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investigation
agency

Briefing document for CITES SC78

HORNS ON THE HORIZON:

A review of commercial rhino
horn trade developments in
South Africa

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ABOUT EIA

We investigate and campaign against environmental crime and abuse. For over three decades, EIA has exposed transnational wildlife crime with a focus on elephants and rhinos, and forest crimes such as illegal logging and deforestation for agricultural commodities. We reduce the impact of climate change by campaigning to eliminate powerful greenhouse gases and improve energy efficiency in the cooling sector, and exposing related illicit trade. We use our findings to campaign for new legislation, improved governance, and more effective enforcement.

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Front cover: Southern white rhinoceros in Hluhluwe-iMfolozi Park, South Africa. ©EIA

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EXECUTIVE SUMMARY

South Africa is arguably the most important country for rhino conservation in Africa. It has the largest combined white and black rhino population on the continent, and it has also been the hardest hit by the rhino poaching crisis that has persisted for nearly two decades.

South Africa is at the forefront of the enforcement response to organized criminal elements responsible for rhino poaching and trafficking. The decisions it makes with respect to rhino conservation and trade policies have global impacts, especially for other rhino range states resulting in a profound influence and impact on the wellbeing of rhino populations across Africa and Asia.

Through an examination of recent developments across multiple sectors - from government policy to private initiatives – EIA’s analysis reveals a systematic push to develop a domestic rhino horn industry and market in South Africa that, if successful, would severely undermine regional and global rhino conservation efforts, catastrophically increase demand for rhino horn, sabotage domestic and international enforcement efforts, and contravene policies of the Convention on International Trade in Endangered Species of Wild Fauna and Flora (CITES).

In 2024, South Africa’s Department of Forestry, Fisheries and the Environment (DFFE) published two draft policy documents that included a raft of proposals aimed at establishing a domestic rhino horn market supported by new industries for rhino horn carving and the

production of medicines containing rhino horn powder. The DFFE proposals explicitly call for the targeting of tourists from Asian countries as the main consumers of these rhino horn products, irrespective of the enforcement implications for key rhino horn trafficking destination countries like China and Vietnam where rhino horn possession and trade are illegal.

The policy documents provide little substance on how such a domestic rhino horn market would function in practice. There are no details on how a rhino horn trade scheme would avoid setting off a new wave of demand or poaching for rhino horn in South Africa, the region, or globally; nor do they address how to prevent the laundering of illegal horn, or the impact on global enforcement and behavior change efforts.

In addition, a private sector initiative called Rhinomics has been quietly amassing a giant stockpile of rhino

Opposite page: Black rhinoceroses in Hluhluwe-iMfolozi Park, South Africa.

Above: Rhino horn originating from a private stockpile seized in South Africa.

horn by accumulating horn across the country with plans to implement its vision for a national rhino horn market. Publicly available details from Rhinomics are scarce, including any relationship it has with the South African government relating to their stockpiles.

Commercial trade in rhino horn would spark new demand for rhino horn, which would have devastating impacts on rhino populations globally. For this precise reason, CITES Resolution Conf. 9.14 (Rev. CoP19) urges Parties to implement well targeted strategies for reducing the use and consumption of rhino parts and derivatives. The plans being hatched in South Africa would do the exact opposite.

The challenges facing the public and private stakeholders responsible for protecting South Africa's rhinos are immense, but pursuing commercial trade in rhino horn – domestic or international – will only exacerbate existing challenges and create new ones. EIA therefore urges South Africa to abandon plans to establish a commercial rhino horn trade and instead prioritize actions to tackle organized crime, corruption, and support countries like China and Vietnam to implement behavior change initiatives to eliminate consumer demand.

RHINOS IN SOUTH AFRICA

The conservation status of rhinos in South Africa presents a complex picture of both achievement and alarm. While South Africa continues to maintain the world's largest white rhino population and second largest black rhino population, ongoing poaching pressure has taken its toll. The country's southern white rhino population has experienced dramatic fluctuations, with numbers dropping precipitously from approximately 18,400 individuals at the end of 2015 to fewer than 13,000 by the end of 2021.¹ More recent estimates indicate there has been a slight rebound, with the population increasing to 13,991 by 2023, representing 80.1 percent of Africa's remaining white rhinos.² Yet this modest improvement masks the reality of a nearly 30 percent population loss within a single decade, highlighting the precarious state of the species.

In contrast, the Critically Endangered black rhino experienced modest but consistent growth from the mid-1990s until 2022. South Africa saw its black rhino populations increase from about 1,915 rhinos in 2012 to 2,065 by 2023, comprising about 32.1 percent of the continental total.³ However, in 2023 a surge in poaching caused the slow but steady recovery of the black rhino to falter for the first time since the early 1990s as the continental population fell by about one percent, with an estimated 6,421 black rhinos surviving in Africa at the end of 2023.⁴ The IUCN African Rhinoceros Specialist

Group attributes this decline directly to poaching losses in South Africa and Namibia.⁵

While aggregate population data provide an overview of rhino demographics in South Africa, they mask important geographical shifts in poaching pressures across the country in recent years. Kruger National Park, once the epicenter of the poaching crisis, has seen a notable decline in incidents, from over 1,000 rhinos lost annually during the peak period of 2013 to 2015 to just 78 cases in 2023.⁶ While anti-corruption interventions and enhanced security measures, such as intensive ranger patrols, advanced surveillance technology, and strengthened cross-border collaboration, likely contributed to this decrease, it is crucial to recognize that the decline in poaching is also attributed to the park's dwindling rhino population.⁷ Years of intense poaching have taken a severe toll on Kruger's rhinos, with numbers plummeting by approximately 90 percent between 2010 and 2023. Kruger National Park was once home to the largest population of free-roaming white rhinos on the planet with over 10,000 individuals. By the end of 2023 there were only an estimated 1,812 remaining.⁸ As the population has shrunk, the available targets for poachers have also diminished, leading to a decrease in poaching incidents.

In response, organized rhino poaching and trafficking networks have adapted their tactics and shifted their focus to other regions, particularly Hluhluwe-iMfolozi Park (HiP) in the province of KwaZulu-Natal. KwaZulu-Natal experienced consecutive years of record-breaking rhino poaching losses in 2022 and 2023 with 244 and 325 rhinos killed, respectively.⁹ An ambitious dehorning program in HiP helped staunch the poaching temporarily in 2024, yet a rhino poaching surge in HiP October, as well as the December discovery of 19 carcasses of rhinos in Kruger National Park that had also undergone dehorning, underscore the limitations of dehorning as a poaching deterrent.¹⁰

Poaching-induced rhino population declines in government-run parks has meant that private rhino owners are now responsible for protecting more than half of South Africa's white rhino population. This has come with considerable cost, as most private rhino owners finance their own private ranger patrols and other expensive anti-poaching interventions such as dehorning.

Rhino poaching is driven by demand for rhino horn, particularly in China and Vietnam, where the horn is perceived by some as a status symbol and coveted by others for its perceived medicinal properties to treat ailments ranging from fever to cancer. Criminal syndicates have capitalized on this demand by developing sophisticated poaching and trafficking



operations that exploit local poverty in rhino range states and corruption in all countries located along the illegal rhino horn trade chain.

Despite nearly two decades of this rhino poaching crisis, South Africa has made commendable progress in addressing the key drivers of rhino poaching. The National Integrated Strategy to Combat Wildlife Trafficking represents South Africa's first comprehensive national framework for confronting wildlife trafficking as a serious organized crime and security threat rather than solely a conservation challenge.¹¹ This landmark strategy positions the South African Police Service (SAPS) at the center of a sophisticated interagency matrix structured around three main strategic objectives: enhancing law enforcement efforts toward effective investigation and prosecution; increasing government commitment to detect and prevent wildlife trafficking; and strengthening international law enforcement collaboration.

The launch of the Environmental Enforcement Fusion Center (EEFC) by the Department of Forestry, Fisheries and the Environment (DFFE) has been a major force multiplier for tackling rhino horn trafficking and other wildlife crime in South Africa. The EEFC is a central hub for enforcement information and intelligence collection and analysis that is used to inform investigations by SAPS and other law enforcement agencies. Further bolstering these efforts, the South African Anti-Money Laundering Integrated Task Force (SAMLIT), a public-private partnership between regulatory agencies, banks, and enforcement agencies, has established a working group dedicated to addressing the illegal wildlife trade through financial investigations.

These government agencies and entities are increasingly working together, along with civil society partners, to maximize available investigation tools, techniques, and intelligence to tackle rhino poaching, rhino horn trafficking, and other organized environmental crime. This work is paying off, as evidenced by recent successes such as Project Blood Orange in which a multi-year investigation resulted in the arrest and conviction of more than a dozen individuals linked to rhino poaching in Kruger National Park, including two SANParks rangers.¹²

All of this progress is at risk of being undermined if plans to establish a domestic market for rhino horn in South Africa become a reality.

RHINOS AND CITES

The Convention on International Trade in Endangered Species of Wild Fauna and Flora (CITES) is the fundamental international legal framework governing rhino trade. By 1977 all rhino species were included on Appendix I of CITES, effectively giving them maximum protection by prohibiting international commercial trade in rhino horn and all other parts and derivatives.

However, South Africa's population of southern white rhino (*Ceratotherium simum simum*) was transferred to Appendix II in 1994, followed by Eswatini's southern white rhinos a decade later. Both South Africa and Eswatini's southern white rhino Appendix II listings are accompanied by an annotation limiting commercial trade to live specimens and hunting trophies. Most

Above: Southern white rhinoceroses in Kruger National Park, South Africa.

recently, at the 19th meeting of the Conference of the Parties to CITES (CoP19, Panama, 2022) Namibia's southern white rhino population was also transferred to Appendix II for the exclusive purpose of allowing international trade in live animals for in-situ conservation only, and only within the natural and historical range of the species. The black rhino remains listed on Appendix I throughout its entire range.

CITES Resolution Conf. 9.14 (Rev. CoP19) provides additional guidance to Parties on rhino conservation and trade issues, with particular emphasis on actions to protect rhinos from poaching and illegal trade. It urges Parties to implement comprehensive legislation and enforcement controls, stockpile management and trade restrictions, and specialized investigation techniques. Critically, Resolution Conf. 9.14 (Rev. CoP19) directly addresses the root cause of rhino poaching and rhino horn trafficking: demand. Paragraph 2(e)(i) of the Resolution urges those Parties affected by poaching and rhino horn trafficking to: "as a matter of priority work with all user groups and industries to **develop and implement well targeted strategies for reducing the use and consumption of rhinoceros parts and derivatives, with the aim of achieving measurable change in consumer behaviour.**"¹³ [emphasis added]

SOUTH AFRICAN LAWS, REGULATIONS, AND POLICIES PERTAINING TO DOMESTIC RHINO HORN TRADE

Domestic Trade Regulations

In 2009, South Africa instituted a moratorium on all domestic rhino horn trade in order to help address the rhino poaching crisis that was spiraling out of control.¹⁴ The moratorium was designed to prevent legal rhino horn trade from being co-opted by organized crime groups to obtain horn and traffic it abroad to buyers in Asia. Unfortunately, pro-trade advocates sued the government with the aim of overturning the moratorium.

Ultimately, South Africa's Constitutional Court rescinded the domestic moratorium on rhino horn trade in 2017, not because the substance of the moratorium was unconstitutional but because the Department of Environmental Affairs (now DFFE) made a procedural error when it promulgated the moratorium regulations.¹⁵ As a result, legal domestic trade in unworked rhino horn has been permitted in South Africa for nearly eight years.

Possession and trade in rhino horn in South Africa requires permits issued by provincial conservation

departments and DFFE, respectively. These permits in turn require that the rhino horn be appropriately marked, microchipped, and its DNA profile registered with DFFE via the Rhino DNA Indexing System (RhODIS).¹⁶ Transporting a rhino horn also requires permits that are issued by provincial authorities. If a rhino horn is transported across provincial lines, transport permits must be issued by the relevant provincial conservation departments in all provinces through which the rhino horn will be transported.

Regulatory Limbo

In 2020, DFFE promulgated additional regulations relating to rhino horn trade, including special prohibitions on "certain restricted activities" involving rhino horn.¹⁷ These important, common-sense regulations would have formally prohibited modifying rhino horn in such a way as to render it difficult or impossible to trace. Specifically, the regulations made it illegal to: 1) produce or possess rhino horn powder, slivers, and/or shavings; and 2) trade rhino horn powder, slivers, and/or shavings as well as small pieces of rhino horn less than 5 cm in length.

The domestic rhino horn trade regulations were intended to come into force in April 2023, but were withdrawn in March 2023 due to a lawsuit brought against DFFE by Wildlife Ranching South Africa and the Professional Hunters' Association of South Africa. These organizations took issue with new Threatened or Protected Species (TOPS) regulations promulgated earlier that year, and as part of a settlement to avoid court proceedings DFFE withdrew the new TOPS regulations.¹⁸ Since the rhino horn trade regulations were dependent on the new TOPS regulations, as were several other pieces of legislation pertaining to elephants and leopards, these were therefore also withdrawn. While revised TOPS regulations were republished for public comment in October 2023,¹⁹ at time of writing DFFE has still not republished the rhino horn trade and special prohibition regulations.

The delay in reissuing these important rhino horn trade regulations becomes even more concerning when taking into account two documents published by DFFE for public comment in 2024: the draft National Biodiversity Economy Strategy (NBES) and the draft Biodiversity Management Plan for Black Rhinoceroses and White Rhinoceroses (BMP). These policy documents are critically important for the future of South Africa's wildlife and the communities that depend on them, yet both contain deeply concerning proposals to flip South Africa's current conservative rhino horn trade regulatory framework on its head which, if implemented, would lead to disastrous consequences for rhino populations everywhere.



National Biodiversity Economy Strategy

The purpose of the NBES is to optimize biodiversity-based business potentials and contribute to economic growth while “maintaining the ecological integrity of the biodiversity resource base for thriving people and nature.”²⁰ The draft NBES contains dozens of proposed actions to achieve these goals, but it is Action 10.4 that could dramatically impact rhino conservation and global anti-rhino horn trafficking enforcement.

Action 10.4 seeks to “develop and implement a strategy for a market for regulated domestic trade in high-end parts and derivatives (e.g. rhino horn and elephant ivory) for local value-add enterprises based on processing and use of products.”²¹ There is currently no local demand for rhino horn within South Africa – aside from speculative stockpiling – which is why the draft NBES identifies the need for “innovative approaches...to identify products, and develop the necessary local markets” that will “maximise the value of domestic trade.”²²

No guesswork is required to understand DFFE’s vision for innovation. The Strategy proposes a plan to artificially **increase demand** for rhino horn through the establishment of “health clinics to administer traditional remedies using rhino horn for health tourists from the far East” as well as to prop up an ivory carving industry “for local sale and export for personal use.”²³

By specifying that exports would be for “personal use,” the draft NBES seems to suggest that souvenirs made from wildlife products regulated by CITES Appendix I trade restrictions, such as rhino horn and elephant ivory, could easily be shipped to other countries. However, these products would still require CITES permits from the exporting and importing country in accordance with Article III of the Convention. It is difficult to conceive that

such import permits would be granted given that rhino horn trade is prohibited in most countries aside from South Africa.

Rhinoceros Biodiversity Management Plan

Three months after releasing the draft NBES in March 2024, DFFE published the draft BMP.²⁴ The BMP is intended to serve as a species recovery plan for black and white rhinos in South Africa and envisions a future with thriving national herds that are no longer threatened by poaching and rhino horn trafficking. It is therefore alarming that the draft BMP doubles down on the proposed domestic trade activities in the NBES and incorporates the goal of overturning the CITES ban on international commercial rhino horn trade, both core components of the plan.

The draft BMP is riddled with contradictions about reducing demand for rhino horn while simultaneously promoting trade in rhino horn – which inherently requires stimulating demand. For instance, the fourth Objective of the BMP is “To effectively manage / reduce demand for rhino derivatives.”²⁵ Managing and reducing demand are contradictory, and it is unrealistic to try and achieve both of these competing goals.

DFFE’s core approach to achieving Objective 4 of the draft BMP is to “enhance domestic trade through local beneficiation of rhino and its derivatives.”²⁶ In other words, the draft BMP calls for increasing domestic rhino horn trade by increasing demand through working the horn into commercial products. The plan includes a proposed action that would operationalize this approach: “Develop and implement a strategy for regulated domestic trade in rhino parts and derivatives.”²⁷

Above: 245 kg of rhino horn seized in China in 2019. Many of the horns contained microchips, which indicate that they were sourced from a government or private stockpile.

This is not the only rhino horn trade strategy envisioned in the draft BMP. The plan also calls for the development and implementation of a “Demand Management Strategy which has mechanisms to overcome potential tensions between demand reduction & trade promotion.”²⁸ No further details are provided about such “mechanisms” that would overcome this demand reduction-trade promotion paradox, nor is there any explanation of how the demand management strategy would inform, or be informed by, the proposed domestic rhino horn trade strategy.

The draft BMP also proposes studying the *illegal* trade in rhino horn to inform the development of a domestic market in South Africa, including commissioning studies on (illegal) consumer markets to better understand consumer attitudes, and collaborating with TRAFFIC to implement a monitoring system to gather information relating to prices paid to poachers and the quantity of horn traded.²⁹

At time of writing, the public comment periods have closed for the draft NBES and draft BMP, and DFFE has not promulgated a final version of either document for implementation.

RHINO HORN STOCKPILES

The proliferation of dehorning as an anti-poaching tool employed by government agencies and private rhino owners has resulted in the rapid accumulation of several tonnes of stockpiled rhino horn in South Africa. These rhino horn stockpiles are kept in dozens of locations located throughout the country, including private safes and government-controlled storerooms. Between 2018 and 2021 alone, at least 2,217 rhinos were dehorned in rhino range states, adding nearly 4,500 horns to stockpiles.³⁰ In 2024, Hluhluwe-iMfolozi Park dehorned more than 1,000 of their white rhinos, adding at least another 2,000 horns to South Africa’s stockpiles.³¹ There are no reliable recent estimates of the total volume of rhino horn stockpiles in South Africa. The most recent estimate is from 2019, when the government reported 27.7 tonnes of horn in government stockpiles and 22.5 tonnes in private stockpiles.³²

South Africa’s rhino horn stockpiles undermine conservation efforts, including dehorning. By maintaining these stockpiles rather than destroying them as other Parties like Kenya and Vietnam have done,³³ South Africa has created an unnecessary and costly enforcement challenge for itself. The very existence of large horn stockpiles is a security risk; they sustain speculative interest in future trade, are expensive to secure, and are at constant risk of theft, as the 2023 robbery of more than 50 horns from North West

province’s rhino horn stockpile demonstrated.³⁴ At time of writing, these horns have not been reported recovered nor has anyone been convicted in connection to this case.

Rhino horn sourced from stockpiles regularly winds up in seizures made abroad. In one especially notable case that occurred in June 2019, China made the largest reported rhino horn seizure outside of Africa since the current poaching crisis began when it recovered 245 kg of horn from a ship anchored off Southeast China that had come from Mozambique.³⁵ Many of the horns contained microchips, a clear indicator that they once belonged to a private or government stockpile. The dozens of tonnes of rhino horn locked away in safes across South Africa together with the domestic rhino horn trade proposals contained in the draft NBES and draft BMP have sent clear signals to rhino horn speculators in South Africa, and the private initiative called Rhinomics is betting big on a government-backed domestic market for rhino horn products.

Rhinomics is a private venture that has been quietly and systematically accumulating rhino horn in South Africa, with the aim of establishing a controlled legal trade and promoting pro-rhino horn trade policies on a national and global scale. According to the Scientific Authority of South Africa, Rhinomics has made significant progress in solidifying itself as a key player in any future domestic rhino horn industry in South Africa. As of October 2024, “A vault and software management system for all of South Africa’s rhinoceros horn, as well as a national network for logistics and storage have already been established under this private initiative.”³⁶ On its website, Rhinomics also claims to have developed models for tracing horn and schemes for financing trade, but it has not provided information on how these models and schemes would be implemented or monitored effectively.³⁷ The relationship, if any, between Rhinomics and the South African government and provincial conservation agencies is unknown.

CREATING A DOMESTIC RHINO HORN MARKET IN SOUTH AFRICA WOULD SPELL DISASTER FOR RHINOS

The convergence of these various factors - from policy reforms to private sector preparations - paints a stark picture of South Africa’s trajectory toward establishing an expansive domestic market for rhino horn. This shift, while presented as a pragmatic solution to conservation challenges, threatens to devastate rhino populations by stimulating demand, complicating enforcement efforts, and undermining crucial CITES protections. Without

immediate review, South Africa's current path risks not only compromising its own conservation achievements but also sabotaging global efforts to protect rhinos from unsustainable trade pressures.

The enforcement implications of these proposed initiatives are monumental, and the plan to target foreign tourists from Asian countries relies on the bold assumption that countries like China and Vietnam will happily reverse course and scrap years of heavy investment in efforts to reduce rhino horn consumption and strengthen laws and enforcement against rhino horn trade. Indeed, the Vietnamese NGO PanNature submitted formal comments to DFFE on the draft NBES to convey their concerns with the rhino horn trade proposals:

*"Asia is considered a transit and consumption point for wildlife, including products from rhino horn and ivory originating from Africa, especially Vietnam and China. Therefore, the Republic of South Africa's new policy, if adopted, will undermine ongoing demand reduction and behavior change efforts in these countries."*³⁸

PanNature also underscored that numerous studies have shown that rhino horn has no curative health benefits, and that attempting to use rhino horn as medicine rather than plant-based alternatives "goes against the trend of the times and global commitments."³⁹ It is unclear whether DFFE consulted any governments from Asian countries, or even South African law enforcement

agencies like SAPS and the South African Revenue Service (South Africa's customs agency) before suggesting rhino horn tourism in an official government strategy document.

Targeting nationals from China, Vietnam, and other countries with offers of unfettered access to rhino horn will lead to increased demand and increased poaching. The historical evidence shows this is the case, from China's domestic rhino horn market fueling poaching and illegal trade until it was closed in 1993 to Vietnamese wildlife traffickers igniting the current rhino poaching crisis by exploiting lax trophy hunting laws in South Africa to secure easy access to rhino horn.

A legal rhino horn market in South Africa would undermine enforcement efforts domestically, regionally, and globally. The now-rescinded rhino horn trade regulations that would have prevented trade in worked products like powder for medicinal use and carved products were designed precisely to avoid a trade scenario in which the risk of laundering illegal horn into legal supply chains would be high and traceability would be impossible.

There would also be a high likelihood that customs officers at O.R. Tambo International Airport and other airports, seaports, and border crossings would be faced

Below: China Customs Anti-Smuggling Bureau officers using a scanner to detect microchips in seized rhino horn.



with a constant stream of illegal exports, both by unwitting tourists trying to bring rhino horn souvenirs back to their home countries and traffickers taking advantage of the readily available rhino horn for resale on the black market. This phenomenon has been well-documented for other parts and products of threatened species. For instance, ivory sourced from Japan's legal domestic market is regularly seized at ports of entry in countries like China that have banned trade in ivory.⁴⁰

It is unclear why South Africa, including the private venture Rhinomics, appears to be rushing toward unleashing domestic trade in rhino horn without applying the same level of caution it has taken when considering whether to support proposals for international rhino horn trade. According to the Policy Position on the Sustainable Use of Elephant, Lion, Leopard and Rhinoceros, South Africa has adopted a formal position that it will not support a CITES proposal to legalize international rhino horn trade as long as there has been insufficient progress on implementing a suite of requirements related to law enforcement, community empowerment, biological management, responsible legislative provisions and effective implementation, and demand management/reduction.⁴¹ South Africa has yet to fully implement the requirements in any of these five areas, which should – at the bare minimum – be a

prerequisite before any serious consideration of developing a domestic rhino horn trade scheme.

Finally, the creation of a domestic rhino horn market in South Africa would severely undermine the CITES prohibition on international trade in rhino horn and would directly contravene CITES Resolution Conf. 9.14 (Rev. CoP19), which urges parties to reduce the use and consumption of rhino horn. CITES Parties have consistently recognized the threats that domestic markets for Appendix I-listed species pose to the survival of threatened species in the wild, with CITES resolutions on elephants, Asian big cats, and pangolins all calling for the closure of domestic markets in the parts and products of these species that contribute to poaching or illegal trade. In the past, the CITES resolution on rhinos also called explicitly for the closure of domestic rhino horn markets, but this provision was removed in 1994 after heavy lobbying by South Africa and other pro-trade Parties. An attempt by Kenya to restore language to Resolution Conf. 9.14 calling for the closure of rhino horn markets at CITES CoP18 in 2019 was rejected once again after fierce opposition from South Africa, Namibia, and Zimbabwe.

Below: Juvenile southern white rhinoceros in Hluhluwe-iMfolozi Park, South Africa.



CONCLUSION

The current rhino poaching crisis has stretched on for nearly two decades. The financial burden associated with managing and protecting rhino populations is substantial, and the resource concerns expressed by those responsible for safeguarding rhinos from poaching and illegal trade are real. They cannot be dismissed. Indeed, they must be urgently addressed.

However, the history and evidence overwhelmingly indicate that rhino horn trade is not the answer. Stimulating demand to fuel a commercial rhino horn industry, as South Africa is considering, will only lead to more illegal trade and more poaching pressure for the world's rhinos, from the grasslands of Kenya to the jungles of Indonesia.

There has never been a proposed rhino horn trade scheme that would successfully address risks related to demand, traceability, sustainability, corruption, and illegal trade. Intentionally generating new demand to support trade would trigger a renewed poaching surge. Pro-trade advocates will undoubtedly argue that because this is a “domestic” issue input from others can be rejected; the reality is that a legal domestic rhino horn market in South Africa, especially one that seeks to attract foreign consumers, will have global enforcement and conservation repercussions.

South Africa should abandon plans to build a domestic rhino horn market, and instead fully embrace collective efforts to implement the CITES ban on commercial rhino horn trade and prioritize eliminating the systemic drivers of rhino poaching and trafficking: organized crime, corruption, poor-governance, and demand. The international community also has a responsibility to provide the necessary funds to protect rhinos from immediate threats, while working with South Africa and other countries affected by rhino poaching and illegal trade to establish sustainable, long-term funding mechanisms.

Though challenges remain, major progress has been made for rhino conservation over the past 15 years. Improved legislation, enhanced enforcement, increased international collaboration, and dedicated behavior-change campaigns are paying off, although more work remains to be done. If South Africa presses ahead with its domestic trade plans – ignoring the lessons of the past and dismissing the risk of unleashing an out of control demand – it will be the wild rhinos of Africa and Asia that pay the price.

RECOMMENDATIONS

FOR CITES SC78:

- Request that South Africa share information on any plans, including private sector initiatives, to establish a domestic commercial rhino horn market and industry, including how these processes will avoid an increase in demand, illegal killing, and enforcement complications, to the Secretariat for inclusion in its report to CoP20.
- Recommend that CoP20 amend Resolution Conf. 9.14 (Rev. CoP19) on *Conservation of and trade in African and Asian rhinoceroses* to urge Parties to close domestic rhino horn markets that contribute to poaching or illegal trade.

FOR SOUTH AFRICA:

- Remove all provisions in support of a domestic rhino horn trade scheme from the final versions of the National Biodiversity Economy Strategy and the Biodiversity Management Plan for Black Rhinoceros and White Rhinoceros in South Africa.
- Reissue the domestic rhino horn trade regulations and special prohibited activities for rhino horn as a matter of urgency.
- Disclose details about any formal or informal partnership with Rhinomics.

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