

Joyce Poole, PhD  
Director, ElephantVoices  
Buskellinga 3  
3236 Sandefjord  
Norway



Dr. Ladislaus Komba  
Permanent Secretary  
Ministry of Natural Resources and Tourism  
P.O. Box 9372  
Dar es Salaam  
[ps@mnr.go.tz](mailto:ps@mnr.go.tz)  
(Attn: Minister for Natural Resources and Tourism)

18 May 2010

**Dear Permanent Secretary,**

I am writing to you in my capacity as Director of ElephantVoices, as a world authority on the behaviour, welfare and conservation of elephants, and on behalf of the under-signed organisations and individuals.

It has recently been brought to our attention that the United Republic of Tanzania is undergoing a process to update its National Elephant Management Plan. As part of this exercise we humbly wish to recommend that Tanzania ban the practice of capturing live elephants for captive use for the following reasons:

**1. Capture of elephants from the wild is of no conservation benefit**

The IUCN issued the following clear statement opposing capture of wild elephants in 2003: *"Believing there to be no direct benefit for in situ conservation of African Elephants, the African Elephant Specialist Group of the IUCN Species Survival Commission does not endorse the removal of African Elephants from the wild for any captive use."*

**2. Breach of CITES requirements**

The elephant population of Tanzania is listed on Appendix I of CITES. This means elephants can only be exported if a finding has been made by the importing country that the specimen is **not** to be used for primarily commercial purposes.

The CITES Parties further defined primarily commercial purposes through adoption of CITES Resolution Conf. 5.10, which states that *"it is agreed that all uses whose non-commercial aspects do not clearly predominate shall be considered to be primarily commercial in nature with the result that the importation of specimens of Appendix-I species should not be permitted"*. Furthermore, the CITES Convention requires that an animal is only sent to a facility that is *"suitably equipped to house and care for it"*.

The conditions endured by the baby elephants that were captured in Tarangire last year, shipped to and now housed at the Karachi Zoo, do not meet either of these criteria. Press reports from Pakistan have indicated, for example, that the elephants may be used for commercial elephant rides. Indeed, simply displaying captive elephants in order to attract visitors is considered by many to be a practice that is primarily for commercial gain. Furthermore, the conditions at the Karachi Zoo are extremely substandard and are entirely inappropriate to meet even the most basic behavioural, environmental and social needs for the elephants sent there by Tanzania.

### **3. Capture and captivity are detrimental to the individual's welfare**

Following decades of in-depth scientific research on wild African elephants, we know that elephants are highly intelligent and have evolved extremely complex social behaviour and bonds. The capture of elephants from the wild, and specifically the removal of individual juvenile elephants from their families, has long been recognised as an unacceptable practice by elephant scientists and experts. This process is highly traumatic for both the captured individuals and their remaining family members.

The disruption of social bonds and the life-long incarceration of elephants in zoos, safari parks and circuses are the cause of enormous suffering to individuals. Recently published and internationally recognised scientific papers concerning elephants kept in European and US zoos confirm that elephants fare very poorly in captivity. They suffer from a multitude of captivity-related diseases and conditions including tuberculosis, herpes, obesity, and reproductive problems, disorders of the feet and joints as well as psychological stress. As a consequence, the average life span of African elephants in zoos in Europe is decades shorter than in the wild. The same applies to elephants in circuses.

### **4. New legislation – winds of change**

Due to the enormous welfare implications for elephants there is a global movement to stop the practice of capturing and of keeping elephants captive in this manner.

- In 2008, South Africa recognised the capture of wild elephants as an unethical practice. Following international consultations and in view of high profile lawsuits (e.g. the Tuli Case; Kwantu Judgement), the capture of elephant calves for captivity and for export to zoos and circuses, was banned.
- Last year, India banned the keeping of elephants in zoos.
- Many zoos in the United States are bowing to sound science and public opinion, closing their elephant exhibits and sending their occupants to sanctuaries. Likewise, around the world circuses that exhibit elephants are facing enormous public pressure, including lawsuits.
- Australia, Finland, Bolivia and Brazil have already banned the use of elephants in circuses, as have a growing number of cities around the world. Norway intends to ban the exhibit of elephants in circuses and the issue is being considered in the United Kingdom.
- The export and import of baby elephants destined for a life in captivity is extremely unpopular in the west.

### **5. Tanzania's image**

Whether CITES views such exports as acceptable has little bearing on the views of an increasingly discerning public, who cares about the welfare of animals, particularly of elephants.

Tanzania is internationally recognised as a country where wild elephants are respected. Hundreds of thousands of tourists from around the world visit every year to see elephants in a completely natural environment. The continued abduction of baby elephants from their families and their life-long incarceration for the purpose of entertainment hardly seems to fit this image.

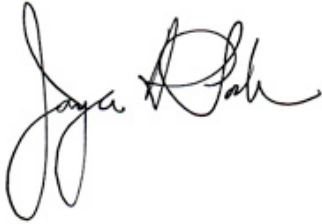
In the age of the Internet and social networks news and views travel fast. We urge you not to underestimate the impact on world opinion of the distressing sounds and imagery of elephant calves and juveniles being forcibly separated from their families, captured and then undergoing inhumane taming and training methods, and a lifetime of captivity. For an enlightened public, the practice of wild elephant capture for captivity is totally unacceptable. Continuation of this cruel practice is bound to lead to public petitions, campaigns, and increased negative publicity for Tanzania.

On the other hand, if Tanzania were to follow South Africa and introduce a ban on the further capture of live elephants, it is equally certain that the publicity generated would give Tanzania's image a major boost in the international media.

With a new Tanzania Elephant Management Plan currently being formulated, this is an ideal time for this change of policy to be implemented, to the great benefit of Tanzania's image abroad and, over the long-term, its valuable wildlife tourism industry.

We look forward to being able to commend Tanzania for banning the capture and export of elephants.

Respectfully,



**Joyce Poole**, PhD, Co-Director, Elephant Voices; Trustee and Scientific Advisory Committee, Amboseli Trust for Elephants

**Nick de Souza**, Regional Director – Africa, World Society for the Protection of Animals

**Stephen Chacha**, Programmes Manager (Member Society Development) World Society for the Protection of Animals, Africa

**Yohana Kasililah**, Chairperson, Tanzania Animal Protection Organization (TAPO)

**Thomas Kahema**, Dr. , Tanzania Animal Welfare Society (TAWESO)

**Johari Gessani**, Secretary General Tanzania Society for the Prevention of Cruelty to Animals (TSPCA)

**Ali Abdallah**, Chairperson, Zanzibar Society for the Prevention of Cruelty to Animals (ZNSPCA)

**Brenda St. George**, Chairperson, Dar Animal Haven (DAH)

**Petter Granli**, Co-Director, ElephantVoices

**Will Travers**, President, Species Survival Network and Co-Chair, SSN Elephant Working Group

**Shelley Waterland**, Born Free Foundation, Co-Chair of the SSN Elephant Working Group

**Marc Bekoff**, Professor emeritus, Ecology and Evolutionary Biology, University of Colorado, Boulder; Founder with Jane Goodall of Ethologists for the Ethical Treatment of Animals

**Pat Derby**, President, Performing Animal Welfare Society

**Gay Bradshaw**, PhD, PhD, Director, The Kerulos Center

**Don W. Elroy**, Director, Captive Wildlife Advocacy, S.A.E.N.

**Catherine Doyle**, Director-Elephant Campaign, In Defense of Animals

**Cynthia Moss**, Dr. Director, Amboseli Trust for Elephants; Founder Amboseli Elephant Research Project

**Keith Lindsay**, PhD, Scientific Advisory Committee, Amboseli Trust for Elephants

**Phyllis Lee**, PhD, Professor, Department of Psychology, Stirling University; Scientific Advisory Committee, Amboseli Trust for Elephants

**Harvey Croze**, PhD, Trustee and Scientific Advisory Committee, Amboseli Trust for Elephants

**Betsy Swart**, Executive Director US, Amboseli Trust for Elephants

**Lisa Kane**, Attorney and Co-Founder of the Coalition for Captive Elephant Well-Being

**Peter Stroud**, Zoological Consultant

**Adam Roberts**, Executive Vice-President, Born Free USA

**Rob Atkinson**, PhD, Royal Society for the Prevention of Cruelty to Animals

**Michael Tobias**, Ph.D., President & CEO, Dancing Star Foundation

**Jane Gray Morrison**, Senior Vice President, Dancing Star Foundation

**David Hancock**, Former Director, Woodland Park Zoo, Seattle, USA; Melbourne Zoo, and Werribee Open Range Zoo, Australia.

**Michele Pickover**, Coordinator, Animal Rights Africa

**Ross Minett**, Campaigns Director, Advocates for Animals

**Alan Knight**, OBE, Executive Director, International Animal Rescue

**Carol McKenna**, Director of Programmes, World Society for the Protection of Animals

**Glenys Oogjes**, Executive Director, Animals Australia

**Michael Kennedy**, Campaign Director, Humane Society International, Australia

**Rob Faber**, Chairman of the Board, Friends of the Elephant, Netherlands

**Butet Sitohang**, International Communications Officer, ProFauna Indonesia

**Poonam Dhanwatey**, Trustee, Tiger Research And Conservation Trust, India

**Mel Richardson**, Dr., Captive Wild Animal Consultant

**Erika Ceballos**, Founder and President, Campaigns Against the Cruelty to Animals (CATCA)

**Josphat Ngonyo**, Director, Animal Network for Animal Welfare

**Shirley McGreal**, Dr., OBE, Chairwoman International Primate Protection League

**Laura Zimprich**, animal public e.V.

**Mary Rice**, Executive Director, Environmental Investigation Agency

**Debbie Leahy**, Director of Captive Animals Rescue & Enforcement Department, PETA

**Winnie Kiiru**, Elephant Biologist

**Siri Martinsen**, Director, NOAH – for animal rights

**Shubhobroto Ghosh**, Former Project Coordinator of Indian Zoo Inquiry sponsored by Zoocheck Canada and independent animal welfare campaigner in India

**Jennifer Berengueras**, Project coordinator and International Relations Officer, FAADA, (Foundation for the Adoption, Sponsorship and Defence of Animals)

**Craig Redmond**, Campaigns Director, The Captive Animals' Protection Society

**Cathy Liss**, President, Animal Welfare Institute

**Vera Weber**, Director, Franz Weber Foundation, Switzerland

**Chris Palmer**, Professor, Wildlife film producer and author of *Shooting in the Wild*

cc:

Mr. Erasmus Tarimo  
Director of Wildlife  
Wildlife Division  
P.O. Box 1994  
Dar es Salaam  
[director@wildlife.go.tz](mailto:director@wildlife.go.tz)

Director General  
Tanzania National Parks  
P.O. Box 3134  
Arusha  
[tanapa@habari.co.tz](mailto:tanapa@habari.co.tz)