ATTACHMENT

Chart of Key Documents and Supporting Evidence

EXCERPTS FROM KEY DOCUMENTS IN SUPPORT OF THIS APPEAL

The charts below contain key quotations from some of the key documents submitted during the thirty-eight months of the suspension. These documents include ZPWMA responses to FWS information requests, reports from the CAMPFIRE Association, reports from safari hunting operators, and the letter from the AfESG, among others. The following charts are broken down by the sub-topics of the March 26, 2015 Finding. Issue-by-issue, the documents refute the alleged lack of data, reliance on "anecdotal" or "antidotal" information, and mistakes in the Finding and provide extensive documentation of enhancement.

All documents have previously been produced to the FWS including, most recently, in support of the applicants' request for reconsideration.

Management Plans

DOCUMENT NAME	SAMPLE OF KEY QUOTATIONS
ZPWMA Apr. 2014 Response	- The Authority supervises the implementation of the plan outside protected areas including communal areas, Conservancies, Forestry Commission area and private land. (p. 2)
ZPWMA Dec. 2014 Response	- 1.4 Has ZimParks established specific measurables of management actions for the goals identified in the management plan documents that will/are being taken? … Yes we have specific measurables of management actions for example: - i) Population parameters: numbers, Eg Aerial survey results, age, sex, distribution movement patterns through satellite tracking and collaring (through monitoring and surveys), trophy quality - ii) Law enforcement effort: Number of patrols, patrol nights, number of convictions, number of elephants poached, number of new Statutory Instruments approved - iii) Game water supple: number of boreholes working, number of elephant mortalities - iv) Fire management: Annual fire management plans developed and implemented, area burnt by unplanned fires, length of fireguards - v) Awareness programs: No. of awareness campaigns held, no. of people reached (p. 11-14)
ZPWMA July 2015 Response	- The population estimate from the 2014 aerial survey stands at 82,092 elephants. In the early 1900s the elephant population in Zimbabwe was estimated to be about 4,000. By 1980 the population had increased to an estimate of 46 426 elephants. The population continued to increase … twenty-fold … despite attempts to limit elephant population growth between 1960 and 1989 … The human population has also increased twenty-fold between 1900 and 2000, resulting in increased demand for land for

	agriculture and other forms of land-use outside protected areas thereby limiting the area available for elephants with a resultant increase in human elephant conflict … The high economic value conferred to the elephant through consumptive utilization has also resulted in increased tolerance by local communities. (p. 1) - Explanation of specifics of Elephant Management Plan (p. 9-19) - Zimbabwe has developed a number of national policies, as well as adopting regional and international protocols to address poaching. As explained the 17 April 2014 response to the USFWS poaching incidents are handled though a coordinated public-private response, including heightened law enforcement, severe deterrent sentencing, awareness campaigns, and substantial donations from the private sector to boost ranger and equipment capacity. Steps were also taken after the Hwange poisoning incidents to improve radio communications in that area, as well as establishing a new station with 15 rangers, to increase law enforcement coverage. Aerial surveillance in Hwange and other areas has been intensified. (p. 27) - It is one of the ZPWMA's policies to cooperate with safari operators, who provide significant assistance by alerting ZPWMA rangers to poaching threats; providing equipment, training and transport; and conducting their own anti-poaching patrols among other things. (p. 27)
ZPWMA, Elephant Management Plan 2015-2020	- The Role of Sport Hunting in Elephant Conservation: Elephants are a charismatic species but can also be destructive when they destroy crops, threaten livestock and even human lives. To have a future, elephants must have value. Value to the governing authorities and to the local people. The greater the value, the greater the tolerance of them is likely to be. The local people who live closest to them will determine the long-term survival of species like elephant. Regulated sport hunting converts wildlife into assets for the benefit of local people and the country as a whole. Wildlife can be a most valuable asset and in turn empower local communities and provide basic necessities. When it is viewed as a valuable asset, wildlife becomes an economically competitive land use in Zimbabwe, which leads to habitat preservation instead of habitat destruction and conversion to agriculture or livestock production. Game animals have a survival advantage because of user-pay stewardship systems where use revenue generated from tourist hunters is paid through to wildlife authorities and local communities. The presence of regulated hunting can also reduce illegal activities. Many hunting operators in Zimbabwe have specialised anti-poaching units. Private operators' lease agreements are being reviewed to include anti-poaching as an obligation of the concessionaire. Regulated hunting is the opposite of poaching. One is a lawful activity designed by government wildlife authorities and experts to perpetuate resources and the other is prohibited thievery outside of and away from the system. The first is like making a bank

	deposit and the second is like a bank robbery, without sustainable limits. Trophy hunting revenues are vital because there are not enough tourists to otherwise generate income to support all protected areas. Eco-tourism revenues are typically sufficient to cover the costs of only some of the parks and certainly not to justify wildlife as a land use outside of protected areas. Hunting is able to generate revenues under a wider range of scenarios than eco-tourism, including in remote areas lacking infra-structure, attractive scenery, or high densities of viewable wildlife. Consequently, elephant and other wildlife populations will be negatively affected through reduced conservation efforts arising from low funding and reduced goodwill from the communities, when in reality the elephant has the economic potential to raise adequate funds to support itself and other species. For these reasons, Zimbabwe confirms its commitment to the sustainable use of elephant and other wildlife in this Action Plan. (p. 12, Box 1) - v) Private sector: The corporate community participates in elephant management mainly through resource mobilization. Safari operators report poaching and assist in anti-poaching patrols. Through lease and trophy fees they provide revenue to ZPWMA. They help develop infrastructure, provide funds to communities and supplement diets with meat from trophy animals. Zimbabwe subscribes to the principle of sustainable utilisation of wildlife resources including elephants. Sport hunting is the principal form of wildlife utilisation whereby offtakes are adaptively managed and monitored through a participatory and science based process. This process allows for sustainable offtakes, and rigorous resource monitoring programmes that allow recruitment within a population to ensure the continued survival of the population in the wild. The high economic value conferred to the elephant through consumptive utilisation has also resulted in increased tolerance by local communities. (p. 12) - vi) Local communities: Local communities are involved in elephant management in CAMPFIRE areas, through sharing of information, advocacy and wildlife protection. They report human-elephant conflicts and carryout some of the conflict management activities. (p. 12-13) - The Importance of Community Based Conservation to the Future of Elephant Management in Zimbabwe: The Community Areas Management Programme for Indigenous Resources (CAMPFIRE) of Zimbabwe has been widely regarded as one of Africa's most successful contemporary conservation initiatives. It permits the residents of communal lands – basically the poor rural communities – to share in the benefits generated by wildlife utilization on those lands by granting Appropriate Authority to Rural District Councils (RDCs) to manage wildlife on communal lands and requiring a certain percentage of revenue to be paid to the wards and councils. CAMPFIRE operates in about 50,000 km2 (12.7%) of land in Zimbabwe. This is roughly equivalent landmass to the Parks and Wildlife Estate. CAMPFIRE encompasses about 777,000 households with an average family size of five, who face food insecurity and deep poverty (average income $1 a day). Between 1994 and 2012, CAMPFIRE generated $39 million of which $21.5 million was allocated to communities and used for resource management (22%), household benefits

	(26%), and community projects (52%). About 90% of CAMPFIRE's revenue comes from hunting, with elephant hunting contributing more than 70% of annual revenue. Based on the Constitution of the CAMPFIRE Association as amended in 2007, all major hunting RDCs use CAMPFIRE revenue-sharing guidelines. In these districts safari operators pay revenue directly into community-controlled bank accounts using the following breakdown: CAMPFIRE community share (55%), RDC fees (41%), CAMPFIRE Association levy (4%). Despite its achievements CAMPFIRE still faces fundamental challenges. In particular, the development strategies of households in CAMPFIRE areas focus on land uses that are incompatible with wildlife such as human immigration to rural areas, the extension of basic agricultural schemes and increased livestock numbers. Other CAMPFIRE challenges include: (i) the downturn in Zimbabwe's economy and tourism sector post-2000, (ii) great reliance on consumptive trophy hunting and less focus on other uses and non-consumptive uses of natural resources, (iii) increasing human populations averaging 16-20 people per km^2 in some key wildlife districts, and (iv) lack of re-investment in development, fixed assets, human capital, and management and protection of wildlife in CAMPFIRE areas. Despite these challenges, CAMPFIRE stands very high in the agenda of Zimbabwe's Government, and a review dedicated to improving the programme, including greater devolution of ownership of wildlife to communities, is ongoing and should be finalized by the end of 2015. Zimbabwe's Government recognizes that the survival of wild animals depends entirely on those among whom they live. Unless local people want to save them, wildlife will be poached to the point where just a few remain in fortified reserves. CAMPFIRE is meant to avoid this and the future of wildlife in communal areas rests on the success of this programme. (p. 12-13, Box 2) - 1.3.5 Links with continental (African Elephant Action Plan / SADC) and other regional initiatives: This Action Plan recognizes the existence of the African Elephant Action Plan and initiatives that are currently taking place at a continental level, including by the African Union. These include the development of the Common Strategy on Combating Illegal Exploitation and Illegal Trade in Wild Fauna and Flora in Africa. At the SADC level initiatives involve developing a Plan of Action and implementing the SADC Protocol on Wildlife Conservation and Law Enforcement. This Action Plan will be reviewed periodically in the light of developments that are taking place in the SADC Region, Africa and beyond. - 1.3.6 Regional strategies within Zimbabwe: The devolution of management oversight to regional levels, with more detailed action plans within the national plan, provides the basis for effective adaptive management at regional and local levels. As set forth in the framework below (Sections 3 and 4), four regional plans have been drafted to address the unique challenges of each region, and will implement the broader goals of this national Action Plan at a more specific level. In addition, Park-level plans for specific protected areas (including Hwange National Park, Mana Pools National Park, and Gonarezhou

	National Park) contribute to this Action Plan and govern the management of elephant within those protected areas. (p. 14) - 1.3.8 Human elephant conflict: As Zimbabwe's human population grows, elephant are being restricted to smaller areas and as their populations expand they increasingly move out of their designated habitat, and raid crops and sometimes threaten human lives. As a result in many rural areas where elephants exist in Zimbabwe, human-elephant conflicts are increasing, creating substantial negative attitudes to the conservation efforts of elephants. These are often among the poorest rural farmers, which makes the issue complex in social and economic terms. Unresolved conflicts stimulate poaching or retaliation. Poachers or retaliators can be seen as "local heroes" because they provide meat to the communities and resolve the conflict. A major challenge for elephant management is keeping human-elephant conflicts to a minimum. Developing a Social, Economic, and Cultural Framework has been identified as a Key Component of this Action Plan in an effort to address and reduce human-elephant conflicts. (p. 15) - Towards a Comprehensive Strategy to Reduce Human-Elephant Conflict: Some methods of reducing human-elephant conflict focus on curing the effects, not the cause. Such methods include chilli sprays, fences, and evening patrols to scare off marauding elephants. However, these are not necessarily long-term solutions. Long-term solutions require growing the tolerance of local communities for elephant by ensuring the communities benefit from having elephant on their lands. Tolerance is likely to increase if communities realise and appreciate economic returns earned from the sustainable use of elephant. Economic returns may be generated by consumptive and non-consumptive tourism. The devolution of decision-making on aspects of problem animal control to communities may result in better outcomes for the management of the costs and benefits of this activity. Problem animal control includes disturbing, removing, translocating, or ultimately killing those elephant that persist in damaging crops or threatening human life. Clearly, no one management option will successfully deal with all problem elephants and conflict situations. As part of this Action Plan, ZPWMA will undertake additional research on problem animal control and minimizing conflict, and will develop new solutions and a more comprehensive response to these issues. (p. 15, Box 4)
ZPWMA, Elephant Management Plan Supplement (2016)	- Table 1: Financial resources deployed up to August 2016 (p. 1) - Table 2: Other Non-Financial Resources (p. 2) - Progress towards Implementation of the Elephant Management Plan (2015 – 2020): Several milestones stated in the Elephant Management Plan have already been achieved which include the following: - Appointment of the Elephant Manager as in section 4.5 of the Zimbabwe Elephant Management Plan (2015 – 2020).

	- Getting a basic agreement of implementation in the 4 relevant regions. - Some work towards Law Enforcement, Monitoring, Investigations, Training and Community Relations. As of August 2016, more than USD 1 million had been spent on these activities. - Constraints and Challenges: One of the major challenges regarding implementation of the EMP is with regards to the adoption of stricter domestic measures by the United States of America. This has had the net effect of further reducing the revenue from hunting into the Authority, which therefore affects the budget allocated to resource protection, in particular the elephant in this case. One of the key impediments towards the full and comprehensive implementation of the Elephant Management Plan is the limited resources. However, Zimbabwe is at an advanced stage in the development of resource mobilisation strategies. These strategies include partnering with both local and international institutions in resourcing and financing aspects of the programme. (p. 2-3) - Priorities: Due to the fact that Zimbabwe is experiencing some funding constraints with respect to the full implementation of the Elephant Management Plan, which means therefore that it will not be possible to fully implement every aspect of the plan at the same time, we have developed a set of priorities (all drawn from the plan), that we feel are implementable and enable the work of conservation to proceed smoothly. - Law Enforcement: Law enforcement continues to be one of the most critical aspects of this strategy. From the perspective of the EMP, it has also to date been allocated the biggest budget (Table 1). While strategic gaps still exist with respect to the law enforcement capacity (the numbers of rangers on the ground are still in need of improving to effectively cover that Parks Estate, more patrol kits and equipment are still required to improve enforcement capacity). In order to effectively combat poaching and illegal trade the Law enforcement capabilities are top priority. - Monitoring: Biological monitoring and management, with respect to the priorities for this plan would come in as a second priority. This enables monitoring programmes and research to support science based adaptive management of elephants in this action plan. The resource allocation to this activity needs to be dramatically improved, although innovations have had to be put in place to manage that insufficient resource allocation. Rangers on patrol also carry out significant monitoring activities which feed into the biological monitoring and management of the elephants. - Investigations/Intelligence: The investigations capacity (together with training) are critical components of this action plan. To date of the available resources, allocations to investigations have been minimal. Innovations have also been developed in this area, for support from various private players, institutions and state institutions in the investigative processes. (p. 3)

	- Appointment of Elephant Manager: While the appointment of the National Elephant Manager has been concluded (April 2016) to enhance implementation, monitoring and evaluation of the Action Plan, funding constraints still exists. Some funding for the activities of the Elephant Manager have been unlocked through cooperation with stakeholders in the monitoring and evaluation activities of the office. This includes setting up of the Regional Elephant Management Committees and funding their activities. (p. 4) - Four annexes – status of implementation of each regional elephant management plan

Population Status

DOCUMENT NAME	SAMPLE OF KEY QUOTATIONS
ZPWMA Apr. 2014 Response	- Information on the status of elephants is derived from surveys which include, aerial, water-hole, road strip, walking transects, visitor observations /sightings and ranger based monitoring. (p. 1) - Currently the Authority is in the process of planning a national aerial survey in the dry season of 2014… (p. 4)
ZPWMA Dec. 2014 Response	- Population estimates for elephants are determined through various methodologies which include: aerial surveys, water hole counts, road strip counts and ranger based monitoring. Waterhole counts are conducted for Hwange and Mana Pools on an annual basis. A national aerial survey of elephants was conducted in 2014 as part of the Pan African Aerial Survey for Elephants. Monitoring of trends in trophy quality and other forms of utilization are on-going programs. Results from the monitoring are used to adjust hunting quotas in order to achieve the desired levels of trophy quality. (p. 2) - In addition to aerial surveys, the Authority conducts regular waterhole counts and road strip counts. Water hole surveys, for instance, provide valuable information which can be used to make decisions in the absence of aerial survey data. A good example is the general increase of the Hwange elephant population shown by water hole counts that have been conducted annually from 1972 to 20 14. (p. 15)
ZPWMA July 2015 Response	- The population estimate from the 2014 aerial survey stands at 82,092 elephants [and attaching survey results]. In the early 1900s the elephant population in Zimbabwe was estimated to be about 4,000. By 1980 the population had increased to an estimate of 46 426 elephants. The population continued to increase … twenty-fold … despite attempts to limit elephant population growth between 1960 and 1989 … The human population has also increased twenty-fold between 1900 and 2000, resulting in increased demand for land for agriculture and other forms of land-use outside protected areas thereby limiting the

area available for elephants with a resultant increase in human elephant conflict … The high economic value conferred to the elephant through consumptive utilization has also resulted in increased tolerance by local communities. (p. 1)

- Table 4a & 4b: MIKE data 2000-2014 (p. 25)

Chewore

	2010	2011	2012	2013	2014
Total Carcasses	29	51	43	91	52
# Illegally Killed	4	34	34	36	9
PIKE	0.14	0.67	0.79	0.40	0.17

NyamiNyami

	2010	2011	2012	2013	2014
Total Carcasses	19	16	52	36	27
# Illegally Killed	19	13	14	8	10
PIKE	1.00	0.81	0.27	0.22	0.37

ZPWMA, Non-Detriment Finding (2014)

- In Zimbabwe, despite the threat of poaching in some areas, the elephant populations have continued to increase in all the protected areas as indicated in Tables 4 and 5. Illegal off-takes remain at a low level. The major threat to the survival of viable populations is habitat loss and fragmentation outside protected areas due to the expansion of human settlements and agriculture. The protected areas within the Sebungwe region (Fig 1), for example, are relatively small (less than 10,000 km^2) and surrounded by communal lands. The existence of a hard edge between such protected areas and communal lands leads to serious human/elephant conflicts. Healthy and viable populations inside protected areas are depended on the existence of suitable habitats in communal areas. (p. 19)

IUCN AFESG Letter

- … on the basis of the AfESG's 2013 Provisional Status Report, the USFWS enhancement finding indicated that no surveys had been conducted in Hwange National Park … but in fact, a survey had been completed in 2007 … this survey was listed in the "New Surveys" portion of the AED website … the estimate … (financed by the USFWS) was 39,765 elephants … which would have added over 30,000 elephants to the DEFINITE category and changed the distribution of elephants across all data categories. (p. 2)
- There are four other instances in which the use of data from the AED presented within the finding's "Population Status" section demonstrated oversights or misinterpretations, as well as a fifth instance meriting clarification. First, the finding stated, "Several areas that were covered in the current surveys

	(2006-2010) indicate that there has been a substantial decline in the population" (page 6). The AED shows, however, that three surveys carried out in this period … estimated higher totals than their respective previous, comparable surveys [and pointing out that these four surveys plus the NW Matabeleland survey all dated since 2006 and exceeded 70,000 elephants] … As a result, we do not find support for the claim that these four surveys from 2006 to 2010 indicate a substantial population decline, nor do we understand the basis for this statement in the enhancement finding. (p. 2) - Even if all of these elephants [in the Save Valley survey] were double counted, which is highly unlikely, the total number would decline from 1,538 to 1,492 – a figure still higher than any previous counts of the area. (p. 3) - Additionally, the finding states that "A carcass ratio of less than 4% … is considered unrealistically low…" The first sentence suggests a conflation of carcass ratios from aerial surveys and mortality rates, and its conclusion is unwarranted… In the opinion of our DRWG, 4% seems a reasonable figure for a population not particularly affected by poaching. (p. 3) - Fourth, … the finding's comment that "only 304 definite animals were counted by aerial or ground counts" …, considering methodology within the DEFINITE category, is not relevant; and as stated in the next section, sample counts are not inferior to total counts. (p. 3) - [T]he USFWS also presented statements regarding the appropriateness of Zimbabwe's survey methodology … Our opinion … is that the methodological approaches applied in Zimbabwe are both adequate to estimate elephant population numbers and to allow the most consistent possible means for comparing these numbers over time. (p. 3-4) - [T]he enhancement finding suggests the incorporation of new technology as being necessary to improve estimate accuracy … This statement disregards the well-recognised and accepted advantages to maintaining consistent survey methods while indirectly implying the approach undertaken in Zimbabwe has been somehow sub-standard. While it is always the case that some improvements in accuracy might result from the use of new techniques, it is generally recognized that the survey techniques used in Zimbabwe are of a high standard and have been consistently applied over time. (p. 4) - Despite the fact that PIKE data for 2012 has been available … and updated findings for 2013 were posted … nearly a month before the enhancement finding was updated, the finding stated that 2012 and 2013 data were not available. (p. 4-5)
SOAZ Report	- We have received information from fourteen safari operators in Zimbabwe. The operations of these companies cover a wide range of safari concessions including Government Safaris Areas, Campfire Areas and Private Conservancies. They also include safari concessions in the three main wildlife systems in

	Zimbabwe being; (1) Zambezi Valley and Sebungwe, (2) the North West including Hwange/Matetsi/Vic Falls and (3) the South & South East Lowveld including Gonarezhou, Save Valley Conservancy & Bubye Conservancy. (p. 1) - The members of SOAZ do not believe that the national population of elephant is in decline or under threat as a result of poaching. On consultation with our members, most populations would appear to be increasing or stable. There does seem to be concern about the elephant population in the Sebungwe region where the impact of poaching is indicated as significant. While much of this information is anecdotal and not based on scientific survey, we are confident that in the vast majority of safari areas throughout the country, the elephant population is not significantly declining or under threat. (p. 4) - While National Parks provide the primary refuge for elephant populations in Zimbabwe, a significant proportion of elephant live in the safari areas which are generally more marginal in terms of wildlife numbers and often have large rural human populations within or adjacent to them. The role of safari operations in providing a benefit to such communities and enforcing anti poaching as a means of maintaining elephant and other wildlife populations in these areas cannot be underestimated. (p. 4)

Regulations and Enforcement

<table>
<tr><th>DOCUMENT NAME</th><th>SAMPLE OF KEY QUOTATIONS</th></tr>
<tr><td>ZPWMA Apr. 2014 Response</td><td>- (p. 12):
<table>
<tr><td>Year</td><td>2009</td><td>2010</td><td>2011</td><td>2012</td><td>2013</td></tr>
<tr><td>No. of Elephants Poached</td><td>145</td><td>77</td><td>223</td><td>212</td><td>293</td></tr>
</table>
- It is however important to note that although the trends in poaching have increased in recent years, the impact of poaching on the national elephant population is not significant. The Government of Zimbabwe reacted swiftly to the unprecedented elephant poisoning incident in Hwange National Park in 2013. A private sector driven fund raising initiative was set up which has to date managed to mobilize 21 vehicles, communication and field equipment for enhanced law enforcement. The ZPWMA has increased manpower level for Hwange and other protected areas through a massive recruitment drive. The police and the judiciary also actively collaborated with the ZPWMA in apprehending all 35 poachers that were involved in the elephant poisoning... (p. 13)
- Summary of arrests and prosecution of elephant poaching cases for period between 2011 and 2013 (p. 14)</td></tr>
</table>

	- The Parks and Wildlife Act Chapter 20:14 … recognises any land that is being used for wildlife conservation and designates the legal occupant of that land as Appropriate Authority. On communal lands/tribal Appropriate Authority is accorded to the Rural District Council. Appropriate Authority is the legal right to utilize and manage wildlife on the property under community jurisdiction. (p. 15-16)
ZPWMA Dec. 2014 Response	- Law enforcement activities are carried out in and outside protected areas through various strategies including extended, daily and strategic patrols in the elephant range areas. There are also regular training exercises in basic, intermediate and advanced anti-poaching tactics for the rangers as part of management activities to improve law enforcement. Rapid response anti-poaching units who have specialized training for deployment to high risk areas have been constituted as a result of the training activities. In 2013, countrywide law enforcement efforts resulted in the detection of a large number of poacher incursions and armed contacts including recovery of poached wildlife specimens and ammunition. In the same year, there were 27 armed contacts that resulted in 9 poachers being killed during field operations, whilst recoveries from poachers and illegal traders included 35 rifles, 1000 rounds of ammunition, 9 rhino horns and 491 elephant tusks. (p. 2) - There are no amendments to land tenure however, the elephant range extends into large areas of communal lands which form part of the migratory routes. Elephants are also found on private land where there is enough space for relatively sizable populations, e.g. in Conservancies. In most cases there is connectivity from core protected areas to communal areas under CAMPFIRE and to private farms, in some cases. The elephant range and migration corridors have been extended through the TFCA program—a regional policy initiative which Zimbabwe is implementing in collaboration with its neighbours. Currently Zimbabwe is pursuing six TFCA initiatives. Most of Zimbabwe's large protected areas are on the countries boundaries and the elephant populations are linked to these neighbouring countries' boundaries and as such, creation of these large conservation areas is a viable option for elephant range expansion. In doing so, Zimbabwe is implementing a policy direction adopted at a regional level to increase the habitat available to wildlife including elephants. (p. 11) - The Authority has successfully lobbied the Judiciary for stiffer penalties for wildlife crime including poaching … The measurable indicators include number of Statutory Instruments (SI) that have been gazetted, for example SI 45 of 2014. Capacity building workshops to improve investigations and prosecution of wildlife crime are conducted in partnerships with NGOs and these are also measurable indicators of management actions. (p. 13-14) - Table 1 shows the number and trends in elephant poaching in the parks estate since 2012 to October 2014. (p. 15)

ZPWMA July 2015 Response	- ZPWMA has a staff complement of 1,500 field rangers whose core mandate is anti-poaching activities. Table 5 below is an indicative budget for effective protection of the Parks and Wildlife Estates. Table 5: Budget for anti-poaching activities (p. 34-35) - Table 6: Summary of Serious Wildlife Crime Cases recorded in Zimbabwe (p. 35-36)
ZPWMA, Non-Detriment Finding (2014)	- Elephant poaching in Zimbabwe is relatively low but trends have been increasing in recent years … The conviction rate for the period under review (2011-2014 February) is 69% of locals and 95% of foreigners arrested. The high conviction rates indicate the level of understanding and appreciation of the elephant value by judiciary. Elephant poaching and illegal possession of elephant products are classified as an economic crime which carry a mandatory sentence of not less than nine years on conviction. The provision of a mandatory imprisonment of not less than nine years crimes as provided for in the General Laws Amendment Act (No. 5) of 2010 ensures deterrent sentences for poaching. (p. 19-20)
CAMPFIRE—Role of Hunting Report	- In 1982, the government amended the 1975 Parks and Wildlife Act to enable Rural District Councils (RDCs) to obtain 'appropriate authority' (AA) to utilize wildlife for commercial gain … This Act provided an opportunity to extend to communities in the Communal Lands the benefits that the private landowners enjoyed as a result of the 1975 Parks and Wild Life Act. This eventually led to the birth of Zimbabwe's Community Areas Management Program for Indigenous Resources (CAMPFIRE), which had far reaching impacts on wildlife productivity as well as the socio-economic wellbeing of CAMPFIRE communities. (p. 2) - The CAMPFIRE program was conceptually designed to focus on wildlife, woodlands, water, grazing resources, and grasslands. In practice, it focused on managing wildlife because of the direct monetary benefits which this resource offered to producer communities. The CAMPFIRE concept … was developed in response to the realization that unless communities living adjacent to National Parks can obtain direct value from wildlife, they will not protect the wildlife. These communities would also need to have a much greater say in how those benefits would be derived and utilized. (p. 2)
SOAZ Report	- We have received information from fourteen safari operators in Zimbabwe. The operations of these companies cover a wide range of safari concessions including Government Safaris Areas, Campfire Areas and Private Conservancies. They also include safari concessions in the three main wildlife systems in Zimbabwe being; (1) Zambezi Valley and Sebungwe, (2) the North West including Hwange/Matetsi/Vic Falls and (3) the South & South East Lowveld including Gonarezhou, Save Valley Conservancy & Bubye Conservancy. (p. 1)

<table>
<tr><td></td><td>- Table 2 shows that the 14 Safari Operators that responded to the questionnaire spent a combined total of $957,843.00 on anti poaching in their areas and this employs 245 people specifically for anti poaching. (p. 4)
- Table 2. The expenditure on Anti Poaching and number of Anti Poaching personnel employed by 14 Safari Operators in Zimbabwe (p. 4)
<table>
<tr><th>Anti Poaching expenditure – 2013</th><th>Anti Poaching Personnel Employed</th></tr>
<tr><td>US$957,843.00</td><td>245</td></tr>
</table>
- As in Section 3, if these figures are extrapolated out to give figures relative to the 160 sport hunted elephant imported into the USA each year from Zimbabwe, we can make the assumption that US hunters are assisting with the funding of $1,388,872.35 towards anti poaching in Zimbabwe through their safari payments and that this is enabling the employment of 355 anti poaching personnel along with all the equipment and support required. The imposed suspension on the import of sport hunted elephant into the USA from Zimbabwe will have a significant detrimental impact on these figures and in many cases the anti poaching efforts will not be sustained. (p. 4)</td></tr>
<tr><td></td><td></td></tr>
<tr><td>FWS Press Release</td><td>- In Zimbabwe, available data, though limited, indicate a significant decline in the elephant population. Anecdotal evidence, such as the widely publicized poisoning last year of 300 elephants in Hwange National Park, suggests that Zimbabwe’s elephants are also under siege.
- Legal, well-regulated sport hunting, as part of a sound management program, can benefit the conservation of listed species by providing incentives to local communities to conserve the species and by putting much-needed revenue back into conservation. At this time, the Service does not have conservation concerns with African elephant sport hunting in Namibia, South Africa, or Botswana; though it should be noted that Botswana is not currently open to elephant sport hunting.</td></tr>
</table>

Sustainable Use

DOCUMENT NAME	SAMPLE OF KEY QUOTATIONS
ZPWMA Apr. 2014 Response	- Allocation of quotas in hunting areas is based on a consultative process that involves ZPWMA authorities, hunters, safari operators, local communities, land owners, researchers, and NGOs. The participatory approach ensures that the quotas allocated for each hunting area are sustainable. (p. 4) - Factors considered for quota-setting annually (p. 20-22)

ZPWMA Dec. 2014 Response	- The quota-setting process is participatory involving private landowners, ZimParks and CAMPFIRE or local community wildlife managers. Quotas are set so as to have a representative number of animals that can be safely removed during a hunting season without inflicting biological damage to the population. The aim of quotas is to ensure that the utilization of wildlife is sustainable. Data on genetic drift, estimated population, disease outbreak, trophy size, age of animal hunted, habitat status and illegal offtake is used to safeguard sustainable quotas … Trophy quality is monitored and quotas are adjusted in order to maintain desired trophy quality. (p. 7-8) - As an example in 2014 to date over 90 cases of PAC have been reported whilst only 37 elephants have been killed. This is in line with the annual average offtake of 40 individuals [as PAC]. It is therefore not true to state that the number of elephants taken on PAC is equal to or may exceed the number of elephants taken on sport hunting. (p. 23) - In Zimbabwe, the quota setting process is participatory. This participatory quota setting process is ideal as it aims at having a co management approach where all the relevant stake holders become active participants who complement the Authority's efforts. Inputs into the quota setting process includes population estimates, densities, distribution patterns, habitat quality, trophy quality, hunting success rate, ranger based monitoring reports, environmental variations, natural mortality, capture and translocations, diseases, size of hunting area, management systems in place, CITES National Export quotas, trade and export data. Before any hunting takes place in Zimbabwe, the hunter has to have a hunting quota which will have been determined through an annual transparent consultative quota setting workshops. The workshops are done at local community and property level first and foremost. At this level stakeholders include: field managers, safari operators, technical specialists and local community. Secondly, the process then goes to a national quota setting level where the Scientific Authority in this case ZIMPARKS ecologists and all other stakeholders will be present. The Scientific Authority through an adaptive management process and rigorous resource monitoring programme, uses all the information generated to ensure that all off-takes are sustainable. Quotas can be reduced to allow recruitment into a population if there is a decline in trophy quality or low hunting success rate and other factors such as poaching. Quotas are therefore adjusted annually in response to prevailing conditions. As an example, the proposed 2015 sport hunting quotas were set in consultative workshops held at various centres around the country using a participatory approach taking into account factors that influence the ecological viability of the hunted species such as population numbers, spatial distribution, management practices (especially for private properties), illegal harvest levels, offtake rates (hunting success) and trophy quality trends. Preliminary results of the just concluded aerial census of elephants and other mega herbivores, trophy quality trends and offtake rates from the TR2 database were the main sources of information for input into the quota determination process. Overall, there

	were downward revisions for quotas for all the major species in the year 2015 except for crocodile. The proposed 2015 quotas for the other major species are as follows, (for comparison, 2014 quota are in brackets); Elephant 380 (500), Buffalo 1 268 (1 363), Leopard 500 (483) and Lion 74 (99). (p. 23-24)
ZPWMA July 2015 Response	- Elephant mortalities were recorded under various categories as shown in Table 9 below. The major causes of mortalities over the five year period are natural, poaching and sport hunting. It should be noted that other management off-takes entail ration and training quotas which were set at about 95 animals nationally for ZPWMA run areas. (p. 43) - Table 9: Causes of elephant death from 2010 to 2015 (p. 43) - Trophy hunting of elephants, or any wildlife species in Zimbabwe, is undertaken through a strictly regulated quota setting system. Quotas are issued each year to approved landholders by ZPWMA and this is done through national quota setting workshops. These workshops rely on information supplied by landholders as well as ecological reports submitted by Parks' ecologists and independent wildlife consultants … All offtakes for the African elephant in Zimbabwe are sustainable. Key factors that Zimbabwe considers when setting quotas are shown in the Table 10. (p. 43-44) - Table 10: Quota allocation for 2014 by major range (p. 44) - Table 11: Factors considered in quota setting (p. 44-46) - Quotas are set so as to have a representative number of animals that can be safely removed during a hunting season without inflicting biological damage to the population. The aim of quotas is to ensure that the utilization of wildlife is sustainable. Data on genetic drift, estimated population, disease outbreak, trophy size, age of animal hunted, habitat status and illegal off take is used to safeguard sustainable quotas. On average, quotas are set based on current data at approximately. The quota for 2016 is set at 400 elephant which is 0.49% of the national population. (p. 46) - Figure 8: Multi stakeholder participatory quota setting (p. 47)
ZPWMA, Non-Detriment Finding (2014)	- Trophy hunting of elephants is undertaken through a strictly regulated quota system. Quotas are issued each year to approved landholders by the Zimbabwe Parks and Wildlife Management Authority and non-detriment findings are conducted for all exports. Policies and legislation related to utilization of the African elephant are strictly adhered to and implemented. In areas where there is a decline in trophy quality, a hunting moratorium can be imposed to allow the population to recover as was the case with African lions North West Matabeleland from 2004 to 2008. Quotas are also reduced in areas where

	there is a decline in trophy quality. All the off-takes for the African elephant in Zimbabwe are sustainable. Key factors that Zimbabwe considers when setting quotas are shown in Table 8. (p. 25) - Table 8: Some key factors considered in quota setting (p. 26) - Figure 8: Export of sport hunted elephant trophies from Zimbabwe (2008 – 2013) Source: (TR2 Database ZPWMA 2014) (p. 31) - The ZPWMA has a comprehensive system to monitor off-takes from the elephant population. All field stations report on a monthly basis, animals killed through all forms of offtake. Safari operators are required by law to submit returns to the ZPWMA of all the animals taken through a Tourism Hunt Return Form (TR2). All elephants killed through Problem Animal Control (PAC) and recreational hunting are considered as part of the annual off-take quota to ensure that the offtakes are sustainable. Trophies taken on PAC cannot be exported. (p. 31) - Some elephants are taken in communal areas during problem animal management but the off-takes other very low and insignificant. In addition to problem elephant management, other elephant off takes are for training of ZPWMA staff and professional hunters on how to handle dangerous game and again the numbers are very low and insignificant. Private properties have approved Elephant Management Plans but apply for annual sport hunting and management quotas. For example, Save Valley Conservancy has an approved Elephant Management Plan for its closed elephant population. The elephant population is increasing in this closed system. On this private property, culling is done on an annual basis as a management tool to control the elephant population… (p. 31-32) - CONCLUSION: In view of the foregoing, Zimbabwe is making use of the best available scientific information on the status of the African elephant in the country to make non-detriment findings. The current harvest levels are not detrimental to the survival of the species. It is also evident that both quantitative and qualitative data is used in the decisionmaking process. The African elephant population in Zimbabwe is growing and that current levels of trade are not detrimental to the survival of the African elephant in the wild. The species exists and is well monitored throughout its range. In most of the areas where the elephant occurs however there is local over-abundance and severe habitat conversion. The Government of Zimbabwe has recently revised its policies and legislation to promote wildlife conservation and to support local community development programmes. Levels of harvest and quotas for the African elephant are determined through an adaptive management approach, using baseline data, monitoring the impacts of previous harvests and responding to environmental variations. It is evident that quotas and offtake levels for the African elephant fall within very safe and sustainable limits in Zimbabwe. Protocols for monitoring are in place but significant resources are required to carry out regular national aerial surveys. Efforts by the Government of Zimbabwe through the strict management

	regimes and trade controls promote the conservation of not only African elephant but other wildlife species. (p. 49-50)

ZPWMA, Legal Trade, Conservation and Rural Livelihoods: A Zimbabwean Perspective	- A hunting quota is a scientifically determined system of harvesting animals from a population without compromising its biological proliferation. In Zimbabwe determination and implementation of hunting quotas goes through a rigorous quota setting methodology that entails factoring population sizes, property (area) sizes, habitats, national policies among other parameters. With all the set parameters met, it is anticipated that biodiversity and hunting industry are sustained and the economy improves as the country maintains its position as a prime hunting destination. (p. 5)
	- [Factors considered in quota-setting (p. 6)]
	  - 1. CITES National Quota
	  - 2. National aerial survey results
	  - 3. Research publications and preliminary results
	  - 4. Off takes for key species including leopards, lion and elephant
	  - 5. Size of property relative to the species requested and distribution
	  - 6. Illegal Off-take/Poaching
	  - 7. Property based Ecological assessments
	  - 8. Management regime on the properties (habitat, fire, water, land-use planning and zonation, fencing, supplementary feeding).
	  - 9. Human wildlife Conflict hotspots, Communal Benefits and conflict mitigation
	  - 10. Species sensitivity
	  - 11. Other off-takes (illegal management offtakes, live sells)
	  - 12. Trophy Quality
	  - 13. Habitat Change/fragmentation
	  - 14. Recommended sustainable off-take levels
	  - 15. Offtake Data

CAMPFIRE Association Report	- A participatory quota setting methodology adaptively adjusts quotas in response to animal numbers, trophy quality, community monitoring, illegal off-take and safari operator “catch effort”. (p. 3)
CAMPFIRE Income Analysis	- Figure 7: Numerical Elephant Quota and Take Off per District (p. 7)

SOAZ Report	- It is estimated that trophies of 160 sport hunted elephant are imported into the USA from Zimbabwe each year. If the information in Table 1 is extrapolated out for a quota of 160 elephant (I.e. multiply each figure by a factor of 1.45) then we can assume that the financial loss to Zimbabwe of the suspension will be in the region $4,878,452.50. It will have a direct impact on 126 Operators and Professional Hunters, 1132 staff, 355 anti poaching personnel and approximately 155,000 people living in rural communities. (p. 3)

Revenue Utilization

DOCUMENT NAME	SAMPLE OF KEY QUOTATIONS
ZPWMA Apr. 2014 Response	- The Parks and Wildlife Act Chapter 20:14 … recognises any land that is being used for wildlife conservation and designates the legal occupant of that land as Appropriate Authority. On communal lands/tribal Appropriate Authority is accorded to the Rural District Council. Appropriate Authority is the legal right to utilize and manage wildlife on the property under community jurisdiction. (p. 15-16) - The Zimbabwe Parks and Wildlife Management Authority, which is the Government's Agency responsible for managing all wildlife in the country ploughs back all the money into managing conservation and protection of the Parks Estate, which includes the range areas for elephants. (p. 25)
ZPWMA Dec. 2014 Response	- The Parks and Wildlife Act accorded Appropriate Authority status to communal and private property areas with significant wildlife populations which confer user rights to the property owners. Appropriate Authority allows the property owners or tenants to manage and benefit from the wildlife on their land. Local communities through CAMPFIRE programs participate in quota setting workshops in which local communities get the opportunity to learn wildlife management practices from the various technocrats who will be presenting their game management practices. The local communities also get an opportunity to market their offtake to safari operators, which if they get a hunting client, proceeds, are remitted to the community thereby improving their livelihoods. This arrangement incentivizes landowners and tenants to not only tolerate wildlife, but to conserve and promote conservation and protection of wildlife. ZPWMA also provides para-military training to Rural District Council game guards, to equip them with law enforcement and anti-poaching techniques. In the communal areas, ZPWMA is working towards increasing its network of informers to assist in intelligence gathering, a vital tool in the fight against poaching. (p. 20) - The current operating budget is estimated to be in excess of USD28 million. (p. 20)

	- Elephant hunting contributes in excess of USD$ 14 million every year … Approximately, 67% of the annual elephant export quota is allocated to local communities and private sectors with more than half of this going to local communities. It is worth noting that elephants contribute approximately 60% of total hunting revenue by Rural District Councils. Approximately 30% of the Authority's revenue is from hunting, of which the elephant is the major contributor. (p. 21)
ZPWMA July 2015 Response	- ZPWMA has a staff complement of 1,500 field rangers whose core mandate is anti-poaching activities. Table 5 below is an indicative budget for effective protection of the Parks and Wildlife Estates. Table 5: Budget for anti-poaching activities (p. 34-35) - The major sources of [budget] funds [for ZPWMA] are conservation fees (land and river) constituting a total of US$9 898 695 and hunting constituting a total of US$ 4 032 733 for 2014. The bulk of the revenue generated in ZPWMA goes towards staff costs (69%) and operation costs (18%) which translated to US$17,751,988 and USS 4,706,787 respectively for 2014 … Full details are specified in the attached approved budgets for 2015 (p. 36) - Table 7a: ZPWMA Actual and projected Budgets for 2014 and 2015 in USS (p. 37) - Table 7b: Expenditure for ZPWMA (p. 37) - Conservation fees (Park entry and fishing permits) and hunting revenue constitute the bulk of the sources of revenue for ZPWMA, with a contribution of 42% and 17% respectively. (p. 38) - Figure 5a: Main Sources of Revenue for 2014 (p. 38) - Figure 5b: Itemized costs for ZPWMA … Note: See attached approved budgets for 2015 for budget details. (p. 39) - The US hunting market constituted 51% and 54% of the elephant trophy hunting in Zimbabwe for the years 2013 and 2014 respectively. (p. 40) - Figure 6a: Source markets for Safari Hunting in Zimbabwe in 2013 from ZPWMA Database (p. 40) - Figure 7: Source markets for Sport Hunting in Zimbabwe in 2014 from ZPWMA Database (p. 41) - Hunting revenue is distributed by land-use categories as to sustain the upkeep of the land area where it is accrued. These land areas administered by different authorities with the ZPWMA having the overall authority to oversee wildlife use on these areas … Over a four year period revenue collected from hunting contributed a total of US$ 21,339,609. There was a 11.9% decrease in revenue collection from hunting in 2014 compared to 2013. Of all the hunting received the American market is estimated to 54% and is inclusive of concession fees and trophy fees. (p. 41)

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- Table 8a: Revenue collected from hunting within the parks Estate 2011 to 2014. (p. 41)
<table>
<tr><td></td><td>2011</td><td>2012</td><td>2013</td><td>2014</td><td>Totals</td></tr>
<tr><td>Total hunting revenue</td><td>5,362,198</td><td>5,144,579</td><td>5,760,339</td><td>5,072,493</td><td>21,339,609</td></tr>
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- Across all land categories, the elephant, even in the private land category where only a small proportion of properties have elephants, accounts for the highest proportion of revenue. Table 12 below highlights elephant populations and revenue generated in the four land use categories in terms of trophy fees … The most important form of revenue is the trophy fees, which average US$ 10,000 per trophy elephant. Other forms of revenue include hunting daily rates and incidental revenue which can raise the value of an elephant hunt up to $25,000.00. (p. 48)
- Table 13: Staff costs incurred in Safari Areas (p. 49)
- The communal areas benefits from wildlife through the CAMPFIRE program. This program is key in that it helps to encourage the communities to co-existence with wildlife. (p. 50)
- During the 2014 hunting season, a total of about US$ 1,419,384.00 (costs including trophy fees, daily rates and concession fees) was realized as revenue from elephant hunts under the CAMPFIRE program. Revenue generated from the CAMPFIRE program is ploughed back into managing and protecting the wildlife resource through activities such as anti-poaching patrols, wildlife censuses and problem animal control (PAC), and wildlife surveys. … Table 14: Distribution of Revenue between Communities, RDC and CAMPFIRE Association. (p. 50-51)
- Table 15: The Distribution of CAMPFIRE Revenue by Communities. (p. 51)
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<tr><td>ZPWMA, Elephant Management Plan (2015-2020)</td><td>
- vi) Local communities: Local communities are involved in elephant management in CAMPFIRE areas, through sharing of information, advocacy and wildlife protection. They report human-elephant conflicts and carryout some of the conflict management activities. (p. 12-13)
- The Importance of Community Based Conservation to the Future of Elephant Management in Zimbabwe: The Community Areas Management Programme for Indigenous Resources (CAMPFIRE) of Zimbabwe has been widely regarded as one of Africa's most successful contemporary conservation initiatives. It permits the residents of communal lands – basically the poor rural communities – to share in the benefits generated by wildlife utilization on those lands by granting Appropriate Authority to Rural District Councils (RDCs) to manage wildlife on communal lands and requiring a certain percentage of revenue to be paid to the wards and councils. CAMPFIRE operates in about 50,000 km2 (12.7%) of land in Zimbabwe. This is roughly equivalent landmass to the Parks and Wildlife Estate. CAMPFIRE encompasses about 777,000 households with an average family size of five, who face food insecurity and deep poverty
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	(average income $1 a day). Between 1994 and 2012, CAMPFIRE generated $39 million of which $21.5 million was allocated to communities and used for resource management (22%), household benefits (26%), and community projects (52%). About 90% of CAMPFIRE's revenue comes from hunting, with elephant hunting contributing more than 70% of annual revenue. Based on the Constitution of the CAMPFIRE Association as amended in 2007, all major hunting RDCs use CAMPFIRE revenue-sharing guidelines. In these districts safari operators pay revenue directly into community-controlled bank accounts using the following breakdown: CAMPFIRE community share (55%), RDC fees (41%), CAMPFIRE Association levy (4%). Despite its achievements CAMPFIRE still faces fundamental challenges. In particular, the development strategies of households in CAMPFIRE areas focus on land uses that are incompatible with wildlife such as human immigration to rural areas, the extension of basic agricultural schemes and increased livestock numbers. Other CAMPFIRE challenges include: (i) the downturn in Zimbabwe's economy and tourism sector post-2000, (ii) great reliance on consumptive trophy hunting and less focus on other uses and non-consumptive uses of natural resources, (iii) increasing human populations averaging 16-20 people per km^2 in some key wildlife districts, and (iv) lack of re-investment in development, fixed assets, human capital, and management and protection of wildlife in CAMPFIRE areas. Despite these challenges, CAMPFIRE stands very high in the agenda of Zimbabwe's Government, and a review dedicated to improving the programme, including greater devolution of ownership of wildlife to communities, is ongoing and should be finalized by the end of 2015. Zimbabwe's Government recognizes that the survival of wild animals depends entirely on those among whom they live. Unless local people want to save them, wildlife will be poached to the point where just a few remain in fortified reserves. CAMPFIRE is meant to avoid this and the future of wildlife in communal areas rests on the success of this programme. (p. 12-13, Box 2) - 1.3.8 Human elephant conflict: As Zimbabwe's human population grows, elephant are being restricted to smaller areas and as their populations expand they increasingly move out of their designated habitat, and raid crops and sometimes threaten human lives. As a result in many rural areas where elephants exist in Zimbabwe, human-elephant conflicts are increasing, creating substantial negative attitudes to the conservation efforts of elephants. These are often among the poorest rural farmers, which makes the issue complex in social and economic terms. Unresolved conflicts stimulate poaching or retaliation. Poachers or retaliators can be seen as "local heroes" because they provide meat to the communities and resolve the conflict. A major challenge for elephant management is keeping human-elephant conflicts to a minimum. Developing a Social, Economic, and Cultural Framework has been identified as a Key Component of this Action Plan in an effort to address and reduce human-elephant conflicts. (p. 15) - Towards a Comprehensive Strategy to Reduce Human-Elephant Conflict: Some methods of reducing human-elephant conflict focus on curing the effects, not the cause. Such methods include chilli sprays,

	fences, and evening patrols to scare off marauding elephants. However, these are not necessarily long-term solutions. Long-term solutions require growing the tolerance of local communities for elephant by ensuring the communities benefit from having elephant on their lands. Tolerance is likely to increase if communities realise and appreciate economic returns earned from the sustainable use of elephant. Economic returns may be generated by consumptive and non-consumptive tourism. The devolution of decision-making on aspects of problem animal control to communities may result in better outcomes for the management of the costs and benefits of this activity. Problem animal control includes disturbing, removing, translocating, or ultimately killing those elephant that persist in damaging crops or threatening human life. Clearly, no one management option will successfully deal with all problem elephants and conflict situations. As part of this Action Plan, ZPWMA will undertake additional research on problem animal control and minimizing conflict, and will develop new solutions and a more comprehensive response to these issues. (p. 15, Box 4)
ZPWMA, Elephant Management Plan Supplement (2016)	- Table 1: Financial resources deployed up to August 2016 (p. 1) - Table 2: Other Non-Financial Resources (p. 2) - Constraints and Challenges: One of the major challenges regarding implementation of the EMP is with regards to the adoption of stricter domestic measures by the United States of America. This has had the net effect of further reducing the revenue from hunting into the Authority, which therefore affects the budget allocated to resource protection, in particular the elephant in this case. One of the key impediments towards the full and comprehensive implementation of the Elephant Management Plan is the limited resources. However, Zimbabwe is at an advanced stage in the development of resource mobilisation strategies. These strategies include partnering with both local and international institutions in resourcing and financing aspects of the programme. (p. 2-3)
ZPWMA, Non-Detriment Finding (2014)	- In Zimbabwe a foreign hunter buys a bag which may or may not include an elephant. If an elephant is included, the amount paid increases. The amount declines depending on key species in the bag such as leopard and buffalo. A foreign hunter pays to the operator who then pays to the Authority relevant trophy fees where applicable. A hunting permit is only issued to the hunting operator or a private land holder or to communities with Appropriate Authority Status. The foreign hunter only pays for the daily rates and trophy fees to the particular operator they will be hunting with. Both the daily rates and trophy fees vary with the area being hunted, type of animals in the hunting package and the target market of the operator. The daily rate is paid for services received in camp which include accommodation, food and beverages, professional hunter services etc. The hunter also pays government

	levies which are 2% Zimbabwe Tourism Authority levy on daily rate and 4% on trophy fees … The Zimbabwe Parks and Wildlife Management Authority, which is the Government's Agency responsible for managing all wildlife in the country ploughs back all the money into managing conservation and protection of the Parks Estate, which includes the range areas for elephants. (p. 37) - Communities are provided for through the Communal Areas Management Programme for Indigenous Resources of Flora and Fauna. Some of the revenue that accrues to Rural District Councils under this program is ploughed back into wildlife conservation activities in CAMPFIRE areas. Proceeds are used directly for elephant conservation, provision of game water supplies, wildlife monitoring and anti-poaching programs on communal land as well as community development programmes in the form of schools, clinics, roads and other infrastructural development projects. (p. 37) - The centralised command and control approach to law enforcement to protect the elephant is unlikely to work as proved in most parts of Africa. The long-term solution is to ensure greater return of elephants to the community. Conservation of elephants will be achieved as a by-product of the quest for sustainability. (p. 37) - Resources Available For Law Enforcement and Fire Management: A total of 1,346 of the 1,437 recruited rangers were available for deployment against a field ranger establishment of 2,200. The current ranger complement is able to cover 29,120 km^2 giving a variance of 33, 110 km^2 from the total Parks area of 62, 230 km^2. As at 31 December 2013, the Authority had a total of 103 vehicles for field law-enforcement duties and only 69 vehicles were operational. Ideally the Authority should have 150 vehicles dedicated for law enforcement duties. Thirteen (13) of the vehicles were received from donors. The Authority also bought 7 vehicles and 2 boats. 38 radios and 3 repeater links were also procured. Due to financial constraints, the Authority is not able to procure all of its transport (vehicle and fuel) requirements including field equipment and patrol kits. The rangers for field patrols are also not adequate. Table 11 below shows the ranger staffing levels, vehicles and boats status in the Authority in 2013. (p. 39) - Table 11: Status of Rangers, Vehicles and Boats in 2013 (p. 39)
ZPWMA, Legal Trade, Conservation and Rural Livelihoods: A Zimbabwean Perspective	- Zimbabwe's Protected Area Management Funding (table) (p. 10) - As shown in the Table above, CAMPFIRE income is often understated as it is largely recorded based on income receipts from safari hunting only. Economic multipliers like taxidermy, travel, extended tourism activities, food and others, are not captured as part of CAMPFIRE income. The proportion of safari operating expenses paid locally in the form of wages and salaries, and purchase of materials is also not recorded. Income from tourism ventures under CAMPFIRE is also mostly unrecorded, as a result of low investment and returns due to the current downturn in tourism receipts for the country. (p. 17)

	- American clients generally constitute 76% of hunters in CAMPFIRE areas for all animals hunted each year. The suspension of ivory imports from Tanzania and Zimbabwe by the United States of America (USA) in April 2014 resulted in the cancellation of 108 out of 189 (57%) elephant hunts initially booked by US citizens in CAMPFIRE areas. As a result of the ban, CAMPFIRE income dropped to US$2,1 million in 2014, compared to US$2,3 million in 2013, as fewer American hunters conducted their safaris nevertheless in anticipation of the lifting of the ban. However, the ban continued into 2015, resulting in a massive decline of total CAMPFIRE income to US$1,6 million. (p. 19)
CAMPFIRE Association Report	- CAMPFIRE generates on average US$2 million in net income every year … mostly through the lease of sport hunting rights to commercial safari operators (p. 1) - … the CAMPFIRE program at national level still protects an area of wild land in excess of 50,000 km^2, which is roughly equivalent in extent to the Parks and Wildlife Estate (Table 1). There are over 200,000 households that actively participate in the Program in CAMPFIRE hunting areas. Revenue received by communities, though relatively small, is used to directly offset the costs of living with wildlife through employment of game scouts or resource monitors. (p. 2) - Revised CAMPFIRE Revenue Sharing Guidelines, which were incorporated into the Constitution of the CAMPFIRE Association (CA) in 2007, prescribe that at least 55% of revenues should be devolved to producer communities, no more than 26%, and 15% for management and overheads (respectively) at RDC level, and 4% as a levy to the CAMPFIRE Association. At least 10 RDCs are in compliance with the Revenue Guidelines, and in these districts CAMPFIRE revenue is paid directly into community controlled bank accounts by safari operators (Table 4). (p. 3-4) - An analysis of data presented in October 2013 … provides an estimated total of US$2,496,349 from hunting in 2012 (Table 5). Hunting contributes an average of 90% of CAMPFIRE revenue annually. (p. 4) - An assessment of 18 main CAMPFIRE districts allocated hunting quotas for 2014 shows that 106 out of 167 Bull Elephant hunts were booked by US citizens (Table 6). Elephant trophy hunting contributes more than 70% income to the CAMPFIRE program. (p. 4) - Photographic tourism contributes an estimated 1.8% of total CAMPFIRE revenue annually according to 2006 evaluation reports on CAMPFIRE (Table 7). (p. 6) - In all CAMPFIRE districts, revenue from hunting is used to support various management activities such as; fire awareness and purchase of fire-fighting equipment; opening of roads and fireguards; training of committees; look and learn tours to other CAMPFIRE districts; purchase of communication equipment; purchase of firearms for Resource Monitors; and rehabilitation of water supply systems to hunting areas. CAMPFIRE thus contributes to job creation, empowerment, and diversification of livelihoods for rural

	communities. Substantial investments are also made annually by RDCs and safari operators in problem animal control (PAC) and anti-poaching. (p. 8) - Most of the income has been invested in infrastructure which has long term benefits to local communities. Infrastructure such as clinics, schools, and grinding mills, boreholes, roads, fencing to keep out wildlife, has been set up in a number of districts (Table 10). Purchase of tractors and drought relief food by communities has also contributed to food security in many drought prone CAMPFIRE areas. Children benefit from reduced walking distances through the construction of schools in the wards. Others benefit through procurement of learning materials and payment of school fees from CAMPFIRE proceeds. Communities also benefit from meat from safari hunting operations and occasionally from problem animal control. (p. 8-9) - Table 10: Summary of CAMPFIRE Revenue Funded Projects per District (p. 9)
CAMPFIRE Income Analysis	- In 2014, … CAMPFIRE generated a total net hunting income of US$2,102,007 in 13 districts of Zimbabwe that hunt most species, including elephant. … The major hunted species is elephant, which contributed 54% (US$1,138,375.09) of the total income. (p. 1) - Table 1: Income generated by Elephants vs. Total Income; and Percentage Income (p. 2) - Figure 6: Total Hunting Income for 12 Districts: 2009-2014 (p. 5) - As shown in Figure 6, it is highly probable that the decline in hunting income for 2014 was largely caused by the suspension of trophy imports by United States of America. The suspension has a lag effect on income, and preliminary calculations of earnings for 2015 indicate a further continuing decline. The major contributor to hunting income, elephants, had a 52% off-take rate in the 13 districts (animals hunted vs the quota). Seven districts out of 13 had an elephant off-take rate below 50% as shown in Figure 6. (p. 6) - Table 2: Examples of Community Projects funded from CAMPFIRE Revenue: 2010-14 (p. 7-8)
CAMPFIRE—Role of Hunting Report	- The income generated from trophy fees in the last 6 years (2010 – 2015) is approximately US$11.4 million of which elephant trophy fees contributed 65%, while a further US$4 million has come from the sale of hides, concession fees and other sundry income. These funds have been distributed to CAMPFIRE communities in various Wards who received approximately 57% (range 39% - 77%) of the Trophy Fees … At the District level, approximately 80% of the funds are used to support the administration and management of the CAMPFIRE program, including investment on law enforcement. In contrast, 55% of revenues provided to the producer Wards are channeled towards supporting social services such schools,

	clinics and other programs that benefit the community. The cost of living with wildlife, and particularly elephants, is shown through providing data on the scale of crop damage (7,000ha over 6 years) that has a significant impact in terms of its monetary value on rural communities who face food insecurity and deep poverty (average income US$1 a day). 96 human lives were lost to wildlife attacks, with elephant accounting for more than half of those deaths. Yet despite these challenges, communities still retain a high level of tolerance for elephants, but this support is rapidly dissipating as a result of the loss of income from trophy hunting. This places almost two million hectares of wild land at risk, including the risk of increasing retaliatory killing through poisoning and illegal wildlife crime. A way forward is discussed outlining how the resumption of trophy imports can offset the challenges facing the CAMPFIRE program and through this, enhance the conservation of elephant outside of the protected areas. (p. ii)
	- In summary, CAMPFIRE protects about 50,000 km^2 (12.7%) of land in Zimbabwe (Figure 1). Benefits from wildlife and other incomes encompass:
	  - Approximately 777,000 households (25%) in Zimbabwe benefited from CAMPFIRE directly or indirectly;
	  - Approximately 25% of Zimbabwe's people are receiving incentives to conserve wildlife and prevent anti-poaching through CAMPFIRE;
	  - Between 1994 and 2012, CAMPFIRE generated US$39 million of which US$21.5 million was allocated to communities and used for resource management (22%), household benefits (26%), and community projects (52%).
	  - About 90% of CAMPFIRE revenue comes from hunting with elephant hunting contributing up to 70% of annual revenue.
	  - Based on Constitution of the CAMPFIRE Association as amended in 2007, all major RDCs use CAMPFIRE revenue sharing guidelines, and in these districts revenue is paid directly into community controlled bank accounts by safari operators using the following guideline: RDC fees (41%), CAMPFIRE Association Levy (4%), and CAMPFIRE community (55%). (p. 5)
	- The CAMPFIRE program relies almost exclusively on income from hunting. (p. 5)
	- Figure 2: Total allocation of trophy elephant (N=1087) to nine major CAMPFIRE areas over a 6-year period (p. 7)
	- A total of 1,087 elephants have been allocated on quota to nine major CAMPFIRE areas since 2010 (Figure 2). This equates to 180 elephants per year. The distribution of this quota among the nine CAMPFIRE areas is dictated by the relative density of elephants in the neighboring protected areas and those residing in the CAMPFIRE areas. Tsholotsho, for example, that borders the southern boundary of Hwange National Park, was allocated 158 elephants (or 26/year) while Hwange, Binga and Hurungwe

	CAMPFIRE Areas that do not border onto areas of high elephant densities receive approximately 10 elephants/year. (p. 7) - Figure 3: Overall utilization (%) of elephant quotas in nine major CAMPFIRE Areas over a 6-year period (p. 8) - Table 2: Origin of hunting clients visiting the major CAMPFIRE Areas :2010 – 2015. (p. 8) - Figure 4: Contribution of hunting clients to the CAMPFIRE Program (p. 9) - Figure 5: Income (US$) generated from the sale of key trophies (p. 10) - The importance of the income from elephant is clear from these data. Trophy fees from elephant account for 64% of all fees generated from the key species (approximately US$1.2 million/year). Buffalo (20%) are ranked second while leopard, hippo and crocodile contribute approximately 5% each. Noteworthy here is the low contribution of lion (approximately 2%). This low level of income generation is partly a result of the impact of the lion import suspension into the USA and Europe, decreasing quota allocations and decreasing offtake levels brought about by the recently imposed lion age hunting regulations. By comparison, the 897 American clients who hunted in CAMPFIRE Areas in the six-year period paid US$9 million in trophy fees and daily rates. Other nationalities, contributed US$8 million. (p. 10) - RDCs can generate income for other revenue streams, notably receiving a percentage of the daily rate, concession fees, bed night levies from photographic camps and from the lease/rent of equipment (Figure 6). The eight RDCs for which data are available generated approximately US$4 million from these revenue streams. Excluded here are revenues that could have been earned from the sale of ivory recovered from problem animal control (PAC) and natural deaths, and from the distribution of meat estimated at 550,000kg over the 6-year period. (p. 10) - Figure 6: Income (US$) accruing to the RDCs from related income revenue streams (p. 10) - Over the last 6 years, the income generated from trophy fees is approximately US$11 million while a further US$4 million has come from the sale of hides, concession fees and other sundry income. The agreed split of these funds is that not less than 55% of the revenues is paid as Ward dividends, not more than 35% is allocated to the RDC for wildlife management (habitat management, fire control, monitoring, hiring of game scouts, etc.), and 15% is retained by the RDC as an administrative levy. Some RDCs do not consider all these revenues as “CAMPFIRE Funds” and segregate trophy fees from the other revenues. On average, the CAMPFIRE District Wards received 42% (range 23% - 66%) of the combined Concession and Trophy Fees, but the Wards received approximately 58% (range 26% - 77%) of the Trophy Fees (Table 3). (p. 11)

	- Table 3: Summary of the benefit sharing (US$) of hunting related income between RDCs and Wards: 2010 – 2015 (p. 12) - Most RDCs employ Game Scouts to conduct routine patrols and undertake basic law enforcement activities. In most cases this is low key since the CAMPFIRE program relies on members of the community to report incidents of wildlife crime, and any other matters related to wildlife in their respective Wards and villages. (p. 14) - Although the data are incomplete, it is estimated that 7,000ha of crops were destroyed by elephant during the 6-year period under review. It is not possible to accurately place a monetary value to this because crop production varies greatly from one year to the next, and from one region to another. It is important however to take into consideration that the impact of crop destruction in the highly prone drought areas and areas of low rainfall (e.g. Beit Bridge, Binga, Tsholotsho) is more acute than in areas where crop production may be higher. To place this into perspective, the national average maize yield is estimated at 300 – 600kg/ha, and the minimum cash value is US$180/ton. The approximate value of the maize lost is therefore US$500,000 – US$1.0 million … (p. 18) - Table 8: Summary of the extent of human – wildlife conflict recorded in CAMPFIRE Wards: 2010 – 2015 (p. 18) - Table 10: Examples of Social Services funded in selected CAMPFIRE areas from Ward Revenues generated from sport hunting: 2010-15 (p. 20) - The income to CAMPFIRE from the sustainable use of elephants has been declining since 2013, with 2014 registering a significant drop following the announcement of the ban on ivory imports into America (Figure 9). Although the hunting industry responded by seeking alternative markets (e.g. Russia, Middle East), this trend continued through 2015 and unconfirmed reports suggest that the decline has continued in 2016. (p. 22) - Figure 9: Annual income (US$) and offtake of elephants in 10 CAMPFIRE Districts (p. 23) - It is difficult to show concisely how the American ban on importation of elephant ivory from Zimbabwe has contributed to the decline in CAMPFIRE revenue and how hunting has enhanced the conservation of this species, due to the nature of the hunting industry in the CAMPFIRE areas. The hunting sector is integrated across a wide range of socio-economic activities and withdrawing one segment adversely affects a range of other wildlife based activities. Several indicators are provided here to demonstrate this: - 1. The US suspension of ivory imports from Zimbabwe has had a significant impact on CAMPFIRE, and resulted in the cancellation of 108 out of 189 (57%) elephant hunts in all major districts initially

	booked by US citizens in 2014. The net impact of this was a reduction of CAMPFIRE income for all areas from US$2.2m in 2013 to US$1.7m in 2014. A similar pattern prevailed in 2015 (US$1.6m), and a further decline is anticipated in 2016 where outfitters struggled to sell elephant safaris and those that did had to heavily discount their prices. - 2. The key trophy species (elephant, buffalo, leopard, hippo, crocodile and lion) contribute approximately US$1.2 million/year to CAMPFIRE revenues. Elephant account for 64% of these fees. (p. 22) - 3. Quota utilisation of elephant prior to the ban did not exceed 60% of the CAMPFIRE quota allocation. - 4. American hunters make up 53% of the clients in CAMPFIRE areas. - 5. CAMPFIRE producer Wards receive on average 57% of all trophy revenues. - 6. The CAMPFIRE hunting industry in the 9 RDCs covered in this analysis directly supports 104 producer Wards, representing 737 villages or 85,847 households. - 7. The CAMPFIRE program employs managers, officers and game scouts at both the District and Ward level who are responsible for monitoring wildlife based land use activities in their areas and these are directly paid from safari hunting income. - 8. Both RDCs and Wards invest in a variety of equipment that benefits communities and wildlife management. The operational and maintenance costs for this equipment are drawn from safari hunting income. - 9. RDCs utilise 80% of the CAMPFIRE revenues to support administration and management of the program. 20% is invested in global social services that benefit communities at the District level. - 10. Producer Wards, representing approximately 2.6 million hectares, bear the cost of living with wildlife. Under the 6-year period under review, elephants are responsible for the destruction of approximately 7,000ha of croplands in the 9 Districts. The minimum cost of this in terms of food production is estimated at US$500,000 – US$1.0 million. - 11. Producer Wards have elected to invest 55% of their dividends from CAMPFIRE revenues in social services (schools, clinics etc.). 74% of these revenues are generated through trophy fees where elephant play a significant role. - 12. Although CAMPFIRE communities suffer most from elephant crop damage, the number of elephant destroyed as problem animals is well within acceptable limits and with few exceptions, has little or no impact on population numbers. (p. 23) - In conclusion, the CAMPFIRE program relies almost exclusively on revenues generated through hunting. These revenues cannot be replaced through alternative wildlife based activities. This places almost two million hectares of wild land at risk, including the risk of increasing retaliatory killing through poisoning

	and illegal wildlife crime. Wildlife in Communal Lands is under pressure. Removing any benefits will tip the balance and disgruntled CAMPFIRE communities will turn to pastoralism and unsustainable agricultural practices, thereby reducing wildlife habitat. The suspension of trophy imports is effectively encouraging communities to become willing tools for poaching – a forced abandonment of CAMPFIRE. (p. 23) - The presence of regulated hunting can also reduce illegal activities, and private outfitters' lease agreements are being reviewed to include anti-poaching as an obligation of the concessionaire. Trophy hunting revenues are vital to facilitating not only law enforcement activities but also general wildlife management. Alternative wildlife land use practices, e.g. eco-tourism, cannot generate sufficient revenues to cover these costs, and certainly not to justify wildlife as a land use outside of protected areas. Hunting can generate revenues under a wider range of scenarios than eco-tourism, including in remote areas lacking infra-structure, attractive scenery, or high densities of viewable wildlife. Consequently, elephant and other wildlife populations will be negatively affected through reduced conservation efforts arising from low funding and reduced goodwill from the communities. CAMPFIRE has been widely regarded as one of Africa's most successful contemporary conservation initiatives. Hunting of elephants plays an integral part in promoting CAMPFIRE as it permits the residents of communal lands to share in the benefits generated by wildlife utilization on those lands. (p. 24) - As shown above, the bulk of CAMPFIRE's revenue comes from hunting, with elephant hunting contributing more than 60% of annual revenue. The current revenue sharing guidelines require safari outfitters to pay revenue directly into community-controlled bank accounts and this has had a positive impact on community attitudes to wildlife conservation. These funds have been used by RDCs and producer Wards to promote wildlife conservation, but despite its achievements, CAMPFIRE still faces fundamental challenges. The most crucial of these challenges is developing strategies to accommodate the increasing human populations averaging 16-20 people per km^2 in some key CAMPFIRE areas. Understandably, the focus of these households is on food security requiring the extension of basic agricultural schemes and increased livestock numbers. Such land uses are incompatible with wildlife based land use … Despite these challenges, CAMPFIRE stands very high in the agenda of Zimbabwe's Government, and an evaluation dedicated to improving the program is ongoing and should be finalized by the end of 2017. Zimbabwe's Government recognizes that the survival of wild animals depends entirely on those among whom they live. Unless local people want to save them, wildlife will be poached to the point where just a few remain in fortified reserves. CAMPFIRE is meant to avoid this and the future of wildlife in communal areas rests on the success of this program. (p. 24) - The hunting of elephants, under sustainable and well-regulated conditions, has the potential to raise adequate funds to support itself and other species in CAMPFIRE areas. For these reasons, Zimbabwe

<table>
<tr><td></td><td>confirms its commitment to the sustainable use of elephant and other wildlife in its Elephant Management Plan, and recognizes the role that elephant play in the CAMPFIRE program. (p. 25)</td></tr>
<tr><td colspan="2"></td></tr>
<tr><td>SOAZ Report</td><td>
- The results of questionnaire responses from 14 safari operators indicate that for the 110 elephant on quota between them, there will be a combined financial loss of $3,364,450 to them and to Zimbabwe (Table 1). This will have a direct impact on 87 operators and Professional Hunters, 781 Staff, 245 Anti poaching personnel and approximately 108,000 people in rural communities living with elephants. (p. 3)
- Table 1. Results to show the number of dependents, elephant on quota and the loss of revenue and hunting days as a result of the US Fish & Wildlife Services suspension on import of elephant trophies for 14 Safari Operators in Zimbabwe (p. 3)
<table>
<tr><th colspan="4">Dependents</th><th rowspan="2">Number of Elephant on Quota</th><th rowspan="2">Hunting Days Lost Suspension</th><th rowspan="2">Value of Loss</th></tr>
<tr><th>Operator & PH's</th><th>Staff</th><th>Anti Poaching</th><th>Com-munity</th></tr>
<tr><td>87</td><td>781</td><td>245</td><td>108312</td><td>110</td><td>1430</td><td>US$3,364,450.00</td></tr>
</table>
- It is estimated that trophies of 160 sport hunted elephant are imported into the USA from Zimbabwe each year. If the information in Table 1 is extrapolated out for a quota of 160 elephant (I.e. multiply each figure by a factor of 1.45) then we can assume that the financial loss to Zimbabwe of the suspension will be in the region $4,878,452.50. It will have a direct impact on 126 Operators and Professional Hunters, 1132 staff, 355 anti poaching personnel and approximately 155,000 people living in rural communities. (p. 3)
- Table 2 shows that the 14 Safari Operators that responded to the questionnaire spent a combined total of $957,843.00 on anti poaching in their areas and this employs 245 people specifically for anti poaching. (p. 4)
- Table 2. The expenditure on Anti Poaching and number of Anti Poaching personnel employed by 14 Safari Operators in Zimbabwe (p. 4)
<table>
<tr><th>Anti Poaching expenditure – 2013</th><th>Anti Poaching Personnel Employed</th></tr>
<tr><td>US$957,843.00</td><td>245</td></tr>
</table>
- As in Section 3, if these figures are extrapolated out to give figures relative to the 160 sport hunted elephant imported into the USA each year from Zimbabwe, we can make the assumption that US hunters are assisting with the funding of $1,388,872.35 towards anti poaching in Zimbabwe through their safari
</td></tr>
</table>

	payments and that this is enabling the employment of 355 anti poaching personnel along with all the equipment and support required. The imposed suspension on the import of sport hunted elephant into the USA from Zimbabwe will have a significant detrimental impact on these figures and in many cases the anti poaching efforts will not be sustained. (p. 4)
FWS Press Release	- Legal, well-regulated sport hunting, as part of a sound management program, can benefit the conservation of listed species by providing incentives to local communities to conserve the species and by putting much-needed revenue back into conservation. At this time, the Service does not have conservation concerns with African elephant sport hunting in Namibia, South Africa, or Botswana; though it should be noted that Botswana is not currently open to elephant sport hunting.

Local Conservation Efforts

DOCUMENT NAME	SAMPLE OF KEY QUOTATIONS
ZPWMA Apr. 2014 Response	- The Parks and Wildlife Act Chapter 20:14 … recognises any land that is being used for wildlife conservation and designates the legal occupant of that land as Appropriate Authority. On communal lands/tribal Appropriate Authority is accorded to the Rural District Council. Appropriate Authority is the legal right to utilize and manage wildlife on the property under community jurisdiction. (p. 15-16)
ZPWMA Dec. 2014 Response	- The Parks and Wildlife Act accorded Appropriate Authority status to communal and private property areas with significant wildlife populations which confer user rights to the property owners. Appropriate Authority allows the property owners or tenants to manage and benefit from the wildlife on their land. Local communities through CAMPFIRE programs participate in quota setting workshops in which local communities get the opportunity to learn wildlife management practices from the various technocrats who will be presenting their game management practices. The local communities also get an opportunity to market their offtake to safari operators, which if they get a hunting client, proceeds, are remitted to the community thereby improving their livelihoods. This arrangement incentivizes landowners and tenants to not only tolerate wildlife, but to conserve and promote conservation and protection of wildlife. ZPWMA also provides para-military training to Rural District Council game guards, to equip them with law enforcement and anti-poaching techniques. In the communal areas, ZPWMA is working towards increasing its network of informers to assist in intelligence gathering, a vital tool in the fight against poaching. (p. 20) - ZPWMA strongly believes that local effort has played a major role in elephant conservation.

	- Safari operators in the field are cooperating with Government agencies in anti-poaching and intelligence gathering. Very often they generally provide transport and other resources to rangers. - NGOs have played a pivotal role in supporting elephant surveys, game water supply and research. - Private owned conservancies provide key habitats for elephants outside the protected area system, including law enforcement and research into elephant population dynamics. In some communal areas, land has been set aside as wildlife management areas. Many farmers with wildlife on their properties are receiving technical assistance on wildlife conservation including intensive breeding and ranching operations. (p. 25) - Fundamentally, ZimParks supports local efforts by providing a conducive legislative and policy environment which allows the private and community sectors to thrive. The granting of Appropriate Authority Status to private properties and Rural District Councils is a case in point. - In addition, we also do the following: - share anti-poaching intelligence with the stakeholders - hold joint patrols and send reinforcements when required - restocking - offer technical advisory services - collaborate in implementing the TFCA Programme - Partnerships and joint ventures (p. 26) - Mechanisms have been put in place such as tax incentives to promote and sustain efforts across Zimbabwe's elephant range. The Parks and Wildlife Act accorded Appropriate Authority status to communal and private properties areas with significant wildlife populations which confers user rights to the property owners. Appropriate Authority allows the property owners or tenants to manage and benefit from the wildlife on their land in a coordinated manner. This arrangement gives incentives to landowners and tenants to not only tolerate wildlife, but to conserve and promote conservation and protection of wildlife. The Wildlife Based Land Reform Policy and other related policies; measures have been put in place to encourage wildlife production in areas that are not suitable for agriculture… (p. 26)
ZPWMA July 2015 Response	- The communal areas benefits from wildlife through the CAMPFIRE program. This program is key in that it helps to encourage the communities to co-existence with wildlife. (p. 50)
ZPWMA, Elephant Management Plan 2015-2020	- The Role of Sport Hunting in Elephant Conservation: Elephants are a charismatic species but can also be destructive when they destroy crops, threaten livestock and even human lives. To have a future, elephants must have value. Value to the governing authorities and to the local people. The greater the

	value, the greater the tolerance of them is likely to be. The local people who live closest to them will determine the long-term survival of species like elephant. Regulated sport hunting converts wildlife into assets for the benefit of local people and the country as a whole. Wildlife can be a most valuable asset and in turn empower local communities and provide basic necessities. When it is viewed as a valuable asset, wildlife becomes an economically competitive land use in Zimbabwe, which leads to habitat preservation instead of habitat destruction and conversion to agriculture or livestock production. Game animals have a survival advantage because of user-pay stewardship systems where use revenue generated from tourist hunters is paid through to wildlife authorities and local communities. The presence of regulated hunting can also reduce illegal activities. Many hunting operators in Zimbabwe have specialised anti-poaching units. Private operators' lease agreements are being reviewed to include anti-poaching as an obligation of the concessionaire. Regulated hunting is the opposite of poaching. One is a lawful activity designed by government wildlife authorities and experts to perpetuate resources and the other is prohibited thievery outside of and away from the system. The first is like making a bank deposit and the second is like a bank robbery, without sustainable limits. Trophy hunting revenues are vital because there are not enough tourists to otherwise generate income to support all protected areas. Eco-tourism revenues are typically sufficient to cover the costs of only some of the parks and certainly not to justify wildlife as a land use outside of protected areas. Hunting is able to generate revenues under a wider range of scenarios than eco-tourism, including in remote areas lacking infra-structure, attractive scenery, or high densities of viewable wildlife. Consequently, elephant and other wildlife populations will be negatively affected through reduced conservation efforts arising from low funding and reduced goodwill from the communities, when in reality the elephant has the economic potential to raise adequate funds to support itself and other species. For these reasons, Zimbabwe confirms its commitment to the sustainable use of elephant and other wildlife in this Action Plan. (p. 12, Box 1) - v) Private sector: The corporate community participates in elephant management mainly through resource mobilization. Safari operators report poaching and assist in anti-poaching patrols. Through lease and trophy fees they provide revenue to ZPWMA. They help develop infrastructure, provide funds to communities and supplement diets with meat from trophy animals. Zimbabwe subscribes to the principle of sustainable utilisation of wildlife resources including elephants. Sport hunting is the principal form of wildlife utilisation whereby offtakes are adaptively managed and monitored through a participatory and science based process. This process allows for sustainable offtakes, and rigorous resource monitoring programmes that allow recruitment within a population to ensure the continued survival of the population in the wild. The high economic value conferred to the elephant through consumptive utilisation has also resulted in increased tolerance by local communities. (p. 12)

ZPWMA, Non-Detriment Finding (2014)	- The centralised command and control approach to law enforcement to protect the elephant is unlikely to work as proved in most parts of Africa. The long-term solution is to ensure greater return of elephants to the community. Conservation of elephants will be achieved as a by-product of the quest for sustainability. (p. 37)
SOAZ Report	- We have received information from fourteen safari operators in Zimbabwe. The operations of these companies cover a wide range of safari concessions including Government Safaris Areas, Campfire Areas and Private Conservancies. They also include safari concessions in the three main wildlife systems in Zimbabwe being; (1) Zambezi Valley and Sebungwe, (2) the North West including Hwange/Matetsi/Vic Falls and (3) the South & South East Lowveld including Gonarezhou, Save Valley Conservancy & Bubye Conservancy. (p. 1) - The results of questionnaire responses from 14 safari operators indicate that for the 110 elephant on quota between them, there will be a combined financial loss of $3,364,450 to them and to Zimbabwe (Table 1). This will have a direct impact on 87 operators and Professional Hunters, 781 Staff, 245 Anti poaching personnel and approximately 108,000 people in rural communities living with elephants. (p. 3) - While National Parks provide the primary refuge for elephant populations in Zimbabwe, a significant proportion of elephant live in the safari areas which are generally more marginal in terms of wildlife numbers and often have large rural human populations within or adjacent to them. The role of safari operations in providing a benefit to such communities and enforcing anti poaching as a means of maintaining elephant and other wildlife populations in these areas cannot be underestimated. (p. 4)
FWS Press Release	- In Zimbabwe, available data, though limited, indicate a significant decline in the elephant population. Anecdotal evidence, such as the widely publicized poisoning last year of 300 elephants in Hwange National Park, suggests that Zimbabwe's elephants are also under siege. - Legal, well-regulated sport hunting, as part of a sound management program, can benefit the conservation of listed species by providing incentives to local communities to conserve the species and by putting much-needed revenue back into conservation. At this time, the Service does not have conservation concerns with African elephant sport hunting in Namibia, South Africa, or Botswana; though it should be noted that Botswana is not currently open to elephant sport hunting.