



**President of Zimbabwe
His Excellency Emmerson Mnangagwa**

**The Endangered Species Import and Export Management Office
Of the People's Republic of China
CITES
Wildlife Conservation Department
of National Forestry and Grassland Administration**

**Sofie H. Flensburg
Legal Officer, Legal Affairs and Compliance
CITES Secretariat**

**Ivonne Higuero
Secretary General**

**President Felix-Antoine Tshisekedi Tshilombo
Chairperson of the African Union**

IUCN SSC African Elephant Specialist Group

Co-chairs of the African Elephant Coalition

10 July 2021

Your Excellency, Honourable Representatives,

OPEN LETTER

RE: IMMINENT CAPTURE OF YOUNG ELEPHANTS IN ZIMBABWE FOR EXPORT TO CAPTIVE FACILITIES

The Pro Elephant Network (PREN) consists of an international community of diverse individuals and organizations, comprising specific expertise on wild and captive elephants, from both western and eastern academies, including the fields of science, health, conservation, elephant welfare, economics, community leadership, social justice and the law.

We were reliably informed and are deeply concerned about the imminent capture of young elephants for export from Zimbabwe, to captive locations overseas.

There are also allegations that the elephants would be laundered through an African range state, before proceeding towards a final destination overseas.

Our concerns are based on our understanding of elephant biology and ethology, of international agreements and national legislation, as well as public sentiment within Africa and globally.



We urgently call on all the relevant authorities to immediately suspend any plans to capture live elephants for export.

According to the CITES trade database, between 2012 and 2019, Zimbabwe exported 140 juvenile elephants, to captive facilities in China, and another four to the United Arab Emirates. Of these elephants, 22 are confirmed or are presumed to have died. Reports indicate that many others have died in the process of capture and preparation for export.

National legislation within Zimbabwe challenges the right of the government to export elephants, without the consent of their rightful owners, the people of Zimbabwe. This consent has not been established. Moreover, it appears that the actions of the Zimbabwe government run counter to both domestic legislation—notably the Constitution of Zimbabwe, the Environmental Management Act and the Prevention of Cruelty to Animals Act—and the Convention on International Trade in Endangered Species of Wild Fauna and Flora (CITES) to which Zimbabwe is a signatory.

At the 18th Conference of the Parties to CITES (CoP18) held in Geneva in August 2019, Parties [overwhelmingly](#) agreed that the only 'Appropriate and Acceptable destination' for live elephants exported from Zimbabwe or Botswana should be *"in-situ conservation programmes or secure areas in the wild, within the species' natural and historical range in Africa, except in exceptional circumstances where, in consultation with the Animals Committee, through its Chair with the support of the Secretariat, and in consultation with the IUCN African Elephant Specialist Group, it is considered that a transfer to ex-situ locations will provide demonstrable in-situ conservation benefits for African elephants, or in the case of temporary transfer in emergency situations."* These amendments (Resolution. Conf. [11.20 Rev. CoP18](#)), which were supported by an overwhelming majority of Parties, came into effect at the end of November 2019, bringing the rules that apply to Zimbabwe and Botswana into line with those for other countries with Appendix II listed elephant populations. Following that meeting, Zimbabwe took out a reservation against the changes to Resolution Conf. 11.20 (Rev. CoP18) described above, the validity of which is disputed. Even if considered valid, Zimbabwe's reservation would only allow trade with non-CITES parties or Parties with a valid reservation on the same issue. The validity of the reservation has been referred to the next CITES Standing Committee meeting for consideration.

During the 31st meeting of the CITES Animal Committee (AC31), which took place online in June 2021, the Zimbabwean delegate Rosaline Mandisodza, Chief ecologist at ZimParks stated, in respect of live elephant exports, that "We are no longer trading outside of range. We are guided by the animals committee and the secretariat". She also indicated that Zimbabwe would be seeking to establish "what happened to the elephants now" and mentioned the need "to talk about reports and working with recipient countries". These statements, which were accepted in good faith by those present at the meeting, appear to be undermined by the recent reports of plans for further captures.

It is universally recognized that elephants are wide-ranging, vastly intelligent, sentient beings with a highly organised social structure and form strong family bonds that can last a lifetime. They require access to large, complex, stimulating ecological and social environments, and the freedom to exercise choice over their foraging options and companions. These needs cannot be met under captive conditions and elephants so deprived inevitably suffer from physical and psychological pathologies. Young elephants are greatly dependent on their mothers and other family members to acquire necessary social and behavioural skills. Male calves only leave their natal families at 12 to 15 years old and females remain for life. Disruption of this bond through the removal of young elephants from their family groups is physically and psychologically traumatic for both the calves and remaining families and groups, and the negative effects

can be severe and lifelong.¹⁻²The well-documented symptoms of Post-Traumatic Stress Disorder (PTSD)³ displayed by captive elephants in zoos around the world are testimony to the damage caused by the operations of capture and long-distance transport to *ex situ* locations.

A 2017 expose revealed footage during capture, confirming concerns that elephants are subjected to harsh and cruel treatment to force them to submit.⁴ In February 2019, further video footage of young calves (some as young as two years) showed the youngsters frantically pacing around their holding pens in Hwange, with some showing signs of stress such as temporal streaming (dark streaks of secretion down the side of the face from the temporal gland) and others demonstrating wide-eyed, ears-splayed, chin-up defensive postures.⁵ According to a paper submitted by the Governments of Burkina Faso and Niger, presented at the 69th meeting of the Standing Committee of the Convention on International Trade in Endangered Species (CITES SC69) in Geneva (Switzerland), 27 November – 1 December 2017, “*captured calves transported to holding facilities suffer depression, lethargy, anxiety, increased stress, intra-specific aggression, and a diminished or non-existent appetite, sometimes resulting in death or contributing to premature mortality. Training in temporary facilities may include food and/or light deprivation, restriction of movement, forcing the animal into an uncomfortable position for extended periods of time, and regular beatings*”.⁶

Based on the body of overwhelming scientific evidence, South Africa took the commendable decision in 2008 to ban the capture of elephants from the wild for the purposes of captivity and trade under the terms of the National Norms and Standards for the Management of Elephants in South Africa (2008), and has recently reiterated its intention to desist from capturing wild elephants and other wild animals for export to captive facilities. The International Union for Conservation of Nature’s Species Survival Commission African Elephant Specialist Group opposes the removal of African elephants from the wild for any captive use.⁷ This position was reaffirmed at the group’s meeting in Pretoria, South Africa in July 2019. On 6 September 2019, elephant specialists from around Africa and the world participated in an Indaba in South Africa, ‘*Taking Elephants out of the Room*’, to scrutinize the science, policy and welfare issues relating to elephants in captivity. The overwhelming conclusion of the Captive Elephant Indaba was that no new elephants should be placed in captivity and elephants currently in captivity should be rewilded.⁸

The export of live wild-caught elephants to zoos also deprives the regions from which they originate of the hugely important ecological role elephants play, through the creation and remodelling of habitat and dispersal of seeds which benefits countless other species, and through their value to climate change mitigation as significant sequesters of

¹ G. A. Bradshaw and Allan N. Schore, “How Elephants Are Opening Doors: Developmental Neuroethology, Attachment and Social Context,” *Ethology* 113, no. 5 (2007): 426–36, <https://doi.org/10.1111/j.1439-0310.2007.01333.x>; Graeme Shannon et al., “Effects of Social Disruption in Elephants Persist Decades after Culling,” *Frontiers in Zoology* 10, no. 1 (2013), <https://doi.org/10.1186/1742-9994-10-62>; Rob Slotow et al., “Older Bull Elephants Control Young Males,” *Nature* 408, no. 6811 (2000): 425–26, <https://doi.org/10.1038/35044191>; G. A. Bradshaw et al., “Elephant Breakdown,” *Nature* 433, no. 7028 (2005): 807–807, <https://doi.org/10.1038/433807a>.

² Shannon, G., Slotow, R., Durant, S. M., Sayialel, K. N., Poole, J., Moss, C., & McComb, K. J. F. i. Z. (2013), Effects of social disruption in elephants persist decades after culling. *Frontiers in Zoology*, 10(1): 62. doi:10.1186/1742-9994-10-62

³ Graeme Shannon et al., “Effects of Social Disruption in Elephants Persist Decades after Culling,” *Frontiers in Zoology* 10, no. 1 (2013), <https://doi.org/10.1186/1742-9994-10-62>; G. A. Bradshaw et al., “Elephant Breakdown,” *Nature* 433, no. 7028 (2005): 807–807, <https://doi.org/10.1038/433807a>.

⁴ <https://www.theguardian.com/environment/2017/oct/03/exclusive-footage-shows-young-elephants-being-captured-in-zimbabwe-for-chinese-zoos>

⁵ <https://conservationaction.co.za/resources/reports/new-video-zimbabwes-35-captured-baby-elephants-terrified-in-pens/>

⁶ <https://cites.org/sites/default/files/eng/com/sc/69/inf/E-SC69-Inf-36.pdf>

⁷ <https://www.iucn.org/ssc-groups/mammals/african-elephant-specialist-group/afesg-statements/removal-african-elephants-captive-use>

⁸ <https://emsfoundation.org.za/elephants-in-captivity-to-come-under-the-spotlight/>



carbon⁹. Africa's savannahs and forests have lost 95% or more of their elephants in modern times, and with species and biodiversity in a global crisis, Africa can ill afford to lose more.

We respectfully request the government of Zimbabwe to terminate plans for this elephant capture and to act in accordance with established knowledge of the negative impacts of capture and captivity on wild elephants and their herds, international and national legislation, and widespread and ever-increasing worldwide public opinion.

Please accept, Excellencies, the assurances of our highest consideration.

Yours Sincerely,

A handwritten signature in black ink, appearing to read 'Stefania Falcon', with a checkmark at the end.

Stefania Falcon
On behalf of PREN

stefania@proelephantnetwork.org

Mobile +27 (0) 73 301-21-07



www.proelephantnetwork.org

This letter is for urgent media diffusion

SIGNING MEMBERS:

Owais Awan	Advocate High Court, Islamabad
Suparna Baksi-Ganguly	President and Co-Founder, Wildlife Rescue & Rehabilitation Center, Bangalore, India
Dr Brett Bard	Veterinarian, South Africa
Dr Jessica Bell Rizzolo	Postdoctoral Researcher, the Conservation Criminology Lab, Dep of Fisheries and Wildlife, Michigan State University
Janey Clegg	Committee Member, SPCA Mutare, Zimbabwe
Professor David Bilchitz	Director, South African Institute for Advanced Constitutional, Public and Human Rights and International Law - South Africa

⁹ <https://www.imf.org/external/pubs/ft/fandd/2020/09/how-african-elephants-fight-climate-change-ralph-chami.htm>





Megan Carr	Founder, Rhinos in Africa
Dr Betsy Coville	Wildlife Veterinarian – USA
Nomusa Dube	Founder, Zimbabwe Elephant Foundation
David Ebert	Advocate, Founder Director of The Animal Defense Partnership – USA
Stefania Falcon	Co-Founder, Future 4 Wildlife – South Africa
Michele Franko	Captive Elephant Caregiver and Advocate – USA
Dr Toni Frohoff	Ethologist and Behavioral Biologist, Founder of TerraMar
Chief Stephen Fritz	Indigenous Leader, South Peninsula Khoi Council – South Africa
Dr Marion E. Garai	Elephant Behavior Specialist and Trustee at the Elephant Reintegration Trust - South Africa
Rachel Harris	Managing Director, Elephant Human Relationship Aid, Namibia
Dr Ross Harvey	Environmental Economist, Botswana
Heike Henderson-Altenstein	Director, Future 4 Elephants e.V.
Dr Michelle Henley	Director, ElephantsAlive! – Elephant Specialist Advisory Group, South Africa
Alok Hissarwala Gupta	Elephant Specialist, Federation of Indian Animal Protection Organizations - India
Iris Ho	Senior Wildlife Specialist, The Humane Society International
Peter Hodgskin	Founder, Hands-off Fernkloof, South Africa
Lynne James	Independent, Elephant Conservation, Zimbabwe
Dr Mark Jones	Veterinarian, Born Free Foundation - UK
David Kabambo	Founder Director of Peace for Conservation – Wildlife Management - Tanzania
Dr Paula Kahumbu	WildlifeDirect, Kenya
Professor Mohan Kharel	Tribhuvan University, Kathmandu, Nepal
Jim Karani	Advocate, Lawyers for Animal Protection in Africa – Kenya





Dr Winnie Kiiru	Founder, Conservation Kenya
Brigitte Kornetzky	President and Founder of Elefanten in Not - Switzerland / India
Kahindi Lekalhaile	Africa Network for Animal Welfare, Kenya
Dr Smaragda Law	Director, Ban Animal Trading, South Africa
Dr Keith Lindsay	Conservation Biologist, Amboseli Trust for Elephant - Kenya
Giorgio Lombardi	Warden Vogelgat Private Nature Reserve, South Africa
Linda Masudze	Advocate 4 Earth, Zimbabwe
Varda Mehrotra	Environmentalist and Independent Researcher – India
Brett Mitchell	Director, Elephant Reintegration Trust, South Africa
Dr Nurzhafarina Binti Othman	Founder: Seratu Aatai, Elephant Conservation and Research Coordinator at HUTAN-KOCP - Malaysia
Sharon Pincott	Elephant Behavioural Specialist, ex-Hwange, Zimbabwe
Michele Pickover	Director, EMS Foundation, South Africa
Dr Yolanda Pretorius	SA Wildlife College, Elephant Behavioural Specialist, South Africa
Dr Jan Schmidt-Burbach	Veterinarian, Head of Wildlife Research and Animal Welfare, World Animal Protection International
Antoinette Van de Water	Director, Bring the Elephant Home, South Africa
Vasanthi Vadi	CEO – Federation of Indian Animal Protection Organisations – India
Prof Dan Wylie	Rhodes University, South Africa

