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Home > Commission on Environmental, Economic and Social Policy > Our work > Newsletters - SULiNews > SULiNews 11 - August 2017

Commission on Environmental, Economic and Social Policy

Giraffes: a tall and disturbing tale

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Many conservationists were shocked earlier this year to read a headline in a UK national daily newspaper suggesting that giraffes were suffering rapid decline. The newspaper was *The Guardian* and the headline read "Giraffes must be listed as endangered, conservationists tell US". The article went on to say that since 1985 there had been a drop of almost 40% in population numbers – to an estimated 97,500 and that in December 2016 IUCN had classified giraffes as vulnerable in the Red List.



What prompted *The Guardian* story was a petition from five US-based groups to have the species listed under the US Endangered Species Act. This process, if successful, can have substantial consequences both for the species affected and the livelihoods of the people who are connected with them.

It is worth examining these two threads separately before considering how they come together and the wider significance of petitions of this type.

Let us take first the population status of the species, noting that for people generally and perhaps especially for children around the world the giraffe's unique stature and colour pattern have made it a symbol of exotic African wildlife for hundreds of years. To think that it might be on the way to disappearing from the wild was truly disturbing, not least since the idea had come as a surprise and notwithstanding an awareness that some sub-species only existed in fairly small numbers.

The place to go to check this out was, naturally, the IUCN Red List.

In the case of the giraffe there is an excellent rounded presentation of trends, distribution and threat factors which puts the "approximately 40% decline" into perspective. This owes much to the Giraffe and Okapi Specialist Group of the SSC. On the present IUCN view there is one species (*Giraffa camelopardilis*) and nine subspecies, some of which are geographically separated. Occurring in 21 countries giraffes are widespread across east and southern Africa, with small populations in west and central. Four of the subspecies are estimated to be declining, four increasing and one stable. Looking at the situation regionally the large losses have occurred in East Africa (up to 86,000 lost since 1985), while Southern Africa, now home to more than 50% of the world's population in the wild, has seen large gains (plus 28,000).

Where declines have taken place the Red List assessment indicates four principal factors: habitat loss, civil unrest, poaching and ecological issues. This supports the summary statement: "Some Giraffe populations are stable or increasing, while others are declining, and each population is subject to pressure by threats specific to their local country or region."

Another way of gaining perspective is to consider what has been happening to other mammal populations in sub-Saharan Africa during recent decades, for example those of antelopes. The fundamental factor is the growth of human and livestock numbers in direct competition with grazing wildlife for space and vegetation. In the forseeable future there is no prospect that these wildlife populations can return to the levels they enjoyed a hundred or more years ago when human numbers were so much lower. Against this background a net decline of 40% over 30 years, if evenly distributed, might be a relative success.

Regrettably the Red List assessment does not concern itself with what may have enabled giraffe population increases in Southern African countries, but it is unlikely to be accidental. Chris Brown's article elsewhere in this edition of SULiNews offers evidence of success from integrated policies in Namibia.

The fundamental aspect of the ESA is that because it regulates or prohibits what can be imported into the USA by traders or recreational hunters it has an extra-territorial impact on the management and well being of people and wildlife in the range states where the species lives.

According to a US expert who has been involved in the processes of the Act the US Fish and Wildlife Service (USFWS) is not permitted to consider the possible negative effects of the listing when making the determination that the species status warrants review and listing. The listing is more a status review than recovery and management considerations. In fact, consideration of local economic impacts of the listing is prohibited. The policy adopted by Congress is that the survival of the species comes first, before human economic concerns. In the Polar Bear listing among others the USFWS ruled that the disruption of the local economic incentives and conservation revenue for management could not be taken into consideration because it was not one of the "listing criteria".

The first stage of the listing procedure does not include public comment. Within 90 days of receiving the petition the USFWS Branch for Foreign Species is to determine if the status of the species warrants a review. If it does warrant a review, that is noticed in the Federal Register setting out why and calling for comments from all interests. However "substantive" comments are controlling because the decision must be based on the best-available scientific and commercial information. That is when and where IUCN specialist groups can file expert substantive comments on the giraffe's status under the five listing criteria. After the USFWS has made that "12-month determination" (which takes one to three years) it declines to propose the listing or proposes the listing and calls for comments again for the second and final time. Again, the expert, substantive comments are controlling.

The paradox of the current situation, where the petition for listing is directed against legal hunting, presumably across all giraffe range states, is that such hunting is now permitted and only occurs on modest scale in the three countries where giraffe populations are increasing. It is an understatement to suggest that the move appears to be counterintuitive. There is no room here to speculate about the motivations of those responsible.

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