November 21, 2017

The Honorable Donald J. Trump
President of the United States
The White House
1600 Pennsylvania Avenue NW
Washington, DC 20500

Honorable Ryan Zinke
Secretary
Department of the Interior
1849 C Street, NW
Washington, DC 20240

Dear President Trump and Secretary Zinke:

Thank you for putting a hold on the November 17 decision once again allowing for the importation of sport-hunted elephant trophies into the United States. The Animal Welfare Institute respectfully requests that you permanently retain the ban on elephant trophy imports from Zimbabwe and Zambia.

By 1978, the number of elephants in Africa had plummeted to 1 million from between 3-5 million early in the 20th century, and they were listed as threatened under the US Endangered Species Act (ESA). However, loss of range and both legal hunting and poaching have continued to take their toll and total numbers now hover around 400,000. Zimbabwe’s elephant population has been depleted by six percent since 2007; in the northwestern region of Sebungwe, a stronghold for elephant trophy hunting, the population has decreased by a massive 74 percent. African elephants also face grave danger in Zambia; between 1972 and 2016 the species population plummeted from more than 200,000 to fewer than 22,000.

In an effort to halt this march towards extinction, in 2014 the U.S. Fish and Wildlife Service (FWS) issued a rule banning the importation of African elephant trophies into the United States. African elephants continue to face threats to their survival, and there is no credible scientific evidence that legal hunting enhances their conservation. A 2016 decision by the U.S. District Court of the District of Columbia upheld FWS’s 2014 ban, finding that sport hunting of elephants in Zimbabwe would not enhance the survival of the species.

Under the ESA, the FWS is required to prove that each import itself must enhance the survival of the species. Yet, it does not appear that either Zimbabwe or Zambia has significantly adjusted its management strategy for the species since the 2014 rule was put in place, nor can they meet the requirements established by the ESA to ensure that a threatened species is not further jeopardized. The upheaval in Zimbabwe makes the development, implementation, and regulation of a cogent conservation policy even more unlikely.

Maintaining continued protections and conservation efforts for threatened and endangered species is of utmost importance. Therefore, I hope you will seek further protection for the
threatened African elephant, by making permanent the ban on the importation of elephant trophies from Zimbabwe and Zambia.

Thank you for your consideration.

Sincerely,

Cathy Liss
President
Animal Welfare Institute