



**AFRICAN ELEPHANT FOUNDATION INTERNATIONAL**  
**(A-E-F-I)**

P.O. Box 50558 NAIROBI, TEL: 713342, FAX: 713342

African Elephant Foundation International  
Incorporated in the U.K. under Reg. No. 1017968  
is a Charitable Non-profit & Tax-Exempt Organisation

Our Ref:

Your Ref:

Date:

September 19, 1998

The Hon Mr G. Kgoroba  
Minister of Commerce  
Private Bag 004  
Gaborone  
Botswana

Dear Mr Kgoroba

We, the undersigned non-governmental organisations from all six regions represented in the Convention on International Trade in Endangered Species of Wild Fauna and Flora (CITES), wish to register our concerns relating to plans to export from South Africa a large number of juvenile wild elephants which were recently removed from their family groups in the Tuli Block in Botswana.

Our concerns are based on a wide range of issues relating to the letter and to the spirit of CITES as well as to the effect of these plans on elephant management and conservation in southern Africa.

We oppose the planned export of these animals because we regard their final destinations as inappropriate and unacceptable and because they were captured, shipped and are currently being held under injurious and cruel conditions. Moreover, export under these circumstances raises questions about whether and when a specimen may be treated under CITES as an "export" as opposed to a "re-export".

At the Tenth Meeting of the Conference of the Parties to CITES in June 1997, the elephant population of Botswana was transferred from Appendix I to Appendix II, with an annotation allowing the export of live elephants to "appropriate and acceptable destinations". However, there are serious problems concerning both the interpretation of this annotation and its application to the specific case of the Tuli Block elephants.

Firstly, while there is no agreed definition of "appropriate and acceptable destinations", a term first coined by South Africa in relation to the 1994 transfer of its white rhino population to Appendix II, we believe that it is South Africa's moral responsibility to apply - and to publicise for the benefit of the international community - a rational, conservation-based interpretation of

(this term and to ensure that the final destinations of these elephants are appropriate and acceptable both to CITES and to the wider conservation community. Export to zoos and safari parks in China, Germany, Switzerland and the United States would be a clear abdication of that responsibility.

The criteria for what is appropriate and acceptable should certainly include the consideration of whether the new conditions will allow the animals to thrive and breed. However, it has been established beyond doubt over many years that African elephants do not breed successfully in captivity. Between 1943 and 1992 a total of eleven African elephants were born in European zoos. Of these, one was stillborn, two died shortly after birth, two died before the age of ten, three died between the ages of ten and twenty. Only three were still living in 1992.

With respect to the fact that these young elephants have been removed from their families, we note that elephant expert Cynthia Moss, who has studied and lived amongst elephants for twenty years, has stated that "if a calf is to survive to adulthood it ..... must form intense, close bonds with its mother and other family members".

A second criterion should relate to the reputation of the individual or company intending to export or import wild animals. Questions have been raised in South Africa as to the bona fide of the individual involved in this case.

Secondly, there is uncertainty amongst the Parties to CITES as to the status of a specimen covered by the type of annotation applied to Botswana's elephants once primary export has taken place. A key question is whether, under the annotation, the specimen may be re-exported under the terms of Appendix II rather than Appendix I. This should be clarified before further export of these animals is considered.

Furthermore, CITES is not specific about what period of time may elapse before a "re-export" becomes simply "an export". Elephants kept for some months in South Africa could be regarded by some as originating in South Africa, and therefore to be Appendix I specimens whose export for commercial purposes is not permitted.

Thirdly, CITES Articles II (2) (c) and IV (2) (c) state clearly that live Appendix I and II specimens intended for export must be "so prepared and shipped as to minimise the risk of injury, damage to health or cruel treatment". The removal of elephants as young as four years of age from their families is part of the preparation for export and is undeniably cruel. In addition, the injuries sustained and the psychological trauma suffered during the capture, translocation and housing of the elephants are also an unacceptable result of this exercise.

It has been agreed by many elephant experts, including those from the Kruger National Park and the Johannesburg Zoo, that young elephants subjected to the trauma of being removed from their family groups are very likely to become behaviourally unpredictable. We believe it is the responsibility of the exporting country to take into account the possibility of a threat to humans and/or wildlife species once the elephants in question have reached their final destinations.

We understand that there was no consultation with local communities in the area before the capture took place, and that some communities feel that they have been undermined. This goes very much against the grain of Botswana's stated commitment to the involvement of local communities in conservation, particularly as it is the large commercial farmers who have, for the most part, benefited from the operation.

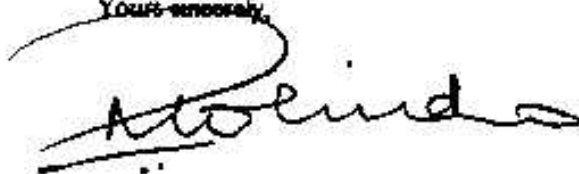
Finally, there have been suggestions that these elephants, if relocated back to the point of capture, could be absorbed back into their family groups. If this can be shown to be the case, we would be prepared to offer assistance to the government of Botswana in facilitating the safe return of these young elephants to their families. We believe that this would constitute both a rational and a compassionate solution to the problems caused by this operation.

Given the uncertainty surrounding the capture and export of these elephants and the international outcry it has engendered, we urge the government of Botswana:

- not to issue any further export permits for juvenile elephants;
- to consult local communities on their views of this capture operation and on their attitude to future operations of this kind;
- to ensure that live animals exported from Botswana are treated in accordance with CITES, that is, prepared (including capture) and shipped so as to minimise the risk of injury, damage to health and cruel treatment;
- to establish a definition of the term "appropriate and acceptable destinations" that is acceptable to the CITES community and to adhere to such a definition;
- to carry out research into the feasibility of returning these elephants to the wild, using the knowledge and experience of elephant experts both in southern Africa and in other parts of the continent.

We believe that this incident is causing a great deal of damage to Botswana's reputation and we urge your Ministry to do all it can to resolve the situation for the elephants currently being held and to ensure that such an operation is never repeated.

Yours sincerely,



Perez M. Olindo  
Chairman  
AEF-I

On behalf of:

Animal Alliance of Canada  
Animal Protection Institute  
Animal Welfare Institute (USA)  
Asian Conservation Awareness Network (International)  
Born Free Foundation (UK)  
Care for the Wild (International)  
Cetacean Society International  
David Shepherd Conservation Foundation (UK)  
Defenders of Wildlife (USA)  
Deutsches Tierhilfswerk (Germany)  
Earthtrust (USA)  
Eastern Caribbean Coalition for Environmental Awareness  
Environmental Investigation Agency (UK)  
Fundacion Cetus (Argentina)  
Greenpeace International  
Humane Society of Canada  
Humane Society International  
Humane Society of the United States  
International Primate Protection League  
International Wildlife Coalition  
Japan Wildlife Conservation Society  
Orangutan Foundation (UK)  
Regional Wildlife Management Program, National University of Costa Rica  
Royal Society for the Prevention of Cruelty to Animals (UK)  
Save the Elephant (Kenya)  
Teyeliz, AC (Mexico)  
Tusk Force (UK)  
Wildlife Protection Society of India  
Zoocheck Canada