We, the undersigned scientists, conservationists, elephant care, animal welfare and policy experts, are strongly opposed to the proposed import of 18 elephants from Swaziland by the Dallas Zoo in Texas, Henry Doorly Zoo in Omaha, Nebraska, and the Sedgwick County Zoo in Wichita, Kansas, for the following reasons:

1. The capture and removal of wild elephants for display in zoos is detrimental to elephants.

The forcible capture and removal of wild elephants from their home ranges and social groups is archaic and unethical. Elephants do not thrive in zoos. Most fail to breed, and an astonishing number of zoo-born elephant calves die young. The overall infant mortality rate for elephants in zoos is a staggering 40 percent – nearly triple the rate of free ranging Asian and African elephants. Those who reach adulthood often display behavioral abnormalities and die of diseases and disabilities caused by captive conditions, such as arthritis and foot disease. Published research shows that bringing elephants into zoos profoundly impacts their health and viability.

2. There is no evidence to show that serious efforts have been made to keep the elephants in Africa.

The Kingdom of Swaziland and the Dallas Zoo and its partners have offered no evidence that they have seriously explored options for relocation of the elephants to other parks or sanctuaries within Africa, nor on what basis other options were rejected — even though in situ relocation offers real conservation value, the promise of minimal harm and distress to the elephants, and the prospect of a natural life. Claims that poaching, habitat loss, and other threats justify relegating these elephants to a lifetime in captivity in a foreign environment are self-serving; used to justify the capture and exports of these animals.

3. Threats to kill the 18 elephants unless permits are issued are unethical and represent outdated wildlife management practices.

Culling as an approach to the management of elephants has been abandoned or put on hold in all countries in southern Africa for two decades. A ban was instituted in South Africa in 1995, and although the ban was lifted in principle in 2008, it has never been resumed, under the strength of public opinion. Other, non-lethal management alternatives, including water point management, corridor creation and translocation are now accepted as best practice. For Swaziland to kill elephants it has decided are surplus would be a return to practices now considered outmoded by modern wildlife managers. Sadly, the zoos are leveraging these threats to facilitate import of the elephants to the United States.

4. The rationale behind the import – to create more room for rhinos – is highly questionable.

The "elephant range" in Swaziland consists mainly of two small fenced enclosures² comprising 6% and 19% of two fenced reserves (Hlane Royal National Park at 142km² and





















¹ Saragusty, J., Hermes, R., Göritz, F., Schmitt, D.L., & Hildebrandt, T.B.(2009) Skewed birth sex ratio and premature mortality in elephants. *Animal Reproduction Science*, 115:247–254

² Blanc, J.J., Barnes, R.F.W., Craig, G.C., Dublin, H.T., Thouless, C.R., Douglas-Hamilton, I., & Hart, J.A. (2007) *African Elephant Status Report 2007: an update from the African Elephant Database*. Occasional

Mkhaya Game Reserve at 65km²). These enclosures contain the country's populations of elephants, numbering 19 and 13 respectively in 2012.³ Essentially, the Swaziland elephants, which were introduced as orphans from culls in Kruger National Park, South Africa, between 1986 and 1994⁴, are kept as a tourist attraction and symbol of national prestige. Since the elephants and their localized impact on vegetation are confined to small areas, it is incorrect to claim that they pose any significant threat to other wildlife, which range more widely in the major portions of the reserves. There is no information publicly available on the numbers of rhinos in the fenced elephant areas, nor any documentation of supposed habitat competition.

















5. Zoos are capturing and importing wild elephants to restock a dwindling zoo elephant inventory, not to conserve the species.

Despite proof of the systemic failures of zoo practices and policies affecting elephants, the zoo industry has become more resolute in seeking out nations abroad from which to plunder elephants to restock zoo exhibits. This practice is an unacceptable consequence of the unnatural conditions provided by zoos, and should not be allowed to continue.

This importation serves no credible conservation purpose. None of the elephants or their offspring will be returned to the wild, the gold standard of conservation. Instead, it is intended to replenish the zoo industry's dwindling African elephant population in the U.S.

Even if the zoos involved in the import would be successful in breeding the captured elephants, it still would not contribute to the conservation of the species. The view of the IUCN SSC Specialist Group for African elephants^{5,6} is that captive breeding makes no effective contribution to conservation, and the group does not endorse the removal of African elephants from the wild for any captive use. Neither of the IUCN Red Data list entries for Asian or African elephants lists captive breeding as necessary conservation measures.

6. The proposed import perpetuates poor conservation practices in Swaziland and promotes poor quality practices in other range States.

In 2003, San Diego Wild Animal Park in California and Lowry Park Zoo in Florida purchased 11 elephants from the Kingdom of Swaziland. Swaziland claimed it had too many elephants, and unless the sale went forward these 11 elephants would be slaughtered. Swaziland and the zoos promised that the money paid for the animals would be used to improve the country's elephant conservation practices and policies. Despite this export, and with a total national population of 35 or fewer elephants, Swaziland officials are again claiming the country has too many elephants and they are again threatening to kill elephants if the proposed sale to

Paper Series of the IUCN Species Survival Commission, No. 33. IUCN/SSC African Elephant Specialist Group, IUCN, Gland, Switzerland, vi+276pp.

removal of African elephants for captive use, IUCN SSC African Elephant Specialist Group. http://cmsdata.iucn.org/downloads/pos_capvuse_en.pdf

⁷ Elephant Database, Provisional African Elephant Population Estimates: update to 31 Dec 2013 http://www.elephantdatabase.org/preview_report/2013_africa_final/Loxodonta_africana/2013/Africa/Southern_Africa/Swaziland

³ http://www.elephantdatabase.org/preview_report/2013_africa_final/Loxodonta_africana/2013/Africa/Southern_Africa/Swaziland

⁴ http://www.biggameparks.org/conserve/

⁵ Statement and resolutions on the role of captive facilities in in situ African elephant conservation, IUCN SSC African Elephant Specialist Group (http://www.african-elephant.org/tools/pdfs/pos_captiv_en.pdf). ⁶ Statement from the African Elephant Specialist Group of the IUCN Species Survival Commission on the

Dallas Zoo and its partners is thwarted.

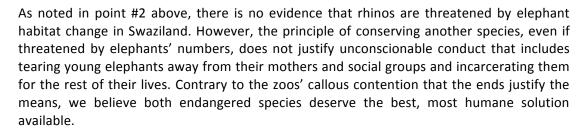
The proposed killing of elephants to maintain small numbers in equally small compounds in Swaziland is not sound conservation, nor is exporting them for display in zoos. It is possible that the 2003 transaction, approved by the U.S. Fish & Wildlife Service, created an incentive for Swaziland to persist in its poor conservation approach.



We are also gravely concerned that sales of elephants, cloaked as conservation, wildlife management, or as "rescues," could encourage other countries to engage in this practice. We have already seen one Association of Zoos and Aquariums (AZA) accredited zoo attempt to disguise its purchase of African elephants from Namibia as a rescue, only to have the import exposed as a commercial transaction.⁸ This fabrication was never publicly condemned by the AZA.



7. A rhino program in Swaziland does not justify the harm caused to the elephants by being captured and exported to zoos.







8. The import is a business transaction.

The zoos involved in the proposed import have invested more than \$25 million in elephant exhibits and now they need elephants to fill them, despite the dire consequences for the elephants in question. Even a small percentage of those millions could make a significant and positive contribution toward the protection of African elephants in their home ranges. That the investment has already been made cannot at the same time be used as an argument for letting an unacceptable practice go forward.





Kimmela Center For Animal Advocad



Conclusion

In summary, the proposed importation has no single redeeming virtue. Certainly, this proposal will not provide any conservation benefit in the U.S. or Swaziland. The zoo industry's tired claim that commercial exhibition of elephants inspires Americans to take conservation action remains unproven and objectively unmeasured. And, for the 18 elephants targeted for importation, it is no exaggeration to conclude that they face a sad, uncertain future.

Elephants are highly intelligent, sensitive, and social. That they suffer in captivity is beyond serious debate. We should always strive for the best, most humane alternative for their care and survival. For the "Swazi 18" this means, at a minimum, remaining on the continent of their birth in conditions of safety and greatest practical freedom. We believe nothing less is acceptable. We call on the Kingdom of Swaziland and the zoos involved in the import to do

⁸ "Namibia: No orphan elephants exported to Mexico." June 11, 2012. http://allafrica.com/stories/201206111695.html

what is in the best interests of these elephants and relocate them to a protected park or sanctuary in Africa.

Signed,

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