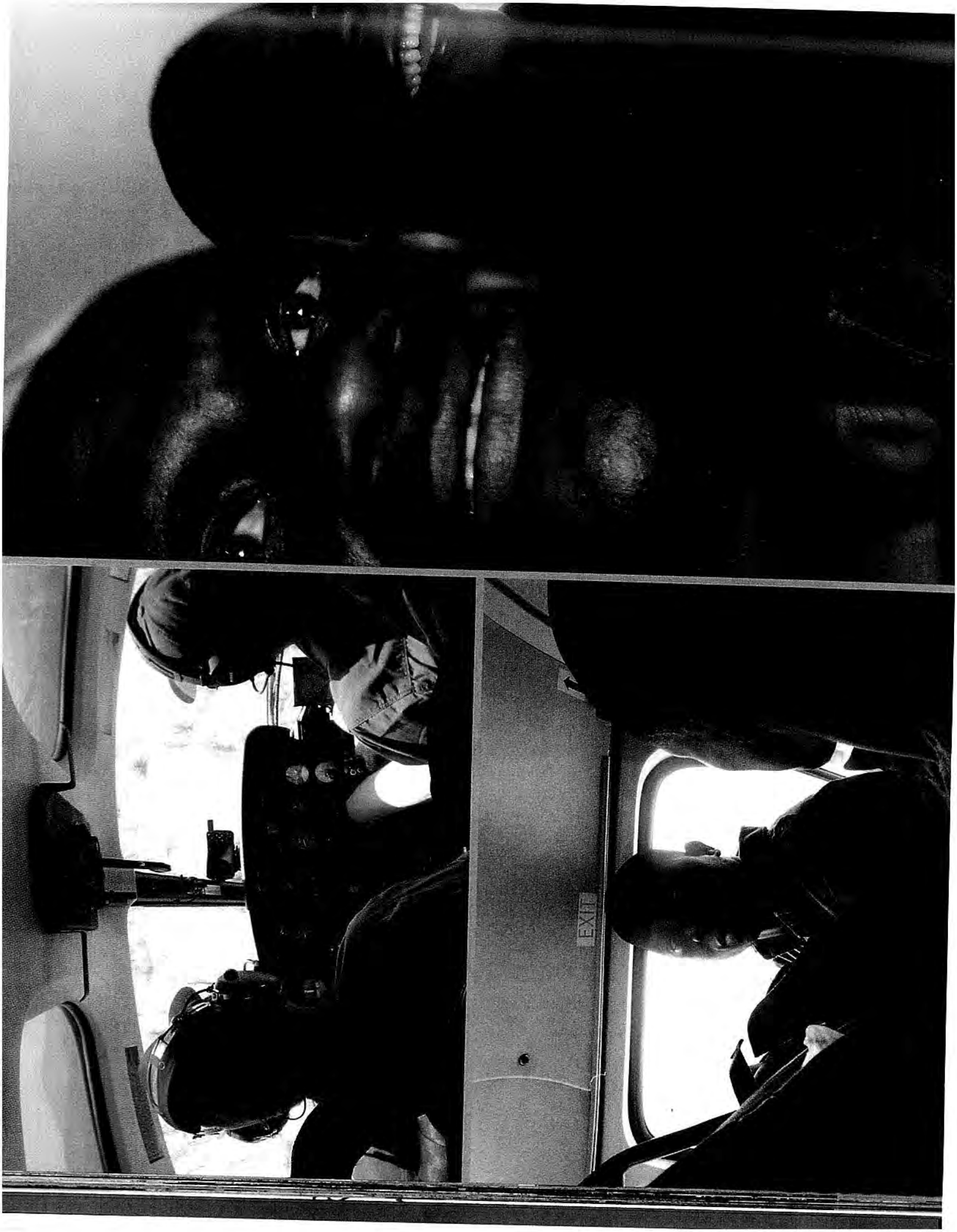
Charlton McCullum Safaris and D.A.P.U continue to fight elephant poaching with huge anti-poaching activities throughout the Dande Safari Area.. In co-operation with the National Parks and Wildlife Management Authority, Council Rangers and the Zimbabwe Republic Police we continue to fight against the illegal wildlife trade...

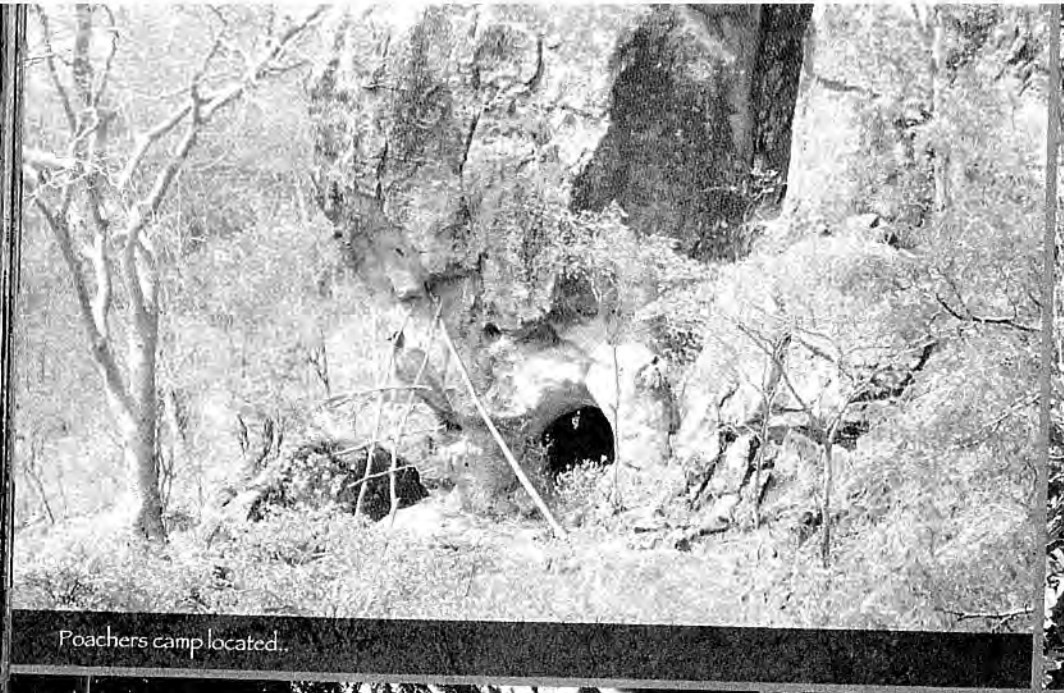


All that is left of the Rhino that once roamed the Zambezi Valley in hunting areas, hopefully one day we will see the return of these noble beasts to wild areas…Extinction is not an option!!!!



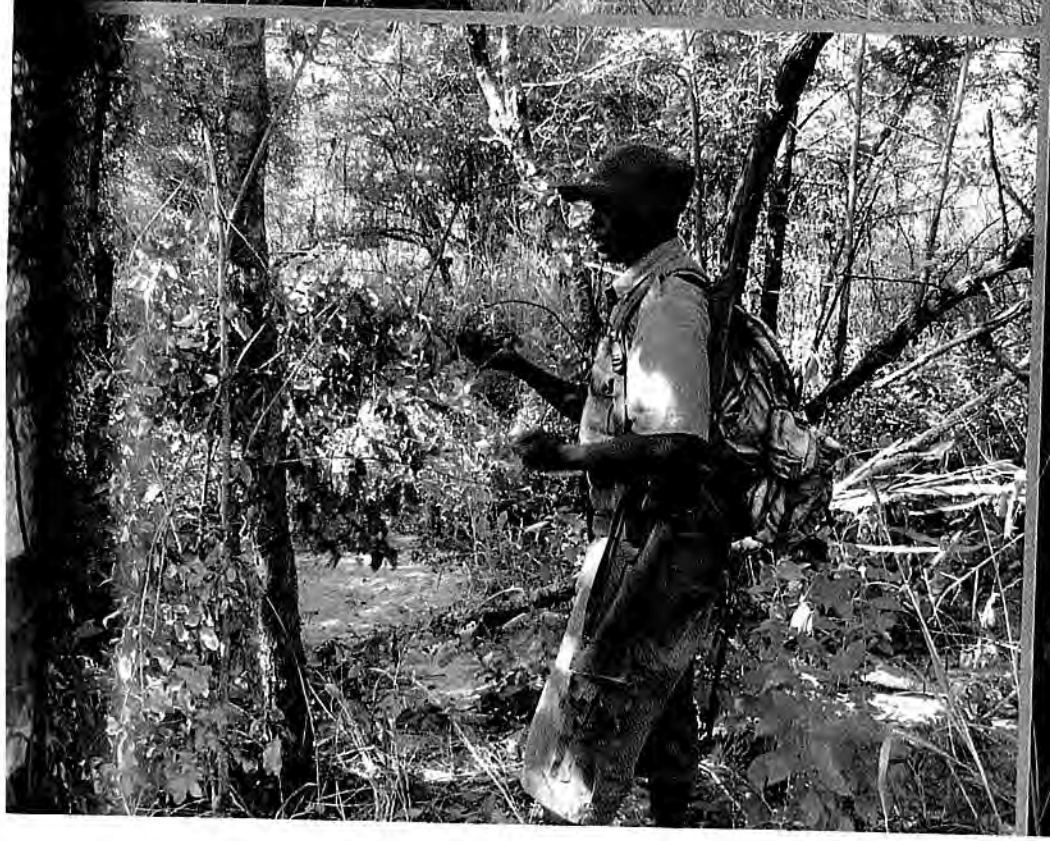
The team being deployed for a worthy cause...

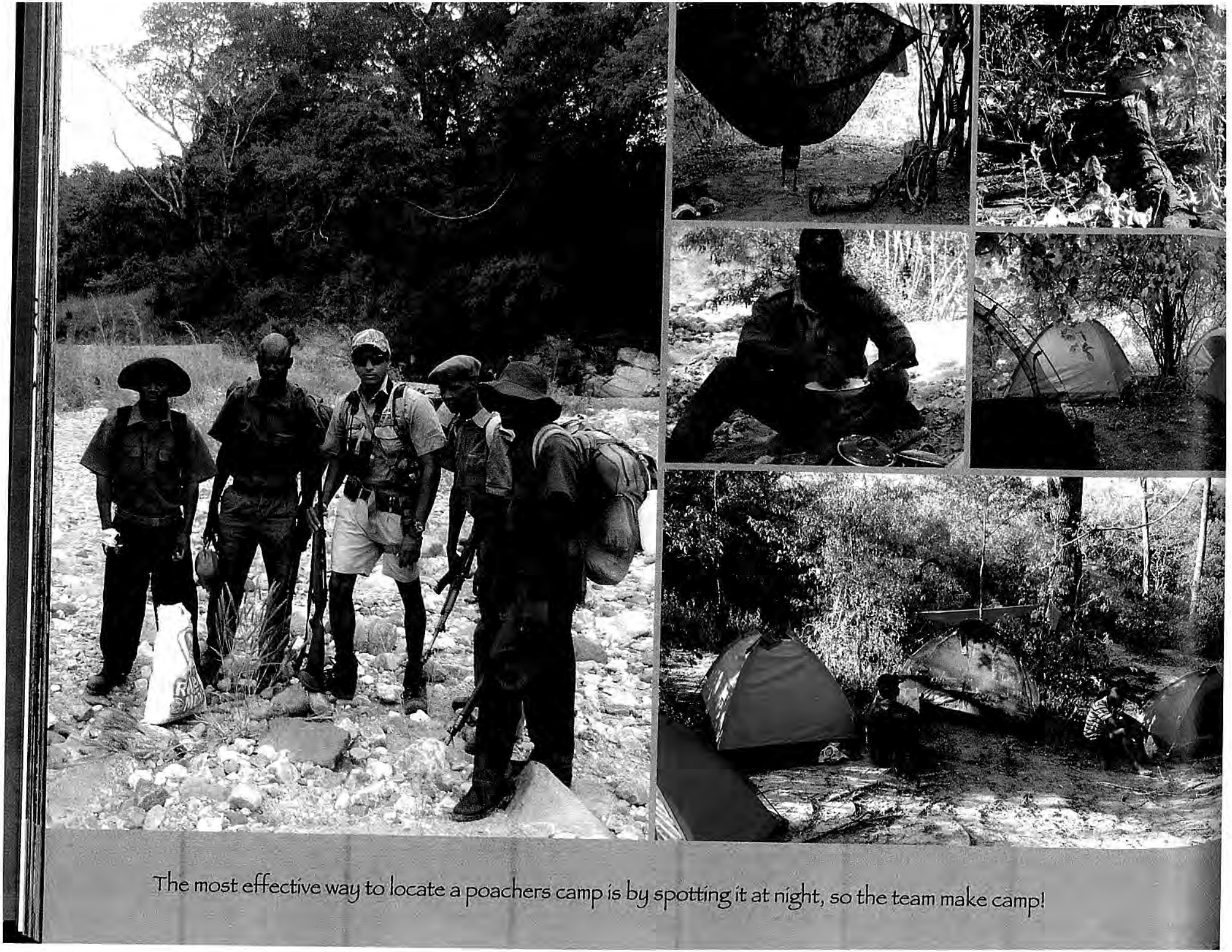

EXIT



Poachers camp located..

Wire snare..

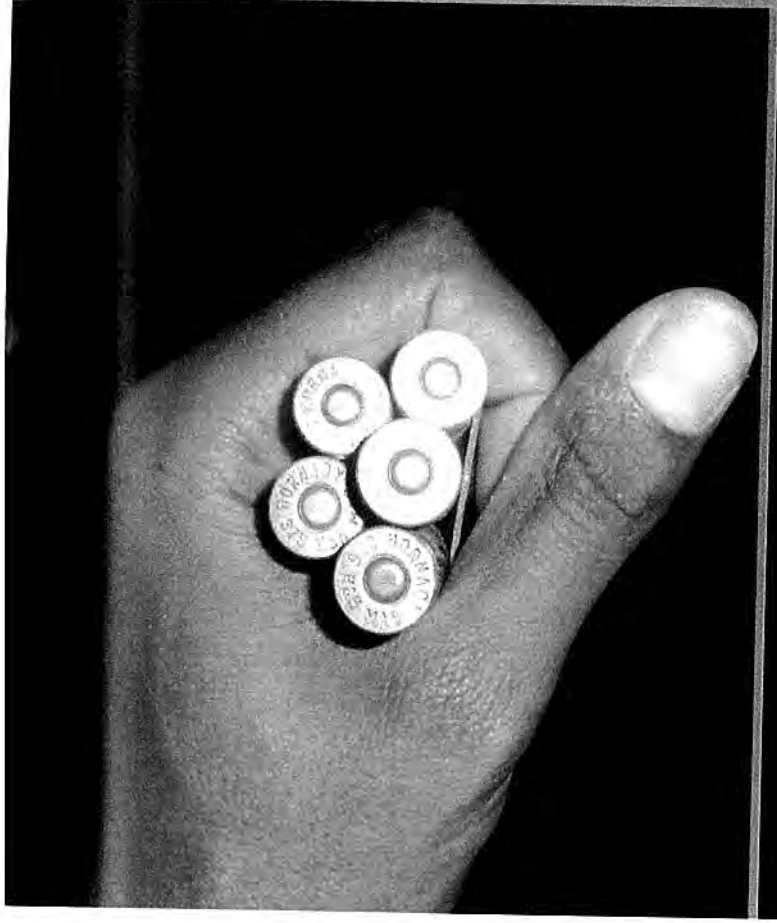




The most effective way to locate a poachers camp is by spotting it at night, so the team make camp!

After dark operations take effect... A zero tolerance policy is taken with ivory poachers! With the combined efforts of D.A.P.U, Zimbabwe Republic Police, National Parks and Council Rangers another ivory poacher is stopped..

Anti-tracking footwear worn by poacher...



Charlton McCullum Safaris continue to work towards bettering the area for all people who live in the Dande Safari Area- building of dams, local charity events and also providing much needed protein to needy families!

D.A.P.U 2014 INCOME

From CMS clients US $35904,00

From CMS US $36757,00 TOTAL US $72661.00

2014 D.A.P.U EXPENSES

EXPENSES	SCOUTS	MANAGEMENT (Bongi&Siraj)	RATIONS	REWARDS	TOTAL
JANUARY	US $500	US $1400	US $350	US $0	US $2250
FEBRUARY	US $500	US $1400	US $350	US $0	US $2250
MARCH	US $500	US $1400	US $350	US $422	US $2672
APRIL	US $1100	US $1400	US $770	US $212	US $3482
MAY	US $1100	US $1400	US $770	US $670	US $3940
JUNE	US $1100	US $1400	US $770	US $1597	US 4867
JULY	US $1100	US $1400	US $770	US $503	US $3773
AUGUST	US $1100	US $1400	US $770	US $96	US $3366
SEPTEMBER	US $1100	US $1400	US $770	US $250	US $3520
OCTOBER	US $1100	US $1400	US $770	US $597	US $3867
NOVEMBER	US $1100	US $1400	US $770	US $3910	US $7180
DECEMBER	US $1100	US $1400	US $770	US $1268	US $4538
Christmas	US $1675	US $1400	US $770	US $0	US $3845
TOTAL	US $ 13075,00	US $18200,00	US $8750,00	US $9525,00	US $49550,00

EQUIPMENT i.e. Backpacks, radios x 5, uniforms, GPS devices, cameras, tents ammunition, gun repairs, shotguns x 6 , raincoats

	2015	2014
	US $13322,00	US $6861,00

D.A.P.U Vehicle Landcruiser 32500Km's @$,5/Km

	US $16250,00	US $16250,00

TOTAL EXPENSES US $72661,00

D.A.P.U 2015 BUDGET

	2015	2014
From donors/clients	US $40000,00	US $35904,00
From CMS	US $40837,00	US $36757,00
TOTAL	US $80837,00	US $72661,00
LESS EXPENSES		
Rangers wages (paid from January in 2015)	US $14300,00	US $13075,00
Management	US $18200,00	US $18200,00
Rations (from January x 22 rangers)	US $9240,00	US $8750,00
Rewards	US $9525,00	US $9525,00
Equipment	US $13322,00	US $6861,00
Landcruiser operating costs	US $16250,00	US $16250,00
TOTAL	US $80837,00	US $72661,00
Shortfall	US $0	US $0

2014 D.A.P.U SUMMARY

	No of Snares	Dogs shot	Meat Poachers (convicted)	Elephant poachers	Weapons retrieved	Rewards paid
March	46	2	5	0	2	US $422.00
April	91	1	0	0	4	US $212.00
May	95	1	2	0	4	US $670.00
June	311	0	6	0	5	US $1597,00
July	149	0	1	0	1	US $503,00
August	48	0	0	0	0	US $96,00
September	125	0	0	0	0	US $250,00
October	221	3	2	0	1	US $597,00
November	955	0	0	2	2	US $3910,00
December	334	0	4	2	3	US $1268,00
TOTAL	2375	7	20	4 (2 DECEASED)	22	US $9525,00

D.A.P.U and Charlton McCullum Safaris would like to thank the following people for their generous donations...

Saeed Al Maktoum
Dave Adams
Jytte Mejnertsen
Mike Jines
Jerry Jurena
David Maple
Jerry Dollar
Bob Keeler
Zdenek Sedmik
Marty Vick
Todd Williams
Carey Renner
Martinus van der Reyden
HOUSTON SCI
Mark Proudfoot
Odin Rorvik
Mike Core
Jeff Norman
Brett Barnes
Casey Terry
Carl Nagell
Per-Arne Ahlen

And all those whom left anonymous donations, without these people the battle against poaching would have been harder than ever....

THANK YOU

TOYOTA

Sworn Declaration of Chrissie Jackson, Treasurer of Conservation Force

I am Chrissie Jackson, Treasurer of Conservation Force, and I swear under penalty of perjury as follows:

Conservation Force has partnered with Charlton McCallum Safaris on the DAPU Anti-Poaching Project by collecting donations/additional money $15,000.00 from hunters which have paid in 2014 and 2015.

2014 Donations:

3/14/14	$ 500.00	Jyette Mejnersten
3/14/14	$ 5,000.00	David J. Adams
3/14/14	$ 750.00	Michael Core, CPA
3/31/14	$ 250.00	Martinus Van der Reyden
4/20/14	$ 500.00	Jyette Mejnersten
4/20/14	$ 200.00	Dennis E. Milburn
5/25/14	$ 200.00	Lorinda Van Der Reyden
7/21/14	$ 100.00	Carey L. Renner
7/21/14	$ 150.00	Christopher Longley
7/21/14	$ 250.00	George W. Debell
12/3/14	$ 500.00	Jyette Mejnersten
12/19/14	$ 1,000.00	W. Terry Patrick
12/20/14	$ 5,000.00	David J. Adams

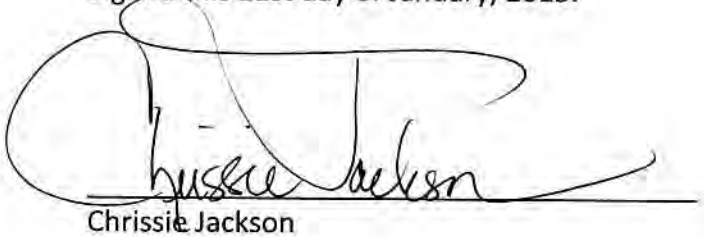
2015 Donations:

1/19/15	$ 100.00	Thomas C. Becker
1/19/14	$ 500.00	Jyette Mejnersten
Total	$ 15,000.00	

This $15,000.00 is above and beyond the sum included in the summary they have in their book. Neither sum includes the far greater sum paid directly to the community for the elephant taken. These funds are used only for anti-poaching efforts in Dande East and Dande Safari Area's in Zimbabwe. These contributions will assist in improving the Dande North and East hunting concessions for the benefit of all hunters to come and the local communities.

Sworn to under penalty of perjury.

Signed this 21st day of January, 2015.



Chrissie Jackson

Capital One Bank

CUSTOMER WIRE REQUEST FORM (DOMESTIC)

AMOUNT OF WIRE: $15,000.00

ACCOUNT NO. TO DEBIT: (b) (6)

TITLE/ADDRESS:
Christian [redacted] Jackson, Treasurer
Conservation Force
4501 Neyrey Drive
Metairie, Louisiana 70002

CUSTOMER PHONE NO: (b) (6)

CUSTOMER REQUESTING TRANSFER: Christian [redacted] Jackson

BENEFICIARY INFORMATION

BENEFICIARY ACCOUNT NO: (b) (6)

BENEFICIARY NAME: Global Marketing Consultants

BENEFICIARY ADDRESS:
400 Pine Street
Abilene, TX 79601-5140

ADDITIONAL INFO: (ORIG TO BENE) For DAPU Anti-Poaching Project

FINANCIAL INSTITUTION INFORMATION

RECEIVING BANK NAME: Prosperity Bank

ROUTING NO: (b) (6)

BENEFICIARY BANK ID:

BENEFICIARY BANK ID CODE:

BENEFICIARY BANK NAME: Prosperity Bank

BENEFICIARY BANK ADDRESS:
101 South Main Street
Victoria, TX 77902-1338
(361) 573-6321

INTERMEDIARY BANK ID:

INTERMEDIARY BANK ID CODE:

INTERMEDIARY BANK NAME:

INTERMEDIARY BANK ADDRESS:

BANK TO BANK INFO:

CUSTOMER'S SIGNATURE: Christian (b) (6) Jackson **DATE:** 21 January 2015

EVOLUTION & INNOVATION IN WILDLIFE CONSERVATION

Parks and Game Ranches to Transfrontier Conservation Areas

edited by Helen Suich and Brian Child with Anna Spenceley

5

The Emergence of Modern Nature Conservation in Zimbabwe

Graham Child

Zimbabwe's formal commitment to nature conservation commenced with the Game Law Amendment Act, 1891, a year after white settlement began in what was then Rhodesia (Thomlinson, 1980).[1] Previously the indigenous people had had mostly weak conventions that helped to conserve wild animals. They had also set aside religious sanctuaries and the Ndebele, at least, had created a large royal hunting preserve along the Shangani River (Child, 1995). The first formal reserves set aside after the establishment of white government were the Rhodes Matopos and Rhodes Nyanga national parks, created in 1902 on land purchased privately by Cecil John Rhodes and entrusted to the nation in terms of his will.

The Rhodes Estate

In one of his many philanthropic legacies, Rhodes donated scenically spectacular and historically and prehistorically significant land with a high intrinsic biological diversity in the eastern border mountains (Nyanga) and the Matopo hills, for the citizens of Zimbabwe to enjoy. Nyanga was provided with a hotel, and Matopos two. A rail link – required by Rhodes – enabled the citizens of Bulawayo 'to enjoy the glory of the Matopos from Saturday to Monday' (Tredgold, 1956, p6). Besides outdoor recreation, Rhodes decreed that his land should be used for agricultural research and training and should be planted with all types of trees, including exotic species. This extended to a zoo at Matopos. The zoo housed sable antelope, which apparently provided the founders of the park's present population, having escaped when the zoo's fence was washed away by the Maleme River.

The mixing of agricultural, nature conservation and managed landscape

people, both productively and recreationally. He does not seem to have been influenced by the Yellowstone model, which was known in Zimbabwe by then. In 1899, a member of the Legislative Assembly, Dr Sauer, proposed that an area of land should be reserved in the country in the manner of the Yellowstone National Park, but his suggestion was rejected by the Assembly as conflicting with the rights of the British South Africa Company (Cumming, 1981).

Rhodes provided an endowment for each park to be managed in terms of his will. In the case of Matopos, this was to yield at least GB£4000 per year. The agricultural commitment was satisfied initially by the Matopos agricultural and Nyanga horticultural research stations and by the Matopo Agricultural College, which proved unviable and was later converted into a primary school. The land bequeathed by Rhodes at Matopos and Nyanga has been added to by successive governments, to form two of the prime national park complexes for recreation and the conservation of biological diversity in Zimbabwe.

Initially the parks were managed by the Rhodes Trustees, but the responsibility passed to the administration in 1918, by order of the Legislative Council.[2] The areas were called national parks and administered by local committees for almost half a century before their management was passed to the Department of National Parks and Wild Life Management (DNPWLM). Following the transfer, the special management committees were retained for both parks, and Nyanga, in particular, is managed in accordance with a budget that is largely discrete from that for the rest of the wildlife and parks authority. The two parks, being at least partially on trust land, became Special National Parks by Proclamation No. 48 of 1953.

In the meantime, the land around the Matopos Dam had apparently received some sort of protection in 1926 (IUCN, 1987). The old Mtarazi National Park, contiguous with Nyanga was added to the Special National Park for administrative convenience. In 1975, the Matopos complex was divided into the national park and a recreation park, incorporating the Matopos Dam and an area with camps for Boy Scouts and Girl Guides, on the land where Baden-Powell conceived the worldwide scouting movement (Baden-Powell, 1897). The Tshabalala Sanctuary, on the boundary of the city of Bulawayo on land that had been owned by Rhodes, was added to the complex in the 1970s, when leases to private individuals on seven farms owned by the Rhodes Trustees were terminated and the land was split between the parks estate and the Matopos Agricultural Research Station on the advice of a parliamentary committee.

Taming the wilderness

White settlement brought population growth and a determination to tame the wilderness. In rural areas this led to the rapid intensification of crop and livestock production and the opening up of numerous lands. In this context, most rural people viewed wildlife and ecological reserves as unaffordable luxuries that were incompatible with mainstream progress. As a result, reserves demanded by a few persistent conservationists were created only in vacant or sparsely settled areas, on land judged as unsuitable for peasant or commercial agriculture. Elsewhere, it was unofficial government policy to eliminate wildlife where it was perceived to threaten agriculture.

The most wasteful anti-wildlife measures were government actions to control tsetse fly (particularly to protect white-owned commercial ranches) and the shooting out of buffalo in an unsuccessful attempt to eliminate foot-and-mouth disease. Both activities were undertaken without scientific evidence and showed a disregard for the considerable damage they caused to the environment, particularly wildlife.

Over 659,000 game animals were shot in relatively confined areas in the Zambezi and Savé valleys as part of tsetse control measures between 1919 and 1957–1958 (Child and Riney, 1987) without eliminating any reasonably common species. Black rhino were almost exterminated from the hunting areas and sensitive grazers and eland were shot in declining numbers as the hunting programme progressed, but the most favoured tsetse food animals (warthog, bushpig, kudu and bushbuck) (Weitz, 1956) held their own or increased during 38 years of being hunted. This applied to several other species including elephant and buffalo. More significantly, tsetse control led to habitat deterioration, some of it in parks and reserves. Early seasonal veld burning was undertaken to facilitate the hunting and protect insecticides (like DDT and Dieldrin) from later burns, suppressing the perennial grasses on which stability in savannas depends. This encouraged bush encroachment, leading to accelerated loss of topsoil. Other tsetse control measures included the destruction of the woody riparian vegetation along watercourses and the destruction of the near endemic ironwood forest patches and seasonal pans in the Gonarezhou. The pans, in particular, were essential habitat for many non-target species, including an endemic killifish, whose global range is limited to a few of the pans.

Most tsetse control in Zimbabwe represented misdirected public sector investment. It was undertaken by competent, honest hard-working civil servants, unwittingly causing serious environmental degradation and foreclosing options to use wildlife, mostly in communal areas. Fragmentation of government bureaucratic responsibilities that led to tsetse control authorities being unaccountable for the state in which they left land, or for ensuring that its subsequent use was sustainable, cannot be blamed entirely for the fiasco. Public objections to the programme were ignored by the responsible authority, which did good research on tsetse but failed to examine the broader ecological, economic and social merits of its programme. Some of the criticism was

driven by sentiment, but much arose from sound logic with national interest in mind.

Tsetse control was a prime example of government agencies having mandates that affect land quality and long-term productivity, but remaining unaccountable for ensuring that land quality and productivity were maintained. Unfortunately nature conservation agencies and their fellow travellers who see their mandate as the production of large numbers of herbivores in response to public demand, irrespective of the effect on habitats, are not immune from the same malady.

The greater parks and wildlife estate

Early conservation legislation in Zimbabwe was concerned primarily with protecting game and regulating hunting. The Hwange Game Reserve was created in 1928 in anticipation of a governor's proclamation under the Game and Fish Preservation Act 1929, which enabled him to 'define reserves within which it shall not be lawful without special permission ... to hunt'. The proclamation of the Victoria Falls Game Reserve (Taylor, 1990), which incorporated a previously proclaimed national monument extending over the falls themselves, and the Hurungwe Game Reserve followed in 1931. The first national parks, other than Matopos and Nyanga, were declared in the 1950s and 1960s in terms of the National Parks Act, 1949. This Act described a national park as an area 'for the propagation, protection, and preservation therein of wild animal life, vegetation and objects of geological, ethnological, historical or other scientific interest for the benefit, advantage and enjoyment of the inhabitants of the colony'. The early days of Hwange are traced by Ted Davison, the founder warden, who describes how the original park was expanded through the addition of contiguous commercial farms (Davison, 1967).

The setting aside and the key attributes of these and subsequent ecological reserves in Zimbabwe is indicated in Table 5.1, which shows the legal status of the areas in terms of the Parks and Wild Life Act, 1975, which rationalized the classification of protected areas. The Act followed the 1969 Wild Life Commission (Petrides and Pienaar, 1969), which found that even enlightened members of the Zimbabwean public and stakeholders in the wildlife sector had only a hazy idea of the contemporary international perception of a national park. This is not surprising, as many prime areas were still classified as game reserves and a number of the reserves then classed as national parks were used for more extensive recreation around large dams close to urban centres.

The confusion arose partly because jurisdiction over ecological reserves devoted to wildlife and recreation was still split between the federal and territorial governments. Game reserves and controlled hunting areas were created

Table 5.1 *Zimbabwe's national parks, botanical reserves and gardens, sanctuaries, safari and recreation areas*

Protected area	Area (ha) [Area of water, ha]	Main features
National parks		
Chimanimani	17,100	Mountainous area
Chizarira	191,000	High plateau and low veld with game
Gonarezhou	496,400	Semi-arid low veld with game
Nyanga	32,132	Mountainous area
Kazuma Pan	31,290	Open plains with game
Mana Pools	220,000	Zambezi valley with game
Matopos	44,200	Kopjes, biological diversity and history
Matusadona	137,000	Kariba escarpment, lake and game
Victoria Falls	1900	Waterfall and spray forest
Hwange	1,462,000	Semi-arid savanna and game
Zambezi	56,400	Upper Zambezi River and game
Total	**2,689,422**	
Botanical reserves and gardens*		
Pioneer	38	Fuchsia trees, *Scotia brachypetala*
Tolo River	44	*Acacia galpinii* trees
South Camp	26	Nyala berry trees, *Xanthocercis zambesiana*
Chirinda	949	Mountain forest
Banti	175	Yellow woods, *Podocarpus milanjianus*
Stapleford	212	Cycads, *Encephalartos manikensis*
Sebakwe I	60	Acacia Karoo
Sebakwe II	163	Great Dyke flora
Sebakwe III	53	*Brachystegia glaucescens*
Bvumba	201	Botanical garden, mountain forest
Chisekere	94	Hot springs and mangrove fern
Miware	34	Raphia palm, *Raphia farinifera*
Tingwa	290	Raphia palm, *Raphia farinifera*
Mazoe	8	*Brachystegia glaucescenes*
Bunga	1558	Mountain forest
Shashi	4300	Mulala palm, *Hyphaene banguellensis*
Chingwarara	256	Cycads, *Encephalartos concinnus*
Kubarakwawena	2	Bamboo, *Oxytenanthera abyssinicai*
Marishira	2	Bamboo, *Oxytenanthera abyssinicai*
Nyanzwe	8	Low-altitude evergreen forest
Pungwe Bridge	14	Low-altitude evergreen forest
Rumise	39	Low-altitude evergreen forest
Tegwe	4	Bamboo, *Oxytenanthera abyssinica*
Haroni	20	Low-altitude evergreen forest
Rusitu	150	Low-altitude evergreen forest
Ewanrigg	286	Botanical garden
Harare	67	Botanical garden
Total	**9053**	

Table 5.1 *Continued*

Protected area	Area (ha) [Area of water, ha]	Main features
Sanctuaries		
Chimanimani	1200	Conservation of relict eland herd, protection of town water supply and Bridalveil falls
Manjinji	300	Bird sanctuary on oxbow lake of Wanezi River; riverine vegetation
Mbaze	40	Bird sanctuary on oxbow lake on Shangani River
Mushabdike	12,900	Staff training college
Tshabalala	1200(?)	Game park on the outskirts of city of Bulawayo
Total	**15,640**	
Safari areas		
Chete	108,100	Single safari hunting concession
Hartley A	71,597	Uncertain – previously leased to hunting association
Hurungwe	288,000	Individual hunts and hunting association lease
Chewore	339,000	Several hunting concessions
Sapi	118,000	Individual hunts
Tuli	40,400	Previously individual hunts
Doma	76,400	Previously leased to hunters association
Chipinge A	26,100	Previously leased to hunters association
Mufurudzi	76,000	Non-hunting tourism concession
Chirisa	171,000	Wildlife research, hunting concession
Malapati	16,200	Used as part of Gonarezhou National Park
Dande	52,300	Safari hunting in community-based natural resource management programme concession
Charara	170,000	Individual hunts and game viewing
Matetsi	292,000	Seven safari hunting concessions
Total	**1,845,097**	
Recreation parks		
Kyle	16,900 [9105]	Impoundment in attractive kopjes, game park and research, angling, commercial fishing
Chinhoyi	148 [0]	Dolomite caves
Binga	2 [0]	Hot spring (small geyser)
Lake Chivero	6100 [2630]	Impoundment near Harare, game park, angling, commercial fishing, boating, bird viewing and research
Ngezi	5800 [580]	Great Dyke flora, some game, quiet recreation
Sebakwe	2700 [1518+]	Yachting, flora, Great Dyke
Bangala	2800 [1133]	Undeveloped
Manjirenji	3501 [2023]	Undeveloped
Umzingwani	1233 [456]	Undeveloped
Kariba	283,000 [c.280,000]	Boating, angling, commercial fishing and research, crocodiles, safari camps and hotels
Total	**322,184 [297,445]**	

Note: * About 2496ha are in the parks and wildlife estate, of which 2112ha are in separate areas outside other reserves

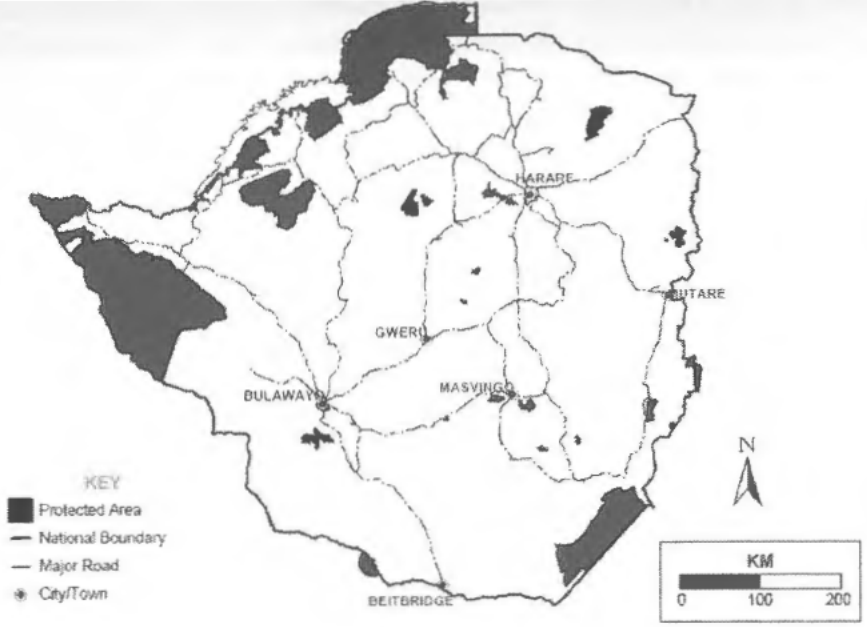
Source: Adapted from Child (1977)

by the Southern Rhodesian Territorial Government, mainly in the early 1960s, and were administered by the Southern Rhodesian Game Department. The national parks were recognized earlier and were administered by the Federation of the Rhodesias and Nyasaland Government, through its National Parks Department (which had jurisdiction only in Southern Rhodesia). Other reserves were managed by the Southern Rhodesian Forestry Commission, the Ministry of Internal Affairs (responsible for administering the African Area covering 42 per cent of the country), as well as private game reserves that fell under the control of the private sector.

Sociologists are sometimes critical when land is kept from peasant settlement for nature conservation, so it is interesting to point out that relatively few people were displaced by the formation of the parks and wildlife estate in Zimbabwe. It is also useful to recall that the human population has grown to three times the size it was when most areas were set aside in the early 1960s. At that time, the areas were mostly rejected as unsuitable for settlement and were largely unoccupied, although a number including the Mana Pools, Gonarezhou, Matopos and Nyanga national parks had had a history of peasant settlement and the Matetsi area and parts of Hwange had been white-owned commercial farms.

There was considerable rivalry and a number of turf battles between the government agencies responsible for ecological reserves, particularly among staff at the field level. This largely ceased with the break-up of the federation, when the national parks and wildlife conservation departments were amalgamated in 1963, to form the DNPWLM (Gibson, 1963). What were legally 'private' game reserves in the African Area were absorbed into the parks and wildlife estate in 1975 (Child, 1975), although the Internal Affairs Game Section, responsible for wildlife outside parks and reserves in communal areas was not incorporated into the department until after Independence in 1980.

The classification of ecological reserves (known jointly as the Parks and Wild Life Estate (see Figure 5.1) into national parks, botanical reserves and botanical gardens, sanctuaries, safari areas and recreation parks was undertaken in terms of the 1975 Act, and has changed little since then. There is a gradation in the emphasis placed on maintaining areas in a natural state from national parks, safari areas (and to a lesser extent because of their small size, botanical reserves) to sanctuaries, recreational parks and botanical gardens, and an opposite gradient in the extent to which the areas can be utilized for outdoor recreation. However, all are important to both the national programme for conserving biological diversity and for tourism. Each class of area is managed in terms of an appropriate section of the Parks and Wild Life Act, according to a specific policy that describes the management objectives for the area and how the Act should be applied in it (Child, 1975).



Source: WWF-SARPO (2008)

Figure 5.1 *Parks and wildlife estate of Zimbabwe*

An outline plan accompanies most area policy documents, explaining the management objectives for the park or reserve and describing how it is to be divided into zones of permissible use. In the main, these are: special conservation areas (mostly small areas to protect especially sensitive biological features, or for scientific research with no public access, at least seasonally); wilderness areas (areas with minimal development in which the level of visitation is strictly limited, but in which visitors are allowed considerable freedom of action); wild areas (the main zones of public use with good access in which visitor activities are more prescribed); and development areas (where there may be considerable development of staff facilities and visitor amenities).

The estate, with minor exceptions, is administered by what is now known as the Parks and Wildlife Management Authority (formerly the DNPWLM). The aim of the tourism and visitor use policy is to provide an integrated combination of areas in which a reducing intensity and diversity of recreational opportunities is accompanied by an increasing quality of the wilderness experience, from recreation parks through to sanctuaries, botanical gardens and safari areas. In all cases, the aim has been to optimize the permitted throughput of visitors using an area, while preserving the natural qualities prescribed for that area. This has involved regulating visitor usage to minimize their impact on the environment and each other, and constructing visitor amenities of natural materials like stone and thatch, and using neutral colours to minimize visual impact. Within these limits, visitors are offered a variety of activities and allowed freedom and contact with nature.

Sport hunting has been permitted in most safari areas since their inception as non-hunting areas, game reserves or controlled hunting areas. This introduces an anomaly. The IUCN classification of so-called 'protected areas' (IUCN, 1994) places safari areas in a lowly Category VII, implying a much lower conservation status than national parks in Category II, because of hunting (see for example IUCN, 1987). This is in spite of the fact that, in Zimbabwe, the two classes of land are managed similarly to conserve natural values, and that accommodating non-hunting tourists requires greater infrastructure and makes much heavier demands on the environment than catering for hunting tourists. In addition, the Sapi and Chewore Safari Areas are part of a natural World Heritage Site. Nevertheless, the difference in the IUCN status has prompted several commentators (for example Huntley, 1987) to omit safari areas from Zimbabwe's list of internationally recognized prime conservation areas.

As in many nations, Zimbabwe's ecological reserves were created to preserve land with a strong human appeal, perceived to be of particular natural excellence, with tourism and outdoor recreation important justifications for setting aside 12.7 per cent of the country by 1981 (Lightfoot, 1981). Thus the estate includes samples of much of the nation's spectacular scenery, geological formations, wildlife assemblages and even its natural curiosities. Although, the estate is located mostly on land with a low agricultural potential, rejected for any kind of farming when the areas were proclaimed, Child and Heath (1992) found that the parks, wildlife and forestry estates together sampled all but 3 of the 25 major ecotypes in the country, recognized by Wild and his co-workers (a group of eminent botanists who demarcated the ecotypes) (Wild, 1965; Wild and Fernandes, 1967; Wild and Grandvauz Barbosa, 1968) (see Table 5.2). In fact, they argued that the greatest threat to the country's biological diversity came from an overabundance of elephant in at least 53 of the 88 reserves in the estate, and in a number of forestry areas. It is a measure of failed conservation that the elephant population has been allowed to increase to a conservative estimate of 100,000 head when sound evidence (Craig, 1989; Martin, 1989) indicates Zimbabwe can support no more than 50,000 head sustainably.

The relationship between state-sponsored wildlife conservation and the overall wildlife sector

Zimbabwe built up an impressive commercial wildlife sector from small beginnings in the late 1950s, but this has been severely harmed since 1999.

Table 5.2 *Representation of vegetation types in ecological reserves, Zimbabwe*

Vegetation class	Vegetation type	Parks and wildlife estate	Forest reserves	Total	No. of areas with dense elephant populations
Forest	Med. Altitude closed	3	2	5	0
	Moist montane	2	2	4	0
	Dry montane	0	0	0	0
Thicket	*Commiphora–Combretum*	6	0	6	6
Woodland	*Baikiaoa*	4	10	14	4
	B. spiciformis on Kalahari sand	0	5	5	0
Savanna Woodland	*B. spiciformis–J. globiflora*	8	4	12	1
	B. Boehmii–J. globiflora	13	4	17	7
	J. globiflora	6	0	6	5
	C. mopane	17	8	25	15
Tree Savanna	*Baikiaea–Burkea–C. mopane*	1	2	3	1
	Parinari	0	0	0	0
	P. angolensis–Pericopsia–Acacia	1	0	1	1
	Commiphora–Combretum	1	1	2	1
	Terminalia serioea	5	2	7	3
	Acacia spp.–*Albizia–Bolusanthus*	7	0	7	1
	Adansonia–Sterculia–Kirkie	1	0	1	1
	C. mopane	3	0	3	2
	A. nigrescense–Combretum	0	0	0	0
	Acacia–L. nelsii	1	2	3	1
Shrub Grassland	*C. mopane*	2	0	2	2
	Loudetia	2	1	3	2
	Andropogon	2	0	2	0
	Hyparrhenia	0	1	1	0
	Montane	3	5	8	0
No. of types in area		88	49	137	53

Source: After Child and Heath (1992)

Despite this, for over 40 years the sector has provided many lessons of the ingredients for sound conservation and use of wild resources. Dr Reay Smithers, then Director of the National Museums, initiated questioning of the potential (but institutionally suppressed) value of large game animals and the many biological research opportunities that they offered. He catalysed a visit to Zimbabwe by three eminent US Fulbright scholars in 1958 to help exploit these opportunities. At that time, knowledge of Africa's big game animals had scarcely proceeded beyond the taxonomy and biogeography of the species (see for example Roberts, 1951) and hunters' anecdotes of their ecology and behaviour (for example Shortridge, 1934).

In the three years they were in Zimbabwe, the three Fulbrights planted many innovative ideas and stimulated local wildlife personnel to re-engineer the wildlife industry and the institutional framework guiding it. The small Department of Wild Life Conservation (subsequently the DNPWLM) with its two terrestrial biologists and progressive director were convinced that wildlife was ecologically superior to livestock and offered an opportunity to diversify ranching and reverse the widespread ongoing environmental deterioration resulting from a cattle monoculture. They were also convinced that, unless landholders wanted wildlife to be present on their land, there was nothing government could do to prevent its disappearance outside of parks and reserves. As many ranchers were cash-strapped, it followed that unless the ecologically more desirable game animals could at least compete financially with livestock, they would not be retained in significant numbers. Subsequent research demonstrated that it was the economic properties of wildlife, more than its ecological attributes, that gave it a comparative advantage over cattle. This is because wildlife enterprises tend to add economic tiers (for example tourism and hunting) to a normal animal production system, and depend on human initiative and effort and not local environmental energy. This can result in wildlife outcompeting livestock by a factor of four or more, both financially and economically (Child, 1988, 1990a, 1990b, 1990c, 1995).

The Wild Life Conservation Act, 1960, introduced to consolidate and update the existing game laws, allowed game ranching under permit. It was the test bed for the subsequent Parks and Wild Life Act, 1975, which accorded landholders considerable freedom to use wildlife (other than 'Royal Game') on their properties and to trade freely in the resulting products. Cautious adaptive institutional reform under the 1960 Act, and more rapid progress after 1975, which grew from the confidence gained from successes during the reform phase, vindicated the original belief in the merits of wildlife. These, however, depended on getting proprietorship and prices right (Child and Chitsike, 2000; Child, 2000a, 2000b). The institutional arrangement that emerged was strengthened by linking wildlife to the natural resources movement, with its proven record of promoting soil conservation and sound agricultural practices, and made landholder communities the first level of regulatory control over their members.

The importance of conserving biological diversity, the use of what has come to be called adaptive management, and research in the DNPWLM were but some of the more momentous and innovative outcomes championed by the three Fulbrights that were implemented by far-sighted local officials.

When the existing colonial-type protectionist game laws embodying centralized management of the resource were challenged and defeated in the courts, new legislation became essential (Child, 1995). A man was prosecuted for hunting Royal Game on his farm, but argued that it was eating natural forage which was his property, which he had the right to protect. The judge agreed and thus recognized that wild animals carry an opportunity cost and this cost of conserving them could not be imposed on landholders by society. The decision meant the authorities could no longer prevent landholders from hunting browsing and grazing animals on their land, so the Parks and Wild Life Act, 1975 delegated control over wildlife to private landholders, making them the custodians of the resource. The Act encouraged them to use most species sustainably and to maximize their profit from doing so. With that, the countrywide decline in wildlife outside ecological reserves was halted and reversed, as the growth of the wildlife industry over the next couple of decades in both communal and commercial farming areas demonstrated. The impressive increase in land devoted to wildlife and in the number of registered wildlife producers after 1975 were powerful surrogate measures of the rapid increase in wildlife numbers that became obvious in many parts of the country (for example Child, 1988, 1995; Cumming, 1989; Skinner, 1989).

Strengthening institutions to conserve and use wildlife outside the estate was highly cost effective and lent considerable credibility and political leverage to the wildlife agency. Many wild animals used to restock depleted habitats came from the estate, and the DNPWLM conducted much research that was useful to the wildlife sector. Trading ineffective power and dependence on regulation and law enforcement for effective influence based on landholder-friendly institutions and encouraging wildlife producers led to the growth of a strong wildlife sector in which the DNPWLM was a key player, both as a major producer and the regulatory authority.

It was not long before the private sector began challenging the supremacy and quality of the tourism and hunting provided by the estate and generating relatively more income than the DNPWLM from lesser wildlife. This occurred even though many of the private enterprises were in competition with subsidized government ventures, which undersold the same products (Child and Heath, 1990). Private entrepreneurs were, however, able to exploit the large markets developed by the state through its underpricing of hunting and other services in the estate. Providing high quality cheap tourism was one of several measures taken by government to stimulate a quality nationwide industry that could compete with the best in the region – during a period of international sanctions – to attract valuable foreign currency, create jobs and persuade citizens to holiday in the country.[3] It is interesting that, in the early 1970s, the recurrent costs of the departmental division responsible for tourism were met from revenue generated by low tariffs and gate charges.

The role and influence of the services offered in the estate by the DNPWLM diminished after Independence in 1980, at the same time that the private sector burgeoned in response to the rapidly growing economy and the lifting of international sanctions. From being the third largest 'hotel group' in the country, the DNPWLM declined into a relatively minor player, as it was required to restructure to facilitate black advancement. Furthermore, Treasury allocations for its tourism services did not keep pace with either the costs of providing the services or the demand for them. During this period, performance and the revenue generated by individual agencies had little influence on Treasury allocations, which were subject to across-the-board cuts for large swathes of government, as post-Independence inflation gathered momentum. This undermined staff morale as the department's corporate culture became more *laissez-faire* under a socialist government and the quality of services declined. The department had always lacked the information needed to operate efficiently in a free market situation, but a further decline of its entrepreneurial skills after the mid-1980s severely weakened its ability to compete on reasonable terms with the private sector. As a result, it was greatly handicapped when it was thrown in the deep end and expected to live from its own income from 1999, on advice from the World Bank.

Conclusions

Nature conservation featured early in the colonial history of Zimbabwe, when formal provisions were introduced to supplement, and then replace, the weak measures required by a sparse indigenous population. Until the middle of the 20th century, no single government agency was charged with the implementation of national nature conservation policy. This changed and the responsibilities were centralized with the creation of a Federal National Parks Department in about 1949 and a Southern Rhodesian Game Department in 1952. The parks and wildlife estate was greatly expanded during the early years of these agencies, culminating in the areas added with the promulgation of the Parks and Wild Life Act in 1975. After that, most of the conservation areas, such as the Lake Kariba Recreation Park, were created in order to formalize previous administrative arrangements.

Amalgamation of the two departments in 1963 coincided with considerable political controversy over the way in which government was managing wildlife. This acrimony culminated in parliament setting up a Wild Life Commission to examine and report on the way it was being managed, and to suggest improvements. The commission's report in 1970 did much to clear the air, as it led to a more scientific approach to wildlife management inside and outside the estate, which set in motion a period of rapid growth and

development in the wildlife sector. It commenced with the expansion of tourist facilities in state-protected areas and extended to the wildlife industry outside the estate. Building on the confidence gained from 15 years of institutional evolution under the Wild Life Conservation Act 1961, the DNPWLM devolved proprietorship over most wildlife outside the estate to landholders in terms of the 1975 Act. The department was able to shed much day-to-day management of wildlife over which, in any case, it had had little direct influence, without abrogating its countrywide responsibilities for the resource. With the professional leadership advocated by the Wild Life Commission and the reduced public controversy, this allowed the DNPWLM to concentrate on managing the estate, which it saw as its key function and which it did reasonably well (MacKinnon and MacKinnon, 1986). Management of ecosystems was prioritized and based on adaptive management and included curbing dominant herbivore populations to maintain (or restore) the physiognomic character of the habitats in a state as similar as possible to that in 1900, before the increasing human population began modifying them rapidly.

The DNPWLM catalysed and benefited from the emergence and growth of an increasingly strong and influential private wildlife sector. Devolving proprietorship over wildlife to landholders allowed and encouraged them to maximize their profits from using the resource sustainably. Additional measures taken by government included incremental measures to remove artificial constraints, such as fixed hunting licence fees, which had inhibited wildlife from realizing its true market value. These were replaced by free market mechanisms such as tenders and auctions for hunting and other products offered by the state, wherever practicable. It also laid the foundations for a vigorous and successful community-based wildlife management programme in communal areas (see Chapter 13) (Child, 2000b).

With these successes, the value of wildlife and the land supporting it appreciated immediately. Benefits were felt by the resources, the responsible agency, the wildlife sector, the national economy and human welfare. The wildlife industry quickly became a significant and rapidly growing element in the national economy, creating employment and generating substantial foreign earnings. DNPWLM staff became front-runners in international conservation forums which, together with the favourable impressions of a growing number of foreign visitors and knowledgeable commentators, reflected credit on the country.

Political interference in the leadership and running of the DNPWLM was kept in check between 1971 and 1980 and for some years after Independence, but began to be felt in large measure from the mid-1980s to the early 1990s. As it gained momentum from around 1990, it accelerated the loss of skills which, incidentally, sped up the decline in services the department could offer and undermined its corporate resolve to succeed, in what became a self-perpetuating

destructive vortex attributable to poor leadership. As the leadership lost confidence in itself, it sought to restrict the freedom allowed to the private sector, and many of the actions that had stimulated growth in the wildlife sector (to the advantage of the DNPWLM) were reversed. For example, unnecessary permitting and petty restrictions were reintroduced. Predictably, as bureaucratic road-blocks were erected, transaction costs increased and growth in the sector slowed. It was further reversed following the redistribution of land that commenced in 1999, with much wanton destruction of wildlife and its habitats. Having been a global example of effective nature conservation, especially outside its well-run parks and reserves, Zimbabwe slid to become an embarrassing non-entity in conservation circles in southern Africa and beyond.

The history of the fluctuating success of nature conservation in Zimbabwe is a clear demonstration of the power of institutions and their implementation on conservation outcomes. While conservation depends on natural laws to produce valuable goods and services, it usually succeeds only if these occur in a socio-politically and economically benevolent setting. Conserving and using wildlife inside and outside parks and reserves represents two sides of the same coin. The Zimbabwean experience suggests that it is probably the single most optimistic land use for enhancing human well-being on a broad front in the arid and semi-arid lands that dominate southern Africa, much of the rest of the continent and far beyond. Unlocking this potential requires that governments get the institutions right and apply them effectively and efficiently in landholder-friendly but disciplined ways that are transparent.

Notes

1 This was an amendment by virtue of the fact that Zimbabwean common law is based on the Cape Colony statutes of 1890.
2 Rhodesia – now Zimbabwe – never had a colonial government. The British South Africa Company governed the country under a Royal Charter from Queen Victoria until 1923, when it relinquished authority to the British Dominion office.
3 Tourism grew to record levels under sanctions (when the Rhodesian government 'stamped' foreign passports on a slip of paper), until it was curbed as the civil war intensified.

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Savé Valley Conservancy: A Large-Scale African Experiment in Cooperative Wildlife Management

Peter Lindsey, Raoul du Toit, Alistair Pole and Stephanie Romañach

The Savé Valley Conservancy (SVC) is a large (3442km^2) cooperatively managed wildlife area, comprising multiple properties held by private ranchers, local councils, government and one community. The conservancy is located in the semi-arid South East Lowveld of Zimbabwe, occurring at an elevation of 480–620m, with deciduous woodland savanna, low and variable rainfall (474–540mm per annum) and poor-quality soils. The conservancy is bordered primarily by high-density communal land (of between 11 and 82 people per km^2), with some commercial agriculture to the south and east (Pole, 2006).

Settlement and the development of the cattle industry

The area that is now SVC was originally inhabited by San (Bushmen), as indicated by the presence of San rock paintings (Pole, 2006). Bantu people settled in the area in approximately AD500 and ousted the San, though the area was generally sparsely populated because of low rainfall, lack of permanent water and the danger to people and crops from wild animals (Pole, 2006). European hunters and explorers first passed through the area in the 1870s to 1890s, and the settlers in the 'Moodie Trek' in 1892, named the area 'Hell's Wood' in response to the heat, malaria and thick bush. Wildlife was abundant, with significant populations of buffalo, lion, spotted hyaena, wild dogs and many other species.

During the 1920s, the area was settled by European farmers and three large-scale private cattle ranches were developed: Devuli, Angus and Humani. The remainder of what is now SVC was 'Crown Land'. By 1925, there were

already 23,000 cattle on ranches in the area (Pole, 2006). The availability of cheap labour, abundant land and access to inexpensive livestock from stocks of indigenous cattle encouraged efforts to expand the beef industry, despite repeated outbreaks of foot-and-mouth disease (Phimister, 1978). In 1972, the remaining Crown Land in the SVC area was sold to individuals who planned to develop cattle ranches. The then Rhodesian government supported the cattle industry with direct financial assistance via subsidies, soft loans, tax concessions and support services. Further assistance to the livestock industry had been rendered in the 1970s in the Savé Valley where the Department of National Parks and Wild Life Management (DNPWLM) eradicated buffalo and most elephant to reduce the risk of foot-and-mouth disease transmission and damage to fencing respectively (Pole, 2006).

During the civil war of the 1970s, the cattle industry in the Savé Valley was impacted significantly by cattle rustling and the herd was reduced from 24,000 in 1975 to 5000 in 1979. After Independence in 1980, economic incentives from the Zimbabwean government for cattle ranching were reduced and stringent conditions were imposed by the European Community on beef exports. Concurrently, the South East Lowveld experienced a prolonged period of below-average rainfall. During those years, the ecological impacts of cattle ranching became apparent – cattle ranchers in Zimbabwe had traditionally established stocking rates based on 'average' rainfall years, which did not account for variable precipitation or competition from indigenous wild herbivores (du Toit, 2004). As a result, cattle were overstocked for decades, resulting in gully erosion, soil capping, increased run-off and the development of lower-productivity grass communities. Sensitive grazers such as reedbuck, Lichtenstein's hartebeest, tsessebe, roan and sable disappeared from the Savé Valley area completely, while other wildlife species suffered from benign neglect and subsistence poaching. Predators were actively persecuted by cattle ranchers, with the effect that wild dogs were extirpated and cheetah, spotted hyaena and lion persisted only at low densities. Protectionist policies at the time prevented landowners from utilizing wild animals occurring on their land, which effectively devalued wildlife and exacerbated population declines (Bond and Cumming, 2006).

Emerging potential for wildlife production

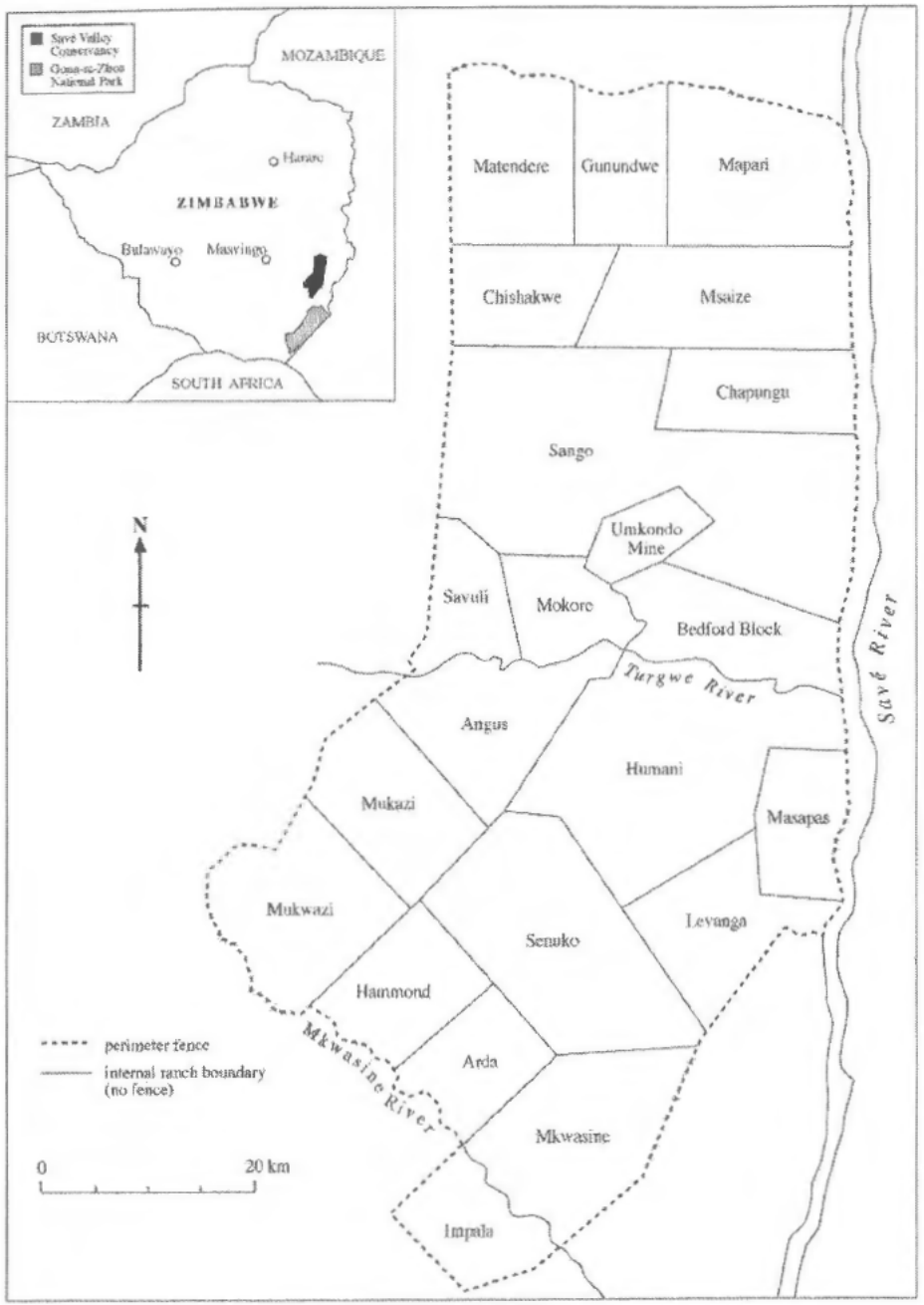
In response to declining stocks of wildlife outside the state-protected areas, the Parks and Wildlife Act of 1975 conferred 'appropriate authority' status on landowners for wildlife that occurred on their land, replacing the earlier protectionist policies (Bond and Cumming, 2006). This law effectively meant that ranchers could utilize wildlife consumptively for profit, such as through

hunting or live capture and sale. The right to generate income from wildlife coincided with an increasing realization by some ranchers of the ecological problems associated with livestock ranching. Shortly thereafter, empirical evidence of the competitive advantage of wildlife over livestock began to emerge (Taylor and Walker, 1978; Child, 1988; Bond, 1993), particularly in arid areas (Jansen et al, 1992; Cumming, 1993).

The game-ranching industry began to develop in Zimbabwe in the 1960s, initially in the form of mixed livestock and wildlife production systems, and gained momentum in the 1970s and 1980s (Cumming, 1991). In the Savé Valley, two ranches started to experiment with wildlife as a land use and one rancher (Roger Whittall, Humani Ranch) introduced some waterbuck, giraffe, nyala and white rhinoceros to complement remaining populations of bushbuck, bushpig, duiker, eland, grysbok, impala, klipspringer, kudu, warthog and zebra. In addition to plains game, small populations of cheetah, elephant, hippo, spotted and brown hyaena, leopard and lion remained in the area.

Between 1986 and 1988, 20 black rhinoceros were introduced onto Humani Ranch as part of the Government of Zimbabwe's black rhinoceros conservation strategy, under a custodianship scheme whereby ownership was retained by the state. Meetings were held between Savé Valley landowners, WWF (formerly the World Wildlife Fund) and the DNPWLM to discuss the need for cooperative management of the reintroduced rhinoceros populations. These negotiations, along with leveraged funding provided by the Beit Trust for rhinoceros conservation, led to the development of a cooperative wildlife area or conservancy. Black rhinoceros were thus the 'flagship' species that catalysed the formation of the SVC. Shortly thereafter, a constitution for the nascent SVC was developed, which enshrined the need for cooperative management of wildlife resources while ensuring the sovereignty of individual ranches (see Figure 11.1). In June 1991, 18 ranchers signed the constitution and SVC was formed. A further 13 black rhinoceros were introduced shortly thereafter, and with a high rate of reproduction this population grew to over 100 by 2004.

The Beit Trust provided funds and technical support for the construction of the perimeter game fence, on the agreement that conservancy members would remove internal game fences (thus creating extensive range for the rhinoceros), and provide match funding for wildlife restocking within a stipulated period (du Toit, 1998). This agreement ensured that all members contributed to restocking (pro rata to their ranch areas) and avoided a situation where some ranchers retained fencing around their properties to prevent the loss of wildlife to non-contributing neighbours. The agreement was made with the belief that a concerted effort at restocking would move the conservancy more quickly to a situation where viable tourism operations could be established, and where the rhinoceros would become economic assets rather than liabilities.



Source: Adapted from Pole et al (2004)

Figure 11.1 *Savé Valley Conservancy*

Following the formation of SVC, some ranchers decided to retain livestock, pursuing a mixed species production system. However, in 1991–1992, the South East Lowveld experienced the worst drought on record, forcing ranchers to sell cattle at greatly reduced prices. A major cooperative effort was made by the landowners to save grazing wildlife species by importing hay from farms on the Central Plateau. During the drought, a strategic planning meeting was held by conservancy members and a decision was taken to completely remove cattle from SVC and to develop a multi-use wildlife production system for high-quality wildlife tourism.

Development of the conservancy

During the 1990s, a series of steps were taken to foster increases in the diversity and abundance of wildlife within SVC. With further catalytic funding from the Beit Trust, a security system (including personnel) was established to protect the black rhinoceros and control bush meat poaching.

A massive wildlife reintroduction programme was initiated, perhaps the most impressive component of which was the mass translocation of elephants from Gonarezhou National Park. During the 1991–1992 drought, DNPWLM had embarked on a elephant culling programme in Gonarezhou. Seeing an opportunity to obtain elephants for reintroduction into SVC, the conservancy chairman, Clive Stockil, proposed that SVC pay DNPWLM the amount they could expect to gain from the sale of skin, meat and tusks from culled elephants for live elephants. DNPWLM accepted the offer and the SVC immediately embarked on a fund-raising campaign. After initial attempts to capture elephants individually, a method was developed that enabled the capture and movement of whole family groups. This operation was the first time that whole family groups had been captured and translocated, and involved far more elephant than any other translocation operation before or since – 533 individuals were relocated to SVC.

Because the SVC then fell into the foot-and-mouth free (or 'green') zone, and because buffalo are long-term carriers of foot-and-mouth disease, a strong case was required to convince the Department of Veterinary Services (DVS) to permit their reintroduction into the conservancy. A case was presented (Price Waterhouse, 1994) that showed objectively that wildlife had a competitive edge over livestock with respect to returns per hectare, foreign currency generation and scope for the development of economic linkages between ranches and neighbouring communities. The report also demonstrated the crucial importance of buffalo to the viability of wildlife operations. The DVS agreed to buffalo reintroductions under stringent conditions – ranchers were required to remove all remaining cattle within the area and to construct a double game

fence of set specifications (Foggin and Connear, 2003). By March 1995, the twin 350km game fences were completed, all internal fencing and remaining cattle were removed and buffalo reintroductions began.

During and following the elephant reintroduction, a major restocking programme of other wildlife species was also pursued. Twenty white rhinoceros were introduced through a donor-supported arrangement whereby local communities would receive the receipts of trade in the progeny of the reintroduced animals (du Toit, 2005). In total, 3128 individuals of 13 wildlife species were reintroduced by the conservancy members (see Table 11.1).

Table 11.1 *Wildlife reintroduced into Savé Valley Conservancy, 1992–2006*

Species	By landowners	Through the IFC[a] loan	Total
Wildebeest	688	27	715
Elephant	553	0	553
Eland	478	18	496
Buffalo	179	247	426
Zebra	326	66	392
Waterbuck	283	78	361
Sable	252	104	356
Giraffe	137	6	143
Tsessebe	79	0	79
Nyala	64	1	65
Black rhino[b]	49	0	49
White rhino[c]	30	0	30
Lion[c]	10	0	0
Total	3128	547	3675

Note: [a] International Finance Corporation; [b] black rhino were provided by the Parks and Wildlife Management Authority as part of the national black rhino conservation plan; [c] 20 of the white rhino and all of the lion were introduced in 2005, which was several years after the next most recent wildlife reintroduction

Source: Pole (2006)

Teething troubles

During the early years of the conservancy, SVC members experienced a difficult transition period where income from livestock had ceased and wildlife densities were too low for high-quality ecotourism. Safari hunting was the most important economic activity during these years and enabled the conservancy to function and develop, though the low densities of high-value species (buffalo, in particular) limited revenues. Further restocking was required to increase the viability of wildlife as a land use and to permit high-quality ecotourism and safari hunting operations. With technical assistance from the Southern African Regional Programme Office of the World Wildlife Fund (WWF-SARPO),

SVC applied to the International Finance Corporation (IFC) for a restocking loan. Following completion of an environmental impact assessment and a process of public consultation, a loan of US$1 million was approved. A stocking plan was developed and implemented, with the primary objective of increasing the diversity and the total biomass of indigenous wildlife, and an additional six species were reintroduced into SVC (see Table 11.1). Wildlife populations in SVC increased steadily in abundance and diversity during the 1990s, and revenues from ecotourism and safari hunting climbed correspondingly, facilitated by political stability and the increasing international exposure of SVC as a conservation success story.

The development of other conservancies in Zimbabwe

During the 1990s, the wildlife industry in Zimbabwe boomed, buoyed by favourable government policies and growing numbers of visiting tourists and hunters (Bond and Cumming, 2006). By 2000, an estimated 27,000km^2 of private land was used for wildlife production (Bond et al, 2004; Child, 2005), including several other large conservancies (see Figure 11.4). SVC and (later) Bubye Valley moved most quickly and completely in developing wildlife populations and replacing livestock with wildlife-based industries.

The role of individuals in the development of conservancies

The formation and evolution of SVC and other conservancies depended on several catalytic and enabling factors, and teamwork among various stakeholders. Possibly the biggest catalyst for the formation of SVC was funding from the Beit Trust, via WWF, which re-enforced the rhino conservation programme, provided technical assistance and created incentives for landholders to amalgamate their properties. Significantly, the Beit Trust funding was flexible and provided over almost a decade, ensuring the scope to adapt the support to changing circumstances. Consultants were engaged at the appropriate times in the conservancy's development to tackle emerging needs, for example, the development of a memorandum of understanding (MoU) between the SVC and neighbouring rural district councils as a vehicle for community outreach efforts. The progressive attitude of the DVS, international recognition for the rhino-breeding success and growing interest of external investors in wildlife ranching propelled the conservancy along the route towards large-scale cooperative management. Later, input from advisers helped secure the crucial IFC restocking loan and more recently key guidance during the land reform programme of the Zimbabwean government.

Criticism of the conservancy approach

The development of the game-ranching industry and of conservancies in particular, was criticized in some quarters and sometimes suffered from a lack of political support (Bond et al, 2004; Cumming, 2005). A key criticism has been that conservancies are underutilized and undermine food security by wasting land that could be used to produce crops or domestic stock (Wolmer et al, 2003, 2004). However, such criticism fails to consider that conservancies are located on land that is generally unsuitable for agriculture due to low rainfall and/or poor soils and livestock-ranching enterprises have tended to rely on external (perverse) subsidies, are generally unprofitable in semi-arid areas, and have tended to result in a cycle of overstocking, ecological degradation and declining productivity (Bond et al, 2004). By contrast, wildlife-based land uses rely on the delivery of safari hunting and tourism that generate higher revenues (in the form of foreign currency) than livestock, which can contribute to national food security (in the same way as the non-edible tobacco crop that is grown in areas of greater agricultural potential than the Lowveld). Further added value may be derived from the live sale of animals, an activity that forms the basis for a large industry in South Africa and Namibia. These returns are less tightly coupled to rainfall than meat production, and are less susceptible to drought than those from livestock farming (Bond and Cumming, 2006). Well-managed wildlife production systems also avoid the ecological degradation typical of livestock production and are thus more sustainable (Bond et al, 2004).

Additionally, there is increasing potential for the local or international sale (from foot-and-mouth disease free areas) of venison as a low fat, free range alternative to meat from domestic animals (Radder, 2002). The sale of affordable meat to local communities from trophy-hunted animals and through the annual harvest of overabundant species can also make a contribution to local protein requirements.

Additionally, a review done during the early 1990s indicated that both the volume and quality of employment opportunities is greater for wildlife production systems than for livestock, and there is no reason to believe that this situation does not hold true today (Price Waterhouse, 1994). If current trends and plans to expand SVC to amalgamate community land and to incorporate community involvement through allocation of shareholdings continue, communities will benefit from opportunities to become wildlife producers and tourism operators.

The electric fencing erected around conservancies has been criticized as representing a symbolic exclusion of impoverished communities by wealthy landowners (Wels, 2000; Wolmer et al, 2003; Spierenberg and Wels, 2006). While the concept of 'moving beyond the fences' to involve and benefit

communities from wildlife management is important, the practical significance of fencing must also be considered. In the context of 'hard edge' wildlife areas such as SVC where the boundary of the conservancy abuts densely populated communal land, perimeter fencing is vital for preventing human–wildlife conflict and uncontrolled hunting of wildlife that may wander beyond the borders of the conservancy. Furthermore, the fencing around SVC is a statutory requirement to prevent disease transmission to livestock occurring in neighbouring areas.

Ecological and financial benefits of the conservancy approach

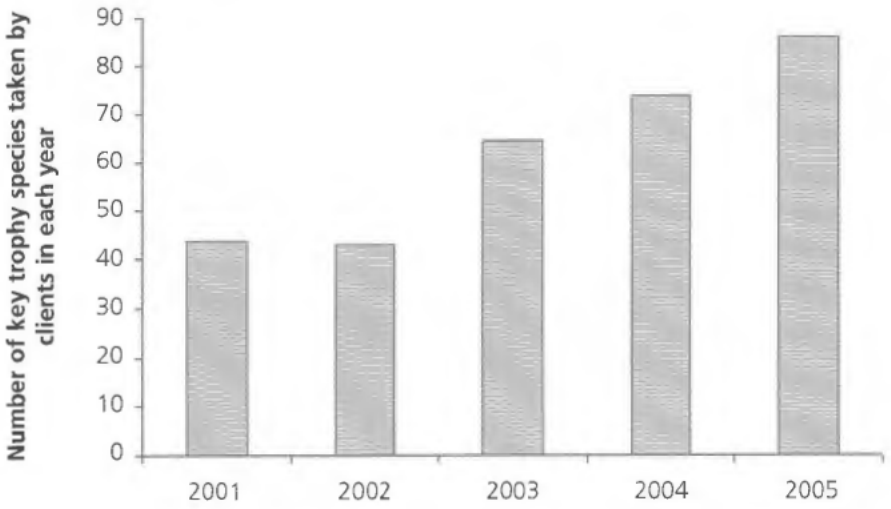
SVC illustrates both the financial and ecological advantages of scale associated with cooperative conservancy arrangements relative to isolated fenced game ranches.

Financial advantages of conservancy scale

The large size of SVC permits the reintroduction of large, charismatic species such as buffalo, elephant and lion, which are key revenue drivers for tourism and trophy hunting (see Figure 11.2) and the pooling of land units permits the marketing of a 'wilderness' experience, which is attractive to both photographic and hunting tourists (du Toit, 2004; Lindsey et al, 2007a, 2007b). The large size of SVC also permits economies of scale that reduce management costs. For example, less fencing and fence maintenance is required, fewer artificial water-points are needed, one annual census can be done for the whole area and the larger land area can support the expensive infrastructure required for high-end tourism (du Toit, 2004).

Ecological advantages of conservancy scale

The conservancy permits the effective conservation of a wider diversity of species than would be possible in smaller land units, as no single ranch encompasses the diversity of habitats found in the conservancy as a whole. The scale of SVC can enhance the resilience of the area to ecological shocks such as fires or droughts by enabling herbivores to make use of patchy primary production resulting from sporadic rainfall (Bond et al, 2004; du Toit, 2004), and by enabling the re-establishment of functional predator–prey relationships. SVC is once again home to significant populations of wild dogs, leopard, cheetah and increasing numbers of lion and spotted hyaena. Predators effectively reduce the amplitude of population fluctuations in non-migratory prey species by preventing overpopulation during high-rainfall years, which may prevent



Source: Technical Advisory Committee, SVC

Figure 11.2 *Key trophy species hunted by foreign safari clients, 2001–2005*

population crashes during droughts (Mills and Funston, 2003). Larger areas are more able to support viable populations of wildlife than isolated game ranches, and can host larger populations that are more resilient to stochastic events and are less likely to require augmentation or further reintroductions, and do not require management intervention to prevent inbreeding. Coordinated and cooperative wildlife management has largely prevented issues such as the introduction of extra-limital species, inbreeding or the intentional cross-breeding of closely related species, the breeding of aberrant colour morphs or the persecution of predators, which have reduced the conservation value of game ranching in South Africa (Bond et al, 2004; Lindsey et al, 2007a).

Conservation achievements of SVC

SVC is home to sizeable wildlife populations, including several species of conservation significance (see Table 11.2). There are now nine packs of African wild dogs, occurring at one of the highest densities of that species in the world (Creel and Creel, 2002; Pole, 2006), which had been effectively eradicated from SVC during the cattle production era. Given the high costs and low success rates of wild dog reintroductions in other protected areas, this is one of SVC's more important achievements (Lindsey et al, 2005). SVC also has the

largest rhinoceros population in Zimbabwe. Lions recolonized the conservancy from Malilangwe in the south, and the population is increasing rapidly, and the geographic distribution of elephants within Zimbabwe was boosted by approximately 6 per cent following the SVC translocation.

Table 11.2 *Minimum SVC population estimates for wildlife, livestock and human settlements*

Species	Population
Wildlife	
Impala	17,191
Zebra	5075
Wildebeest	4927
Buffalo	1785
Warthog	1426
Eland	1424
Kudu	1150
Elephant	1117
Giraffe	781
Waterbuck	735
Sable	214
Black rhino[a]	120
White rhino[a]	31
Human habitations	4027
Domestic stock	
Cattle	9986
Goats	4715

Note: [a] Known population sizes derived from ongoing monitoring

Source: Joubert and Joubert (2006)

Neighbour relations and political issues

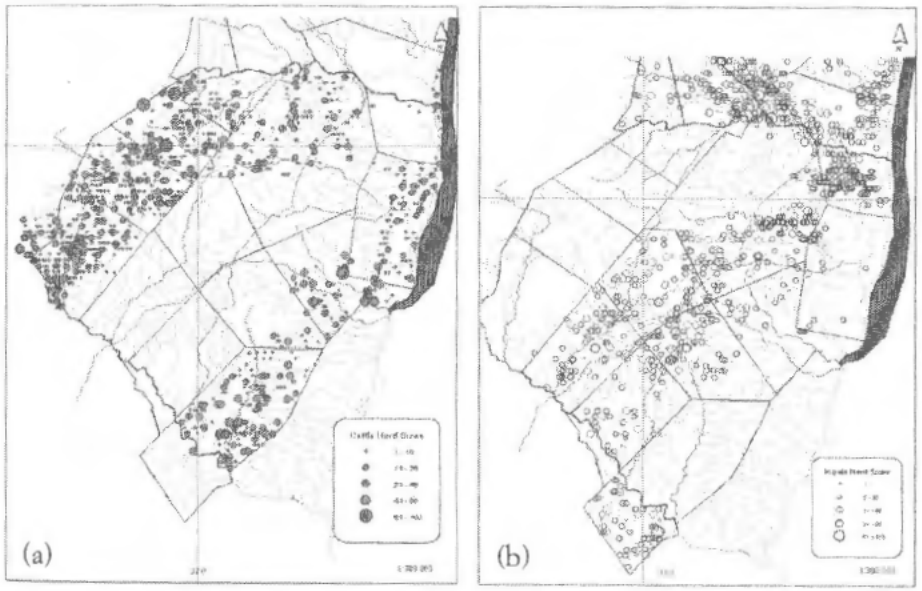
A land use experiment of the size of SVC could not be developed anywhere in the world without raising issues regarding relations with neighbours and official national policies. In Zimbabwe, the further development of the wildlife industry has been constrained by interrelated political and economic tensions. These tensions are associated with a racially inequitable landownership pattern arising from the colonial era. They were present as undercurrents (but not limiting factors) during the early 1990s when the conservancy was established by predominantly white landowners. Many of these landowners had recently bought land in the conservancy, with certificates of approval from the government, and were therefore not inheritors of colonial estates. The architects of

the Lowveld conservancies (i.e. the individual ranchers who led the process and the NGO representatives who supported the process technically and financially) were sensitive to these political undercurrents and to the need to make the conservancy relevant to the livelihoods of neighbouring communities. Prior to the Beit Trust funding the development of SVC, political assurances were formally sought and obtained at ministerial level regarding the government's approval for the development of large-scale commercial wildlife projects on semi-arid private land. Clearly, however, these assurances did not reduce the need for community outreach at the local level.

The pace of development of the SVC outreach programme was governed by several factors, of which the most significant (often overlooked by critics of the Zimbabwean conservancy initiatives) is the inevitable inertia involved when a disparate group of landowners is required to make joint decisions on land use transition. The conservancy could not simply spring into existence overnight with all economic, ecological and socio-political aspects being adequately dealt with. Some ranches within the conservancy contributed to community outreach from an early stage by providing direct assistance to small-scale projects such as irrigation schemes, scholarships and community embroidery schemes (Anderson, 2007). Community access was also facilitated on some properties to enable the controlled extraction of renewable resources such as firewood, reeds and edible caterpillars. A significant achievement of SVC community engagement efforts was the establishment of the SVC Trust in 1996. The SVC Trust arose following the signing of a formally negotiated MoU between SVC and the five neighbouring rural district councils (Bikita, Buhera, Chipinge, Chiredzi and Zaka), and has several objectives, including: 'fostering cooperation and communication between the SVC and its neighbouring communities through beneficial and durable economic relationships' (SVC Trust, 2000). The SVC Trust was established as an accountable, not-for-profit body administered by a board of trustees, comprising members from each of the councils, members of parliament, district administrators, traditional leaders and influential citizens. A key initiative of the SVC Trust is to develop a wildlife endowment scheme, where funds are raised to purchase wildlife for reintroduction into the conservancy. The progeny of the restocked wildlife would be regarded as tradable assets of the SVC Trust. In light of current negotiations, these assets are likely to be converted to shareholdings in a new business structure proposed to control the wildlife use rights within SVC and to share earnings between owners and the Trust beneficiaries.

Despite these initiatives, the overall impact of outreach efforts has been limited by the fact that the learning curve regarding community outreach was interrupted by a steep decline in political tolerance for landownership by whites in Zimbabwe. This created a risk that outreach efforts would be derailed, resulting in a lose–lose scenario, rather than a situation where both

SVC and communities could benefit. SVC reflected the problem of racial imbalance at that time – 41 per cent was owned by white Zimbabweans, 54 per cent by white foreign investors and 5 per cent by the government. Landownership was turned into a political flashpoint by the ruling party during a period of challenge by the opposition party in 1998–2000, with the result that private land, including SVC was targeted by the government's 'fast track' land reform programme. By December 2002, five ranches in SVC (Mukwazi, Mukazi, Angus, Chigwete (part of Humani Ranch) and Mkwasine) had been taken over by peasant farmers and three others (Levanga, Masapas and Senuko) were partially settled, comprising a total of 33 per cent of SVC (see Figure 11.3). Other Lowveld conservancies were also affected to varying degrees. Resettlement within SVC and the political and economic instability stemming from the land reform programme in the country as a whole has had several major impacts on SVC.



Source: Joubert and Joubert (2006)

Figure 11.3 *Distribution of (a) settlers' cattle and (b) impala in the southern half of Savé Conservancy, 2006*

Disruption of the community outreach programme

With the rights of stakeholders blurred by the radical shift in land tenure, the development of the community outreach programme was stifled. The SVC Trust was derailed because of political allegations that it had been put in place

merely as a smokescreen behind which the conservancy hoped to escape land reform.

Increases in bush meat poaching

When the settlers arrived in SVC, the game scouts were quickly prevented from conducting anti-poaching patrols in resettled areas. The last few patrols undertaken on those properties revealed massive levels of snaring for bush meat, often with wire taken from the conservancy fence. During the settlement process, approximately 80km of the double perimeter fence was removed, corresponding to 1280km of wire (enough to produce more than 420,000 snares). Between August 2001 and February 2007, a minimum of 3836 animals were killed on the ranches still run by the original owners (unpublished SVC records). Poaching levels on resettled ranches were undoubtedly much higher – aerial survey data indicates that wildlife populations in those areas have been virtually eradicated (see Figure 11.3b).

Seven years after the onset of settlement within the conservancy, levels of bush meat poaching continue to be extreme. Between August 2005 and February 2007, 2191 incidents of poaching were recorded in SVC resulting in the removal of 13,920 snares and the death of at least 1125 animals. Incidents of poaching are more than twice as frequent on ranches adjacent to resettled properties. Wildlife populations in the south of the conservancy (south of the Turgwe River) are declining, whereas those in the north, away from the resettled areas are stable (Joubert and Joubert, 2006).

Habitat destruction and loss of connectivity

Large areas of woodland have been cleared for subsistence farming within SVC. Due to the poor nutrient content of the soils, resettled farmers practise slash and burn agriculture to boost yields, resulting in the increasing land clearance. The settlement of Chigwete and Masapas ranches in the centre of SVC threatens to prevent wildlife movement between the northern and southern halves of the conservancy, and the occupation in the south-eastern part of SVC (Mkwasine and parts of Senuko and Levanga ranches) jeopardizes connectivity between SVC and the Great Limpopo Transfrontier Area (see Figure 11.4).

Disease outbreaks

By 2006, an estimated 14,700 domestic stock had been moved onto settled ranches within the conservancy (see Table 11.2 above), greatly increasing the risk of transmission of diseases between wildlife and domestic animals. The breakdown of foot-and-mouth disease controls in SVC and other wildlife areas around the country led to a cessation of beef exports from Zimbabwe to the

Source: Derek de la Harpe (pers. comm.)

Figure 11.4 *Zimbabwean Lowveld conservancies and the Great Limpopo Transfrontier Conservation Area*

European Union in 2001 (du Toit, 2004). Two outbreaks of foot-and-mouth disease have been recorded in the communal land neighbouring the conservancy since the settlement began (Foggin and Connear, 2003). In addition, in 2005, three wild dogs from a single pack in the southern part of SVC died of symptoms resembling rabies and the pack subsequently disappeared.

Subsequently in 2007, a rabies outbreak in the adjacent Malilangwe Trust resulted in the disappearance of three packs of wild dogs. Finally, a major anthrax outbreak was recorded in SVC/Malilangwe in 2004, related to the breakdown of vaccination programmes in neighbouring communal areas, attributable to the failing economy resulting from the land reform programme.

Human–wildlife conflict

The southern part of SVC now represents a mosaic of natural habitat used for wildlife production and subsistence farming, resulting in conditions conducive to human–wildlife conflict (HWC). The removal of portions of the perimeter fence by the settler farmers has greatly increased HWC in neighbouring communal lands. In SVC, the conflict has been manifested by fatal encounters between humans and wildlife (at least 40 human deaths in or near SVC due to wildlife since 2000), crop damage and livestock depredation (Lindsey, 2007). In response to crop damage, several elephant bulls are killed in problem-animal control operations every year, significantly reducing potential revenues from trophy hunting each year (Lindsey, 2007; Martin, 2007). Settler farmers living in the conservancy no longer employ traditional (conflict-reducing) husbandry techniques employed effectively elsewhere (Woodroffe et al, 2006); and as the lion population increases, complaints of livestock losses appear to be increasing in frequency, resulting in the risk of predators being poisoned by affected farmers.

Major drop in tourism revenues

With the onset of the political turbulence in Zimbabwe, revenues from tourism declined dramatically. In 1999, ecotourism was the primary source of revenue for four ranches in SVC and comprised a significant component of income on another seven properties. By 2004, all of the ranches in SVC relied primarily on income from trophy hunting. The hunting industry has proved to be considerably more resilient to political instability than ecotourism. With the onset of the land reform programme, tourist occupancy in Zimbabwe fell by 75 per cent, whereas trophy hunting revenues dropped by only 12 per cent (Booth, 2002; Bond et al, 2004). In SVC, trophy hunting revenues on the ranches not affected by land reform increased after 2000, due to increasing populations of buffalo, permitting the sale of more high-value 'dangerous game' hunts (see Figure 11.2).

Erosion of property rights dissuading investment

In 2005, the government declared that all agricultural land owned by Zimbabwean nationals belonged to the state, and white farmers continue to be evicted from their properties. Though no further evictions have occurred in SVC since 2002, the uncertainty of tenure has stifled further investment and reduced enthusiasm for the nascent community outreach initiatives. The resettled farmers in SVC face similar uncertain tenure over the properties they occupy, which, in combination with open access to natural resources has encouraged unsustainable bush meat hunting.

The future

As will be obvious from the issues outlined above, the future of SVC as an experiment in large-scale cooperative wildlife management depends greatly upon the resolution of pressures arising from the land reform programme. Specifically, the future of SVC will depend on the extent to which the conservancy can incorporate and benefit a broader range of stakeholders, especially local communities, through arrangements that retain business viability.

The government has recently reversed its stance on the resettlement of conservancies for small-scale agriculture and has stated that Lowveld conservancies will remain wildlife production zones. After a series of discussions between conservancy representatives, government officials and technical advisers, the Zimbabwean Cabinet approved a short general policy statement on wildlife-based land reform in 2005. The Ministry of Environment and Tourism has been tasked with the development of guidelines to implement this policy statement. Commencing in early 2006, under the auspices of the Ministry of Environment and Tourism, progressively more detailed discussions have been taking place within the group of government officials, conservancy representatives and non-governmental advisers. At present, various models for wildlife-based land reform have been proposed by the government, including a variety of combinations of current landholders, neighbouring communities, the Parks and Wildlife Management Authority (PWMA, formerly the DNPWLM) and indigenous entrepreneur investors.

All of these models require conservancies to engage with neighbouring communities and provide a continued role for those landowners who have not already been evicted from their ranches. A continued role for existing landholders is important, as this would enable the retention of expertise and functioning tourism operations while new entrants are eased into the industry. Since private land has been nationalized, the primary assets that remain as tradable commodities (as identified in the current policy statement) are wildlife populations. Arrangements are thus being developed to form new corporate structures that manage and trade the use rights for these wildlife assets. Shareholdings are envisaged for existing operators, for community trusts (thus the SVC Trust has regained political recognition) and for black entrepreneurs who wish to buy shares. Shares could also be acquired by adding wildlife or

land to the conservancy, which is the most feasible route by which PWMA would become a partner (notably, through the inclusion of Chipinge Safari Area, east of SVC). Large shareholders would undertake commercial wildlife operations within the conservancy, based on the wildlife use rights that arise from their shareholding. Practical requirements for the effective functioning of the SVC include the need for rational alignment of wildlife and agriculture and repairing the boundary fence where it has been removed.

These concepts are still evolving and the final form of the arrangements for wildlife-based land reform cannot be stated with certainty. However, irrespective of the composition of shareholders and of where the conservancy boundaries are re-established, SVC will need to renew its community outreach effort through measures such as those outlined below.

Developing durable business partnerships with neighbouring communities

As outlined above, the SVC Trust should be included as a shareholder in any a new corporate structure. A minimum 10 per cent shareholding for the Trust is currently envisaged and would provide dividends related to wildlife populations within the conservancy (providing the incentive for communities to reduce poaching). In addition, there is scope for SVC to be expanded to include portions of community land. Negotiations between SVC and the Nyangambe community (adjacent to Hammond ranch) have already resulted in the decision by that community to incorporate approximately 25km^2 of land into the conservancy. There are other such opportunities around other parts of SVC, despite generally high human population densities. These areas would have to be restocked by SVC, adding to the community shareholding and providing direct business opportunities for trophy hunting and ultimately ecotourism – especially those linked to cultural tourism possibilities. Finally, joint ventures could be developed, such as out-grower vegetable schemes to supply safari camps, micro-industries such as tanneries and craft production (A. Sithole, pers. comm.).

Other contributions to neighbouring communities

Communities in the South East Lowveld suffer regular food shortages due to low and irregular rainfall and the lack of irrigation (Cumming, 2005). Food shortages, increasing poverty levels and ineffective legal deterrents combine to ensure that SVC experiences severe levels of poaching for bush meat, most of which is sold locally. Bush meat poaching is extremely inefficient: for every animal successfully extracted by poachers using snares, four others are killed and not recovered. If the illegal offtake of bush meat could be replaced with a

sustainable legal source of bush meat, SVC could contribute a constant supply of protein to neighbouring communities and the impact on wildlife populations would be lower. For example, SVC could remove 50 or more elephants annually to limit population growth and obtain a supply of meat for distribution to neighbouring communities (Martin, 2007). It has been proposed that elephant meat would be granted to the SVC Trust, which could sell it at a subsidized price to local communities to generate funds for community development projects.

Developing channels of dialogue between SVC members and their neighbours

Ranch/ward subcommittees within the conservancy should be established and regular meetings should be held between ranchers, neighbouring community leaders and local politicians. These forums would enable ranchers and community members to get to know one another and enable discussion of both problems and potential avenues for cooperation.

Developing comprehensive education and awareness programmes

Education programmes are obviously important in raising awareness of conservation issues and of the potential importance of wildlife to local community development. Interviews with local communities revealed misconceptions relating to wildlife and conservation, such as the belief that bush meat poaching has no impact on wildlife populations (S. Matema, pers. comm.). During these interviews, community members have indicated that the opportunity for their children to view wildlife would constitute a valued benefit from SVC.

Conclusions

SVC is an experiment in progress and cannot yet be said to be a tested model for cooperative wildlife management in southern Africa, though it has achieved significant gains for biodiversity conservation and has the potential to act as a key contributor for local community development. These achievements and potentials are, however, dependent on a favourable resolution of the political processes under way at the time of writing in Zimbabwe. If SVC survives the political furnace in which the experiment is currently being forged, it will illustrate important lessons for other countries in southern Africa where similar challenges exist, or can be expected to arise in the near future.

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13

The performance of CAMPFIRE in Zimbabwe: 1989–2006

Russell Taylor

Zimbabwe's Communal Areas Management Programme for Indigenous Resources (CAMPFIRE) pioneered CBNRM in southern Africa. It was conceived some 30 years ago in the northern Sebungwe region where the environmental impacts of tsetse eradication programmes and associated in-migration of people onto marginal agricultural land threatened the potential comparative economic advantage of wildlife, which was still abundant in the region (Child, G., 1995). Although initially driven by a conservation agenda, it was quickly appreciated by those involved in developing the programme that a people-centred approach was needed, as were devolved governance and rural democratization processes. A number of important principles for community conservation emerged, including economic benefit, devolution and collective proprietorship for a common pool resource, wildlife (Jones and Murphree, 2001), which have been put into practice with varying degrees of success and indeed failure, and the programme continues to evolve adaptively and experimentally, with stakeholders. This chapter summarizes the progress of CAMPFIRE since its formal introduction in 1986, providing as complete an assessment as is possible with incomplete data, using several key variables to measure conservation, social benefit and governance outcomes.[1]

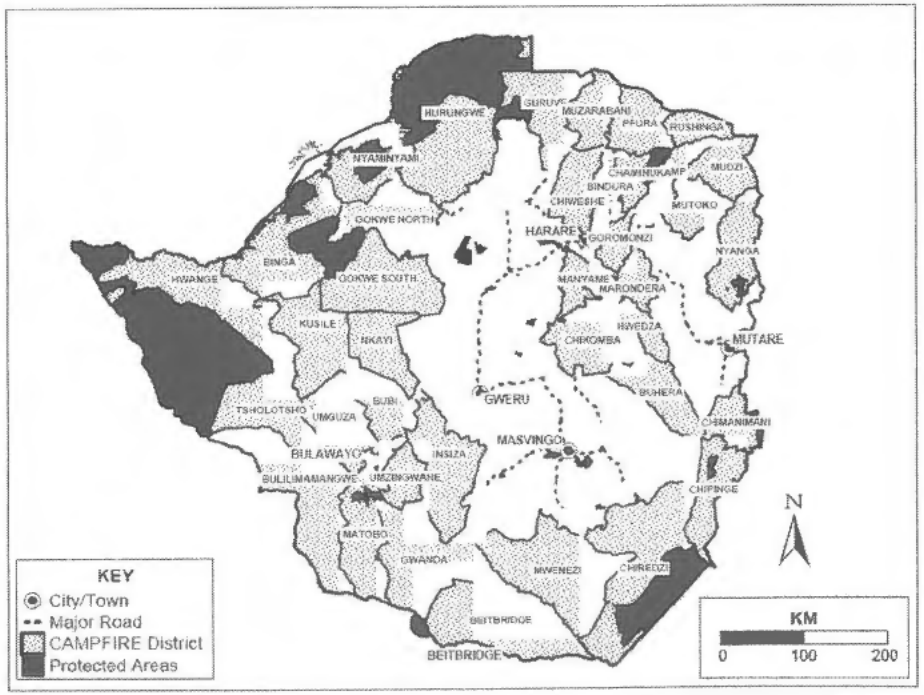
Background

Much of Zimbabwe is semi-arid, with a low and variable rainfall, making the country prone to drought. Comprised predominantly of broad-leafed deciduous miombo and mopane woodland and savanna, land use varies from intensive crop production to extensive cattle and wildlife production along a rainfall–altitude gradient. Much of the country is ecologically best suited to extensive rangeland production systems (see Vincent and Thomas, 1960) and

economic evidence suggests that wildlife is a highly competitive form of land use in drier regions (Jansen et al, 1992; Price Waterhouse, 1994).

In Zimbabwe, the protected area network comprises some 50,000km² or 13 per cent of the country, situated mostly in the lower-altitude, poor-rainfall areas around the periphery of the country (see Figure 13.1 and also Chapter 5). An equivalent area of 40,000–50,000km² of communally occupied land is either adjacent to or near protected areas where wildlife populations are relatively abundant. Wildlife is typically more abundant especially where human population density is low (less than 10 people per km²) and wildlife habitat (more than 50 per cent of land area) is intact (Taylor, 1999). It is in these less developed, more remote areas, that CAMPFIRE was initially implemented in the late 1980s.

The programme was designed by the then Department of National Parks and Wild Life Management (DNPWLM), now the Parks and Wildlife Management Authority (PWMA) in the mid-1980s (Martin, 1986). It is a long-term programmatic approach to rural development that uses wildlife and other natural resources as a mechanism for promoting devolved rural institutions and improved governance and livelihoods (Child et al, 2003). The cornerstone of CAMPFIRE is the devolution of rights to manage, use, dispose of and benefit from natural resources.



Source: WWF-SARPO (2008)

Figure 13.1 *Zimbabwe's CAMPFIRE districts*

As originally envisaged, CAMPFIRE was to focus on the conservation and exploitation of four natural resources: wildlife, forests, grazing and water. Because wildlife is able to provide direct and immediate tangible financial benefits, the initial success of the programme was premised on the utilization of large mammal wildlife resources, mostly through high-value trophy hunting safaris. Subsequently, CAMPFIRE continued to focus more on the consumptive and non-consumptive use of large mammals rather than other natural resources. However, it has been able to diversify its resource management activities somewhat to include non-consumptive tourism ventures, timber and bamboo harvesting, honey and fruit production, trout fishing, the production of edible mopane caterpillars and the sale of non-renewable resources such as river sand for construction purposes.

Institutional arrangements

The PWMA is the legally mandated authority responsible for wildlife resources in the country. The 1975 Parks and Wild Life Act decentralized state authority and conferred privileges on owners or occupiers of alienated land as custodians of wildlife, fish and plants. Private landowners or land occupiers were designated 'appropriate authority', giving them de facto responsibility for wildlife and making them the beneficiaries of sound wildlife conservation and use. After 1980, similar rights were extended to communal farmers through an amendment to the Act in 1982, which delegated appropriate authority (AA) to rural district councils (RDCs). In practical terms, AA represents the decentralization of authority and control over wildlife to RDCs only (Murombedzi, 2001), and this has had important implications for CAMPFIRE.

Funding and other support

At the time CAMPFIRE was designed, donor aid was uncommon in Zimbabwe and the early establishment of the programme was characterized by a relatively low level of external funding (Child et al, 2003). DNPWLM originally envisaged government funding through a public sector investment programme to initiate CAMPFIRE, with these funds ultimately contributing to the creation of a rural sector economy based on wildlife production. Furthermore a CAMPFIRE agency under an appropriate ministry was also planned, for which short-term donor funding would have been sought (Martin, 1986). Thus funding mostly followed, rather than led, the programme.

Technical and other support was provided by a coalition of support agencies including Zimbabwe's Centre for Applied Social Sciences, Zimbabwe Trust, WWF and the Ministry of Local Government, Rural and Urban Development. The inputs of these organizations were coordinated by the

CAMPFIRE Collaborative Group under the leadership of DNPWLM and, later, the CAMPFIRE Association. The collaborative group was replaced in 1994 by the CAMPFIRE Service Providers. This local support was supplemented by funding primarily from the United States Agency for International Development (USAID), but also the WWF Multispecies Animal Production Systems Project and the Norwegian Agency for Development Cooperation.

Implementing CAMPFIRE

In the process of implementation, a number of strongly interlinked principles embedded in the original design have contributed significantly to the evolution of CAMPFIRE policy and practice (Jones and Murphree, 2001).

Economic benefit

The underlying assumption regarding the motivation for the sustainable utilization of wildlife outside of protected areas in Zimbabwe since the 1960s has been that economics ultimately determines decisions regarding the allocation of land and the resources thereon. The early success of policy promoting the high economic and financial value of wildlife, a key incentive for its sustainable management on freehold land, provided compelling arguments for its wider application in the communal sector of the country, particularly after 1980. In the context of rural development and CAMPFIRE, placing wildlife in the realm of economics and land use, rather than conservation (Jones and Murphree, 2001), provided an important opportunity to complement conventional and subsistence agricultural practices in the communal lands of the country. (This may mean, however, that wildlife could be displaced by other more viable forms of land use at some time in the future.)

Devolution[2]

Devolution of responsibility for the management and use of wildlife (coupled with alternative economic opportunities and incentives for rural development) was intended to better serve wildlife conservation given the inadequate government resources to do so outside of protected areas. It was formalized in the 1975 Parks and Wild Life Act and amended in 1982, and devolved responsibility was initially granted to nine RDCs in 1989 and 1990. Those involved in the development of CAMPFIRE recognized that long-term success depended on further devolution to sub-district levels, even to a community-level institution. However, the absence of any legal persona below the level of RDC obliged DNPWLM to decentralize administrative authority and legal rights to

wildlife to RDCs, on condition that rights and benefits were to be further devolved to what were termed 'producer communities'.

Collective proprietorship

While the transfer of proprietorial rights, together with the financial incentives, was highly successful on commercial farmland, replication in communal lands faced numerous legal and institutional impediments. What was required was a communal property regime behaving as a proprietorship unit over land and resources, which comprised a defined group collectively managing and exploiting common pool resources within a defined jurisdiction (Jones and Murphree, 2001).

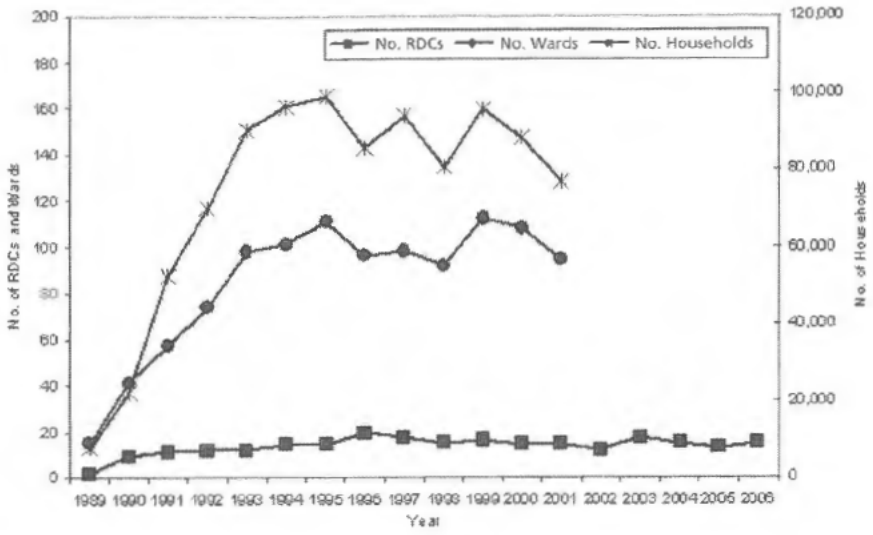
In the event, ward-level producer communities emerged through the establishment of Ward Wildlife Management Committees (WWMCs) or Ward Wildlife Committees (WWCs).[3] These village-elected committees were formally constituted with a membership comprising a chairperson, secretary and treasurer and others, with or without a specific portfolio or responsibility. The chairperson represented his/her ward on the District Wildlife (or Natural Resources) Committee, a subcommittee of the district council. Although in effect the new committees were subcommittees of local government units (Murombedzi, 2001), one of the difficulties they faced was the perception that they were 'parallel' institutions to already existing ward and/or village development committees, and thus potentially competitive or even subversive.

Participation and implementation

In 1988, two RDCs in the Zambezi valley, Guruve and Nyaminyami, were granted AA status and commenced earning revenue by marketing trophy hunting quotas to international safari hunting clientele. The first two RDCs were rapidly followed by another seven districts requesting AA status. By 1992, 12 RDCs had acquired AA, and by 1996 there were 19 CAMPFIRE districts (see Figure 13.2).

The CAMPFIRE Association was formed in 1991 to lobby for and promote the role of communal land wildlife producers. This gave CAMPFIRE an important level of political legitimacy and an ability to play a proactive advocacy role locally and internationally. Its membership, however, has remained the RDCs and not the true wildlife producer communities at a sub-district level.

Following major donor inputs for building and strengthening institutional capacity and natural resource management micro-project development, 37 RDCs had AA status by 2001. However, many were not traditional wildlife-producing districts – 19 districts (51 per cent) generated income for



Note: * As reflected by those RDCs granted AA

Source: Unpublished WWF-SARPO data

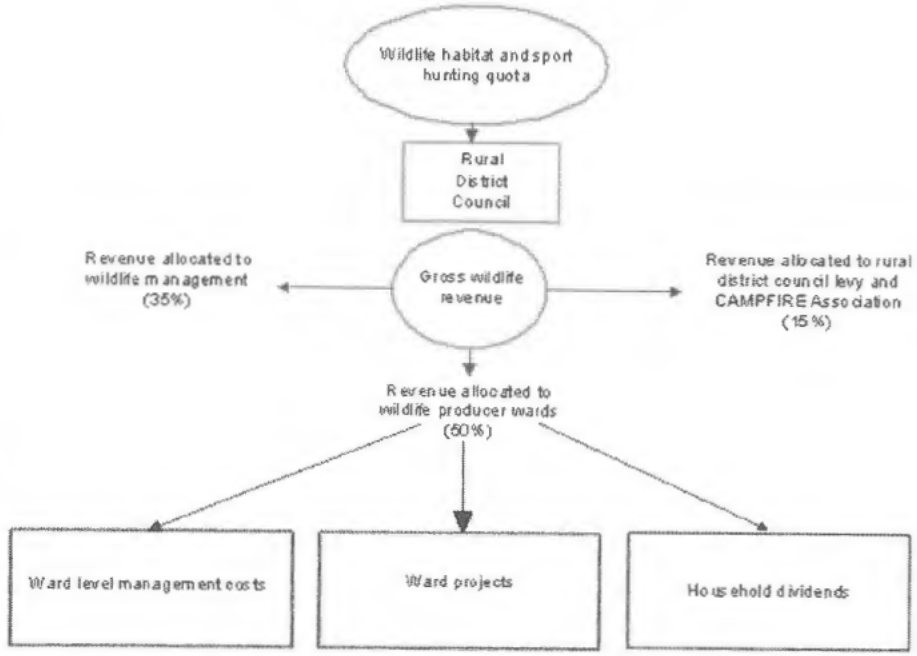
Figure 13.2 *Numbers of participating wildlife-producing communities**

communities through sustainable natural resource management activities and received benefits in terms of funded projects, training and membership of the CAMPFIRE Association (i.e. were considered to be 'fully participating'). Over 70 per cent of the 271 wards and 1217 villages in these 19 districts could be considered also as fully participating producer communities.

The CAMPFIRE model

Sport hunting and tourism provided the primary economic and financial basis for the implementation of CAMPFIRE between 1989 and 2006. Although there is considerable biophysical and socio-economic variability between RDCs with AA status, Bond (2001) described a general model for the income or revenue earned from the use of wildlife and the subsequent allocation of this income (see Figure 13.3). Consumptive (sport hunting) and/or non-consumptive tourism rights are leased to private sector operators by the RDC, with lease conditions determined primarily by the RDC and negotiated with the safari operator.

Decentralization has encouraged the application of market-based mechanisms by RDCs and greater efficiency of resource use by safari operators (Bond, 1999). Lessees pay all their fees to the RDC but the level of involvement



Source: Adapted from Bond (2001)

Figure 13.3 *The CAMPFIRE financial model for revenue generation and allocation*

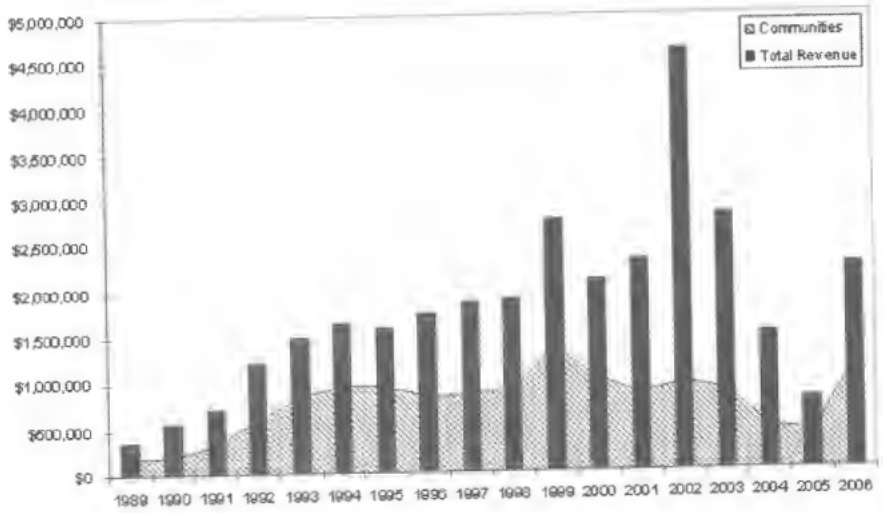
of sub-district community representatives in the lease allocation process, though variable between districts, generally has been minimal (Bond, 2001; Jones and Murphree, 2001).

Revenue earned is allocated to district council levies, district wildlife management activities and to wildlife producer communities as represented by wards. While the breadth and depth of wildlife management activities varies between districts, most have a small core team of personnel who undertake law enforcement, problem-animal management and wildlife monitoring. Income allocated to communities through WWMCs is intended to provide the financial incentive for households to participate in the collective management of wildlife (Bond, 2001). Wards have chosen to allocate revenue to resource management (salaries for resource monitors, allowances for committee members, fence repairs and maintenance), projects (grinding mills, schools, clinics) and household dividends in the form of drought relief (Taylor and Murphree, 2007) or uncommonly, cash.

Revenues raised and distributed

Between 1989 and 2006 the income to RDCs with AA totalled nearly US$30 million (ZW$390 billion).[4] Some 90 per cent of this income (US$26.8 million) was earned from the lease of sport hunting rights to commercial safari operators. The remaining income came from the lease of tourism rights (2 per cent or US$541,000), ivory sales and sale of hides (4 per cent or US$1.3 million) and other minor resources such as crocodile and ostrich eggs and firewood (4 per cent or US$1.3 million).

In 1989, when only two RDCs had AA and were operational, annual income was US$350,000 (ZW$750,000). In 1999, income exceeded US$2.75 million following a one-off sale of elephant ivory approved under the Convention on International Trade in Endangered Species (see Figure 13.4). In 2002, exchange rate distortions at the time reflect total CAMPFIRE income as US$4.6 million (ZW$255 million), which is unrealistically high. In 2006, income was over US$2 million (ZW$365 billion), at which time only 15 (out of 23) wildlife-producing RDCs were providing financial data, or indeed earning income.



Source: Unpublished WWF-SARPO data

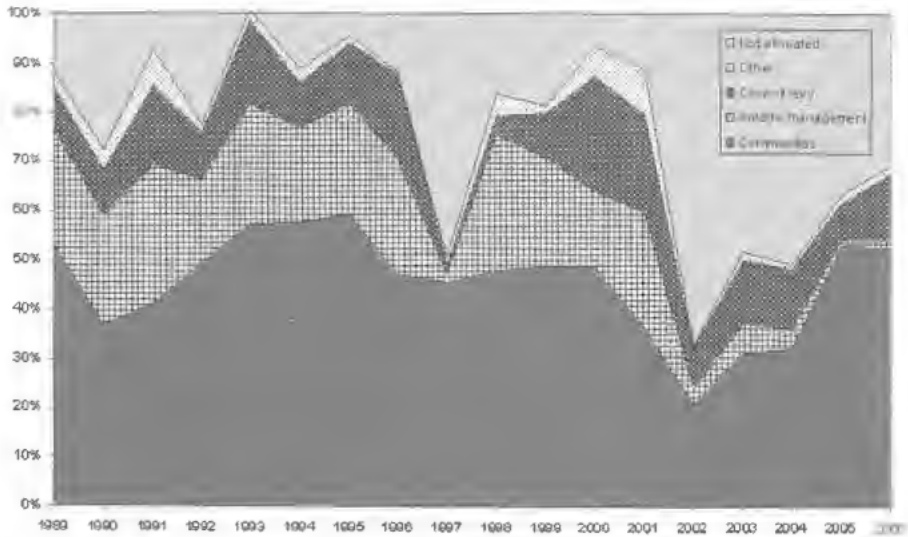
Figure 13.4 *CAMPFIRE wildlife revenue, 1989–2006 (US$)*

Bond (2001) defines five categories for the allocation of income earned from wildlife by RDCs. Councils with AA are not legally obliged to devolve income to sub-district levels but are encouraged to do so by a set of guidelines, originally developed by DNPWLM in 1991. More recently, the guidelines have

been revised and endorsed by the CAMPFIRE Association in its financial management manual (Anon, 2003). These seek to ensure that producer communities are the primary beneficiaries of the income earned and recommend that at least 50 per cent of gross wildlife income should be devolved to ward level, up to 35 per cent can be retained for wildlife management purposes at RDC level and no more than 15 per cent should be retained as a council levy.

The allocation of income over the past 18 years has been somewhat variable and not always satisfactory in terms of the revenue guidelines (see Figure 13.5). Even wildlife-rich and well-endowed districts have been unwilling to devolve the recommended 50 per cent of income earned to wards and households (Taylor, 1994). The declines in distribution to sub-district levels can be attributed largely to the declining economic condition of the country, associated exchange rate distortions and the unwillingness of cash-strapped RDCs to disburse scarce financial resources. Following a meeting called by PWMA to remind RDCs of their obligations, the proportion increased again in 2005 and 2006. This subsequently led to agreement in 2005 where safari operators pay the proportion due to the wards directly into ward-level bank accounts.

On average, 52 per cent has been disbursed to community level over the past 18 years (see Figure 13.5). Some 14 per cent of income (US$3 million) remained unallocated between 1989 and 2001, increasing to US$9.1 million (31 per cent) since and matched by a dramatic decline in allocations to district-level wildlife management activities. Unallocated revenue is generally assumed to have been committed to activities not related to wildlife and CAMPFIRE (Bond, 2001).



Source: Unpublished WWF-SARPO data

Figure 13.5 *CAMPFIRE revenue allocations, 1989–2006*

While there has been diversification beyond wildlife into tourism and other natural resource products, a number of RDCs have treated income from these activities as general revenue. These income-generating activities may have provided as much as 30 per cent more revenue than is reflected in the CAMPFIRE accounts (PwC, 2001; Child et al, 2003), and most if not all failed to reach communities. While average household benefits are low there is, nevertheless, site-specific variability around these values, with households in resource-rich areas with relatively low human population densities receiving considerably more income than the long-term national average.

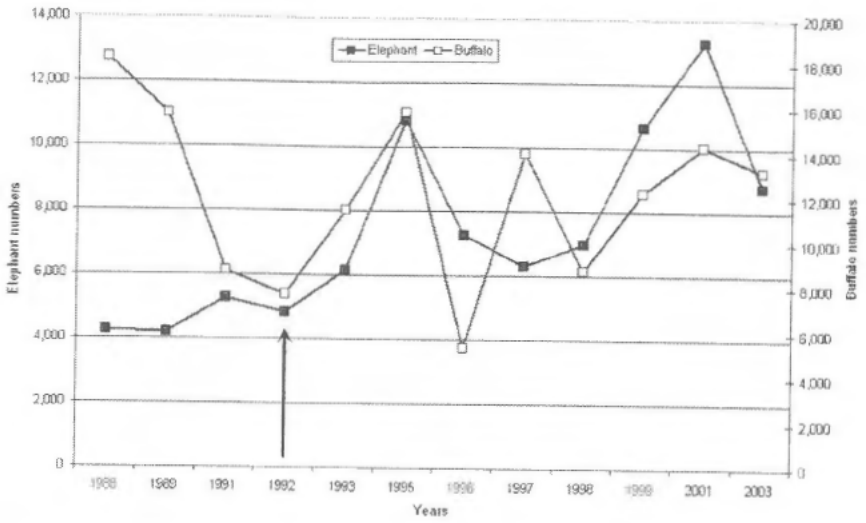
Biodiversity impacts

Impact on wildlife populations

Despite available aerial census data being uneven across CAMPFIRE districts, available data are adequate for the purposes of indicating broad trends in elephant and buffalo populations for 8 of the 12 primary wildlife producing districts (see Figure 13.6). These two species are considered here as they make significant contributions to CAMPFIRE revenue generation (through trophy hunting).

The estimated mean number of elephants was 6840 at a density of 0.43 animals per km^2, ranging from a minimum of 4181 in 1989 to a maximum of 12,707 elephants in 2001. Densities are approximately half or less those found in state-protected areas, but consistent with the maintenance of woodlands and healthy habitats for other wildlife populations (Cumming et al, 1997). These results also conform to increasing national and regional elephant herds that have grown at an average of 4–5 per cent per annum over the past decade or more (Price Waterhouse, 1996; Blanc et al, 2005).

Due to sampling difficulties, estimates of buffalo numbers tend to be highly variable (Taylor and Mackie, 1997) and buffalo are not present in all wildlife districts. The mean number estimated was 12,042 buffalo at a density of 0.96 animals per km^2. This is low for the southern savannas and numbers may have been influenced by a regional rainfall deficit, coupled with periodic droughts in the Zambezi valley and the South East Lowveld, particularly during the early 1990s (Foggin and Taylor, 1996), resulting in substantial wildlife die-offs. As a general observation, elephant numbers have increased in CAMPFIRE areas and buffalo numbers are either stable or have declined slightly over those 14 years.



Note: The arrow indicates the severe drought of 1992

Source: Unpublished WWF-SARPO data

Figure 13.6 *Elephant and buffalo numbers for CAMPFIRE areas, 1988–2003*

Quota offtakes and trophy quality

The value of big game trophies has been maintained or increased in CAMPFIRE areas, the consequence of improved marketing (Child, B., 1995; Child et al, 2003) and more effective trophy hunting and monitoring systems. Although national quotas and actual offtakes for elephant and buffalo increased between 1992 and 2002, trophy quality (as opposed to animal numbers) for these two species has been declining. For lion and leopard, offtakes have either declined or are stable, while trophy quality is stable for leopard and increasing for lion. There is also a strong correlation between increasing quotas, declining trophy quality and increased 'catch effort' (Grobbelaar and Masulani, 2003).

There has been a noticeable shift in DNPWLM quota-setting policy in the latter half of the 1990s. Quotas had initially been set to maximize returns, but around 1996 there was a switch in emphasis to more sustainable trophy quality, resulting in a reduction of most quotas. This shift may be linked to the growing acceptance and adoption of a participatory approach to quota setting and monitoring (Taylor, 2001), successfully initiated in CAMPFIRE areas, which emphasized the adaptive management of quotas in response to indices of animal abundance, trophy quality, community monitoring, illegal offtakes and safari operator 'catch effort'.

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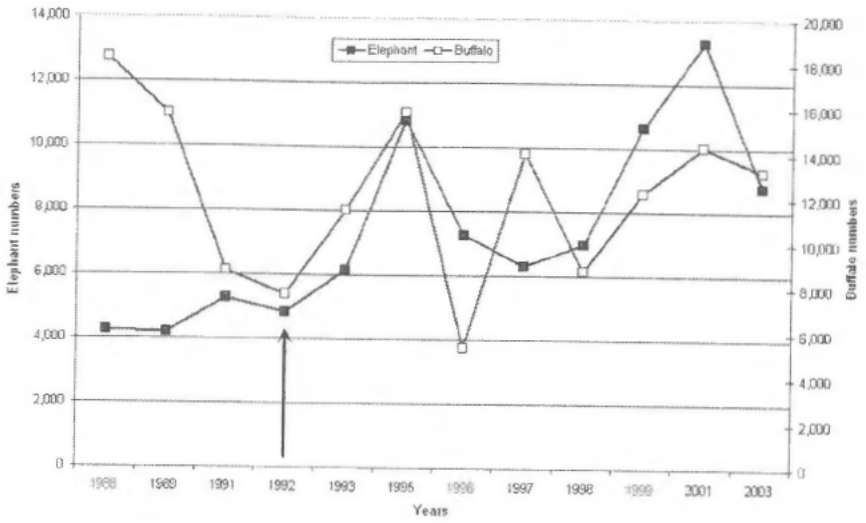

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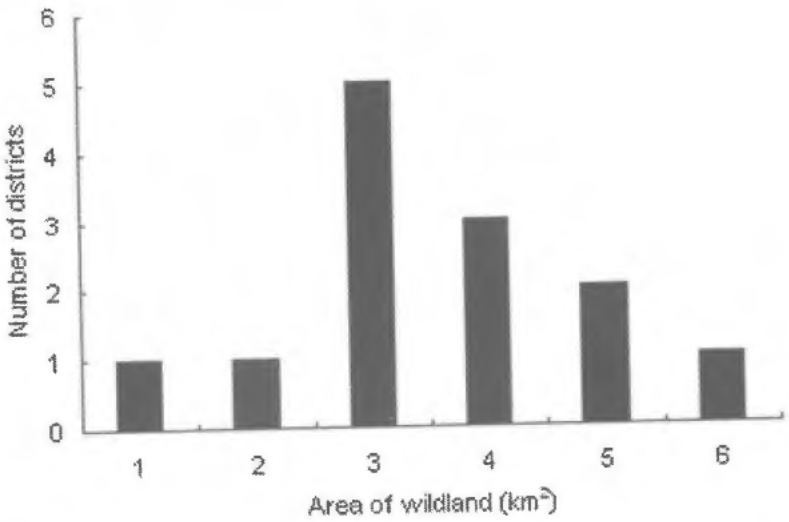
Maintenance of wild land and wildlife habitat

An assessment of the likely extent of wild land and habitat within CAMPFIRE areas was undertaken that used wildlife-producing wards as a proxy for this land, recognizing that such wards comprised a mosaic of wild and settled land (Taylor, 1999). On average wildlife producer wards made up 36 per cent of the total number of wards in CAMPFIRE districts, with their land area of 39,580 km² constituting 55 per cent of the total area under the programme.

For 12 primary wildlife districts the amount of wild land varied from less than 500 to over 5000km² with an average size of 3300km² (see Figure 13.7). Of these, three districts had wild land in excess of 90 per cent of the district area, six had 50–70 per cent wild land and in three districts only, less than 35 per cent of the district constituted wild land.



Source: Taylor (1999)

Figure 13.7 *Distribution of wild land in CAMPFIRE areas*

The availability of wild land is negatively correlated with human population density, that is, the maintenance of wild land (greater than 50 per cent of area) is more likely under lower rather than higher population densities (less than 10 persons/km²) (Taylor, 1999). At a coarse scale of resolution, these results suggest that wild land has been maintained in an intact state. Conybeare's (1998) study in three areas of the Zambezi Valley would seem to support this, with just 2 per cent of wild land lost between 1989 and 1997. This also has implications for potential household earnings from wildlife with those areas

sparsely populated and with relatively high wildlife densities standing to benefit more (Bond, 2001; Murombedzi, 2001).

Examination of habitat quality on a much finer scale, established for three Zambezi Valley districts following the commencement of CAMPFIRE in 1989, shows that the amount of habitat destroyed remains stable, though good quality habitat decreased in two out of three districts. In Nyaminyami District, good quality habitat actually increased; in Gokwe North, habitat has been maintained in the wildlife corridor as show in Table 13.1, even though elsewhere this district has lost most of its natural vegetation (Dunham et al, 2003).

Table 13.1 *Habitat quality changes over time in three CAMPFIRE districts, 1981–1999**

Habitat quality defined from the perspective of elephant cow herds		District and year								
		Nyaminyami			Binga North			Gokwe North		
Habitat quality	Defined as	1981	1993 %	1999	1981	1993 %	1999	1981	1993 %	1999
1. Habitat destroyed	Settlement/ cultivation	5	18	16	16	23	23	27	57	57
2. Poor quality habitat	Natural vegetation inside 2km buffer zone around settlement/cultivation	30	42	27	42	44	55	43	34	40
3. Poor quality habitat	Natural vegetation patch outside buffer zone but <57 km²	1	2	<1	0	<1	2	<1	<1	1
4. Good quality	Natural vegetation	63	38	57	43	33	21	30	8	2

Note: * Values are the percentages of each district that were in each habitat category

Source: Dunham et al (2003)

While causality is difficult to demonstrate, there is some indication that the loss of natural habitat may have been slowed in these wildlife-producing CAMPFIRE areas. Further work is required on the effects that people have on the spatial distribution of wildlife, especially those species that contribute significantly to CAMPFIRE revenues, notably elephant and buffalo (Dunham et al, 2003).

Governance

From the inception of CAMPFIRE to the mid-1990s, the amount and proportion of revenues devolved to producer communities increased rapidly, providing the primary impetus for wildlife conservation and for improvements in community institutional development and governance. Subsequently, the rate of devolution levelled off and after 2000 the process reversed itself (Child et al, 2003). Nevertheless, by 2003 the concept and level of devolution in many districts was still relatively strong, with a strong correlation between fiscal devolution and institutional development (Zimbabwe Trust, 2003), despite the high level of taxation imposed on producer communities by RDCs through their various levies. More recently, some wards and village collectives, notably in Chiredzi, Chipinge, Guruve and Nyanga districts, have begun to negotiate directly with safari operators and other private sector partners, resulting in payments of hunting and other tourism revenues direct to ward level.[5] Some RDCs, especially their technical staff, tend to support such innovation, even if only implicitly, recognizing their own limitations and inability to overcome the revenue retention problem, which is largely political in nature.

One of the more notable achievements of CAMPFIRE has been the strength of institutional development at the producer community level (Child et al, 2003). However this does need some qualification. While the use of wildlife dividends has been decided democratically in some instances, this has not always been the case. Likewise, some projects have been implemented properly and finances managed transparently, but not everywhere. Variability, in locality and over time, should not be unexpected in processes of institutional change.

In excess of 100 democratically elected and constituted village and ward CAMPFIRE committees exist in 23 districts, which provide for a high level of community participation and decision making with a transparent flow of information relating to key issues, planning and projects. These committees have been equipped with basic organizational skills and the fundamentals of project and financial management. Community leadership and locally employed natural resource monitors have also gained a number of wildlife management skills including counting wildlife, setting quotas, monitoring hunting, marketing wildlife and undertaking problem-animal mitigation measures.

Assumptions for the success of CAMPFIRE as an innovative CBNRM model

It is pertinent to examine the assumptions and external factors underlying the success or otherwise of CAMPFIRE. A review of the assumptions identified as necessary for the successful implementation of CAMPFIRE (see Table 13.2) indicates that at least three are largely unfavourable for CAMPFIRE (Wright, 1998; WWF-SARPO, 2003).

Recent developments

Cessation of USAID and other funding for CAMPFIRE in 2003 coincided with larger macro-level policy changes in Zimbabwe after 2000, the most significant being the implementation of the government's land reform process (Marongwe, 2002) and the subsequent adverse socio-economic conditions that resulted.

The maintenance of a foreign sport hunting market has been important for CAMPFIRE, though national-level hunting revenues have declined (see Booth, 2002). Small-scale communally managed tourism projects have not fared as well, as many of these initiatives came on line at precisely the time that Zimbabwe's foreign tourism industry began to decline. Domestic tourism has also been negatively affected due to inflation and fuel shortages.

In the absence of major donor funding and in the face of economic hardships, two case studies were made during late 2006 and early 2007 of two CAMPFIRE community projects at Masoka (Guruve District in the mid-Zambezi valley) and Gairezi (Nyanga District in the eastern highlands) (Taylor and Murphree, 2007). Some of the more important observations and unexpected results are provided below.

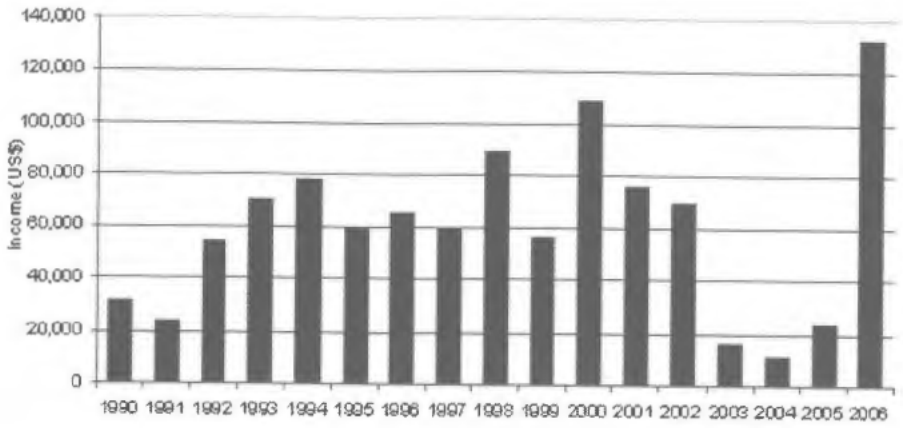
Masoka

Masoka was the first community in Zimbabwe to inaugurate a natural resource management regime for local development under CAMPFIRE and largely conforms to the CAMPFIRE model as originally envisaged, when external donor aid was relatively uncommon (as it is presently). The community has received no donor support since 1989 (when donated funds helped to construct an electrified game fence around the original settlement area). Since 2003, substantial hunting revenues had been appropriated by the RDC, imposing a grossly unfair tax on Masoka. In 2005, the Masoka WWC, with strong community support, challenged the Guruve RDC, the contracted safari operator and the CAMPFIRE Association over this issue. Following acrimonious exchanges with the RDC, an agreement was made between the community, council and the safari operator whereby all income legitimately due to the community (i.e. no less than 50 per cent) would be paid by the safari operator directly into the Masoka Ward bank account. Consequently an all time low of US$11,437 received in 2004 was followed by a dramatic rise to US$132,522 in 2006, a tenfold increase in income (see Figure 13.8).

Table 13.2 *Assumptions and indicators for CAMPFIRE*

Assumption	Area of indicator	Indicator	Comment
1. Continued government commitment to devolve CBNRM to local levels	Changes in policies for wildlife, forestry and other natural resources	Wildlife policy and legislation. Forestry policy and legislation. Land policy and legislation	No substantive revision of natural resource legislation or defined legal framework for devolved natural resource management in communal areas. Policy remains fragmented and largely centrally controlled.
	DNPWLM/PWMA have personnel and other resources for their CAMPFIRE projects	DNPWLM/PWMA real budget (US$)	DNPWLM/PWMA budgets reduced from about US$200 per km² to about US$10 per km² over past 20 years
2. Favourable market environment for CAMPFIRE products and/or services exist or are maintained	Demand for CAMPFIRE products and services maintained or expanded	Total number of days of sport hunting per annum. Gross value of sport hunting per annum. Trophy fees paid for key species at the Zambezi Valley auction hunts	Number of tourists, including sport hunters and associated revenue declined dramatically with land reform-related political instability. Declines, followed by an increase in trophy fees since 2001 requires further analysis
3. No extreme climatic conditions	Frequency and distribution of droughts and other extreme climatic events	Mean annual rainfall	No clear links between nine years of below average (five drought years) and five years above average rainfall (three flood years) and CAMPFIRE performance and/or land use change. Nevertheless, food shortages are common in most CAMPFIRE districts on an annual basis
4. Favourable macro-economic environment prevails	Macro-economic performance maintained or increased	Changes in gross domestic product (GDP) (1990–2001). Changes in per capita GDP (1990–2001)	GDP shrank from US$8.4 million in 1996 to US$3.3 million in 2001 with GDP/capita constant from 1991 to 1997 at about US$700. By 2001 GDP/capita had declined to about US$238.
		ZW$:US$ exchange rate (1990–2001)	Between 1990 and 1997 the value of the Zimbabwe dollar declined from ZW$2.47 to ZW$12.44 and to ZW$55 in 2001, when it was fixed.
		Proportion of total population in formal employment (1990–2001). Real wages (1990–2001)	The proportion of the population in formal employment declined from 14% in 1980 to less than 9% by 2001. Real wages are less than 50% of those paid in 1980

Source: Adapted from WWF-SARPO (2003)



Source: Taylor and Murphree (2007)

Figure 13.8 *Masoka CAMPFIRE revenue, 1990–2006*

The significance of this development cannot be underestimated. Although no legislative change has been made, and although council deductions could still be considered exorbitant, Masoka now has 50 per cent of its earnings paid directly into its bank account at predictable quarterly intervals. Nyaminyami District immediately followed suit and at the 2007 CAMPFIRE Annual General Meeting, all wildlife-producing districts supporting safari hunting agreed to the 'direct payments' system (Jonga, pers. comm.).

It could be argued that a very different picture might have emerged had the more favourable macro-economic conditions of the 1990s persisted (Taylor and Murphree, 2007). The declining performance of the country's economy in the intervening period has had the effect of forcing a level of self-sufficiency, resilience, adaptability and partnership that has enhanced performance beyond expectations. While this is undoubtedly linked to earlier investments in empowerment and capacity-building, local knowledge of what the revenue distribution guidelines required, coupled with strong leadership and representation played a role in forcing the hand of RDCs.

Gairezi

A fly fishing lease runs along a short length of the Gairezi river, within the Gairezi Resettlement Area, the residents of which had always been involved in the protection and management of the river and its immediate environs for both conservation and local benefit. In 2003, following the formation of the

Gairezi Development Trust (the successor of the Gairezi River Protected Area Committee), a Memorandum of Agreement was drawn up between the Trust, the Nyanga RDC and the Nyanga Downs Fly Fishing Club (NDFFC) governing their rights and responsibilities in an ecotourism project that was to be developed, based at least initially, on trout fishing. According to the memorandum, the devolved management authority for natural resources in the Gairezi River Protected Area by the RDC to the Trust is unprecedented.

By 2007, the Gairezi enterprise had become a well-run project with the NDFFC playing a key role. Overall financial returns to the community have been modest by comparison with wildlife income from sport hunting in areas like Masoka. Before the Trust was established, the NDFFC had made annual cash payments to the community around of ZW$4500 per annum, equivalent to ZW$20–25 per member. In 2004 the payment was raised to ZW$10,000,000, which at that time was a substantial improvement. The income earned over the past three years, an annual average of US$4000, suggests that the project is earning in the order of at least US$250 per km^2 or US$1.50–2.50 per ha from this part of the Gairezi river. The financial return to households, albeit modest, is threefold that of CAMPFIRE nationally.

In 2005, the Trust suggested to the NDFFC that members would prefer to receive payment in fertilizer, difficult for Gairezians to obtain and transport, which was subsequently purchased and delivered by the NDFFC. This highly practical mode of revenue distribution clearly made a great impact. Higher yielding fertilized maize fields contrasted strongly to those without treatment. On fertilizer delivery alone, the Gairezi project was perceived as a success in 2006 and 2007 by community members (Taylor and Murphree, 2007).

Conclusions

One of the more important contributions of CAMPFIRE in Zimbabwe has been the lesson that fiscal devolution can lead to improved rural democratization, governance and natural resource management (Child et al, 2003). Democratization takes place in different contexts and on the basis of people's experience and estimates of who can best represent their collective interests. Thus in Masoka for example, people look for a corporate profile of leadership that can deliver effective management and guard their collective interests against internal and external sectional greed (Taylor and Murphree, 2007). However, there is always the danger that rights could be withdrawn or that internal success in corporate solidarity could lead to avarice in the leadership. Thus where devolution has been successful, such as in Masoka, promising results have been achieved and the recent acceptance and implementation of direct payments to communities is probably the most significant development

since 2000. That this has happened can be attributed to CAMPFIRE enabling communities to maximize their roles within the existing set of rules, and by so doing, allowing these rules to be challenged.

Institutionally, much emphasis is given to leadership in CBNRM and related development projects, with the 'followers' referred to only infrequently. The importance of the accountability of the leadership to its constituency is emphasized in the cases of Masoka and Gairezi, which illustrate the strong influence on organizational and institutional development of collective will and social capital among a community. Where management committees and their office bearers are accountable, the community can then play a role in providing direction, keeping the direction focused and influencing change when required. Thus the followers help ensure the efficiency, legitimacy (transparency and accountability) and representational ability of their leadership – crucial elements of sound governance. Local communities are now beginning to bring such accountability to bear on the bureaucrats who endeavour to 'run' them.

However, CAMPFIRE has been, and will continue to be embedded in and constrained by a number of fundamental issues, mostly in the policy arena, that are still being addressed. Government policies have mostly not worked well in rural areas and many CAMPFIRE communities have recognized this. In the current socio-economic and political environment in Zimbabwe, some wards provided their RDCs with 50 per cent or more of their revenue, despite punishing taxes either directly through levies and/or indirectly through distorted or misused exchange rates, together with neglect and/or bureaucratic interference. Given this poor administrative history, CAMPFIRE must be one of the best innovations seen in rural Zimbabwe since its Independence.

Notes

1 The analysis in this chapter is based on data sets that are relatively complete between 1989 and 2001, with some data continuing to 2006. Increasing gaps in the data occur following the cessation of major donor funding in 2003. Important site-specific 'snapshots' were made possible through two case studies in 2006/2007, augmented by other qualitative data and information. Together with the long-term data sets, these case studies provide invaluable insights, suggesting the future for CAMPFIRE, in certain contextual settings, is far from bleak.

2 Although the terms 'devolution' and 'decentralization' are used interchangeably here, Murphree (2005) defines 'decentralization' as the delegation of responsibility and limited authority to subordinate or dispersed units of hierarchical jurisdiction, which have a primary accountability upward to their superiors in the hierarchy, and 'devolution' as involving the creation of relatively autonomous realms of authority, responsibility and entitlement, with a primary accountability to their own constituencies.

3 In Zimbabwe, provinces are made up of districts comprised of wards. Wards in

turn comprise a number of villages. These spatially and physically defined groupings also reflect the lower-level administrative structures of the country, namely ward development committees and village development committees. Members of the CAMPFIRE Collaborative Group (subsequently the Service Providers) and other organizations worked primarily through the WWCs and WWMCs.

4 Between 1989 and 2006 the ZW$ exchange rate moved from ZW$2.126 to ZW$161,909.32 = US$1.

5 See Ingwe Safaris 2005 Year End Report to Guruve Rural District Council and minutes of the Gairezi Development Trust and the Nyanga Downs Fly Fishing Club, 2005/2006.

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57 FR 35473-01
RULES and REGULATIONS
DEPARTMENT OF THE INTERIOR
Fish and Wildlife Service
50 CFR Part 17
RIN 1018-AB42

Endangered and Threatened Wildlife and Plants; Retention of Threatened Status for the Continental Population of the African Elephant

Monday, August 10, 1992

*35473 AGENCY: Fish and Wildlife Service, Interior.

ACTION: Final rule.

SUMMARY: The Fish and Wildlife Service announces its final decision on a February 16, 1989 petition requesting that all populations of the African elephant (Loxodonta africana) be elevated to endangered status under the U.S. Endangered Species Act. The Service has determined, based on the most current data available, that the most appropriate classification of the continental population of the African elephant is that it remain listed as threatened. The Service has also modified the current special rule to prohibit the import of African elephant ivory into the United States (this effectively reenforces the June 9, 1989 moratorium on the importation of African elephant ivory into the United States under authority of the African Elephant Conservation Act); to not prohibit the possession of or interstate commerce in legally imported elephants or their products or parts; and to allow the importation of sport-hunted elephant trophies into the United States under prescribed conditions.
EFFECTIVE DATE: September 9, 1992.

ADDRESSES: The complete file for this rule is available for public inspection, by appointment, from 8 a.m. to 4 p.m., Monday through Friday, in Room 750, 4401 North Fairfax Drive, Arlington, Virginia 22203.

FOR FURTHER INFORMATION CONTACT: Dr. Charles W. Dane, Chief, Office of Scientific Authority; Mail Stop: Arlington Square, room 725; U.S. Fish and Wildlife Service; Washington, DC 20240 (phone 703-358-1708, FAX 703-358-2276).

SUPPLEMENTARY INFORMATION:

Background

The Fish and Wildlife Service (Service) was petitioned by Fund for Animals on August 18, 1977, to list the African elephant (Loxodonta africana) as endangered under the Endangered Species Act (Act), based primarily on the threat resulting from the commercial trade in elephant ivory. The Service, in response to that petition, conducted a status review and published a final rule on May 12, 1978 (43 FR 20499-20504) determining that the African elephant more appropriately met the criteria for a threatened species. The Environmental Impact Assessment prepared for that final rule stated that even though "the African elephant had been eliminated from much of its original range and is subject to severe overexploitation, there still are relatively large populations, some of them stable and well protected. An endangered classification thus would not accurately express the situation of this species * * *" A special rule provided for the importation of African elephants and products thereof into the United States, for primarily commercial purposes, in accordance with an ivory control system established under the Convention on International Trade in Endangered Species of Wild Fauna and Flora (CITES).

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The continental elephant population at that time was believed to total about 1.3 million animals with some populations stable and well-protected. Elephant populations in west Africa were considered fragmented, as populations occurred in remote border areas and/or in small isolated patches of suitable habitat. Elephant populations throughout the rest of Africa were ***35474** considered to be progressively losing land to expanding human populations and associated agricultural development. The offtake of elephants in 1978 clearly exceeded recruitment and the continental elephant population was diminishing. Few elephant management plans were developed or implemented and elephant protection and the ivory marketing control mechanisms were clearly inadequate.

The Service was again petitioned, on February 16, 1989, by the Humane Society of the United States, Animal Welfare Institute, International Wildlife Coalition, Animal Protection Institute, Society for Animal Protective Legislation, Friends of Animals, Inc., with support from other organizations, to reclassify the African elephant from threatened to endangered. The petition described continued declines in elephant populations because of continued illegal killing of elephants for the ivory trade and argued that the African elephant was endangered because of the continued threats resulting from that trade.

A variety of conservation efforts to curtail the illegal killing of elephants were initiated before and shortly after the petition was filed. Those actions, described below, included increased efforts by individual range countries to curtail poaching; ivory importation moratoria imposed by the United States, much of western Europe and Japan; and the transfer of the African elephant to CITES appendix I, which became effective in January 1990 and continues in effect.

The Service, in response to the February 1989 petition, conducted a status review and published a proposed rule (56 FR 11392-11401, March 18, 1991) stating that most populations of the African elephant (except for those in Botswana, South Africa and Zimbabwe, which remained as threatened) appeared endangered. Based on information available to the Service during its initial status review, the Service determined in the proposed rule that overutilization of the African elephant for commercial purposes was of sufficient threat to warrant reclassification of most populations to endangered. The Service evaluated this threat on a state by state basis, even though it was well-understood that elephants were not confined to political boundaries, because the level of protection provided to elephants and consequently the likelihood of overutilization varied between range states. The proposed rule indicated that the illegal killing of elephants to satisfy a worldwide demand for ivory severely impacted and endangered many elephant populations. Both elephant population and tusk weight data indicated or suggested population declines, although it was pointed out that many data sets were anecdotal accounts of former populations and somewhat precise statements of present populations. Records of ivory commerce indicated that the kill of elephants in the 1970s and 1980s was at levels that could not be sustained by the continental elephant population. It was pointed out that overutilization was both a cause for placing a population in an endangered status and a factor which if controlled could result in that population being retained in a threatened status.

A second major threat identified in the proposed rule was the inadequacy of existing regulatory mechanisms within the range states. It was pointed out that the establishment and implementation of elephant conservation plans to help develop management and enhance the protection of elephants would benefit many populations. The Service additionally acknowledged that information describing the effects of the most recent actions to control the ivory trade was not available at the time that the status review was conducted, and that the Service required additional information about those effects before preparing the final rule. The Service indicated that if substantial new information became available during the comment period the final rule could be substantially different from the proposed rule. In order to facilitate this process, the comment period on the proposed rule was extended, and because substantial conflicts existed in the newly acquired information, the Service extended the 12-month deadline for making the final determination on the proposed rule.

During the extended comment period, over 50,500 comments were received including: Extensive new information from African elephant conservation plans and the African Elephant Conservation Review of elephant management in 30 range states; extensive materials provided by several African range states; updated editions of the African Elephant Database; current information about the extent of the illegal killing of African elephants after enhanced elephant protection measures and the January 1990 CITES international ivory trade ban were implemented; and reports of the CITES Panel of Experts on the African Elephant on their evaluation of the management of the species in southern Africa.

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The final rule is different from the proposed rule. Foremost, the elephant population is considered on a continental basis and it is determined that its most appropriate classification is threatened. In 1992, the continental elephant population totals about 600,000 but the critical factor of overexploitation seems to be controlled because of: (1) Enhanced anti-poaching activities, (2) the CITES appendix I listing, and (3) various ivory import moratoria. There is substantial evidence that the illegal offtake of elephants on a continent-wide basis is significantly reduced and is probably somewhat less than recruitment. At present, several elephant populations remain stable and well-protected and other elephant populations seem to be increasing and perhaps are beginning to recolonize their former range. Elephant conservation plans have been developed for most range states and some plans are presently being implemented. Elephant protection has been enhanced in many areas and the ivory control mechanisms in the form of import moratoria and the control of international trade through CITES is determined to be functional and adequate. Generally, the same habitat threats exist in 1992 as existed in 1978 and continue to threaten the continental population of the African elephant. The west African elephant populations remain fragmented in isolated habitats and habitat loss still occurs throughout the remainder of the elephant's range because of expanding human populations and the increasing encroachments of agricultural development. Although elephant populations in 1992 are less than half those of 1978, a substantial elephant population of 600,000 still exists and the protection and management of those elephants is superior in 1992 to the conditions that existed in 1978, when the species was classified as threatened, and in 1989, when the Service was petitioned to reclassify. Just as in 1978, an endangered classification would not accurately express the situation of this species.

Summary of Comments and Recommendations

The initial 90-day comment period in the proposed rule published on March 18, 1991 (56 FR 11392-11401) was extended for 13 months (56 FR 33241, July 19, 1991; 57 FR 658-659, January 8, 1992; and 57 FR 9681-9682, March 20, 1992), to allow for receipt of information for development of a final rule and to resolve issues of conflicting data. State Department cables were sent to ***35475** American embassies in 26 range countries asking that the appropriate agencies in the range countries be officially notified of the proposed rule and requesting official comments. Copies of the proposed rule were also sent to each range country by diplomatic pouch. Representatives from 19 range countries in attendance at the African Elephant and Rhino Specialist Group Meeting in Gaborone, Botswana, on July 2-5, 1991, were also personally notified about the proposed rule.

A total of over 50,500 comments were received about a variety of issues pertinent to elephants. Most comments expressed concern and requested that the Service: (1) Provide endangered status for all populations of the African elephant (13,020 comments); (2) retain the importation ban on ivory and ivory products into the United States (17,625); (3) provide endangered status for all populations of the African elephant and keep the species on appendix I of CITES at the March 1992 CITES Conference (9,570); (4) retain the importation ban on ivory and ivory products and keep the species on appendix I of CITES (1,415); (5) provide endangered status for all populations of the African elephant and retain the importation ban on ivory and ivory products (270); (6) retain legally imported pre-ban (June 9, 1989) ivory in unrestricted interstate commerce and pre-empt individual states from enacting more restrictive regulation than those of the Federal government (630); (7) not place further restrictions on captive elephants (105); (8) retain threatened status for all populations of the African elephant (185); and (9) provide for the legal sport-hunting of African elephants (105). In addition, the Service received over 7,500 comments on the unrelated issue of retaining the African elephant on Appendix I at the March 1992 CITES Conference of Parties. The specific issues of interest varied through time. For example, the preponderance of responses received 2-4 months after publication of the proposed rule addressed listing preferences for the African elephant under the Act while most responses received eight or more months after the publication of the proposed rule addressed listing preferences for the African elephant under CITES.

A second and much smaller group of comments provided biological information that could be used in formulating this final rule (they are identified in References Cited) or which raised specific issues that required individual responses. The format of the final rule is substantially different from that of the proposed rule and many comments that pertained to the logic used to develop the assessment process or the assessments made for individual countries in the proposed rule are only generally addressed in the following responses.

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Comment 1.—Several comments criticized the proposed rule because it treated elephant populations as if they were contained within the borders of individual range states when in fact populations frequently move to or within two or more range states. They further argued that the Service should treat the continental elephant population as a single entity and provide a single classification that best represents the overall status of the elephant. The continental elephant population was said to face common threats and should be evaluated with regard to those threats.

Service Response.—The Service agrees the elephant population should be considered at the continental level. The proposed rule treated elephant populations on a range state by range state basis because the extent of exploitation and the quality of regulatory mechanisms varied among range states. It was an attempt to emphasize differences that existed at that time between states. Best data available at the time of the proposed rule indicated that only Botswana, South Africa and Zimbabwe had sufficient capabilities to control the overexploitation of elephants. Best data currently available suggest that overexploitation generally is controlled throughout the continent. Elephant conservation plans have been developed for most range states and have been implemented in varying degrees throughout the continent.

There is precedent for treating the African elephant on a continental basis. The 1978 final rule (43 FR 20499-20504), for example, treated the continental population as a single entity and found a threatened classification for the continental African elephant population. An additional reason for treating the African elephant as a single population is that controversy still exists about the systematics of the African elephant. For example, Smithers (1983) reviews taxonomic opinions on African elephants that variously describe (1) the forest elephant (L. cyclotis) as specifically distinct from the savannah, or bush, elephant (L. africana); (2) the two forms as conspecific because intergrading occurs where distributions overlap; and (3) a single species of African elephant with two subspecies, L. a. africana and L. a. cyclotis. Ansell (1971) states there may be five surviving subspecies of L. africana. These are cyclotis in the forested areas of central Africa and four subspecies of the L. africana section: africana in southern Africa, knochenhaueri in eastern Africa, orleans which may still occur in Ethiopia, and oxyotis south of the Sahara and north of the equatorial lowland forest zones where cyclotis occurs. The Service, because of the imprecision in defining the range of individual elephant populations, the dissention about the taxonomy of the African elephant, and the new information available since the publication of the proposed rule, has assessed the African elephant as a single entity within the African continent.

Comment 2.—Several commentators questioned the accuracy of population estimates and the stated population levels within individual range states.

Service Response.—The Service used the best information available to develop the proposed rule. Significant new information has since become available and has been used to develop the final rule. The Service has, in the final rule, relied on data from the African Elephant Database (GRID, 1991; Douglas-Hamilton et al., 1992) and from the conservation plans for individual range states for numerical estimates of populations. The African Elephant Database is coordinated by the European Commission African Elephant Survey and Conservation Project, in collaboration with the United Nations Environment Programme, the African Elephant Specialist Group and the World Conservation Monitoring Centre at Cambridge. The elephant conservation plans for individual states were produced with assistance from the African Elephant Conservation Coordinating Group with financial assistance from the U.S. Agency for International Development, the European Commission, the World Wildlife Fund and the U.S. Fish and Wildlife Service. It is generally accepted that these data sources are the best estimates of elephant populations currently available.

Comment 3.—The final rule under the Endangered Species Act should be consistent with the CITES classification.

Service Response.—The CITES appendix I listing for the African elephant was determined by an international vote under rules governing an international trade agreement. Appendix I status was maintained at the Kyoto, Japan, meeting in March 1992 because it did not seem possible, to a majority of the voting members, to market elephant products in a manner ***35476** that would not cause endangerment to the species. The listing of the African elephant under the Act is a biological assessment of the present threats to the species. CITES and the Endangered Species Act listings are not necessarily joined actions. The African elephant is being retained as threatened under the Act partly because of the effectiveness of the CITES appendix I listing in reducing pressures causing overexploitation of the African elephant resource.

Comment 4.—Several comments questioned the finding in the proposed rule that elephant populations in Botswana, South Africa, and Zimbabwe were threatened.

Service Response.—The elephant population in the three southern African countries was found to be threatened in the proposed rule using the best information then available. Since the publication of the proposed rule, the CITES Panel of Experts on the African Elephant (1991) found the South African elephant population to be viable, stable and under no current threat. The elephant population in Kruger National Park was acknowledged as one of the best monitored elephant populations in Africa and the resources and measures deployed to combat the illegal killing of elephants were found to be effective. The CITES Panel of Experts on the African Elephant (1992) found that Botswana's elephant population was viable and the panel identified no specific risks. Botswana was additionally found to have an acceptable population sampling system, a low level of poaching activity, and current anti-poaching measures that successfully kept poaching at low levels. Botswana's past and intended levels of offtake were found to be sustainable and the current illegal offtake was found to be negligible. Zimbabwe's national elephant population was also considered viable and the potential risks to that population were negligible (CITES Panel of Experts on the African Elephant, 1992). The panel found that Zimbabwe's Department of National Parks and Wild Life Management had a qualified staff and its aerial survey techniques were of high quality. Zimbabwe's current anti-poaching measures were considered the best in the region. Their effectiveness is indicated by the generally low numbers of elephants reported illegally killed over the last few years. The continuing stability of the southern African elephant populations and the reduced levels of overexploitation in other elephant populations are basic to the decision to retain the current continental elephant population as threatened.

Comment 5.—Comments in petition forms were received from Zimbabwe and South Africa to delist the populations of African elephants within their borders.

Service Response.—The Office of the Solicitor has determined that petitions received on a species during an open comment period established for that species should be treated as comments. Consequently, the Service utilized the substantial information submitted about the status of elephants in Zimbabwe and South Africa in the formulation of the final rule but made no individual listing decision for elephants within those two range states. The Service has chosen not to evaluate populations in individual range countries in this finding. This action is consistent with the Service position described in response to Comment 1.

Comment 6.—The continental elephant population should be classified as endangered because it may only be about one half of that which existed in 1978 when the continental population was listed as threatened and/or its current range is only about 25 percent of its historic range.

Service Response.—About six hundred thousand elephants still occur on over 5 million square kilometers (2 million square miles) of suitable habitat, there is no substantial evidence that current offtake on a continental basis exceeds rates of elephant recruitment, and elephant management in individual range states varies from inadequate to very good across the continent. Populations with these characteristics are best classified as threatened.

Comment 7.—Some comments opposed the retention of a domestic United States interstate trade in legal pre-ban ivory.

Service Response.—The Service has no evidence that the continued interstate trade within the United States of legally imported African elephants and their parts and products will lead to ivory smuggling into the United States or fuel elephant poaching in Africa. The lack of a prohibition against interstate commerce does not imply support by the Service either for the resumption of the import of ivory into the United States or for the resumption of ivory trade in the world market.

Comment 8.—No sale of elephant products should be considered beneficial to conservation because realized funds are usually returned to the general treasury rather than directly applied to elephant management.

Service Response.—The most beneficial use of funds generated from the sale of any elephant product is their direct

application to elephant management. Benefits also accrue to conservation, however, if monies returned to the general treasury cause governments to support effective elephant management in order to generate needed foreign exchange.

Comment 9.—The Service should support the nonconsumptive use of elephants throughout Africa by promoting ecotourism.

Service Response.—The Service supports both non-consumptive uses of African elephants as well as certain carefully regulated consumptive uses of African elephants as mechanisms for attaining revenues to enhance elephant and wildlife management throughout the African continent.

Comment 10.—Endangered species status is necessary because any other listing will lead to a reopening of the world trade in elephant products, especially ivory, which will lead to the extinction of the species. A threatened status would encourage the international trade in elephant products.

Service Response.—Maintaining threatened status for the African elephant under the Act effectively prohibits the importation of ivory or any elephant product into the United States unless an exception to that prohibition is provided by a special rule. The importation of worked or raw elephant ivory (except for sport-hunted trophies) into the United States is specifically prohibited by the moratorium established under the African Elephant Conservation Act (54 FR 24758-24761) and the present final rule creates no exceptions to the import prohibition. Neither a threatened nor an endangered listing under the Act would have any direct impact on international commerce that is not under United States jurisdiction. International commerce in African elephant products is regulated by the CITES appendix I listing.

Summary of Factors Affecting the Species

Section 4(a)(1) of the Act (16 U.S.C. 1531 et seq.) and regulations (50 CFR part 424) promulgated to implement the listing provisions of the Act set forth the procedures for adding species to the Federal lists. A species may be determined to be endangered or threatened on the basis of one or more of the five following evaluation factors: (A) The present or threatened destruction, modification, or curtailment of its habitat or range; (B) over utilization for commercial, recreational, ***35477** scientific, or educational purposes; (c) disease or predation; (D) the inadequacy of existing regulatory mechanisms; and (E) other natural or manmade factors affecting its continued existence.

The following assessment is largely based on new information that has become available to the Service since the publication of the proposed rule.

A. Present or Threatened Destruction, Modification or Curtailment of Its Habitat or Range.

Elephant range may at one time have extended over 21,250,000 square kilometers (8,202,500 square miles) of the African continent. This assumes that the 9,000,000 square kilometers (3,475,000 square miles) of Sahara Desert was never elephant habitat but assumes that all other land areas of the continent could have been elephant habitat. Ansell (1971) states that within the last three centuries the species occupied virtually all of sub-saharan Africa except the very dry sub-desert steppe of the Sudanese Arid zone, the desert and sub-desert parts of the Somali Arid zone and the coastal desert of the South West Arid Zone. The petitioners note (Humane Society of the United States et al., 1989:29) that by the Middle Ages elephants had been exterminated from their habitats in North Africa by ivory hunters. Ansell (1971) states that the species became extinct north of the Sahara by the sixth century A.D. Douglas-Hamilton (1987) states that most elephants were eradicated from West Africa in the early years of the twentieth century. The ivory trade may have caused a population crash in west Africa by 1914. These conditions for northern and western Africa also existed in 1978 when the continental population of the African elephant was classified as threatened. The present elephant range is estimated to be about 5,188,000 square kilometers (2,002,500 square miles) (Douglas-Hamilton et al., 1992) so the present elephant range is about 25 percent of the range that existed before the sixth century A.D. The present elephant range is still a vast area, nearly the size of the 39 states ranging from North and South Dakota, Wyoming, Colorado, Oklahoma and Texas east to the eastern coast of the United States. This is an area elephants can be expected to occur, not the bounds of an area containing fragments of habitats suitable for elephants. This vast area also contains a variety of cover types used by elephants. For example Douglas Hamilton et al.

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(1992) state that forest and forest-grasslands are the dominant habitat types in central Africa, bushland-thicketed mosaic and miombo woodlands predominate in eastern Africa, miombo woodland and woodland mosaics predominate in southern Africa and Sudanian woodland and forests predominate in west Africa.

Cumming et al. (1990) describe the history of the elephant in Africa and link the historical decline of the elephant to the following three major factors: (1) The demand for ivory, which has often been at a level that is totally unsustainable; (2) desertification which has clearly been a major cause for the disappearance of the species in North Africa and the Sahara and continues to impact the small remaining populations in the Sahel; and (3) conflicts between elephant and humans for the use of the land. Although factor 3 may ultimately come to limit elephant populations, it is the ivory trade that historically has had the greatest impact on elephants.

Any assessment of the habitat of the continental population of the African elephant must consider the question of scale. Types of impacts are discussed below but often no quantifiable mention is made of the extent of an impact. The inability to discuss rates and extent of deforestation or rates and extent of habitat loss to agriculture, etc., further justifies evaluating the status of the African elephant on a continental basis. The discussion indicates that man's impact on the environment and elephant habitat is widely evident. Still, habitat destruction, modification or curtailment does not presently endanger the continental population of the African elephant. Expanded elephant populations could and probably would be tolerated in many African habitats.

East Africa

Seven eastern African countries presently have an estimated 96,000-134,000 elephants on about 1.1 million square kilometers (about 425,000 square miles) of habitat (Douglas-Hamilton et al., 1992). A significant portion of this extensive habitat is in National Parks, Game Reserves and other protected areas.

Perhaps 2,000-2,450 elephants occur on about 119,000 square kilometers (46,000 square miles) of habitat mostly in forested areas in southwestern Ethiopia (AECCG Ethiopia, 1991). Elephants were widely distributed until the turn of the century so the present distribution is much reduced from historical levels. Problems of land-use conflicts between people and elephants are complicated by rapidly increasing human populations, poverty, civil unrest, inadequate protection and management of elephants, and a lack of public awareness of the need for conservation. Land degradation has occurred because the dense human populations have put extensive pressures on natural resources and because of outdated agricultural practices.

About 25,800 elephants (Poole, 1992) presently occur in Kenya on about 413,000 square kilometers (159,000 square miles) of habitat. Elephants in some areas may become confined in Parks and Reserves surrounded by cultivation so that some populations may eventually have to be regulated (AECCG Kenya, 1991). Elephant range is extensive in Kenya and several communal lands, National Parks and Game Reserves provide important habitats for elephants. A new Community Wildlife Program has been initiated to enhance acceptance and management of wildlife species on private lands and communal lands around parks and Reserves. Kenya can probably support an elephant population twice the present population without adversely impacting available habitats or rural Kenyans.

National parks and reserves occupy more than 10 percent of the land area of Rwanda (AECCG Review, 1991). GRID (1991) lists the total protected area as about 2,700 square kilometers (about 1,050 square miles) and the Elephant Conservation Plan for Rwanda lists an elephant population of 80-100 animals. Rwanda is one of the most densely populated countries in Africa. The pressure of human populations and demands for cultivatable lands threaten the security of protected lands and the long term future of elephants in Rwanda.

Somalia represents the eastern extremity of the range of the African elephant. Elephant range has been significantly reduced since 1979 so that elephants now occur in about 56,000 square kilometers (21,600 square miles) of habitat in southern Somalia (AECCG Somalia, 1991). The surviving population of elephants numbering between 1,000-2,000 animals live within a 100 km-wide strip along the Kenyan border. The present range includes four dry season concentration areas and the swampy creeks of Bush Bush National park. This part of Somalia still contains sizeable areas of good habitat with adequate

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forage, water and shade that can support far larger elephant populations than presently occur.

Sudan is the largest country in Africa with 2.5 million square kilometers (965,000 square miles) of desert, savanna, bush, forest, mountain and swamp (AECCG Sudan, 1991). Sudan has a population of 27 million people and an elephant population that is variously estimated at 22,000-44,600. Several set-aside areas are protected by ***35478** remoteness, harsh climate and rugged terrain. Other areas are impacted by grazing, firewood harvesting, agriculture and general human encroachment. Sudan still provides extensive habitat for elephants, has ample set-aside areas that could be useful for elephant protection and management, and remains a potentially important habitat for elephants and other wildlife in the northern portion of Africa.

Elephant range presently occupies about 50 percent (501,000 square kilometers or 193,400 square miles) of the land area of Tanzania. About 25 percent of the total land area (245,000 square kilometers, 94,560 square miles) is designated to provide some degree of protective status to wildlife species like elephants (AECCG Tanzania, 1991). The growth of human populations and of agricultural developments around conservation areas have led to increased levels of human-elephant interactions and crop depredation which in turn directly leads to elephant mortality. The present elephant population in Tanzania is estimated at 44,000-57,000. The Wildlife Division believes it is appropriate to manage about 70,000 elephants in Tanzania (Mlay, 1992).

The political and conservation situation in Uganda has improved significantly since 1986 and efforts are being made to restore protected areas and the tourist industry based on those protected areas (AECCG Uganda, 1991). The Ugandan elephant population is believed to number 1,200-1,900 animals and to include both savanna and forest elephants. The preservation of habitat for the two forms will preserve habitat for many species. The intended policy of the government is to transfer the ownership of wildlife outside of reserves to the local people so they may manage their wildlife, with government advice, along the tenets of Zimbabwe's CAMPFIRE program.

Central Africa

About 268,000 elephants (Douglas-Hamilton et al., 1992) are estimated to occur in Central Africa. GRID (1991) lists 1.7 million square kilometers of forest habitat and 1.2 million square kilometers of savanna habitat within the 7 countries of central Africa, a total habitat area equal to about 1.12 million square miles. More current data (Douglas-Hamilton et al., 1992) indicate that the total elephant habitat in Central Africa is 2,560,000 square kilometers (988,000 square miles). Central Africa presents great potential but poses some serious problems for elephant management. Barnes (1991a) states that in the long term, threats to forest elephants include: The expansion of roads, railways and pipelines; commercial plantations; logging; mining; and an expanding human population with its subsistence agriculture. Barnes (op. cit.) states that all these activities destroy potential elephant habitat, compete with elephants for land, fragment elephant habitats or provide access for poachers into otherwise inaccessible habitats. He considers the elephant to be a vital part of the forest ecosystem because it influences the structure and floristic composition of the forest and promotes biological diversity within the forest.

Cameroon has an area of 475,000 square kilometers (183,000 square miles) and a human population of 11.6 million (AECCG Cameroon, 1991). About 7,000 savanna elephants (Douglas-Hamilton et al., 1992) may dwell in the thorny wooded savannas of middle Cameroon and in the grasslands of the floodplain south of Lake Chad in northern Cameroon. Perhaps 20,000 forest elephants (Douglas-Hamilton et al., 1992) inhabit the dense, humid evergreen forest of extreme western Cameroon and the dense humid Congo forest of southern Cameroon. The evergreen Atlantic zone of low and mid-level forests in extreme western Cameroon has been extensively impacted by logging and human population pressures which have fragmented elephant habitats and reduced elephant populations. The evergreen cameroon-congolese zone of medium altitude forest in southern and southeastern Cameroon which covers about 111,000 square kilometers (42,800 square miles) remains a stronghold for a substantial population of forest elephants.

Information about the status of the elephant in the Central African Republic (CAR) is fragmentary. The CAR contains 304,000 square kilometers (117,300 square miles) of savanna habitat and 40,000 square kilometers (15,500 square miles) of suitable forest habitat (GRID 1991). That publication lists an estimated elephant population of 14,500 in the CAR. Douglas-Hamilton et al. (1992) lists a population of 18,500. The CAR is subject to the same habitat problems as are other

states in central Africa.

Elephant range formerly extended throughout much of southern Chad. Chad is one of the more northerly limits of present elephant habitat in Africa and shares savanna elephant populations with northern Cameroon and the Central African Republic. Fewer than 2,500 elephants are estimated to occur in 202,000 square kilometers (78,000 square miles) of potential habitat. Human population pressures and desertification associated with the southward extension of the Sahara have pushed agriculture into southern Chad where human-elephant conflicts are increasing (AECCG Review, 1991).

The elephant historically occurred throughout the Congo but at present is found is only about 40 percent of the country. The present elephant population is estimated at about 49,000 animals and perhaps 40,000 of these are forest elephants that occur in the northern forest massif bordering Gabon, Cameroon and Zaire (AECCG Review, 1991). Human populations are low and concentrated along communication corridors in the dense, humid, evergreen forest. Principal threats to elephants in the Congo include growing human populations in the south and timber exploitation and habitat fragmentation associated with oil exploration and development. Timber exploitation is not now a threat but logging is increasing and could become a threat in the future.

Equatorial Guinea is a small country of 28,000 square kilometers (10,800 square miles) with a sparse human population (350,000) living within dense forest habitats. Most persons depend on traditional agricultural activities with major commercial products being cocoa, coffee, palm oil, cassava and timber. The country lies within the Congo rainforest and much of the forest remains intact as logging has not yet made serious impacts on forest resources (AECCG Equatorial Guinea, 1991). Elephants are concentrated in southern Equatorial Guinea in areas of primary forest. Elephants have shifted from the northern portion of the country because of agricultural practices and logging activities which have modified elephant habitat and created disturbances. The elephant population is listed at about 600 animals by Douglas-Hamilton et al. (1992).

Gabon probably has one of the largest populations of elephants (50,000-87,000) in Africa (AECCG Gabon, 1991). Approximately 85 percent of Gabon's 267,000 square kilometers (103,000 square miles) is covered in tropical forests. Lahm and Barnes (1991) state that elephants are found in large forested blocks unpopulated by humans in the center of the country. The vast forests are largely uninhabited by man because the sparse human population is concentrated along the main roads. The forests have a potential to support a very large elephant population. Deforestation rates are very low (<0.1 percent per annum) and Gabon is expected to lose a smaller portion of its forested area than will any other ***35479** African country within the next 50 years.

The construction of the trans-Gabon railway has opened up virgin forests for logging, and planned or actual mineral and oil exploitation activities have introduced roads and human disturbances into areas that were formerly isolated and uninhabited. Slash and burn agricultural practices minimally impact protected areas and overall habitat. Rural human population densities are low so community oriented elephant management programs have been slow to evolve.

Zaire formerly was the most important habitat of the African elephant on the continent. Even today this country may provide 600,000 square kilometers (231,000 square miles) of habitat for the savanna elephant and 866,000 square kilometers (334,000 square miles) of habitat for the forest elephant (GRID 1991). The AECCG Review (1991) lists 25,000 elephants occurring in savanna habitats and 65,000 elephants living in forest habitats. That plan also states that these population figures may grossly underestimate the elephant population of Zaire because the elephants in the forest habitats have been little studied. On the other hand, Douglas-Hamilton et al. (1992) quote studies that suggest Zaire's total elephant population may only be 63,000. Barnes (1991a) states that the greatest threats to the extensive habitats of Zaire are forest fragmentation and deforestation caused by logging activities.

Southern Africa

Eight southern African countries provide 1,300,000 square kilometers (502,000 square miles) of elephant range and support between 169,000 and 245,000 (Douglas-Hamilton et al., 1992).

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Angola is one of the largest countries in sub-saharan Africa and is presently in a transition mode from civil war to democratic government (AECCG Angola, 1991). Wildlife habitats are varied, ranging from lowland rainforests, deserts, and miombo woodlands phasing into forest-savanna in the north and mopane woodlands in the south. Angola possesses great biotic diversity and is in the paradoxical situation of possessing one of the richest and most varied, yet least well known wildlife resources in Africa. Angola is the only elephant range in Africa to include desert and rainforest biomes and the savanna, forest and rare desert-dwelling elephant. Information about elephants in Angola is indirect, crude and unreliable. This is reflected in estimates of elephant range as between 200,000-400,000 square kilometers and of the elephant population as being between 10,000 and 50,000. Habitat loss or conflicts over land-use are not expected to be near-future threats to Angola's elephants.

The major elephant range in Botswana encompasses an area of 80,000 square kilometers (30,800 square miles) north of latitude 20 degrees (Department of Wildlife and National Parks, Botswana, 1991). This area contains an elephant population estimated at 54,600 (46,000-63,000) which is about 99 percent of the country's total African elephant population. Seventy-five percent of the population withdraws into about 16 percent of this northern range during the dry season. These dry season core areas contain riverine habitats which are the rarest and most diverse habitats in the country. These elephant concentrations may produce sufficient foraging pressures to cause significant habitat damage. Botswana believes it is necessary to pursue the active management of elephants so that important habitats will not be destroyed.

Botswana's elephant management policy is to maintain elephants at their 1990 population level (about 55,000), maintain the quality of elephant habitat at an acceptable state, preserve biodiversity within major habitats and to reduce conflicts between elephants and humans. Botswana may develop watering points to try and lure elephants from riverine habitats and to reduce habitat degradation.

Malawi's elephant range is about 9,000 square kilometers (3,400 square miles) which is restricted to protected areas in national parks, game reserves and forest reserves (AECCG Malawi, 1991) Malawi has a rapidly increasing human population, a shortage of agricultural land and one of the highest human population densities in Africa. There is a growing conflict in Malawi over land-use, the major problem facing protected area management and elephant conservation. A sustainable population of perhaps 2,500 elephants could be maintained within the established protected areas if effective fencing was installed to separate elephant habitats and agricultural activities.

The total elephant population in Mozambique was estimated at perhaps 13,350 animals in 1990 (AECCG Mozambique, 1991). Potential elephant range is extensive and habitat is contiguous in large areas of Mozambique. All protected areas, however, have been severely impacted by the continuing civil conflict which has now lasted for 26 years. Negotiations are ongoing with South Africa to establish a large common national park that will include Kruger and a comparable area in the Limpopo Valley in Mozambique.

Elephants were formerly distributed throughout much of Namibia but agricultural settlements and unrestricted hunting in the late 19th century and agricultural developments in the early and mid-20th century forced elephant populations into their present distribution. The elephant populations and their distribution patterns have been largely unchanged in the last two decades (AECCG Namibia, 1991). More elephants occur outside protected areas than within and elephants generally move freely in and out of parks and reserves. The future of elephants outside parks and reserves and the key to enlarging protected areas lies in allowing local communities to utilize elephants or share in revenues from the harvest of elephants. The Ministry of Wildlife, Conservation and Tourism is striving to initiate a community outreach program to promote programs of sustainable utilization of wildlife. Habitats available to elephants can be substantially increased in the future by introducing elephants into suitable protected areas outside the present elephant range, by establishing additional areas of protection, and by allowing the introduction of elephants into privately owned nature reserves and game farms.

The Caprivi strip and northern and northeastern Namibia share borders and elephant populations with Angola, Zambia, and Botswana. Some elephant passage corridors in the Caprivi are protected and Namibia has already established regional coordination efforts with Botswana. The continued existence of the northeastern portion of Namibia's elephant population may well depend on the success of game management programs in neighboring countries.

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Seventy-five percent of the elephant range and 85 percent of the elephants in South Africa are within Kruger National Park (National Parks Board of South Africa, 1991a). Other elephant ranges are composed of state and private lands located both near Kruger and in small scattered blocks elsewhere in South Africa. Range available to elephants has increased by about 3,900 square kilometers (1,500 square miles) since 1979.

Management for elephants in Kruger National Park has provided a water stabilization program by building dams on watercourses and providing wind driven water pumping devices. Facilities are in place to control wildfires and to ***35480** allow for controlled burning of vegetation. Kruger has an elephant proof fence along the boundary with Mozambique and a variety of cross fences and boundary fences to control movements and foraging pressures.

Zambia provides about 211,000 square kilometers (81,400 square miles) of elephant habitat and possess a population of 32,000 elephants (GRID 1991). The AECCG Zambia (1992) estimates the African elephant population to be less than 25,000 with 50 percent occurring within the National Parks in the Luangwa Valley. Most human-elephant conflicts center around agricultural areas, although mining also impacts elephant habitat. Recent efforts have indicated that wildlife management and the acceptance of wildlife as a legitimate land use are enhanced when local residents share in management responsibilities (Lewis et al., 1990).

Zimbabwe provides 113,000 square kilometers (43,500 square miles) of elephant habitat and has an elephant population estimated at 51,700 (GRID 1991). The Zimbabwe Department of National Parks and Wild Life Management believes the present elephant population may be about 70,000 and has stated that their elephant management goal is about 43,000 animals (Nduku 1991). Douglas-Hamilton et al. (1992) list an elephant population of 49,700-68,400. Over 12 percent of Zimbabwe's surface area is dedicated to national parks, safari areas, sanctuaries, recreational parks, botanic reserves and botanic gardens. The management objectives in these lands are to: Manage wildlife species including elephants; preserve representative examples of Zimbabwe's aquatic and terrestrial flora and fauna and their physical environments; protect areas of scenic beauty and special interest; preserve rare, endangered and endemic species; conserve water catchments; and to provide opportunities for public education and the advancement of scientific knowledge. All significant physical developments in these areas require an environmental impact assessment, and careful environmental planning is undertaken to minimize environmental impacts when development is inevitable (Zimbabwe Department of National Parks and Wild Life Management, 1991).

An additional 20 percent of the surface area of Zimbabwe has become dedicated to wildlife management since 1980 because of the Communal Areas Management Programme for Indigenous Resources (CAMPFIRE). This program is an important new-political-economic-sociological institution that has developed an environmental ethic, restored the perception of wildlife as a valuable resource, advocated wildlife management as an adjunct to subsistence agriculture, and encouraged the conservation of natural ecosystems and wildlife habitats on tribal trust lands (Anon, 1990).

West Africa

An estimated 10,000-16,000 African elephants presently dwell in a series of highly fragmented habitats that are estimated to total about 229,000 square kilometers (88,400 square miles) throughout western Africa (Douglas-Hamilton et al., 1992). Increasing human population pressures and declining natural productivity (two decades of drought) in dry savanna habitats have confined remaining elephant populations to isolated pockets of habitat largely in parks and other reserves (Cumming et al., 1990). Douglas-Hamilton (1987) indicated that most elephants were eradicated from west Africa in the early twentieth century. The 1978 Federal Register notice (43 FR 20503) listing the continental African elephant population as threatened indicated that the elephant in west Africa occurred in remote border areas or in small isolated patches of suitable habitat. That is essentially the present condition.

Agricultural development and logging are serious agents of habitat destruction in Sierra Leone (AECCG Sierra Leone, 1991), Togo (AECCG Review, 1991), Liberia (AECCG Liberia, 1991), Guinea (AECCG Review, 1991), Ghana (AECCG Ghana, 1991), and the Ivory Coast (AECCG Review, 1991). The AECCG Review (1991) cites desertification as an important agent

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of habitat destruction in Burkina Faso, Mali and Niger. Drought and bush burning have adversely impacted habitats in northern Nigeria and deforestation and mineral exploitation have adversely impacted habitats in southern Nigeria (AECCG Review, 1991). That publication also states that habitat destruction is not considered the major limiting factor in Benin, Guinea Bissau and Senegal at this time. The small regional population of African elephants has apparently remained stable throughout most of this century and is not expected to increase in the foreseeable future. Habitat destruction and modification provide a greater threat to elephants in west Africa than to any other portion of the continental African elephant population.

B. Overutilization for Commercial, Recreational, Scientific or Educational Purposes

The present estimate of the continental African elephant population is 549,000-652,000. The methods for estimating these elephant numbers are described in detail in GRID (1991) and by Douglas-Hamilton et al. (1992), and those authors have carefully expressed the reservations associated with different data sources. Some critics have suggested that the estimates of the continental elephant population are too high. Douglas-Hamilton et al. (1992) state that there are no better estimates of elephant populations that are based on field measurements than those recorded in the African Elephant Database. They indicate (Douglas-Hamilton et al., 1992:7) that the lower estimates proposed by their critics seem to be pure guess-work. Douglas-Hamilton et al. (1992) acknowledge the problems associated with building the African Elephant Database. The vastness of the elephant range and the difficulty of assessing numbers in forest habitats and in range states with political unrest have made data collection arduous and expensive and have limited the quantity of high quality data available for analysis. The latest edition of the African Elephant Database (Douglas-Hamilton et al., 1992) lists only 54 percent of the elephant numerical data entries as being of quality "1" or "2" (best or medium quality).

Elephant populations seem to have fluctuated wildly through time because man has periodically been a persistent and proficient predator. Ansell (1971) stated that the elephant was exterminated from north of the Sahara by the sixth century AD and Douglas-Hamilton (1987) stated that most elephants were eradicated from west Africa by 1914.

Populations in west Africa were reduced to fragments of their former size and range and they have remained stable since that time (Cumming et al., 1990). An historical account of elephant numbers in South Africa (National Parks Board of South Africa, 1991a) indicates that elephants occupied much of present day South Africa, especially in the high rainfall areas, in the mid-seventeenth century. A hundred thousand elephants may have existed in the country in 1650. The decline in the elephant population between 1650 and 1790 is believed due to human settlement and population growth. Later declines from 1790 to 1870 were due to a massive elephant kill for the ivory trade, and from 1870-1920 ***35481** were caused because occasional elephants were killed because of crop depredation. Possibly only 100 elephants remained in 1920 when protective and management policies were established and enforced. Elephant populations in South Africa have since recovered to the presently managed population of about 8,000 animals. Similar trends in elephant populations have occurred in other areas of Africa as well.

Cumming et al. (1990) indicate that the combination of legislation, a fall in the price of ivory, and a drop in the demand for ivory associated with World War I allowed elephant populations to recover. Elephant populations had substantially recovered, by mid-century, in eastern, central and southern Africa so that some culling had to be undertaken to prevent habitat damage and human-elephant conflicts. The ivory trade increased substantially in the early 1970s as demand and supply pressures soared so that ivory exports from Africa reached pre-1914 levels. Douglas-Hamilton (1988) stated that the wave of elephant killing for ivory in the 1970s and 1980s was the second of its kind in recorded history. The first essentially wiped out elephants in much of east Africa by the end of the nineteenth century. Douglas-Hamilton (1988) stressed that in 1990, when it was feared that the elephant would become extinct, game laws were enforced and populations began to increase.

There were several conservation efforts implemented in the 1970s when it was realized that the illegal killing of elephants was widespread and that many elephant populations, especially in east Africa, were in decline. The elephant was put on appendix II of CITES in 1977 and was classified as threatened by the Service in 1978 which at that time issued regulations that allowed the importation of ivory into the United States in accordance with the CITES ivory control system (43 FR 20499-20504). The elephant was also listed as vulnerable by the International Union for Conservation of Nature and Natural

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Resources (IUCN) in 1978. There conservation efforts were deemed as failures in the late 1980s when the illegal killing of elephants for ivory commerce was considered out-of-control. Many elephant populations were believed to be in substantial decline and alternative conservation measures were necessary when the petition to reclassify the African elephant as endangered was filed in February 1989. The petitioners identified the ivory trade as the single most important factor threatening the elephant. This was supported by Douglas-Hamilton (1988) who stated that even a very cautious scientist would (at that time) recognize that the elephant would become an endangered species if the offtake of ivory continued at the rate observed from the 1970s through his reporting period. His assessment was based on: (1) Population trends from throughout the continent (except in parts of southern and western Africa) that showed declines in elephant numbers coupled with high carcass counts; (2) ivory export curves that collapsed after the mid-eighties because elephants were becoming scarce which suggested overutilization; and (3) a diminished average tusk weight that also suggested overutilization. It seemed likely that one-half the elephant population, perhaps 700,000 animals, was lost in the decade 1979-1988.

Several conservation efforts to curtail the illegal killing of elephants were initiated in 1989. Individual range countries increased their efforts to protect elephants and the international community began to contribute substantially to anti-poaching campaigns. Tanzania organized Operation Uhai in 1989 to deal forcefully with elephant poaching activities and Kenya substantially reorganized its conservation agency into a more effective Kenya Wildlife Service in 1990. The United States, on June 9, 1989, established a moratorium on the importation of raw and worked African elephant ivory from all ivory producing and intermediary nations (54 FR 24758-24761). The action was taken under authority of sections 2202(a) and 2202(b) of the African Elephant Conservation Act. A number of other major ivory consuming nations, most notably those in western Europe and Japan, enacted similar legislation.

The African elephant was transferred from appendix II to appendix I at the seventh meeting of the Conference of Parties to CITES (October 1989). This occurred after a provision was approved that provided for a panel of experts to convene after a proposal had been received to transfer any elephant population back to appendix II. The panel of experts would recommend to the Parties whether specific biological and trade criteria were met for any populations later nominated for downlisting to appendix II. The change in status for the African elephant became enforceable on January 18, 1990 (55 FR 5847-5851, February 20, 1990; corrected March 5, 1990, 55 FR 7714-7716). The appendix I listing was continued by the Conference of the Parties to CITES that convened in Kyoto, Japan, in March 1992.

The Service based its proposed rule on the best information then available. Few data were available to judge whether the conservation actions undertaken in 1989-90 were effective. The 12-month finding (February 16, 1990) was made eight months after the United States ivory importation moratorium was imposed and one month after the elevation of the elephant to appendix I became enforceable. The proposed rule indicated that levels of protection and quality of management varied widely among individual range states and that most range state populations seemed best classified as endangered because they might still be subject to overutilization. New information available since publication of the proposed rule indicates that most populations of the African elephant presently are not being overutilized.

The following review is chronological and describes an increasing tendency toward control of the illegal killing of elephants throughout Africa. Many populations of the elephant are currently stabilized or perhaps are increasing. The steep rate of decline observed from the 1970s up to the mid-or late-1980s has been halted for most populations.

The several conservation activities that were implemented just before and just after the February 1989 petition was filed seem to be working as intended. The United States Government queried 33 American embassies in African range states in April 1990 to determine, among other things, if elephant poaching had slowed, increased or remained unchanged since the implementation of the CITES ban in January 1990. Embassy officials in May-July 1990, reported that elephant poaching was undiminished in Cameroon, Niger, Sudan and Zaire, while officials in Burundi, Ethiopia, Kenya and Zambia believe that poaching was diminished since the appendix I classification. Poaching may have increased but was still low in Botswana, and was low and remained so in Burkina Faso, Gabon, Liberia, Mali, Togo, Uganda and Zimbabwe. Poaching still occurred, but was likely more for meat than ivory, in Benin, Equatorial Guinea, Ghana, Cote d' Ivorie and Nigeria. No pertinent responses were received from other embassies.

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O'Connell and Sutton (1990) state that although some illegal killing continued, elephant poaching seemed to be decreasing in many African countries because of a lack of financial incentives and an increased vigor and effectiveness of government anti-poaching activities. They further state that if these trends hold, depleted *35482 populations can reasonably be expected to begin recovery.

Dougherty (1991) evaluated the status of elephant conservation in 10 African range states. Elephant poaching was never intense in Burkina Faso except near the borders with Ghana and the Ivory Coast where poaching may frequently be for meat. There is a prohibition against ivory commerce because elephant populations are fragmented and could be subject to extinction even under low poaching intensities. There are no reports of poaching where law enforcement is good but poaching may occur where protection is poor.

Elephant conservation in Cameroon varies by province. Overall, there was a significant decline in poaching in 1990. This trend is believed due to the reduced price for ivory. Elephants are still poached for ivory in extreme northern Cameroon but anti-poaching efforts may keep illegal killing below recruitment levels. The elephant is not in trouble where anti-poaching efforts are substantial.

There is no way to quantify and statistically compare poaching level before and after the ban in the Central African Republic (CAR). Improved conservation may be expected to occur in southwest CAR because of the strengthening of protection capabilities, new conservation initiatives stressing the sustained use of wildlife, and the ivory trade ban. The elephant appears safe where anti-poaching protection is good. Elephants in forest habitats may have fared better than those in savanna habitats although some poaching of elephants especially for meat still occurs within forest habitats. Large-scale conservation efforts, rural development and monitoring programs occur in northern CAR where poaching is presently under control.

The number of elephants in Ghana diminished in the past because of ivory poaching. Elephants is southwestern forests continue to be poached. The level of poaching within protected populations has dropped since 1988 and these elephant populations are currently slowly expanding.

Kenya's capability to conserve elephants is among the best in Africa. There is a general political stability which provides a good environment for the uninterrupted support of conservation, and wildlife and protected areas are perceived as important to the country's economy and balance of trade. The appendix I listing is believed responsible for the reduction in poaching, and elephants seem well protected from poaching at this time.

An ivory trade may still exist in Nigeria and poaching may still impact some populations especially those near the border with Chad.

Elephant poaching for ivory is now at insignificant levels throughout Tanzania. Operation Uhai was initiated in 1989 and was very effective. Present anti-poaching efforts also seem to be effective.

Poaching has been curtailed under the present government in Uganda and elephant numbers are slowly recovering.

Poaching has not stopped in Zaire but is possibly slowed.

More recently, Dublin and Jachmann (1992) evaluated the impact of the ivory ban on elephant poaching in six target states. Zambia experienced an overall decline in poaching in 1990-1991 compared to levels observed from 1987-1989. Although poaching rates were at the same rate or higher in some areas there have been significant reductions in poaching in the more important populations. These dramatic drops were due to increased law enforcement actions funded by external donors before the ban was established.

Dublin and Jachmann (1992) agreed with Dougherty (1991) that poaching in Tanzania was diminished because of Operation Uhai and because of an increased law-enforcement capability.

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Illegal hunting decreased in three of seven, but increased in four of seven, conservation areas in Malawi. One significant cause of increased poaching may be the one million Mozambican displaced persons now living in southern Malawi. Illegal killing and culling of elephants for crop damage are harvesting some populations at unsustainable rates.

There has been a minor effect of the ban on the illegal killing of elephants in Cameroon. The illegal killing of elephants continues in the northern savanna zone because an ivory market remains in Nigeria. A domestic but limited ivory market may also exist in Cameroon. Poaching rates are somewhat reduced in the forest zone where most elephants occur in Cameroon.

The illegal hunting of elephants in savanna habitats in the Ivory Coast continues at the same low levels as during the pre-ban era. Poaching in that country's forest zone is probably reduced because of increased law enforcement efforts.

Elephant populations in Zaire have declined by about 75 percent since 1981 and the ivory harvested from that country was sufficient to supply 30-40 percent of the ivory on the world market during the decade of the 1980s. Elephant poaching is still a major problem in the unprotected savanna zones of Zaire. Elephant poaching was reduced to low levels in protected savanna areas by the mid-1980s. The poaching situation has improved substantially in some forest zones in the last two years. The infusion of substantial funds from external sources in the mid-1980s has resulted in a rapid but localized reduction in illegal activity. The present illegal hunting of elephants seems lower in the rainforest zone than in unprotected savanna areas.

A major co-signatory to the February 16, 1989, petition (Humane Society of the United States, 1992) provided comments on January 30, 1992, on proposals by several southern African range states to transfer their populations of the African elephant from CITES appendix I to II.

The Humane Society quoted sources that indicated that the poaching of elephants had been greatly reduced in Kenya, Tanzania, Chad, Gabon, Burkina Faso, Zaire and the Congo. They especially emphasized the very substantial reductions in illegal killing in Kenya and Tanzania. The Environmental Investigation Agency (1992) also reported that elephant poaching has steeply fallen in east and central Africa and that elephants have started to re-colonize their former ranges.

Douglas-Hamilton et al. (1992) indicated that Gabon has retained relatively undisturbed populations of forest elephants because organized poaching has never become a way of life in that sparsely populated country. They also state that recent censuses in Kenya, Uganda and Tanzania show an arrest in rates of population decline. Sightings of carcasses declined in Tsavo National Park which contains one-third of Kenya's elephants. Similarly, poaching levels are reported to have decreased since 1989 in Tanzania. The positive change in population trends is attributed to massive investments in security as well as a reduction in the demand for ivory following the appendix I listing. Elephant populations in west Africa could still be declining because of the encroachment into elephant habitat because of human population increases and the hunting of elephants for bush meat. Poaching for ivory has been a problem in the past but this stimulus to poaching seems reduced compared to years prior to 1989. Elephant populations in South Africa, Namibia, Botswana and Zimbabwe were believed to have been increasing even during the decade of the 1980s.

The CITES Panel of Experts on the African Elephant (1991, 1992) evaluated several southern African elephant populations. The African elephant populations in Botswana, South Africa, *35483 and Zimbabwe were found to be viable, and potential risks or threats to those populations were found to be negligible. Malawi's elephant populations were found to be viable only in the short or medium term, and Namibia's elephant population was found to be subject to fluctuations as a result of natural mortality due to periodic drought and disease. The Panel found that Zambia's national elephant population had declined dramatically but three potentially viable sub-populations remained. The greater Luangwa Valley population numbering some 10,000 elephants shows no evidence of significant poaching over the past three years and its prospects are good if poaching remains contained. The other two sub-populations still have significant numbers of elephants but have experienced heavy poaching.

There is also a question of scale when evaluating Factor B. The fact that some legal and illegal killing of elephants continues to exist does not constitute overutilization of the species if total mortality does not exceed recruitment. Man has historically been the chief predator of elephants. Barnes (1991b) has pointed out that many rural Africans, especially in central Africa,

are hunters and not pastoralists. Hunting is a cultural heritage of many native Africans. Opportunistic hunting often to provide meat or to protect agricultural crops can impact fragmented or local elephant populations but does not endanger the continental elephant population.

The Service finds that the present rate of utilization, because the several conservation measures instituted in 1989 and thereafter appear to be effective, does not endanger the continental population of the African elephant at the present time. This evaluation could change if a large scale illegal killing of elephants to satisfy an unregulated ivory trade once again occurred.

C. Disease or Predation

Some reports exist of lion predation on very young calves and of anthrax as an agent controlling some specific elephant populations, perhaps most notably the elephant population in Etosha National Park, Namibia. Namibia's elephant population may be considered to be subject to fluctuations as a result of natural mortality due to periodic drought and disease (CITES Panel of Experts on the African Elephant, 1992). Disease or predation, however, are not factors that threaten the continental population of the African elephant.

D. The Inadequacy of Existing Regulatory Mechanisms.

Information available to the Service at the time of the 12-month finding and of the publication of the proposed rule indicated that the management infrastructure in most range countries was inadequate to control the overutilization of the elephant. New information since the publication of the proposed rule indicates the increased effectiveness of enhanced anti-poaching activities and the effectiveness of the various ivory importation moratoria and of the CITES appendix I ban in dampening the international demand for elephant ivory. The African elephant is not being overutilized at the present time because of the adequacy of these international, continental, regional, and state regulatory mechanisms.

Most range countries have now developed elephant conservation plans. Five range countries (South Africa, Namibia, Zimbabwe, Botswana and Tanzania) have individually described a specific long-term population goal for elephants and determined planned actions to achieve those goals. The five countries are each members of CITES and believe they can eventually support a population that could total about 191,000 elephants without destroying agricultural based economies, habitat quality, or threatening human populations. These five countries already have substantial investments in wildlife management but will continue to need external aid to purchase additional elephant habitat; provide, improve and maintain anti-poaching equipment; improve salaries for wildlife personnel; and to generally improve the infrastructure associated with elephant management. These countries possess some of the greatest opportunities for consumptive and non-consumptive tourism in Africa.

The potential maximum elephant population in South Africa is about 13,000 if funds become available for purchasing additional habitats and improving present habitats (National Parks Board of South Africa, 1991b). Namibia has established a provisional elephant goal of 10,000 animals which will require the establishment of additional protected areas, the establishment of sustainable wildlife management programs with native persons, and perhaps the introduction of elephants into suitable habitats outside the present elephant range. Several thousands of the 10,000 animals could be seasonal visitors only, as is true for the present elephant herd in Namibia (AECCG Namibia, 1991). Zimbabwe could support 43,000 elephants and sustain a desired degree of woodland cover (Nduku 1991). Botswana's elephant management objectives include maintaining elephant populations at their 1990 levels which total about 55,000 animals (Department of Wildlife and National Parks, Botswana, 1991). Zimbabwe and Botswana could presently have elephant populations in excess of their respective management goals. Tanzania's elephant management goal is about 70,000 animals (May 1992).

A sixth country, Kenya, also has extensive regulatory mechanisms in place. Kenya is unwilling to commit to a numerical elephant management goal but seems to want to attain and maintain elephant numbers that are about double the present elephant population. Conflicts between people and elephants already exist in some areas of the country because of a rapidly growing human population (Poole, 1992). Kenya plans to maintain elephants at present levels where people and elephants

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coexist and to allow elephants to increase in numbers, especially in those protected areas where poaching severely reduced elephant numbers in the 1970s and 1980s.

Perhaps the most significant difference in an elephant management program in these six African range states and a big game management program in North America is that African elephant management programs are usually significantly underfunded. Otherwise the quality of management and science seems comparable.

The remaining range states may presently support about 400,000 elephants (Douglas-Hamilton et al., 1992). Most of these states have established game departments, are developing an environmental ethic, and intend to develop wildlife conservation as a legitimate land use. Their management infrastructure suffers because of inadequate funding. Indeed, the under-funding of Africa's wildlife departments is the most pervasive and fundamental problem facing the elephant at the present time (AECCG Review, 1991).

Elephant management in most states in 1992 is equal or superior to that which existed in 1978 when the elephant was classified as threatened. The knowledge base about elephants and techniques for censuring and protecting elephants are superior to 1978 conditions. The recently developed conservation plans have helped range states develop their elephant management programs and to compete for funding from external donors. A fundamental priority within the elephant conservation plans is for ***35484** range states to increase their operating capability and their professional proficiency.

All legal international trade in elephant products virtually ceased as of January 1990. The global demand and the price of ivory has virtually collapsed (AECCG Review, 1991). Many range states outside of southern Africa favored retention of the elephant on CITES Appendix I because that action would lead to a diminished international demand for ivory and to reduced poaching pressures on elephants within their countries. More effective law enforcement has also had a great influence on the suppression of poaching (Dublin and Jachmann 1992). Financial support for wildlife departments to increase protective actions is considered an action that can go an enormous way towards curing Africa's wildlife conservation crisis, at least in the short and medium terms (AECCG Review, 1991).

Willdlife departments in several range states realize the need to further codify the traditional rights of rural people to make use of wildlife and to profit from its presence. A basic common deficiency in the enforcement of present status has been weak support from the judiciary and a lack of support from customs officials and the police (AECCG Review, 1991).

The short term aims in the elephant conservation plans are to protect elephants from illegal killing, to improve the management of protected areas and to strengthen the management capability of wildlife departments. The AECCG Review (1991) suggests these are feasible when political stability exists and if sufficient financial support arises. The long term goals are to balance wildlife and human needs. This requires that sufficient returns be realized from the sustainable utilization of wildlife so that wildlife conservation is easily perceived as an important land use. The CAMPFIRE program in Zimbabwe is an excellent example of a social program built on values obtained from the sustainable utilization of wildlife resources.

E. Other Natural or Manmade Factors Affecting its Continued Existence.

The African elephant, like many terrestrial species, is adversely impacted by natural factors such as desertification and periodic drought. Desertification associated with the southward extension of the Sahara and periodic drought like that presently impacting many habitats in southern Africa may cause elephant mortality, limit recruitment, cause local or regional range contraction, and may increase competition among other wildlife species and man for dwindling resources. Civil unrest in several range states also adversely affects elephant populations. Both political unrest and environmental stresses may impact local or regional elephant populations but neither threatens the continental elephant population at this time.

Available Conservation Measures

Conservation measures provided to species listed as endangered or threatened under the Endangered Species Act include recognition, recovery actions, requirements for Federal protection, and prohibitions against certain practices. Recognition

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through listing encourages conservation measures by Federal, international, and private agencies, groups, and individuals.

Section 7(a) of the Act, as amended, and as implemented by regulations at 50 CFR part 402, requires Federal agencies to evaluate their actions conducted within the United States or on the high seas, with respect to any species that is proposed or listed as endangered or threatened and with respect to its proposed or designated critical habitat (if any). Section 7(a)(2) requires Federal agencies to ensure that activities they authorize, fund, or carry out are not likely to jeopardize the continued existence of a listed species or to destroy or adversely modify its critical habitat.

If a proposed Federal action may affect a listed species, the responsible Federal agency must enter into formal consultation with the Service. Because the African elephant is presently listed as threatened, it is already fully covered by section 7(a), and no new requirements are added by the present listing action.

Section 8(a) of the Act authorizes the provision of limited financial assistance for the development and management of programs that the Secretary of the Interior determines to be necessary or useful for the conservation of endangered species in foreign countries. Sections 8(b) and 8(c) of the Act authorize the Secretary to encourage conservation programs for foreign endangered species, and to provide assistance for such programs, in the form of personnel, and assistance for research, conservation, management, or protection of the species.

These actions are also conducted under the authorization of section 2101 of the African Elephant Conservation Act (AECA) that provides, through the African Elephant Conservation Fund, a means to provide financial assistance for elephant conservation to African government agencies responsible for African elephant conservation and protection. This fund provides significant financial assistance to range states to develop scientific information for habitat conditions and elephant numbers and trends, to control the take of African elephants, and to implement conservation programs to provide for healthy and sustainable populations of African elephants.

Permits may be issued to carry out otherwise prohibited activities involving threatened species, including individuals, their parts and products thereof, under certain circumstances. Regulations governing permits for threatened species on CITES Appendices are listed in 50 CFR parts 13, 17, and 23, and must be met before the permit can be issued.

Revision of the Special Rule

The final revised special rule provides for basically the same prohibitions and exceptions as did the proposed revised special rule (56 FR 11399-11401). The current special rule (50 CFR 17.40(e)) provides exceptions which allowed for the import and export of raw and worked ivory and other parts from threatened populations for commercial and other purposes under certain conditions. These exceptions were superseded by the June 9, 1989 ivory moratorium (54 FR 23758) imposed under the AECA and the January 18, 1990 transfer of the African elephant to CITES appendix I. Neither the proposed revised special rule nor the final revised special rule have provided general exceptions to the prohibition against the import of raw and worked ivory into the United States. The Service believes the general prohibitions against the ivory trade can help reduce any future overutilization of the African elephant resource. The final revised special rule does contain limited exceptions that allow the import of ivory that is either bona fide antique, or that has first been registered with the U.S. Fish and Wildlife Service, legally exported, and is being legally reimported. No exception is granted to the prohibition against the export from the United States of any African elephant raw ivory for commercial purposes. The exception granted for the export of worked ivory requires that permit criteria in 50 CFR parts 13 and 23 be met.

The AECA specifically allows individuals to import sport-hunted elephant trophies that have been legally taken in an ivory producing country that has submitted an ivory quota, even if a moratorium on ivory imports from that country has been established under the *35485 AECA. The Service notes that both this form of consumptive utilization, as well as forms of non-consumption utilization, as well as forms on non-consumptive utilization, provide important revenues for elephant conservation to range states. The proposed revised special rule allowed the import of sport-hunted elephant trophies from threatened populations if general Act permit procedures and CITES requirements were met. CITES requirements included a determination that the killing of elephants for sport-hunting enhances the survival of the species by providing financial

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support programs for elephant conservation. This requirement is retained in the final revised special rule for the import of sport-hunted trophies from threatened populations that are on CITES appendix I. A CITES appendix I import permit is required and can only be issued after the Service has determined that the import is non-detrimental to the species and that the killing of the animal whose trophy is intended for import would enhance the survival of the species. A separate permit under the Act is not required. No specific criteria for satisfying the CITES I import requirements are listed in the final revised special rule and the criteria listed in the proposed revised special rule have been deleted. The final revised special rule contains an exception to the import prohibition which allows the import of sport-hunted trophies when the following conditions have been met: (1) The trophy was taken in a country that has established a sport-hunting quota for the year of export; (2) a CITES appendix I import permit has been provided after all necessary requirements have been fulfilled; and (3) the trophy has been legibly marked. The sale or offer for sale of such trophies is prohibited by permit conditions.

The proposed revised special rule included an exemption from general prohibitions in the Act regarding interstate transactions in non-antique ivory from endangered populations. This was included because of the split-listing status that was proposed for the African elephant. The Service has no evidence that the continued interstate commerce within the United States in legally imported African elephant ivory contributes in any way to illegal killing and the overutilization of the African elephant resource. Consequently, the Service, in the final revised special rule, includes an exemption from the general prohibitions to allow the possession and interstate commerce of legally imported African elephants and their products and parts. This remains unchanged from the existing special rule, and includes not only ivory but also live animals and all African elephant parts and products that were legally imported.

National Environmental Policy Act

The Service has determined that an Environmental Assessment, as defined under the authority of the National Environmental Policy Act of 1969, need not be prepared in connection with regulations adopted pursuant to section 4(a) of the Endangered Species Act, as amended. A notice outlining the Service's reasons for this determination was published in the Federal Register of October 25, 1983 (48 FR 492440).

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Author
The primary author of this final rule is Dr. Henry L. Short, Office of Scientific Authority, U.S. Fish and Wildlife Service, Washington, DC 20240 (703-358-1708).

List of Subjects in 50 CFR Part 17
Endangered and threatened species, Exports, Imports, Reporting and recordkeeping requirements, Transportation.

Regulation Promulgation

PART 17—(AMENDED)
Accordingly, part 17, subchapter B of chapter I, title 50 of the Code of Federal Regulations, is hereby amended as set forth below:

1. The Authority citation for part 17 continues to read as follows:

Authority:16 U.S.C. 1361-1407; 16 U.S.C. 1531-1544; 16 U.S.C. 4201- 4245; Pub. L. 99-625, 100 Stat. 3500; unless otherwise noted.
50 CFR § 17.40
2. Section 17.40 is amended by revising paragraph (e) to read as follows:
50 CFR § 17.40

§ 17.40 Special rules—mammals.
* * * * *
(e) African elephant (Loxodonta africana)—(1) Definitions. For the purposes of this paragraph (e):

(i) African elephant shall mean any member of the species Loxodonta africana, whether live or dead, and any part or product thereof.

(ii) Raw ivory means any African elephant tusk, and any piece thereof, the surface of which, polished or unpolished, is unaltered or minimally carved.

(iii) Worked ivory means any African elephant tusk, and any piece thereof, which is not raw ivory.

(iv) Lip mark area means that area of a whole African elephant tusk where the tusk emerges from the skull and which is usually denoted by a prominent ring of staining on the tusk in its natural state.

(2) Prohibitions. Except as provided in the exceptions in paragraph (e)(3) of this section, it shall be unlawful for any person to:

(i) Import or export any African elephant,

(ii) Possess, sell or offer for sale, receive, deliver, transport ship, or export any African elephant which was illegally imported into the United States,

(iii) Sell or offer for sale any sport-hunted trophy imported into the United States in violation of permit conditions.

(3) Exceptions. (i) African elephants, other than sport-hunted trophies and raw and worked ivory, may be imported or

exported provided all permit requirements of 50 CFR parts 13 and 23 have been complied with.

(ii) Ivory. (A) Raw or worked ivory (other than sport-hunted trophies) may be imported only if:

(1) it is a bona fide antique of greater than 100 years of age on the day of import, or

(2) It was exported from the United States after being registered with the U.S. Fish and Wildlife Service.

(B) Worked ivory may be exported in accordance with the permit requirements of 50 CFR parts 13 and 23.

(C) Raw ivory may not be exported from the United States for commercial purposes under any circumstances.

(iii) Sport-hunted trophies may be imported into the United States provided:

(A) The trophy originates in a country for which the Service has received notice of that country's African elephant ivory quota for the year of export;

(B) All of the permit requirements of 50 CFR parts 13 and 23 have been complied with;

(C) A determination is made that the killing of the animal whose trophy is intended for import would enhance survival of the species; and

(D) The trophy is legibly marked by means of punch-dies, under a marking and registration system established by the country of origin, that includes the following information: Country of origin represented by the two-letter code established by the International Organization for Standardization (see appendix A to chapter I) followed by the registration number assigned to the last two digits of the year of registration and the weight of raw ivory to the nearest kilogram. Any mark must be placed on the lip mark area and indicated by a flash of color which serves as a background for such mark.

Dated: July 10, 1992.

John Turner,

Director.

(FR Doc. 92-18861 Filed 8-7-92; 8:45 am)

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68 FR 49512-02
NOTICES
DEPARTMENT OF THE INTERIOR
Fish and Wildlife Service

Draft Policy for Enhancement-of-Survival Permits for Foreign Species Listed Under the Endangered Species Act

Monday, August 18, 2003

***49512** AGENCY: Fish and Wildlife Service, Interior.

ACTION: Notice.

SUMMARY: We, the Fish and Wildlife Service, (the FWS) announce a Draft Policy for "Enhancement of Survival" permits for foreign species listed under the Endangered Species Act of 1973, as amended (ESA). This policy would provide guidance under which we will consider the issuance of Section 10(a)(1)(A) enhancement-of-survival permits as incentives to encourage conservation of foreign-listed species in the wild. Permits to allow the import of foreign-listed species or their parts or products would only be considered in certain limited situations if such action enhances the survival of the species in the wild. Enhancement must be demonstrated through support of a substantive conservation program for that species in the range country with a positive benefit for the species and/or its habitat. The in-situ conservation actions envisioned by implementing this policy otherwise would not occur or would be significantly reduced, absent the issuance of permits to encourage range countries to develop and implement such programs or to encourage applicants within the United States to become active participants in range country conservation actions.

The ESA and existing regulations provide full authority for issuance of these permits. However, in the past we have generally chosen to limit these types of permits for ESA-listed foreign species. We now believe there could be a greater conservation benefit by providing for the import and export of carefully selected ESA-listed foreign species, or their parts and products, that are obtained from captive-breeding programs or well-managed conservation programs that limit removal from the wild and further promote and advance the conservation of the species within range countries.

This draft policy presents guidance to help the public understand the requirements for issuance of permits under the ESA. It is not intended to be prescriptive or to necessarily prohibit or allow any public or private activity. We seek public comment on this proposed draft policy.

DATES: Comments on the draft policy must be received by October 17, 2003.

ADDRESSES: Send any comments or materials concerning the Draft Policy for Enhancement-of-Survival Permits for Foreign Species to the Chief, Division of Management Authority, U.S. Fish and Wildlife Service, 4401 North Fairfax Drive, Room 700, Arlington, Virginia 22203 (Telephone, 703-358-2093; fax, 703-358-2280; e-mail, ManagementAuthority@fws.gov).

Comments received will be made available to the public and become part of the file for this policy. You may examine comments and materials received during normal business hours at the above address in Arlington, Virginia. You must make an appointment to examine these materials.

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FOR FURTHER INFORMATION CONTACT: Kenneth Stansell, Assistant Director, International Affairs. (Telephone, 202-208-6393).

SUPPLEMENTARY INFORMATION:

The Application of the Endangered Species Act to Foreign Species Conservation

Approximately 40 percent of all species listed under the ESA are foreign species whose natural range occurs outside the United States. Of these, approximately 80 percent are listed as endangered and 20 percent are listed as ***49513** threatened. Under the ESA's listing process, foreign and domestic species are treated equally, and the biological criteria used for determining the appropriate classification of threatened or endangered species are the same. However, most of the key conservation provisions of the ESA do not apply to foreign species. Habitat conservation planning mechanisms, recovery planning and implementation, most Section 7 consultations, and the Section 6 grant-in-aid program do not apply to ESA-listed foreign species. Even the fundamental conservation tool of prohibition of take (defined by the ESA as killing, capturing, collecting, harassing, and related activities) is limited to actions taken within the United States, the territorial seas of the United States, or on the high seas (i.e., when committed by persons under the jurisdiction of the United States). In some situations, listing under the ESA may provide few, if any, additional benefits and may complicate the implementation of conservation initiatives under other international authorities, such as the Convention on International Trade in Endangered Species of Wild Fauna and Flora (CITES).

The ESA specifically addresses foreign species under Sections 8 and 8A by providing the authority to allow for international convention implementation for CITES and to enter into other such treaties, and to otherwise cooperate with other countries for the purpose of conserving listed species. We have been able to use these authorities to encourage conservation of ESA-listed foreign species in certain countries where bilateral conservation programs have been developed, such as the Pakistan markhor example cited below. However, opportunities for such activities are limited in comparison to the larger number of ESA-listed foreign species and the many countries of the world in which they occur. Where these programs occur, range countries retain ultimate responsibility and authority for implementing conservation measures for their resident species.

Several other domestic measures, such as the African Elephant Conservation Act and the Wild Bird Conservation Act, work to encourage the conservation of foreign species also listed under the ESA. Under certain conditions, these statutes allow for the sustainable use and/or management of foreign species and recognize the limited, ancillary nature of the United States's ability to influence foreign species conservation.

Ultimately, the incentives that the United States can employ to encourage conservation activities for foreign species in other countries are limited, and we need to consider the use of every possible means available. In practical terms, one of the few available means for encouraging the conservation of foreign endangered species is through our decisions about whether to issue import permits. Permits can be issued for purposes of scientific research or the enhancement of survival for endangered species. For threatened species, permits can be issued for those same purposes as well as for zoological exhibition, educational purposes, or special purposes consistent with the purposes of the ESA. The FWS goal of using the permits program to promote the long-term conservation of animals, plants, and their habitats is outlined in a recent publication, "Leaving a Lasting Legacy" (http://permits.fws.gov).

However, this permitting authority is not being fully used even though it is internationally recognized as one of the most effective conservation tools employed by CITES and other multilateral international agreements. Implementing this policy could encourage proactive conservation through the use of "enhancement of survival" findings to allow for imports that result from programs that significantly advance the conservation of a species within a given range country.

This concept is consistent with a Federal District Court's rationale in Defenders of Wildlife, Inc. v. Watt (1981), which upheld our decision to lift a prior ban on the importation of kangaroo parts and products in recognition of and in response to kangaroo conservation activities undertaken by Australia. The court found that the "application of the Act to the kangaroo is necessarily collateral in nature, and the well-being of the species can only be ensured by the government of Australia." Further, the court ruled that "while the Defendants have some resources at their disposal (e.g., import restrictions), to

effectuate the Act, the effectiveness of these resources depends on Defendants' ability to encourage Australia to protect the kangaroo." The potential for removal of the import ban then imposed under the ESA was an important aspect of these negotiations. It was used by the United States as an incentive for the imposition of a more rigorous and meaningful conservation program by Australia.

In Defenders, the court recognized that we had no control over the species or its natural habitat. Consequently, our ability to protect the kangaroo was limited to encouraging, or creating incentives for Australia to implement programs designed to ensure the species' well-being. Since the United States was an important market for kangaroo leather parts and products, our decision to lift the import ban was essential to encourage Australia to implement stricter conservation measures for kangaroos. Lifting the ban ultimately enhanced the status of the kangaroo in Australia and achieved the conservation objectives of the ESA for the species.

CITES and the Endangered Species Act as Conservation Tools

Many foreign species of concern to the United States are protected not only under the ESA but, also under CITES, a related but distinct conservation tool that regulates the international trade in certain wild plants and animals. Under CITES, species may be included, after approval by a two-thirds majority of CITES parties, in one of two Appendices, depending on the degree to which international trade impacts the survival of the species. Appendix I includes species "threatened with extinction" and imposes a general ban on trade for primarily commercial purposes. Appendix II allows controlled commercial trade in species that may become threatened with extinction without such controls. The import of an Appendix-I species is allowed if the purpose of the import is not primarily commercial and is not considered to be detrimental to the survival of the species. The import of an Appendix-II species is allowed if the species or its parts and products have been legally acquired and the export is not considered to be detrimental to the survival of the species. Thus, in all cases CITES requires that a "no detriment" finding be made for each species and country involved, and that appropriate CITES permits be issued.

The text of the CITES treaty provides for certain exemptions from the restrictions on commercial trade in Appendix-I species. Through more than 20 years of interpretation and implementation, the CITES parties have agreed that the treaty provides significant flexibility in determining what kinds of activities are considered to be detrimental to the survival of Appendix-I species. Article VII, paragraph 4, of the treaty provides that Appendix-I species meeting the CITES definitions of "bred in captivity" or "artificially propagated" may be treated as if they are listed in Appendix II, removing the ban on commercial trade. Likewise, under certain conditions and with established quotas, CITES allows ***49514** the export of sport-hunted trophies of Appendix-I species. While trade in such species may not be detrimental, and noncommercial trade can be allowed, the CITES treaty includes no requirement that such actions directly address the issue of enhancing the conservation of the species in the wild.

CITES also allows for the transfer from Appendix I to Appendix II of certain populations of species that can be demonstrated to benefit from "ranching," for purposes of trade. A ranching operation must primarily benefit conservation of local populations of the species in the wild. Ranching involves the development of a management program for a specific population of an Appendix-I species, such as Nile crocodiles in Zimbabwe. Under this program, crocodile eggs are taken from the wild and hatched in captivity, and then some juvenile crocodiles are returned to the wild, while others are retained for commercial activity. This provides an incentive to protect and recover the wild population.

For native species listed under the ESA, the Congress has directed that they be automatically protected from take, in addition to prohibitions against commerce and trade. A foreign ESA-listed species is protected from importation into the United States and from foreign commerce by American citizens, but not from take by an American within a foreign country. This reflects the limited extent to which domestic U.S. law applies overseas. We have a very different degree of control, and thus a very different ability to influence conservation, in other sovereign countries that have their own national laws and policies.

The ESA also provides us with permitting authority in Section 10(a)(1)(A) to allow for otherwise prohibited activities for listed species. This authority allows for the issuance of permits "for scientific purposes, or to enhance the propagation or survival" of the listed species, as well as other purposes for threatened species. The net result is that the ESA imposes

different and more stringent permitting standards for the importation of an endangered species than is required under Appendix I of CITES. Under CITES, the issue is whether the importation of an Appendix-I foreign species is not detrimental to the survival of the species. Under the ESA, the issue is whether the importation of a foreign species enhances the survival of the species.

Special Rule Authority for Foreign Species Listed as Threatened

The ESA allows for the promulgation of special rules under Section 4(d) for threatened species. Special rules can be used to authorize permits for activities consistent with the specific conservation needs of a species and may be less restrictive than for endangered species. Using this Section 4(d) authority, we have issued regulations to allow for the importation of sport-hunted trophies of certain foreign species listed as threatened. Likewise, we have lifted restrictions on the import of products from several foreign species listed as threatened when we determined that lifting the import ban would be an incentive for the development of a more rigorous conservation program in the range state.

Examples of the use of the special rule authority include African elephants and saltwater crocodiles. The African elephant is listed as threatened with a special rule that allows for the import of sport-hunted trophies where it can be clearly demonstrated that the range country has established and is implementing a conservation program using regulated sport hunting as a tool to enhance the survival of the species. Several species of salt water crocodiles from Africa and Australia are listed as threatened with a special rule that allows the import of crocodile parts and products from certain managed populations to encourage and help create an incentive for the development of more rigorous conservation programs in affected range countries.

The need exists to address legitimate conservation issues affecting foreign ESA-listed species on a case-by-case basis, without sole reliance on a reclassification from endangered to threatened status so that Section 4(d) may be applied. The benefits of an innovative conservation program should not be limited solely to species that have already met the standard for reclassification to threatened status. Based on our experience in international conservation efforts, we believe that in some limited situations, the only way for the United States to participate in programs to improve the status of an endangered species is to allow import of specimens, parts, or products from well-regulated taking programs, if the programs are designed to promote conservation of the species in the wild. By making such determinations on a case-by-case basis, we expect that issuance of such permits will facilitate further conservation efforts that could lead to reclassification of a species from endangered to threatened, or off the ESA list completely.

Enhancement Findings for Foreign Species Listed as Endangered

As indicated, we have been able to make the necessary "no detriment" CITES finding and the ESA's "enhancement of survival" finding for some activities that involve the direct removal of individuals from the wild for several foreign species listed in Appendix I that are also listed as threatened under the Act. While Section 10(a)(1)(A) of the ESA actually allows for the issuance of import permits to enhance the survival of foreign species listed as endangered, if the necessary enhancement finding can be made, we have historically interpreted the enhancement standard for foreign endangered species fairly narrowly. This practice has resulted in the routine denial of applications for the import of foreign species listed as endangered if the import would cause the killing of any individual in the wild, even in those situations involving a CITES-approved export program or other substantive conservation program. This has included the denial of applications for the import of parts and products from ranched populations, import of specimens meeting CITES requirements for specimens bred in captivity or artificially propagated for commercial purposes, sport-hunted trophies from countries with CITES-approved quotas for the species involved, and international movement of live zoological specimens.

The traditional, narrow approach to enhancement findings for actions that would result in the killing or removal from the wild of a foreign endangered species has precluded the use of the import permit as a proactive tool and incentive for foreign species conservation. We now believe that in some situations we could achieve a greater conservation benefit by providing for the importation of carefully selected foreign endangered species, or threatened species lacking (or in lieu of) a Section 4(d) rule, in exchange for a substantive and comprehensive conservation plan that offsets a limited take and further promotes

the conservation of the species within the range country. An enhancement finding could be used as a more flexible proactive conservation tool to encourage the development of such substantive conservation plans for foreign species listed as endangered. Such an approach would help us expand the effectiveness of the ESA in meeting the growing habitat protection needs of foreign wildlife. Further, by *49515 limiting the scope of such enhancement-of-survival findings to the development and implementation of foreign species management plans by the relevant range country, we can create a real incentive for foreign nations to establish programs that conserve both wildlife and habitat through the use of this approach in the most appropriate and compelling situations.

Examples of Potential Application

Several current examples serve to illustrate the potential application of this new proposed enhancement-of-survival policy. These include the Morelet's crocodile in Mexico; the Asian bonytongue fish in Indonesia, Thailand, and Malaysia; the wood bison in Canada; the markhor in Pakistan; and the Asian elephant in India, southeast Asia, and China. These examples represent species with similar listing status under the ESA but significantly different conservation issues and opportunities under the proposed policy.

Morelet's Crocodile

The Morelet's crocodile (Crocodylus moreletii) is a freshwater crocodile found along the Atlantic coast of Mexico, Guatemala, and Belize. It is listed as endangered throughout its entire range and is also listed in Appendix I of CITES. These listing actions were deemed warranted due to substantial population declines as a result of habitat loss and poaching. All three range countries have enacted laws protecting the Morelet's crocodile within their territories. However, given the current population status and continuing threats, it is doubtful that the species would qualify under the ESA for reclassification.

Part of Mexico's conservation program for this species allows a regulated removal of live specimens from the wild to establish parental stock for captive-breeding operations. This practice is part of a comprehensive conservation and management program for Morelet's crocodiles, which includes sustainable use of the species to encourage its conservation. As part of that program, a significant number of young are annually returned to the wild, and enhancement actions are focused on the wild populations. As a result of this management program, Mexico had been able to register its captive-breeding facilities with CITES to allow international commercial trade. In the case of specimens originating from CITES-registered breeding facilities, the species is treated as a CITES Appendix-II species, and, therefore, only a CITES export permit issued by the exporting country is necessary. However, this international trade is still excluded from the United States because of the species' endangered status under the ESA.

The FWS recognizes that crocodilian species managed as a sustainable resource in some cases can be utilized for commercial purposes while not adversely affecting the survival of the species. When certain positive conservation conditions have been met, we have acted to allow utilization and trade from managed populations of the American alligator (Alligator mississippiensis), Nile crocodile (Crocodylus niloticus), and saltwater crocodile (Crocodylus porosus). Under the proposed policy, we would consider allowing the importation of products produced by these captive-breeding facilities if they can demonstrate a clear enhancement of the wild population. The potential for trade with the United States, a major importer of leather products, could further encourage Mexico to intensify its conservation efforts for this species in the wild to meet the stricter import requirements under the ESA.

Straight-horned Markhor

The Pakistan population of straight-horned markhor (Capra falconeri jerdoni) is listed as endangered under the ESA and included in Appendix I of CITES. A sport-hunted export quota for Pakistan was approved by CITES in 1997. While reclassification of the subspecies within Pakistan under the ESA is not considered likely due to continuing concerns about the overall status of the subspecies, the Torghar Hills region of Pakistan has a successful community-based management program that has significantly enhanced the conservation of local markhor populations. Under this example, this proposed policy could allow consideration of applications for the importation of sport-hunted trophies from this population, if the necessary

enhancement finding could be made, as an incentive to continue and expand the conservation program for this species.

In the early 1980s, local leaders of the Baluchistan Province became alarmed at the dramatic decline in markhor and other wildlife populations in the Torghar Hills region. The decline was attributed to a significant increase in poaching. In 1984 they sought assistance from professional wildlife biologists in the United States on the design of a scientifically based management program for the markhor and other species, and the Torghar Conservation Project was initiated. The project was simple. Local tribesmen were requested to refrain from hunting in exchange for being hired as salaried game guards to prevent poachers from entering the Torghar Hills region. Game guard salaries and other costs of the project would be defrayed entirely by trophy fees paid by foreign hunters to take a small, strictly controlled, annual quota based on the best biological information available on the status of the markhor and other wildlife species in the area.

Currently, the project employs more than 50 local game guards, protecting approximately 1,000 km^2 of habitat. The project has eliminated poaching in this core protection area, and, as a result, markhor populations, virtually extirpated by 1984, have increased steadily. Since 1994, the markhor population has doubled and is considered to be of adequate size and condition to sustain a small (1-2% of the population) annual trophy harvest. Systematic field surveys have been conducted in the region since 1994 as part of the management program, supported in part by the FWS through its Wildlife Without Borders-India program. The project was maintained informally until 1994, when an officially registered non-governmental organization, the Society of Torghar Environmental Protection (STEP), was established to administer the project. Currently participation in this program is limited to foreign hunters primarily from Europe. Allowing a limited number of U. S. hunters an opportunity to import trophies taken from this population could provide a significant increase in funds available for conservation and would provide a nexus to encourage continuation and expansion of the project into other areas.

Asian Bonytongue

The Asian bonytongue (Scleropages formosus) is a tropical freshwater fish native to Indonesia, Thailand, and Malaysia, and islisted as endangered under the ESA and included on Appendix I of CITES. Although the species was historically harvested for consumption, its demand for the aquarium pet trade, along with other factors such as habitat loss, resulted in significant declines throughout its range. Reclassification of the species under the ESA is not likely due to continuing concern for its overall status. However, since the greatest single threat to the species is illegal collection for the pet trade, captive propagation that results in a controlled legal supply of specimens could significantly reduce the pressure on wild populations. Additionally, the breeding of native species in captivity for commercial ***49516** purposes may, in some cases, facilitate the eventual release to the wild of a percentage of the progeny from such operations.

In 1986, efforts began on the development of captive propagation techniques for the Asian bonytongue. In 1992, the first captive-breeding facility was registered under the requirements of CITES, and legal exports began. There are currently 28 registered breeding facilities in these three countries, reportedly with an annual production level of around 300,000 fish. Each exported specimen is marked with a coded microchip to assist law enforcement efforts to help ensure that only legally produced fish are traded. The CITES requirement for certifying facilities as bred in captivity is designed to remove collection pressure on wild populations and ensure that trade is not detrimental to the survival of the species, but CITES does not require in-situ conservation projects.

Since the approval of the first captive-breeding facility, we have denied several permit applications for the import of captive-bred Asian bonytongue. As one of the world's largest importers of aquarium fish, the United States could play a significant role in encouraging conservation of the Asian bonytongue through the issuance of permits if we require, as a condition of issuance of an import permit, that the specimens are bred in captivity and, a program is established to conserve the species in the wild . Our willingness to consider allowing import of captive-bred fish under "enhancement of survival" permits could provide an incentive for development of new conservation programs.

Wood Bison

The wood bison (Bison bison athabascae), native to Canada, is currently listed in CITES Appendix II and as an endangered

species under the ESA. Because the wood bison is an Appendix-II species, Canadian wildlife authorities are not required to establish a quota for the export of live or trophy animals. Therefore, Canada is actively managing their bison population with a variety of management techniques, including limited sport-hunting. The FWS is currently evaluating whether downlisting the species is warranted under the ESA; however, this process is time consuming. Under this proposed policy, if an enhancement finding could be made based on Canada's present management practices, a limited number of sport-hunted trophies and live animals could be imported to further the conservation and recovery of the species while the downlisting process continues. A significant demand exists for both live animals and sport-hunted trophies in the United States. By issuing a limited number of permits that would require continuing conservation of the species in the wild the species would benefit.

The free-ranging population of about 5,000 wood bison is restricted to 11 herds in the Canadian provinces of Manitoba, Alberta, British Columbia, Yukon, and the Northwest Territories. As of 2000, approximately 2,500 of the free-ranging animals were in 7 disease-free herds. There are also around 400 animals in the Elk Island and Hook Lake Salvage captive-held disease-free herds that will be used for restocking and recovery purposes. The remaining bison in four herds in the Wood Buffalo National Park area are not disease free. It is estimated that the provincial and First Nation herds (diseased and disease-free combined) will double by 2004 at the present rate of increase. The Canadian recovery program goal is the establishment of 4 free-roaming, disease-free herds of 400 animals each. The recovery team estimates this goal will be achieved by the end of 2003. Throughout Canada and the United States, 700 to 1,000 animals are in private ownership. There are no wild or free-ranging populations in the United States.

The provincial and First Nation herds are managed with consideration for the national wood bison objectives: (1) Re-establish viable, healthy, free-ranging populations where possible in the original range; (2) ensure the genetic integrity of wood bison; (3) restore healthy herds for long-term sustainable use (for rural communities); and (4) encourage long-term cooperative management programs in which rural communities and aboriginal people play an integral role. Both the genetic management of the herds and the community programs involve limited sport hunting of surplus animals.

Because of the current listing of wood bison under the ESA, we have not issued import permits for sport-hunted trophies. Under this proposed policy, however, we could take into account Canada's excellent management of the bison. If, by reviewing the management program that has been established by the Canadian Government and the First Nations, we can determine that the importation of sport-hunted trophies could further enhance the survival of the species, then we could consider the issuance of a limited number of permits. As with most conservation programs around the world, work is limited by the availability of funds to carry out the goals of the program. Allowing a limited number of imports of sport-hunted trophies and live animals into the United States could provide a significant increase in funds available for conservation of the species in the wild, and would provide a nexus to encourage continuation and expansion of the project into other areas.

Asian Elephant

The Asian elephant (Elephas maximus) is listed as endangered under the ESA and in Appendix I of CITES. The Asian elephant historically ranged throughout India, Southeast Asia, and China. However, due to extensive habitat loss and poaching, its numbers have been dramatically reduced and are restricted to isolated populations within its range. In many areas, the species has been extirpated. Given its current status, it is very unlikely that the species could be downlisted under the ESA. In addition, although the Asian elephant is provided the protection of listing in Appendix I, only a limited number of other activities under CITES contribute to ensuring the species' survival. While the listing of the species in Appendix I does control international trade, this listing provides little for the conservation for the species within its range. Under this proposed policy, the permitting process could contribute to the enhancement of the species through the consideration of the importation of live animals when linked with conservation efforts within the elephant's range.

The Asian elephant is one of the more recognized animals to people from around the world due to exposure to the species through circuses and zoos. The United States has a relatively large population of captive Asian elephants. However, captive breeding has not been very successful, and the breeding stock is getting old and may soon be unable to breed. While offspring, particularly first generation, have been born, second-generation offspring have not had reproductive success.

Therefore, currently, given the breeding animals available, it would appear that the captive Asian elephant population within the United States will continue to decline. This decline has raised a significant demand among the zoo and circus community to obtain additional stock from Asia. In relation to this, the number of elephants available for export within Asia is increasing due to the capture of problem animals and the decline in the use of elephants for traditional labor, such as timber harvest. Many countries within the elephants' range are facing a crisis due to the inability to handle these "surplus" animals. ***49517**

Through the implementation of this proposed policy, it would be possible to contribute to the species' survival in the wild. By providing an opportunity for facilities within the United States to apply for and obtain import permits for Asian elephants, on the grounds that the importation provides direct conservation benefits to the wild population, the ESA could be used to promote in situ conservation projects that are funded and supported by U.S. zoos and circuses. In addition, under this proposed policy, export of live animals or genetic material to promote captive breeding in other countries could also be tied to conservation work within the species' natural range.

Other Listed Species

The species in the above examples are all listed as endangered under the ESA, however, we believe that certain threatened species could also benefit from this proposed policy. While it is true that a significant number of permits issued for threatened species are issued for other purposes, the FWS has denied permits for enhancement for these species. This policy could be used to promote and encourage activities that would provide for in-situ conservation programs for threatened, as well as endangered, species.

Policy on Permits for Enhancement of Survival

1. What Is the Purpose of This Policy?

This policy expands the conditions under which we will consider the issuance of import permits under Section 10(a)(1)(A) of the Endangered Species Act (ESA), and under our existing regulations found in the Code of Federal Regulations at 50 CFR 17.22 and 50 CFR 17.32 for enhancement of survival of foreign species listed under the ESA as endangered and threatened respectively. These permits would be available only in certain carefully limited situations where the range country and/or the applicants have established a substantive conservation program for the species and the import or export meets all relevant requirements and resolutions of the Convention on International Trade in Endangered Species of Wild Fauna and Flora (CITES). The ultimate goal of permits issued under this policy would be to provide incentives to encourage developing countries to conserve foreign ESA-listed species and their habitats, and to promote in situ conservation efforts by applicants.

This policy would provide incentives recognizing and supporting those range countries that have demonstrated significant commitment to implementing conservation programs for endangered species. Under this policy the necessary permit finding of "enhancement of survival" under the ESA would take into consideration the overall net impact, both direct and indirect, of allowing the import or export of the species or its parts or products, as offset by the implementation of a conservation program for that species in the range country.

The listing of a foreign species under the ESA provides recognition of its plight and generally prohibits the import of the species or its products into the United States. When such import would involve take of animals from the wild or commercial trade, the prohibition on import may be in conflict with ranching or captive-breeding operations that have been authorized by CITES. The opportunities to influence actual species conservation in other countries are limited, since key provisions of the ESA, such as recovery, consultation, and prohibitions on take, do not apply overseas. The application of the ESA to foreign species, and thus the United States' ability to influence their conservation, is collateral in nature, with range countries retaining ultimate authority and responsibility for species conservation. Moreover, the effectiveness of those tools that the ESA does provide for foreign species—such as import restrictions—often depends on whether their use can help encourage the range country to protect the species.

In recent years many developing countries have seen sustainable-use programs as the way to conserve wildlife species and

their habitats in the face of increasing competition with other land uses. We have used the flexibility provided for threatened species in Section 4(d) of the Act to adopt special rules allowing for imports of certain sport-hunted species, such as African elephants and leopards, and the import for commercial purposes of certain crocodile parts and products. Under this expanded policy, we will broaden this concept on a limited, case-by-case basis, through the issuance of Section 10(a)(1)(A) import permits for listed species—but only if the necessary enhancement-of-survival finding can be made, in addition to all of the findings required by the CITES treaty and any relevant resolutions adopted by CITES Parties for species also covered by CITES.

This policy would provide a mechanism to consider the issuance of permits under certain circumstances for carefully selected foreign ESA-listed species in response to a conservation plan that offsets any limited take from the wild and further promotes the conservation of the species. Such findings would serve to create a real incentive for foreign nations to establish programs that conserve both wildlife and their habitats. The policy limits the scope of such enhancement-of-survival findings to the development and implementation of management plans in the range country only in appropriate and compelling situations, and where applicants can show direct in-situ conservation benefit from the proposed activity. This policy would not apply to situations that were not fully consistent with CITES. It would also not apply where we have adopted or are developing a separate policy on import or export permits for a particular species (such as our Policy on Giant Panda Permits, published in the Federal Register on August 27, 1998; 63 FR 45839).

2. What Are the Permit Application Procedures and Issuance Criteria?

For consideration under this policy guidance, you must follow the current application process and issuance criteria as described in our regulations at 50 CFR part 17.22, for endangered species, and 50 CFR part 17.32, for threatened species. This application process is approved by the Office of Management and Budget (OMB) under the provisions of the Paperwork Reduction Act; the OMB control number is 1018-0093.In applying the issuance criteria for applications to import a listed species or its parts or products, we may take into account how that action may relate to the implementation of a management program for that species in the range country, including carefully regulated sport hunting and commercial captive breeding and ranching, and whether the activity has been authorized under CITES, when so listed.

Consistent with the ESA and 50 CFR 17.22, notice of each application for a permit for endangered species will be published in the Federal Register. Each notice will invite the submission from interested parties, within 30 days after the date of the notice, of written data, views, or arguments with respect to the application, prior to issuance of any enhancement-of-survival permit pursuant to this policy.

3. How Will This Policy Be Consistent With CITES Requirements and Resolutions or Range Country Management Plans?

For us to consider your permit application under this policy, at least ***49518** one of the following conditions must have been met:

a. The species (or certain populations of the species) is listed in CITES Appendix II, and all trade is in accordance with all requirements in CITES Article IV, as well as in accordance with any relevant resolutions adopted by the CITES Conference of the Parties; or

b. The species (or certain populations of the species) is listed in CITES Appendix I, and (1) sport-hunted trophies, or other specimens, are traded in accordance with all requirements in CITES Article III, as well as in accordance with all relevant resolutions and quotas adopted by the CITES Conference of the Parties and supported by the United States; or (2) commercial trade in ranched or captive bred specimens is in accordance with Article VII.4 of CITES and with any relevant clarifying resolutions and quotas adopted by the CITES Conference of the Parties; or

c. The species (or a certain population of the species) is covered under one or more conservation programs in the range country that have support of the relevant management authorities, and these programs contribute directly to enhance the

survival of the species in the wild.

4. What Benefit to the Species Must Be Shown?

In addition to the requirements of Part 3 above, you must also provide sufficient information for us to be able to reasonably conclude that a conservation program has been established in the range country for the species that is likely to provide a net benefit to the conservation of the species if the import of such species or its parts or products is allowed into the United States. You must also demonstrate that the application meets all the issuance criteria found in our regulations at 17.22(a)(2) and 17.32(a)(2), which among other things require that ". . . the purpose for which the permit is required would be likely to reduce the threat of extinction facing the species . . ." Inherent in this context is a substantial contribution to the conservation of the species in the wild, through direct or indirect means. Your application must involve an activity that meets the enhancement standard of Section 10(a)(1)(A) for any import finding for a listed species under the ESA, even in situations where such imports are not required to meet the CITES standard of "no detriment." For example, this will include a determination that imports of ranched and captive-bred specimens not only meet the requirements of Part 3 of this policy, but also must be derived from a program that provides for conservation of the species in the wild.

A conservation program in the range country must be designed to enhance the survival of a species in a manner and at a level such that the objective of the program is either to maintain, or restore, biologically viable population levels for the long term. The conservation program would address relevant determinations of the productive capacity of the species and its ecosystem, to ensure that cumulative use does not exceed those capacities or the ability of the population to reproduce, maintain itself, and perform its role or function in its ecosystem. The sustainability of the population may be accomplished through the implementation of conservation strategies, consistent with the biological characteristics of the species and will take into account instances where limited biological data exist. All determinations will be made on a case-by-case basis for each species.

Required Determinations

Since the purpose of this draft policy guidance is to clarify existing regulatory authority and provide the public with an opportunity for us to consider issuance of permits for certain activities, we have determined that this policy would not result in significant costs of implementation to the Federal Government or the non-Federal program participants. We have also determined that the issuance of the proposed policy is categorically excluded under the Department of the Interior's NEPA procedures in 516 DM 2 Appendix 1.10. Based on the Service's evaluation of the public comments received, if a determination is made that an environmental assessment is required in accordance with Departmental procedures, an environmental assessment will be prepared for public review.

Public Comments Solicited

We request comments on our Draft Policy on Enhancement of Survival Permits. Particularly sought are comments on the issue of the relationship of the ESA to foreign-listed species and ways in which the ESA can be used to encourage the conservation of such species in the range country. We will take into consideration the comments and any additional information received by the Service by date specified above in DATES.

Dated: June 27, 2003.

Steve Williams,

Director, Fish and Wildlife Service.

[FR Doc. 03-20941 Filed 8-15-03; 8:45 am]

Draft Policy for Enhancement-of-Survival Permits for Foreign..., 68 FR 49512-02

BILLING CODE 4310-55-P

End of Document

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Form No.	Estimated number of respondents	Estimated number of responses	Frequency of response	Average hours per response	Total estimated burden
HUD–52670–A Part 3				0.125	
HUD–52670–A Part 4				0.125	
HUD–52670–A Part 5				0.125	
HUD–52670–A Part 6				0.125	
Total HUD–Form 52670	22,731	272,772	Monthly	1.125	306,869
HUD–52671–A	321	3,852	Monthly	1.33	5,123
HUD–52671–B	11	132	Monthly	1.33	176
HUD–52671–C	2,742	44,904	Monthly	1.33	59,722
HUD–52670–D	38	456	Monthly	1.33	607
HUD–92742	12	12	Annually	.50	6
HUD–92743a	12	12	Annually	.25	3
Total	25,867	322,140			372,506

B. Solicitation of Public Comment

This notice is soliciting comments from members of the public and affected parties concerning the collection of information described in Section A on the following:

(1) Whether the proposed collection of information is necessary for the proper performance of the functions of the agency, including whether the information will have practical ntility;

(2) The accuracy of the agency's estimate of the burden of the proposed collection of information;

(3) Ways to enhance the qnality, utility, and clarity of the information to be collected; and

(4) Ways to minimize the burden of the collection of information on those who are to respond; inclnding through the use of appropriate automated collection techniques or other forms of information technology, e.g., permitting electronic submission of responses.

HUD encourages interested parties to submit comment in response to these questions.

Authority: Section 3507 of the Paperwork Reduction Act of 1995, 44 U.S.C. Chapter 35.

Dated: May 6, 2014.

Colette Pollard,

Departmental Reports Manager.

[FR Doc. 2014–10868 Filed 5–9–14; 8:45 am]

BILLING CODE 4210–67–P

DEPARTMENT OF THE INTERIOR

Fish and Wildlife Service

[FWS–HQ–IA–2014–N086; FXIA16710900000–145–FF09A30000]

Interim Suspension of Imports of Elephant Trophies From Zimbabwe

AGENCY: Fish and Wildlife Service, Interior.

ACTION: Notice of Interim Suspension on Importation of Zimbabwean Elephant Trophies.

SUMMARY: On April 4, 2014, the U.S. Fish and Wildlife Service (Service) announced an interim suspension on importation of sport-hunted African elephant trophies taken in Zimbabwe during the 2014 season (on April 17, 2014, the Service revised this finding, primarily to clarify that the suspension applied only to elephants hunted on or after April 4, 2014). The decision to suspend importation of African elepbant trophies taken in Zimbabwe was due primarily to the Service having insufficient information on the status of elephants in Zimbabwe and the current management program in Zimbabwe to determine that the killing of the animal whose trophy is intended for import into the United States wonld enhance the survival of the species.

DATES: The temporary suspension described in this docnment went into effect April 4, 2014, and will remain in effect until we provide further notice.

ADDRESSES: Timothy J. Van Norman, Chief, Branch of Permits, Division of Management Authority, U.S. Fish and Wildlife Service, 4401 North Fairfax Drive, Room 212, Arlington, VA 22203; fax (703) 358–2280; or email *DMAFR@fws.gov*.

FOR FURTHER INFORMATION CONTACT: Timothy J. Van Norman, (703) 358–2104 (telephone); (703) 358–2280 (fax); *DMAFR@fws.gov* (email).

SUPPLEMENTARY INFORMATION:

Background

The African Elephant (*Loxodonta africana*) is listed as threatened under the Endangered Species Act (ESA), 16 U.S.C. 1531 *et seq.*, and is regulated under a special rule fonnd at 50 CFR 17.40(e). The special rule includes specific requirements for the import of sport-hunted trophies, including marking requirements for ivory. Under § 17.40(e)(3)(iii)(C), in order for the U.S. Fish and Wildlife Service (Service) to authorize the import of a sport-hunted elephant trophy, the Service must find that the killing of the animal whose trophy is intended for import into the United States would enhance the survival of the species.

Zimbabwe has had an active elephant hunting program for more than 20 years and imports of elephant trophies into the United States have occurred at least since 1997, when the Zimbabwe elephant popnlation, along with popnlations in Botswana and Namibia, was downlisted to Appendix II of the Convention on International Trade in Endangered Species of Wild Fauna and Flora (CITES). When the population was downlisted, the Service published a **Federal Register** notice that acknowledged that, as these elephants were classified as an Appendix II population, no U.S. import permit would be required to import trophies. However, we did state that in accordance with the special rule under the ESA, the requirement for an enhancement finding wonld continue to apply (62 FR 44627, 44633, August 22, 1997). In that **Federal Register** notice, we stated that in making the required enhancement finding for import of sport-hunted trophies, the Service would review the status of the elephant population and the total management program for elephants in each country to ensure the program was promoting the conservation of the species. The notice also stated that the Service would make such findings on a periodic basis upon receipt of new information on the species' population or management. If, based on new information, the conditions of the special rule are no longer met, the Service explained that it would publish a notice in the **Federal Register** of any change.

Need for Current Data

Although African elephant conservation issues have received significant attention within CITES over the last 10 or more years, the Service

has limited information on elephant management programs, efforts to control poaching, and the effects of legal hunting in Zimbabwe. While the Service is aware of a 1997 national elephant management plan, we are not aware of any updates to the plan, or whether an adaptive management approach has been taken in implementing the plan. In 2007, the Service sent a letter to the Parks and Wildlife Management Authority of Zimbabwe requesting additional information. While we did receive some information at that time, we have not received any additional updates directly from government officials since that time. Service representatives have met in person with Zimbabwean representatives at various times in the past 6 years, but again, little new or additional information has been obtained. As stated, with African elephants being a prominent species within CITES discussions, the Service has received information through documents produced in association with CITES activities. However, this information has focused more on the ivory trade and poaching, with less about regulatory mechanisms in place that would allow for appropriate management of elephants, sustainable utilization of elephants, and how elephant management is integrated into human communities to reduce human–elephant conflicts and support elephant populations.

According to the International Union for Conservation of Nature *(IUCN) Species Survival Commission, African Elephant Database report "2013Africa"*, the elephant population in Zimbabwe in 2007 was 84,416, but as of 2013, that population had been reduced to 47,366. However, until very recently, the Government continued to provide population estimates exceeding 100,000 elephants. The summary in the IUCN report indicates that, of recent surveys, only about 1% of the country has been covered by more reliable aerial or ground surveys for population estimates, while about 50% was covered by less accurate sample counts or dung counts. For a substantial portion of the country, no recent surveys have occurred, and most estimates are based on 2001 fignres. Even problem areas such as Hwange National Park where poaching appears to have significantly reduced the numbers of elephants do not appear to have been surveyed since 2001.

Several areas that were covered in the current surveys (2006–2010) indicate a substantial decline in the population; whether this decline is related to habitat degradation or poaching is unknown. Figures presented at the 16th Meeting of the Conference of the Parties to CITES in Bangkok, Thailand, March 3–14, 2013, indicates that, from 2002–2011, the number of elephants illegally killed annually increased significantly. While the numbers for 2012 and 2013 are not yet available, the trend would indicate a higher percentage of illegal killings and a population in decline. However, without further information, the Service is unable to determine the reliability of these numbers and what influence such a decline, if accurate, is having on the elephant population and its habitat in Zimbabwe.

The Service recognizes that Zimbabwe has established the Parks and Wild Life Act, as well as other laws and regulations, which provide a strong legal basis for regulating utilization and management of elephants within the country. However, with the limited information available to the Service at the time the decision to suspend imports occurred, it is not clear if resources and governance are adequate to successfully implement and enforce the established regulations. Based on available information, it appears that the Zimbabwe Parks and Wildlife Department receives no funding from the central Zimbabwean Government and must rely primarily on hunting revenues. A 2013 CITES Panel of Experts raised concerns as to the status of the Zimbabwe Parks and Wildlife Department relating to its weak financial base, lack of management skills, inadequate and old equipment, and poor infrastructure. However, the Service has little information as to funding levels or the available financial base, management skills, equipment, or infrastructure.

Without current data on population numbers and trends, government efforts to manage elephant populations, government efforts to address human-elephant conflicts and poaching, and the state of the hunting program within the country, the Service is currently unable to make a finding that sport-hunting in Zimbabwe is enhancing the survival of the species and that imports of trophies from that sport hunting would meet the criteria established under the ESA for African elephants. However, we recognize that our inability to make a finding is based primarily on a lack of information, not on specific information that shows that Zimbabwe's management is not enhancing the survival of the species. Therefore, the Service is actively pursuing additional information from the Government of Zimbabwe, as well as other sources, in an effort to make a final determination on whether African elephant sport-hunted trophies taken in 2014 could be imported into the United States.

Recent Action

Until sufficient additional information can be obtained, the Service has established an interim suspension on imports of elephant trophies taken from Zimbabwe on or after April 4, 2014, the date the suspension was announced through a press release and posting on the Service's Web page. Until the Service is able to issue a finding that the sport hunting of African elephants in Zimbabwe enhances the survival of the species, U.S. hunters are on notice that, while no ESA permit is currently required for the import of sport-hunted trophies, such imports cannot occur at this time. The current enhancement finding has been posted at *http://www.fws.gov/international/pdf/enhancement-finding-2014-elephant-Zimbabwe.PDF*. In addition, the press release announcing the interim suspension and frequently asked questions is available at on the Service's Web page (*www.fws.gov/international*).

The Service has requested the information necessary to make a final decision from the Government of Zimbabwe. After the Service has an opportunity to review new information and obtain additional information, if necessary, we will make a final decision. If the Service finds that sport hunting of African elephants in Zimbabwe enhances the survival of the species, the suspension will be lifted. If, after reviewing the new information, the Service finds that sport hunting of African elephants in Zimbabwe does not enhance the survival of the species, the suspension will continue until the Service receives new information in the future that would allow it to make a positive enhancement finding. Either way, the final finding will be published in the **Federal Register** and made available on the Service's Web page.

Interim Suspension

This suspension does not prohibit U.S. hunters from traveling to Zimbabwe and participating in an elephant hunt. The ESA special rule for African elephants does not prohibit take (e.g., hunting) outside the United States, but it does prohibit import of sport-hunted trophies unless all requirements have been met. Therefore, it is possible that a hunter that hunted in Zimbabwe and took an elephant after April 4 could import his or her trophy at a later date if the Service can determine in the final finding that imports meet the criteria under the ESA. Nonetheless, the Service cannot ensure that such imports will ever be authorized in the future.

Further, this suspension on imports does not affect elephant taken in Zimbabwe prior to April 4, 2014. Elephants hunted in previous hunting seasons are still eligible to be imported, provided all CITES and other import requirements are met.

Dated: May 7, 2014.

Timothy J. Van Norman,

Chief, Branch of Permits, Division of Management Authority, U.S. Fish and Wildlife Service.

[FR Doc. 2014–10890 Filed 5–9–14; 8:45 am]

BILLING CODE 4310–55–P

DEPARTMENT OF THE INTERIOR

Bureau of Land Management

[LLCON06000–L16100000.DQ0000]

Notice of Resource Advisory Council Meeting for the Dominguez-Escalante National Conservation Area Advisory Council

AGENCY: Bureau of Land Management, Interior.

ACTION: Notice of Public Meeting

SUMMARY: In accordance with the Federal Land Policy and Management Act of 1976 and the Federal Advisory Committee Act of 1972, the U.S. Department of the Interior, Bureau of Land Management (BLM) Dominguez-Escalante National Conservation Area (NCA) Advisory Council (Council) will meet as indicated below.

DATES: The meeting will be held on Wednesday, July 23, 2014, from 3 p.m. to approximately 6 p.m. Any adjnstments to this meeting will be posted on the Dominguez-Escalante NCA Resource Management Plan (RMP) Web site: *http://www.blm.gov/co/st/en/nca/denca/denca_rmp.html.*

ADDRESSES: The meeting will be held in Conference Room 40 at the Mesa County Central Services Bnilding, 200 S. Spruce Street, Grand Junction, CO 81501.

FOR FURTHER INFORMATION CONTACT: Collin Ewing, Advisory Council Designated Federal Official, 2815 H Road, Grand Junction, CO 81506. Phone: (970) 244–3049. Email: *cewing@blm.gov.* Persons who use a telecommunications device for the deaf (TDD) may call the Federal Information Relay Service (FIRS) at 1–800–877–8339 to contact the above individual during normal business hours. The FIRS is available 24 hours a day, seven days a week, to leave a message or question with the above individnal. You will receive a reply during normal business hours.

SUPPLEMENTARY INFORMATION: The 10-member Council advises the Secretary of the Interior, through the BLM, on a variety of planning and management issues associated with the RMP process for the Dominguez-Escalante NCA and Dominguez Canyon Wilderness.

Topics of discussion during the meeting may include informational presentations from various resource specialists working on the RMP as well as Council reports on the following topics: recreation, fire management, land-use planning process, invasive species management, travel management, wilderness, land exchange criteria, cultural resource management and other resource management topics of interest to the Council that were raised during the planning process.

These meetings are anticipated to occur quarterly and may occur as frequently as every two weeks during intensive phases of the planning process. Dates, times and agendas for additional meetings may be determined at future Council meetings and will be published in the **Federal Register**, announced through local media and on the BLM's Web site for the Dominguez-Escalante planning effort, *www.blm.gov/co/st/en/nca/denca/denca_rmp.html.*

These meetings are open to the public. The public may present written comments to the Council. Each formal Council meeting will have time allocated at the middle and end of each meeting to hear public comments. Depending on the number of persons wishing to comment and time available, the time for individual oral comments may be limited at the discretion of the chair.

Ruth Welch,

BLM Colorado Acting State Director.

[FR Doc. 2014–10786 Filed 5–9–14; 8:45 am]

BILLING CODE 4310–JB–P

DEPARTMENT OF THE INTERIOR

Bureau of Land Management

[LLNVC02000 L57000000.BX0000; 241A; MO# 4500063716]

Temporary Closures of Public Land in Washoe County, NV

AGENCY: Bureau of Land Management, Interior.

ACTION: Notice.

SUMMARY: As authorized under the provisions of the Federal Land Policy and Management Act of 1976, certain public land near Stead, Nevada, will be temporarily closed to all public use to provide for public safety during the 2014 Reno Air Racing Association Pylon Racing Seminar and the Reno National Championship Air Races.

DATES: The temporary closure periods are June 11 through June 14, 2014, and September 6 through September 14, 2014.

FOR FURTHER INFORMATION CONTACT: Leon Thomas, 775–885–6000, email: *l70thoma@blm.gov.* Persons who use a telecommunications device for the deaf (TDD) may call the Federal Information Relay Service (FIRS) at 1–800–877–8339 to contact Mr. Thomas during normal business hours. The FIRS is available 24 hours a day, 7 days a week, to leave a message or question for Mr. Thomas. You will receive a reply during normal business hours.

SUPPLEMENTARY INFORMATION: This closure applies to all public use, including pedestrian use and vehicles. The public lands affected by this closure are described as follows:

Mount Diablo Meridian

T. 21 N., R. 19 E.,
Sec. 8, E½E½, NW¼NE¼;
Sec. 16, SW¼SW¼NE¼, NW¼, W½SE¼.

The area described contains 450 acres, more or less, in Washoe County, Nevada.

The closure notice and map of the closure area will be posted at the BLM Carson City District Office, 5665 Morgan Mill Road, Carson City, Nevada and on the BLM Web site: *http://www.blm.gov/nv/st/en/fo/carsoncity_field.html.* Roads leading into the public lands under the closure will be posted to notify the public of the closure. Under the authority of Section 303(a) of the Federal Lands Policy and Management Act of 1976 (43 U.S.C. 1733(a)), 43 CFR 8360.9–7 and 43 CFR 8364.1, the Bureau of Land Management will enforce the following rules in the area described above: All public use, whether motorized, on foot, or otherwise, is prohibited.

Exceptions: Closure restrictions do not apply to event officials, medical and rescue personnel, law enforcement, and agency personnel monitoring the events.

Penalties: Any person who fails to comply with the closure orders is subject to arrest and, upon conviction, may be fined not more than $1,000 and/or imprisonment for not more than 12 months nnder 43 CFR 8360.0–7. Violations may also be subject to the provisions of Title 18, U.S.C. 3571 and 3581.

Authority: 43 CFR 8360.0–7 and 8364.1.

James W. Schroeder,

Acting Field Office Manager, Sierra Front Field Office.

[FR Doc. 2014–10834 Filed 5–9–14; 8:45 am]

BILLING CODE 4310–HC–P

Index of Information Produced by Conservation Force, ZPWMA, and AfESG
In Support of Re-Opening Import of Sport-Hunted Elephant Trophies from Zimbabwe

Date	Producer	Document
7/2/1997	FWS	Positive enhancement finding
4/4/2014	FWS	First questionnaire to ZPWMA
4/4/2014	FWS	Negative enhancement finding
4/17/2014	FWS	Negative enhancement finding revised
4/17/2014	ZPWMA	Response to April 4, 2014 questionnaire sent to FWS, including all attachments ("ZPWMA April 2014 Response")
5/30/2014	AfESG	Email from H. Dublin to R. Gabel, subject "Clarification regarding Zimbabwe data"
6/6/2014	CF	First comment on April 2014 enhancement finding and publication in the Federal Register, including all attachments ("CF June 2014 Comment")
6/25/2014	CF	Email to T. Van Norman forwarding email from E. Chidziya/ZPWMA regarding National Elephant Management Plan Workshop
7/22/2014	FWS	Negative enhancement finding
10/4/2014	R. Martin	Personal comment and attachments sent to FWS
10/21/2014	CF	First comment on July 2014 enhancement finding, including all attachments ("CF Oct. 2014 Comment")
10/31/2014	FWS	Second questionnaire to ZPWMA
11/3/2014	AfESG	Email from H. Dublin to T. Van Norman attaching AfESG letter/ comment on July finding ("AfESG Nov. 2014 Letter")
11/13/2014	CF	Email to T. Van Norman forwarding invitation to National Elephant Management Plan Workshop
12/1/2014	CF	Email to T. Van Norman forwarding Agenda for Plan Workshop
12/5/2014	CF	Email to T. Van Norman attaching PowerPoint with survey results
12/5/2014	CF	Email to T. Van Norman summarizing outcomes of Plan Workshop
12/10/2014	ZPWMA	Response to October 31, 2014 questionnaire sent to FWS, including all attachments ("ZPWMA Dec. 2014 Response")
12/15/2014	CF	Second comment on July 2014 enhancement finding, including all attachments ("CF Dec. 2014 Comment")
12/16/2014	CF	Email to T. Van Norman forwarding CAMPFIRE Workshop proceedings
12/23/2014	CF	Email to T. Van Norman forwarding national Plan Workshop Proceedings
1/6/2015	CF	Email to T. Van Norman forwarding comments from the authors of the Save Valley Conservancy 2013 survey
1/12/2015	CF	Email to T. Van Norman forwarding invitation to Mana Pools Elephant Management Plan Workshop
1/19/2015	CF	Third comment on July 2014 enhancement finding, attaching Lodzi Hunters and Charlton McCallum Safari documents to substantiate enhancement/community investment ("CF. Jan. 2015 Comment")
1/23/2015	CF	Email to T. Van Norman with comment cover letter
3/3/2015	CF	Email to T. Van Norman forwarding article on ZPWMA anti-poaching success
3/11/2015	CF	Email to T. Van Norman attaching recent CITES/MIKE update

Index of Information Produced by Conservation Force, ZPWMA, and AfESG
In Support of Re-Opening Import of Sport-Hunted Elephant Trophies from Zimbabwe

Date	Producer	Document
3/11/2015	CF	Email to T. Van Norman forwarding invitation to rescheduled Mana Pools Elephant Management Plan Workshop
3/26/2015	FWS	Negative enhancement finding ("Finding")
4/13/2015	CF	Email to T. Van Norman forwarding article regarding effect of FWS suspension on CAMPFIRE
5/4/2015	CF	Email to T. Van Norman forwarding invitation to Sebungwe Elephant Management Plan Workshop
5/4/2015	CF	Email to T. Van Norman forwarding preparatory document for Sebungwe Workshop
5/5/2015	CF	Email to T. Van Norman forwarding study on elephant in the Sebungwe range
5/5/2015	CF	Email to T. Van Norman forwarding Mana Pools Workshop Proceedings
5/8/2015	CF	Email to T. Van Norman forwarding agenda for Sebungwe Workshop
5/11/2015	CF	Email to T. Van Norman forwarding background document on elephant populations in the Sebungwe range
5/12/2015	FWS	Third questionnaire to ZPWMA
5/14/2015	CF	Email to T. Van Norman forwarding fact sheet on Sebungwe Workshop
6/15/2015	CF	Email to T. Van Norman forwarding DAPU First-Quarter Report
7/20/2015	ZPWMA	Response to May 12, 2015 questionnaire sent to FWS, including all attachments ("ZPWMA June 2015 Response")
9/30/2015	CF	Email to T. Van Norman forwarding South East Lowveld Workshop Proceedings
11/30/2015	CF	Email to T. Van Norman forwarding A. Pole/AWF email describing Cabinet subcommittee meeting
11/30/2015	CF	Email to T. Van Norman forwarding email from L. Taylor regarding anti-poaching efforts in Sebungwe range (confidential)
12/1/2015	CF	Email to T. Van Norman forwarding analysis of income to CAMPFIRE districts from licensed, regulated hunting ("CAMPFIRE Income Analysis")
12/3/2015	CF	Email to T. Van Norman forwarding anti-poaching reports in the Mana Pools National Park area
12/7/2015	CF	Email to T. Van Norman attaching two presentations, one made by the CAMPFIRE Association and one made by Chief Chisunga of the Masoka Ward in the Mbire District
1/5/2016	CF	Email to T. Van Norman forwarding information about anti-poaching in the Zambezi Valley (confidential)
2/22/2016	CF	Email to T. Van Norman attaching article regarding ZPWMA ant-poaching success
2/24/2016	CF	Email to T. Van Norman including link to video regarding Bubye Valley Conservancy
2/29/2016	CF	Email to T. Van Norman forwarding final print of National Elephant Management Plan ("Plan")

Index of Information Produced by Conservation Force, ZPWMA, and AfESG
In Support of Re-Opening Import of Sport-Hunted Elephant Trophies from Zimbabwe

Date	Producer	Document
4/20/2016	CF	M. Pieters Blog Posts
4/20/2016	CF	Pro Safaris Report
4/20/2016	CF	B. du Preez, Bubye Valley Conservancy Lion Research Report
4/20/2016	CF	R. Groom, Hunting in Zimbabwe's Save Valley Conservancy
4/20/2016	CF	B. du Preez et al., Sport-Hunting and Lion (*Panthera leo*) Conservation in Zimbabwe
4/25/2016	CF	Email to T. Van Norman attaching article "Muchinguri speaks on Tsholotsho Jumbo ban"
5/2/2016	CF	Email to T. Van Norman attaching article on continued losses in Zimbabwe's hunting sector due to the FWS suspension
5/9/2016	CF	Email to T. Van Norman including link to video describing Charlton McCallum Safaris/DAPU's anti-poaching successes
5/9/2016	ZPWMA	Email to T. Van Norman attaching letter explaining use of elephant hunting funds
5/22/2016	CF	Email to T. Van Norman attaching press release for Houston Safari Club grant to the Tashinga Initiative
5/23/2016	CF	Email to T. Van Norman forwarding DAPU's First Quarter Report
7/18/2016	CF	Email to T. Van Norman forwarding email from D. Cumming confirming "go-ahead" to prepare Supplemental Plan
7/19/2016	CF	Email to T. Van Norman forwarding Mana Pools MIKES site information
9/19/2016	CF	Email to T. Van Norman forwarding article about CAMPFIRE review
9/2016	AfESG	AfESG African Elephant Status Report 2016
11/9/2016	ZPWMA	Email to T. Van Norman attaching requested Plan prioritization and Supplemental Plan
11/14/2016	CF	Email to T. Van Norman forwarding article describing anti-poaching efforts by the Tashinga Initiative in the Zambezi Valley
12/27/2016	CF	Email to T. Van Norman forwarding presentation by ZPWMA Elephant Coordinator
1/18/2017	CF	Email to T. Van Norman forwarding DAPU End-of-Year Report
2/1/2017	CF	Email forwarding anti-poaching report reflecting implementation of the Mana Pools/Zambezi Valley regional elephant management plan
3/6/2017	CF	Email forwarding status of Zimbabwe responses to FWS requests
4/6/2017	CF	CAMPFIRE Association, The Role of Trophy Hunting of Elephant in Support of the Zimbabwe CAMPFIRE Program
4/6/2017	CF	CITES/MIKE, Levels and Trends of Illegal Killing of Elephants in Africa to 31 December 2016

Note: This list is not and is not intended to be a complete record of the FWS' Zimbabwe elephant file. The FWS undoubtedly received information not listed here, including at least two information productions by Safari Club International. We believe that the FWS has received direct communications from applicants for import permits, safari hunting operators, ZPWMA, and others.

LUSULU CAMPFIRE HUNTING CONCESSION , BINGA RDC
AND
TSHOLOTSHO SOUTH CAMPFIRE HUNTING CONCESSION, THSOLOTSHO RDC

SOCIAL RESPONSILITIES CARRIED OUT WITH IN THE TSHOLOTSHO SOUTH CAMPFIRE AREA

2013 / 2014

HEALTH CLINICS, RURAL DISTRICT COUNCIL, GOVERMENT DEPARTMENTS

GOVERNMENT DEPARTMENTS

C1A

ZIMBABWE REPUBLIC POLICE

Official Communications should not be addressed to individuals

Z R P TSHOLOTSHO
P O BOX 70
TSHOLOTSHO

0387-267

16 May 2013

LODZI HUNTERS
Tsholotsho

Sir

REF: **BREAKDOWN OF WHAT IS REQUIRED TO RESUSCITATE THE PUMPING OF RAW SEWAGE FROM ZRPOLICE TSHOLOTSHO CAMP.**

1.0. The following are the requirements that can resuscitate the sewerage system at the station.

- 20 horse power pump and starter
- 150 mm single fienched suction hose
- Water conservation tank
- 16sq mm aluminium stranded cable
- 3x5m wooden poles
- 6 shackle insulators
- 6 D iron
- 6x16mm bolts
- 4 PG clamps
- 3 core armoured cables[10sqmm]

2.0. Respectfully referred,

INSP CHIRAPE.M
Officer-in-Charge
TSHOLOTSHO

Helped $1,500

ZIMBABWE REPUBLIC POLICE

ZRP TSHOLOTSHO
P.O.BOX 70

15/07/13

The OPERATIONS MANAGER
LODZI HUNTERS
Sir,

RE:REQUEST FOR ZRP TSHOLOTSHO SEWER SYSTEM

1. Subject matter is relevant

2. The items listed below are outstanding to complete re-installation of electric motor and sewer system.

- Three gate valves (25mm)
- Ball float and a valve system 25mm
- Socket union 110mm
- 1000litre tank
- 5metres Cable SWA 4 core 2.5mm BC

3. Your usual co-operation is appreciated.

4. Best Regards

.....Amar.....C/Insp Muzzah
O.I.C ZRP Tsholotsho

Shaft of electric motor 28mm and pin groove 8mm.

Done 18 3

RESPONDED.

ZIMBABWE REPUBLIC POLICE

Official Communications should not be addressed to individuals

Lupane District Headquarters
P.O.Box 701
Bulawayo

Telegram: OC Lupane District 09-75135

4th November 2013

.....

.....

.....

.....

RE: REQUEST FOR DONATION

Zimbabwe Republic Police, Lupane District will be holding N.W.C Awards, Service Charter Re-launch and Campaign against Poaching on the 23rd of November 2013. Venue will be Tsholotsho Business Centre.

Those who will be attending the launch need to be fed while witnessing the Award giving ceremony, the Re-launch ceremony as well as the sharing and mapping out strategies of curbing crimes of Poaching in the District and in the Province at large. It is against this background and in the spirit of oneness in the District that we are kindly requesting for donations in the form of cash or kind.

It is our conviction that you will support us in this noble course.

Thank you.

[MKANDLA. F]Superintendent
For Officer Commanding Police
LUPANE DISTRICT
/ns

701 # 500

EMA.
We have been pleased with the service that was provided to us during the period of our stay.
27/10/2013

3

E.M.A. ENVIRONMENT MANAGEMENT AUTHORITY

RE: TRIP TO NEUTRALIZE CYANIDE POISION IN HWANGE NAT PARK

THYS DE VRIES

① SAMAHURU ADVENTIST HIGH SCHOOL

PUMULA AGRITEX OFFICE

P O BOX 72

TSHOLOTSHO

29 March 2014

The Manager

Lodzi Safari Lodge

Tsholotsho

Dear Sir/Madam

REF : APPLICATION FOR A SCHOLARSHIP TO STUDY A DEGREE PROGRAMME

I hereby apply ford scholarship to study a degree programme at Lupane State University . I am a Lady aged 36,working as an Agricultural extension worker based at Pumula area , ward 7 Tsholotsho.

Currently , I am holding a Diploma in Agriculture and I wish to pursue my studies but I am not financially stable to progress.

Your assistance in this issue will be greatly appreciated.

Yours faithfully,

_____

Nkomo Melody

NO PHOTOCOPY TO BE ACCEPTED

SERIAL NUMBER: JN-MN17/14

Official Communication should not be addressed to individuals

CID Mat North District
Headquarters
P. Bag 1
HWANGE

Tel: (0281) 30573

Fax: (0281) 34343

Ref: 511/9/3/14

31 March 2014

LOBZI HUNTERS
.....
.....
.....

Sir/Madam

RE: - REQUEST FOR FINANCIAL ASSISTANCE: CID MAT NORTH

1. This office is requesting for assistance in the form of cash to fund the CID 2014 sports gala.
2. It is because of our good relations that we have chosen to seek assistance from a reputable firm like yours.
3. We cherish your good gesture in advance and anticipate your usual cooperation in this regard.

DISTRICT CRIMINAL INVESTIGATION OFFICER MAT NORTH PROVINCE
2014 -04- 01
P BAG 5934 HWANGE ZIMBABWE TEL 081-30573

NYAPFURI J Chief Superintendent
District Criminal Investigation Officer
MATABELELAND NORTH

+/- $200

not done

Department of Agricultural Technical & Extension Services

agritex MINISTRY OF AGRICULTURE

All communication to be addressed to "The PAEO Mat. North"
5th floor Mhlahlandlela Govt. Complex, 10th Ave/Basch Street:
PO BOX 1927 BULAWAYO. Telephone 67161-4, Fax 67136.

12 June 2014

Lodzi Safari Lodge
Tsholotsho

DEPT. OF AGRITEX
DISTRICT AGRICULTURAL
EXTENSION OFFICER
MATABELELAND NORTH
P.O. Box 22, Tsholotsho

INVITATION TO AN AGRICULTURAL SHOW

As farmers of Tsholotsho District we would like to show case our 2013-14 field produce on the 27th June 2014. The venue will be Mgomeni Primary school, at 10 o'clock in the morning.

You are cordially invited to this big event.

Your presence will be greatly appreciated.

Yours faithfully,

P.P M. Nkomo

Manandy Dube
(Ward Show Secretary)

NB Ward 7

Pumula Agritex offices DONE.
P o Box 72
Tsholotsho

26-06-2014

The Manager
Lodzi Hunteres
Tsholotsho

Dear sir / Madam

Ref: Request for a transport to carry our Agricultural produce to our District show

As farmers of ward 7 at Tsholotsho District we are requesting for a transport to ferry our agricultural produce to Tsholotsho District Agricultural showwhich will be held on the 6th of August 2014.

Your assistance will be highly appreciated.

Yours faithfully

Nkomo M. (Agricultural Extension officer)
Ward 7.

TSHOLOTSHO RURAL DISTRICT COUNCIL

COUNCIL

TSHOLOTSHO RURAL DISTRICT COUNCIL

Telephone 038[illegible] 279/324/325/235/310/Fax: 038[illegible]-325
Email: trdceeo@yahoo.com/trdc@comone.co.zw Box 40, Tsholotsho

22nd April 2013

Lodzi Hunters

REF: CAMPFIRE COMMITTEES TRAINING WORKSHOP FOR NEW COMMITTEES

You are cordially invited to attend the above workshop:

Date: 8th – 9th of May 2013
Time: 0800hours
Venue: Tsholotsho BSPZ Resource Centre

Furthermore, we request donations in Cash towards making this training a success. We will be training committees from Tsholotsho South and Tsholotsho North. We will be glad if you (as our Safari operators) can each cover half of costs of the Workshop.

Find attached is our draft budget for the training. Looking forward to your usual cooperation.

Thank you.

.....
S. Sibanda (for C.E.O)

udget for Training of CAMPFIRE Committees

Item	# of people	Unit type	Units	Unit Cost	Total Cost
A4 Exercise books	50	-	50	0.20	10.00
Blue pens	50	-	50	0.20	10.00
Flip Charts	0	-	5	3.00	15.00
Mighty Markers	0	-	1	5.00	5.00
Breafast / Teas	50	days	2	2.00	200.00
Lunch	50	days	2	3.50	350.00
Dinner	50	days	2	3.50	350.00
Accomodation	50	days	2	12.00	1200.00
Transport	50	people	1	10.00	500.00
Out of pocket	45	people	2	5.00	450.00
Conference hire	0	days	2	60.00	120.00
Totals					**3210.00**

Surplus

TSHOLOTSHO RURAL DISTRICT COUNCIL

Telephone 0387 279/324/325/235/310/Fax: 0387-325

Email: trdcceo@yahoo.com/trdc@comone.co.zw Box 40

07 JULY 2014

LODZI HUNTERS

SUBJECT: TOUR OF TSHOLOTSHO RURAL DISTRICT COUNCIL CAMPFIRE PROJECTS BY THE HONOURABLE MINISTER OF STATE FOR PRONVINCIAL AFFAIRS IN MATABELELAND NORTH

Reference the above.

This note serves to advise your office that the Honourable Minister of State for Provincial Affairs in Matabeleland North Cde C. G. Mathema will be touring areas in your concession area and in particular Ndabambi Camp on the 16th of July 2014. We request that you avail staff to be in attendance on this prestigious event.

We have attached a tentative program for your attention.

Thanking you for your unwavering commitment to the development of the district.

Yours faithfully

T. Moyo

Chief Executive Officer.

TSHOLOTSHO RURAL DISTRICT COUNCIL

Telephone 0387 279/324/325/235/310/Fax: 0387-325

Email: trdcceo@yahoo.com/trdc@comone.co.zw Box 40

TENTATIVE PROGRAMME FOR THE TOUR OF TSHOLOTSHO RDC CAMPFIRE PROJECTS BY THE HON MINISTER OF STATE FOR PRONVINCIAL AFFAIRS IN MATABELELAND NORTH CDE C.G MATHEMA

DAY 1-15 /07 /2014

1.COUNCIL PROJECTS

- Construction of Nkwizhu Primary School- Ward 6
- Construction of Mahlaba Primary School teacher's cottage- Ward 6
- Gwaai Primary School and Mcetshwa Primary School classroom blocks completed- Ward5
- Dibutibu Primary School block construction at roof level- Ward 4
- 75-3 seater combied desks Kapani Secondary purchased- Ward 3
- Brick moulding at Ntulula Line- Ward 3 for Phakama Primary School construction- Ward 3
- Jowa Clinic construction- Ward9
- Gombalume Primary -Solar Pumping system- Ward 2
- Ngamo piped water system- Ward 3
- Ziga Primary Schoo-lWard 3
- Ngamo Secondary-Ward 3
- Mtshwayeli Camp Ward 3
- Malindi Primary School construction- Ward 9

DAY 2-16 /07/20 14

- Official handover of school furniture- Council
- Fencing of Madlangombe clinic- Ward 10
- borehole drilled- Ward 10
- Tshitatshawa Clinic-Ward 8
- Piped water system -Ward 7
- Ndabambi Camp- Ward 1
- Benches and desks at Pelela-Ward 7
- Mono pumps- Ward 1

END OF PROGRAMME

TSHOLOTSHO RURAL DISTRICT COUNCIL
Box 40 Tsholotsho
Telephone 0387 279/324/325/235/310/449/Fax: 0387-325
Email: trdcceo@yahoo.com/trdc@comone.co.zw

RE: BILLS OF QUANTITIES FOR EQUIPMENT REQUIREMENTS FOR CHEFUNYE CLINIC

ITEM	DESCRIPTION OF ITEM	QUANTITY
1	Ward Beds	4 ✓
2	Bed sides Lockers	4 ✓
3	Drip Stands	4 ✓
4	Coach Examination	2 ✓
5	Dressing Trolleys	3 ✓
6	Wheel Chair	1 ✓
7	Delivery Bed	1 ✓
8	Bowl Stands	3
9	Drug Trolley	1 ✓
10	Wire Baskets	4 ✓
11	Metal Bin	5 ✓
12	Foot Rest	1 ✓
13	Auto Claving Pot (1 big one – electric)	1 ✓
14	Suction Machine Manual	1 ✓
15	Letter Tra...	2
16	Puncher	2
17	Scales - Baby Bean Type	2 ✓
18	Scales – Spring Type	2 ✓
19	Bathroom Scales 130kgs	2 ✓

20	Sphygmomanometer	2 ✓
21	Stethoscope	3 ✓
22	Ambu bags Peads	1 ✓
23	Ambu bags Adults	1 ✓
24	Feoto Scope	2 ✓
25	Urinal male	4 ✓
26	Bed pan	4 ✓
27	Bowl wash metal	2 ✓
28	Screen bed side rails	2 ✓
29	Scissors surgical	5 ✓
30	Scissors dressing heavy 200m	2
31	Forceps artery (small)	15 ✓
32	Forceps dissecting plain separated (big)	15 ✓
33	Forceps artery kotcher straight	15 ✓
34	Forceps dissecting toothed 16cm	15 ✓
35	Forceps sponge holding	5 ✓
36	Dissecting Forceps Small	15 ✓
37	Episiotomy scissors	5 ✓
38	Speculum Vaginal	5 ✓
39	Needle Holders	5 ✓
40	Bowl lohon metal size 150mm	10 ✓
41	Bowl lohon plastic size 150mm	10 ✓
42	Bowl lohon plastic size 250mm	10 ✓
43	Measure Hire Gradated 50ml	2 ✓
44	Medicine Measure plastic 50ml	20 ✓
45	Gas EPI Fridge – double door	1 ✓
46	Gas Flawmeter	2 ✓
47	Delivery Kits	5 ✓
48	Oxygen Gas Trolley	1 ✓

	Galipot Type 10cm	10 ✓
50	Bowl lohon metal size 16cm	5 ✓
51	Kidney Dishes (30cm)	10 ✓

Thank you.

L Banda

For CHIEF EXECUTIVE OFFICER

HEALTH CLINICS

PUMULA MISSION HOSPITAL

BOX 711

BULAWAYO

THE BUSINESS COMMUNITY

REF:REQUEST FOR FUNDS FOR OFFICIAL OPENING OF MDR WARD

DEAR SIR/MADAM

Our hospital will be holding a function of official opening of Multi Drug Resistance ward which was built by MSF .the ward is supposed to be handed over to the community officially.

We therefore request you to assist us with funds for this big day.

We hope our request will be considered.

Thank you for your co-operation .

K.SIBINDI.

[Secretary for hospital development committee].

18/03/13

Lodzi Hunters
Box 40
Binga

29 November 2012

Attention P. Nemashakwe

Ref: Request for water engine to be serviced.

We kindly ask you to assist us in servicing the water Engine for Mlagisa Rural Health Centre, as the facility is facing a challenge of water.

M. Makhabiswana
For: District Medical Officer

C.C SIC Mlagisa RHC

TSHOLOTSHO DISTRICT HOSPITAL
DISTRICT MEDICAL OFFICER
29 NOV 2012
P.O. BOX 100, TSHOLOTSHO
ZIMBABWE TEL: 0387/216/292

TSHOLOTSHO RDC
BOX 40
TSHOLOTSHO
09 AUGUST 2013

DEAR SIR / MADAM

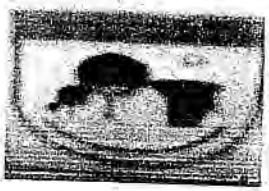
THIS LETTER SERVES TO INFORM LOBZI HUNTERS / DIRECTORS, THAT 'I' J.APHET NGWENYA GAME SCOUT RECEIVED FOOD DONATION FROM YOUR COMPANY DURING MY DENTAL TREATMENT ON THE MONTH OF JUNE, WHICH INCLUDE PACKAGES OF ~~GENITA~~ CEREVITA AND SOME SOUPS

THEREFORE I WOULD LIKE TO THANK YOUR COMPANY DIRECTORS FOR THE ASSISTANCE DURING MY TIME OF NEED

WHISHING YOU MORE BLESSINGS

YOURS J.APHET NGWENYA (GAME SCOUT)

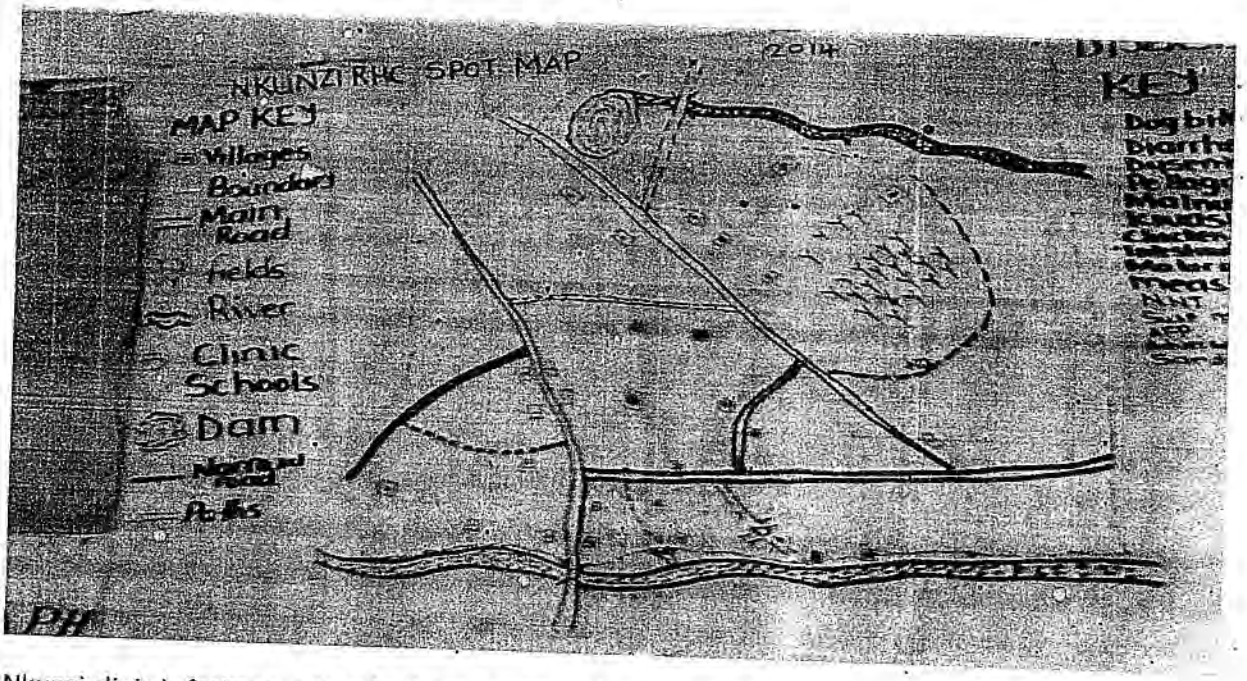
TSHOLOTSHO RURAL DISTRICT COUNCIL
NKUNZI RURAL HEALTH CENTRE
P. O. BOX 40
TSHOLOTSHO



REQUEST FOR ASSISTANCE THROUGH DONATIONS IN CASH OR KIND

Nkunzi clinic has a catchment population of 18 074 catering for 3 wards in Tsholotsho and neighbouring Plumtree district in Matabeleland South Province along Manzamnyama River and Somnene area. Ward 18 with 6 villages, 19 with 7 villages and 20 with 11 resettlement areas.

This clinic has only 2 almost full Blair toilets which are also badly cited, catering for over 150 clients, staff and their dependants per day. Nkunzi RHC was one of the first ART initiation clinics and so has a large number of clients to cater for on daily basis. It has been out of running water for the past 3 years hence use of Blair toilets an alternate.

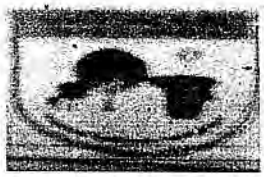


Nkunzi clinic is facing sanitary facilities shortages hence there is need for new Blair Ventilated Improved Pits (BVIPs) Latrines. The fence is also dilapidating, the clinic has no security at all and has become grazing land for cattle, donkeys and goats, and there is also need to replace with new 1.8m tall fence and a sliding gate including a small closable gate. This health facility also has waiting mothers' shelter and mothers are afraid especially at night if she is alone as there is no security at all.

What is needed?

1. 120 bags of cement.
2. 185m + 160m x 2 = 690m x 1.8m height.
3. Steel poles at least 1.8 m height to support the fence.
4. Plain wire 690m x 4.
5. Sliding gate (metal) 4m long x 2m height.
6. Small gate.

TSHOLOTSHO RURAL DISTRICT COUNCIL
NKUNZI RURAL HEALTH CENTRE
P. O. BOX 40
TSHOLOTSHO



What has been done.

Every household was requested to contribute R5.00 towards construction of 8 BVIPs which will take ages to sum up the total needed. Also in need is a concrete slab from the gate to accommodate those on wheel chair or stretcher bed i.e. patients on scotch carts. Cement brick moulding will be done for the toilets at the clinic.

We are therefore appealing for donations towards the development of this clinic as it is totally dilapidating and the next generation will find it in shambles if we fail to maintain it continuously.

Donations can be in:

1. Cash
2. Cement
3. Steel poles 1.8m height
4. Plain wire
5. Fence 1.8m height
6. Gates

We are hoping for maximum cooperation towards the development of this clinic as it will also improve on health delivery.

ZIMBABWE

MINISTRY OF HEALTH AND CHILDCARE

FUNDING PROPOSAL

BACKGROUND INFORMATION

Tsholotsho is a rural District in Matabeleland North Province (North-West Zimbabwe) with a population of 118132. The district is divided over three main ethnic groups namely the Ndebele, Kalanga and San. It is located 120km north-west of the Metropolitan city of Bulawayo. It is a drought prone farming and cattle rearing area with little employment opportunities hence many able bodied men and women go to South Africa in search of jobs. It lies in region 4 and 5 hence the population is prone to malnutrition. The roads are dusty in most parts of the district and sandy as well which makes them difficult to use during the rainy season.

The District Hospital was established in 1951 as a rural hospital and upgraded to a district hospital in 1991 under the Family Health Project, Phase 1. Currently it has 20 health facilities, 2 of them in the urban setup whereas the rest are in the rural areas. It has in-patient wards with 140 bed capacity, a rehabilitation department, an X-ray department, pharmacy, large and small theatre, dispensary, mortuary, laboratory, maternity wing and administration block.

INTRODUCTION

Zimbabwe experienced a deteriorating economic and social environment since 2000 which resulted in crises in the health delivery system with bottlenecks such as erratic power supply, obsolete machinery and dilapidated infrastructure. Tsholotsho District Hospital was and still remains one of the affected hospitals. However, in 2013 Government launched the Agenda for Sustainable Socio-Economic Transformation (Zim Asset): October 2013 - December 2018. Zim Asset was crafted to achieve sustainable development and social equity anchored on indigenization, empowerment and employment creation which will be largely propelled by the judicious exploitation of the country's abundant human and natural resources.

The Ministry of Health and Child Care (MOHCC) has Key Result Areas (KRAs) in all four clusters of the Zim Asset and in order to realise tangible results, current challenges faced by the hospital need to be addressed as a matter of urgency. The most pressing problems include; falling ceilings which have lasted longer than the 10 years life span and which must therefore be completely replaced, a blocked sewer system, termite infestation, dilapidated equipment and infrastructure and a School of Nursing building project which has been on a stand still since 2013. (See attached a complete list of the materials and equipment required to rehabilitate the hospital to serve its communities efficiently and effectively)

STATEMENT OF THE PROBLEM

With reference to the challenges mentioned above, the hospital is adversely affected by shortage of funds to procure essential equipment, rehabilitate dilapidated infrastructure and finance the building of the Tsholotsho School of Nursing.

OBJECTIVES

- To source for funding and /or donations to address any/all of the challenges faced by the District Hospital
- To source for funding to complete the building of the School of Nursing PSIP project

BUDGET FOR CEILLING

DEPARTMENT	ESTIMATED COST $
Maternity	5 000
CSSD	10 000
Female Ward	5 000
Male Ward	5 000
Peads	5 000
Admin	5 000

DETAILS OF CONTACT PERSON/ PERSON SENDING PROPOSAL

Dr. N. Sithole Cell Number 0772630033

Acting District Medical Officer

Email address:. tshohospital@gmail.com

Mr. M. Mathabiswana Cell Number 0774013636

Acting District Health Services Administrator

Email address: tshohospital@gmail.com

Pumula Mission Hospital

/

SR. IN-CHARGE
PUMULA MISSION HOSPITAL
P. BAG 5907B
BULAWAYO

Pumula Mission Hosp'
Box 711
Bulawayo.

19 march 2014

The manager
Kodak Hunters.

- Request for Ambulance maintainance; Service and repairs

Pumula Mission Hospital a Population about 10000 people and provides transport for Patients/clients outreach services, referals and service Vehicle for hospital provisions. It is the only Source of transport at the institute. Due to financial constraints we are unable to maintain, Services and repair it, at the moment we have the following items which we need for it to function at its maximum

1) 5 tyres Size 14 x 195.
2) 10 litres Engine oil 9TX (Diesel).
3) 4 litres brake fluid

Repairs

Window Glasses.
Heater.
Back door.
Indicators and Handbrake. If the above are done the vehicle will function for at least a year with

minor services needed.

Your assistance in the above will go a long way in Community support and assistance in terms of transport.

Thankyou for your usual Cooperation in advance

Yours

- CATHRINE NGWARE.

Ngware Sic (0775707786 | 0713341885).

You can Contact the Administriter MR A Mayo 0775199517

Pumula Mission
P Bag 711
Bulawayo

10 Nov 2014

MR TAIS
LODZI HUNTERS

REF : INVITATION AS A GUEST OF HONOUR TO OUR CHRISTMAS PARTY

We are requesting you to be our guest of honour for our staff christmas Party which will be held on the 13th of December 2014 at Pumula mission Hospital, time 1700hrs

Thank you for your co-operation

Sibanda - workers committee secretary

TSHOLOTSHO DISTRCT ADMINISTRATION OFFICE

OFFICE OF THE DISTRICT ADMINISTRATOR

P O BOX 77

TSHOLOTSHO

23 January 2014

Done

The Manager

Lodzi Hunters

BULAWAYO

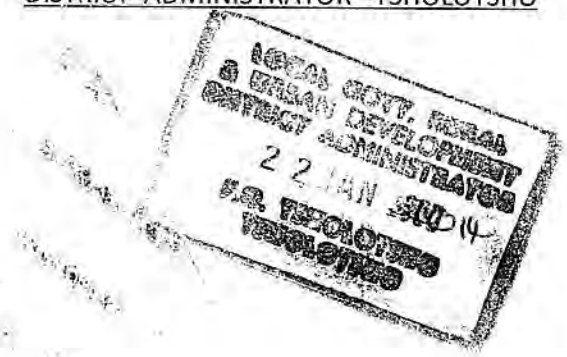
RE ; LETTER TO ACKNOWLEDGE THE DISTRICT ADMINISTRATORS VEHICLE REPAIRED

The office of the District Administrator would like to take this opportunity to acknowledge and appreciate the vehicle which was repaired by your organisation. It was difficult for the District Administrator to make a follow up for the projects in district and to attend meetings outside the district as we had to rely from other departments. We really appreciate your efforts to enable the ease . movements of the District Administrator.

THANK YOU

N DUBE

DISTRICT ADMINISTRATOR -TSHOLOTSHO



Office of the District Administrator

P O Box 77

Tsholotsho

07 March 2014

Lodz Hunters ATT: ATT MR Gumbo

.....

.....

Ref: REQUEST FOR DONATIONS 2014 INDEPENDENCE DAY TSHOLOTSHO

Tsholotsho District will be celebrating the 34th Zimbabwe Independence Day. The District is therefore requesting your organization to assist with donations towards this special event. We also thank you for your usual support.

The District Administrator, staff and the committee hereby extend their heartfelt invitation to you to grace our afore mentioned occasion.

Your unequivocal support in this regard will be highly appreciated.

N. Dube

N. Dube

DISTRICT ADMINISTRATOR- TSHOLOTSHO

16 March 2014

Office of the DISTRICT ADMINISTRATOR
P O Box 77
Tsholotsho

11 April 2014

To LODZE HUNTERS
Bulawayo

Re - Acknowledgement of Independence Donations 2014

The office of the DA would like to acknowledge the following

3 crates drinks
50 kg meal meale
44 pints beer
mineral water 36
48 cans Zero
4 empties beer
~~10 x 5 meale meal~~

We appreciate the donation

11 April 2014

S. Phiri
for: DA - Tsholotsho

OFFICE OF THE DISTRICT ADMINISTRATOR
P O BOX
TSHOLOTSHO

16 APRIL 2013

TO THE DIRECTOR
LODZI HUNTERS

ACKNOWLEDGEMENT LETTER AND APPREACIATION

The Office of the District Administrator would like to acknowledge and appreciate the donation of 200 litres diesel. $300 for ox and 250 kn mealie meal.

Thank you

N DUBE
DISTRICT ADMINISTRATOR - TSHOLOTSHO

OFFICE OF THE DISTRICT ADMINISTRATOR
P O BOX
TSHOLOTSHO

16 APRIL 2013

TO THE DIRECTOR
LODZI HUNTERS

ACKNOWLEDGEMENT LETTER AND APPREACIATION

The Office of the District Administrator would like to acknowledge and appreciate the donation of 200 litres diesel. $300 for ox and 250 kn mealie meal.

Thank you

N DUBE
DISTRICT ADMINISTRATOR - TSHOLOTSHO

P.O. Box 77

Tsholotsho

Zimbabwe
Telephone: (0387) 202/585

ZIMBABWE

District Administrator
Local Govt Rural and Urban Dev
Tsholotsho

04 July 2014

Done

LODZI HUNTERS

REF: REQUEST FOR TRANSPORT AND REFRESHMENTS AND INVITATION TO PICNIC RDDC MEETING

The above matter refers;

Tsholotsho District is planning to hold picnic RDDC meeting at Garia Dam on 21-07-2014. The meeting is aiming at discussing half year achievements and outstanding in our 2014 plans and to enable stakeholders to interact and discuss on neutral venue that will make us know each other well. We therefore request your organisation to assist with vehicle and refreshments for the day and to prepare its detailed report and send a representative.

Your usual support and co-operation will be greatly appreciated.

Yours faithfully

N. Dube

District Administrator- Tsholotsho

Office of the District Administrator

P O Box 77

TSHOLOTSHO

DONE

11 November 2014

Lizzi Howells

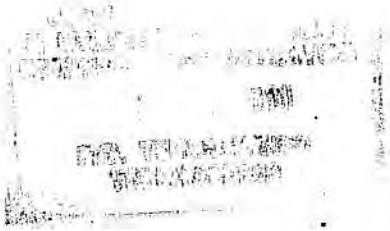
.....

Re : INVITATION TO A SWITCH CEREMONY : TSHITATSHAWA SEC SCHOOL 20TH NOVEMBER 2014 TSHOLOTSHO DISTRICT

The office of the District Administrator is inviting you to the switch on ceremony to be held in Tsholotsho district on the 20th of this month . All the seven districts in Matabeleland will be attending the function . We therefore, request for donations to make this day a success. Below is a list of items required.

Thank you for your usual support.

T Dube

DISTRICT ADMINISTRATOR - TSHOLOTSHO

1. 3 X 50KG MEALIE MEAL 1
2. 5 CARTOON MAZOE ASSORTED 2
3. 2 X 50 KG RICE 20 Kg
4. 2 X 10 LITRES COOKING OIL 5 L
5. 20 CABBAGES 2
6. 5 BAGS POTATOES AND TOMATOES-ONIONS
7. 10 CRATES MINERAL WATER 5
8. 20 BOTTLES SALAD CREAM 5
9. A DOZEN OF BREAD
10. 2 BOXES MILK AND I BOX TEA BAGS
11. 10 CRATES CANS ASSORTED DRINKS 5
12. 10 CRATES JUICE ASSORTED 5

Done

POLITICAL PARTIES

DONE

Zimbabwe African National Union Patriotic Front ZANU PF

UNITY, PEACE AND DEVELOPMENT

51418

5th May 2014

LOBZI HUNTERS

TRDC
ADMINISTRATION

Matabeleland North
Provincial Headquarters
P/Bag 5883
LUPANE
Tel No. 089-8-241/242

REF: APPEAL FOR DONATIONS FOR THE 21ST FEBRUARY MOVEMENT CELEBRATIONS

The above office is requesting for a donation either in cash or kind for the preparations of the 21st February movement which will assist the event to be a success. The event will be held in Tsholotsho on the 24th of May 2014.

Looking forward to a favourable response from you.

Account name .ZANU PF YOUTH LEAGUE MAT NORTH PROVINCE

ACCOUNT NUMBER (b) (4) [redacted]

BANK - AGRIBANK

LUPANE BRANCH

Thank you in advance for supporting this noble cause

Please find attached our working budget.

Yours sincerely

Cde E. Sibanda
Chairman - Fundraising committe

Cell 0772457565

PAMBERI NE-ZANU PF
PHAMBILI LE ZANU PF
KUNEMBO A ZANU PF

FUNDRAISING COMMITTEE: Cde Elias Sibanda (chairman). Cde Daniel Sithole. Cde Shingirai Mupazviripo

ZANU P.F. MATABELELAND NORTH PROVINCE

Proposed budget for the 21 st February Movement Celebrations 2014

Quantity	Description	Unit price	Total price
2	Beasts	$ 500.0	$1 000
200 litres	Diesel	$ 1.50/litre	$ 300
200 litres	Petrol	4 1.60/litre	$320
4 x 50 kg	Mealie meal	$28	$112
1	Cake	$100	$100
3x20 kg	Rice	$18	$54
20	Soft drinks	$12/crate	$240
6 x 2 litres	Mazoe	$3	$18
1 box	Tomatoes	$20	$20
1 pocket	Onions	$12	$12
10	Cabbages	$1	$10
2 x 3 kg	Salad cream	$9.50	$20
3 x litres	Tomato sauce	$ 3.50	$10.50
12 x 2 litres	Cooking oil	$ 4	$48
30	Chickens	$7	$210
5 cases	Mineral water.	$12	$60
3 x 2 kg	Sugar	$2	$6
2 x 2 kg	Salt	$1.50	$3
2 dozen	Bread	$12	$24.
2 litres	Sunlight liquid	$5	$5
20 crates	Opaque beer	$6	$120
10 cases	Beer canes	$19.02	$109.02
	P.A. SYSTEM		$150
	ACCOMODATION		$300
	INCIDENTAL EXPENSES	$600	$600
	Total cost		$3 851.52

04: Library Construction from window level to completion. The library is equivalent to standard classroom.

05: Replacement of worn out metal doors with locks. Three doors and locks are needed to secure school property.

06: Replacement of glass panes with equivalent putty for glazing. The quantity and measurement are as follows:-

QUANTITY	MEASUREMENT OF GLASS PANES
71	460 x 290mm
9	440 x 290mm
30	440 x 280mm
48	430 x 280mm
17	430 x 270mm
3	430 x 290mm
10	430 x 275mm
TOTAL 191	

07: Textbooks and pupils' exercise books are vulnerable to wear and tear due to insecure storage. We are appealing for steel cabinet for ECD "A" to Grade 7 class

(b) One for the head, one for the Deputy Head, one for the TIC Infants and one for the TIC Junior classes.

08: There is a critical shortage of school furniture for both pupils and teachers

SCHOOL ENROLMENT

JUNIOR CLASSES	INFANT CLASSES	TOTAL
138	127	265

(b) Nine teachers' tables with drawers and chairs

(c) Head teachers' table with a chair

(d) Deputy head's table with a chair

(e) TIC Infants' table with a chair

(f) TIC Juniors' table with a chair

09: Stationery for pupils and teachers

10: Library books that cover ECD "A" and "B" to Grade 7 level of education.

11: Teaching and learning aids various subjects like Mathematics, English, Environmental Science, Home Economics, Social Studies, Religious and Moral education, Agriculture, Music, Physical Education, Art and AIDS Education.

12: Sportswear and equipment in athletics, soccer, netball, volleyball and basket ball.

13: The water table for the borehole is 84 metres deep, hence difficult to pump water. We regret for water pump engine with pipes to draw water from taps. Three big jojo tanks will do, to suffice pupils, teachers and water the garden and the orchard. The school offers Agriculture as a practical subject.

14: Garden tools, seeds, pesticides and fertilizers.

15: We would like to increase our orchard trees like oranges, naargites, apples, ovacodes etc.

16: Fencing material for the entire school, that is 400m x 300m with two main gates.

17: To be in line with the global requirement, request for computers with solar panels for educational purposes.

18: The ECD "A" and "B" classes have no classrooms, furniture and play material in doors and

outside, hence we request for the above stated items.

19: the kitchen for pupils is not durable, hence needs to be maintained from time to time as it is made of mud. We request for the building material to construct a permanent structure.

20: Teachers are overcrowded in two teachers' cottages, hence no privacy. We request for an F14 teachers' house to alleviate teacher accommodation problem.

21: We have some iron frames for stools, chairs, tables and desk that need to be repaired by welding and tops to be fitted. The quantity and measurement is as follows:-

QUANTITY	**ITEM**	**MEASUREMENT**
90	Stools	270mm X 270mm
20	Desks	1000mm x 1800mm
5	Teachers' tables	1200mm x 750mm
30	Chairs	Bottom and back sets

Your usual support in donating something highlighted above will alleviate our problems.

Yours faithfully

.....

Ndlovu Mica
(Headmaster)

TEMBBILE PRIMARYSCHOOL

TEMBILE PRIMARY SCHOOL
P.O.BOX 184
TSHOLOTSHO.

DONE.

11 JUNE 2014

THE MANAGER
LOKOS HUNTERS SAFARI

RE: Acknowledgement of receipt of river sand

Tembile primary school acknowledges the receipt of 3 loads of river sand. On behalf of the school we would like to express our gratitude. Hope we will continue working together towards the development of our community.

Greatfully appreciate your assistance

Yours faithfully

N Mkandla (T.I.C)

T.I.C

11-06-14

Done 12/06/14

Tembile Primary School.
P.O Box 184
Tshelotsho.

DONE

11 June 2014

The Manager.
Lodzi Hunters Safaris

Dear Sir / Madam

R.E: Request for assistance in transportation of our 3000 litres bouzer for refilling and returning.

We wish to request for your assistance with the means of transport for transportation of our 3000 litres bouzer. We wish to have the bouzer re-filled. The bouzer is stationed at Tembile Primary School. A tractor would be of great help. The bouzer has its own wheels and it is easily moved. The teachers and pupils are now facing a health hazard as drinking from unprotected dams is unsafe.

We hope to get feed back from your office.

Yours Sincerely

Gwangwaya R.T. Acting Headmaster
Cell: 0773495405.
0716525059.

HEAD
SCHOOL
TSHOLOTSHO
11/06/14

TEMBILE PRIMARY SCHOOL

P.O BOX 184

TSHOLOTSHO

12 NOVEMBER 2014

THE MANAGER

LODZI HUNTERS

TSHOLOTSHO

Dear Sir/Madam

RE: Request for game meat, 1000 litres of water and a tent to pitch on our annual speech and prize giving ceremony to be held on the 21st of November.

The staff, pupils and the SDC of Tembile Primary school requests the manager of Lodzi Hunters to assist by offering game meat and 1000 litres of water for consumption during the ceremony and a tent to provide shade during the ceremony on the 21st of November 2014.

We hope and trust that our request will be considered.

Yours Sincerely

Gwangwaya R.T (Acting Head)

Tembile Primary School
P O Box 154
Tshiletshe

12 June 2014

The Manager
Lake Hunters Safaris

Dear Sir / Madam

Re: Acknowledge of receipt of 1000 litres (water)

Tembile primary school acknowledges the receipt of 1000 litres of water. On behalf of the school we would like to express our gratitude.

Yours faithfully

N Mkandla (T I C)

✓

Done 14/06/14.

Tembile Primary School

P.O Box 184

Tsholotsho

1 October 2014

The Manager

Lodzi Hunters

Dear Sir/Madam

Re: **Request for assistance of 55 prizes and gifts for 55 pupils to be awarded accolades during our annual speech and prize giving day to be held on the 21st of November 2014.**

Tembile primary school is asking for your assistance in the form of 55 gifts and prizes to be awarded to 55 pupils set to receive accolades during our annual speech and prize giving day to be held on the 21st of November 2014.

We hope and trust that our request will be considered.

Yours sincerely

Gwangwaya R.T (Acting Head)

THE P.A
TEMBILE PRIMARY SCHOOL
P.O. BOX 184, TSHOLOTSHO
DATE:
SIGN:

Tembile Primary School

P.O Box 184

Tsholotsho

1 October 2014

The Manager

Lodzi Hunters

Dear Sir/Madam

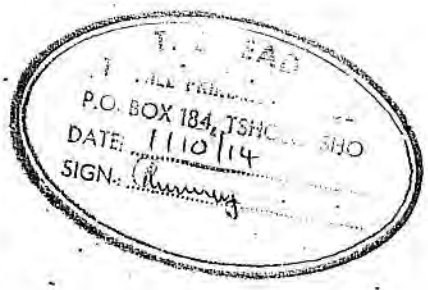
Re: **Request for transport to ferry a 3000 litre water Bouzer from Tembile primary school for refilling and returning back.**

Tembile primary school is asking for your assistance in the form of transport to ferry a 3000 litre water bouzer from Tembile primary school for refilling and then returned back to school. The school development committee is facing challenges with water situation as the available water source is not good for the consumption of the pupils and the teachers.

We hope and trust that our request will be considered.

Yours sincerely

Gwangwaya R.T (Acting Head)



Tembile Primary School
P.O Box 184
Tsholotsho

Done

8 October 2014

The Manager.
Celtel Hunters
Tsholotsho

Done

Dear Sir / Madam

R.E: Acknowledgement of Receipt of a donation of Prizes for the speech and prize giving day.

We acknowledge receipt of the items tabulated below and their quantities.

Item / Description	Quantity
Rulers	2
Exercise books	30 + 4 Exam pads.
Erasers	10
Pencils	9 + 4 Sharpers.
Instrument sets	5
Book Khakhi covers	10
Blue Ball point pens	50
Crayons, small	2 packets x 12
Sticky Glue Stick	10
Prize money	$50.00
Ruler 30cm	4
Jumbo crayons	2 packets.
Sellotape	2

ZIMWATUGA PRIMARY SCHOOL
P.O BOX 149
TSHOLOTSHO

DONE

10 OCTOBER 2014

THE MANAGER
LODZI HUNTERS
TSHOLOTSHO

SIR/MADAM

RE: REQUEST FOR DONATIONS TOWARDS OUR SPEECH AND PRIZE GIVING CEREMONY/ECDB GRADUATION.

We write to kindly request for donations, in cash or kind towards our speech and prize giving ceremony which is to be held in conjunction with the ECDB graduation ceremony on Friday the ~~29th~~ 28th of November 2014 at Zimwatuga Primary School.

Your co-operation will be greatly appreciated.

Yours faithfully

ZIMWATUGA P. SCHOOL
P.O. BOX 149, TSHOLOTSHO
HEAD: ...
DATE: 10/10/14

MAPFUMO S. (A/HEAD).
0773 715 447

ZIMWATUGA PRIMARY SCHOOL
P.O BOX 149
TSHOLOTSHO

12 NOVEMBER 2014

RECEIVED
ZIMWATUGA PRIMARY SCHOOL
P. O. BOX 149
TSHOLOTSHO
DATE: 12/11/14

THE MANAGER
LODZI HUNTERS
TSHOLOTSHO

DEAR SIR / MADAM

REF : REQUEST FOR DONATION TOWARDS OUR SPEECH AND PRIZE GIVING DAY

On behalf of Zimwatuga Primary School, I write to kindly request for donations towards our speech and prize giving day to be held on Friday the 28th of November 2014. We expect to feed a crowd of 135 pupils, 80 parents and 20 invited guests. We also look forward to reward excelling pupils in the following disciplines. Academic performance from ECD A to Grade 7 — 9 pupils

Soccer — 1
Netball — 1
Athletics — 2 i.e 1 boy and 1 girl
Smartness — 2 i.e 1 boy and 1 girl
Punctuality — 1

SCHOOL
P. O. BOX
TSHOLOTSHO
DATE: 12/11/14

Yours Faithfully

J Tengende Acting Deputy Head

SASEDZA PRIMARYSCHOOL

Saseeka Primary School
P O Box 27
Tsholotsho

18 June 2013

The Manager
Lodzi Hunters
P O Box
Tsholotsho

Dear Sir / Madam

REF : Seeking assistance to complete a classroom block.

On behalf of Saseeka Community I hereby seek assistance to complete our classroom block which is now at roofing level. Materials need to complete the classroom block is all roofing materials. The school has got insufficient funds to complete the block.

Your intervention to this plight will be highly appreciated.

Yours faithfully

Samson D Sawu

THE HEAD
SASEEKA P. SCHOOL
BOX 27, TSHOLOTSHO
DATE 21-06-13

SAINT MARY'S PRIMARYSCHOOL

Done

ST MARY'S PRIMARY SCHOOL
P.O. Box 135
Tsholotsho

29 September 2014

THE MANAGER
LUDZI HUNTERS
P.O. Box
BULAWAYO.

Done

RE: GRADUATION DAY - 31 OCTOBER 2014

Dear Sir / Madam

The school would like to invite you to attend our Grade 8 graduation ceremony to be held on the 31st of October 2014 at 11.00 am, here at the school. In the same instance, we are appealing for your assistance in donating anything we can use on the day. The donation can be in cash or kind.

We hope to make this a memorable day. We know that your help will make that happen.

Thank you

Yours sincerely.

GARMENTS AHEAD

ST. MARY'S PRIMARY SCHOOL
P.O. 5
TSHOLOTSHO
DATE 29/09/14

DONE.

St Mary's School
P.O Box 135
Tsholotsho.

28 October 2014

DONE

The Manager
Lodzi Hunters.
Bulawayo.

RE: ACKNOWLEDGEMENT OF A DONATION GIVEN

Dear Sir,

We would like to thank you for the donation received. We got from you two satchels and boxes of pens, four mathematical sets, 5 sets of crayons, 30 exercise books, four writing pads, four rulers, two pairs of scissors two cellotapes ten erazers, four glue stick and $50.

Thank you for your cooperation.

Yours faithfully

[illegible] M. M/H

HEAD
ST MARY'S PRIMARY SCHOOL
P.O. BOX 135 TSHOLOTSHO
AFR 28-10-14

ST MARY'S PRY SCHOOL
P O BOX 135
TSHOLOTSHO

06 NOVEMBER 2013

THE MANAGER (LODZI HUNTERS)

RE: ASKING FOR A DONATION.

The above mentioned school is ill be holding a graduation ceremony for the ECD B class on the 15th of November. We are asking for your assistance either in cash or kind for this event.

Your co-operation is greatly appreciated.

Yours faithfully-

Garaweni, W. (Organiser)

ST MARY'S PRIMARY SCHOOL
P.O. BOX 135 TSHOLOTSHO
DATE 06.11.13.

[illegible] PCA School

Box 135

[illegible]

18 November 2013

The Manager Lodwi Miners

Re: ACKNOWLEDGING AN AMOUNT OF K200

This office has received school fees amounting of US $200 on the 14th November whereas we had asked for it to assist our ECD B Graduation ceremony which was held on the 16th of November.

Your assistance and co-operation is greatly appreciated.

Yours faithfully

18-11-13

Community Dev. Engineer. [illegible]

SAMAHURU HIGH SCHOOL

Samahani Adventist High School
P. O. Box 120
Tsholotsho

20 August 2013

THE HEAD
SAMAHANI ADVENTIST HIGH SCHOOL
P.O. BOX 120 TSHOLOTSHO
DATE 20/08/13
TEL

The Director
Hodzi Hunters

Dear Sir

REF: INVITATION TO SPEECH AND PRIZE GIVING DAY AS THE GUEST OF HONOUR

The above subject refers.

This letter serves to invite you to our Speech and Prize Giving Day. We would like you to grace the occassion as the Guest of Honour who is going to give the Keynote Address.

It is going to be on the 3rd of October 2013 at 9am.

Your presence will be greatly appreciated.

Yours faithfully

N. T. Ntaka
Headmaster

THE HEAD
SAMAHANI ADVENTIST HIGH SCHOOL
P.O. BOX 120 TSHOLOTSHO
DATE 20/08/13
TEL

3

DONE #150

SEVENTH-DAY ADVENTIST CHURCH

TSHOLOTSHO WEST DISTRICT

P.O. Box 2450
BULAWAYO

Cell: 0712 541 273
0712 300 995
0776 711 951

Dear LOBZI MINERALS PVT LTD

RE: REQUEST FOR DONATION

Greetings in the name of our soon coming King, Lord Jesus Christ.

We kindly solicit for your donation towards buying a gift package for our distinguished guests.

We will be concluding our first major district crusade on the 26th April 2014. It will be Celebration and Guest Day. You can either donate cash or buy your gift at **Adventist Book Centre.**

Find attached a copy detailed with proposed gifts and expenditure. God bless you as you consider our request.

Yours In Christ

.....

PASTOR NIMROD MOYO

SAMAHURU S.D.A CHURCH
P.O BOX 120
TSHOLOTSHO
DATE 06-12-13

GIFTS FOR DISTINGUISHED GUESTS

GUEST	PRESENT	COST	
CHIEF SIPHOSO	English Bible Zulu Hymn Book Steps to Christ Sabbath School Quarterly English Bible Doctrines * **TOTAL**	$ 30.00 $ 10.00 $ 10.00 $ 5.00 $ 2.00 **$ 47.00**	
HEADMAN	Ndebele Bible Zulu Hymn Book Ndebele Bible Doctrines **TOTAL**	$ 22.00 $ 10.00 $ 2.00 **$ 34.00**	
VILLAGE HEADS X 9	Ndebele Bible Patalika Hymn Book Ndebele Bible Doctrine **TOTAL**	$ 22.00 $ 3.00 $ 2.00 **$ 27.00**	
COUNCILLOR	Ndebele Bible Zulu Hymn Book Ndebele Bible Doctrine **TOTAL**	$ 22.00 $ 10.00 $ 2.00 **$ 34.00**	
OFFICER -IN-CHARGE ZRP	English Bible Zulu Bible Doctrine English Bible Doctrine **TOTAL**	$ 30.00 $ 10.00 $ 2.00 **$ 42.00**	
NURSE -IN-CHARGE	English Bible Zulu Hymn Book English Bible Doctrine **TOTAL**	$ 30.00 $ 10.00 $ 2.00 **$ 42.00**	
DDF STAFF	English Bible Zulu Hymn Book English Bible Doctrine **TOTAL**	$ 30.00 $ 10.00 $ 2.00 **$ 42.00**	
GIFTS WRAPPING PAPERS SELLOWTAPE DECORATED LABELS	20 sheets 1 roll 15 pieces **TOTAL**	$ 30.00 $ 1.00 $ 4.00 **$ 35.00**	

These can be bought at Adventist Book Centre.

SAMAHURU ADVENTIST MISSION
P.O.BOX 120
TSHOLOTSHO

12 November 2014

THE MANAGER DIRECTOR
LODZI HUNTERS
TSHOLOTSHO

Dear Sir

RE: SPECIAL REQUEST FOR ASSISTANCE DURING OUR EDUCATIONAL EXPO

As a mission we kindly request for assistance on this great occasion to be held over three days at Samahuru Mission from the 28th to 30th November 2014.

We are preparing for over three thousand five hundred guests.excluding locals and school pupils. Five Universities, many high schools from around Tsholotsho and special guests are expected to attend.

The purpose of the Educational Expo is to fundraise for the mission's infrastructure to acceptable standards. May you kindly assist us with game meat and feeding which you can afford for the occasion.

Thank you in advance. May God bless you.

Yours faithfully

N.T.Ntaka
HEAD

THE HEAD
SAMAHURU S.D.A.MISSION
P.O. BOX 120 TSHOLOTSHO
DATE 12.11.14
SEE

TSHOLOTSHO RURAL
DISTRICT COUNCIL
WARD ONE
COUNCILLOR:
SIGN:
DATE: 12-11-14

SEVENTH-DAY ADVENTIST CHURCH

SAMAHURU ADVENTIST PRIMARY SCHOOL

S.D.A.

P.O BOX 158
Tsholotsho

Cell: *+263 712 300 995 / 0715 557 289*
+263 733 928 995
Email: *samahuruAdventistmission@gmail.com*

Samahuru Adventist Primary School
Box 158
Tsholotsho

20 October 2014
THE DIRECTOR
LODZI HUNTERS
TSHOLOTSHO

Dear Sir/Madam

Appeal for donations for School Infrastructural Development

Kindly accept our appeal for donations for Samahuru Adventist Primary School Infrastructural Development. The school, founded in 1953, is in dire need of classrooms, boarding facilities, administration block, library, computer lab and staff accommodation. It is therefore soliciting for your assistance in cash or kind towards fulfilling its Strategic Development Goals.
Find attached a brochure of our Educational Awareness and fundraising initiative with more details
Our School Account Details are as follows : CBZ Tsholotsho branch
: Samahuru Primary School SDC Account No (b) (4) [redacted]

Your assistance in this regard will be greatly appreciated.

Yours Sincerely

S. Moyo
Head

THE HEAD
SAMAHURU S.D.A. PRIMARY SCHOOL
20 OCT 2014
SIGN

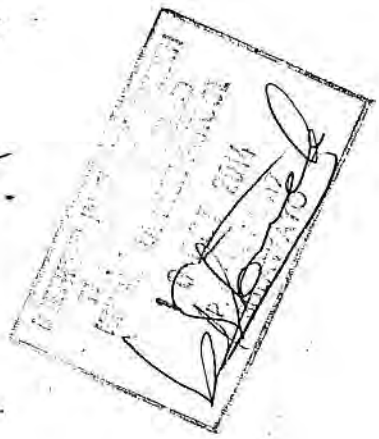
TSHOLOTSHO RURAL DISTRICT COUNCIL
WARD ONE
COUNCILLOR: L. Hlabangana
SIGN: Hlabangana
DATE 20-10-14

KHUMBULA HIGH SCHOOL

BRETHREN IN CHRIST CHURCH
KITUMBUA HIGH SCHOOL
P. BAG 15417
BUNGOMA

13
10/10/2014 10

DONE



THE MANAGER
0021 HUNTERS
NAIROBI

(15 Loads)

DEAR SIR/MADAM

RE: REQUEST FOR LOADS OF SAND (TRANSPORTATION OF)

The aforementioned School requests for loads of sand for its construction activities it has been a challenge to develop the School as the transport cost of the sand has been declining progress. The School has got no funds to hire people to transport sand here. The need has arisen for us to request your hand in this aspect.
The School is currently constructing a Science Lab and it intends to construct more structures in the near future hence it has a continuous need for sand.
We will be happy if you may provide at least 15 loads of sand.
May you consider this request with a lenient approach.

Yours Faithfully

W. KIBANDA (Deputy Head)
TEACHERS: Head (0734082755
Deputy (0773672746)

Khumbula High School
P.B. T. 5417
Bulawayo

25 October 2014

The Manager
Lodzi Hunters.

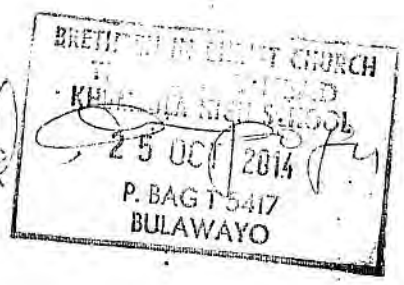
Done

Dear Sir/Madam

On behalf of Khumbula High School we want to thank you many times for the donation you gave us for the Speech and Prize giving day. We received stationary, catered and $50 cash. May God continue to bless you.

Yours Faithfully

O. Nyathi — Head



Brethren In Christ Church Zimbabwe

KHUMBULA HIGH SCHOOL

celebrating a vision

Dons

The Headmaster, Staff and Pupils request the pleasure of the company of

THE MANAGING DIRECTOR
LODZI HUNTERS

To The

ANNUAL SPEECH AND PRIZE GIVING DAY CEREMONY

ON

SARTUDAY 25TH of OCTOBER 2014

TIME 0830HRS.

THRIVING TO BE THE MOST PREFERRED SCHOOL

RSVP
The Headmaster
P.B.T. 5417 Bulawayo
Cell 0734 082 755

Brethren In Christ Church
Khumbula High School
P. Bag T5417
Bulawayo

14 November 2014

The Operations Manager
Lodzi Hunters
Tsholotsho

Dear Sir

RE: REQUEST FOR EQUIPMENT TO USE FOR LEVELLING OUR SPORTS FIELD

This letter serves to request for a machinery or equipment to use for levelling our sports field. We have done the clearing of the ground. We intend to use the field for our athletics competitions and also preparing for the BICC games and Ministry Games. Currently we do not have a sports field.

We hope your kind office will render us the assistance we need.

Thank you in advance

Yours faithfully

W. Sibanda pp.
Deputy Head

BRETHREN IN CHRIST CHURCH
THE DEPUTY HEAD
KHUMBULA HIGH SCHOOL
14 NOV 2014
P. BAG T 5417
BULAWAYO.