

14 October 2019

Permanent Mission of Pakistan to the United Nations

H.E. Ms. Maleeha Lodhi

Ambassador Extraordinary and Plenipotentiary Permanent Representative

Delivered By Hand

Excellency,

URGENT LETTER REGARDING IMPORT OF ELEPHANTS TO PAKISTAN FROM AFRICA

We, the undersigned, are a group of thirty-five global specialists in elephant biology, husbandry, elephant management, legal and policy analysis, economics and conservation, most of whom are based in Africa.

We present our compliments to the Permanent Mission of Pakistan to the United Nations and Her Excellency.

It has been reported in the press in Pakistan¹, confirmed by Punjab Wildlife Director Naeem Bhatti and confirmed by the Ministry of Environment and Tourism in Namibia² that Pakistan has made an application to import 10 African elephants from Namibia to captive facilities in Pakistan.

We are deeply concerned about this proposed import. Our concerns are based on our understanding of elephant biology, of international agreements and national legislation as well as public sentiment within Africa and more widely.

We urgently call on the Prime Minister of Pakistan to immediately suspend and ultimately cancel the plans for such an import.

We would greatly appreciate it if you could urgently forward our concerns and this letter to your Prime Minister and the relevant authorities for action.

Removing baby elephants from their families is increasingly recognised as an ethically and ecologically unacceptable practice. It is universally recognized that elephants are wide-ranging, vastly intelligent, sentient beings with a highly organised social structure including strong family bonds that can last a lifetime. Elephants also have basic needs for stimulating ecological and social environments, and for the freedom to exercise choice over their foraging options and companions. These needs cannot be met under captive conditions and elephants so deprived inevitably suffer from physical and mental pathologies. At the same time, it is known that removal of elephants from their social groups and ecosystems is very disruptive to the wild populations, while having extremely traumatic and long-lasting

¹ <https://tribune.com.pk/story/2069103/1-permit-importing-elephants-issued-lhc/>

² <https://www.namibian.com.na/84183/read/Export-of-elephants-under-review>

effects on the psychological well-being of the juvenile elephants removed from their families.³ 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 for both the calves and remaining families and groups and the negative effects can be severe and lifelong.⁴ The well-documented symptoms of Post-Traumatic Stress Disorder (PTSD) displayed by captive elephants in zoos around the world are testimony to the damage caused by the operations of capture and long-distance transport to such *ex situ* locations.

According to a paper 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 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*”.⁵

Based on the body of overwhelming scientific evidence, South Africa took the commendable decision in 2008 to ban the capture of elephants from the wild for the purposes of captivity and trade under the terms of the National Norms and Standards for the Management of Elephants in South Africa (2008). The International Union for Conservation of Nature’s Species Survival Commission African Elephant Specialist Group opposes the removal of African elephants from the wild for any captive use.⁶ This position was reaffirmed at the group’s meeting in Pretoria, South Africa in July 2019. On 6 September 2019, elephant specialists from around Africa and the world participated in an Indaba in South Africa, ‘*Taking Elephants out of the Room*’, to scrutinize the science, policy and welfare issues related to elephants in captivity. The overwhelming conclusion of the Captive Elephant Indaba was that no new elephants should be placed in captivity and elephants currently in captivity should be rewilded.⁷

Under the Convention on International Trade in Endangered Species of Wild Fauna and Flora (CITES), African elephants from countries on Appendix II listing (currently Botswana, Namibia, South Africa and Zimbabwe) may be exported only to ‘appropriate and acceptable destinations’. In August, the 18th Conference of the Parties (CoP18) agreed that ‘appropriate and acceptable destinations’ for African elephants taken from the wild are defined as *in situ* conservation programmes or secure areas in the wild, within the species’ natural and historical range in Africa⁸. Exemptions are foreseen only in exceptional circumstances where, in consultation with the CITES Animals Committee and the IUCN African Elephant Specialist Group, it is considered that a transfer to *ex situ* locations will provide demonstrable *in situ* -conservation benefits for African elephants, or in the case of temporary transfer in

³ G. A. Bradshaw and Allan N. Schore, “How Elephants Are Opening Doors: Developmental Neuroethology, Attachment and Social Context,” *Ethology* 113, no. 5 (2007): 426–36, <https://doi.org/10.1111/j.1439-0310.2007.01333.x>; Graeme Shannon et al., “Effects of Social Disruption in Elephants Persist Decades after Culling,” *Frontiers in Zoology* 10, no. 1 (2013), <https://doi.org/10.1186/1742-9994-10-62>; Rob Slotow et al., “Older Bull Elephants Control Young Males,” *Nature* 408, no. 6811 (2000): 425–26, <https://doi.org/10.1038/35044191>; G. A. Bradshaw et al., “Elephant Breakdown,” *Nature* 433, no. 7028 (2005): 807–807, <https://doi.org/10.1038/433807a>.

⁴ 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

⁵ <https://cites.org/sites/default/files/eng/com/sc/69/inf/E-SC69-Inf-36.pdf>

⁶ <https://www.iucn.org/ssc-groups/mammals/african-elephant-specialist-group/afesg-statements/removal-african-elephants-captive-use>

⁷ <https://emsfoundation.org.za/elephants-in-captivity-to-come-under-the-spotlight/>

⁸ <https://cites.org/sites/default/files/eng/cop/18/Plen/SR/E-CoP18-Plen-Rec-03-R1.pdf>

emergency situations. This decision, with its basis in elephant biology and welfare, was accepted by an overwhelming (greater than two-thirds) majority of Parties at CoP18. It is clear that Namibia and any other exporting country that are party to CITES are obliged to respect this decision.

Globally, public sentiment is running against the keeping of this iconic African species in captivity. Previous exports of wild elephants from Africa generated considerable backlash from the public across the world, and continued actions in this regard will damage the reputation of Pakistan as a legitimate voice in nature conservation. The proposal for the re-definition of 'appropriate and acceptable destinations' was led by the African Elephant Coalition, which includes over 30 African range and non-range States. The AEC based their arguments on elephant biology but also on the important cultural and social-ecological value of elephants living in their wild ecosystems. We support the right of these African states to speak for elephants within their natural range.

With the death of the Lahore Zoo's lone female elephant "Suzi" in May 13, 2017, who was kept alone for more than thirty years, we urge your Ministry not to acquire more elephants, but instead to follow the 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 facilities, as zoo directors realize that they cannot provide elephants with adequate facilities.

It is recognized that elephants already in captivity in Africa require careful treatment in order to rehabilitate and reintegrate them into wild habitats. These methodologies are now established and there are a number of options for returning the elephants to appropriate sanctuaries and reserves.

We call on the government of Pakistan to act in accordance with elephant biology, international and national legislation, and widespread and ever-increasing worldwide public opinion, to terminate plans for this elephant import.

Should additional information be required please address this to: Ms. Michele Pickover, EMS Foundation, michele@emsfoundation.org.za

Please accept, Excellency, the assurances of our highest consideration.

Yours sincerely,

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Suparna Baksi-Ganguly
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Dr Lucy Bates
Sussex University
Elephants Alive!

<p>Professor David Bilchitz University of Johannesburg, South Africa Director, South African Institute for Advanced Constitutional, Public, Human Rights and International Law Director, Animal Law Reform South Africa</p>
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<p>Megan Carr Vice-President, Global March For Elephants and Rhinos</p>
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