September 20, 2019

Chair: Scientific Authority
South African National Biodiversity Institute
2 Cussonia Avenue
Brummeria
Pretoria
0001
Republic of South Africa

Re: EIA Comments on South Africa 2019 Black Rhinoceros Non-detriment Findings

Dear Scientific Authority of South Africa:

The Environmental Investigation Agency (EIA) is writing in response to the invitation to submit information relating to the non-detriment findings (NDF) for *Diceros bicornis* (Government Gazette No. 42660, Notice No. 1104, dated 22 August 2019). We appreciate the opportunity to provide our comments and for the publication and circulation of written non-detriment findings for public input.

EIA is an international campaigning organization committed to investigating and exposing environmental crime and campaigning to protect endangered species and the natural world. EIA has worked to protect rhinos from poaching and the trade in their horn for nearly 30 years

EIA supports the recommendation of the South African Scientific Authority against the export of black rhinoceros horn for primarily non-commercial purposes. EIA is opposed to domestic and international rhino horn trade for commercial and non-commercial purposes, except in legitimate scientific or law enforcement cases.

EIA further supports efforts by South Africa to translocate back rhinos to establish new populations in countries that make up the historic range of the black rhino, including such translocations to Chad, Botswana, Eswatini, Mali, Tanzania, Zambia, and Zimbabwe. However, the recent tragic losses of translocated black rhinos in Chad and Kenya underscore the risks associated with the movement of black rhinos to new areas, and EIA encourages South Africa to undertake all necessary research and precautions in its translocation efforts.

EIA has focused its comments on the following components of the NDF: 1) conclusions reached regarding international trade in rhinoceros horn; 2) outdated population estimates and poaching data; and 3) changes to South Africa's black rhinoceros annual trophy quota adopted at the 18th meeting of the Conference of the Parties to the Convention on International Trade in Endangered Species of Wild Fauna and Flora (CITES CoP18).

1. There is an unacceptable risk that legal rhino horn exports will substantially increase demand for rhino horn and cause rhino poaching rates to skyrocket cancelling out any short-term profits gained from trade.

EIA has serious concerns about the potential impacts that legal international trade in rhino horn, whether for commercial or primarily non-commercial purposes, will have not only on South Africa's black and white rhino populations but also on all other populations of African and Asian rhino species.

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The assertion that the ban on international trade in rhino horn under the auspices of CITES has failed is repeated throughout the NDF. The consistently high level of rhino poaching over the past several years is the primary argument offered to justify this claim. However, labeling the CITES rhino horn trade ban as "failed" is an inaccurate and misleading claim that ignores historical context and key dynamic factors affecting trade including international and domestic politics, governance, economic development, enforcement, technological advancement, and consumer demand.

For instance, after the rhino horn trade ban was enacted in 1977 it took several decades for all rhino range, transit, and consumer states to accede to the Convention, amend legislation to comply with CITES, and implement the trade restriction. The international rhino horn trade ban, reaffirmed most recently at CITES CoP18 by the vast majority of Parties, including African and Asian rhino range states, has succeeded when Parties affected by rhino poaching and illegal rhino horn trade have instituted and enforced their own supporting domestic trade bans. This was the case in the 1990s and early 2000s after key rhino horn markets in China, Taiwan, Yemen, and South Korea were closed, which caused rhino poaching rates to drop off sharply and allowed rhino populations to begin to recover.[1] Advocating for and instituting policies that promote trade in rhino parts and derivatives undermines the ban and the efforts by the majority of CITES Parties to reduce demand for rhino horn and improve enforcement.

Legal Trade is Likely to Stimulate Demand for Rhino Horn and Increase Poaching

It is alarming that the Scientific Authority has downplayed the potential effects on global rhino poaching rates that could result from legal horn exports increasing demand for rhino horn products in consumer countries, especially considering that poaching is identified as the current major threat to South Africa's black rhinos in the NDF.

There is clearly significant demand for rhino horn in countries like China and Vietnam where rhino horn is used in traditional medicine or carved into trinkets. Based on publicly available information, between April 2006 and 18 September 2019 EIA has documented 677 rhino horn seizures globally involving approximately 6,732 kg of rhino horn.[2] 1,932 kg of rhino horn has been recovered in seizures made in or linked to China (28.7% percent of total seizures), with another 1,860 kg of rhino horn seized in or linked to Vietnam (27.6 percent of global seizures). This demonstrates that substantial demand for rhino horn exists in these two countries despite their domestic laws prohibiting trade in rhino horn. Much of the horn destined for illegal Asian markets is derived from South Africa. EIA has documented the seizure of approximately 2,493 kg of rhino horn has been in South Africa since April 2006.

The NDF cites Moyle (2018), who argues that there is no strong empirical or theoretical evidence that stigmatizing demand for rhino horn would be able to compensate for a lack of competition provided by legal trade, yet this argument fails to consider impacts legal trade could have on the level of demand, including the potential to stimulate increased demand.[3] Moreover, the goal of any trade scheme for rhino horn, whether that is commercial international trade or exports for primarily non-commercial purposes derived from commercial domestic trade, will be to maximize rhino horn sales so as to maximize profit regardless of the intended use of the profit. Thus, stimulating demand to increase levels of trade will be at the core of any rhino horn trade scheme, and with no accurate estimate of the potential consumer market for rhino horn in demand countries like China and Vietnam, a precautionary approach to an NDF analysis must heavily weigh the potential for consumer demand to skyrocket and in turn lead to increased poaching.

The NDF also references a study by MacMillan et al. (2017) which concludes that providing Vietnamese consumers an opportunity to acquire legally-sourced rhino horn would "crowd out" horns sourced from poaching because consumers preferred non-lethal harvesting of horn.[4] However, a separate study commissioned by USAID, which was not referenced in the NDF, also examined drivers of rhino horn consumption in Vietnam and in contrast to the findings of MacMillan et al. (2017) revealed that messaging

about animal cruelty and extinction did not affect the purchase intentions of consumers, who felt that purchasing rhino horn was acceptable because they were not the ones conducting the killing.[5]

MacMillan et al. (2017) also expected that the price of rhino horn would fall due to a "loss of prestige and exclusivity" of rhino horn brought about by legal trade. This is however inconsistent with other studies that examined consumer attitudes toward rhino horn and other high-value wildlife products. Recent findings by Vu & Nielsen (2018) revealed a preference for wild-sourced rhino horn among Vietnamese consumers suggesting that legal trade could increase demand for poached rhino horn.[6] Similarly, a consistent consumer preference has been documented for wild-sourced big cat parts and derivatives over farmed sources (for example, see Gratwicke et al. (2008)[7] and World Animal Protection (2019)[8]). The results of these studies underscore the high degree of uncertainty with respect to drivers of demand and consumer preferences, which must be sufficiently considered in any precautionary NDF.

The threats from commercial rhino horn trade to rhino populations located within and outside of range states that have expressed a desire to engage in commercial rhino horn trade have led to CITES Parties overwhelmingly rejecting rhino horn trade proposals at the two most recent meetings of the Conference of the Parties to CITES in September 2016[9] and August 2019.[10] Both African and Asian rhino range states voiced their opposition to these proposals, citing among their concerns the potential for legal commercial trade to stimulate demand thereby posing a significant risk to their rhino populations.[11] Indeed, at the 2nd Asian Rhino Range Countries Meeting held in February 2019 the Governments of Bhutan, India, Indonesia, Malaysia, and Nepal signed the New Delhi Declaration agreeing "to call to the attention of all countries that possible opening of international trade of rhino horn and other derivatives will have a severe detrimental impact on rhino populations in Asian rhino range countries."[12]

Legal Rhino Horn Exports Would Exacerbate Enforcement Challenges

It is also unclear whether the Scientific Authority fully considered the enforcement challenges legal rhino horn exports would pose in South Africa and in transit and consumer countries. As South Africa's experience with rhino pseudo-hunting has demonstrated, it is doubtful that the CITES Management Authority will be able to confidently conclude that exports of rhino horn will be used for primarily non-commercial purposes in the State of import, or that the State of import can ensure that rhino horn would not enter into illegal trade as has occurred previously with rhino hunting trophies.

From 2006 through 2012, South Africa's trophy hunting industry was co-opted by Asian nationals, predominantly of Vietnamese origin, who acquired rhino horns through legal trophy hunts and exported the horns to Asia where they were traded illegally. South Africa allowed these trophy exports to Vietnam to continue for six years despite the evidence of criminal activity and the failure of Vietnam to account for rhino trophy imports. Between 2003 and 2010 Vietnam submitted CITES trade data reporting the import of 170 rhino horns in the form of trophies sourced from South Africa. Vietnam's data failed to account for approximately 75 percent of the 657 horns exported to Vietnam according to the CITES trade data submitted by South Africa.[13] Only after the South African government prohibited the issuance of rhino trophy export permits to Vietnamese nationals in 2012 did the pseudo-hunting phenomenon subside.[14] However, while the NDF claims that pseudo-hunting has now "ceased" because of the amended Norms and Standards instituted in 2012, there is evidence suggesting that pseudo-hunting may still be occurring albeit at greatly reduced levels. For instance, the 2019 IUCN/TRAFFIC report identifies discrepancies in the rhino trophy export data provided by South Africa and import data provided by "non-traditional" trophy hunting countries including China, Malaysia, and Kuwait.[15]

Regardless of whether the South African CITES Authorities would be confident enough that rhino horn exports will not be detrimental to the survival of wild rhinos to issue a CITES export permit, it is unclear whether the horn could legally be imported by other countries considering that most CITES implementing

legislation prohibits domestic and international rhino horn trade, except in special circumstances such as for law enforcement or scientific purposes.

South Africa's Legal Domestic Rhino Horn Market Facilitates Illegal Trade

As has been demonstrated for rhino horn and other high-value wildlife products from threatened species including elephant ivory, pangolin scales, and tiger parts, parallel legal markets stimulate demand, complicate enforcement, and provide laundering opportunities.[16] In 2009 a moratorium on domestic rhino horn trade was put in place in South Africa as rhino poaching levels were starting to spiral out of control and the existing regulatory framework for rhino management and trade was increasingly exploited. Pro-trade advocates responded by suing the government, and in April 2017 the South Africa Constitutional Court upheld a lower court ruling repealing the domestic trade moratorium based on the finding that the Department of Environmental Affairs (DEA) made a procedural error when instituting the moratorium.[17]

Before the moratorium was enacted, legal domestic rhino horn trade in South Africa provided opportunities to launder illegally sourced rhino horn onto the legal market and eventually make its way to consumers in Asia. For example, South Africa's permit system for possession and sale of rhino horn was taken advantage of by dealers who would sell multiple horns under the same permit, sometimes for weeks or months at a time.[18]

In 2014, the DEA conducted an analysis on the viability of legalizing domestic rhino horn trade, which ultimately recommended leaving the moratorium intact.[19] The DEA justified its recommendation by noting that the mechanisms for controlling a legal trade in South Africa were not in place, that the amount of rhino horn in privately owned stockpiles was unknown, and that some private rhino owners were noncompliant with permitting regulations.[20] The DEA concluded that these factors would lead to laundering of illegal horn into stockpiles and trafficking rhino horn abroad if the domestic trade moratorium were lifted.[21] Only after these issues were rectified, and after a "secure, national electronic permitting system and rhino database" was established and utilized by all private rhino owners to disclose the exact contents of their rhino horn stockpiles, would the DEA consider lifting the domestic trade moratorium and consider offering a legal trade proposal at CITES.[22]

The issues identified in the 2014 viability analysis were not addressed before the moratorium was overturned in 2017 nor have they been addressed in the more than two years since domestic rhino horn trade was reinstated in South Africa. No nationwide electronic permitting system has been implemented, there is a backlog for RhODIS DNA analysis requests, and accurate estimates of the total amount of rhino horn kept in private stockpiles remains unknown, presenting a major risk that poached or otherwise illegally-acquired horn can be laundered through these stockpiles.[23]

Draft regulations for a legal domestic rhino horn trade framework were published for public comment in February 2017,[24] and a second set of draft regulations was published in October 2018 after the NDF was prepared, yet at time of writing these regulations have not been finalized.[25] EIA has serious concerns with both sets of draft regulations, which are described in comments submitted by the Species Survival Network in response to the February 2017 draft regulations,[26] and in comments submitted by EIA in response to the October 2018 draft regulations.[27]

Despite these enforcement risks, the government of South Africa has issued dozens of permits to buy and sell thousands of rhino horns since the moratorium was lifted in 2017. As of July 31, 2019, 23 permits were issued for the sale of 2,075 rhino horns and an undisclosed number of permits were issued to 27 buyers.[28]

Already, South Africa's domestic rhino horn market has been linked to illegal trade according to the DEA, which has expressed its "serious concern that some of the rhino horn which was sold in terms of permits

issued by the department as part of the legal domestic trade bas been linked to illegal activities."[29] One of the most high-profile cases of illegal trade facilitated by South Africa's legal domestic market involved the April 2019 seizure of 167 rhino horns that originated from the stockpile of a private rhino owner who operates the largest captive rhino breeding facility in South Africa.[30] The horns were being transported without the proper permits and were allegedly destined for "South East Asian markets" according to the official police statement.[31] While the suspects were reportedly set to appear in the Brits Magistrate's Court on July 12, 2019, it is unclear if this occurred and the current status of the case is unknown.

Moreover, recent seizures of rhino horn in Asia originating from South Africa may be linked to illicit sales of rhino horn from private stockpiles.[32] It is crucial that the South African authorities and their counterparts in countries that have made these rhino horn seizures cooperate on enforcement action, including DNA analysis of seizures, to determine the source and nature of the illegally traded horns.

Furthermore, maintaining a domestic rhino horn market that is linked to illegal activities fails to comply with a decision adopted at CITES CoP18 for Parties to close domestic rhino horn markets that contribute to poaching or illegal trade.[33] EIA urges South Africa to prohibit exports of rhino horn and rhino horn products for commercial and primarily non-commercial purposes and to close its domestic rhino horn market to comply with the CITES decision adopted at CITES CoP18.

2. The NDF Relies on Outdated Black Rhinoceros Population Estimates and Poaching Data

A rhino poaching crisis has been raging across Africa for more than a decade which has seen more than 9,200 rhinos killed since 2006.[34] All rhino populations are at risk from poaching and illegal trade, though the vast majority (86 percent) of the poaching in Africa has occurred in South Africa, which has lost at least 7,912 rhinos during this time.[35]

The 2019 NDF for black rhino exports from South Africa was completed in March 2018 and utilizes outdated rhino population estimates from 2015. Updated black population estimates through 2018 are available from the IUCN Species Survival Commission African rhino specialist group (AfRSG) in its report compiled jointly with TRAFFIC (2019 IUCN/TRAFFIC report) for CITES CoP18.[36]

According to the 2019 IUCN/TRAFFIC report, the continental black rhino population increased by approximately 13 percent slightly from 2012 to 2017 up to an estimated 5,495 rhinos. An estimated 2,046 of these black rhinos were located in South Africa.[37]

In CoP18 Inf. 78, South Africa provided an updated 2018 estimate for its black rhino population.[38] According to the population estimate provided by the AfRSG, South Africa's black rhino population declined by approximately six percent to an estimated 1,924 rhinos by the end of 2018.[39] An average of 43 black rhinos were poached in South Africa annually between 2010 and 2018 according to the AfRSG, however these estimates are conservative as not all rhino carcasses are identified. For instance, an estimated 27.6 percent of black rhino carcasses go undetected in Kruger National Park. This is equivalent to between 223 and 287 undetected black rhino mortalities (due to both to poaching and natural mortalities) in Kruger National Park since 2016.[40]

The black rhino population remains small and affected by exploitation and extrinsic factors such as poaching and illegal trade. It therefore meets the biological criteria for listing on Appendix I of CITES, and EIA supports the Scientific Authority's recommendation against trade in black rhino horn.

3. Changes to South Africa's Black Rhino Trophy Export Quota Adopted at CITES CoP18

At CITES CoP18, Parties agreed to amend CITES Resolution Conf. 13.5 (Rev. CoP18) to change South Africa's annual black rhino trophy export quota from five to a number "not exceeding 0.5% of the current total black rhinoceros populations in South Africa in the year of the export (equally applied to all three subspecies i.e. 0.5% of the total population of each of the three subspecies)."[41] Based on the 2018 population estimate for South Africa's black rhino population, this would increase the quota to nine trophies annually. EIA notes with concern that, according to CoP18 Doc. 48, an export quota of nine trophies annually would increase the annual offtake to 48 percent of the potential annual population increment for the black rhino.[42]

Additional language was added to Resolution Conf. 13.5 (Rev. CoP18) at CITES CoP18 requiring South Africa to inform the CITES Secretariat of their export quota at least 30 days before the start of period to which the quota relates in order for it to be published on the CITES website, and requiring South Africa to set a "minimum science-based threshold" for its black rhino population below which the quota described in the Resolution would not apply.[43]

This new Resolution language was the result of deliberations in the margins at CoP18 and not included in South Africa's original submission. There was no discussion in Committee I or in Plenary about how this minimum threshold would be determined or when it would be announced. EIA encourages the Scientific Authority to act quickly to set this threshold, publicly share the methodology utilized for its development, and seek stakeholder input.

In CoP18 Inf. 78, South Africa set out the expected timeline for establishing annual export quotas based on annually updated black rhino population estimates.[44] According to CoP18 Inf. 78, the timeline would be comprised of a three-year process:

- Year 1: population estimate conducted; trophy hunt applications submitted
- Year 2: population data analyzed; applications processed; CITES Secretariat informed of the export quota by 1 December
- Year 3: hunt and export take place

While Inf. 78 claims that there would be sufficient time to retract a permit in year 2 if new data indicates the new quota is unsustainable, EIA is concerned that population estimates may not be collected, analyzed, and shared on an appropriate timescale.

The NDF for 2019 relied on black rhino population estimates from 2015, as did South Africa's submission to CITES CoP18 (Doc. 48) that sought the amendment to its black rhino trophy quota. It is unclear why up-to-date population estimates were not included in these two documents.

Moreover, the DEA has failed to provide official white and black rhino population estimates to the public for 2018 and 2019 (with the exception of the updated black rhino numbers in CoP18 Inf. 78, though this is an obscure technical document and not easily accessible by the public at large). Questions have also been raised about the accuracy of the block count survey methodology utilized in Kruger National Park.[45]

EIA strongly urges South Africa to provide timely and transparent annual population estimates for both its white and black rhinos, especially considering the recent declines in both its black and white rhino populations. Accurate, up-to-date population and monitoring data is essential to ensure management decisions and policy proposals can be thoroughly evaluated by all stakeholders to determine whether such decisions and proposals will contribute to the conservation of South Africa's rhinos.

Conclusion

The Critically Endangered black rhinoceros (*Diceros bicornis*) remains at significant risk from poaching and illegal trade, and survives at just a fraction of its historic abundance throughout its range. Global seizure data demonstrates that the demand for rhino horn remains significant, especially in China and Vietnam.

International trade in rhino horn, whether for commercial purposes or primarily non-commercial purposes, would increase demand for rhino horn that could generate a catastrophic rise in poaching levels for all rhino species. The international community has recognized the substantial risks associated with the trade in rhino horn, and has repeatedly upheld the CITES ban on international trade in rhino horn. Repealing this trade ban, or circumventing the ban through the exploitation of exemptions and loopholes, ignores the risks posed to rhinos by trade in their horn and undermines demand reduction and enforcement efforts employed by the global community. EIA supports the recommendation of the South African Scientific Authority against the export of black rhinoceros horn for primarily non-commercial purposes.

Recent amendments to South Africa's annual black rhino trophy export quota approved by the CITES Conference of the Parties require accurate, timely annual population estimates and the development of a science-based threshold to prevent unsustainable trophy exports. EIA is concerned that an increase to nine trophies annually raises the total offtake to 48 percent of the potential annual population increment, and that population estimates may not be collected, analyzed, and shared on an appropriate timescale. EIA strongly urges South Africa to regularly and transparently provide its annual black rhino population estimates to the CITES Secretariat and to quickly develop the science-based threshold followed by its publication and circulation for stakeholder input.

Sincerely,

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Environmental Investigation Agency

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