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13 March 2015

The Head of Department
National Department of Environmental Affairs
ATT: Mr Mpho Tjiane
Email: mtjiane@environment.gov.za

Dear Mr Tjiane

RE: WORKSHOP INVITATION & CALL FOR PUBLIC INPUTS TO THE COMMITTEE OF INQUIRY INTO POSSIBILITY OF RHINO HORN TRADE

WESSA (the Wildlife and Environment Society of South Africa) is a dynamic South African environmental NGO with a mission to implement high impact environmental and conservation projects that promote public participation in caring for the Earth (www.wessa.org.za). WESSA has a remarkable history of almost 90 years and a proud track record of enabling individuals and organisations to use natural resources sustainably and effectively, through our strategic partnerships. We are driven by the key focus areas of our work, which are aimed at the conservation of life-supporting ecosystems such as water and biodiversity.

Rhino poaching has reached crisis levels in South Africa, and requires innovative and rational solutions. The main objective of our **WESSA Rhino Initiative** is to raise funds and awareness in order to help curb rhino poaching, and to contribute towards a number of important national intervention strategies to secure wild rhino populations, forever. WESSA was one of the main fund-raising and awareness-raising campaigners for bringing white and black rhinos back from the brink of local extinction in South Africa, in the late 1970s and early '80s.

WESSA notes with that the Department of Environmental Affairs (DEA) is considering requesting CITES to down-list rhinos, that would allow restricted trade in rhino horn and possibly other body parts (hence referred to as 'rhino horn trade'). We also note that your Department has established a panel of experts (the Committee of Inquiry) to advise the DEA on this proposal. WESSA is encouraged that this Committee will be giving effect to the Principles of NEMA by inviting submissions from stakeholders in this matter.

In October last year, WESSA held a 'think-tank' on the rhino horn proposal, consulting with wildlife trade experts. It is WESSA's considered opinion that the proposed CITES down-listing of rhino species *Ceratotherium simum* and *Diceros bicornis*, for the intended purposes of reducing poaching demand and/or profiteering from horn sales, will instead lead to the rapid demise of Southern African populations of this species. WESSA appreciates the increase in the cost of securing rhino but feel that there are alternatives that need to be addressed first before contemplating rhino horn trade.

We intend to make a written submission to the Committee of Inquiry, by the requested date of 20 March 2015. Our submission will advance our opinion on the basis of the following, but not limited to:

1. The example of recent once-off sales of elephant ivory has resulted in greater public acceptance of ivory ownership and hence market demand for ivory, which has exacerbated ivory poaching across Africa and South-East Asia. These sales were intended to undercut the illegal ivory trade prices and hence discourage elephant poaching, as well as to divert the illegal trade into legal channels that would instead benefit the supplier conservation agencies. Global evidence is that the very opposite occurred, and WESSA holds that the South African authorities and CITES will never achieve the capacity to prevent the same happening with legalising rhino horn trade;
2. That the foreign market price is predicted to remain so high as to still encourage widespread poaching of rhinos, while South African rhino owners will have to contend with artificially controlled lower export prices for horn; hence the funds available to protect and manage their rhino herds. We contend that this situation will result in the continued contraction of the rhino conservation estate in South Africa;
3. That after encouraging foreign states such as China to create and enforce laws against rhino trade, on the basis of combating rhino poaching, preserving our biodiversity assets and the ethics of killing rhinos for their horn (a product that has shown to have no substantive medicinal value), that South Africa's request to open rhino horn trade will be regarded as a hypocritical, profiteering about turn;
4. That it will create considerable legal problems for South Africa and these foreign states in the matter of reconciling persons convicted for rhino poaching and illegal trade, as well as such persons injured or killed in the prevention of poaching and in the pursuit of convictions;
5. That South Africa does not enjoy the confidence of the voting members of CITES that South Africa has the capacity to achieve the safeguards required by CITES for legalising this trade, in preventing poached rhino products entering the legal system (as what has happened with the ivory poaching). Our concern is that a detailed watertight mechanism has yet to be put forward as how legal trade could be managed and controlled in both the demand, transitional and range states;
6. South African conservation authorities have enjoyed a reputation for being dedicated, competent and innovative in dealing with competing needs between local communities and wildlife. In this regard, we suspect that should South Africa approach CITES to down-list rhinos, that South Africa will be undermining our conservation reputation and status in the global conservation area for proposing a wildlife trade that we have little chance of controlling and have generally have led to the decrease in wild populations through increased market-driven poaching. DEA will also be seen to be working in opposition to global conservation efforts by international organisations such as WWF and TRAFFIC, who have been making considerable investments into changing public attitudes in rhino horn consumer states. This will have serious repercussions for our perceived global conservation status and ethical basis, and hence for our nature-based tourism market and in receiving global conservation grants; and
7. That the promotion of alternative income sources from rhinos can offset the costs incurred in stocking and managing them. We intend to show that by allowing an increased (genuine, sustainable) hunting industry (but without permitting the export of trophy horns or other rhino body parts), as well as other non-exportable uses of rhino products. We hold that increasing the sustainable utilisation by hunting can deliver significant economic benefits to rhino stock holders, will generate significant indirect, local economic returns (principally through tourism related jobs and services); and which can be effectively regulated.

WESSA hopes that this Committee of Inquiry is an earnest consultation mechanism for developing a policy that has the best interests of the remaining rhino at heart, and that it is not a window-dressing exercise for government in a bid to profiteer for the national fiscus. WESSA hopes that the Committee and in turn, the DEA, will heed the submissions of stakeholders cautioning against this down-listing proposal.

Yours faithfully



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