



Via electronic delivery

Addressed to:

Martha Williams

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Secretary Deb Haaland

U.S. Secretary of the Interior
Department of the Interior
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Tuesday 20 March 2024

Dear Ms Martha Williams and Ms Deb Haaland,

URGENT APPEAL

USA Citizens are Responsible for Killing Some of the Last Big Tuskers in Africa: We Hereby Request the USFWS to implement an Immediate Ban on the Import of Elephant Trophies from Africa into the United States of America

The African Elephant was listed as threatened under the Endangered Species Act (ESA) in 1978. At the time, the U.S. Fish and Wildlife Service published a [rule under section 4\(d\) of the ESA](#) to regulate the import and certain interstate commerce of the species in the United States.

Section 4(d) of the ESA provides the Secretary of the Interior with broad discretion to publish appropriate regulations tailored to the specific conservation needs of a species. The 4(d) rule has been amended multiple times to address changing threats to African elephants. The fourth and most recent amendment, made in 2016, was in response to increased poaching of elephants for ivory and led to a near-total ban on the trade in ivory in the United States.

In 2021 the African forest elephant (*Loxodonta cyclotis*) was classified as Critically Endangered and the African savanna elephant (*Loxodonta africana*) as Endangered on the IUCN Red List of Threatened Species

The Amboseli population of savanna elephants includes adult males with some of the largest tusks on the African continent due to the particular genetic makeup of these elephants and the many years of protection they have been afforded from trophy hunting and poaching.

In late 2023, however, two adult males from the Amboseli population, with tusks reportedly weighing over 100 lbs. were shot south of the border in Tanzania, ending a 30-year trophy hunting moratorium in the Enduimet Wildlife Management Area. A third elephant was shot in the same area in late February 2024 and, as of 10 March, a further three licenses are said to have been granted putting the integrity of the Amboseli elephant population in serious jeopardy.

Introduction to the Pro Elephant Network

The [Pro Elephant Network](#) (PREN) consists of a global community of diverse individuals and organisations, united in their common concern for Nature, their deep association with the natural world and their commitment to apply their experience for the greater good.

These individuals and organisations embrace expertise from both within Western academies (including the fields of science, conservation, animal welfare, human and non-human rights, philosophy and ethics, advocacy, economics, community leadership, writing, the media, social justice and the law) and the indigenous paradigm.

PREN provides a strong framework for cooperation and networking and aims to end and reverse the impacts of harmful practices towards Elephants including but not limited to capture, imprisonment, captive breeding, abuse, training, exhibition, commercial contact and trade in live Elephants and body parts. Employing evidence-based information, PREN promotes the intrinsic value and self-determination of free-living elephants for the purpose of ending all exploitation of elephants.

The Amboseli Elephant Project

The [Amboseli elephant population](#) is a cross-border population of African savanna elephants inhabiting both Kenya and Tanzania and frequently crossing the border between the two. According to the content of an urgent appeal published by [Elephant Voices](#), [Big Life Foundation](#) and [Amboseli Trust for Elephants](#), the project aims to end trophy hunting in the Enduimet Wildlife Area of Tanzania.

The ecosystem occupied by the Amboseli elephants includes Amboseli National Park and the surrounding conservancies and lands in Kenya, a total area measuring approximately 8000 km². It also encompasses the Enduimet Wildlife Management Area and beyond in Tanzania. There are currently approximately 2000 elephants using this ecosystem. For 51 years these elephants have been closely studied by the Amboseli Elephant Research Project (AERP). It is the longest, continuously running study in which a number of our colleagues are intricately involved.

The content of the aforementioned [appeal](#) confirms that each elephant is known individually, has a code number or name and is documented photographically. "Birth dates for all but a few of the older individuals are known as well as the mother and the family and, in some cases, the father. A detailed [database](#) contains records of over 4000 individual elephants identified over five decades, including births and deaths. A linked database houses every recorded sighting. The Amboseli data is an extraordinarily rich and important body of knowledge. Each individual, each record, is a building block that underpins this immense scientific achievement gained over the past half a century. Indeed, much of what we know about elephant behaviour, communication, social structure, demography, reproduction and genetics, has resulted from this study.

There are 63 elephant families in the Amboseli population of which 17 families, consisting of 365 members, regularly spend time in Tanzania. In addition, approximately 30 adult male elephants, over the age of 25 years, use the Enduimet area and beyond in Tanzania as part of their home range. For half a century Enduimet has been

a favourite area for a particular set of adult males who make use of it as part of their “bull area”, which is an area they use when they are bulking up for their next reproductively active period. When they are productively active, they return to central Amboseli in search of mates. It is reasonable to assume that any elephant found in this area of Tanzania is part of the cross-border population and has been captured by AERP's long-term study.”

Concerning Upsurge of Trophy Hunting of Amboseli Big Tuskers

The Amboseli population includes adult males with some of the largest tusks on the continent due to the particular genetic makeup of these elephants (the largest tusks ever collected and displayed in the British Museum come from this population) and to the years of protection, they have been afforded from trophy hunting and poaching.

In 1994 there was an international outcry when four individually known elephants, subjects of the Amboseli Elephant Research Project, were shot by trophy hunters on the Tanzanian side of the border. In 1995 a moratorium on trophy hunting of this cross-border elephant population was agreed upon between the two nations.

The [Amboseli Trust for Elephants team](#) has been able to [identify one of the males](#) who was recently shot by trophy hunters in Tanzania. According to the team, “He was Gilgil, the son of Golda, matriarch of the GB family. His father was the magnificent Dionysus. At only 35 years old when he was killed, Gilgil was just entering his prime reproductive years. He was the first of three elephants killed, Gilgil in September, another in November, and a third more recently. [...] We have been informed that three more hunting permits for elephants have been issued. We are doing everything we can to stop the slaughter of these scientifically, economically, and aesthetically valuable individuals. For us, their most important value is their social and genetic contribution to the Amboseli elephant population”.

Disturbing American Trophy Hunting Trends

According to [data from the U.S. Fish and Wildlife Service](#) obtained by the Center for Biological Diversity (CBD), from 2016 through 2020 more than 700 000 hunting trophies, largely derived from exotic animals, such as lions, rhinos, giraffes and zebras were imported to the United States.

In a [press release](#), the CBD's Senior Attorney Tanya Sanerib said: “The vast volume of hunting trophies pouring into the United States represents a massive exploitation of wildlife during a global extinction crisis”.

“Data shows a largely steady and sizable annual increase” of trophy imports between 2016 and 2019, excluding a minor decline in 2017. In 2016 there were 109 579 imports; in 2017 there were 108 490 imports; in 2018 there were 212 393 imports and in 2019 there were 234 532 imports. The Centre said that the data reveals “disturbing U.S. trophy trends,” noting that some wealthy trophy hunters travelled during the pandemic.” The USA is the [largest](#) importer of hunting trophies.

Time to Take Sides on Trophy Hunting in Africa

[Dr Paula Kahumbu](#), a member of PREN and CEO of [Wildlife Direct](#) has [appealed](#) to the Tanzanian government and the international diplomatic community. “How do you measure the cost of cultural and traditional disrespect?” Her [petition](#) to the President of the United Republic of Tanzania, calling for an immediate ban on elephant trophy hunting within the Tanzania range of the Amboseli elephants, raised 8000 signatures in the first 48 hours and is supported by [high-profile Kenyans](#).

The push from the Global North for African countries to embrace trophy hunting as a means of conservation and economic development is not only misguided but deeply offensive. Trophy hunting does not aid poverty alleviation.

“It is an outdated and morally corrupt practice. The term **population explosion** is not only pejorative but echoes colonial-era rhetoric aimed at controlling and managing the African populace. This language frames Africa as a problem to be solved, not a continent of wealth in heritage diverse peoples and rich histories. It justifies intrusive conservation efforts, including trophy hunting, under the guise of managing wildlife populations, without addressing underlying issues such as habitat loss of human-wildlife conflict resolution.”

Appeal for the Immediate Ban on the Import of Elephant Trophies from Africa into the United States of America

In March 2022, a formal [comprehensive request](#) was made to your office, based upon the best available scientific evidence, for the denial of elephant trophy imports from African countries.

Furthermore, in July 2023 organizations [requested](#) the halt of elephant trophy imports until the revised African Elephant 4(d) Rule is final. The U.S. Fish and Wildlife Service proposed a revision to the rule for the African elephant under section 4(d) of the Endangered Species Act (ESA) in response to the increase in international trade of live elephants, particularly of wild-sourced elephants, the U.S. Fish and Wildlife Service aims to ensure activities with live African elephants under US jurisdiction contribute to enhancing the conservation of the species and do not contribute to the decline in populations of the species in the wild.

[Organizations](#) are also urging the Tanzanian government to take immediate action by reinstating the critical cross-border agreement with Kenya. Members of PREN have supported [petitions](#) for a number of years to your office for the cessation of trophy imports of endangered species.

The further argument against the hunting of a species that is in such sharp decline is set out in an [open letter](#) to the chairman of the Tanzanian Hunting Operators Association.

In summation, the undersigned members of PREN are appealing to the United States for an immediate ban on the import of elephant trophies from Africa. Only by closing this channel of exploitation down completely can we ensure the survival of the remaining elephant super tuskers.

Yours sincerely,



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SIGNING MEMBERS OF THE PRO ELEPHANT NETWORK

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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
Megan Carr	Founder, Rhinos in Africa
Lenin Chisaira	Founder, Advocates 4 Earth – Green Law Connect, Zimbabwe
Dr Betsy Coville	Exotic / Wildlife Animal Veterinarian
Dr Harvey Croze	DPhil (Oxon) Collaborating Researcher – Amboseli Trust for Elephants – Kenya
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

Daniela Freyer	Co-Founder, Pro Wildlife, Germany
Michele Franko	Captive Elephant Caregiver and Advocate – USA
Chief Stephen Fritz	Indigenous Leader, South Peninsula Khoi Council – South Africa
Dr Toni Frohoff	Ethologist and Behavioral Biologist, Founder of TerraMar Research
Dr Marion E. Garai	Elephant Behaviour Specialist - South Africa
Georgina Groves	Independent Elephant Behaviour Specialist
Dr Ross Harvey	Environmental Economist, Botswana
Heike Henderson-Altenstein	Co-Founder, Future for Elephants e.V.
Iris Ho	Elephant Policy Consultant and Head of Campaigns and Policy for Pan African Sanctuary Alliance (PASA)
Sangita Iyer	B.Sc., M.A., Founder of Voice for Asian Elephants Society, Nat Geo Explorer and Wildlife Filmmaker
David Kabambo	Founder Director of Peace for Conservation – Wildlife Management - Tanzania
Dr Paula Kahumbu	WildlifeDirect, Kenya
Professor Mohan Kharel	Tribhuvan University, Kathmandu, Nepal
Duncan McNair	Lawyer, CEO of Save The Asian Elephants
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
Professor Bob Jacobs	Neuroscience Researcher – Colorado College – USA
Lynne James	Independent, Elephant Conservation, Zimbabwe
Dr Mark Jones	Veterinarian, Born Free Foundation - UK
Kahindi Lekalhaile	Africa Network for Animal Welfare, Kenya
Dr Smaragda Louw	Director, Ban Animal Trading, South Africa
Dr W Keith Lindsay	Conservation Biologist and Collaborating Researcher, Amboseli Trust for Elephants - Kenya
Linda Masudze	Advocate 4 Earth, Zimbabwe
Varda Mehrotra	Co-Founder, Samayu, A Just World – India
Dr Cynthia Moss	Director, Amboseli Trust for Elephants, Kenya
Dr Nurzhafarina Binti Othman	Founder: Seratu Aatai, Elephant Conservation and Research Coordinator at HUTAN-KOCP - Malaysia
Tina Papadopoulou	Biologist, Co-Founder of Friends of Bunka
Sharon Pincott	Elephant Behavioural Specialist, ex-Hwange, Zimbabwe
Michele Pickover	Executive Director, EMS Foundation, South Africa
Bharati Ramachandran	CEO of the Federation of Indian Animal Protection Organisations – India
Ian Redmond OBE	Founder, African Ele-Fund and Elefriends Campaign, Chairman of Ape Alliance and Co-founder of Rebalance Earth
Dr Jan Schmidt-Burbach	Veterinarian, Head of Wildlife Research and Animal Welfare, World Animal Protection International
Mark Stratton	Investigative Journalist, Founder of Friends of Bunka
Dr Liz Tyson	Animal Welfare Law, Programs Director - Born Free USA
Vasanthi Vadi	Trustee of the Federation of Indian Animal Protection Organisations – India
Prof Dan Wylie	Rhodes University, South Africa

THIS APPEAL IS ALSO ENDORSED BY

Dr Joice Poole	Scientific Director, ElephantVoices
Henry Smith	Member of Parliament, Crawley Constituency, UK
Will Travers OBE	Co-Founder and Executive President, Born Free Foundation, UK
Damian Aspinall	Chairman, Aspinall Foundation, UK
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Dr Rosalind Reeve	Lawyer & senior adviser, David Shepherd Wildlife Foundation & Fondation Franz Weber
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Renee Bish and Peter Oxford	Co-Founders, Betty’s Bay Baboon Action Group
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Cora Bailey	Founder, Community Led Animal Welfare
Prof Vishwas Satgar	Co-Founder, Co-Operative and Policy Alternative Center
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Jabu Myeni	Founder, Gifted for Good
Linda Tucker	CEO Founder, Global White Lion Protection Trust
Laura Pasanisi -	Founder, Green Group Simonstown
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