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**RE: ENVIRONMENTAL INVESTIGATION AGENCY COMMENTS ON THE DRAFT NATIONAL BIODIVERSITY ECONOMY STRATEGY**

The Environmental Investigation Agency (EIA) welcomes the opportunity to submit comments and recommendations to the South African National Department of Forestry, Fisheries and the Environment (DFFE) on the Draft National Biodiversity Economy Strategy in terms of Government Notice 4492 of 8 March 2024 (Government Gazette 50279).

EIA is an international organisation that campaigns against environmental crime and abuse. Our investigations focus on transnational organised wildlife crime, with a focus on elephants, rhinos, pangolins and Asian big cats. EIA has worked to protect rhinos and elephants from poaching and illegal trade for four decades.

**Introductory Comments**

Regarding the policy context of the Draft NBES, EIA notes the application of the South African White Paper on the Conservation and Sustainable Use of South Africa's Biodiversity (Government Notice 3587 of 14 June 2023) ('the White Paper'). However, the extent to which the Draft NBES has been informed by DFFE's Policy Position on the Conservation and Sustainable Use of Elephant, Lion, Leopard and Rhinoceros ('the Policy Position') is unclear.<sup>1</sup>

EIA submitted substantial comments on the Policy Position to DFFE in October 2023, highlighting significant concerns regarding DFFE's approach and policy position on commercial trade in rhino and elephant wildlife products in general, while also supporting DFFE's objective to phase out domestication and intensification of management of rhinoceroses.<sup>2</sup> It is concerning that there does not appear to be rationalisation between the proposals contained in the Draft NBES and the South African National Integrated Strategy to Counter Wildlife Trafficking (NISCWT), particularly regarding efforts to detect and prevent illicit trade in elephant ivory and rhino horn, both of which are priorities under the NISCWT.<sup>3</sup>

As an overarching comment, EIA strongly opposes proposed Action 10.4. EIA reiterates that the utilisation and trade of rhino horn and ivory, either domestically or internationally, does not alleviate poaching pressure on rhinos and elephant. Instead, it increases poaching pressure and illegal trade by stimulating demand, complicates enforcement efforts and provides opportunities to launder poached and other illegal sources of ivory and rhino horns onto legal markets.

Considering the ongoing rhino poaching crisis in South Africa and the continued poaching risk to elephant populations in the Southern African region, the utilisation of rhino horn and ivory as envisaged in the Draft NBES would be immensely dangerous to implement and counterproductive to the stated purpose of the Draft NBES. Proposed Action 10.4 in the Draft NBES will significantly undermine and hinder a number of biodiversity conservation, counter wildlife trafficking and enforcement initiatives in South Africa and the broader region, including the objectives and effectiveness of the NISCWT. Moreover, proposed Action 10.4 will undermine and counteract behaviour-change and demand reduction progress in consumer countries, as well as domestic legislation in other countries prohibiting the possession and trade of rhino horn and elephant ivory.

The establishment and expansion of domestic markets for rhino horn and elephant ivory is not in alignment with global conservation trends and practices nor with international obligations under the Convention on International Trade in Endangered Species of Wild Fauna and Flora (CITES). The Socio-Economic Impact Assessment Study (SEIAS) prepared on the Draft NBES highlighted the reputational risk of activities that bring South Africa into disrepute. The utilisation of rhino horn and elephant ivory contemplated in the Draft NBES will have significant negative reputational repercussions for South Africa (as well as a likely negative economic repercussion) and should be avoided at all costs.

The South African government is encouraged to maintain its international reputation as a leader in sustainable conservation and as a premier sustainable wildlife tourism destination by abandoning the proposal under Action 10.4 and to introduce a new Action that focuses on the phase-out and closure of its domestic legal markets for rhino horn and ivory. South Africa is also encouraged to act as a global, continental and regional leader by developing a clear policy position and practice that supports the destruction and responsible disposal of its rhino horn and ivory stockpiles.

EIA's comments are focused primarily on Action 10.4: 'Develop and implement a strategy for a market for regulated domestic trade in high-end parts and derivatives (e.g., rhino horn and elephant ivory) for local value-add enterprises based on processing and use of products'. EIA also provided comments on Actions 2.1 and 4.4. The comments are set out in accordance with the structure and outline of the Draft NBES.

**Action 2.1: Increase the number of Big five animals available for fair-chase trophy hunting, especially in community owned areas and larger contiguous privately owned land**

EIA does **not support** the proposed increase in the annual quota of elephants and other Big Five species for trophy hunting. Increasing the number of animals available for trophy hunting should not be a goal in and of itself. Hunting policies and quotas should ensure a clear species conservation benefit based on sound science and non-detriment findings rather than exploitation with the aim of maximising profit.

Proposed Action 2.1 carries significant risk to South Africa's reputation as a sustainable conservation leader and premier wildlife tourism destination.<sup>4</sup> This action is not in alignment with the Policy Objective 4 in the Policy Position, i.e., the promotion of live export of the five species to range states or any other appropriate and acceptable destinations with suitable habitats on the African continent.

EIA **recommends** that this Action be amended to: *'Increase the number of Big Five animals available for live export to current or former range states on the African continent'* for instances that will further support the recovery and *in situ* conservation of wild populations in other range states.

**Action 4.4: Identify mechanisms, in consultation with traditional harvesters and healers, to scale cultivation of indigenous medicinal plants for sustainable use within the traditional medicine sector**

EIA **supports** proposed Action 4.4. In November 2023, EIA and the South African NGO Blood Lions organized a roundtable with 20 traditional health practitioners (THPs) from across the country to identify common values and opportunities for protecting the environment.<sup>5</sup> The roundtable affirmed that successful wildlife conservation depends on thriving communities, and the THPs present expressed their shared desire to take ownership of environmental issues related to traditional African medicine. As such, it is imperative that the DFFE and other stakeholders strengthen engagement with THPs to improve lawful opportunities to sustainably harvest indigenous plants for medicinal use.

**Action 10.4: Develop and implement a strategy for a market for regulated domestic trade in high-end parts and derivatives (e.g. rhino horn and elephant ivory) for local value-add enterprises based on processing and use of products**

EIA **strongly opposes** Action 10.4 and is disappointed that South Africa continues to promote the commercial value and consumptive utilisation of rhino horn and elephant ivory. EIA recommends that South Africa abandon the proposal under Action 10.4 and introduce a new Action that focuses on the phase-out and closure of its current domestic legal markets for elephant ivory and rhino horn. South Africa is also encouraged to act as a global, continental and regional leader by developing a clear policy position and practice that supports the

responsible disposal of its rhino horn and ivory stockpiles. EIA does not support the Action as currently set out in the Draft NBES for the following reasons:

**1. The proposed Action is out of alignment with CITES obligations and Recommendations and the current South African legal regime.**

International commercial trade in elephant ivory and rhino horn is currently banned and there is little support for the resumption of international commercial trade in rhino and elephant parts and derivatives. Indeed, this has been acknowledged by DFFE in the Policy Position, the recommendations of the High-Level Panel and the Rhino Commission of Inquiry. This lack of international appetite and support, due to concerns about the threats such trade would pose to the continued survival of these species, is best demonstrated by the overwhelming majority votes to quash proposals to remove the prohibitions on ivory and rhino horn trade that were submitted to 19th CITES Conference of the Parties (CoP) in 2022.<sup>6</sup>

Proposed Action 10.4 envisions tourists visiting South Africa as the target demographic for new rhino horn and ivory markets and industries. By specifying that tourist souvenirs would be “for personal use,” it seems that the draft NBES assumes this would be sufficient to avoid CITES restrictions on international trade in rhino horn and ivory products. However, international tourists would not be able to bring rhino horn or ivory souvenirs out of the country without obtaining approval and official CITES permits from the South African government and their home country’s government. The CITES exemption for personal effects does not apply to Appendix I specimens (e.g., rhino horn and elephant ivory) acquired outside an individual's country of usual residence<sup>7</sup>. Therefore, if a tourist wishes to export rhino horn or elephant ivory for non-commercial purposes, then CITES import and export permits issued by the importing and exporting countries, respectively, are required pursuant to Article III of the Convention. In many countries, including those in the “Far East” such as China, ivory and rhino horn possession and trade is also prohibited by their respective domestic legislation.

Advocating for and instituting policies that promote trade in endangered species parts and derivatives undermines the effectiveness of CITES international commercial trade bans. Establishing a legal domestic market for worked rhino horn and expanding the existing elephant ivory domestic market does not align with CITES recommendations and global trends of CITES Parties voluntarily closing legal domestic markets. For example, CITES Parties have been urged to close their domestic ivory markets,<sup>8</sup> which the majority of African elephant range states and historically major consumers of ivory such as China, the UK, EU and USA have since done.

Carving, shaving, or otherwise modifying legally acquired raw rhino horn, including the production of rhino horn powder, is prohibited by South Africa's regulations on domestic rhino horn trade due to the extreme difficulty associated with ensuring the legality and traceability of worked rhino horn products. For most worked products, including rhino horn powder, only costly and time-consuming DNA tests can prove provenance. Even the current limited domestic trade in legally acquired raw rhino horn has facilitated instances of illegal trade.<sup>9</sup>

South Africa currently permits trade in antique ivory, but not new ivory. Concerns have been raised regarding the relatively poor regulation of this market.<sup>10</sup> It is assumed that government and private rhino horn and ivory stockpiles will be used to supply the envisioned domestic markets. In this instance, a significant amount of time, money and effort will be required to review and strengthen South Africa’s legal domestic ivory trade regulations and schemes to avoid the laundering of illicit ivory as well as to develop new legislation regarding the proposed rhino horn trade. Instead, these funds and effort should be used more effectively to phase out South Africa’s existing legal ivory market and to develop a clear and unambiguous ivory and rhino horn stockpile disposal and destruction policy.

**2. Legal domestic markets for wildlife parts and products from threatened species, such as rhino horn and elephant ivory, stimulate consumer demand which can result in increased poaching and illegal trade. Legal domestic markets also complicate enforcement efforts and can present opportunities to launder illegal products into trade.**

Proposed Action 10.4 of the Draft NBES undermines the Actions contained in the Policy Position related to phasing out the domestication and intensification of rhino management. The Policy Position calls for reversing intensive management practices that compromise the conservation of wild rhinos and is explicitly clear that

“any registrations of CITES CBOs [captive breeding operations], **any other forms of production**, or any certification as captive specimens, in terms of the CITES Regulations for international trade, as well as commercial trade in horn from rhinoceros CBOs, **will not be officially supported and/or approved until recommendations of Option 3 of the [Committee of Inquiry] and Rhino Action Plan relating to security (law enforcement), community empowerment, biological management, responsive legislative provisions and effective implementation, and demand management/reduction, are fully addressed**” (emphasis added).

Assigning a consumptive, commercial value to ivory and rhino horn perpetuates the problematic view of wildlife as mere commodities. This fuels consumer demand and places increasing poaching pressure on these species. This has been the case for both elephant ivory and rhino horn. As concluded in the Monitoring Illegal Killing of Elephants (MIKE) Report to CITES CoP18 **“there is overwhelming evidence that the** [two CITES-approved ‘one off’] **sales did exacerbate poaching and ivory trafficking**” (emphasis added).<sup>11</sup> The 2021 findings of the MIKE Report to CoP19 align with IUCN’s conclusion that poaching continues to be a major threat to African elephants, with PIKE estimates for 2021 across Africa higher than the 2020 estimate, indicating a recent increase in poaching, particularly in West and Central Africa.<sup>12</sup> Similarly, the MIKE report to CoP19 found a strong association between the illegal killing of elephants and the global annual trend in the price of ivory. This supports the hypothesis that increased demand for ivory results in a price increase that may incentivise poaching.

South Africa still has significant progress to make before achieving the Option 3 recommendations of the Committee of Inquiry and Rhino Action Plan, and fast-tracking the development of new rhino horn markets and industries without full implementation of the Option 3 recommendations, especially those related to security and demand management/reduction, would exacerbate poaching and illegal trade.

Moreover, the development of new rhino horn markets would necessitate the domestication of rhinos to maximize the supply of raw materials in direct conflict with Policy Objective 2 of the Policy Position Paper, i.e. phasing out domestication of rhinos, and prevent South Africa from “maintaining the ecological integrity of the biodiversity resource base” as intended by the Draft NBES. Trade in rhino horn from captive-bred rhinos could also promote captive rhino breeding at the expense of wild rhino conservation. If implemented, proposed Action 10.4 may incentivize private rhino owners to convert their rhino management schemes to intensive breeding operations to maximize horn production, which could lead to reduced wild rhino populations among other negative consequences for wild rhino conservation.

Legal markets for rhino horn and for other wildlife products from threatened species including elephant ivory, pangolin scales, and tiger parts, are known to be exploited by criminals for laundering illegal goods and stimulating consumption.<sup>13</sup> The speculative stockpiling of ivory and rhino horn undermines the CITES ivory and rhino horn trade bans by sending a message that suggests a reversal of the bans is inevitable, perpetuating demand for ivory and rhino horn and fueling poaching across Africa and Asia.

All ivory and rhino horn stockpiles are at risk of theft, and high security costs create an added burden for the private citizens and government agencies responsible for safeguarding ivory and rhino horn stockpiles. Indeed, in July 2023 South Africa experienced its worst rhino horn stockpile theft in years when thieves broke into North West Parks Board rhino horn storeroom and stole 51 rhino horns.<sup>14</sup>

There have also been a number of private rhino owners, many of whom also possess significant rhino horn stockpiles, that have been linked to criminal activities involving rhinos and rhino horn trafficking. For instance, in 2019 two individuals were arrested and later convicted for their role in trafficking 181 horns sourced from a private stockpile and allegedly destined for Southeast Asia;<sup>15</sup> also in 2019, China seized a consignment of 245 kg of rhino horn in which several horns were microchipped, suggesting that at least some were derived from stockpiles;<sup>16</sup> in 2021 alleged rhino horn trafficker Dawie Groenewald was arrested once again for trafficking 19 rhino horns while out on bail for another case involving rhino horn trafficking;<sup>17</sup> and in 2023 a prominent rhino owner was arrested after his farm was raided and more than two dozen dead rhinos and 10 unmarked rhino horns were found on his property.<sup>18</sup>

Legal domestic markets further complicate enforcement by requiring additional controls, increased enforcement capacity, more anti-corruption efforts and costly tools and databases. An example is the rampant poaching of abalone in South Africa as a result of its legal trade.<sup>19</sup> Conducting DNA analysis to identify the origin

of the specimen seized is a costly and time-consuming exercise – for example, the annual costs associated with the RhODIS (Rhino DNA Index System) are approximately ZAR4 million.<sup>20</sup>

Corruption is recognised as key driver of illegal wildlife trade. The NISCWT identifies that wildlife trafficking has become a national security threat because ‘corruption linked to wildlife trafficking in South Africa is not only hampering the Government’s ability to prevent wildlife trafficking, but has allowed criminal networks to establish criminal elements within government structures responsible for the detection, investigation and prevention of such trafficking’. SANParks recently instituted an Integrity Management Plan for Kruger National Park due to the role corruption has played in the decimation of its rhinos,<sup>21</sup> and a similar strategy is in development for implementation by Ezemvelo-KZN Wildlife at Hluhluwe-iMfolozi Park.<sup>22</sup> Given the existing corruption issues, it is inevitable that creating new legal markets or expanding existing ones will only further embed corruption and increase trafficking.

The potential significant negative implications and risks posed by the proposed domestic markets and industries for rhino horn and ivory, if implemented, will not be limited to South Africa and will impact countries grappling with consumption of illegally sourced elephant ivory and rhino horn. These negative impacts at a broader regional and global level should be avoided as much as possible.

### **3. Rhino and elephant populations in South Africa and the Southern African region are being targeted for poaching for illegal trade in rhino horn and elephant ivory**

Rhino poaching is increasing once again in South Africa. In 2023 an estimated 499 rhinos were killed in South Africa, representing the greatest number of rhinos poached in a single year in the country since 594 were killed in 2019.<sup>23</sup> After more than a decade of incessant poaching, Kruger National Park’s white rhino population has plummeted from more than 10,000 animals to fewer than 2,000.<sup>24</sup> With fewer rhinos left to poach and intensified enforcement and anti-corruption efforts in Kruger National Park, organized criminal networks are now focusing their efforts on Hluhluwe-iMfolozi Park. As a result, Hluhluwe-iMfolozi Park has suffered two consecutive record-breaking years of rhino poaching in 2022 and 2023.

Rhino poaching is also occurring at high levels in other Southern African range states. In Namibia, at least 28 rhinos were killed from 1 January through 31 March 2024.<sup>25</sup> If this rate of rhino poaching continues, Namibia will set a new record for the number of rhinos poached in a single year since the current rhino poaching crisis began in the mid-2000s.

Proposed Action 10.4 would intensify rhino poaching by generating new demand for rhino horn that organized criminal elements would exploit to the detriment of rhino populations, the national and provincial governments, and private rhino owners.

Elephant populations in the region, including South Africa, remain at risk of poaching for illegal ivory trade with recent seizures and poaching incidents across Namibia, Botswana and Mozambique suggesting an increase in elephant poaching.<sup>26</sup> Now more than ever it would be immensely irresponsible and dangerous to implement policies that would increase demand for rhino horn and elephant ivory.

### **4. The proposed action will damage South Africa’s global reputation as a conservation leader and premier sustainable wildlife tourism destination**

The SEIAS prepared on the Draft NBES highlighted the reputational risk of activities that bring South Africa into disrepute. There can be no doubt that the proposed creation and expansion of domestic markets for rhino horn and ivory targeted at international tourists contradicts and undermines South Africa’s reputation as a premier destination for sustainable wildlife tourism. The divisive nature of this position does little to build consensus with other African elephant and rhino range States regarding the conservation and management of these endangered species, as well as with key consumer countries grappling with illegal rhino horn and elephant ivory trade.

The financial impact of rhino poaching on tourism is difficult to quantify, although a 2015 study suggests that rhino poaching between 2006–14 caused total annual losses to tourism revenue in South Africa of approximately €133 million, while elephant poaching in 2010-2012 robbed Africa of a total loss of potential legal income of €2.23

billion – €3.12 billion.<sup>27</sup> Given the dependency of the South African economy on tourism, South Africa cannot afford to invest in activities and industries that do not attract tourists. Non-consumptive wildlife tourism such as photo tourism still offers significant economic value that should be expanded upon as identified in the NBES. Given the substantial global efforts to change tourist behaviour to view wildlife trade and unethical practices as something to avoid, it is likely that tourist perceptions of the rhino horn and ivory markets will not be favourable, and tourists will choose to visit elsewhere where they can be assured of ethical and sustainable wildlife tourism.<sup>28</sup> The South African government is encouraged to maintain its international reputation as a leader in sustainable conservation and as a premier sustainable wildlife tourism destination by abandoning such efforts.

## 5. The proposed action will undermine local, regional and global demand reduction and behaviour change interventions

Creating offerings of wildlife products and labelling them as 'high-value' affirms a commercial value in endangered species and perpetuates undesirable social norms of consumption and commercial utilisation. It also undermines the significant investment by governments and civil society in demand reduction and behaviour change interventions targeting consumers of wildlife products in Asia.

The offering of rhino horn as a 'health remedy' that is only available to those fortunate enough to afford international travel could lead to illegal exports and copy-cat industries arising in countries where rhino horn is consumed (illegally). Additionally, creating such proposed domestic markets will hinder and disrupt the ongoing extensive efforts and investments made by governments and civil society organisations in both Africa and Asia to tackle and deter illegal wildlife trade, which has resurged post the Covid-19 pandemic.<sup>29</sup>

<sup>1</sup> DFFE. (2024). Policy Position on the Conservation and Sustainable Use of Elephant, Lion, Leopard and Rhinoceros. Available at: <https://www.dffe.gov.za/sites/default/files/legislations/Revised%20Policy%20Position%20on%20the%20%20Conservation%20and%20Sustainable%20Use%20of%20ELLR.pdf>

<sup>2</sup> A copy of the submitted comments has been annexed.

<sup>3</sup> Department of Forestry, Fisheries and the Environment. (2023). National Integrated Strategy to Combat Wildlife Trafficking. Available online at: <https://www.saps.gov.za/DPCI/downloads/niscwt.pdf>

<sup>4</sup> Research conducted by Good Governance Africa on the economic value of trophy hunting to the South African biodiversity economy is limited, and potentially undermines non-consumptive tourism potential. See: Good Governance Africa (2022). *Trophy hunting in South Africa: is it worth it?* [online]. Available at: <https://digitalmallblobstorage.blob.core.windows.net/wp-content/2022/03/Trophy-Hunting-Working-paper.pdf>

<sup>5</sup> EIA. (2024). Finding Common Ground. [online]. Available at: <https://us.eia.org/blog/finding-common-ground/>

<sup>6</sup> EIA. (2022). CITES CoP19 – an overall win for wildlife with greater commitments to protect a variety of species [online]. Available at: <https://eia-international.org/news/cites-cop19-an-overall-win-for-wildlife-with-greater-commitments-to-protect-a-variety-of-species/> Also see the rationale contained in CITES 2022. *Cop19 Prop 5: Transfer populations of Botswana, Namibia, South Africa and Zimbabwe from Appendix II to Appendix I* [online]. Cites.org. Available at: [https://cites.org/sites/default/files/documents/E-CoP19-Prop-05\\_0.pdf](https://cites.org/sites/default/files/documents/E-CoP19-Prop-05_0.pdf)

<sup>7</sup> CITES. (2016). *Res. Conf. 13.7 (Rev. CoP17) Control of Trade in Personal and Household Effects* [online]. Available at: [https://cites.org/sites/default/files/document/E-Res-13-07-R17\\_0.pdf](https://cites.org/sites/default/files/document/E-Res-13-07-R17_0.pdf)

<sup>8</sup> CITES Resolution Conf. 10.10 (Rev. CoP19) on Trade in elephant specimens. Available at: <https://cites.org/sites/default/files/documents/COP/19/resolution/E-Res-10-10-R19.pdf>

<sup>9</sup> EIA. (2022). Closure of Domestic Rhino Horn Markets that Contribute to Poaching or Illegal Trade and Rhino Horn DNA Forensic Analysis. [online]. Available at: <https://us.eia.org/wp-content/uploads/2022/03/EIA-Closure-of-Domestic-Rhino-Horn-Markets-brief-to-SC74.pdf> ; Carnie, T. (2020). 'I Want My Horns Back' Says Rhino Baron after Trade Deal Goes Pear-shaped. *Daily Maverick*. [online]. Available at:

<https://www.dailymaverick.co.za/article/2020-06-14-i-want-my-horns-back-says-sa-rhino-baron-after-trade-deal-goes-pear-shaped/>

<sup>10</sup> Journal of African Elephants. (2019). Selling Ivory in South Africa is a Thriving Business. Available:

<https://www.africanelephantjournal.com/selling-ivory-in-south-africa-is-a-thriving-business/#:~:text=In%20South%20Africa%2C%20trade%20in,ivory%20items%20must%20be%20registered.>

<sup>11</sup> CITES 2019. *CoP18 Doc. 69.2 Report on Monitoring the Illegal Killing of Elephants* [online]. Available at: <https://cites.org/sites/default/files/eng/cop/18/doc/E-CoP18-069-02.pdf>

<sup>12</sup> CITES 2022. *CoP19 Doc. 66.5 Report on Monitoring the Illegal Killing of Elephants* [online]. Available at: <https://cites.org/sites/default/files/documents/E-CoP19-66-05.pdf>

<sup>13</sup> EIA. (2012). *Blood Ivory*. London, United Kingdom; Xu, L. et al. 2016. *An Overview of Pangolin Trade in China*. TRAFFIC, Cambridge, United Kingdom; EIA. 2013. *Hidden in Plain Sight*. London, United Kingdom.

<sup>14</sup> Engel, K. (2023). Parliament hears how 'sophisticated syndicate' stole 51 rhino horns from a state facility. *Daily Maverick*. Available at: <https://www.dailymaverick.co.za/article/2023-08-02-parliament-hears-how-sophisticated-syndicate-stole-51-rhino-horns-from-a-state-facility/>

<sup>15</sup> Carnie, T. (2020). 'I Want My Horns Back' Says Rhino Baron after Trade Deal Goes Pear-shaped. *Daily Maverick*. [online]. Available at: <https://www.dailymaverick.co.za/article/2020-06-14-i-want-my-horns-back-says-sa-rhino-baron-after-trade-deal-goes-pear-shaped/>

<sup>16</sup> EIA. (2023). Rhino Horn Stockpiles are Increasing – So Is Their Role in the Illegal International Trade. [online]. Available at: <https://us.eia.org/blog/rhino-horn-stockpiles-are-increasing-so-is-their-role-in-the-illegal-international-trade/>

<sup>17</sup> Viljoen, B. (2024). 14 Years on: Trial Date Set for Dawie Groenewald, Co-accused. *Polokwane Review*. [online]. Available at: <https://www.citizen.co.za/review-online/news-headlines/local-news/2024/03/08/dawie-groenewald-back-in-court-in-oct/>

<sup>18</sup> Ogao, E. (2023). US National Arrested in South Africa on Wildlife Trafficking, Weapons Charges. *ABC News*. [online]. Available at: <https://abcnews.go.com/International/us-national-arrested-south-africa-wildlife-trafficking-weapons/story?id=105995418>

<sup>19</sup> de Greef, K. (2018). The underworld of abalone. [online]. Available at: <https://globalinitiative.net/analysis/abalone-poaching/>

<sup>20</sup> Confirmed through personal communication between EIA and RhoDIS in 2023.

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- <sup>21</sup> DFFE. (2024). KwaZulu-Natal Carried the Brunt of Rhino Poaching in 2023, Says Creecy. [online]. Available at: [https://www.dffe.gov.za/mediareleases/creecy\\_relasrhinopoachingstats2024feb27](https://www.dffe.gov.za/mediareleases/creecy_relasrhinopoachingstats2024feb27)
- <sup>22</sup> WWF. (2024). WWF Reacts to 2023 Rhino Poaching Statistics. [online]. Available at: <https://www.wwf.org.za/?47322/WWF-reacts-to-2023-rhino-poaching-statistics>
- <sup>23</sup> DFFE. (2024). KwaZulu-Natal Carried the Brunt of Rhino Poaching in 2023, Says Creecy. [online]. Available at: [https://www.dffe.gov.za/mediareleases/creecy\\_relasrhinopoachingstats2024feb27](https://www.dffe.gov.za/mediareleases/creecy_relasrhinopoachingstats2024feb27)
- <sup>24</sup> SANParks. (2023). SANParks Annual Report 2022-2023. [online]. Available at: <https://www.sanparks.org/wp-content/uploads/2023/09/SANParks-Annual-Report-2022-2023.pdf>
- <sup>25</sup> Nakashole, P. (2024). Environment ministry records 28 rhinos poached this year. *The Namibian*. Available at: <https://www.namibian.com.na/environment-ministry-records-28-rhinos-poached-this-year/>
- <sup>26</sup> See: African Geographic. (2023). 'Is elephant poaching on the rise in Botswana?' [online]. Available at: <https://africageographic.com/stories/is-elephant-poaching-on-the-rise-in-botswana/>; Xinhua. 2023. 'Namibia sees rhino poaching drop as elephant face increased threat' [online]. Available at: <https://english.news.cn/20231128/6ba001ccb49b4d4a836478679d778b9a/c.html>; Journal of African Elephants. (2024). 'Botswana and Namibia in joint elephant poaching investigation' [online]. Available at: <https://www.africanelephantjournal.com/botswana-namibia-in-joint-elephant-poaching-investigation/>; Club of Mozambique. (2024). 'Mozambique: Authorities seize huge haul of elephant tusks bound for Dubai – photos' [online]. Available at: <https://clubofmozambique.com/news/mozambique-authorities-seize-huge-haul-of-elephant-tusks-bound-for-dubai-photos-256096/>
- <sup>27</sup> Smith and Porch 2015. *The Costs of Illegal Wildlife Trade: Elephant and Rhino. A study in the framework of the EFFACE research project* [online]. Available at: [https://www.ecologic.eu/sites/default/files/publication/2016/efface\\_d3.2c-quantitative\\_and\\_monetary\\_analysis\\_of\\_elephant\\_and\\_rhino\\_hunting.pdf](https://www.ecologic.eu/sites/default/files/publication/2016/efface_d3.2c-quantitative_and_monetary_analysis_of_elephant_and_rhino_hunting.pdf)
- <sup>28</sup> See for example: World Tourism & Travel Council. (2021). *Preventing Illegal Wildlife Trade Guidelines* [online]. Available at: <https://www.humanrights-in-tourism.net/sites/default/files/media/file/2021/rc177preventing-illegal-wildlife-trade-1831.pdf>; South African Tourism Service Association. (2019). *Guide to Evaluating Captive Wildlife Attractions & Activities* [online]. Available at: [https://www.tourismportals.co.za/file/satsa\\_humananimalinteractions\\_final5\\_interactive\\_red.pdf](https://www.tourismportals.co.za/file/satsa_humananimalinteractions_final5_interactive_red.pdf)
- <sup>29</sup> Unite for Wildlife (2023). 'The reawakening of the illegal wildlife trade in the aftermath of COVID' [online]. Available at: <https://unitedforwildlife.org/news/illegal-wildlife-trade-post-covid/>