

Amboseli Elephant Research Project
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To: US Fish & Wildlife Service, International Affairs
Division of Management Authority, Branch of Permits
Date: 24 June 2003

Re: Environmental Assessment for the import of 11 African Elephants from Swaziland

We, the undersigned, form a group of elephant researchers working together to study elephants in the wild. The Amboseli Elephant Research Project strives to create, maintain, and make available an unparalleled body of knowledge on a single, long-lived mammal species--the African elephant. The data bank is based on 30+ years of research on a relatively undisturbed, free-ranging population of elephants inhabiting the Amboseli ecosystem. One of our main aims is to produce published results, which provide base-line information on elephant biology to scientists and to relevant authorities responsible for the conservation and management of African elephants throughout their range.

The combined experience of the signatories to this statement represents over 200 years of research and conservation activities involving free-ranging, wild African elephants. We are the acknowledged leading experts in the field and as such we feel that we must comment on the permit application to import 11 African elephants from Swaziland to the US.

Our colleague Keith Lindsay, who has expertise in feeding ecology and habitat use of African elephants, will comment on the ecological aspects of the assessment. In this letter we would like to raise a number of other questions. First, we would like to address the issue of the management actions that have been taken in Swaziland in relation to elephants. According to Ted Reilly's statement, there are currently 36 elephants (not 38 as stated in the USFW assessment) in the whole country and we are told that 11 of these elephants have to be killed or removed in order to achieve the management status that has been deemed desirable for these protected areas. This would leave 25 elephants in the two protected areas. We have been told that there is a target of 20 adults for both areas. There is confusion about whether this means 20 adults in each of the protected areas or 10 in each.

Whichever the answer is, the question we raise is why were an additional 19 elephants imported into Swaziland in 1994? The first group of 18 elephants were

imported in 1987. If the target was 20 or even 40 why did they not allow those calves to grow up and breed and form the basis of the two herds. The information provided indicates that the calves came from several areas of Kruger and thus there was no concern about inbreeding. Now only nine years after the additional 19 were brought in we are being told that there are too many elephants in Swaziland and therefore they need to be culled. This argument is being made when there are actually fewer elephants now than there were in 1994 after the second importation.

We are greatly concerned that a precedent is being set that will have profound implications for elephants in Africa. There are now dozens of small public and private reserves in southern Africa, which have been “stocked” with elephant calves from culls and with translocated families from other areas. Most of these reserves apparently took the maximum number of elephants that their area could hold. Many are now saying, as Swaziland is, that they have to kill or sell some of the elephants because of habitat degradation.

This is not conservation of elephants in their natural habitats nor is it a situation of a natural elephant population outgrowing its park or reserve. As far as we can surmise it is more like keeping and breeding elephants with the purpose of selling them. The policy of dumping elephants into private ranches and reserves and then after a few years complaining that there are too many and that they have to cull them is untenable from an ethical and conservation point of view. These elephants are being treated like livestock to be bought, transported, bred, sold, transported again, chained, caged, “trained” with bull hooks and hot wires, sold or traded again when they are not as appealing or they are not breeding or they are too old, and finally ending up in miserable road-side zoos or third-rate circuses.

With our combined experience of over 200 years we would like to examine the environment these 11 elephants will find themselves in from the elephants’ point of view rather than the zoo’s point of view. The assessment discusses “educational opportunities” and “increasing the genetic diversity of the US captive elephant population”. At no point does it discuss the implications for each of these 11 individuals.

Our 30 years of research has shown that elephants live in highly complex societies, that they form life-long bonds, that they are remarkably intelligent, and that they display an amazing array of emotions. The permits, if approved, will allow 11 young elephants to be taken to two zoos in the US. These elephants have already experienced horrendous trauma when their mothers and the rest of their families were killed in the cull. Now they will be captured again, “tamed down”, a process we have now learned is often cruel and painful, and transported thousands of miles to the US. The quality of their lives will be radically different in the zoo environment and the following is one of the most important points we want to make—these elephants will experience more debilitating illnesses and will live shorter lives than elephants living in the wild. The recent RSPCA study of zoo elephants in Europe revealed that the life expectancy for African elephants in captivity is 16 years old. In

Amboseli where there is infant mortality as well as drought, accidents, disease, and most important poaching and spearing, the life expectancy is 41 for females and 24 for males. This is a huge and very significant difference. There is no indication that the situation is better in US zoos. Taking elephants from the wild is not only traumatic for them, it is also detrimental to their health.

What will happen to these 11 elephants down the line? Will the males get too aggressive when they come into musth? Will one of them kill a keeper? Will all the females be able to breed and bring in the money the zoos hope to generate from displaying babies? What if one or two of the females breed but the others do not? Will the non-breeding females be sold or sent to other zoos after they have established relationships with their companions? What happens when the calves grow up? Will they be separated from their mothers and allomothers? Is there any assurance that they will be kept in AZA accredited facilities for the rest of their lives or are these zoos free to sell them or give them to circuses, road-side zoos or private individuals? Can they be exported, say to a circus in Mexico? Once the US Fish and Wildlife Service issues the permit is that the end of any responsibility for the lives of these 11 individuals? These are not rhetorical questions or rare possibilities. There are precedents for each of these sad scenarios already in the management of elephants in US zoos.

In the case of elephants, with their potentially long lives, their ability to communicate their emotional states with numerous vocalizations and displays, their loyalty and care of each other, their gentleness and dignity, we believe the time has come to consider them as sentient beings and not as so much money on the hoof to be captured and sold and displayed for our own use. We should be beyond the exploitation of animals as complex and magnificent as elephants.

We urge US Fish and Wildlife to reconsider the granting of the permits and chose Alternative 2 (No action).

Sincerely,

Dr. Cynthia Moss	AERP	35 years experience
Dr. Harvey Croze	AERP	35 years
Dr. Joyce Poole	AERP & SEVP	28 years
Dr. Keith Lindsay	AERP & EDG	25 years
Dr. Phyllis Lee	Cambridge U. & AERP	21 years
Norah Njiraini	AERP	17 years
Soila Sayialel	AERP	16 years
Dr. Hamisi Mutinda	AERP	13 years
Catherine Sayialel	AERP	<u>11 years</u>
		201 years