



HUMANE SOCIETY
INTERNATIONAL



CENTER for
BIOLOGICAL
DIVERSITY
Because life is good.



February 5, 2019

Dear Members of the IUCN Giraffe and Okapi Specialist Group,

The undersigned organizations thank you for your work on behalf of giraffes and for sounding the alarm about the on-going silent extinction of this species.

We write to urge you to support the proposal submitted by Central African Republic, Chad, Kenya, Mali, Niger and Senegal to list the giraffe (*Giraffa camelopardalis*) on Appendix II under the Convention on International Trade in Endangered Species of Wild Fauna and Flora (CITES).¹ This proposal will be considered at the 18th meeting of the Conference of the Parties (CoP18) to CITES, which will be held in Sri Lanka from 23 May – 3 June 2019.

Beyond our shared concern over declining giraffe populations, our organizations have worked on CITES matters for decades and seek to provide you with our views on why a CITES Appendix II listing is an essential component to preventing the extinction of giraffes.

Indeed, we are aware that members of the IUCN Giraffe and Okapi Specialist Group (GOSG) may be involved in reviewing this proposal as part of the IUCN/TRAFFIC analysis of species proposals to be considered at CITES CoP18. We would like to ensure that you have all the information you may find useful in conducting an informed review including, but not limited to, international trade data for giraffe.

We understand that the GOSG has not identified international trade as one of the primary threats to giraffes. However, as explained below, **international trade does not have to be a primary threat to a species for it to qualify for listing on CITES Appendix II.** Often, international trade may act synergistically with primary threats to negatively impact wildlife populations. Moreover, a **listing on Appendix II does not result in a trade ban.** Rather, Appendix II listing would result in **regulation of international trade.** Currently, most international giraffe trade is occurring without regulation for conservation purposes.

This letter explains why the giraffe meets the CITES criteria for listing on Appendix II, and what it would mean in terms of regulation of international giraffe trade if the proposal is adopted. We stand ready to answer any questions you may have.

I. About CITES

CITES is a United Nations treaty signed and ratified by 183 countries (or “Parties”).² It aims to ensure that international trade in specimens of wild animals and plants does not threaten their survival. The treaty has three Appendices:

¹ https://cites.org/sites/default/files/eng/cop/18/prop/020119_d/E-CoP18-Prop_draft-Giraffa-camelopardalis.pdf

² <https://cites.org/>

- Appendix I includes species threatened with extinction which are or may be affected by trade. Trade in specimens of these species is subject to particularly strict regulation in order not to further endanger their survival and must only be authorized in exceptional circumstances. With a few exceptions, international trade for primarily commercial purposes (such as for sale in the importing country) is not permitted for species listed on Appendix I. Species listed on Appendix I include the tiger, Asian elephant, and chimpanzee.³
- Appendix II includes:
 - species that are not necessarily currently threatened with extinction, but may become so unless trade in such species is strictly regulated; and
 - other species which must be subject to regulation in order that trade in specimens of certain species referred to in sub-paragraph (a) of this paragraph may be brought under effective control. This clause refers to species that, in their traded form, look like species included in Appendix II.

International trade for commercial purposes in Appendix II species is allowed but regulated to ensure that traded specimens are legally acquired, that trade is not detrimental to the survival of the species, and that live specimens are prepared and shipped as to minimize risk of injury, damage to health, or cruel treatment. Examples of species on Appendix II are the hippopotamus, Hamadryas baboon, and Sakar falcon.

- Appendix III includes species that any Party identifies as being subject to regulation within its jurisdiction for the purpose of preventing or restricting exploitation, and as needing the co-operation of other Parties in the control of trade. Examples of species on Appendix III are Dorcas gazelle (Algeria, Tunisia), aardwolf (Botswana), and alligator snapping turtle (US).

There are specific criteria that must be met for a species to be listed on CITES Appendix II.

Firstly, Article II, paragraph 2(a) of the CITES treaty states: “Appendix II shall include: (a) all species which although not necessarily now threatened with extinction may become so unless trade in specimens of such species is subject to strict regulation in order to avoid utilization incompatible with their survival.”⁴

Secondly, the Parties have adopted Resolution Conf. 9.24 (Rev. CoP17), on *Criteria for amendment of Appendices I and II*,⁵ that states:

- “A species should be included in Appendix II when, on the basis of available trade data and information on the status and trends of the wild population(s), at least one of the following criteria is met: ... B. It is known, or can be inferred or projected, that regulation of trade in the species is required to ensure that the harvest of specimens from the wild is not reducing the wild population to a level at which its survival might be threatened by continued harvesting or other influences.” (Annex 2a, Criterion B).
- “When considering proposals to amend Appendix I or II, the Parties shall, by virtue of the precautionary approach and in case of uncertainty either as regards the status of a species or the impact of trade on the conservation of a species, act in the best interest of the conservation of the species concerned and adopt measures that are proportionate to the anticipated risks to the species.” (Annex 4).

II. Status of the Species

As you are aware, both the 2018 and 2016 assessments of the giraffe for the IUCN Red list resulted in a Vulnerable classification due to an observed population decline of 36-40 percent over three generations (30 years, 1985-2015).⁶ Your previous assessment of the giraffe was of Least Concern (2010). However, the 2018 and 2016 assessments recognized that the population is decreasing: in 1985 it was estimated at

³ <https://cites.org/eng/app/appendices.php>

⁴ <https://cites.org/eng/disc/text.php#II>

⁵ <https://cites.org/sites/default/files/document/E-Res-09-24-R17.pdf>

⁶ <https://www.iucnredlist.org/species/9194/136266699#assessment-information> and Muller, Z. et al. 2018. *Giraffa camelopardalis* (amended version of 2016 assessment). The IUCN Red List of Threatened Species 2018: e.T9194A136266699. <http://dx.doi.org/10.2305/IUCN.UK.2016-3.RLTS.T9194A136266699.en>

151,702-163,452 (106,191-114,416 mature individuals) declining to only 97,562(68,293 mature individuals) in 2015. The 2018 assessment identifies four primary threats – habitat loss; civil unrest; illegal hunting; and ecological changes – but also recognizes “the species has been overlooked in terms of research and conservation” and recent efforts have focused upon assessing “population size and distribution.”⁷

The giraffe is currently not listed under CITES. The proposal’s proponents are concerned that the substantial international trade in giraffe parts documented in their proposal may be, or may become, harmful to giraffe populations – especially in light of the other ongoing threats to giraffes. Accordingly, their proposal to list giraffes in Appendix II seeks to regulate trade to ensure that it is not detrimental to the survival of the giraffe, and that specimens in trade are legally acquired. Requiring CITES export permits will provide essential missing data on the levels and sources of giraffe parts and derivatives in trade and help ensure that demand for bones, skins, and other parts are not further contributing to the species’ decline due to habitat loss, civil unrest, illegal hunting, and ecological change.

It should be noted that the taxonomy used in the proposal, which recognizes one species of giraffe (*Giraffa camelopardalis*), is based upon the CITES-accepted nomenclatural reference for mammals:⁸ Wilson & Reeder’s Mammal Species of the World, third edition (2005).⁹ It is also consistent with the taxonomy used in the 2018 IUCN Red List assessment.¹⁰ As noted in the proposal, the proponents are aware of the ongoing scientific discussion surrounding giraffe taxonomy; however, this debate is not a reason to withhold support for the proposal. Even if the giraffe is split into four or more species, this does not change the fact that it is difficult, if not impossible, to distinguish giraffe parts in trade to the species or subspecies level, particularly since specimens in trade include bone carvings. Consequently, the option of listing some but not all giraffe populations or subspecies (a so-called “split listing”) would undoubtedly create enforcement problems. It is for this reason that species can be listed on Appendix II if they look like other species listed on that Appendix.¹¹

Thus, whether there are one, four, or more species of giraffes, given they all look alike, especially in trade, all giraffes meet the Appendix II criteria.

As you know, the 2018 giraffe assessment recognizes nine giraffe subspecies, of which four are increasing (*G. c. angolensis*, *G. c. giraffa*, *G. c. peralta*, *G. c. rothschildi*), four are decreasing (*G. c. antiquorum*, *G. c. camelopardalis*, *G. c. reticulata*, *G. c. tippelskirchi*), and one is stable (*G. c. thornicrofti*) (see Table below). Two are classified as Critically Endangered (*G. c. antiquorum*, *G. c. camelopardalis*), one as Endangered (*G. c. reticulata*), two as Vulnerable (*G. c. thornicrofti*, *G. c. peralta*), one as Near Threatened (*G. c. rothschildi*), and one as Least Concern (*G. c. angolensis*). The remaining two subspecies were not assessed. Five of the nine subspecies have small population sizes (defined as <5000 in Resolution Conf. 9.24 (Rev. CoP17)): *G. c. antiquorum*, *G. c. camelopardalis*, *G. c. thornicrofti*, *G. c. peralta*, *G. c. rothschildi*). Three of the nine subspecies have very small population sizes (defined as <500 in Resolution Conf. 9.24 (Rev. CoP17)): *G. c. camelopardalis*, *G. c. thornicrofti*, *G. c. peralta*).

III. International Trade in Giraffe Specimens

As noted previously, international trade in giraffe parts was not recognized by the GOSG as a threat to the species, except in the case of *G. c. antiquorum* where the threat posed by transboundary giraffe

⁷ Muller, Z. et al. 2018. *Giraffa camelopardalis* (amended version of 2016 assessment). The IUCN Red List of Threatened Species 2018: e.T9194A136266699. <http://dx.doi.org/10.2305/IUCN.UK.2016-3.RLTS.T9194A136266699.en>

⁸ CITES Resolution Conf. 12.11 (Rev. CoP17), <https://cites.org/sites/default/files/document/E-Res-12-11-R17.pdf>

⁹ <https://www.departments.bucknell.edu/biology/resources/msw3/browse.asp?s=y&id=14200476>

¹⁰ Muller, Z., Bercovitch, F., Brand, R., Brown, D., Brown, M., Bolger, D., Carter, K., Deacon, F., Doherty, J.B., Fennessy, J., Fennessy, S., Hussein, A.A., Lee, D., Marais, A., Strauss, M., Tutchings, A. & Wube, T. 2018. *Giraffa camelopardalis* (amended version of 2016 assessment). The IUCN Red List of Threatened Species 2018: e.T9194A136266699. <http://dx.doi.org/10.2305/IUCN.UK.2016-3.RLTS.T9194A136266699.en>. Downloaded on 23 January 2019.

<https://www.iucnredlist.org/species/9194/136266699#population>

¹¹ CITES, art. II paragraph 2(b) (Appendix II shall include “other species which must be subject to regulation in order that trade in specimens of certain species referred to in sub-paragraph (a) of this paragraph may be brought under effective control”).

bushmeat trade within Central Africa was acknowledged.¹² Yet, in fact, there is significant international trade in giraffe body parts (see below).

From 2006-2015, the U.S. alone imported a total of 39,516 giraffe specimens (99.7 percent of which were wild-sourced).¹³ The most commonly-traded items were bone carvings (21,402), bones (4,789), trophies (3,744), skin pieces (3,008), bone pieces (1,903), skins (855), and jewelry (825)¹⁴ (See Annex, Table 1). Other giraffe specimens in trade included shoes (528), hair (501), small leather products (366), feet (339), large leather products (325), horn (ossicone) carvings (201), and smaller numbers of skulls, hair products, specimens, tails, skeletons, rugs, shell products, carapaces, trim, wood products (e.g. furniture), plates, genitalia, horns (ossicones), live animals, bodies, teeth, eggshells (e.g. ostrich egg products with giraffe hair affixed), ears, legs, and unspecified products.

As noted in the proposal, recent online trade studies found 321 giraffe products offered for sale in seven countries within the European Union.¹⁵ Furthermore, a recent investigation of giraffe trade in the U.S. found giraffe parts for sale country at more than 52 U.S. locations throughout the country.¹⁶ Western boots made from giraffe leather and specialty knives/knife products made from giraffe bone were the most commonly found giraffe products in the U.S. Other giraffe products found in the U.S. included giraffe taxidermy “trophies,” giraffe hide pillows and rugs; giraffe skin bible covers and furniture; and giraffe bones and bone carvings.

There is direct evidence of international trade in all giraffe subspecies (see Annex, Table 2).

As noted above, the Critically Endangered giraffe subspecies, *G. c. antiquorum*, is affected by international trade in giraffe bushmeat within Central Africa.¹⁷ All of the other subspecies have been documented in international trade by U.S. import data from 2006-2015. While most specimens documented originated in South Africa (31,245 specimens) or Zimbabwe (5,249 specimens), where the populations of the relevant subspecies are increasing, the data include giraffe specimens that originated in countries with Critically Endangered, Endangered, and Vulnerable subspecies, or those with declining or small populations. The number of giraffes involved in this trade is small in comparison to exports from South Africa and Zimbabwe, but for threatened species, or those with small or declining populations, the impact of even limited trade could be highly detrimental. Examples of concern include: the 692 specimens imported to the U.S. between 2006 and 2015 from Tanzania, where according to 2018 assessment, the giraffe population decreased by 52 percent since 1977-1980; and the four trophies and one skin imported to the U.S. between 2006 and 2015 from Zambia, where the giraffe population includes only 420 mature individuals.

The top exporting country, South Africa, has exported to the U.S. giraffe specimens that originated in other countries. These exports include 50 wild sourced bones of Somalia origin that were exported for commercial purposes in 2012. As you know, the giraffe subspecies that exists in Somalia, *G. c. reticulata*, is Endangered and the population has declined by 77.8 percent since the 1990s. Furthermore, 449 giraffe specimens, most exported from South Africa, had an “unknown” country of origin (see Annex, Table 3) and could have originated from threatened, declining or small populations. Your 2018 assessment of giraffes further recognizes that illegal hunting is a concern in southern Africa.¹⁸ Thus, even if giraffe populations there are stable, ensuring exported giraffe parts were legally acquired is important to curtailing the threat of illegal hunting.

The trade data in the proposal and collected herein represents only a portion of all international trade in giraffe specimens, as it represents U.S. import data and some information on the EU market. Based on our experience at CITES, it is highly likely that the U.S. comprises no more than half of the global market,

¹² <https://www.iucnredlist.org/species/88420742/88420817#threats>

¹³ https://cites.org/sites/default/files/eng/cop/18/prop/020119_d/E-CoP18-Prop_draft-Giraffa-camelopardalis.pdf

¹⁴ https://cites.org/sites/default/files/eng/cop/18/prop/020119_d/E-CoP18-Prop_draft-Giraffa-camelopardalis.pdf

¹⁵ https://cites.org/sites/default/files/eng/cop/18/prop/020119_d/E-CoP18-Prop_draft-Giraffa-camelopardalis.pdf

¹⁶ <http://www.hsi.org/assets/pdfs/giraffe-report-HSI-HSUS-082318.pdf>

¹⁷ <https://www.iucnredlist.org/species/88420742/88420817>

¹⁸ <https://www.iucnredlist.org/species/9194/136266699>

and possibly significantly less. A CITES Appendix II listing, in addition to other benefits noted above, would provide data for all giraffe trade globally, for all purposes, and from all sources. This data, submitted by CITES Parties, would be disclosed in the searchable CITES Trade Database.¹⁹ Such a database would reveal, for the first time, the true extent of the trade and possibly shed light on its impact on giraffe conservation.

We would be pleased to provide you with the raw data, in excel format, on giraffe imports that we received under a Freedom of Information Act request to the U.S. Fish and Wildlife Service.

IV. The Benefit of Listing Giraffes on Appendix II

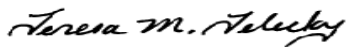
Given the vulnerable and declining status of the giraffe species as a whole, and the demonstrably large volumes of trade (including some trade from countries with threatened, declining and small populations), an Appendix II listing is necessary to ensure that the giraffe parts traded internationally are legally acquired and not detrimental to the survival of the species in the wild.

Based on the information presented above, *Giraffa camelopardalis* meets the criteria for listing on CITES Appendix II and the giraffe would benefit from such a listing. Such a listing would also help draw much needed attention to giraffes and create the possibility for synergy between CITES and CMS to benefit this species and your on-going conservation efforts.

We trust that you will find the information presented in this letter useful as you develop your recommendations on the giraffe proposal. Please do not hesitate to contact us if we can provide further information or assistance.

Finally, we thank you for your strong and unwavering commitment to giraffe conservation.

Sincerely,



Teresa M. Telecky, Ph.D.
Vice President, Wildlife
Humane Society International



Elly Pepper
Deputy Director, Wildlife Trade Initiative
Natural Resources Defense Council



Mark Jones, veterinarian
Head of Policy
Born Free Foundation



Daniela Freyer
Co-Founder
Pro Wildlife



Tanya Sanerib
International Legal Director
Center for Biological Diversity

DJ Schubert

DJ Schubert
Wildlife Biologist
Animal Welfare Institute

Jan Creamer

Jan Creamer
President, Co-Founder
Animal Defenders International

¹⁹ <https://trade.cites.org/>

Table 1. Total U.S. Giraffe Imports, 2006-2015, all sources and all purposes.²⁰

Wildlife Description	2006	2007	2008	2009	2010	2011	2012	2013	2014	2015	TOTALS
Bone Carvings	2,933	4,194	1,641	2,735	1,736	233	790	1,418	1,495	4,227	21,402
Bodies	0	0	1	1	0	0	0	1	0	0	3
Bones	167	65	487	345	77	1403	350	434	775	686	4,789
Bone Pieces	1,691	2	15	9	10	2	37	7	76	54	1,903
Carapaces	38	0	0	0	0	0	0	1	0	0	39
Ears	0	0	0	0	0	0	0	0	1	0	1
Eggshells	0	2	0	0	0	0	0	0	0	0	2
Feet	18	9	22	37	45	29	69	58	23	29	339
Genitalia	0	0	2	1	0	0	0	0	2	1	6
Hair	400	2	5	1	0	1	0	81	0	11	501
Hair Products	10	0	0	2	2	0	1	0	3	100	118
Horn Carvings	0	0	0	0	0	3	0	63	48	87	201
Horns	0	0	0	0	0	2	3	0	0	0	5
Jewelry	53	66	670	0	10	0	5	9	5	7	825
Leather Products Large	2	3	6	18	32	11	11	58	76	108	325
Leather Products Small	5	4	3	1	1	3	42	147	58	102	366
Legs	0	0	0	0	0	0	0	1	0	0	1
Live	0	0	0	0	3	0	0	1	0	0	4
Plates	0	0	0	0	0	0	0	3	2	3	8
Rug	15	6	15	5	6	0	2	8	1	5	63
Shell Product	0	0	0	0	0	0	0	0	50	0	50
Shoes	0	0	0	0	0	0	0	2	8	518	528
Skeletons	0	0	0	0	0	0	0	0	0	64	64
Skins	16	22	115	18	307	9	18	22	163	165	855
Skin Pieces	50	310	85	133	34	245	62	704	465	920	3,008
Skulls	18	2	14	12	32	29	6	6	4	27	150
Specimens	1	0	0	19	0	0	50	6	0	25	101
Tails	1	0	1	15	7	6	18	7	5	5	65
Teeth	0	0	0	0	1	0	0	0	0	2	3
Trim	0	2	3	4	0	9	0	1	0	2	21
Trophies	425	372	339	405	280	328	342	408	386	459	3,744
Unspecified	10	0	0	2	1	0	0	1	2	0	16
Wood Products	0	0	0	6	0	1	0	3	0	0	10
TOTAL	5,853	5,061	3,424	3,769	2,584	2,314	1,806	3,450	3,648	7,607	39,516

²⁰ Proposal, https://cites.org/sites/default/files/eng/cop/18/prop/020119_d/E-CoP18-Prop_draft-Giraffa-camelopardalis.pdf, p. 22.

Table 2. Giraffe subspecies, conservation status and evidence of international trade.

Subspecies	Range States	Number of mature individuals	IUCN Status	Population Trend	Evidence of International Trade
<i>G. c. antiquorum</i>	Cameroon, Central African Republic, Chad, Democratic Republic of Congo, South Sudan	1,400	CR ²¹	Decreasing	Giraffe bushmeat traded transboundary within Central Africa. ²²
<i>G. c. camelopardalis</i>	Ethiopia, South Sudan	455	CR ²³	Decreasing	U.S. imported one wild source trophy from Ethiopia in 2008; unknown if <i>G. c. camelopardalis</i> or <i>G. c. reticulata</i> . ²⁴
<i>G. c. reticulata</i>	Kenya, Somalia, Ethiopia	11,048	EN ²⁵	Decreasing	U.S. imported from Kenya three pieces of jewelry for personal purposes in 2006 and 125 bone carvings for commercial purposes in 2007, all wild source; unknown subspecies. ²⁶ U.S. imported one wild source trophy from Ethiopia in 2008; unknown if <i>G. c. camelopardalis</i> or <i>G. c. reticulata</i> . ²⁷ U.S. imported 50 wild source bones that originated in Somalia but were exported from South Africa in 2012 for commercial purposes. ²⁸ U.S. imported one tail and one hair item in 2009 that originated in Somalia but were exported from Italy for personal purposes. ²⁹
<i>G. c. tippelskirchi</i>	Kenya, Tanzania	31,611	Not assessed	Decreasing	U.S. imported 692 specimens from Tanzania, 2006-2015. ³⁰ This included 670 wild source jewelry items for commercial purposes (2008) exported from Tanzania and wild source for personal purposes: 1 hair item (2006) and 20 jewelry pieces (2007) both exported from Tanzania, and 1 bone piece (2006) exported from Zimbabwe. ³¹ U.S. imported from Kenya three pieces of jewelry for personal purposes in 2006 and 125 bone carvings for commercial purposes in 2007, all wild source; unknown subspecies. ³²

²¹ <https://www.iucnredlist.org/species/88420742/88420817>

²² <https://www.iucnredlist.org/species/88420742/88420817#threats>

²³ <https://www.iucnredlist.org/species/88420707/88420710>

²⁴ U.S. Fish and Wildlife Service import data. See Annex, Table 3.

²⁵ <https://www.iucnredlist.org/species/88420717/88420720>

²⁶ U.S. Fish and Wildlife Service import data. See Annex, Table 3.

²⁷ U.S. Fish and Wildlife Service import data. See Annex, Table 3.

²⁸ U.S. Fish and Wildlife Service import data. See Annex, Table 3.

²⁹ U.S. Fish and Wildlife Service import data. See Annex, Table 3.

³⁰ https://cites.org/sites/default/files/eng/cop/18/prop/020119_d/E-CoP18-Prop_draft-Giraffa-camelopardalis.pdf

³¹ U.S. Fish and Wildlife Service import data. See Annex, Table 3.

³² U.S. Fish and Wildlife Service import data. See Annex, Table 3.

Subspecies	Range States	Number of mature individuals	IUCN Status	Population Trend	Evidence of International Trade
<i>G. c. thornicrofti</i>	Zambia	420	VU ³³	Stable	U.S. imported from Zambia four wild source trophies (in 2006, 2008, and 2011) for hunting purposes, and one wild source skin in 2008 for hunting purposes.
<i>G. c. angolensis</i>	Namibia, Botswana	10,173	LC ³⁴	Increasing	U.S. imported 685 specimens from Namibia, 2006-2015. ³⁵
<i>G. c. giraffa</i>	Zimbabwe, Mozambique, South Africa, Botswana	21,387	Not assessed	Increasing	U.S. imported 31,245 specimens from South Africa and 5,249 specimens from Zimbabwe, 2006-2015. ³⁶
<i>G. c. peralta</i>	Niger	425	VU ³⁷	Increasing	U.S. imported one wild-sourced skin for personal purposes in 2009 from Nigeria; the giraffe is extinct in Nigeria but this could have been <i>G. c. peralta</i> .
<i>G. c. rothschildi</i>	Uganda, Kenya	1,399	NT ³⁸	Increasing	U.S. imported from Kenya three pieces of jewelry for personal purposes in 2006 and 125 bone carvings for commercial purposes in 2007, all wild source; unknown subspecies. ³⁹

³³ <https://www.iucnredlist.org/species/88421020/88421024>

³⁴ <https://www.iucnredlist.org/species/88420726/88420729>

³⁵ https://cites.org/sites/default/files/eng/cop/18/prop/020119_d/E-CoP18-Prop_draft-Giraffa-camelopardalis.pdf

³⁶ https://cites.org/sites/default/files/eng/cop/18/prop/020119_d/E-CoP18-Prop_draft-Giraffa-camelopardalis.pdf

³⁷ <https://www.iucnredlist.org/species/136913/51140803>

³⁸ <https://www.iucnredlist.org/species/174469/51140829>

³⁹ U.S. Fish and Wildlife Service import data. See Annex, Table 3.

Table 3. Raw data on U.S. imports (2006-2015) of giraffe specimens from select countries of origin.⁴⁰

Genus	Species	Wildlife Descr. ⁴¹	Qty	Unit ⁴²	Ctry ⁴³ Org	Ctry Exp	Purpose ⁴⁴	Source ⁴⁵	Ship Date	US Importer	Foreign Exporter
GIRAFFA	CAMELOPARDALIS	TRO	1	NO	ZW	ET	H	W	8/24/08		TAXIDERMY CO-OPERATIVE SOCIETY
GIRAFFA	CAMELOPARDALIS	JWL	3	NO	KE	KE	P	W	9/27/06		MOUNT KENYA ART GALLERIES
GIRAFFA	CAMELOPARDALIS	BOC	125	NO	KE	KE	T	W	11/27/07		
GIRAFFA	CAMELOPARDALIS	SKI	1	NO	NG	NG	P	W	12/22/2009		
GIRAFFA	CAMELOPARDALIS	TAI	1	NO	SO	IT	P		1/20/2009	VITTORIO TEDESCO ZAMMARANO	VITTORIO TEDESCO ZAMMARANO
GIRAFFA	CAMELOPARDALIS	HAI	1	NO	SO	IT	P		1/20/2009	VITTORIO TEDESCO ZAMMARANO	VITTORIO TEDESCO ZAMMARANO
GIRAFFA	CAMELOPARDALIS	BON	50	NO	SO	ZA	T	W	11/21/2012	TEXAS KNIFE SUPPLY(TKS)	AFRICAN KNIFE HANDLE SUPPLIES
GIRAFFA	CAMELOPARDALIS	HAP	1	NO	TZ	TZ	P	W	8/21/06		
GIRAFFA	CAMELOPARDALIS	JWL	20	NO	TZ	TZ	P	W	6/28/07		
GIRAFFA	CAMELOPARDALIS	JWL	670	NO	TZ	TZ	T	W	1/23/08	ART BY GOD	MENDA TAXIDERMY LTD
GIRAFFA	CAMELOPARDALIS	BOP	1	NO	TZ	ZW	P	W	7/2/06	TERRY ADAMS	VICTORIA FALLS HOTEL
GIRAFFA	CAMELOPARDALIS	TRO	1	NO	ZM	ZM	H	W	3/11/06		TAXIDERMY ENTERPRISES
GIRAFFA	CAMELOPARDALIS	TRO	1	NO	ZM	ZM	H	W	1/4/08		MUCHINGA ADVENTURES LIMITED
GIRAFFA	CAMELOPARDALIS	TRO	1	NO	ZM	ZM	H	W	12/16/08		CHARLTON MCCALLUM SAFARIS
GIRAFFA	CAMELOPARDALIS	TRO	1	NO	ZM	ZM	H	W	12/2/2011		BANGWEULU TAXIDERMY LIMITED
GIRAFFA	CAMELOPARDALIS	TRO	1	NO	ZM	ZM	H	W	11/10/2014	Exemptions 6 and 7(C) ⁴⁶	
GIRAFFA	CAMELOPARDALIS	SKI	1	NO	ZM	ZW	H	W	3/12/08		TAXIDERMY ENTERPRISES PVT LTD

⁴⁰ Source of Data: U.S. Fish and Wildlife Service, obtained under a Freedom of Information Act request.

⁴¹ Wildlife Descriptions: BOC (bone product or carving), BON (Bones (including jaws, but not skulls)), BOP (Bone pieces (not manufactured)), FOO (Foot), HAI (Hair), HAP (Hair product (including paint brushes, etc.)), JWL (jewelry (other than ivory jewelry)), LPS (Leather product (small manufactured including belt, wallet, watchband)), SKI (skin (substantially whole, including tinga frames)), SPE (Specimen (scientific or museum)), SPR (Shell product (mollusc or turtle)), TAI (Tails), TEE (Teeth (excluding tusk)), TRO (trophy (all the parts of one animal)).

⁴² Unit: NO = number of items.

⁴³ Country codes: CA = Canada, ET= Ethiopia, IT = Italy, KE = Kenya, LS = Lesotho, NG = Nigeria, SO = Somalia, TZ = Tanzania, ZA = South Africa, ZM = Zambia, ZW = Zimbabwe, XX = unknown.

⁴⁴ Purpose codes: H = hunting; P = personal; T = commercial; Q = travelling exhibit.

⁴⁵ Source code W = wild.

⁴⁶ USFWS redacted this information.

Genus	Species	Wildlife Descr. ⁴¹	Qty	Unit ⁴²	Ctry ⁴³ Org	Ctry Exp	Purpose ⁴⁴	Source ⁴⁵	Ship Date	US Importer	Foreign Exporter
GIRAFFA	CAMELOPARDALIS	BOC	8	NO	XX	CA	P	W	9/10/2013	Exemptions 6 and 7(C)	
GIRAFFA	CAMELOPARDALIS	HAI	1	NO	XX	ZA	P	W	8/15/08		
GIRAFFA	CAMELOPARDALIS	FOO	1	NO	XX	CA	Q	W	11/22/2011	AMERICAN MUSEUM OF NATURAL HISTORY	CANADIAN MUSEUM OF NATURE
GIRAFFA	CAMELOPARDALIS	HAI	20	NO	XX	LS	T	W	1/2/2013	ATHOL M FODEN DBA SAFARI GOLD USA	
GIRAFFA	CAMELOPARDALIS	BON	50	NO	XX	ZA	T	W	11/1/2011	MASECRAFT SUPPLY COMPANY	ARNO BERNARD KNIFE
GIRAFFA	CAMELOPARDALIS	BON	2	NO	XX	ZA	T	W	12/21/2011	TUDOR FARMS	HEART WOOD BOWS
GIRAFFA	CAMELOPARDALIS	BON	50	NO	XX	ZA	T	W	7/5/2012	MASECRAFT SUPPLY COMPANY	ARNO BERNARD KNIFE
GIRAFFA	CAMELOPARDALIS	BON	60	NO	XX	ZA	T	W	11/22/2012	GIRAFFE BONE KNIFE SUPPLY	AFRICAN KNIFE HANDLE SUPPLIES
GIRAFFA	CAMELOPARDALIS	BON	50	NO	XX	ZA	T	W	12/13/2012	MASECRAFT SUPPLY COMPANY	AFRICAN KNIFE HANDLE SUPPLIES
GIRAFFA	CAMELOPARDALIS	BON	40	NO	XX	ZA	T	W	3/7/2013	GIRAFFE BONE KNIFE SUPPLY	
GIRAFFA	CAMELOPARDALIS	BON	50	NO	XX	ZA	T	W	1/29/2014	TEXAS KNIFE SUPPLY(TKS)	
GIRAFFA	CAMELOPARDALIS	HAI	4	NO	XX	ZA	T	W	1/27/2012	SAFARI GOLD	PURE AFRIQUE JEWELLERS CC
GIRAFFA	CAMELOPARDALIS	LPS	62	NO	XX	ZA	T	W	5/24/2013	MASECRAFT SUPPLY COMPANY	
GIRAFFA	CAMELOPARDALIS	SPR	50	NO	XX	ZA	T	W	10/22/2014	Exemptions 6 and 7(C)	
GIRAFFA	CAMELOPARDALIS	TEE	1	NO	XX	ZA	T	W	3/19/2010	NATIONAL ORNAMENTAL MUSEUM	STELLENBOSCH UNIVERSITY