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OPEN LETTER BY ELEPHANT SPECIALISTS
Re. Captive elephants and import of wild elephants for captivity

We, the undersigned elephant specialists, who collectively are world-renowned authorities on elephant behavior, sociality, welfare, care and conservation, are strongly opposed to the capture of wild elephants for the purposes of captivity, and indeed to the practice of keeping elephants in zoos. Recent [media reports](#)¹ suggest that US zoos are hoping to import wild-caught juvenile elephants from Zimbabwe, and we are vehemently opposed to the proposed imports, as detailed herein.

Elephants are extremely intelligent, sentient animals, with a highly organized social structure including strong family bonds that can last a lifetime. Young elephants are dependent on their mothers and other family members to acquire necessary social and behavioral skills. Male calves only leave their natal families at 12 to 15 years old and females remain for life. Disruption of this bond is [physically and psychologically traumatic](#)² for both the calves and remaining herds and the negative effects can be severe and lifelong.

Zimbabwe has come under tremendous [global scrutiny](#) for its policy of capturing elephant calves from the wild for sale to ex-situ captive facilities including zoos and safari parks. Since 2012, Zimbabwe has exported 109 wild-caught calves, and a further 35 are reportedly awaiting export. Recently, the Zimbabwean government has been heavily

¹ <https://www.nytimes.com/2019/07/09/magazine/elephants-zoos-swazi-17.html>

² Shannon, G., Slotow, R., Durant, S. M., Sayialel, K. N., Poole, J., Moss, C., & McComb, K. J. F. i. Z. (2013), Effects of social disruption in elephants persist decades after culling. *Frontiers in Zoology*, 10(1): 62. doi:10.1186/1742-9994-10-62

criticized for profiting from these captures and transactions by local civil society in Zimbabwe. A [CNN news article](#) has scrutinized these pending transfers.³ Zimbabwean NGOs - People and Earth Solidarity Law Network (PESLawyers), Veterinarians for Animal Welfare Zimbabwe (VAWZ), Sibanye Animal Welfare and Conservancy Trust (SAWC), Voices for African Wildlife (VFAW), Tikobane Trust, Zimbabwe Youth Biodiversity Network (ZYBN) and Zimbabwe Elephants Foundation (ZEF) - have [petitioned](#)⁴ the Zimbabwean Government on Zimbabwe's trade in wild elephants and PESLawyers launched an application for an [interdict](#)⁵ against the export of the current calves being held in Hwange bomas with the High Court of Zimbabwe.

Letters of opposition in a long-standing campaign regarding the wild captures and export have been directed to the Zimbabwean government:

- In 2010 - approximately [60 representatives](#)⁶ including elephant specialists co-signed a letter submitted by ElephantVoices
- In 2014 - [The Amboseli Trust for Elephants, Born Free, ElephantVoices and Performing Animal Welfare Society \(PAWS\)](#)⁷
- In 2015 – [letter and public statements](#)⁸ by several dozen scientists, animal welfare and conservation organizations
- In 2016 – Two dozen member organizations of [Species Survival Network](#)⁹
- In 2018 – approximately [35 representatives](#)¹⁰ including elephant specialists co-signed a letter submitted by Humane Society International – Africa

As public sentiment opposing the capture and export of the wild caught elephants to zoos grows, several petitions have been launched, including [Care2](#) (286,809 signatures), [change.org](#) (446,897 signatures), [Network for Animals](#) (15,866 signatures), [Care2/IFAW](#) (70,783 signatures) and [Humane Society International](#) (108,016 signatures).

A 2017 [expose](#)¹¹ revealed damning undercover footage during capture, confirming concerns that the elephants are subjected to harsh and cruel treatment to force them to submit to human dominance. In February 2019, [further video footage](#) of young calves (some as young as two years) showed the youngsters frantically pacing around the Hwange pens, with some showing signs of stress such as temporal streaming (dark streaks of secretion down the side of the face from the temporal gland) and others demonstrating wide-eyed, ears-splayed, chin-up defensive postures. According to a [paper](#)¹² [submitted by the Governments of Burkina Faso and Niger](#), presented at the 69th meeting of the Standing Committee of the Convention on International Trade in Endangered Species (CITES SC69) in Geneva (Switzerland), 27 November - 1 December 2017, “*captured calves transported to holding facilities suffer depression, lethargy, anxiety, increased stress, intra-specific aggression, and a diminished or non-existent appetite, sometimes resulting in death or contributing to*

³ <https://edition.cnn.com/2019/05/14/africa/zimbabwe-sells-elephants-intl/index.html>

⁴ https://drive.google.com/file/d/15V9faVzTvTle_4uCBS9CW7u3wty0LbZC/view

⁵ https://drive.google.com/open?id=1z000uQ-7Myt3ouPr_K3oLWuGMMy2pc6iR

⁶ <https://drive.google.com/open?id=1zERtG3STs9lhuhyE8III1Ff1JlppcMX3>

⁷ <https://drive.google.com/open?id=1L6p9prnVHKo6iXKuLVeCOPH6wOwNO2tU>

⁸ <https://drive.google.com/open?id=10L8FhLAVxCos7oOs5PFOgynBfk8cV-D5>

⁹ https://drive.google.com/open?id=1T_GyOyd58KCgWA-XfDhpVbChOkESIyGL

¹⁰ <https://drive.google.com/open?id=1A-eFLJzHqSTkAvc1jTQR4joHWve-a4eQ>

¹¹ <https://www.theguardian.com/environment/2017/oct/03/exclusive-footage-shows-young-elephants-being-captured-in-zimbabwe-for-chinese-zoos>

¹² <https://cites.org/sites/default/files/eng/com/sc/69/inf/E-SC69-Inf-36.pdf>

premature mortality. Training in temporary facilities may include food and/or light deprivation, restriction of movement, forcing the animal into an uncomfortable position for extended periods of time, and regular beatings”.

In 2003, the San Diego Wild Animal Park in California and the Lowry Park Zoo in Florida purchased 11 wild elephants from Swaziland. In 2016, another 18 wild-caught elephants were imported from Swaziland to the US to Dallas Zoo in Texas, Henry Doorly Zoo in Omaha, Nebraska, and the Sedgwick County Zoo in Wichita, Kansas. Both imports were met with severe criticism and many testimonies against the capture and import were submitted, including:

- a joint letter co-signed by [80 representatives](#)¹³
- a letter of opposition from the [Humane Society of the United States and Humane Society International](#)¹⁴
- a letter of opposition from the [Animal Legal Defense Fund \(ALDF\), People for the Ethical Treatment of Animals \(PETA\), Performing Animal Welfare Society \(PAWS\) and captive wildlife attorney Deborah Robinson, Esq.](#)¹⁵
- a letter of opposition from the [Animal Welfare Institute and the Center for Biological Diversity](#)¹⁶.

CITES SC69 Inf.Doc.36 records that during the 2016 export, one juvenile died prior to transfer and that the group included a pregnant female. A further juvenile male died under anaesthesia in September 2017.¹⁷ The pregnant female was in late pregnancy and gave birth shortly after arrival. This constitutes a violation of the International Air Transport Association (IATA) guidelines and the [Lacey Act Regulations for Humane and Healthful Transport of Mammals](#)¹⁸ and therefore CITES¹⁹. These concerns were [submitted to the Department](#)²⁰ by Humane Society of the United States and Humane Society International in June 2016.

An [in-depth factsheet](#)²¹ was specifically prepared addressing - amongst other issues - the detriment to the captured elephants, the poor practice and the lack of conservation value that zoos provide. A substantial [ElephantVoices database](#)²² hosting selected statements and testimonies in regard to elephant welfare in zoos, circuses and wild captures for captivity exists and echoes the position of the authors.

¹³ <http://tinyurl.com/nzp8y6o>

¹⁴ https://drive.google.com/open?id=1vms52lAKf5d_uBst5HjFKn9L4oEi-Ms8

¹⁵ <https://www.mediapeta.com/peta/PDF/CommentsinOppositiontoPRT-52849B.pdf>

¹⁶ <https://awionline.org/sites/default/files/uploads/documents/AWI-CBD-SwazilandElephants-CommentLetter-11232015.pdf>

¹⁷ CITES SC69, Inf.Doc.36, p.7.

¹⁸ <https://www.ecfr.gov/cgi-bin/text-idx?rgn=div5;node=50%3A1.0.1.2.8#sp50.1.14.j>

¹⁹ CITES Articles III, IV, V, VII and VIII and CITES Resolution Conf. 10.21 (Rev. CoP16), paragraph 2 d): <https://www.cites.org/sites/default/files/document/E-Res-10-21-R16.pdf>;

<https://www.cites.org/eng/disc/text.php>

²⁰ https://drive.google.com/open?id=16fSubNfFWjppjny_psEK-y5EMiDG-e-M

²¹ <http://www.elephantvoices.org/phocadownload/FAQs-Swaziland-elephant-export-publ28Oct2015.pdf>

²² <https://www.elephantvoices.org/multimedia-resources/statements-a-testimonies.html>

The International Union for Conservation of Nature’s Species Survival Commission [African Elephant Specialist Group](#)²³ opposes the removal of African elephants from the wild for any captive use. This position was reaffirmed at the group’s meeting in Pretoria, South Africa in July 2019. In 2016 at 17th Conference of the Parties (CoP17) of CITES, the [African Elephant Coalition \(AEC\) submitted a proposal](#)²⁴ “to restrict the trade in live African elephants outside their natural range, including export to zoos and other captive facilities overseas”, adding that “This proposal would be consistent with IUCN findings that the removal of African elephants from the wild for captive use has no direct benefit for their conservation. Live trade disrupts wild populations and leads to high rates of mortality and disease in captivity”. At a meeting in Nairobi this year, the [AEC reiterated its position](#)²⁵ calling for an end to the export of live elephants to zoos and other captive facilities, and once again submitted a proposal to this end for CoP18.

An argument often put forward by countries wishing to supply live African elephants is that live export alleviates local population pressure and spares elephants from being culled. In reality, such captures do little to reduce populations at the local scale and the increased risk of aggression toward people posed by antagonized elephants is likely to negate any gains made in reducing conflict. Other choices exist:

- a) Relocation of elephants to other protected parks within the elephant’s natural range (national or international).
- b) Range expansion of current protected areas.
- c) Employment of immunocontraceptive fertility control in females. In South Africa, [immunocontraception](#)²⁶ programmes have been deployed for nearly 20 years, and have been demonstrated as an effective tool for population control with more than 900 elephant cows treated in 27 reserves across the country.

We contend that the extensive references and supplementary materials submitted herewith support our position that elephants fare poorly in zoos and that the capture and relocation of wild African elephants to captivity should be prohibited. In summary:

a) Welfare in captivity:

It is well documented that some animal species may cope reasonably well to life in captivity, but some do not. Elephants demonstrably fall into the latter category, [adapting poorly to life in captive facilities](#)²⁷. They have shorter lifespans in captivity than in wild populations and they breed poorly, if at all, in captivity. As a highly social, cognitive and intelligent animal,

²³ IUCN SSC AfESG: Statement on the removal of African elephants for captive use. Mokuti Lodge, Namibia, 2003. <https://www.iucn.org/ssc-groups/mammals/african-elephant-specialist-group/afesg-statements/removal-african-elephants-captive-use>

²⁴ <https://cites.org/sites/default/files/eng/cop/17/WorkingDocs/ECOP17-57-04.pdf>

²⁵ https://www.africanelephantcoalition.org/wp-content/uploads/2019/02/FINAL-15-2019-AEC-press-statement_EN.pdf

²⁶ Bertschinger, H., Delsink, A., van Altena, J. & Kirkpatrick, J. (2018) Porcine zona pellucida vaccine immunocontraception of African elephant (*Loxodonta africana*) cows: A review of 22 years of research. *Bothalia: African Biodiversity & Conservation Biology*, 48(2): 1-8. doi:<https://doi.org/10.4102/abc.v48i2.2324>.

²⁷ Clubb R. & Mason G. (2002) *A Review of the Welfare of Zoo Elephants in Europe*. RSPCA Report; University of Oxford.

Clubb R., Rowcliffe M., Lee Ph., Mar K.U., Moss C. & Mason G. (2009) Compromised Survivorship in Zoo Elephants. *Science*, 322: 1649. DOI: 10.1126/science.1164298

elephants require adequate space to express natural foraging behavior and to form natural social groups of their own choosing, which zoos cannot provide. The forcible capture and removal of wild elephants from their home ranges and social groups is archaic and unethical. The overall infant mortality rate for elephants in zoos is a staggering 40 percent²⁸ – nearly triple the rate of free-ranging Asian and African elephants. Those individuals who reach adulthood do not have the opportunity to express species-typical behavior, often display behavioral abnormalities, and tend to 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 physical and psychological health and viability. As such, there has been a ca. 10% long-term decline of elephants in zoos in general. There is a global trend for modern zoos to refrain from housing elephants because their significant physiological, behavioral and social needs cannot be met. According to the European Elephant Group, currently 155 zoos have closed their elephant facilities²⁹, as zoo directors realize that they cannot provide elephants with adequate facilities.

b) Zoos are capturing and importing wild elephants to restock a dwindling zoo elephant inventory, not to conserve the species:

The letter submitted by [80 representatives](#) regarding the Swaziland imports refers: “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 US. 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. Neither of the IUCN Red Data list entries for Asian or African elephants lists captive breeding as necessary conservation measures”.

There is a global trend towards recognizing that the specific and extensive needs of elephants cannot be adequately met in captivity. We urge the USFWS to prohibit the import of wild-caught elephants to captivity in US facilities. We also call on AZA to take a position of no imports of wild-caught elephants.

Yours sincerely,

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²⁸ 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

²⁹ https://drive.google.com/open?id=1Fa_oQrOcYVnrQDpp1cZiFj1YdDQr5pxc

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