1   **Not just the ivory trade: corruption undermines every aspect of**

2   **elephant conservation but can be reduced**

3

4   **Introduction**

5   African elephants are in decline through illegal killing for ivory, with estimated reductions in 75% of

6   306 studied populations (Wittemyer et al. 2014). The legal trade of ivory from natural mortality and

7   problem animal control has been suggested as a way to reduce this problem, as it can provide a

8   direct and regular source of funding to elephant conservationists in Africa (Stiles 2004), people who

9   currently depend on over-stretched government budgets and grants from international donors to

10 support their work. Such international trade has not taken place since 2008 but several African

11 countries stockpile their ivory in expectation of future sales and many countries outside Africa have

12 legal domestic markets for ivory certified as antique or coming from these legal stockpiles. A recent

13 article by Bennett (2014) argues that such trade is counter-productive and should be banned

14 because: (i) current legal domestic markets have been subverted by corruption and are allowing the

15 laundering of illegal ivory, and; (ii) reducing this corruption to acceptable levels within the next few

16 decades is impossible. The impact of corruption on conservation outcomes is often ignored in the

17 literature so we welcome Bennett's article for highlighting the issue. However, singling out the ivory

18 trade gives the impression that it is uniquely affected. Here we argue that corruption potentially

19 undermines every aspect of elephant conservation and there is no evidence that any approach is

20 more or less susceptible. Thus, the long-term future of elephants requires conservationists to learn

21 lessons from other sectors to understand and tackle this problem.

22

23 **What is corruption?**

24 There is an extensive literature on the definition of corruption in which common themes are the

25 abuse of office and implication that at least two willing parties are involved (World Bank 1997).

26 Corruption can take many forms and may be more easily understood when broken down into

27 component parts, such as bribery, cronyism, embezzlement, fraud and nepotism (Vargas-Hernández

28 2013). While corruption can occur in any institution or society, it tends to thrive when there is weak

29 rule of law, abnormal concentrations of power in one individual or institution, and no counter-

30 balancing mechanisms in place (Luo 2005). This is exacerbated when there is opportunity for

31 financial gain, and risks are heightened when working in certain geographical areas. In addition,

32 there are circumstances in which organizations are particularly vulnerable to corrupt exploitation,

33 such as when they rely on discretionary powers for permits, licenses or activities. Given this

34   background, it is reasonable to assume that many conservation organizations and initiatives are

35   highly vulnerable to the effects of corruption, especially when dealing with valuable commodities.

36   Despite this, we lack any systematic studies on key issues relating to corruption in conservation

37   (Smith & Walpole 2005) and the only available evidence comes from case-studies, media reports and

38   examples from other sectors.

39

40   **How does corruption impact elephant conservation?**

41   An increasing amount of evidence on the impacts of corruption in conservation comes from

42   elephant projects, as the recent increase in poaching has made this a high profile issue, with park

43   staff, enforcement officers and politicians all being implicated (Milman 2013). Furthermore, this

44   supports studies from the academic literature showing correlations between elephant population

45   trends and corruption (Smith et al. 2003; Burn et al. 2011) and documenting the role of corruption in

46   the illegal killing of elephants for ivory (Gross 2007) and meat (Stiles 2012). Bennett (2014) adds

47   compelling evidence for corruption undermining the legal sales of ivory but others argue the

48   alternative conservation strategy she advocates, namely banning the legal trade, is similarly

49   vulnerable. This is because both legal trade and trade bans are undermined by the collusion of

50   corrupt officials in the illegal killing of elephants and the smuggling of ivory from producer to

51   consumer states (Stiles 2014).

52

53   Indeed, elephant conservation involves a range of approaches and corruption could impact them all

54   (Table 1). Bribery undermines efforts to combat illegal trade, but also impacts on enforcement of

55   anti-poaching laws (Barnes et al. 1995), sustainable hunting and effective land-use planning.

56   Cronyism and nepotism reduce staff capacity and the likelihood of crimes being reported.

57   Embezzlement reduces conservation funding levels (Thouless & Sakwa 1995), undermines positive

58   incentives for community-based conservation through trophy-hunting and ecotourism (Leader-

59   Williams et al. 2009), and leads to decision makers focusing on the wishes of donors and elites more

60   than stakeholders (Norton-Griffiths 2007). Fraud also diverts and reduces conservation funding and

61   undermines donor confidence by claiming funds for non-existent projects or colluding to avoid

62   paying concession fees (Laurance 2004).

63

64   **How can we reduce corruption?**

65   This suggests the influence of corruption on elephant conservation is far reaching and should be

66   recognized as an important problem. Such a conclusion might appear depressing but fortunately

67   there is plenty of evidence from other sectors that corruption can be reduced at the country (Alam &

68 Southworth 2012), institutional (United Nations 2009) and local project level (Landell-Mills 2013). A

69 first step is to divide up the problem into specific issues based on type of corruption and type of

70 conservation approach, e.g. embezzlement of protected area budgets. This makes the task less

71 daunting, moving away from portraying corruption as a monolithic, unsolvable problem. Many of

72 these issues can then be tackled by standard good management such as auditing accounts, adopting

73 transparent hiring practices and prosecuting alleged miscreants (Transparency International 2013).

74 More broadly, organizations benefit from developing anti-corruption policies and culture that help

75 guide staff when dealing with the problem (Transparency International 2012). Issue-specific

76 solutions are also needed so, for example, lessons for the ivory trade could be learnt from the Forest

77 Stewardship Council (FSC) certification system. There are key similarities between the trade in ivory

78 and tropical hardwood, as both come from slow-growing species, are highly valued commodities and

79 their trade involves crossing national boundaries, obtaining permits and working with officials in

80 countries with high levels of corruption (Cashore et al. 2007). Despite this, the integrity of the FSC

81 certification process is widely recognized and is supported by most international conservation non-

82 governmental organizations (NGOs), although uptake in Africa is currently low (FSC, 2014).

83

84 This shows that corruption can be reduced but shifts focus to the institutional and political will

85 needed for this change. Therefore, one approach would be to focus on aspects of elephant

86 conservation where conservation practitioners have most influence, and these tend to be those that

87 act at the local to landscape level (Table 1). Increasing effectiveness at this scale would help ensure

88 healthy elephant populations and local support for their conservation, as well as tackling the

89 problem of ivory laundering at source. Moreover, this would have broader biodiversity benefits,

90 given that recent declines in African elephants are not unique and are similar to those of lower

91 profile African mammal species that are not impacted by international trade (Craigie et al. 2010).

92

93 Just as importantly, we need action and leadership at higher political levels. Anti-corruption policies

94 have been developed and enforced in other sectors through popular campaigns at the grassroots

95 level and pressure from donors. One obvious approach would be for international conservation

96 groups to lead on tackling the problem or to engage more closely with the anti-corruption

97 community. They could follow the example of CAFOD, Tearfund and Christian Aid, development

98 NGOs that recognized that corporate bribery was a major barrier to reducing international poverty

99 and so played an active role in supporting anti-corruption legislation, such as the recent UK Bribery

100 Act. A more radical approach would be to consider corruption when developing international policy.

101 For example, the international community generally makes policy recommendations based on

102   protecting elephants in countries where they are declining most rapidly. We would argue these

103   declines are likely to continue unless corruption is tackled and so elephant range states with

104   effective anti-corruption policies should have more of a voice in international debates.

105

Conclusions

107   We are more sanguine about the future of African elephants than Bennett (2014), but without

108   tackling corruption we fear their distribution patterns will resemble those of Africa's rhinos, with

109   relatively large populations in countries with lower levels of corruption (Smith et al. 2013) and

110   smaller populations in a few high-profile protected areas in countries where corruption is more

111   prevalent. Despite this, corruption is still down-played in the conservation literature and so we

112   applaud Bennett for raising the profile of this topic and detailing the countries involved. But this

113   needs to be a beginning. We need much more research to understand the specifics of the problem

114   and to start adopting tried-and-tested techniques for reducing corruption at every level. Such action

115   could be inspired by the anti-corruption community, who are confident that corruption can be

116   tackled given recent developments that include new legislation, new political commitment and

117   greater enforcement (CMS, 2013). Indeed, it would be ironic if conservationists were to conclude

118   that corruption is too hard to tackle just at the point when the rest of the world is concluding the

119   opposite.

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178   **Table 1: An overview of elephant conservation strategies, their spatial scale and the relative role**

179   **of conservation practitioners in their implementation. Conservation practitioners are defined as**

180   **people responsible for implementing conservation policy or practice and can include government**

181   **staff, members of civil society and the private sector. Details will differ by country, region and**

182   **project type, e.g. government plays a major role when land-use planning decisions involve state**

183   **protected areas but the private sector can be more involved when planning in logging, agricultural**

184   **and tourism concessions. However, we argue there is a general trend for the relative role of these**

185   **practitioners to decrease as spatial extent increases, so site-based interventions are often those**

186   **where conservation practitioners can have the most impact.**

Elephant conservation strategy	Spatial scale	Relative role of conservation practitioner
Protected area and habitat management	Site	Major
Positive incentives through revenue generation from ecotourism	Site	Major
Positive incentives through revenue generation from trophy hunting	Site	Major
Increasing tolerance through human-elephant conflict mitigation	Site	Medium to Major
Elephant population monitoring	Site to sub-national	Major
Enforcement of anti-poaching legislation (largely by government staff)	Site to sub-national	Minor to Major
Land-use planning to maintain and restore habitat and connectivity	Landscape	Minor to Medium
Implementation of government policy on elephants and conservation	National	Minor to Major
Enforcement of trade legislation on elephant products (mainly by government agencies)	National to global	Minor

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