Submission to the Department of Environment, 1st National Rhino Conservation Dialogue

Concerns Over the potential Trade in Rhino Horn

I have a few main concerns over the trade in rhino horn.

- 1. The concept of a Central Selling Organisation (CSO) is flawed if it does not have the ability to control the sale of the product to the end user. This is especially prevalent if the CSO is to be based in Africa, yet the sale of the rhino horn is to take place in Asia. We have seen, time and again, the lack of capacity of a number of end-user countries to police and control the sale of products of this nature as noted in ivory sales. The result will be the purchase of legal horn, yet the continued sale of it at current black market rates. It will still be lucrative to buy and trade in illegal horn, as it is now. By developing a legal market we would be allowing for fraudulent sales and trade routes to develop.
- 2. The CSO would need to sell the horn at a price below that which it is feasible and lucrative enough to poach, yet not high enough to scare buyers and speculators off. Given current conditions and the low cost of poaching, this balance would be very difficult to find. If traded at too low a price it would ultimately result in an increase in the market for horn, one in which many protrade lobbyists agree we need to be careful of, as this is a real long-term risk to this 'solution'. Traded at too high and all we do is make it feasible to still poach and open a fraudulent sales and trade routes to develop.
- 3. Currently it is illegal in China and Vietnam to import and use rhino horn, yet we are asking to obtain permission to engage with citizens of their country to buy rhino horn. Are we now expecting these countries to change their laws, to fit in line with our new policies? Surely it would be easier to engage with Asian politicians to enforce stricter measures to police the influx of rhino horn into their country and engage with other countries which could apply pressure to Asian governments to 'tow the line'.
- 4. If we, as South Africans, cannot show that we can control the current illegal movement of horn out of the country, how could we possibly believe that we could control a legal trade of the same product, yet now with the added complication of introducing a legal trade.