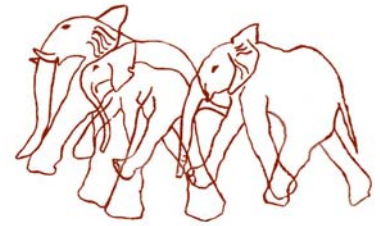


**Amboseli Trust for Elephants and ElephantVoices**  
Research Director Joyce Poole  
Buskhellenga 3, 3236 Sandefjord, Norway  
P.O. Box 15135 Nairobi, Kenya  
Telephone: (+47) 33 47 88 17 \* Mobile: (+47) 45 66 45 64  
Mail: [jpoole@elephantvoices.org](mailto:jpoole@elephantvoices.org)  
Web: [www.elephanttrust.org](http://www.elephanttrust.org) \* [www.ElephantVoices.org](http://www.ElephantVoices.org)



---

**AMBOSELI TRUST  
FOR ELEPHANTS**

---

**Marthinus van Schalkwyk,  
Minister of Environmental Affairs and Tourism  
South Africa**

**Dear Sir,**

**Re: Draft of the National Norms and Standards for the management of elephants in South Africa**

Allow me to start by apologizing for the lateness of my submission. I have had an extremely busy traveling schedule over the last two months. I do hope that you will be able to consider my comments.

My name is Joyce Poole. I am Research Director of the Amboseli Trust for Elephants and Director of ElephantVoices; I have studied elephants for over thirty years. I received a Ph.D. in Zoology from the University of Cambridge in 1982. My Ph.D. thesis was the first to describe musth and male-male competition in African elephants. I undertook postdoctoral research at Princeton University studying the communication of elephants at Amboseli National Park in Kenya. My work documented the use of infrasound in African elephants and the ability of elephants to imitate sounds. I continue to study elephant communication today. I have also documented the impact of ivory poaching on the age structure and social and reproductive patterns of several east African elephant populations. As Research Director of the Amboseli Trust for Elephants I have been joint investigator on numerous studies of elephant development, growth, cognition, genetics, sociality, leadership, post-traumatic stress disorder, to name a few. Some of my publications are listed on Appendix I. The research carried out in Amboseli represents the most comprehensive compilation of data on wild elephants and is relied on the world over for establishing basic to complex facets of elephants and their lives.

As head of the Elephant Programme at the Kenya Wildlife Service between 1990 and 1994, I was responsible for the conservation and management of Kenya's elephant population. I am, therefore, familiar with the complexities of managing and protecting wild elephants. In the last decade and a half I

have been engaged in the welfare issues affecting the lives of elephants both in the wild and in captivity and have published numerous articles and statements on the subject. I was a witness for the elephants in the Tuli Case in 1998. Most recently, together with colleagues of the Amboseli Trust for Elephants, I advised the Government of South Africa against the capture of wild calves for use in the elephant-backed safari business. In this letter I focus on issues related to elephants held captive.

It is with this background that I write to comment on aspects of the recent Draft of the National Norms and Standards for the management of elephants in South Africa.

1. While I applaud the prevention of the capture of wild elephants for captivity, there is a loophole in the clause that allows for the capture of “genuine” orphans to be taken into captivity and training. The document states that one condition for allowing the capture of a “genuine” orphan is that it has been “rejected by the elephant population of which it forms a part”. I believe that this section is open to abuse. If one goes to the effort to locate a calf’s natal family, rejections is highly unlikely. But locating the family can be difficult, and anyone interested in owning a captive elephant would make little attempt to find it. Captivity for an elephant ultimately means some form of commercial and/or abusive exploitation in the form of training for, and a life in, the elephant back safaris business, a circus or a zoo. It is, therefore, my opinion that the Norms and Standards should either 1) leave orphaned calves in the wild and allow nature to take its course or 2) set up an orphanage for elephant calves (along the lines of the David Sheldrick Memorial Trust) with the eventual aim of returning them to the wild.

The document furthermore allows for the importation of captive elephants from other countries. This clause, too, leaves elephants open to abuse. The origin of elephants is unimportant; no elephants should be taken from the wild for commercial or entertainment purposes.

My belief is that both of these clauses have been included because some individuals would like to continue to hold elephants captive for use in the elephant back safari business or for other commercial purposes. While the use of captive elephants may seem a lucrative business at present, it may not be once tourists wake up to some of the horrors behind the trade. Whether they do or not, the Norms and Standards are a valiant attempt by the Government of South Africa to be thoughtful and progressive. The holding and training of elephants in captivity for commercial exploitation or for entertainment is undesirable and should be rejected. The document should be rectified to prevent any capture of elephants from the wild for permanent captivity and/or use as working animals. Orphan and injured elephants should only be allowed into captivity temporarily and a time limit on this should be specified.

2. In the definitions, a captive elephant is defined as, “an elephant living in a captive environment”. Yet, under item 5 a) ii), it states that no person may keep an elephant unless it is a captive elephant. This seems circular. I suggest inserting the word “already” so that it reads, “no person may keep an elephant unless it is already captive.”
3. The definition of “captive environment” is inadequate. Currently it is defined in part as having an area less than 2000 ha. Since unscrupulous operators could tame, train and work elephants on land >2000ha, the definition of a “captive environment” must include situations where an elephant is being trained, chained, controlled by a handler, enclosed at night, etc. whether it is on land >2000ha or not.
4. The draft Norms and Standards allow for elephants that are already in captivity to continue to be held captive. I recently visited a newly formed Sanctuary in Thailand where working elephants are being released into the wild. Releasing captive elephants, particularly in the fenced the national parks and reserves typical in South Africa, is certainly possible and should seriously considered. Each elephant should be assessed and where possible returned to the wild or to a sanctuary situation.
5. Despite strong objection, the draft Norms and Standards still allows the training of elephants in captivity for the purposes of commercial use in circuses and elephant back safaris. The use of elephants in circuses, and the training of elephants in South Africa for the purpose of export to circuses elsewhere, should be against the law. Major lawsuits are currently being raised against the biggest circuses in the United States. Life in a circus goes against every aspect of an elephant’s interest and cannot be condoned (see attached statement by the Amboseli Trust for Elephants).
6. In my opinion the proposed Norms and Standards are likely to result in captive elephants being held without appropriate standards for their welfare being implemented and enforced. As it is now written it would allow operators to continue to train elephants as working animals for commercial purposes (e.g. circuses and elephant back safaris) despite the fact that training for these purposes necessitates having complete control over the animals. To control an animal as large as an elephant, and ensure that it behaves exactly as required, when required (unnatural behavior such as holding completely still for long periods, defecating on command, performing headstands, riding a bicycle etc), means establishing and maintaining domination. Domination in this sense can only be achieved through inhumane training and reinforcement.

7. Similarly, ensuring that an elephant carrying wealthy American tourists (capable of suing) will obey commands – even when it would prefer to engage in some other activity (like just be an elephant), also involves a long period of training using harsh and inhumane treatment, and backed up by regular threats.

Until it can be shown that using elephants in the elephant back safari business can be done: 1 without harsh training; 2 without separating individuals from their social groups; 3 without chaining and 4 without the use of bullhooks, sticks, whips and other instruments of threat and domination, then elephants should not be used in the elephant backs safari business.

8. Finally, the draft Norms and Standards do not limit the activities and uses of captive elephants. The Management Plan suggested is inadequate and does not safeguard elephant welfare. Thus, an owner of a captive elephant can, in terms of the draft Norms and Standards, use any methods of training he likes and can make an elephant work on demand. If elephants are to be allowed to be kept in captivity then detailed standards for their care and handling, and a list of permissible activities and prohibited tools (e.g. spiked ankuses, chains) should be specified (and developed in consultation with behavioural specialists).

**Joyce H. Poole, PhD.**

**Relevant publications**

In the past ten years, I authored and was the first listed author on the following publications:

- Poole, J.H. Forthcoming. The behavioral context of African elephant acoustic communication. In: *The Amboseli Elephants: A Long-Term Perspective on a Long-Lived Mammal*. Moss, C.J. & Croze, H.J. (Eds.) University of Chicago Press.
- Poole, J.H. and Granli, P.K. Forthcoming. Visual and tactile signals of elephants. In: *The Amboseli Elephants: A Long-Term Perspective on a Long-Lived Mammal*. Moss, C.J. & Croze, H.J. (Eds.) University of Chicago Press.
- Poole, J.H., P.C. Lee, & C.J. Moss. Forthcoming. Long-term reproductive patterns and musth. In: *The Amboseli Elephants: A Long-Term Perspective on a Long-Lived Mammal*. Moss, C.J. & Croze, H.J. (Eds.) University of Chicago Press.
- Poole, J.H. and Moss, C. J. In press. Elephant sociality and complexity: The scientific evidence. In: *Never Forgetting: Elephants and Ethics*. C. Wemmer & K. Christen (Eds.). Johns Hopkins University Press.
- Poole, J.H. In press. Mind and movement: Meeting the interests of elephants. In: *The Elephant in the Room*. L. Kane, D. Forthman & P. Waldau.
- Poole, J. H., I. Whyte, & P. Kahumbu. In press. Savanna elephant profile. In: *The Mammals of Africa*. Jonathon Kingdon, David Happold & Thomas Butynski (Eds.). Academic Press.
- Poole, J.H. and Granli, P.K. 2005. The ethical management of elephants and the value of long-term field research. *AAVS* 63: 2-5
- Poole, J.H., P. L. Tyack, A.. S. Stoeger-Horwath & S. Watwood. 2005. Elephants are capable of vocal learning. *Nature*, 434: 455-456.
- Poole, J. H. & P.K. Granli. 2004. The visual, tactile and acoustic signals of play in African savannah elephants. In: *Endangered Elephants, past present & future*. Jayewardene, Jayantha. (Ed.) Proceedings of the Symposium on Human Elephant Relationships and Conflicts, Sri Lanka, September 2003. Biodiversity & Elephant Conservation Trust, Colombo. Pages 44-50.
- Poole, J.H. 2000. Family reunions. In: *The Smile of the Dolphin: Remarkable Accounts of Animal Emotions*, Marc Bekoff (Ed.). Discovery Books, New York: pp. 22-23.
- Poole, J. H. 2000. When Bonds are broken. In: *The Smile of the Dolphin: Remarkable Accounts of Animal Emotions*. Marc Bekoff (Ed.). Discovery Books, New York: pp. 142-143
- Poole, J.H. 2000. *Trees of DreamCamp - Cultural uses by the Maasai*. Ecco Travel Group AS.
- Poole, J.H. 1999. Signals and Assessment in African Elephants: Evidence from playback experiments. *Animal Behaviour*, 58:185-193.
- Poole, J.H. 1998. An exploration of a commonality between ourselves and elephants. Special Issue *Etica & Animali*. 9:85-110.
- Poole, J.H. 1998. Communication and social structure of African elephants. In: *Elephants*. Care for the Wild International, UK.: pp 40-52.
- Poole, J.H. 1999. Ella's Easter Baby. *Care for the Wild Magazine*.

Poole, J.H. 1999. Voices of elephants. *Sotokoto* 8(2): 14-16.

Poole, J. & M. Reuling. 1997. A survey of elephants and other wildlife of the West Kilimanjaro Basin, Tanzania. Typescript Report. 66p.

Poole, J.H, 1997. Tuskless. *Swara* 20(3): 26.

Poole, J.H. 1997. *Elephants*. Colin Baxter Photography, Grantown-on-Spey, Scotland.

In the past ten years, I have also authored the following publications:

Archie, E.A., Hollister-Smith, J.A., Poole, J.H., Lee, P.H., Moss, C.J., Maldonado, J.E., Fleischer, R.C., Alberts, S.C. (2007) Behavioural inbreeding avoidance in wild African elephants. *Molecular Ecology*, doi:10.1111/j.1365-294X.2007.03483.x

Hollister-Smith, J.A., Poole, J.H., Archie, E.A., Vance, E.A, Georgiadis, N.J., Moss, C.J., Alberts, S.C. (2007) Age, musth and paternity success in wild male African elephants, *Loxodonta africana*. *Animal Behaviour*, 74: 287-296

O'Connell-Rodwell C.E., Wood JD, Kinzley C, Rodwell TC, Poole JH, Puria S. (2007) Wild African elephants (*Loxodonta africana*) discriminate between familiar and unfamiliar conspecific seismic alarm calls. *The Journal of the Acoustical Society of America*, 122 (2): 823-830.

I.G.A. Bradshaw, A.N. Schore, J.L. Brown, J.H. Poole & C. J. Moss. 2005. Elephant Breakdown. Social trauma: Early trauma and social disruption can affect the physiology, behaviour and culture of animals and humans over generations. *Nature*, 433: 807.

Slotow, R., G. van Dyke, J. Poole, B. Page & A. Klocke. 2000. Older bull elephants control young males. *Nature*, 408: 425-426.

Dobson, A. P. and J. H. Poole 1998. Conspecific aggregation and conservation biology. In: *Behavioral Ecology and Conservation Biology*. T. Caro (Ed.). Oxford, Oxford University Press: pp.193-208.