

**UNITED REPUBLIC OF TANZANIA
MINISTRY OF NATURAL RESOURCES AND TOURISM**



**ELEPHANT HUNTING IN TANZANIA
A PERSPECTIVE OF TRANSBOUNDARY ECOSYSTEM**

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I. INTRODUCTION

Tanzania's wildlife is one of the richest and most diversified in Africa with a number of endemic species (species confined to a single given area) estimated to range from 400-3000 (URT 2019). It is home to 404 mammal species, of which 45 are endemic; 1103 species of birds (37 endemic); 207 amphibians (86 endemic) and 360 reptiles (85 endemic) (ASM 2020; IUCN ESARO 2020; Butler 2024; WCS 2023;). The country hosts 20% of the species of Africa's large mammal population including the big five (IUCN ESARO 2020) – lion, elephant, buffalo, leopard and black rhino. It has the 11th-highest total number of IUCN Red Listed threatened species in the world (WCS 2023). The most recent data indicates that some 1,591 species are listed as Critically Endangered, Endangered, and Vulnerable – making Tanzania home to the most threatened biodiversity of any African country (IUCN 2024). Globally, Tanzania ranks 15th in mammal species, 12th in birds, 21st in amphibians, and 25th in reptiles (Butler 2024).

Tanzania has maintained a high population of wildlife species due to its historical commitment and efforts devoted to conservation along with the decision to set aside a large tract of land as protected areas under different categories. The core wildlife protected areas (PAs) covers about 307,800 km² -equivalent to 32.5% of her mainland territory (942,832km²) and community Wildlife Management Areas (WMAs) and Open areas (village lands used for wildlife conservation) occupies 60,687 km²- equivalent to 6.4%. Further, the National Forest Reserves (NFRs) and Forest Nature Reserves (FNRs) occupy about 92,483.44km² and 9,488.77km², respectively. These PAs include 21 National Parks, the Ngorongoro Conservation Area, 29 Game Reserves (GRs), 23 Game Controlled Areas (GCAs), 39 WMAs, 464 FNRs and 23 NFRs. Some of the areas and wetlands have international recognition as World Heritage Sites (4), Man and Biosphere Reserves (5), Ramsar Sites (4), and UNESCO Global Geopark (1). Out of 25 globally known biodiversity hotspots, six (24%) are located in Tanzania.

Wildlife plays a key component in the country's economy, whereby tourism which is 80% wildlife-based account for 17.2% of GDP, 25% of forex earnings and over 1.6 million direct and indirect jobs. Hunting tourism is one of the major tourism products in Tanzania which is conducted in areas with about 260,677km² (equivalent to 27.65% of Tanzania's mainland territory). It entails a strategy of offering high-quality experiences and low-volume tourism. It is generally conducted in areas characterized by dense vegetation, challenging terrains, remote locations, mostly highly tsetse-infested flies and limited infrastructure which are not suitable for photographic tourism. Hunting activities occur in hunting blocks located outside

the national parks and Ngorongoro Conservation Area. These areas are GRs, GCAs, OAs, NFRs and WMAs (Table 01).

Table 01: Hunting blocks and their categories

S/ N	PA Category	Block Category				Total	%
		I	II	III	UC		
1	Game Reserve	15	33	10	0	58	53
2	Game Controlled Areas	4	9	6	3	22	20
3	Open Areas	2	13	6	9	30	27
	Total	21	55	22	12	110	

NB: UC are blocks that need rehabilitation

The revenue generated from hunting tourism plays a crucial role in funding essential conservation initiatives, such as anti-poaching operations, wildlife conservation programs and supporting the adjacent communities' livelihood. Besides generating revenue, hunting tourism plays a crucial role in protecting priceless wildlife resources and associated habitats in the hunting concessions. These benefits provide the strongest justification for land use to remain reserved for wildlife rather than other land uses incompatible with conservation.

Therefore, this paper addresses the policy, legal, and regulatory framework underpinning trophy hunting in Tanzania, the benefits of safari hunting, the challenges facing trophy hunting and the position of Tanzania regarding the false allegations of overhunting of “*Amboseli elephants*” in the northern part of Tanzania.

2. POLICY, LEGAL AND REGULATORY FRAMEWORK FOR ELEPHANT HUNTING

Hunting tourism in Tanzania is part of the conservation strategy and is underpinned by the Wildlife Policy of Tanzania 2007, the Wildlife Conservation Act No. 5 of 2009 RE 2022, and the Wildlife Conservation (Tourist Hunting) Regulations of 2015, with subsequent amendments in 2017, 2019, and 2020. The administration and management of hunting tourism in Tanzania are guided by four key principles: the responsibility principle, emphasizing the sustainable, efficient, and equitable use of resources; the precautionary principle, which prevents the lack of scientific information from impeding conservation and management measures; the adaptive management principle, promoting flexibility and learning from

experience; and the participatory principle, recognizing the importance of involving stakeholders in decision-making processes.

Hunting of elephants in Tanzania is well regulated as provided for under the Wildlife Conservation (Tourist Hunting) Regulations, 2015 as amended in 2017, 2019, and 2020; the hunting of elephants is allowed for old male bulls that possess tusks weighing 20 kg or more or measuring 160 cm or above. This regulation ensures that hunting practices does not have a negative impact on the elephant population.

Elephant hunting complies with the provisions of the Convention on International Trade in Endangered Species of Wild Fauna and Flora (CITES), which Tanzania ratified and has remained firm to ensure effective enforcement since 1980. Tanzania and the Democratic Republic of Congo are the only two countries in the East Africa Community (EAC) that have achieved full compliance with CITES and their National Legislations are in category I of CITES. As part of the implementation of CITES, Tanzania successfully developed and implemented the National Ivory Action Plan (2014-2018) and, consequently, exited from reporting process as provided under the Resolution Conf. 10.10 (Rev. CoP17). Further, Tanzania proved that elephant hunting does not have a detrimental effect on the elephant population through the Non-Detrimental Findings developed in 2016 and has recently launched the New Elephant Management Plan 2023 – 2033 to ensure that elephant is properly managed and sustainably utilized.

Tanzania is also part of regional and bilateral agreements such as the East African Community (EAC), the Lusaka Agreement Task Force, the Southern African Development Community (SADC), and the Tourism Cooperation Agreement between the Governments of the Republic of Kenya and the United Republic of Tanzania of 1985.

The issuance of permits and close monitoring of clients in the field greatly regulate the hunting of elephants and other species. Professional hunters and highly qualified armed rangers accompany hunting clients to ensure compliance and their safety. The trophy register book records each hunt, detailing the hunting location, trophy size, and time.

3. ELEPHANT HUNTING QUOTA SETTING

Tanzania has established a national hunting quota of 100 tusks as trophies from 50 animals (bulls). The quota of 50 individuals is a very conservative, established based on the

precautionary principles and represents 0.083%, of the current population of 60,000 elephants, which is far below the 0.3% of the minimum off-take. Minimum off-take practice, maintain a high level of trophy quality and ensure that only mature male individuals past their breeding age are hunted.

The established National Wildlife Utilization Quota Setting Manual guides the setting of hunting quotas. According to the manual, the hunting quotas are based on data and other relevant information available in terms of average population size, natural breeding history, recruitment rate, and population estimates, which are partly derived from regularly conducted censuses (large mammals), research work and indices as may be reflected in various reports by field personnel, as well as harvesting success rate.

The Quota Allocation Advisory Committee, comprised of researchers, elephant biologists, site managers, and the CITES Management and Scientific Authority, determines the quotas annually. The Committee receives input on wildlife usage and population status from various stakeholders and meets once a year. The Committee sets the elephant quota at levels that do not jeopardize the survival of the species.

In the period of six years (6) years from 2018 to 2023, a quota of 300 elephant bulls was issued, but only 38 elephants were hunted (13% quota utilization) (Table 2). This level is negligible in biological terms but still generates revenues crucial for conservation and support to community livelihood. Quota utilization fluctuates due to trophy import moratoriums caused by anti-hunting campaigns in countries that form major markets for hunting tourism. Following these campaigns, which precipitated a prolonged moratorium, however, the utilization of elephant quota remained on average of 13% for a period of six years.

Table 2: Elephant hunted in the six major elephant ecosystems

S/N	Ecosystem	Quota	Year						Total	
			2018	2019	2020	2021	2022	2023	Hunte	%
1	Nyerere-Selous-Mikumi and surroundings	16	1	0	0	0	1	0	2	5
2	Ruaha-Rungwa and surroundings	10	0	0	0	1	1	2	4	11
3	Katavi-Rukwa and surroundings	7	0	0	1	0	1	0	2	5
4	Tarangire-Manyara and surroundings	5	0	0	0	0	1	3	4	11
5	Malagarasi-Moyovosi and surroundings	4	0	0	0	0	0	0	0	0
6	Serengeti and surroundings	8	2	5	5	4	5	5	26	68
Total		50	3	5	6	5	9	10	38	100

Elephant hunting plays a crucial role in the broader framework of protected area management, preventing abandonment or conversion of hunting areas to agricultural farms while simultaneously seeking to improve the well-being of communities living alongside wildlife.

4. BENEFITS OF HUNTING TOURISM

4.1 Hunting Improves Population Gene Diversity for Elephant

Reproduction in male elephants is known to be active from the age of 25 years when the elephant sired calves. From the age of 30 or more, elephant bulls rely on musth as their main reproductive strategy, whereas at this time, it enters into competition with other bulls for access of females for mating. Various studies have indicated that when musth and non-musth bulls compete, non-musth bulls rarely manage to mate with females. However, when two musth bulls compete for access to females, body size generally determines dominance (Poole 1989) rather than tusk size. This suggests that large-tusked elephants are no more likely to be successful in sexual competition than a counterpart of similar age. While tusks grow fast with age, particularly in terms of increasing weight and circumference (Spinage 1994; Whyte and Hall-Martin 2018), this does not necessarily mean that the larger tusker has more chance of mating than the lesser tusker.

Elephants live like any other organism; the longer they live, the more they have a chance to mate in the group or family, but this does not mean hunting old bulls has lost its contribution in larger tusk gene to the next generation as they start siring calves at the age of 25 years. Small or medium-sized tuskers likely can sire calves with larger tuskers, as they carry alleles of larger tuskers, which they can pass on to the next generation. Given that the likelihood of hunting elephants with large tusks increases after 50 years and these elephants have been around for at least 25 years, it is believed that bulls have significantly contributed to gene diversity, including the traits of larger tuskers.

Retaining a few bulls of large body sizes that dominate the breeding of the next generation of elephants, suppressing upcoming young musth bulls from accessing mating, reducing the chance of increasing gene diversity, and creating a possible weak population of almost homogeneous individuals. The general rule of thumb in breeding is to bring in new bulls to improve the population's health. Possibly, retaining the same large bull in the family for a longer period not only reduces the chance for younger bulls to have a chance to mate but also may increase the chance of genetic depression in the population.

Therefore, hunting large bulls does not remove certain traits in the population. In this case, larger tuskers, rather, in their absence, generally improve several traits, including larger tuskers in the population, by allowing mid-age musth bulls and non-musth bulls to access mating. A paternity study in Addo elephants indicated that old musth males did not dominate the paternity of the population (Whitehouse and Harley 2002) by allowing opportunity breeders. Other genetic studies on elephants indicated that few old males normally sired a significant number of calves due to their body size dominance and long periods of musth (Rasmussen et al. 2008). This implies that hunting plays an important role in regulating gene diversity in such a population and creating a healthy population.

4.2 Mitigation of Human Elephant Conflict

Tanzania recognizes Human Elephant Conflicts (HEC) as one of the major conservation challenges. HEC takes place when the need and behavior of elephant negatively impact the goals of humans or when the goals of humans negatively impact the needs of elephant. Incidences of HEC are highly pronounced in areas where human activities overlap with areas preferred by elephants. Between 2018 and 2023, elephants killed at least 260 people and injured 180 others. Similarly, a total of **78,371.10** acres with variety of crops were raided by wildlife, of which 99% (**77,654.60 acres**) of the damage was caused by elephants.

The increase in free movement of elephants between transboundary ecosystems e.g. Tsavo – Mkomazi ecosystem, Selous – Niassa, Serengeti – Maasai Mara with more stays in the protected areas within Tanzania, indicates the highest status of protection and habitat management. A recent survey indicates that the number of elephants in Mkomazi National Park has increased from around 59 individuals in April 2014 to more than 1200 in May, 2019. The expansion of agriculture, settlements and fencing along the southern boundary of Amboseli National Park and its adjoining conservancies has restricted elephant movement, and has contributed to this increase. The elephants have, thus, become residents in Mkomazi National Park and its surrounding ecosystems. Elephants have killed people and destroyed farms as a result.

Efforts to address HEC in Tanzania have resulted in the killing of 36 elephants between 2018/19 and 2022/23 for attacking people (**Figure 1**). Most of the killings occurred in the Nyerere-Selous-Mikumi ecosystem, Ruaha-Rungwa ecosystem, and the Serengeti ecosystem. However, the Government has no specific quota for problematic and nuisance elephants. When an elephant poses a threat to public safety, the government hunts it as a problem animal and either kills, translocate, or pushes it back into PAs.

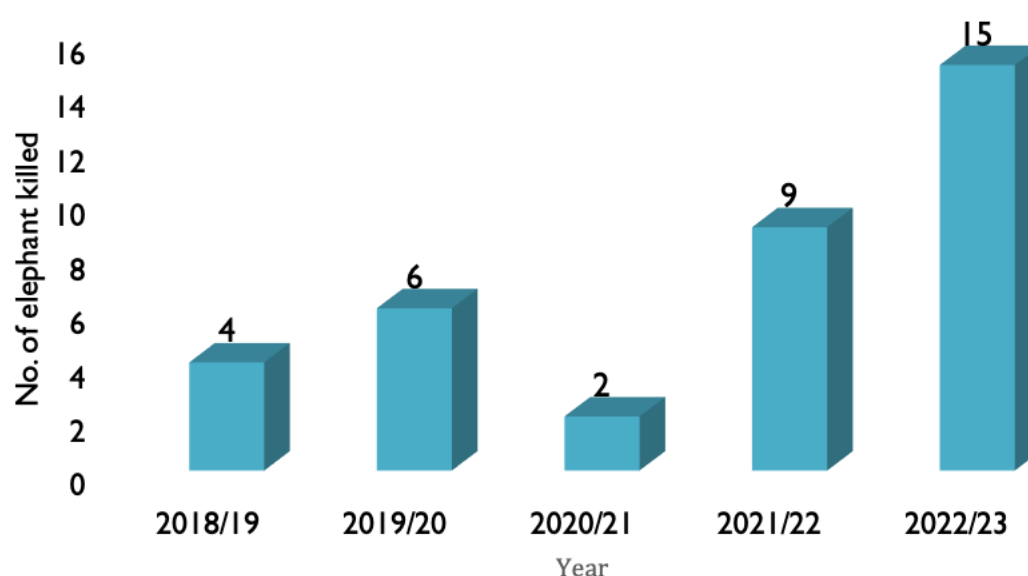


Figure 1: Number of elephants killed as part of Problem animal control

In these areas, elephant hunting not only serves as a management tool to enhance human elephant coexistence but also as a survival strategy to prevent this species from becoming problem animals. Revenue accrued from elephant hunting supports community development projects and conservation initiatives, unlike when they are killed as problem animals and retaliation.

Therefore, hunting serves as a tool to minimize the problematic elephants and generates funds needed for elephant conservation and payment of the consolation to victims of HECs. For example, the period ranging between 2018 to 2023, the Government paid **TZS 7,552,900,750.00** to victims of HEC. A very limited and sustainable off take of huntable wildlife species, including elephant generates these funds. Tanzania is one of the few countries that console the victims of human wildlife conflicts, thanks to hunting tourism, which is the sole source of funds for this model.

4.3 Contribution to Community Livelihood

Hunting operators provides returns to local communities in various forms, including direct income from beneficiary schemes, infrastructure development, support for community projects, local entrepreneurs and provision of jobs. Hunting companies offer direct and indirect jobs to local communities in various forms, such as casual laborers for the maintenance and upkeep of roads, the collection of materials for the construction of hunting camps, trackers and skimmers. The presence of hunters in camps provides a market for selling souvenirs, vegetables, and fruits to hunting operators. Most of the suppliers of these items come from the communities residing around these hunting blocks. On the other hand, hunting operators provide social services to communities as part of their corporate social responsibility. The services include the supply of water to people and livestock during the dry season, the construction of classrooms, the provision of health care (building of dispensaries, provision of medicine, ambulances), and food to impoverished families.

All these opportunities provide local communities with incentives to value and engage in conservation of wildlife. The government also returns 25% of hunting revenue from game fee generated from Game Reserves and Game Controlled Areas blocks to Districts. Seventy-five percent (75%) of hunting revenue from block fees, 15% from hunting permit fees, and 45% from game fees in hunting blocks located in Wildlife Management Areas (WMAs) are returned to village members of the respective WMAs. District Councils (DCs) receive 15% of the revenue returns from game fees in WMAs blocks. For the past three years (2020/21 to 2022/23) revenue realized from hunting tourism in WMAs was USD **2,546,295**. In areas where alternative land uses have minimal economic value; these returns are vital in sustaining community livelihoods and winning local support for resource conservation and protection.

4.4 Revenue accrued from Hunting Tourism

Hunting tourism is a viable source of revenue in areas outside of National Parks and Ngorongoro Conservation Areas. Despite the global pandemic (COVID19), tourism hunting generated a total of **USD 63.8 million (Figure 2)** between 2018/19 and 2022/23. These revenues are essential in supporting the conservation and habitat protection, mitigating human-wildlife conflicts, and supporting the livelihoods of the adjacent local communities residing in the wildlife-dominated landscapes.

Hunting tourism accounts for **70%** of TAWA's total revenue. Being the major source of income, hunting tourism plays a key role in supporting conservation activities in Game Reserves, Game Controlled Areas, Wildlife Management Areas and all areas with wildlife resources, except in national parks and the Ngorongoro Conservation Area. Mainly, revenue from this source is generated from the payment of annual hunting block fees, hunting permit fees, game-killed fees, trophy handling fees, and annual professional hunter license fees.

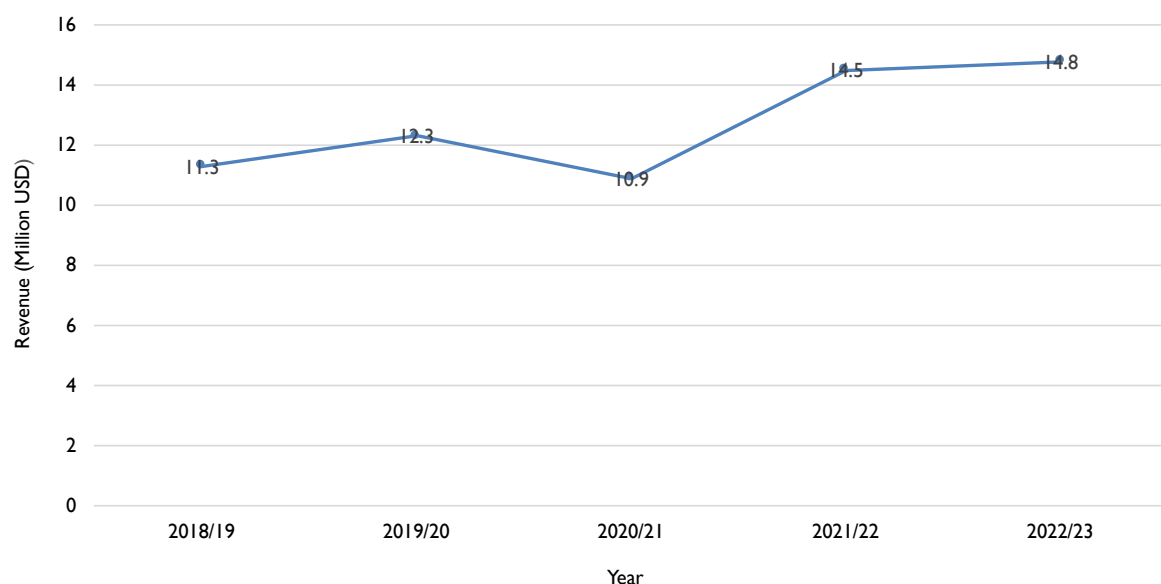


Figure 2: Hunting tourism revenue for a period of five years (2018/19 to 2022/23)

5 CHALLENGES

Despite its unquestionable ecological, environmental, and socioeconomic benefits, tourism hunting in Tanzania is facing numerous challenges, which are likely to undermine the realization of its importance. Some of these challenges include: -

5.1 Encroachment of Hunting Areas

Population increase, expansion of settlements in hunting areas, competing land uses such as agriculture, mining and inversion of by livestock keepers in hunting block has affected the

viability of some hunting block and reduced their ability to attract potential investors due to continued decline in their quality. Assessment conducted by TAWIRI in 2018 revealed that 14 hunting blocks had their quality been depleted and recommended for rehabilitation before being set for allocation. However, the government has continued to implement measures such as assessment and prioritization of important wildlife corridors, support the establishment of WMAs, strengthening anti-poaching and transformation of wildlife sector into paramilitary to rescue these blocks and other PA at large.

5.2 Poaching and Illegal Trade

Poaching and illegal ivory trade are among the drivers of the decline of African savanna elephants in their range areas and remain a serious threat to date. The surge in demand for ivory in the last 15 years has seen elephant populations decline by over 50% in Tanzania (TAWIRI 2015; Thouless et al. 2016), which led to an intensification of law enforcement and intelligence-led anti-poaching operations. Whilst significant progress has been made, poaching for ivory continues to affect the sustainability of hunting as poachers are targeting the same ivory that hunters do. Therefore, combating poaching ranks high in the conservation agenda and the government has launched the National Anti-poaching Strategy 2023 – 2033, aiming to attain zero poaching by 2033.

5.3 Aggressive anti-hunting campaigns

There has been an increase in anti-hunting campaigns around the world, calling for a ban of the import and export of legally hunted trophies. These campaigns are guided by emotions, ideologies, and a lack of information about the importance of hunting to conservation and community livelihood. The false narrative that sustainable and regulated hunting poses a threat to species lacks scientific basis and misleads the world at large. Most campaigners use funds and influential people to push their agenda. Tanzania has continued to work with like-minded organizations in countering those petitions.

6 PETITION TO STOP HUNTING IN TRANSBOUNDARY ECOSYSTEM

Recently, there has been social media outcry over the hunting of elephants in Northern Tanzania, specifically in the west Kilimanjaro areas (Enduimet WMA, Ngaserai OA and Longido GCA). The media campaign, led by animal activist, **Paula Kahumbu**, is petitioning Tanzania to stop hunting of elephant in the northern Tanzania borderland, specifically in Enduimet WMA, Ngaserai Open Area (NARCO), Longido GCA and Lake Natron GCA. The

petition stemmed on the assumption that Amboseli elephants are hunted along the boundary between Kenya and Tanzania and such hunting undermine conservation efforts by Kenya

The petitioners have extended the campaigns to other countries hosting most of the anti-hunting NGOs such as Human Society International (HSI), International Fund for Animal Welfare (IFAW), Born Free Foundation, Species Survival Network, Defenders of Wildlife, Animal Welfare Institute, Amboseli Trust and Jane Goodall Institute. These NGOs through their members in Germany, United Kingdom, France, United States of America have submitted letters through Tanzania embassies abroad pressurizing Tanzania to stop hunting the so called Amboseli Elephants.

Likewise, a publication by Joyce Poole et al., on 27th June 2024, in Science letters titled ‘*Stop elephant hunting in Tanzania borderlands*’, Shola Lawal in New York Times July 2024 titled “*A Ban on Elephant Hunting Has Collapsed. Or Maybe It Never Existed*” and a letter to the President of the United Republic of Tanzania from Senator Steve Cohen, member of the Congress of the US, proposing an *amendment of Tanzania wildlife hunting laws and regulations*; have continued to fuel this unguided and misleading campaign.

7 FACTS ABOUT AMBOSELI WEST KILIMANJARO ELEPHANT POPULATION

Tanzania shares the transboundary ecosystem “Amboseli – West Kilimanjaro with Kenya” and wildlife within this ecosystem move freely between the two countries. Each country has its own policy, law and management plan guiding the conservation, management and sustainable use of wildlife. When animals are in Tanzania are treated in accordance with Tanzania’s laws same as in Kenya. For example, Kenya banned hunting in 1978 and has continued to lobby in the international arena including CITES to put more restrictions on hunting. Much of the lobbying is done by the conservation NGOs from non-user group (animal rights), which are based in Kenya. Therefore, it is important to note the following issues regarding the management of cross-border ecosystems and facts about petitions: -

A: No evidence to prove beyond reasonable doubt that the legally hunted elephants were among the studied individuals by the Amboseli Elephant Research Project: This is because the hunted elephants had no any tracking devices or body marks to prove that they are known by Amboseli elephant researchers; and there was no communication to Tanzanian elephant researchers on crossing of the study animals from

Amboseli to Tanzania, unlike Mara Elephant researchers who frequently communicate with elephant researchers in the Serengeti ecosystem. Therefore, the argument that the legally harvested elephants belong to Kenya has no ground because wildlife in a shared ecosystem belongs to any of the countries where it is found at a specified time. Since hunting was done in Tanzania, it is, therefore, apparent that the hunted elephants belonged to Tanzania. Again, due to lack of facts on the origin of the elephants and the conservation systems, in a letter by Shola, we quote:

“Five bulls from the area around a Kenyan wildlife reserve have been shot and killed in Tanzania in recent months” is a fantasy. The fact is that permitted hunters in Tanzania cannot hunt elephants either under research or beyond any national borders including Kenya. This is because hunting companies and Professional Hunters in Tanzania adhere to regulations and hunting ethics (Wildlife Conservation (Tourist hunting) Regulations 2015, with subsequent amendments in 2017; 2019 and 2020);

B: Scientifically, there is no cross-border elephant population: rather they are categorized as either ‘Tanzania’ or ‘Kenya’ population. We have been jointly counting elephants for many years and each country gives independent results. Joint aerial census recognizes two categories of elephant populations depending on the country where the animal is sighted. Therefore, is either a lack of knowledge, misinterpretation, or a deliberate intention among the petitioners to mislead the international community about Tanzania-Kenya transboundary elephant population management.

C: No state can claim ownership of elephants that have crossed international boundaries: - Refer the UN Permanent Principle of National Sovereignty over Natural Resources (sovereignty over control, use, or disposal of natural resources).. When elephants are in Tanzania, their management will be based on the Tanzania Wildlife Policy of 2007, the Wildlife Conservation Act No. 5 of 2009, Tourist Hunting Regulations and other guidelines. Likewise, when elephants are in Kenya, their management will be based on the Wildlife Policy of Kenya and other Kenyan legislations. Research findings based on 13 collared elephants in northern Tanzania have shown that cross-border movement of elephants from Tanzania to Amboseli National Park is common due to ecosystem requirements (TAWIRI, 2022). Further, the findings revealed that one of the collared elephants (**Collar ID No. 34237**) was killed in Kajiado area of Kenya on 21st December 2023 as a measure against human-elephant conflicts / crop raiding. However, there was no outcry from Tanzania Government accusing Kenya for

killing **“its elephant”**. In recognition of research individuals, none of the 12 collared elephants has been killed either for trophy or problem animal control by the Tanzanian authority. Furthermore, the elephant movement analysis data showed that of all collared elephant monitored in 4 years’ time, they spent 71.52% of their time in Tanzania as compared to Amboseli where they spent only 28.48% of their time, a scenario attributed to increased anthropogenic activities and infrastructure development in Amboseli.

D: Elephant hunting is not the major threat to elephant population: The main threats to Elephants and other wildlife species are habitat loss (land use changes), Human Elephant Conflicts (HEC) and poaching. In Amboseli and nearby reserves, shrinking of home range attributed to increasing rangeland conversion to farmlands and settlements alongside fencing have more devastating effects to elephants. Therefore, singling out legal hunting as a threat to elephants, while excluding these more damaging factors, presents an obvious bias. Kenya kills more elephants through its management practices including HEC mitigation compared to Tanzania. According to Kenya’s National Elephant Action Plan for the 2023-2032, a total of 108 elephants have been killed in HEC for the year 2021. Further, in 2023 Amboseli Trust for Elephant recorded a total of 112 elephant deaths mostly due to poor nutrition and/or high parasite loads (Amboseli Trust For Elephant 2023 annual report, February, 2024).

E: Ignorance on Quota setting: Petitioners seem to lack or purposely overlook the facts on how elephant hunting quota is set by the Tanzania authority, and are completely wrong to say that the authority will announce the next season’s ‘unsustainable quota’ or take. For clarity, Tanzania set a quota of 50 elephants for trophy hunting every year (National Wildlife Utilization Quota Setting Manual 2020), which is a very conservative, established based on precautionary principles and represents only 0.083%, of the current population estimated at 60,000 elephants, which is far below the 0.3% of the minimum off-take. However, it must be noted that for six consecutive years (2018-2023), only 38 out of 300 elephant bulls allocated were hunted in Tanzania. This is an average of 6 elephants per year and equivalent to 12.6% utilization of the set hunting quota. This is not a high level of elephant off take through legal hunting as the petitioners claim, but rather a highly sustainable and very conservative harvest as opposed to high levels of hunting which are often unsustainable (Baker, 1997; Milner et al., 2007); and it is in line with the quota set in the Greater Mapungubwe Trans Frontier Conservation Area (GMTFCA) between Botswana, South Africa and Zimbabwe of hunting about 10 bulls annually (Selier et al., 2014).

F: Compliance with CITES provisions: Hunting of elephant complies with the provisions of the Convention on International Trade in Endangered Species of Wild Fauna and Flora (CITES), of which Tanzania has remained firm in its implementation since 1980. Tanzania and the Democratic Republic of Congo are the only two countries in East Africa Community (EAC) that have achieved full compliance with CITES and their National Legislations are in category I of the CITES. Although petitioners claims that hunting poses a negative effect in wildlife populations, Tanzania proved beyond doubt that elephant hunting does not have detrimental effects through the Non-Detrimental Findings (NDF) developed in 2016 and has recently launched the New Elephant Management Plan, 2023 – 2033, to ensure that elephants are well managed and sustainably utilized for the benefits of the people living along these magnificent species but also dangerous at times to their lives.

G: Observance of framework for species protection in cross border setting: Tanzania is a signatory to the Convention on Biological Diversity, Convention on Migratory Species and CITES which provide a framework for protection of species in cross border setting. However, these international conventions do not put a framework for resources shared or quota setting between states. Even in the Greater Mapungubwe Trans-Frontier Conservation Area which involves Botswana, South Africa and Zimbabwe, there is no common policy that exists in quota setting for cross border species, and each country determines its quotas (Selier et al., 2014). Although these three countries practice elephant trophy hunting, have no common policy due to many reasons.

H: Trophy hunting is a sovereign choice of Tanzania: we hunt for a purpose, and so it is a National interest. The UN Permanent Principle of National Sovereignty over natural resources which gives a right for a country to freely use, control and dispose natural resources (Lindsay et al., 2017; UN 2024). Tanzania is a sovereign state, and its Wildlife Policy recognize elephant trophy hunting unlike Kenya of which her Wildlife Policy does not allow trophy hunting. While transboundary or cross border wildlife management is very important for species conservation, still there are no practical common legal frameworks regarding wildlife resources sharing. The common Policy or legal framework might be even very difficult for Tanzania and Kenya due to having different wildlife policies when it comes to trophy hunting, leave alone the National sovereignty.

I: Protection of wildlife and their habitat, and the coexistence of the Tanzanian people with elephants is costly: Trophy hunting is part of management tools that

guarantees the survival of this species, generates resources for habitat and species conservation, as well as community livelihood support. The main revenue for TAWA and WMA for resource protection and conservation is realized through hunting (70%) and that photographic tourism generates hardly 30%. Therefore, without hunting, most of the wildlife habitats and protected areas will be degraded.

J: While transboundary conservation is highly important, **DECLARATIONS OR PETITIONS ARE NOT A SOLUTION, BUT DIPLOMACY IS NEEDED**, especially in exceptional circumstances like this, where two countries have different policies for the management of wildlife resources. Anti-hunting groups **MUST** understand that hunting is **CONSERVATION TOOL** and not **POACHING**

8 COUNTRY POSITION

Tanzania, a signatory to the Convention on International Trade in Endangered Species of Flora and Fauna (CITES), recognizes the importance of studying and consulting on the potential negative impacts of elephant hunting before imposing bans. In consideration of this, the ongoing petition and social media outcry are counterproductive because they disrupt the conservation programs that have proven successful in the management of elephants in Tanzania. The petition to stop elephant hunting or to formalize zero-elephant hunting should be interpreted with great care, taking into consideration of several reasons without excluding the UN Principle of Permanent Sovereignty over natural resources, where no state or country is above, can instruct, or direct another state. Moreover, it has to be clear that the decision of a country to hunt or not depends on multiple socio-ecological drivers. Therefore, Tanzania will continue to implement its National Wildlife Policy that allows hunting within the territory of Tanzania for peoples of Tanzania because: -

- A. Hunting is conducted in areas that are unsuitable for photographic tourism. The industry is also primarily a viable socio-economic activity that provides incentive for conservation in the country. Removing this incentive will undermine conservation efforts by increasing poaching and destruction of habitats due to inadequate resources to cater for anti-poaching operations and support to community livelihoods;
- B. Elephant hunting has been well regulated and done at minimal levels, where by only 10% out of 400 issued quotas of elephant have been hunted for a period of 8 years

(2016 to 2023). This proves that elephant hunting is well-regulated and has more conservation benefits to species than the purported effects;

- C. Elephant populations in Tanzania and other countries where hunting tourism is employed as a conservation tool are stable and increasing because resources generated through sustainable hunting and associated conservation programs are reinvested back to support conservation efforts. For example, the elephant population in Tanzania has increased from **43,000** in 2014 to **60,000** in 2022;
- D. Revenues generated from elephant hunting and other species are ploughed back to conservation hence reduces overdependence on donor support and neo-colonialism ideology. Therefore, disrupting this model and encouraging aid-dependency in the place of self-sufficiency is not desirable. These aid-funded programmes largely direct funds to NGOs, rather than communities, who are currently enjoying the benefits from hunting tourism. Under NGO funding, it is difficult to ensure that grant money can reach local communities where it is most needed;
- E. Community Wildlife Management Programs in Tanzania specifically on those targeted ecosystems and hunting areas will be severely affected because these areas are managed using revenues generated from the sustainable off-take of wildlife resources. For, hunting tourism generates an average of **USD 194,500** annually for the Enduimet, Ikona, Lake Burunge and Makame WMAs in northern Tanzania. Additionally, hunting companies support ant-poaching activities, health care services, construction of water ponds, and paying college fees for youth coming from these areas; and
- F. The ban on legally hunting elephants will destroy hundreds of thousands of jobs in the poorest rural areas, rendering thousands of family members destitute, causing the destruction of habitat through their conversions into wildlife non compatible land uses which may result in an enormous biodiversity loss and cause a massive spike in retaliatory killings. A case in point is Kenya, which had a 70% decline in its wildlife population between 1977 and 2016 following a ban imposed on legal hunting and an increase in ecologically damaging land uses (Ogutu et al. 2016).

9 CONCLUSION

It is evident that regulated and legal hunting is one of the most powerful tools to achieve sustainable biodiversity conservation and livelihood improvement in many parts of rural Africa and Tanzania is no exception (Msigwa et al., 2023; Muposhi et al., 2016; Lindsey et al., 2016). Elephant hunting quota setting is based on census data and the industry is highly regulated, and that is why the country ranks third in terms of savannah elephant population in Africa, which is over and above the number of elephants in many countries not practicing hunting, including Kenya. However, discussions on hunting tourism are mostly guided by emotions and ideologies, while facts about the importance of this undertaking to conservation and livelihoods are being understated.

We urge the petitioners to have concrete facts before embarking into fantasy conclusions and shift away from unproductive debates to more contemporary conservation pressing issues within the region. Tanzania understands that international co-operation is essential for the protection of certain species of wild fauna and flora against over-exploitation through international trade. Therefore, petitions and declarations are not a solution, but bilateral dialogue on species conservation and community benefit either through consumptive or non-consumptive wildlife utilization should be a priority.

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