

**Comments on the
Draft National Elephant Heritage Strategy In South Africa**

**Prepared by the
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In a letter dated 27 January 2025, the DFFE Minister wrote:

The draft Strategy provides a high-level vision and strategic objectives at national level for the management and long-term conservation of elephants as a meta-population in South Africa, while contributing to the well-being of people. The draft Strategy provides a strategic framework for planning and decision-making around living landscapes with elephants. As such, this draft Strategy should guide development, revision and implementation of mechanisms and tools, such as the Elephant Norms and Standards, the National Elephant Research Strategy, the Non-Detrimental Finding for Elephants, the Elephant Red-list Assessment, reserve-level Elephant Management Plans, National Elephant Meta-Population Plan, and engagements regarding elephants in relevant consultative fora.

Members of the public are invited to submit written comment...

In response to this invitation, the African Wildlife Economy Institute (AWEI) at Stellenbosch University offers comments for consideration.

Our overall comment is that we are confused about the species focus of this draft strategy. Surely, much of what is being proposed should apply more broadly with species-level considerations integrated within conservation management plans. Further, developing heritage strategies such as this for the many other wild species of value to South Africans from aloe ferox to mopane worms to springbok would be unwieldy. Hence, we are not convinced there is a case for such a single species strategy.

Further comments on the draft are provided in the following table. Please note that the page number refers to the PDF page number.

Draft Elephant Heritage Strategy	AWEI comments
P7 African elephants... have intrinsic value.	The concept of intrinsic value underpins deontological arguments for animal rights held by some people, It would be more accurate and inclusive to say that 'some people believe that elephants have intrinsic value.'

Draft Elephant Heritage Strategy	AWEI comments
<p>P7 Because of the different ways that elephants are important to have meaning for, and impact on people..."</p>	<p>This statement can be made for wild species of fauna and flora in general. It is unclear why there needs to be a strategy for a single wild species.</p>
<p>P7 Status is here interpreted as...</p>	<p>Status seems to be defined as:</p> <ul style="list-style-type: none"> • conservation status, • biological aspects of elephant persistence, and • factors that threaten that <p>This is not terribly clear.</p>
<p>P7 Because elephants are part of South Africa's history, traditions and culture, heritage better encapsulates elephants' contribution to how South Africans perceive themselves....</p>	<p>'Heritage better encapsulates' than what? This phrase is unclear.</p>
<p>P7 The primary threats to the conservation of the species remain habitat destruction and illegal killing of individuals for their ivory.</p>	<p>The CITES African Elephant Action Plan highlights the following primary threats:</p> <ul style="list-style-type: none"> • illegal international and domestic trade in ivory • human elephant conflict • habitat loss and fragmentation • illegal killing for ivory and meat • lack of institutional and enforcement capacity • local overabundance <p>The Strategy should consider all of these.</p>
<p>P8 ivory is deemed to be included in Appendix I, for which international commercial trade is currently prohibited.</p>	<p>Trade in Appendix I specimens is not prohibited but rather is subject to securing both export and import permits.</p>
<p>P8 Because of its value and importance for people and the environment, and its dependence on conservation management, including protection against poaching, to survive, the African elephant warrants special attention as a species.</p>	<p>The same could be said for many other wild species. The implication is then that each species will have its own strategy. Is this intended direction of travel?</p>

Draft Elephant Heritage Strategy	AWEI comments
<p>P9 Healthy elephant populations help realise biodiversity, strengthen cultural and spiritual connections, and provide fair and inclusive opportunities for sustainable ways of living, and dignified lives, for current and future generations.</p>	<p>What is meant by 'realise biodiversity'? Also, are 'sustainable ways of living and dignified lives' referring to elephants or people?</p>
<p>P10 persistent elephant-based biodiversity</p>	<p>What does this mean?</p>
<p>P11 The three key goals of the National Elephant Heritage Strategy are: Goal 1: Conservation of living landscapes... Goal 2: Inclusive living landscapes... Goal 3: Living landscapes with elephants...</p>	<p>With the emphasis on landscapes in the goals, perhaps the document should be called the Natural Elephant Habitat Strategy.</p>
<p>P12 This strategy intends to achieve, amongst others, the outcomes of...</p>	<p>Several of the intended outcomes go far beyond management of elephants and elephant habitat such as:</p> <ul style="list-style-type: none"> • '3. Financial support and incentives are harnessed and leveraged from all sources to ensure the biodiversity sector is adequately resourced and transformed. • 4. Improved livelihoods and well-being of local communities, through meaningful participation and increased and more inclusive access and fair benefit sharing. • 6. Improved governance, co-management and partnerships, and contribution to the biodiversity economy...' <p>These intended outcomes make more sense in an overall wildlife/biodiversity strategy than in a strategy for a single species.</p>

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<p>P12 this strategy should guide the development, revision and implementation of strategies, frameworks, mechanisms, and tools, such as... the Non-Detrimental Finding for Elephants, the Elephant Red-list Assessment...</p>	<p>Regarding non-detriment findings, this is an input from the country's Scientific Authority to its Management Authority regarding issuing an export permit for a CITES listed species. Guidance from this proposed strategy is unclear.</p> <p>Likewise for the Red List assessment which is for a species in general and undertaken by the IUCN Species Survival Commission.</p>
<p>p24 When connections are constrained, interventions such as responsible translocations mimic elephant movement and dispersal dynamics.</p>	<p>This refers to only one of the 4 processes that determine population dynamics. These are births, deaths, immigration, and emigration. Translocations mimic emigration and immigration. The strategy explicitly cites the cultural value of elephant meat and other products from elephants that would require elephants to be culled. To be consistent, the strategy needs to include the option of managing deaths through culling to mimic the population dynamic process that in turn fulfils the needs of elephant products for cultural purposes. This need is unlikely to be fulfilled by natural deaths.</p>
<p>P28 Elephants have intrinsic and existence value...</p>	<p>It would be more accurate to say that for some people elephants have intrinsic and existence value.</p>
<p>P29 Expand connected space for elephants and reduce human influences (including illegal harvesting, trafficking, habitat fragmentation and human wildlife conflict), for thriving living landscapes with elephants.</p>	<p>Humans are the one species capable of managing elephants. Hence, to maintain or expand connected spaces and manage populations, in some areas human influences may need to be maintained or even increased.</p>
<p>P29 Management of elephants is evidence-based and follows a National Elephant Metapopulation Framework.</p>	<p>Include an explanation for this Framework and a rationale for following it.</p>

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<p>P30 This imposes a duty of care by South Africans to elephants.</p>	<p>The strategy also needs to be explicit about the duty of care to the landowners and communities who live with and manage these elephants.</p>
<p>P31 Adjacent communities should enjoy, and have access to, numerous traditional benefits provided by elephants and their environment.</p>	<p>First, communities need not be ‘adjacent’ but rather some can be living in landscapes shared with elephants and other wild species. Second, the benefits need not only be traditional but can also be commercial through utilisation and trade leading to enhanced livelihoods.</p>
<p>P31 Healthy elephant populations incur costs for South Africa and its people, while providing local and global intergenerational benefits.</p>	<p>Consider reframing this statement to make clear that costs are mostly incurred by owners and dwellers in lands with elephant populations and that they can cover these costs by generating marketable benefits to others – locally, nationally, and internationally -- from the use of elephants.</p> <p>This should be linked to Global Biodiversity Framework Target (GBF) 9.</p>
<p>P33 stakeholders living close to or amongst elephants often face negative consequences from elephants, carrying the burden of elephant management responsibilities.</p>	<p>With direct reference to GBF Targets 5 and 9, these stakeholders also have the potential to face the greatest returns from the management, harvesting, use, and trade of elephants products.</p>
<p>P33 protection of biodiversity on land (SDG 15)</p>	<p>This goal is about much more than protection, and this should be made clear in the strategy. SDG 15 aims to “Protect, restore, and <i>promote sustainable use of terrestrial ecosystems...</i></p>

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<p>P33 Economic benefits, services and values associated with elephants include eco-tourism, community development, hunting, tax beneficiation, conservation, carbon credits and accreditation amongst many others, including social values.</p>	<p>Be clear on what benefits can come directly from elephant management and use such as tourism and hunting, meat and hides, and bones and ivory vis-à-vis how these can be used for community developments, livelihoods, etc.</p>
<p>P34 Socio-economic opportunities from elephants, their derivatives and their environment can only be optimised if there is fair access to these... Where possible, access to elephants, in general, needs to be improved...</p>	<p>The idea of 'fair access' for a specific animal is problematic. We doubt this could be operational for domesticated species like cattle and chickens. Generally, the rancher or the farmer will maintain access to his/her animals. Likewise for wild species. Further, application of this idea to all wild plant and animal species would be unwieldy. Hence, usually access should be managed by the landowners where the elephants live.</p>
<p>P34 Derivatives from elephants such as elephant art, curios, hair, leather, ivory, and meat, and elephant-based educational programs, cultural activities, etc., have the potential to promote small business opportunities, skill development, and local value-adding.</p>	<p>Importantly there is also significant regional and international export potential for elephant goods alongside other goods derived from wild species. This could be highlighted in the strategy with current and historical examples.</p>
<p>P34 Humans and elephants use similar components of biodiversity</p>	<p>Human use is much broader. Elephants are herbivores, while humans are omnivores and eat animals including elephants.</p>
<p>P45 The intention of this strategy is that it provides a strategic framework for planning and decision-making around living landscapes with elephants.</p>	<p>It would appear that the owners of any landscape with elephants – be they public, private, or communal – would be subject to a complex multi-stakeholder, multi-agency planning and decision-making process. This might incentivise some landowners to remove elephants from their lands.</p>