

## **Reject the CITES Secretariat's Recommendation on the Swaziland Proposal**

The CITES Secretariat has recommended that the proposal by Swaziland to sell 330 kg of white rhino horn from stocks and 20 kg annually from natural deaths (8 kg) and the harvesting of horn on a rotational basis from about 4 rhino (12 kg), be rejected. Their reason is that the proposal does not meet "the precautionary measures" or principles of acting in the best interests of the rhino species. The Secretariat must see potential harm to the species should the proposal be adopted but they have not clarified the risks and may not have understood where the real risks actually lie.

Swaziland's proposal was made in order to generate income (\$1.2 million p.a.) to finance the management of its parks where 73 white rhino live. Without that income their rhinos will be at greater risk to poachers. Their proposal is aimed at mitigating risk and not increasing risk.

\$1.2 million p.a. may seem a small amount of money to most countries but it is vital to Swaziland's parks and they are the ones that have the sole responsibility for managing and financing the protection of their rhino. They have applied themselves with real commitment to rhino conservation and deserve the respect and rational consideration of CITES.

While only 3 rhino have been poached over the past 24 years in Swaziland, their rhino will be at increased risk as the South African anti-poaching efforts become more intense and rhinos become more difficult to find. 1,175 rhino were poached in South Africa in 2015 and the 2016 number will be similar.

The annual trade from Africa in rhino horn is all from poached horn and amounts to some 5,200 kg. The Swaziland sale of their stocks will amount to 6% of the annual trade and the ongoing sale of 20 kg p.a. will amount to 0.4% of annual trade. It is difficult to see how this small amount of trade can be of danger to the species and make the precautionary principle appropriate. It seems more likely to be an excuse by the Secretariat for the continuation of the ban on horn trade rather than admitting that the ban has failed and that there is need for a new approach. Invoking the Precautionary Principle prevents any change from the status quo and any progress in trade policy.

The ban on trade in horn over the past 39 years has been a failure. All that happened after the ban was that trade went underground where it thrived with tens of thousands of rhino being poached to feed the market and make criminals rich, despite all the efforts from CITES and many others. In my opinion the real risk for the future of the rhino species lies in the continuation of the ban and not in a well-regulated trade. There needs to be change. South Africa could satisfy the entire market, at current high prices, without the need to kill one rhino. The current situation is absurd.

Trade does need to be astutely constructed with, perhaps, a monopoly of supply selling to a cartel of licensed retailers in the Far East which would establish a distinct trade channel for legal horn. This is sometimes referred to as “Smart Trade” and follows a successful precedent set by De Beers in the trading of their diamonds. A monopoly would control prices so as to limit demand to sustainable levels of supply.

The working of markets (supply and demand and the price mechanism) is well understood. There should be no uncertainty or hidden risks or need for more data in order to understand the market for horn. Markets are savvy and will see the horn to be sold by Swaziland for what it is: a small amount of legal horn in a much larger illegal market.

The demand reduction practitioners will claim that any trade will send a message to the market that trade in rhino horn is acceptable and undermine their efforts at persuading the market in the Far East not to buy horn. All the poached horn (1,300+) sold from Africa is consumed by about one million people in the Far East but there could be 500 million people that would buy horn at lower prices. Demand reduction will not work at reducing poaching unless it persuades more than 499 million of those potential consumers that their interest is wrong.

Demand reduction will take longer to happen than rhino can withstand the current onslaught and is of great risk to the species if reliance is placed on it.

Also, law enforcement cannot be relied upon to conserve rhino. Poaching is difficult to control over vast areas and is expensive. The rewards to poaching are very large and that leads to corruption which undermines the law enforcement efforts. To place reliance on law enforcement to solve the rhino poaching problem in Africa is a high risk strategy.

The CITES Secretariat do not appear to have applied their minds objectively to the Swaziland proposal. They have put the risk to the species in the wrong place and need to change their recommendation. In my opinion it is in the best interests of the Swaziland population of rhino and all rhino that the proposal be recommended by the Secretariat and accepted by the Parties at CoP 17.

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