

# **SILENCES AND SPIN DOCTORING: ACCESS TO INFORMATION ON ELEPHANTS IN SOUTH AFRICA**



## **AN ANIMAL RIGHTS AFRICA (ARA) INVESTIGATIVE REPORT**

22 October 2008

**A COMMISSIONED REPORT: RESEARCHED AND WRITTEN BY MIKE CADMAN.**

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**PUBLISHED BY ANIMAL RIGHTS AFRICA**

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# TABLE OF CONTENTS

<b>ACRONYMS.....</b>	<b>4</b>
<b>PREFACE .....</b>	<b>5</b>
<b>BACKGROUND .....</b>	<b>7</b>
<b>INTRODUCTION .....</b>	<b>8</b>
<b>NATIONAL NORMS AND STANDARDS .....</b>	<b>11</b>
<b>MINIMUM STANDARDS.....</b>	<b>11</b>
<b>MANAGEMENT PLANS FOR FREE RANGING ELEPHANTS.....</b>	<b>14</b>
Responses from Issuing Authorities.....	14
Applications for information in terms of the Promotion of Access to Information Act (PAIA).....	16
<b>ELEPHANT POPULATIONS IN SOUTH AFRICA.....</b>	<b>16</b>
Major Localities of Free Ranging Elephants in South Africa .....	17
Elephant Population Management in South Africa .....	19
Translocation .....	19
Culling .....	19
Contraception .....	20
Elephant Range Space .....	21
<b>HUNTING AND OTHER STATISTICS RELATED TO KILLING ELEPHANTS .....</b>	<b>21</b>
Elephant Trophy Hunting in South Africa .....	21
Elephants killed as So-Called “Damage Causing Animals” (DCA) .....	25
Elephants Killed in Terms of “Ecological Management” .....	26
<b>IVORY STOCKPILES .....</b>	<b>27</b>
No Figures for Total Elephant Ivory Stockpile.....	28
Figures Provided by DEAT .....	28

Provincial figures.....	30
Provincial Elephant Ivory Stockpiles .....	32
Elephant Skins (hides).....	34
<b>The Ivory Trade within South Africa .....</b>	<b>34</b>
<b>CAPTIVE ELEPHANTS .....</b>	<b>35</b>
Responses from Provincial Authorities .....	37
Human Deaths and Injuries Attributed to Captive Elephants.....	39
Captive Elephant Deaths .....	39
<b>ANNEXURE A. GOVERNMENT RESPONSES TO ARA RESEARCH .....</b>	<b>40</b>
<b>ANNEXURE B. EXAMPLES AND EXTRACTS OF PROVINCIAL RESPONSES: EASTERN CAPE AND LIMPOPO .....</b>	<b>42</b>

## ACRONYMS

CITES	Convention on Trade in Endangered Flora and Fauna
DCA	“Damage Causing Animals”
DEAT	Department of Environmental Affairs and Tourism
DOA	Department of Agriculture
EKZNW	Ezemvelo KwaZulu Natal Wildlife
ETA	Elephant Tourism Association
KNP	Kruger National Park
NN&S	National Norms and Standards for the Management of Elephants in South Africa
PAIA	Promotion of Access to Information Act
SANBI	South African National Institute for Biodiversity
SANParks	South African National Parks
TOPS	Threatened or Protected Species Regulations

## PREFACE

The implementation of the controversial Department of Environmental Affairs and Tourism (DEAT) legislative policy on elephants, namely the National Norms and Standards on the Management of Elephants in South Africa (NN&S) has been put to the test by Animal Rights Africa, through this two-month investigative report.

ARA attempted to establish from DEAT and provincial conservation officials exactly *how* available and accessible comprehensive information relating to the use of elephants and their management actually is. These include the use of “culling”, the exact quantity of the elephant ivory stockpile held in the country, elephant hunting, the killing of so-called “damage causing animals”, the number of elephants held in captivity and an assessment of the progress of policy on the welfare of elephants in captivity (zoos, circuses and elephant back safaris). Access to this information is therefore crucial to these entities that are playing a watchdog role, holding government to account and representing the elephants’ interests.

The findings of this report reveal alarming trends which appear to fly in the face of open and transparent governance. Moreover, there are unfair and unjustifiable delays in the processing of legitimate public interest requests for government information to which civil society has a right in our democracy.

The legislation authorises culling but states that this must be considered after all other options have been exhausted, i.e. as the last resort. ARA research shows that currently it is impossible to track where and if culling is taking place and therefore the concept of “culling as last resort” cannot be publicly and independently monitored as conservation authorities are not making their intentions regarding culling known widely.

Despite NGO opposition, DEAT shed its responsibility for managing captive elephants by passing welfare issues on to the Department of Agriculture (DOA). Through this Report ARA has now learnt that the DOA is negotiating in bad faith and privileging the elephant exploitation industry to the detriment of the animal protection groups because it has been solely ‘consulting’ with individuals and groups within the captive elephant industry.

The consequence of ARA's findings is that the exploitation and oppression of elephants is continuing unabated in South Africa and it appears that the Minister of Environmental Affairs and Tourism and his department are good at spin doctoring but little else.

**Michele Pickover**  
**ARA Trustee**

## **BACKGROUND**

The National Norms and Standards for the Management of Elephants in South Africa (NN&S) were published by the Department of Environmental Affairs and Tourism (DEAT) on 29 February 2008.

The publication of the NN&S followed years of heated debate and discussion, both nationally and internationally, about the management of both wild and captive elephants in South Africa.

Although the NN&S are directed primarily at the management of free ranging elephant populations they do address some issues related to captive elephants and the Minister of Environmental Affairs and Tourism, Marthinus van Schalkwyk, undertook at the time to ensure that further “Minimum Standards” relating to their management would be published, after consultation with stakeholders, within a year.

Figures relating to the exact quantity of elephant ivory stocks held in the country, elephant hunting, the killing of elephants as so-called “damage causing animals” (DCA) and the number of elephants held in captivity have not been widely examined since the publication of the NN&S. This Report attempts to do so. This Report also explores some of the administrative processes called for by the NN&S and the formulation of the draft Minimum Standards.

As part of this investigation Animal Rights Africa (ARA) also attempted to establish to what degree comprehensive information relating to these issues could be obtained from the government agencies responsible for these issues, namely DEAT and the provincial conservation agencies and officials. This information is important to any independent body or individual, either local or international, wishing to scrutinise the implementation and performance of the NN&S.

## INTRODUCTION

The management of elephants in South Africa has been widely and intensely debated since culling in the Kruger National Park (KNP) was suspended in 1995. The issue has received widespread local and international media coverage and is often used as a gauge of the South African Government's intention and ability to manage and care for the country's wildlife and environment responsibly.

The South African elephant population is the most intensively managed on the continent and has been comprehensively studied by scientists. The NN&S published in February 2008 followed a consultation process during which, Minister van Schalkwyk said at the time, the views of all stakeholders had been considered, if not always adopted. About 80 written submissions were made to DEAT during the consultation process.

Many stakeholders involved in the debate leading up to the publishing of the NN&S are very interested in monitoring the implementation of the NN&S. In order to assess progress these public interest watchdogs need access to a variety of accurate information, information which this report shows is difficult, at times extremely so, to obtain.

At present some information is held by DEAT nationally while other documents and statistics are held by provincial conservation authorities. In many instances provincial authorities were exceedingly slow in providing information, some provided incomplete or vague answers to questions and others refused, for a number of reasons, to release specific details or documents. Official figures provided in Parliament relating to South Africa's ivory stockpiles are also sometimes incomplete and confusing.

DEAT, for example does not have a current figure for South Africa's total elephant ivory stockpile despite South Africa being granted permission by CITES (the Convention on Trade in Endangered Flora and Fauna) to sell 51 tons of ivory to China and Japan in November 2008. CITES prohibited trade in ivory in 1989 but has subsequently allowed a "once off" sale. Botswana, Namibia and Zimbabwe will also sell ivory this year.

Although all provinces, and South African National Parks (SANParks) say that they inform DEAT of annual ivory accumulations (supposedly through confiscations of illegal ivory and from natural mortalities) there is no aggregate figure currently available. Moreover, according to information provided in Parliament DEAT also does not have accurate records of ivory accumulated before 1995.

DEAT (national) also does not keep statistics on the numbers of elephants hunted, destroyed as “damage causing animals” (DCA) or in terms of “ecological management.” (in terms of which individual elephants deemed to be causing irreversible damage to sensitive vegetation are killed). Should DEAT require this information it has to be requested from provincial authorities. Conservation authorities in Limpopo, South Africa’s most popular elephant hunting destination, took six weeks to collate information for this report as, alarmingly, no centralised database is kept and records are maintained manually. Officials in the provincial head office in Polokwane apparently had to contact five district officials in order to provide statistics. This information, when supplied, was still incomplete.

A similar situation exists for data relating to the shooting of “damage causing animals” (DCA) in the Limpopo province, even though the issue of animals breaking out of the KNP is sometime raised as a matter of concern by local communities. What is more, the elephant-human conflict issue is cited by SANParks as an indicator of “too many elephants” yet they appear to have no comprehensive data or statistics or have not collated or documented the reasons and circumstances of such instances.

Although DEAT, in a written response to a question asked in Parliament, said that 27 elephants were hunted in South Africa in 2007, this relates only to those shot by foreign hunters. Figures obtained from provincial authorities show that in the region of 50 elephants were shot by all hunters in 2007. An exact figure for 2007 is difficult to calculate because Limpopo keeps statistics according to the financial year and not a calendar year.

Additionally, while the NN&S standards stipulate that the elephant management plans have to be submitted for all properties, provincial or private, with elephants, in most instances officials say that these documents and permits cannot be disclosed because in doing so they might infringe third party confidentiality. This makes it difficult any independent body or member of the public to subject the implementation of the NN&S to proper scrutiny.

It also appears that provincial authorities are unsure about what information is in the public domain and prefer to deny access to documents rather than releasing them.

DEAT also does not currently have an accurate figure for the number of elephants kept in captivity and keeps no record of worker fatalities, even though at least five handlers/workers have been killed by captive elephants in the past seven years.

Ms Sonja Meintjes, Deputy Director: Biodiversity Compliance at DEAT believes that many of these difficulties listed above may be resolved when the Threatened or Protected Species Regulations (TOPS) regulations are fully implemented. The TOPS regulations, formulated in terms of the National Environmental Management Biodiversity Act, are directed at regulating the keeping, breeding, trade and hunting of threatened and protected species in South Africa.

The NN&S also require that management plans and other information relevant to elephant management be submitted to the South African National Institute for Biodiversity (SANBI) for the development of national and international databases and properly planned monitoring and research programmes. SANBI has not yet initiated these databases as funding, which has been confirmed, is still awaited.

Despite the difficulties experienced in gathering information from some provinces other officials, once they had been authorised to do so, were helpful and were also prepared to explain why they felt they could not divulge specific information.

***Copies of all written responses from provincial authorities are available from ARA.***

## NATIONAL NORMS AND STANDARDS

The NN&S were drawn up to regulate the management of elephants in the wild, captive elephants, the hunting of elephants and a variety of other issues.

The issues addressed when considering the management of wild elephants include the control of population sizes and their distribution, the establishment of new populations, contraception, range manipulation and culling.

The NN&S and standards also authorise the use of culling to control elephant population but state that this must be considered after all other options have been exhausted. They prohibit the capture of free ranging elephants and the importation of elephants for use in the captive elephant industry. Elephants can only be kept in captivity if the animal was permitted to be kept in captivity at the time the NN&S came into effect. An elephant can also be kept in captivity if it was conceived naturally and born in captivity in a controlled environment to captive elephants as per the approved management plan.

## MINIMUM STANDARDS

ARA has learnt that the consultation process followed in compiling the first draft of the Minimum Standards has been restricted to individuals and groups within the captive elephant industry. This is despite public statements by Minister van Schalkwyk that the Minimum Standards would be compiled with input from all interested stakeholders. This is of grave concern.

The draft copy of the Minimum Standards is also expected to recommend that the industry be allowed to regulate itself.

During the consultation process leading to the formulation of the NN&S a number of organisations and individuals, including the ARA, IFAW (International Fund for Animal Welfare), the NSPCA (National Council of SPCAs), Public Watch, internationally renowned elephant scientist Dr Joyce Poole and others said they were opposed to the captive elephant safari industry and presented scientifically and information based evidence, both written and oral, stating that the industry is inherently cruel. They also requested further discussion of the social aspects of elephant behaviour and ethology. **At the**

## **time these stakeholders said they feared their views would be ignored in the draft copy of the Minimum Standards**

In February the Minister announced that DEAT and the Department of Agriculture (DoA) would form a joint task team to work on the formulation of the document and said that that issue of elephant welfare would be dealt with under the Animal Protection Act and the Performance Animal Protection Act (which fall under the jurisdiction of the DoA).

“I am pleased to confirm that the owners of elephants in captivity, elephant scientists, as well as various animal rights /welfare groups are well prepared and very eager to engage in this process and have indeed already put forward a number of proposals in this regard,” Minister van Schalkwyk said in a speech on 25 February, 2008.

Despite this statement Dr Keith Ramsay, Deputy Director: Animal and Agricultural Production at the DoA confirmed in a telephone interview in early October that only people directly involved in the captive elephant industry were being consulted in the drafting of the first version of the Minimum Standards.

“Input was restricted to from those in the industry because if we approached everyone the document would take far too long to get out. This is a really a working document, a set of proposals,” Dr Ramsay said. “The idea is to publish the draft and then invite comment from experts and interested parties. We will send copies of to various interested parties and of course public can comment too.”

Dr Ramsay said that the scientific evidence presented during the formulation of the NN&S was not considered because these views could be presented again after the publication of the draft Minimum Standards. He said that the Elephant Tourism Association, (ETA) had worked closely with his department and trainers, handlers and veterinarians working with elephants had also been consulted.

Approached for comment by ARA on the issue DEAT’s Deputy Director-General of Biodiversity & Conservation Fundisile Mketeni said “the development of the Minimum Standards for Captive Elephants should be a consultative process.”

“The work between Department of Agriculture and Environmental Affairs and Tourism is to draft a discussion document for consultation, Mr Mketeni said. “The consultation and public participation will

take place according to Sections 99 and 100 of the National Environmental Management: Biodiversity Act (NEMBA).”

Those opposed to the industry argue that DEAT is trying to shed its responsibility for managing captive elephants by attempting to pass welfare issues on to the DoA. They also say that DEAT must first establish what constitutes permissible use of captive elephants before appropriate care and welfare can be addressed. Many feel that the elephants already in captivity should be moved to sanctuaries and not forced to interact with people. They also believe that self regulation is impossible or extremely difficult to enforce effectively in an industry driven by profit.

During his speech announcing the NN&S Minister van Schalkwyk said that the Minimum Standards were necessary because his department had received numerous complaints about allegedly cruel and unethical practices within the industry.

“Regarding the approximately 120 elephants that already held in captivity in South Africa, I have committed to developing within 12 months Minimum Standards for their management, potentially including such topics as care, maintenance and permissible uses,” Minister van Schalkwyk said. “Compliance with these standards, which will be drawn up in close consultation with all interested and affected stakeholders, will be a precondition for the approval of management plans for keeping captive elephants and consequently for the permitting of these captive elephant facilities in terms of TOPS.”

Dr Ramsay said that DEAT and the DoA had worked closely on the captive elephant issue and those consulted felt that the industry should be self regulating.

“We believe the industry needs to be self regulating and the ETA is in the ideal position to be involved this way,” Dr Ramsay said. “Neither the DoA or DEAT are in a position to monitor [the industry]. ETA has access to the relevant experts and knowledge.”

The ETA represents many of the captive elephant tourism operations in South Africa. In September the co-coordinator of ETA, Mr Greg Vogt, declined to provide any specific figures for the numbers of elephants in captivity, their location or details about birth and deaths of elephants.

(For more information on the Captive Elephants issue see: p35)

## **MANAGEMENT PLANS FOR FREE RANGING ELEPHANTS**

Elephant management plans have to be drawn up for all properties with free ranging and captive elephants. Plans for provincial reserves and SANParks must be submitted to DEAT but those for elephants on private property need only be submitted to the relevant provincial authorities. Elephant culling plans must be drawn up and submitted through the same channels should culling be contemplated.

These plans will also have to be submitted to SANBI.

DEAT and all provinces were asked if they had received elephant management plans as required by the NN&S. (Most responses were received in late September or early October 2008).

### **Responses from Issuing Authorities**

- **DEAT**

As of 11 September DEAT had received no elephant management plans or culling plans from SANParks or any provincial authority.

- **SANBI**

SANBI is still setting up systems to handle information relating to the NN&S.

- **Eastern Cape**

The Department of Economic Development and Environmental Affairs (DEDEA) responded in writing with a N/A when asked if they had copies of elephant management plans or elephant culling plans for reserves with elephants in the province. It is not clear what N/A means in this instance as the NN&S stipulate that management plans must be submitted to the province in the case of private reserves. There are several private reserves with elephants in the Eastern Cape. The Eastern Cape Parks authority manages 13 reserves but only the Great Fish River Nature Reserve has elephants (2). This reserve has a management plan. The Addo Elephant National Park is also situated in the province but reports to SANParks (and thus DEAT).

- **Free State**

No free ranging elephants.

- **Gauteng**

No free ranging elephants.

- **KwaZulu-Natal**

All Ezemvelo KwaZulu Natal Wildlife (EKZNW) protected areas with elephants have draft management plans. "These are currently in the process of being adopted internally and as such are not public documents as yet. You may need to contact the private reserve yourself in order to request their management plans. Can provide contact details if required." Mr Rob Blok, Chairman of the EKZNW Elephant Management Working Group said. Mr Blok said that that no culling plans had yet been submitted in terms of the NN&S because "there has been no need to as yet".

- **Limpopo**

The relevant official did not make it clear if any management plans had been received by the Department of Economic Development, Tourism Environment. No culling plans had been received.

- **Mpumalanga**

In a written response to question Mpumalanga Tourism and Parks Agency (MTPA) said they "Have management plans for the two provincial reserves with elephant. Have management plans for two smaller private reserves. For the larger reserves +/- 220000ha open with KNP have joint management plans and protocols with KNP. Management plans are the property of the owners and can only be disclosed on their approval."

The Agency has received culling plans from provincial or private reserves, they did not specify but added again that "Management plans are the property of the owners and can only be disclosed on their approval."

- **North West**

Elephant management plans are required for all reserves with elephants. North West Parks and Tourism Board are finalising elephant management plans for Madikwe Game Reserve and Pilanesberg National Park.

- **Northern Cape**  
No free ranging elephants.
  
- **Western Cape**  
No free ranging elephants.

## **Applications for information in terms of the Promotion of Access to Information Act (PAIA)**

Through lawyers ARA has made several attempts in terms of PAIA to obtain copies of the elephant management and culling plans which are required by the NN&S.

Few responses were received and in at least one case the application was vehemently criticised as being aggressive and threatening. In some cases it officials were not clear should be approached and how the application could be followed up. Some officials said the matter should be referred to the DEAT national office.

## **ELEPHANT POPULATIONS IN SOUTH AFRICA**

According to the South African National Parks, in 2007 South Africa had approximately 17 840 free ranging elephants and this represents about 3.8% of Africa's total population of about 490 000. South African elephants occur on about 80 properties including national and provincial parks and on private land. All properties with elephants are fenced, a situation unique to South Africa. Southern Africa as a region also accounts for just under 60% of the continent's elephant population.

The only publicly available aggregated elephant population figures appear in the IUCN African Elephant Status Report 2007. See table below.<sup>1</sup>

<b>COUNTRY</b>	<b>2007 REPORT</b>	<b>2002 REPORT</b>
Angola	818	36
Botswana	133 829	100 629
Malawi	185	647
Mozambique	14 079	11 647
Namibia	12 531	7 769
<b>South Africa</b>	<b>17 840</b>	<b>14 071</b>
Swaziland	31	39
Zambia	16 562	12 457
Zimbabwe	84 416	81 555

## **Major Localities of Free Ranging Elephants in South Africa**

There are no free ranging elephants in Free State, Gauteng, Northern Cape and Western Cape. Some reserves have elephants that are not used for elephant back safaris or walks but are also not considered free ranging. (Generally free ranging elephants are those that do not require supplementary feeding, housing or other human assistance).

To provide a general idea of where most of South Africa's larger elephant populations occur, the table below lists some of the larger elephant populations in South Africa. All figures in the table are either from 2006 or 2005 elephant population counts and were drawn from the IUCN African Elephant Status Report 2007. Currently the IUCN figures appear to be the only aggregated dataset available.

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<sup>1</sup> <http://data.iucn.org/dbtw-wpd/edocs/SSC-OP-033.pdf>

LOCATION	RESERVES	POPULATION
<b>Kruger National Park - KNP (2006)</b>		<b>12 427</b>
Private reserves that share unfenced boundaries (and therefore elephants) with the Kruger National Park. These include: Timbavati, Klaserie, Umbabat and Sabi Sands		2 800 (approximately)
Mpumalanga (excluding KNP and neighbouring private reserves)	Songimvelo	60
	Mthethomusha (borders on KNP)	30
Limpopo (excluding Kruger National Park and neighbouring private reserves)	Welgevonden	100
	Selati Game Reserve	85
	Marakele National Park	110
	Atherson Nature Reserve	60
	Venetia	61
KwaZulu-Natal	Hluhluwe iMfolozi Park	346
	Tembe Elephant Park	167
	Ithala Game Reserve	84
	iSmangaliso Wetland Park (St Lucia)	45
	uMkhuze Game Reserve	37
	Pongola Nature Reserve	55
Eastern Cape	Addo Elephant National Park	459
	Kwandwe Private Game Reserve	29
	Shamwari Private Game Reserve	61
North West	Madikwe Game Reserve (2008)	550
	Pilanesberg National Park (2008)	140

## **Elephant Population Management in South Africa**

The NN&S listed a number of ways of managing elephant numbers in South Africa. These include:

### **Translocation**

The first translocation of elephants to wild (although fenced) areas in South Africa took place in 1979 but the first adult bulls were only relocated in 1998 because their size necessitated the construction of specialised crates and trucks.

By 2002 more than 800 elephants had been relocated from the KNP.

In 1993 some 200 female elephants and their young were translocated from the Gonarezhou National Park in Zimbabwe to the Madikwe Game Reserve in North West province.

Some elephants have also been translocated to wild areas outside South Africa including Mozambique and Angola. In September this year it was reported that about 150 elephants from private reserves bordering the KNP are to be translocated to a reserve in Northern Zambia in 2009.

A number of elephants from the KNP have also been sold to zoos in the U.S.A. and elsewhere.

### **Culling**

Culling was initiated in the KNP in 1967 and a total of 14 562 elephants were killed between that year and 1994 when culling was suspended. The highest number of elephants culled in any year was 1846 in 1970.

The current NN&S, published on 1 May 2008, have again allowed culling as a method to reduce elephant populations. The NN&S stipulate that culling must only be considered as a last resort after translocation, contraception and creating more conservation areas for the animals has been considered. Before any culling takes place, culling plans, signed by a registered ecologist, must be submitted to relevant authorities for approval. As at the time of writing no culling plans had been submitted to DEAT national.

Mpumalanga Tourism and Parks Agency (MTPA) confirmed that they had received culling plans but did not specify to which parks/reserves these applied.

Extensive culling of elephants also took place in Zambia in the late 1960s and in Zimbabwe (then called Rhodesia) from 1966 where some 50 000 elephants were culled over a 30 year period.

## **Contraception**

Techniques used for elephant contraception have advanced considerably in the past eight years. Scientists and veterinary experts have shown that the use of the pZP vaccine is effective in relatively small contained female elephant populations. The vaccine needs to be administered two to three times in the first year followed with an annual booster. The animal need not be captured or sedated and the vaccine is delivered by a dart gun.

Female elephants have been treated with the vaccine at the following reserves. The date reflects the start of the contraception programme at that location:

Makalali Game Reserve (June 2000).

Mabula Game Reserve (May 2002).

Thabo Tholo (August 2004).

Shambala Game Reserve (June 2004).

Phinda Private Game Reserve (July 2004).

ThornyBush (May 2005).

Welgevonden Private Game Reserve (Sept 2006).

Kaingo Private Reserve (Oct 2005).

Karongwe Private Game Reserve (May 2007).

Tembe Elephant Park (May 2007).

A one-shot contraceptive (GnRH) is also being researched but has not been widely used to date. Elephant vasectomies have also been undertaken by are expensive and time consuming.

Contraception of elephants does not reduce populations but limits population growth. The effects of birth control on the social and age structures of elephant populations is still being researched.

## Elephant Range Space

The creation of the Greater Limpopo Transfrontier Park (which includes the KNP), the Limpopo Shashe Transfrontier Park and the Lubombo Transfrontier Conservation and Resource Area (still under development), although not intended solely for the protection of elephants, do offer some opportunity for the animals cross international boundaries in search of new range.

## HUNTING AND OTHER STATISTICS RELATED TO KILLING ELEPHANTS

Southern Africa, including South Africa, is the largest destination for elephant hunters in Africa and most countries in the region have been awarded annual CITES quotas to export elephant trophies.

South Africa's 2008 CITES quota allows the export 200 tusks (as hunting trophies from 100 animals) and Zimbabwe's quota of 1000 tusks (500 elephant trophies), is the largest of any African country. Elsewhere in Africa only Tanzania has a significant CITES quota to export elephant trophies.

CITES quotas are required by international agreement before any elephant trophy can be exported but the full quota is not always utilised.

COUNTRY	TUSK EXPORT QUOTA	TOTAL ANIMALS
Botswana	660	330
Mozambique	80	40
Namibia	180	90
<b>South Africa</b>	<b>200</b>	<b>100</b>
Tanzania	400	200
Zambia	40	20
Zimbabwe	1000	500

## Elephant Trophy Hunting in South Africa

DEAT head office does not keep an updated record of the numbers of elephants hunted in South Africa. All figures have to be requested from provincial authorities.

Limpopo province, the premier elephant hunting destination in the country, also does not have a central database of the numbers of elephants hunted and officials in Polokwane have to approach five district officials for information.

This cumbersome process makes gathering accurate information difficult.

Ms Sonja Meintjes Deputy Director: Biodiversity Compliance at DEAT said in an interview that “DEAT can only provide information on CITES permits issued for export of hunting trophies for elephants. We do not get information from provinces on how many animals were hunted unless we specifically request that information from them.” Ms Meintjes said that once TOPS is fully implemented the information will be more easily available.”

In a written response to a question submitted in Parliament by Mr Gareth Morgan of the Democratic Alliance (Parliamentary question no. 1442 on 22 August 2008) DEAT said that 27 elephants were hunted in South Africa during 2007. These relate to animals shot by foreign hunters only.

<b>PROVINCE</b>	<b>TOTAL</b>
KwaZulu Natal	4
Limpopo	12
Mpumalanga	6
North West	5

Figures of elephants trophy hunted in 2007.obtained for purposes of this Report from the Provinces reveal inconsistencies:

<b>PROVINCE</b>	<b>TOTAL</b>
KwaZulu Natal	7
Limpopo	28 (between April 2007 and March 2008)
	22 (between April 2006 and March 2007)
Mpumalanga	14 (3 in provincial reserves and 11 on private land).
North West	5 (2 in provincial reserves and 3 on private land).

The actual total number of elephants killed by trophy hunters in 2007 is difficult to ascertain given the variability in record keeping systems but may be in the region of 50. There are no free ranging elephants in Free State, Gauteng, Northern Cape or the Western Cape and elephant hunting does not take place in these provinces. It is illegal to hunt non free-ranging elephants.

The table below shows the statistics on trophy hunting supplied by the provinces.

PROVINCE	YEAR	TOTAL
Eastern Cape		No figures provided
KwaZulu Natal	2004	4
	2005	14
	2006	10
	2007	7
	2008 (January – September)	8
Limpopo	April 2007 – March 2008	28
	2007 April 2006 – March	22
Mpumalanga (Provincial reserves)	2003	1
	2004	1
	2005	2
	2006	2
	2007	3
Mpumalanga (Private Reserves)	2003	2
	2004	6
	2005	9
	2006	4
	2007	11
North West (Madikwe and Pilanesberg)	2002	2
	2003	4
	2004	5
	2005	5
	2006	2
North West <sup>2</sup>	2007	2
	2004	4
	2005	3
	2006	3
	2007	3

<sup>2</sup> Parks reporting to the Department of Agriculture, Conservation & Environment

## Elephants killed as So-Called “Damage Causing Animals” (DCA)

Elephants that break out of reserves are sometimes shot on the grounds that they may endanger human life or damage crops and property. Before opting to shoot the animals officials are usually expected to attempt to return them to the protected area from which they originated. Some elephants are also shot as DCA within protected areas when authorities feel they are a danger to people or property.

As with hunting statistics Ms Meintjes said that “DEAT has to request this information from the provinces as DEAT does not keep data on how many animals are destroyed as damage causing animals.” Data obtained from the various provinces were as follows:

- **Eastern Cape**

2001/02: 1

- **KwaZulu-Natal** (It is not clear over what time period the animals listed below were shot).

Inside protected areas: 24

Outside protected areas: 9

Incursions from neighbouring countries: 3 entering a community area from Mozambique

- **Limpopo**

Although specific figures were not available as at the time of writing up this Report, the Limpopo official estimated that on average 20 elephants a year are killed as DCAs. The difficulty in establishing accurate figures, according to officials, is due to the decentralised manual record keeping system and the high turnover of staff in outlying districts.

- **Mpumalanga**

2000: 28

2001: 22

2002: 4

2003: 11

2004: 8

2005: 27

2006: 11

2007: 22

- **North West** (North West Parks Board)

2003: 1 elephant was shot in 2003 for repeatedly entering accommodation areas.

## **Elephants Killed in Terms of “Ecological Management”**

According to the responses received from officials killing an elephant in terms of “ecological management” takes place when an individual animal is deemed by officials or managers to be damaging sensitive vegetation (such as big trees) beyond acceptable levels. Essentially there is no difference between killing animals as part of a culling programme and “ecological management” except in scale. Culling is apparently aimed at reducing populations significantly to prevent permanent damage to biodiversity.

DEAT does not keep a record on elephants killed in terms of ecological management. (Not applicable to Free State, Gauteng, Northern Cape and Western Cape).

- **Eastern Cape**

0

- **KwaZulu-Natal**

0

- **Limpopo**

Although the relevant official in the province initially answered that 21 elephants were killed in terms of ecological management he did not specify for which year this figure applies.

- **Mpumalanga**

2000: 0

2001: 0

2002: 0

2003: 0

2004: 3

2005: 0

2006: 0

2007: 11

- **North West**

0

## **IVORY STOCKPILES**

In July CITES approved once off ivory sales by South Africa and other Southern African countries. The applications had been made at earlier meetings but were only approved in July 2008.

The following quantities of raw ivory have been approved: South Africa 51 121.8 kilograms, Botswana: 43 682.91 kilograms, Namibia: 9 209.68 kilograms, and Zimbabwe: 3 755.55 kilograms, a total of 107 769.94 kilograms/ 9107.7 tons).

South Africa will sell its quota to Japan and China but in response to a question in Parliament (Written reply to question 1217, 1 August 2008) DEAT said it did not know how much revenue was expected from the sale of the ivory. DEAT said the sales would be from SANParks, KZN-Wildlife, Mpumalanga Tourism and Parks Agency and North West Parks and Tourism Board stockpiles.

According to DEAT the money accrued from the sales will “be used exclusively for elephant conservation and community conservation and development programmes within or adjacent to the elephant range.” The use of the money will, according to DEAT, be audited in terms of the Public Finance Management Act and Treasury regulations.

The sale of stockpiled ivory has engendered considerable debate and opposition worldwide and many, including conservation authorities in Kenya, Mali and elsewhere say that the sales may fuel an increase in poaching.

The United Kingdom based Environmental Investigation Agency(EIA) claimed in a report published in July 2008 that Chinese authorities admitted in a secret document that they were unable to account for some 110 tons of ivory, the equivalent of the tusk of 11 000 elephants.

“China’s secret document on the missing 110 tons of ivory confirms the extent of its massive illegal ivory trade and underlines why it must not be allowed to legally trade ivory,” the EIA said in a report

published in July. "It is already the world's largest importer of illegal ivory which is already fuelling poaching across Africa, wiping out elephant populations. Chinese nationals have been implicated in illegal ivory trade in 23 African nations."

The EIA said that document was written by a senior Chinese official and admitted that "We have not been able to account for the [ivory] shortfall through the sale of legal ivory by the selected selling sites in the country. This suggests a large amount of illegal sale of the ivory stockpile has taken place".

A DEAT delegation visited both China and Japan between 22 September and 2 October 2008 and said in a press release that South Africa was satisfied that both countries had strict controls in place to limit illegal ivory trade.

## **No Figures for Total Elephant Ivory Stockpile**

### **Figures Provided by DEAT**

Despite the intense international debate about the sale of ivory stockpiles DEAT were, as of 11 September 2008, unable to say exactly how much ivory was held in stockpiles in South Africa. Figures in the public domain are also confusing and disjointed.

"DEAT does not have the latest figures for the total ivory stock in South Africa at present as some of the provinces will sell its legal stocks to the Chinese and Japanese and they will not know what stocks are left until after the sale. DEAT normally get figures at the end of January each year when we need to supply this information to the CITES Secretariat, Ms Meintjes said in an interview in September. "

CITES figures do not show the total amount of ivory held in South African stockpiles.

The publicly available figures are confusing and it is difficult to work out exactly how much ivory is stockpiled. Answers provide by DEAT to Parliament are also confusing.

Mr Sayedali-Shah (DA) on 18 May 2008, (Parliamentary question 671) asked: What is the total tonnage of South Africa's (i) ivory and (ii) elephant hide stockpile and (b) what is the annual cost of protecting and storing this (i) ivory and (ii) elephant hide stockpile?

DEAT replied:

“i) the ivory stocks accrued from 2006 to date are 68 339.77 kilograms (excluding Western Cape, Eastern Cape and North West). The total government owned stock in 2000 was 37070.16 kilograms and the total amount of ivory which was privately owned in 2000 was 64593.78 kilograms.”

ii) Only Kruger National park had a significant stockpile of elephant hides which were sold in 2004/05. The total stockpile of elephant hide is 953 kilograms in pieces.

iii. Ivory stocks and hides are kept in safes by the different conservation authorities and it is difficult to determine what the cost is to keep these stocks safe.”

In answer to another Parliamentary question (Question (950, 6 June 2008) by Mr Gareth Morgan (DA) DEAT said that they did not have figures showing how much ivory had been stockpiled prior to 1995 (the first year after culling was suspended in the KNP). International ivory sales were prohibited by CITES in 1989.

“DEAT did not keep records of ivory stockpiles for South Africa before the new political dispensation in 1994 as it only had to deal with four provinces and information on stockpiles up to 1995 is thus not available. The four old provinces kept records of ivory stockpiles in hand written ivory registers. Some of these have been computerised,” DEAT responded.

This seems to indicate some gaps in stockpile data.

In a press release distributed on 15 October 2008 DEAT said that some 45% of the ivory being sold to China and Japan “was obtained before 1994 when culling was still practiced in the Kruger National Park and thus the rest of the ivory from 1995 to end 2006 was from mortalities and breakages.”

## Provincial figures

Currently each province is required to supply annual figures for further ivory collected that year from natural mortalities hunting and other sources.

The following figures were submitted to DEAT national for the three years from 1 February 2004 – January 2007. These are included to give the reader an indication of the quantity of elephant ivory gathered from various sources annually.

South African ivory stock: 1 February 2006 – 1 January 2007.

LOCATION	GOVERNMENT OWNED	PRIVATELY OWNED
Eastern Cape	n/a	n/a
Free State	4	None registered
Gauteng	None registered	127.3
KwaZulu-Natal	196.81	624.162
Limpopo	66.05	381.92
Mpumalanga	107.35	None registered
Northern Cape	75.24	None registered
North West	58.1	None registered
Western Cape	n/a	n/a
SANParks	3481.55	None registered
<b>TOTAL</b>	<b>3 985.1</b>	<b>1133.382</b>

South African ivory stocks: 1 February 2005 – 1 January 2006.

<b>LOCATION</b>	<b>GOVERNMENT OWNED</b>	<b>PRIVATELY OWNED</b>
Eastern Cape	n/a	n/a
Free State	18.09	Not registered
Gauteng	36.3	157.6
KwaZulu Natal	92.899	571.57
Limpopo	26.7	286.23
Mpumalanga	342.56	Not registered
Northern Cape	n/a	n/a
North West	n/a	n/a
Western Cape	Not registered	22.8
SANParks	2 087.62	-
<b>TOTAL</b>	<b>2 604.159</b>	<b>1038.2</b>

South African ivory stocks: 1 February 2004 – 31 January 2005.

<b>Institution</b>	<b>Government Owned</b>	<b>Privately owned</b>
Eastern Cape	27.733	None registered
Free State	19.243	None registered
Gauteng	378.6	None registered
KwaZulu-Natal	1 697.078	None registered
Limpopo	635.45	653.45
Mpumalanga	197.11	336.92
Northern Cape	None registered	6.65
North West	None registered	206.65
Western Cape	n/a	n/a
SANParks	1 956.8	-
<b>Total</b>	<b>4 912.014</b>	<b>1203.67</b>

## Provincial Elephant Ivory Stockpiles

As part of this report authorities in each province were approached (in most cases in writing) and they provided the following responses to a question about the quantity of ivory held:

- **Eastern Cape**

None (although the annual submission to DEAT in 1 Feb 2004 – 1 January 2005 indicated 27.733 kilograms of ivory was held. It is not clear what has happened to this ivory).

- **KwaZulu-Natal – (EKZNW)**

280 pieces (approximately 2800 kilograms.)

- **Free State**

The current stockpile of Free State Department of Tourism, Environmental and Economic Affairs is 677.688 kilograms.

- **Gauteng**

The province does hold ivory but refuses to disclose the amount for “security reasons”

- **Limpopo**

“The province is in not in a position to divulge this information,” Senior Manger Wildlife Trade and Regulation Mr Sam Makhubele said in a written response.

- **Mpumalanga**

“The province has 3296.62 kilograms of ivory from it stockpile for sale through CITES approved channels.” (This is part of the sale to China and Japan. A further undisclosed amount is not for sale.)

- **North West**

North West Parks and Tourism Board do hold ivory but did not disclose the figure. The Department of Agriculture, Conservation and Environment provided no figures.

- **Northern Cape**

Although the province has some ivory stockpile a spokesman for the department of Tourism Environment and Conservation did not respond to further queries regarding the amount.

- **Western Cape**

Approximately three tons of ivory stock is held by CapeNature.

- **SANParks**

A SANParks spokesperson said their stockpile comprised of 45 tons of ivory (which is currently is up for sale), and about “six tons (rough estimate) of ivory which is a mixture of confiscated ivory, ivory from named animals, some pieces that are not good for selling for various reasons and approximately 2,8 tons of ivory collected since 2007”.

According to figures supplied in Parliament SANParks reported the following amounts of ivory had been stockpiled since 1 January 2000. These figures were supplied by DEAT in answer to a written question asked by Mr G A Morgan of the Democratic Alliance (Parliamentary question number 671 on 1 June 2007). These figures represent the annual intake.

<b>YEAR</b>	<b>ANNUAL INTAKE</b>
2007	1 211.0 kilograms
2006	3 481. 6
2005	2 087.6
2004	2 427.0
2003	1 956.8
2002	1 555.6
2001	2 612.9
2000	1 959.5
<b>Total</b>	<b>17 292 kilograms</b>

## Elephant Skins (hides)

In 1999 the KNP had 152 099.9 kilograms of elephant hides stockpiled at Skukuza. These were sold for the manufacture of elephant leather fashion goods.

## The Ivory Trade within South Africa

Trade in ivory is legal within South Africa. The ivory is generally used to make ornaments or jewellery. CITES permits are required for any ivory or ivory product that is exported.

- **Eastern Cape** – the province responded that [a] “Register not available”.
- **Free State** – a register is kept but trade levels are extremely low.
- **Gauteng**  
“The ivory in our custody is for safekeeping as confiscated ivory. This ivory cannot be sold. Traders need permits and a register is kept,” the province responded.
- **KwaZulu-Natal**  
“The province keeps a register. No ivory sales as yet. Permits are required to sell ivory but no records need to be kept regarding its origins,” the province responded.
- **Limpopo**  
The Dept of Economic Development, Environment has not sold any ivory but a register would be kept. Those trading in ivory locally would need to be registered in terms of TOPS.
- **Mpumalanga**  
The province keeps a register and submits figures to DEAT national annually. In 2004 – 152.22 kilograms of ivory were sold, in 2005 – 15.46 and in 2006 - 53.07 kilograms. No ivory was sold locally before 2004.
- **North West**  
Traders are required to be registered in terms of TOPS regulations.

- **Northern Cape**

No ivory trade but traders would be expected to register in terms of TOPS.

- **Western Cape**

CapeNature does keep a register but to date has not traded in any ivory stocks. At present permits are not required to possess ivory although the owner must be able to prove its legal origin. This will change after TOPS is implemented.

## **CAPTIVE ELEPHANTS**

In March 2007 there were at least 120 elephants in captivity in South Africa. These include animals used in the elephant back safari industry, animals which are allowed to interact with people by being fed, touched or walking alongside them, those kept in zoos and circus elephants.

It is not clear how many elephant are currently in captivity in South Africa. DEAT at present has no accurate figures, Mr Greg Vogt of the Elephant Tourism Association refused to divulge figures for this report and provincial conservation officials declined to release permit information on the grounds that the details of the permits and management plans are confidential and the property of the elephant owners.

Contacted for information about the number of elephants in captivity, their location and other related issues Mr Vogt said in writing: "As you will know, regardless of the fact that the provincial conservation authorities differ in many respects, all the information you have requested is required to be submitted to said authorities. That said, certain provincial authorities have not received the delegation powers from their MECs (Member of the Executive Council) to implement the TOPS regulations."

He added that "ETA members will have completed their applications in terms of these regulations and will have submitted them to the authorities. In the instances where delegation powers have not been received by the MECs, you will find that these applications will not have been processed."

In his written response to question about the number of elephants Mr Vogt added:

"In terms of our membership:

1. There have been a number of births in the last three years.

2. There have been a number of elephants moved from one facility to the other.
3. There have been reports of rhino killing elephant.
4. In certain instances there have been applications to move certain captive elephants to particular wild operations.

As per regulations all these reports will be obtainable in each of the management plans submitted to the authorities.”

Mr Vogt has been working closely with the DoA on the drafting of the MS.

While some officials, notably those from Mpumalanga Tourism and Parks Authority (MPTA) Ezemvelo KwaZulu Natal Wildlife (EKZNW) gave details of captive elephants their provinces others said they could not do so on grounds of confidentiality Some provided no reason for not providing details.

Ms Sonja Meintjes at DEAT said she did not have a current figure for the number elephants held in captivity in South Africa.

“This information will become available to DEAT as soon as all provinces are implementing the Threatened or Protected Species (TOPS) Regulations in terms of which owners must register as a commercial exhibition facility.”

The Western Cape and Mpumalanga have not implemented TOPS because legal technicalities are still being resolved. As noted, Mpumalanga provided information.

Most elephant back safari/elephant interaction operators have websites and some publicise details of their animals including births. It is difficult independently verify these figures.

The NN&S prohibits both the capture of free ranging elephants for use in the industry and the importation of animals for this purpose. The NN&S also require that a register of all animals stating their origins and age be kept but did not stipulate exactly at what date this should begin. The animals must be micro-chipped and an identikit of each animal must be maintained.

Although five handlers/workers have been killed by captive elephants in the past seven years DEAT does not keep a list of deaths or injuries in the industry. (See page 39)

## Responses from Provincial Authorities

- **Eastern Cape**

The Department of Economic Development and Environmental Affairs (DEDEA) said in a written response that two permits had been issued to keep captive elephants in the province. They provided no further information. It is unclear to which operations these refer and how many elephants are kept in terms of the permits.

At least three operations, The Elephant Sanctuary, Inkwenkwezi Private Game Reserve and Addo Elephant Safaris advertise elephant back safaris/interactions, Kwantu Game Reserve has elephants that were translocated from Mabilingwe Game Reserve for use in elephant back safaris or human/elephant interactions and fifth, Elephants of Eden, with 10 elephants, is reported to be a sanctuary where some animals are fed.

DEDEA also said it had no report of people being killed by captive elephants in the province but in early September both the Daily Dispatch newspaper in East London and the Eastern Province Herald in Port Elizabeth reported that a Zimbabwean born worker, Vanhuvmnwe Chinangama, was killed by an elephant at Elephants of Eden near Woody Cape.

DEADEA added that no captive elephants had died in the province in the last five years but it is known that one elephant translocated to Kwantu Game Reserve died of pneumonia in early 2006.

- **Free State**

No captive elephants except for two in the Bloemfontein Zoo.

- **Gauteng**

No captive elephants except for one at the Johannesburg Zoo.

In 2007 two elephants were kept on the Dinokeng property at Hammanskraal but these have since been relocated.

- **KwaZulu Natal**

14 elephants in captivity - (10 African – 4 Asian) Natal Zoological Garden Boswell Zoo – and some are used for circus work. “No human injuries or deaths have been reported. EKZNW is following up on requirements as per the National Norms and Standards prescript” EKZNW reported.

- **Limpopo**

Permits issued for four properties to keep captive elephants. Asked on which properties these elephants were kept the Department of Economic Development, Environment and Tourism province responded that “this information is regarded as “third party” information and can only be divulged with the written permission of such parties.”

EFAF at Mooketsi, Shambala Game Reserve and Camp Jabulani at Kapama Game Reserve all offer elephant safari/interactions.

- **Mpumalanga**

They have issued three permits. Properties with elephants include KwaMadwala – 2 (1 bull and 1 cow); The Elephant Sanctuary – 2 (both bulls); and Elephant Whispers – 7 (6 bulls and 1 cow). No human deaths have been reported. “Management plans are the property of the owners and can only be disclosed on their approval),” the MPTA stated.

- **North West**

There are several captive elephant operations in North West. These include Wild Horizon Elephant Safaris, the Elephant Sanctuary and Glen Afric. Another company, Mziki, has applied for permits.

- **Northern Cape**

No captive elephants.

- **Western Cape**

“There are between 35 – 40 elephants in private possession in the Western Cape Province at various localities (i.e. game farms, elephant parks etc.),” Deon Hignett, Manager Flora Fauna CITES and hunting at CapeNature said. “I suggest that you contact the Elephant Managers and Owners Association (EMOA) and / or the ETA for further specific details on elephants kept in captivity.” He added that captive elephant management plans “are private and I cannot

divulge the contents thereof to you without permission from the owner / author of the document.”

## **Human Deaths and Injuries Attributed to Captive Elephants**

At least five handlers/workers have been killed by captive elephants in the last six years and several people, including tourists have been injured.

DEAT keeps no record of handlers or others killed or injured by captive elephants.

### **Media Reported deaths (all elephant handlers or other staff members):**

- September 2008 – Zimbabwean born Vanhuvnmwe Chinangama was killed by an elephant at Elephants of Eden, Woody Cape near Port Elizabeth. News reports described Elephants of Eden is described as a “sanctuary”.
- 19 December 2006 – A Zimbabwean handler/minder Bizwerk Mojo was killed by an elephant at the EFAF (Elephants for Africa Forever) centre at Mooketsi near Tzaneen. (In November 2005, William Andrew a British student at the EFAF Mooketsi centre was trampled and injured by an elephant.)
- 6 March 2006 – A Zimbabwean handler Edias Makore was killed by an elephant at Camp Jabulani in the Kapama Game Reserve near Hoedspruit.
- 
- June 2005 – A Zimbabwean handler Tobias Ndhlovu was killed by an elephant at the Knysna Elephant Park.
- April 2001 – A Zimbabwean handler, Fiso Mbambo, was killed by a captive elephant used in the making a film near Hartebeespoort Dam

## **Captive Elephant Deaths**

At least three elephants have died in captivity since 1 January, 2005.

- Garden Route Game Lodge – an elephant was killed by a rhino in late 2006.
- Kwantu Game Reserve – one elephant captured in Mabilingwe died of pneumonia in May 2006.
- EFAF, Mooketsi - an elephant was shot after it became “uncontrollable” in January 2005.

## **ANNEXURE A. GOVERNMENT RESPONSES TO ARA RESEARCH**

In most cases provincial media liaison representatives were contacted first. This was done to ensure that the appropriate official was designated to provide the information and, where necessary, granted the necessary authority to speak to the media.

The process of getting authorisation to deal with the media in some cases slowed down response times.

Although the Free State, Gauteng, Northern Cape and Western Cape have no free ranging elephants they were asked questions relating to captive elephants and ivory stockpiles.

- **DEAT**

Setting up an interview took three weeks but the relevant official was helpful and provided as much information as she had at her disposal.

- **Eastern Cape**

Took six weeks to provide brief and in some cases incomplete and inaccurate, information. First communication was on 27 August – received on 8 October.

- **Gauteng**

Responded very quickly but refused to divulge ivory stockpile figures for “security reasons”.

- **Free State**

Responded immediately on the telephone.

- **KwaZulu-Natal (EKZNW)**

Took just over three weeks to provide answers. The relevant official was helpful and informative once he had been asked to handle the request. Media liaison official repeatedly apologised for the delay.

- **Limpopo**

Although the first set of answers were provided after four weeks the answers were vague and incomplete and another two weeks were needed to get further, but limited clarity. First communication was on 5 September and the final response was received on 15 October

despite written commitment to provide the information as early as 19 September and again on 26 September. Another official, designated on 13 October to provide clarity, was extremely helpful given the limited time at his disposal.

- **Mpumalanga:** (Tourism and Parks Agency)

Although it took 3 weeks to get approval to release the information the relevant official then responded quickly and comprehensively. Although not willing to disclose management plans he was prepared to explain the reasons for this decision.

- **North West.** (Department of Agriculture Economic Affairs and Tourism)

Although they agreed that the information requested was in the public domain, they initially insisted on a written agreement regulating how the information could be used. ARA protested on the grounds that the information is in the public domain and should be released.

- **Northern Cape**

No free ranging or captive elephants.

- **Western Cape** (CapeNature)

Responded quickly but would not disclose management plans. Official was helpful and willing to discuss the matter at length.

## **ANNEXURE B. EXAMPLES AND EXTRACTS OF PROVINCIAL RESPONSES: EASTERN CAPE AND LIMPOPO**

Although these are extreme examples it illustrates the difficulty of gathering information necessary for a proper review of the implementation of the NN&S. An example for Limpopo province is also included.

### **Eastern Cape**

The relevant official took six weeks to provide a response and then provided extremely sparse information: see below.

The official, a Manager: Biodiversity Conservation Management was contacted on 27 August but referred the matter to her Chief Director who in turn, one week later referred the matter back to her.

Thereafter it required at least 11 telephone calls to her cell phone (most of which were unanswered, five telephone calls to her office and at least 11 e-mails which – most without reply – to obtain a response. . On 15 September the official promised, in writing, a response by the end of the week (19<sup>th</sup> September) but on 3 October sent an e-mail saying the information could not be released as the correct procedure had been followed, this despite the researcher following to the letter her request to contact her Chief Director. Only after being requested to release the information by a senior official in Pretoria was a response received. On 8 October, 43 days after the initial request the following e-mail was received and is reprinted verbatim. This is an extreme example of the difficulties experienced in gathering conservation information.

*Question:* How many elephants were hunted in your province in the last year? Can you provide figures for the past five years?

*Answer:*       None

*Question:* How many elephants were destroyed as damage causing animals last year (Also by year dating back as far as 2000 as possible?)

*Answer:*       One, between 2001-2002.

*Question:* How many elephants were destroyed in terms of ecological management last year (And by year dating back to 2000 if possible)?

*Answer:* None

*Question:* How does destroying an animal in terms of ecological management differ from culling?

*Answer:* N/A

*Question:* On 8 June 2008 the Acting Director General of DEAT Nosipho Jezile said in a written reply to a question from the Democratic Alliance's Mr G Morgan (Parliamentary Question 950) that "(b) Provincial conservation authorities with ivory stockpiles and the South African National Parks (SANParks) sell ivory in accordance with their Provincial Ordinances and the Protected Areas Act and no record is kept of these sales at national level. Ivory can be traded within South Africa for commercial or non commercial purposes." Does your province keep a register of ivory sales? If so can you provide sales figures?

*Answer:* No, register not available

*Question:* What quantity of elephant ivory is held in stockpiles by your province?

*Answer:* None

*Question:* How many permits for captive elephants have been issued in your province? On which properties are the elephants held and can you give a breakdown of numbers by property?

*Answer:* Two.

*Question:* Have the owners of captive elephants in your province provided you with management plans and a register of the elephants they keep. Is it possible to obtain copies of these plans?

*Answer:* Yes management plans have been submitted. No

*Question:* Has anyone been killed by captive elephants in your province in the last five years? If so on what property and when?

*Answer:* No report

*Question:* Have any captive elephants died in your province in the last five years and where did these deaths take place?

*Answer:* No

*Question:* From which reserves (provincial or private) has your department received elephant management plans? Is it possible for me to obtain copies of these plans?

*Answer:* N/A

*Question:* Have any reserves (provincial or private) submitted elephant culling plans? If so is it possible to obtain copies of these plans?

*Answer:* N/A

## **Limpopo**

The relevant official, a Senior Manager was first contacted on 5 September. He initially said in writing that a response would be provided “as soon as possible”. He later committed on 15 September to provide answers by “the end of the week”. This did not happen and he then committed, in writing again, to provide answers by the end of the 26<sup>th</sup> September. A response was provided on 3 October but was unclear. The first three questions and answers (first three questions are provided verbatim.

*Question:* How many elephants were hunted in your province in the last year? Can you provide figures for the past five years?

*Answer:* 28 elephants were hunted.

*Question:* How many elephants were destroyed as damage causing animals last year (Also by year dating back as far as 2000 as possible?)

*Answer:* 37 elephants were destroyed as DCA.

*Question:* How many elephants were destroyed in terms of ecological management last year (And by year dating back to 2000 if possible)?

*Answer:* In terms of ecological management, 21 elephants destroyed.

When asked to specify for which year these figures applied and to provide the breakdown the query was then sent back to other officials to answer. Another response, to which another official contributed, was received on 15 October.