



THE UNITED REPUBLIC OF TANZANIA

NATIONAL AUDIT OFFICE



**A PERFORMANCE AUDIT REPORT ON THE MANAGEMENT OF WILDLIFE IN GAME
RESERVES AND GAME CONTROLLED AREAS**

THE MINISTRY OF NATURAL RESOURCES AND TOURISM



**A REPORT OF THE CONTROLLER AND AUDITOR GENERAL OF
THE UNITED REPUBLIC OF TANZANIA**

DECEMBER, 2013



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National Audit Office

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LIST OF ABBREVIATIONS

CITES	Convention on International Trade in Endangered Species of Wild Fauna and Flora
DED	District Executive Director
DGOs	District Game Officer
GCAs	Game Controlled Areas
GDP	Gross Domestic Product
GPS	Global Positioning System
GMP(s)	General Management Plan(s)
GRs	Game Reserves
HB	Hunting Blocks
IUCN	International Union for Conservation of Nature
LGAs	Local Government Authority
MNRT	Ministry of Natural Resources and Tourism
MTEF	Medium Term Expenditure Framework
NCAA	Ngorongoro Conservation Area Authority
PS	Permanent Secretary
SGR	Selous Game Reserve
SRF	Systematic Reconnaissance Flight aerial survey
TANAPA	Tanzania National Parks
TAWIRI	Tanzania Wildlife Research Institute
TISS	Tanzania Intelligence and Security Service
TZS.	Tanzanian Shillings
TWPF	Tanzania Wildlife Protection Fund
USD	United States Dollar
WMAs	Wildlife Management Area(s)
WD	Wildlife Division



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PREFACE

The Public Audit Act No. 11 of 2008, Section 28 authorizes the Controller and Auditor General to carry out Performance Audit (Value-for-Money Audit) for the purposes of establishing the economy, efficiency and effectiveness of any expenditure or use of resources in the Ministries, Independent Departments and Executive Agencies (MDAs), Local Government Authorities (LGAs) and Public Authorities and other Bodies which involves enquiring, examining, investigating and reporting, as deemed necessary under the circumstances.

I have the honor to submit the Performance Audit Report on the Management of Wildlife Hunting in Game Reserves and Game Controlled Areas in Tanzania to His Excellency the President of the United Republic of Tanzania, Dr. Jakaya Mrisho Kikwete and through him to the Parliament of the United Republic of Tanzania.

The report contains conclusions and recommendations that have focused mainly on enforcement of wildlife conservation law, monitoring of hunting activities and revenue collection from wildlife resources by Ministry of Natural Resources and Tourism on ensuring that the wildlife resources in Tanzania is managed economically, efficiently and effectively.

The Ministry of Natural Resources and Tourisms and Audited Districts have been given the opportunity to scrutinize the factual contents of the report and come up with comments on it. I wish to acknowledge that the discussions with the audited entities have been very useful and constructive in achieving the objectives of the study.

My office intends to carry out a follow-up at an appropriate time regarding actions taken by the audited entity in relation to the recommendations in this report.

In completion of the assignment, the office subjected the report to the critical reviews of the following experts namely; Prof. Vedasto G. Ndibalema from Sokoine University of Agriculture, Mr. Ladislaus W. Kahana from College of African Wildlife Management and Mr. Lota Melamari from Tanzania Land Conservation Trust who came up with useful inputs in improving the output of this report.

The report was prepared by Ms. Elizabeth Augustino - Team Leader and Mr. Michael Malabeja - Team member under the supervision of Eng. James G. Pilly - Assistant Auditor General and Ms. Wendy W. Massoy - Deputy Auditor General. Internal quality review was done by Eng. George C.



Haule - Assistant Auditor General. I would like to thank my staff for their valuable inputs in the preparation of this report.

My thanks should also be extended to the audited entities for their cooperation during the audit and their fruitful comments on the draft report.

Ludovick S. L. Utouh
Controller and Auditor General
Dar es Salaam,
December, 2013



EXECUTIVE SUMMARY

Tanzania is renowned throughout the world for its varied wildlife heritage and wonderful network of protected areas. The high diversity of wildlife species which is attributable to a variety of habitats found in Tanzania has classified the country as one of the 'mega diversity Nations'. Tanzania recognizes the sustainable utilization of its wildlife resources as part and parcel of conservation.

Wildlife sector is estimated to contribute about two percent the country's Gross Domestic Product (GDP). Tourist hunting generated more than 91 billion Tanzania Shillings in three years between 2009 and 2012. Despite this contribution realized from the wildlife sector, a number of problems make wildlife a concern, especially to the socio-economic status of the communities in bordering wildlife protected areas. These problems include: conflicts with other land uses, poaching, habitat loss, pollution, global warming and introduction of exotic species.

Poaching activities have been increasing in Tanzania. For example, in November 2010 various 120 live wild animals and 16 birds were exported illegally¹. Also, for the period from 2008 to 2013, there were 268 incidents involving seizure of ivory in Tanzania with a total weight of 17,743.8kgs.

Given the importance of the wildlife to the country's economy and the problems highlighted, the National Audit Office decided to conduct a Performance Audit on the Management of Wildlife Hunting Activities by the Ministry of Natural Resources and Tourism (MNRT). The purpose of this audit was to determine whether the MNRT appropriately monitors wildlife hunting activities and manages revenue generated in the game reserves and controlled areas.

The following is the summary of major findings, conclusion and recommendations arising from this performance audit:

The MNRT had never carried out a formal analysis to identify and map areas which are prone to risk of poaching. Elephant killing for tusks has been the only indicators to point out poaching in game reserves. 721 elephants are reported to have been killed by poachers in five game reserves from 2009 to 2012. However, due to lack of reliable data, total figure of killed elephants is estimated to far exceed the figures presented above.

Patrols are not regularly conducted during the rainy season, despite consistent poaching events. Surveillance coverage was 37% and 47% in

1. MNRT 2010/2011 budget speech



2010/11 and 2011/12 respectively. This is far below the set target of 60% coverage.

There was shortage of staff and equipment in all visited game reserves² and game controlled areas³ which impair performance efficiency.

2 out of 11 identified stakeholders are not actively involved by the ministry in control of poaching at the ports of exists. Processing informers' payments from the head office takes longtime. 60 % of culprits in Moyowosi-Kigosi were fined up to TZS. 50,000, which is far below the prescribed amount in the wildlife law.

Annual assessment of hunting companies was based on 40% utilization of quota and omitted other⁴ performance measures. There were incidences of non compliance with the trophy criteria set. There were no actions taken to non compliance or substandard trophies. 49% of the 108 hunting permit forms were not filled at all to indicate the habitat or ecology where the animals were hunted. A total of 366 wild animals in 2009 and 2011 were killed without quota allocation.

There was no in depth analysis done at the third year of the hunting term based on criteria set. None of the hunting companies submitted annual contribution of 5000 USD during the interim period. During 2009-2011 hunting season there was neither data related to problem animals nor elephant tusks.

Revenues estimation was based on previous performance. There was no scientific assessment done to be used as a basis for estimation. 36 companies did not pay the government bills for photographic tourism on time. Consequently the ministry lost a total amount of USD 1.7 million which is equivalent to TZS. 2.7 billion as at 11/12/2012.

There were no LGA which presented reports to the MNRT about expenditure of the use of 40% of the 25% funds received. Three districts namely Longido, Simanjiro and Loliondo were allocated less than 27% of the funds instead of 40%.

Generally, the audit office concludes that MNRT does not fully ensure that the wildlife law is effectively enforced. There are resources allocated for anti- poaching activities. Not all stakeholders are fully involved in law enforcement. Hunting activities are not monitored. Revenues are not fully collected from potential sources identified and the proportional distribution to parties is complex. The ministry itself failed to establish the exact proportion the parties received.

2. Selous, Rungwa, Moyowosi/Kigosi, Ugalla, and Lukwa-Lukwati

3. Lake Natron-Longido, Simanjiro, Loliondo and Kilombero

4. Other means hunting block condition, quality and availability of wild animal habitats, quality of trophy and wildlife population.



Based on the conclusion above the following are the recommendations

The Ministry of Natural Resources and Tourism should ensure that:

- risk analysis is carried out to enable realistic setting of target and allocation of resources
- appropriate strategies are set to eradicate poaching during rainy seasons
- necessary equipment is available in game reserves and in anti-poaching zones, and maintenance is done
- it carries out analysis of key stakeholders and actively involve them in combating poaching and fighting export of illegal trophies
- rates of fines and penalties charged help to reach the intended deterrent effect.
- game scouts posts in areas of high animal concentrations to facilitate vigilance and action when necessary.
- trophy and habitat quality assessment is carried out
- the review of payment of 5,000 USD annually by hunting companies is done to see if it saves the intended purpose, and if not change accordingly.
- hunting safari data and data from ant poaching are properly collected, documented and analysed and used in planning and decision making.
- datasheet/form filled by game warden/officers and village scouts, who accompany hunting clients is developed and used
- tourist hunting database on hunting companies, contribution to community development by hunting companies, or support to improve infrastructure, protection of the environment and contribution towards ant-poaching is developed
- game officers/wardens/scouts are trained to properly fill the permit.
- assessment on revenues from wildlife is done to benchmark the basis for revenue estimation.
- there is established system for collecting timely revenue from photographic tourism.



- controls set for revenue collection are reviewed and full collection is done.
- the distribution of funds should be governed by the proportional set and be in the position to identify which source contributes how much of the revenue collected from wildlife resources.
- LGAs with wildlife resources use the amount allocated by the Ministry to protect wildlife resources within their jurisdictions and in turn account for the disbursed funds to the Ministry



CHAPTER ONE

INTRODUCTION

1.1. Background

Tanzania is renowned throughout the world for its varied wildlife heritage and wonderful network of protected areas. The high diversity of wildlife species which is attributable to a variety of habitats found in Tanzania has made Tanzania classified as one of the 'mega diversity nations'. Tanzania recognizes the sustainable utilization of its wildlife resources as part and parcel of conservation.

The major forms of wildlife utilization in Tanzania are game viewing, tourist hunting, resident hunting, ranching and farming. These forms of utilization are the basis of the country's social and economic development through provision of employment, generation of foreign currency and market for local commodities, therefore contribution of wildlife hunting to economy of the country cannot be understated. The sector is estimated to contribute about two percent to the country's Gross Domestic Product (GDP). As an example, the tourist hunting generated more than 91 billions Tanzania Shillings in three years between year 2009 through 2012.

Despite this contribution, illegal killing of wildlife makes a concern, especially to the national economy and socio-economic status of the communities bordering wildlife protected areas. There has been increasing poaching activities in Tanzania recently. Unfortunately the Wildlife Division efforts have been ineffective to cope up with the surge of massacre taking place, and therefore the reports reaching the public ears is only about interceptions made on consignments of elephant ivory which were on the way to be shipped outside the country. For example, in November 2010 different 120 live wild animals and 16 birds were found to be exported illegally⁵. Also, there were five incidents where ivory seized in Tanzania shows a total weight of 17,743.8 kg (see Table 1 below).

5. MNRT 2010/2011 budget speech

**Table 1: Summary of Ivory seized in Tanzania**

Year	Kilogram	Percentage
2008	264	1
2009	1,623	9
2010	2,036	11
2011	2,757	16
2012	2,809	16
2013	8,254.8	47
Total	17,743.8	

Source: Elephant Trade Information System report

It is apparent from the Table 1 above, there has been steady annual increase of seized ivory in Tanzania from 264 kg (1%) in 2008 to 8,254.8kg (47%) in 2013. This is an assurance that more elephants are being butchered year after year, hence the cause of alarm.

Given the importance of the wildlife to the country's economy and the highlighted problems, the National Audit Office decided to conduct a performance audit on the management of wildlife hunting activities by the Ministry of Natural Resources and Tourism (MNRT).

1.2. Audit Objective

The overall objective of the audit was to determine whether the Ministry of Natural Resources and Tourism (MNRT) appropriately manages and monitors wildlife hunting activities and revenue generated in the Game Reserves and Game Controlled Areas.

Specifically, the audit aimed at examining: the extent to which the wildlife hunting regulation is enforced by responsible authorities; Efficiency of the MNRT in monitoring wildlife hunting in game reserves and game controlled areas; and Management of the collected revenue and allocation of the funds to the required LGAs by the MNRT.



The audit was based on the analysis of answers to three main questions as follows:

Audit Question 1: To what extent does the MNRT ensure wildlife hunting regulations are effectively enforced to prevent illegal use of animals?

Audit Question 2: Does the MNRT efficiently monitor wildlife hunting at game reserves and game controlled areas?

Audit Question 3: Is revenue from wildlife hunting properly collected, managed and allocated by the MNRT to the required LGAs?

1.3. Assessment Criteria

Management of wildlife hunting by the MNRT was assessed based on various criteria prescribed by the wildlife policy, Wildlife Act of 2009, Wildlife Regulations of 2010, MNRT strategic plans, Ministry of Finance guidelines for medium term plan and budget framework and other best practices.

Wildlife law enforcement was assessed based on the following criteria:

- the MNRT is required to protect wildlife against unlawful hunting, capturing, photographing and securing of trophies by enforcing the Wildlife law,
- the MNRT have to strengthen its capabilities to carry out anti-poaching operations with the aim to reduce and ultimately eliminate illegal taking of wildlife resources,
- the MNRT have to ensure that stakeholders are involved in conservation, management and development of the wildlife sector,
- the MNRT have to set-up an intelligence system to protect wildlife.

Monitoring of wildlife hunting by wildlife division was assessed based on the following criteria:

- the MNRT have to carry out annual performance assessment



and an in-depth analysis of the performance of all hunting companies at the third year of the hunting term,

- the MNRT have to require all hunting companies to record and report relevant details of all animals killed, wounded, or captured by hunters.

Revenue collection and distribution was assessed based on the following criteria:

- according to guidelines for the preparation of medium term plan and budget framework of MoF, MNRT is required to ensure that tax and non-tax current sources and potentials are explored, strategies for collection are well articulated and realistic projections are submitted to the Treasury.
- the MNRT is required to plan and evaluate its sources of revenue to increase revenue accrued from natural resources and tourism operations.
- the MNRT is required to issue and administer all user rights and trading licenses for wildlife resources and promote wildlife resources for economic development.

1.4. Audit Scope

The audit examined management of wildlife hunting in game reserves and game controlled areas by the Ministry of Natural Resources and Tourism as main audited entity. Game reserves (GRs) with size of at least 5000km² were studied. Six out of a total of 27 game reserves were selected. These are Selous, Rungwa, Kigosi, Moyowosi Ugalla and Rukwa-Lukwati. Similarly, in a total of 39 game controlled areas (GCAs), four were selected which are Kilombero, Lake Natron, Loliondo, and Simanjiro for examination. Because of homogeneity of GRs and GCAs, we were able to select six GRs and four GCAs as representative sample for the audit purpose.

Similarly, in a total of 39 game controlled areas (GCAs), four of them of a size ranging between 3000 km² and 4280 km² were selected. These are Kilombero, Lake Natron, Loliondo, and Simanjiro for examination. Because of homogeneity of GRs and GCAs, we were able to select six GRs and four GCAs as representative sample for the audit.

Field visits were conducted in three out of eight anti-poaching units based in Dar es Salaam, Arusha, and Tabora.

In the enforcement of wildlife laws to prevent illegal use of animals, the



audit examined identified areas for conducting patrols if they consider risks; set targets and conducted patrols.

Allocation of resources for anti-poaching was based on the annual amount allocated by the MNRT to GRs and GCAs. Monitoring of hunting activities was based on whether mechanism to assess performance of the WD, GRs, GCAs and hunting companies are in place and effective. In the case of revenue projection and collection, the audit focused on the revenue generated from tourist hunting.

The audit examined both monitoring of tourist hunting and residents hunting in the selected game reserves and game controlled areas. In addition, the performance measurement, data recording management and use of information generated were looked at as well as the commitment of the Ministry to reduce unlawful utilization of wildlife resources. The functions were examined in relation to mandate given by the Policy and legal framework for the management of Wildlife protected Areas in the country which fall under the mandate of the Wildlife Division of MNRT and are thus part of its mission and strategic plan.

The audit covered the period from 1st July 2009 to 31st March 2012 due to the fact that hunting season starts 1st July and end 31st March.

1.5. Audit Methodology

The audit was conducted in accordance with INTOSAI standards. These standards require that the auditing is planned and performed in order to obtain sufficient and appropriate evidence to provide a reasonable basis for the findings and conclusions based on audit objectives. It is believed that according to the audit objectives, the evidence obtained provides a reasonable basis for the findings and conclusions reached.

Various methods of gathering data and information such as documentary reviews, interviews and physical observation have been used in the conduct of this audit. Appendix 2 provides details of methodologies used in the audit.

1.6. Data Validation

The information was discussed with practicing scientists from TAWIRI and other institutions in the wildlife sector in Tanzania. The Ministry of Natural Resources and Tourism was given an opportunity to go through the draft report and confirmed on the accuracy of the information that



was presented.

1.7. Structure of the Audit Report

The remaining part of the audit report covers the following:

Chapter two presents the key stakeholders and their responsibilities in the administration of wildlife hunting in Tanzania. It also describes the various steps and processes involved in law enforcement, monitoring of wildlife hunting and management of finances;

Chapter three presents the findings on enforcement of wildlife conservation laws and regulations in management of wildlife hunting activities;

Chapter four presents the findings on monitoring of wildlife hunting activities;

Chapter five presents the findings on the management of revenue generated from wildlife hunting and photographic tourism;

Chapter six provides the conclusions of the audit; and

Chapter seven presents recommendations to the different actors in the wildlife hunting activities.



CHAPTER TWO

SYSTEM FOR WILDLIFE HUNTING ADMINISTRATION IN TANZANIA

2.1 Introduction

This chapter provides description of the system and processes in the management of wildlife hunting activities in the country specifically on wildlife law enforcement, monitoring and revenue collection. Also, addresses the issues of legal framework and management of wildlife hunting key stakeholders.

2.2. Legislation Concerning Wildlife Hunting Activities

The Wildlife Conservation Act of 2009

The objective of the Wildlife Conservation Act (WCA) of 2009 is to enhance the protection and conservation of wildlife resources and its habitats in game reserves and game controlled areas, wildlife management areas, dispersal areas, migratory route corridors, buffer zone and all animals found in areas adjacent to these areas, by putting in place appropriate infrastructure, sufficient personnel and equipment; In addition, this Act promote and enhance the contribution of the wildlife sector to the sustainable development of Tanzania and the conservation and management of wildlife and natural resources for the benefit of present and future generations, without any discrimination; Also, to foster sustainable and legal use of wildlife resources and take appropriate measures to prevent illegal use of wildlife.

The WCA applies to all establishments in the central government, local government, public authorities and Agencies. Also, it applies to private and local communities which deal with wildlife issues.

The Wildlife Policy of Tanzania of 2007 provides direction for wildlife sub sector in sustainable conservation of wildlife and wetland resources. The wildlife conservation tourist hunting regulations of 2010 provide day to day guidelines of all activities related to tourist hunting.

Other principal legislations in wildlife sector includes the Wildlife Conservation (The Tanzania Wildlife Protection Fund Financial Regulations, 2002), The Conservation on International Trade in Endangered Species of Wild Fauna and Flora (CITES) (Implementation) Regulations, 2005, The Wildlife Conservation (Capture of animals) Regulations, 2010, and the Wildlife Conservation (Dealings in trophies) Regulations, 2010.



Conventions and protocols

Tanzania has ratified various regional and international conventions and protocols for wildlife resources conservation and protection. These show a commitment to specific principles, objectives and course of action.

The main conventions relevant to management of wildlife hunting are:

- Convention on International Trade in Endangered Species of Wild Fauna and Flora (CITES)
- Convention on Biological Diversity (CBD) of 1992
- Lusaka Agreement on Co-operative Enforcement Operations directed at illegal trade in wild fauna and flora
- Convention on Migratory species

2.3 Key Stakeholders on Management of Wildlife

Various actors are involved in the management of wildlife hunting in Tanzania. The following are the major actors with their roles:

The Ministry of Natural resources and tourism (MNRT) - Wildlife Division (WD)

The Ministry through division of wildlife is responsible for:

- formulation of policy, strategies and programs for policy implementation;
- issuing and administering all types of user rights and trading licenses for wildlife resources;
- promoting information sharing and exchange of expertise nationally, regionally, and internationally;
- protecting wildlife against unlawful utilization relating to the hunting, capturing, and photographing of wildlife and securing of trophies.
- carrying out an annual performance assessment and an in-depth analysis of the performance of all hunting companies at the third year of the hunting term;
- ensure that all hunting companies record and report relevant details of all animals killed, wounded, or captured by hunters.



Vision and Mission

The MNRT vision is to have a: ‘Well conserved and sustainably managed and utilised natural and cultural resources and developed responsible tourism’.

The vision for the wildlife sub-sector is sustainable conservation of wildlife and wetlands resources.

The mission of the Ministry is ‘to conserve and regulate utilisation of natural and cultural resources and develop low volume and high yield tourism for the benefit of present and future generations’.

The mission of the wildlife sub sector is to conserve, manage and develop wildlife and wetland resources and sustainable utilization that will contribute towards poverty reduction.

Objectives

According to the MNRT Strategic Plan for the period from 2010-2013, the main objectives in relation to the wildlife management are:

- stakeholders’ involvement in sustainable management and utilisation of natural, cultural resources and tourism operations increased
- revenue accrued from natural, cultural resources and tourism operations increased
- law enforcement in management of natural and cultural resources and tourism operations strengthened
- institutional capacity to deliver services effectively and efficiently attained.

Management structure of wildlife hunting in Tanzania

Wildlife division is headed by director of wildlife and assistant directors responsible for Utilization, law enforcement, development and training. In law enforcement, there are zonal ant-poaching offices headed by zonal ant poaching commanders. There are eight ant poaching zones namely Arusha, Dar es salaam, Songea, Tabora, Manyoni, Mwanza, Iringa and Bunda.



The Tanzania Wildlife Protection Fund (TWPF)

The TWPF has been established by the MNRT with the objective of facilitating and supporting wildlife conservation, inside and outside protected areas particularly in:

- ant-poaching operations and law enforcement
- Operations of the Wildlife Protection Unit
- the conservation of wildlife
- conservation education, training and awareness creation in wildlife matters
- capacity building in wildlife management
- the wildlife management research
- any other activity related to conservation of wildlife.

Local Government Authorities (LGAs)

LGAs are responsible for the implementation of wildlife policy within their jurisdiction by formulating and enforcing laws, preparing sound physical and development plans that protects wildlife and wetlands.

Hunting Companies (Private Sector)

Hunting companies are responsible for supporting the government in the conservation, development and sustainable utilization of wildlife resources through investing in the wildlife sector. According to Wildlife Conservation Act 2009, hunting companies are required to record and report relevant details of all animals killed, wounded, or captured.

Non Governmental Organisations (NGOs)

The role of local and international NGOs is to support the government financially and technically in conservation, management and development of wildlife and wetlands resources. In particular, the role of NGOs is to provide conservation education to the public and assisting district councils in provision of extension services.

Other stakeholders

MNRT is working in collaboration with other stakeholders such as TANAPA, TAWIRI, NCAA, Police, TISS and Airport Authorities in protection and wildlife law enforcement.



2.4 Enforcement of Wildlife Conservation Law

In order to ensure the enforcement of the Wildlife Conservation Act of 2009, sections 10 and 11 of the Act provide for the establishment of an Anti-poaching unit. The unit is divided into eight (8) stations in the country. Among many functions the unit is responsible for planning and coordinating anti-poaching operations, conducting surveillance, gathering intelligence information in and outside the game reserves and game controlled areas. Also, protect people and their properties against problematic animals and observe International and Regional agreements in conservation in which Tanzania is part of. Moreover, the officials in the game reserves and game controlled areas are responsible for conducting surveillance in their respective areas.

As best practice, planning for patrols is essential. The MNRT has to identify and map the poaching hotspot areas within and around game reserves and game controlled areas. The risk analysis needs to be done and results obtained from analysis should be used in plans and strategies preparations and setting inspection priorities to be used as basis for allocation of resources for patrol and inspections.

Collection of data and information from patrols, intelligence, communities is important so as to identify poaching hotspots close to reserve. Analysis of the data and reporting is important as part of information management.

In the process of gathering intelligence⁶ information, the unit use informers⁷ identified in different places of game reserves and game controlled areas. When the informers successfully facilitate the arrest of defaulters, they receive awards from the Director of Wildlife.

According to MNRT strategic plan of 2010-2013, the ministry was supposed to strengthen its capacities to carry out anti-poaching operations. Assessment for the capacity of WD to carry out anti-poaching operations was expected to be based on the allocated and effective use of available budget, human resources and equipment.

There are a number of stakeholders involved in the wildlife management. The MNRT is supposed to ensure that all stakeholders are effectively engaged in anti-poaching activities, conservation, management and development of wildlife.

6. Intelligence can be defined as any product resulting from any formal collection, processing, integration, evaluation, analysis and interpretation about areas of actual or potential operations

7. Informers means individuals who in good faith supply the information which facilitate in arresting offenders who violate the wildlife law and regulations.



2.5 Monitoring of Hunting Activities

Performance monitoring is a process which involves collection of data to ensure that planned results are achieved and provides information to management for decision making.

Performance monitoring depends on plans and indicators development.

The MNRT carries out two types of monitoring which are annual assessment and an in depth analysis at the third year of the hunting term.

Annual Assessment

The Wildlife Conservation Act of 2009 requires an annual assessment of all hunting companies to be carried out. The ministry established performance measurement to assess the performance of hunting companies annually. The following are performance measures:-

- wild animal population according to census conducted by TAWIRI
- hunters' success
- quality and size of trophies
- quality and availability of wild animal habitats⁸
- scarcity, plenty and type of hunted animals
- hunting block actual condition/situation e.g. migration of animals, characteristics of animal feeds and breeding areas of some animals
- compliance with International regulation/agreement e.g CITES

In-depth Analysis

The MNRT is required to carry out an in-depth analysis of the hunting companies in the third year of their tenure. The following are criteria used for evaluation of the performance of the hunting company:

- hunting company should utilize the hunting block allocated and score at least 40% of the value of the key animals
- the level of revenue collected from photographic tourism depends on the category of the hunting blocks
- the applicant has been contributing through the Permanent Secretary of the ministry an amount of not less than USD 5,000

8. The issues to be reported are location of animal sighting (e.g near or at the water sources, habitat miombo woodland, shrubs, distribution of animals).



to the implementation of various community development projects within and adjacent area of operation

- the level of applicant's contribution to the improvement of infrastructure and protection of the environment within his hunting block
- the level of the applicant's contribution towards ant poaching operations or any other bad intentioned persons in issues of wildlife conservation
- the applicant's record regarding the export of trophies to relevant clients.

Resident Hunting

The Director of Wildlife allocates animal quota to the Districts with game controlled areas and areas outside protected areas that are not allocated for tourist hunting.

The director enters into joint management agreement with the District Councils or registered resident hunters association to manage the area designated for resident hunting. The District Game Officer is authorized to issue resident's hunting licenses in accordance with the animal quota allocated by the Director to the District. Where a resident hunter has hunted an animal, he is required to produce the license and hunting identity card within 30 days to authorized officer. The officer is required by the Wildlife Conservation Resident Hunting Regulation 2010 to record all animals hunted.

2.6 Revenue Collection and Distribution

Revenue collection

Revenue from wildlife is collected from the following identified sources namely: game fees, block fees, capture permit fees, certificate of ownership, trophy dealer license and trophy export certificate. Permit fees, conservation fees, observer fees, trophy handling fees, hunting block application fees, professional hunters' license fees and penalties.

Controls to ensure estimated revenue is collected

Term ownership of hunting block requires a person applying for hunting block for tourist hunting to submit a formal application.



The application should be sent to the Director of Wildlife and follow other procedures as stipulated in the wildlife regulations.

The hunting company has to apply for a permit for the client and fill required details and pay for permit. The permit shows the type and amount of animals to be hunted.

The invoice indicates the animal species, number of animals to be hunted and the prices to be paid. The invoice also, shows distribution of funds collected. It was noted that, controls in issuance of invoices does not work well with photographic tourism. In photographic tourism, payment is done after the tour has been concluded.

Revenues distribution

Revenue collected from identified wildlife resources is distributed to MNRT account and TWPF. The Selous Game Reserves is allowed to retain 50% of the revenues collected. The retention emanated from the conservation project with German which required Tanzania to contribute by retaining 50%. Other GRs and GCAs did not have such privilege because the project was not extended to them. As regards to LGAs with wildlife population, funds are distributed based on the percentage of amount collected from game fees, block fees and professional hunters' license. The following is the proportional allocated amount:

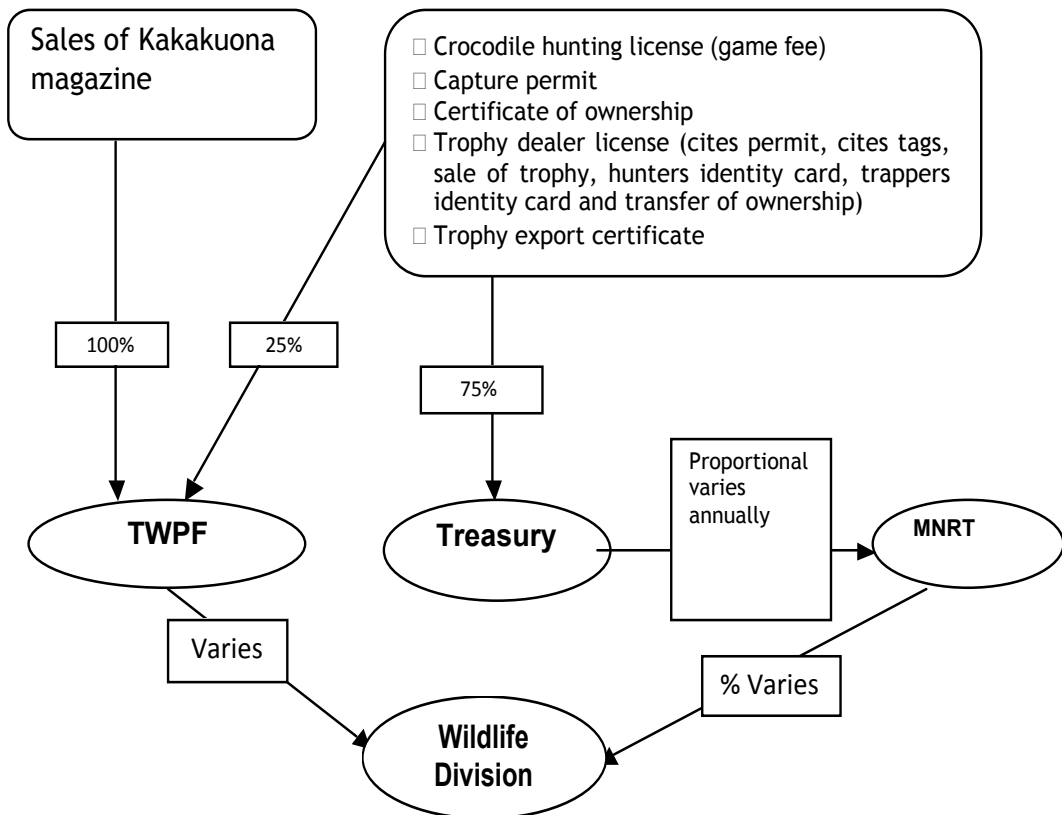
Tanzania Wildlife Protection Fund (TWPF)

TWPF receives 25% of revenue collected from game fees, block fees, capture permit fees, certificate of ownership, trophy dealer license and trophy export certificate. 75% of the revenue collected from the mentioned sources is deposited to Treasury. From Selous Game Reserve, 25% revenue collected from professional hunters license, conservation fees, permit fees, photographic tourism and penalties. Also, 100% fees from trophy handling, hunting block application and professional hunters' examination in SGR are retained by TWPF. Another, 100% of revenue collected from other game reserves except Selous and game controlled areas includes permit fees, conservation fees, observer fees, trophy handling fees, hunting block application fees and penalties. Other source of funds is collection proceeds from the sale of the Kakakuona magazine.



The collected revenue is used by the Fund for supporting and facilitating wildlife conservation and protection activities in game reserves and game controlled areas. The distribution to wildlife division depends on the collection of revenues in the year and as per approved budget. The distribution of resources collected is as depicted in Figure 1 below:

Figure 1: Distribution of Revenue Collected from trophy dealers and other sources



Source: MNRT Accounts section Revenue allocation analysis



Selous Game Reserve

Selous Game Reserve is the biggest reserve with the size of over 50,000 sq. km. The reserve is allowed retention of 50% of the revenue generated from game fees, block fees, professional hunters license, conservation fees, permit fees, revenue from photographic tourism and penalties. Another 50% from game fees, block fees and professional hunters license is distributed between TWPF and Treasury by 25% each. The proportional amount sent to MNRT varies annually and depends on the amount of revenue collected and deposited to Treasury and the Ministry's approved budget.

MNRT Permanent Secretary

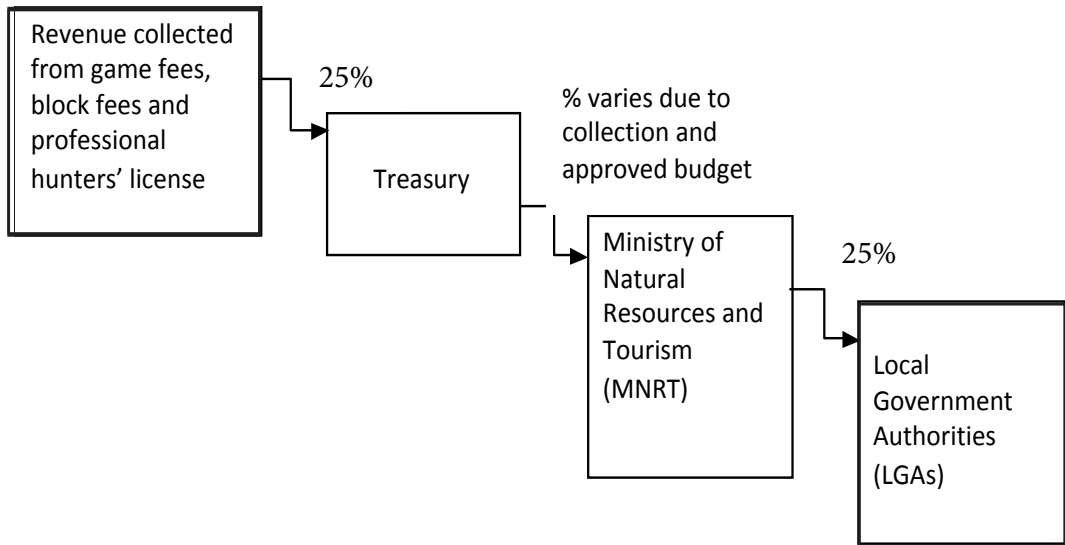
MNRT Permanent Secretary receives 75% of revenue collected from game fees, block fees, capture permit fees, certificate of ownership, trophy dealer license and trophy export certificate. Also, 25% of revenues generated from game fees, block fees and professional hunters license fees in all game reserves and game controlled areas. All revenues i.e 100% collected by ant poaching units from penalties for offenders are deposited directly to the Permanent Secretary's account. These revenues are deposited to Treasury Account and ploughed back to the Ministry. The proportion sent to the MNRT varies annually and depends on the amount of revenue collected and deposited to Treasury and the Ministry's approved budget. The distribution to Wildlife Division and LGAs depend on how much the Ministry received from Treasury.

Local Government Authorities (Councils)

Revenue collected from resident hunting in the LGAs is retained in their respective councils as own source. To facilitate management of wildlife activities in their areas of jurisdiction, the LGAs receive funds from the MNRT. These are based on the percentages as follows:



Figure 2: Revenue collected from tourist hunting in GCAs





CHAPTER THREE

ENFORCEMENT OF THE WILDLIFE CONSERVATION LAWS

3.1 Introduction

This chapter presents findings on the performance of the MNRT in enforcing the Wildlife Act and Regulations to protect wildlife against unlawful hunting, capturing, photographing and securing of trophies. Key issues covered include identification of the poaching hotspots and conducting patrols to reduce poaching; allocation and use of resources for anti-poaching programs in the game reserves and controlled areas; intelligence system and administration of wildlife related cases in the courts of law.

3.2. Identification of Poaching Hotspots and Patrol to Reduce Poaching

As explained under section 2.4 of this report, the MNRT was expected to identify and map the poaching hotspot areas within and around game reserves and game controlled areas. According to interview with anti poaching officials, there are known areas which are hotspots for poaching. However, the wildlife division had not carried out a formal analysis to identify and map areas which are prone to risk of poaching.

Based on interviews with anti-poaching officials, various data was supposed to be gathered from patrol teams in the field. However, patrols were not effectively conducted in areas thought to be of high poaching risk. The main reason is that most of poaching hotspot areas are located in remote areas where game officials cannot reach by cars especially during rainy seasons.

The WD does not have standardized method or formal recording sheet to identify and quantify the poaching hotspots. This has lead to improper gathering of events during patrol. When patrol teams go into the reserves they rely on information from informers. Whereas in the field patrol crews use field experience to identify poaching signs like the remains of human footmarks in the bushes, sounds of explosions from guns, bicycle tracks and elephants carcasses. According to interview with officials from four visited anti poaching units, patrols are basically reactive and ad hoc based on scanty information received from informers.



Photo 1: Elephant carcass found during patrol in Ugalla Game Reserve

Elephant killing to obtain tusks has been the only indicator to point out poaching in game reserves as records of the elephant mortality in the five visited game reserves (Table 2) reflect.

According to data compiled by Monitoring of Illegal Killing of Elephants (MIKE) programme, information of elephants killed according to CITES is as follows:

Table 2: Number of Elephant killed years 2009 to 2012

Year	S-M-U	R-R	R-K	T-M	Total
2009	48	1	4	0	53
2010	107	16	12	21	156
2011	143	32	25	1	201
2012	70	78	27	12	187
Total	368	127	68	34	597

Source: Monitoring of Illegal Killing of Elephants programme reports

As shown in the table above, information available does not include GCAs statistics. This is because ecosystem does not capture information from GCAs.

The abbreviations used in Table 2 means the following:

- S-M-U refers to Selous, Mikumi and Udzungwa;



- R-R refers to Rungwa Ruaha;
- R-K refers Rukwa Katavi; and
- T-M refers to Tarangire - Manyara.

However, information received from the WD regarding elephant mortality shows as follows:

Table 3: Elephant Mortality per GRs

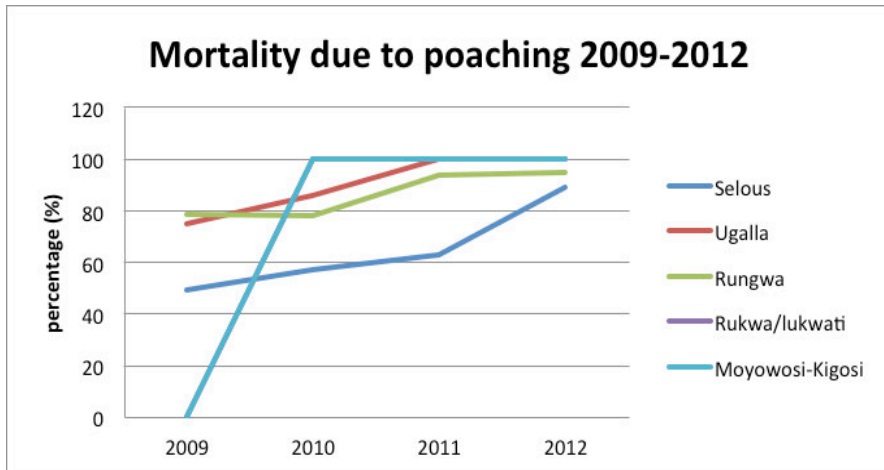
Poaching	2009	2010	2011	2012	Total
Selous	47	106	141	140	434
Ugala	40	48	19	3	110
Rungwa	15	14	32	40	101
Rukwa/lukwati	-	12	2	22	36
Moyowosi-Kigosi	-	18	18	4	40
Total	102	198	212	209	721

Source: MNRT-Elephant Mortality reports

As shown in Table 3, a total of 721 elephants were reported as killed by poachers in five game reserves from 2009 to 2012. However, due to lack of reliable data, total figure of killed elephants is estimated to far exceed the figures presented above.

In comparison between elephants killed due to poaching and elephant killed due to other causes⁹ of mortality, those killed due to poaching far outweigh other causes of mortality in the five game reserves (Figure 3). Poaching has shown an increasing trend in all game reserves (For three consecutive years). Accordingly, the increasing trend has been due to the recent increase of market pressure demanding for the elephant tusks.

⁹. Other causes refer to sport hunting, accidents, diseases, problem animal, natural mortality and unknown causes.

**Figure 3: Mortality due to poaching 2009-2012**

Source: MNRT-Ant-poaching unit

According to interview with WD officials mortality statistics are collected according to ecosystem and not as per GCAs. On that basis Loliondo and Lake Natron in Longido fall under the Serengeti-Ngorongoro ecosystem; Simanjiro fall under the Tarangire -Lake Manyara ecosystem; and Kilombero fall under the Selous-Mikumi ecosystem. Thus it is not possible to get data as per GCAs.

3.3 Conducting Patrols

Game reserve conducts patrol for 10 to 20 days each month whereby each patrol trip (section) has a minimum number of 7 to 10 staff. In game controlled areas, patrols ranges from 5 to 10 days a month. The patrol team goes into places within the game reserves and game controlled areas based on the information received from informers. Gaps exists in patrol trips during rainy seasons and dry seasons in areas informally identified as leading poaching hotspots in the visited game reserves and game controlled areas (See Table 4 below).

**Table 4: Frequency of patrols conducted in five GRs and four GCAs**

GRs/GCAs	Frequency of Patrol (Rainy season)	Frequency of Patrol(Dry season)
	December-April	June - December
Selous	Seldom	20 days each month
Rungwa	Seldom	10-15 days each month
Rukwa-Lukwati	Seldom	10-15 days each month
Moyowosi	Seldom	10-15 days each month
Ugala	Seldom	Frequently
Longido-Lake Natron	Seldom	10 days every month
Simanjiro	Seldom	Twice a month for five days
Loliondo	Seldom	10 days every month
Kilombero	No patrol	Once in every three months

Source: Respective GRs and GCAs

It is evident (Table 4) that patrols are not regularly conducted during the rainy season, despite consistent poaching events. Interviews with officials from the five GRs and four GCAs sampled showed that during rainy seasons, condition of the roads in those areas are not good thus patrol cars and trucks cannot navigate through muddy roads. As a result, patrol teams are forced to wait until rainy season is over. During rainy season patrol teams put more effort outside poaching areas such as along the roads and markets in town to apprehend trophies from the game reserve. However, poachers accessed the same hunting areas during such time.

Based on interviews with game managers, high rate of poaching occurs during the rainy seasons when patrols are not conducted in the GRs and GCA. Despite these facts, the audit observed that, the WD has not established an alternative way of fighting poachers during the rainy seasons. Since poachers tend to access the areas during the rain season, the WD has not established a counteracting mechanism to intercept the poaching activities during that time. Documentary review shows that the MNRT has five aircrafts that were bought specifically for patrol activities. However, according to interview with the WD officials, these aircrafts are mainly used for administrative activities due to poor visibility.

Evaluation of the conducted patrols

The Ministry uses the man-days approach to evaluate patrol activities. This is the number of days the team spent in the field. However, it was found out that there are no documented guidelines to follow when planning patrols, resulting into uncertainty for each game officer in the execution of their responsibilities.



The common practice employed by the patrol teams is to set up a camp at a certain point in the bush where they stay for the 10-20 days. During this time, the team moves to various locations in the bush following foot prints as indicators of poaching incidences.

In the visited game reserves it was noticed that maps were not adequately used to cite a specific area for patrol. Officials in Ugalla Game Reserve and all four game controlled areas did not have global positioning system (GPS) .

The patrol team reports to the MNRT occurred poaching incidences in their respective areas. Daily reports are provided through phones. Based on the poaching incidences which occurred daily, Game Officers compile weekly, monthly and quarterly reports and submit them to the ministry. The report contains information on performance of the anti-poaching, number of poachers caught, and objects confiscated (i.e. carcasses, fire arms, snares, trophies etc). The audit found also that, the collected data was not scientifically analyzed to assess trends in poaching and the strategies used in particular areas.

3.4 Resources Allocated For Anti-Poaching Activities

Assessment for the capacity of WD to carry out anti-poaching operations based on the allocated budget, human resources and equipment is as shown hereunder:

Budget Allocation for Anti-Poaching Activities

Budget preparation is done each year and funds for ant-poaching activities are received from two sources, namely treasurer and TWPF (the fund aim at protecting wildlife resources). In 2010/11 TZS. 10.0 billion was budgeted for the ant poaching activities but the actual amount received was TZS. 8.0 billion. Similarly in 2011/2012 the budget was TZS. 14.9 billion while the actual amount received was TZS. 10.2 billion as shown in the Table 5. In 2011/12 TWPF funds released approximately TZS. 7.3 billion while the portion from Treasury was TZS. 2.88 billion and 2010/11 the Fund released approximately TZS. 5.6 billion while the Treasury released an estimated amount of TZS. 2.43 billion.

**Table 5: Budget vs. Actual expenditure to poaching activities**

Year	Budget (Billions TZS)	Actual expenditure (Billions TZS)
2010/11	10.0	8.0 ¹⁰
2011/12	14.9	10.2 ¹¹

Source: TWPF and Annual Implementation Progress Report 2010/11 and 2011/12

The Ministry is serving 27 game reserves with a total coverage area of 113,460 km². The annual target set by the Ministry is to conduct surveillance for 60% of the total coverage which is equal to 68,076 km² with a budget of TZS 10 billion and TZS 14.9 billion for the years 2010/11 and 2011/12 respectively. The accepted norm to protect protected areas across southern and eastern Africa¹² is 200 USD per km² equivalent to TZS 320,000 per km². This implies that a budget of TZS 21.8 billion would be sufficient to cover the targeted 60% of the total area. Comparing with the amount of money received for the period of 2010/11 and 2011/12 and the norm/standard set, the wildlife division managed to conduct surveillance covering 25,135 km² and 31,825 km² a year. This is equivalent to 37% and 47% a year which is well below the set target of 60% for the respective years.

During the audit, it was found out that the game reserve managers are unaware of the approved budget of their reserves. Although GRs prepared their work plans, these plans to a large extent were not implemented. Their plans were not fully supported by funds from the MNRT. In most cases implementation of activities in the GR tend to wait until such times when the funds are received from the MNRT.

The Wildlife Division of the Ministry releases funds to the GRs based on the approved budget for the division. Five visited GRs submitted their draft budget to the MNRT HQ. However feedback on the approved budget for each GR was not sent to allow re-adjustment of their planned activities. The available evidence suggests that distribution of funds do not follow the activity-based budget and plans of each GRs. In addition, there is no documented criterion for distribution of ant-poaching funds to GRs in place as shown in Table 6.

10. TWPF MTEF 2011/12 + Annual implementation progress report 2011/12

11. TWPF MTEF 2011/12 + Annual implementation progress report 2011/12

12. Cumming, D.H.M (2004). performance of parks in century of change. In: Parks in transition: biodiversity, rural development and the bottom line. Ed B. child. Earthscan, London (from CITES report Cop 15 Doc 68 page)

**Table 6: Individual game reserves: Surveillance coverage achievement versus funds allocated**

Game reserves	Financial year	Actual amount (expenditure) (TZS) ¹³	Percentage of area covered during patrol
Ugalla (5000 sq km)	2009/10	120,600,000	7.5
	2010/11	107,500,000	6.7
	2011/12	196,117,000	12.3
Moyowosi/ Kigosi (21,060 sq km)	2009/10	-	-
	2010/11	245,690,000	4.0
	2011/12	310,588,000	5.0
Rungwa (17,000 sq km)	2009/10	157,466,128	3
	2010/11	251,017,200	5
	2011/12	407,146,544	7.5
Selous ¹⁴ (50,000 sq km)	2009/10	1,859,802,845	11.6
	2010/11	2,025,847,277	12.7
	2011/12	3,194, 427,705	20.0

Source: Respective GRs

Table 6 shows the patrol coverage in five GRs ranges from 3% - 20%. Large parts of the game reserves are not covered during patrols. Interview with GRs project managers on actions taken to address this problem revealed that game reserve managers usually receives support from hunting companies who join efforts in doing patrol.

GRs managers also pointed out untimely release of funds for the patrol that affected implementation of various planned patrol activities as well as payment of allowances to staff engaged in those activities. As stated by GRs officials, delay in funding may result into reduced staff morale thereby increase likelihood to collude with the 'would be' poachers, and leakage of intelligence information. Most poachers and dealers of poached products are aware of the government inability to avail regular transport and funds for anti-poaching activities, hence capitalize on that weakness by increasing the destruction of wildlife in the country's game reserves.

13. Treasury and TWPF

14. Total funds from Treasury, TWPF and Donors



Game Controlled Areas (GCAs) ant-poaching activities are funded by the Local Government Authorities (LGAs) in their respective areas. According to the issued guidelines on the allocation of funds, 40% of the 25% allocated by the Ministry to the LGAs is supposed to finance the activity. Table 7 shows the funds budgeted against actual amount received in GCAs.

Table 7: Funds budgeted against received by the GCAs in Thousands Shillings

Year		Kilombero	Simanjiro	Longido	Loliondo
2009/10	Budget	9,310	-	-	-
	Actual	6,773	-	-	-
	Shortfall	27			
2010/11	Budget	10,044	-	-	-
	Actual	4,491	-	-	-
	Shortfall	55			
2011/12	Budget	8,234	-	-	-
	Actual	7,008	-	-	-
	Shortfall	15			

Source: GCAs

Based on Table 7 above, Actual amount received for Kilombero GCAs was less than the funds budgeted to support anti-poaching activities. The team did not get information of budget from Simanjiro, Longido and Loliondo. However, the LGAs received 25% of the game fees from MNRT to support ant-poaching activities. It was noted that less than 40% of 25% fund received is allocated for anti-poaching activities which indicates lack of seriousness and commitment by the respective LGAs in protecting wildlife.



3.5 Use of Available Human Resources in the Game Reserves

Game reserves and controlled areas in Tanzania are diverse in composition and size. Acceptable standards require one staff to patrol a maximum of 25 km². Table 8 depicts the distribution of staff in the visited game reserves and game controlled areas (See Appendix 4 for details).

Table 8: Human resources available for patrol activities against patrolled area

Location	Size of the area (km ²)	% of available staff	% of area patrolled
Selous GR	50,000	15.3	0.3
Rungwa GR	17,000	10.4	1.6
Moyowosi/ Kigosi GR	21,060	3.6	1.6
Ugalla GR	5000	15.5	3.2
Lukwa -Lukwati GR	9,569	10.9	2.4
Longido-Lake Natron GCA	3000	40.1 ¹⁵	2.1
Simanjiro GCA	4280	7	8.3
Loliondo GCA	4000	6.2	10.0
Kilombero GCA	3607	7.7	7.2

Source: Respective GRs and GCAs

Table 8 portrays a serious shortage of staff in each game reserve. Selous and Ugalla GR seem to perform relatively better when it comes to staff-area ratio among GRS, while Lake Natron perform well among GCAs compared to Kilombero, Loliondo and Simanjiro GCA. On the other hand, three GCA appeared to cover close to 10% of the area in patrol while six GRs and one GCA cover less than 4% of their area.

Allocation of patrol tools in GRs and GCAs

According to interviews with game officials in all visited areas, patrol tools and equipment are vital in facilitating enforcement activities including patrols. These are such as vehicles, fire arms, radio calls, camera, tents, night vision glasses, bullet proof jackets and global positioning system.

The global positioning system is used to locate the areas and provide the direction to easy the patrol activities. Also, it increases accuracy of the locations. Table 9 shows a ratio of human resources available to patrol tools and equipment in selected game reserves and game controlled areas.

15. 5 staff from DED and 42 game scout from WMA



Table 9: Ratio of human resources available to patrol tools and equipment

GRs and GCAs	Ratio of human resources available per:					
	Vehicles	Radio calls	camera	GPS	Tents	Guns
Selous	8	0	0	0	***	1
Rungwa	9	0	0	21	9	
Lukwa-lukwati	7	0	0	5	6	***16
Moyowosi	6	0	0	64	11	5
Ugalla	***	0	0	0		
Lake Natron-Longido	5	0	0	0	0	***
Simanjiro	12	0	0	0	0	2
Loliondo	10	0	0	0	0	5
Kilombero	14	0	0	0	0	1

Source: Respective GRs and GCAs

Table 9 shows with the exception of Kilombero, Loliondo and Simanjiro GCA, patrol cars available carry between 5-9 staff during patrol. All ten visited areas do not have radio calls for easy of communication while in the field as well as cameras to document poaching evidences during the patrols. Only three GRs have global positioning system out of the ten visited areas. However, only one (Lukwa-Lukwati) has a ratio of five staff to one while the other two have a ratio of 21 and 64 to one global position system.

Similarly, with exception of Selous and Kilombero whose ratio of staff to gun is one, one visited area (Simanjiro) has a ratio of two; two areas namely Moyowosi and Loliondo have a ratio of one gun to five staff while the remaining areas' the information was not provided to the auditors.

3.6 Involvement of Relevant Stakeholders in Law Enforcement

As per section 2.3 of this report, the MNRT is supposed to ensure that all stakeholders are effectively engaged in conservation, management and development of wildlife. Table 10 shows the list of key stakeholders involved directly or indirectly in fighting poaching or illegal hunting.

16. *** missing information

**Table 10: Stakeholders involvement in joint patrol with Wildlife Division**

Name of the Stakeholder	Involvement in Joint patrol operations to eradicate poaching in Game reserve
Ngorongoro Conservation Area Authority- (NCAA)	Very seldom only when operation covers areas of their jurisdiction
TANAPA ¹⁷	Every time when Joint patrol is done
LGAs	Patrol with anti-poaching team within their jurisdiction where needed
WMA	Patrol in collaboration with anti-poaching team and or LGAs patrol team
TFS	Team up with WD in Forest Reserves with wildlife resources
TISS ¹⁸	Every time when joint patrol is done
Airports Authorities eg. JNIA and KIA-	Very seldom only when operation covers areas of their jurisdiction
police and immigration	They are part of team every time when joint patrol is done
Tanzania Ports Authority	No involvement indicated
TRA (Port of exit)	No involvement indicated
Hunting Companies	Conduct patrols in their respective blocks in collaboration with LGAs and game reserves staff

Source: Wildlife Division Operation Reports

Table 10, shows the frequency and means of stakeholders involvement in joint patrol operations against illegal use of wildlife. It was noticed that 2 out of 11 identified stakeholders are not actively involved by the Ministry in the control of poaching at the ports of exist.

The Ministry has not conducted inspection at the harbor/ marine ports though the wildlife regulations stipulate the means for which trophies can be exported at the port of exit.¹⁹ However, according to wildlife division officials responsible for utilizations, trophies are not allowed to be imported or exported through marine ports or borders. This implies that trophies inspection in the major harbors by the Ministry's officials is not mandatory.

17. Participation in joint patrols with wildlife division e.g. 1. Participation in operation kipepeo in and out Selous game reserves November, 2009. Operation Okoa Tembo November, 2011

18. Tanzania Intelligence and Security Service

19. The wildlife conservation (dealing with trophies) regulation of 2010 sixth schedule



3.7 Intelligence System and Administration of Cases in the Courts of Law

Use of Informers to Supplement Intelligence Activities

The MNRT uses informers to get information to support their intelligence works. These are individuals with good faith supplying information that facilitates in arresting offenders who violate the country's wildlife laws.

According to interviews with anti-poaching officials in the four visited anti-poaching zones, about 70% of the arrested poachers resulted from information supplied by informers. Despite the relevant information to anti-poaching officials, it was found out that follow up on informers' reports was not effective.

On the other hand, anti-poaching stations have no relevant resources to make fast follow up of information received from informers. This has been the reason for ineffective implementation of informers' tips. Some of the information provided by informers were not attended to timely because of the large size of area to be covered against available staff, tools and equipment.

Centralized System for rewarding informers

The Wildlife Act of 2010, requires informers to be rewarded an amount equivalent to ten percent (10%) of the trophy caught. Payment is made to the informer when the case in the court of laws is completed and verdict is reached. It was noted that, the Ministry has not set a suitable system for allowing game reserve and ant poaching unit to allocate the budget for rewarding the informers. The process for payment is done directly from the WD head office. This process takes an average of not less than 30 days. However, there is no standard processing time provided by the Ministry. According to interviews with officials in the visited areas, delays have resulted into loss of interest and decline in providing useful information by the informers (Whistleblowers). It has been observed that in many cases, for lack of motivation and encouragement, informers withdraw from supporting the government side and join the side of poachers.

Administration of wildlife cases in the courts of law

As explained in section 3.4 of this report, the MNRT involves stakeholders such as TANAPA, NCAA, District Councils with wildlife resources, TISS and the Police Force in the patrol operations. When poachers are arrested, a case is opened in the court.

The MNRT works with the judiciary and prosecutors under Director of Public Prosecutions (DPP).



Interviews with game officers in all visited areas revealed that inadequate knowledge on wildlife issues to magistrates is among many reasons that hinder smooth administration of wildlife cases. This has resulted into issuance of light sentences to poachers.

For example, the Wildlife Act²⁰ of 2009 state that any person caught entering a wildlife reserve without permit is eligible to a fine not less than one hundred thousand shillings, but not exceeding five hundred thousand shilling or to imprisonment for not less than one year but not exceeding three years or both. However, it was found that 60 % of culprits in Moyowosi-Kigosi were fined up to TZS. 50,000/= which is far below the prescribed amount in the wildlife law. Table 11 presents the summary of reported cases in the courts that fell in the same category of low fines in the year 2012/2013 with respective punishment issued.

Table 11: Number of completed cases and their respective penalties in 2012/13

Number of suspects	Offense	Penalty given
17	Entry into the Conservation without a permit	Condemned to pay a fine of TZS.50,000/-
2	Entry into the Conservation without a permit	Were freely released on condition of omission error for six months
1	Entry into the Conservation without a permit	Defendant was sentenced to one year in jail

Source: Moyowosi-Kigosi game reserve 2012 annual report

As shown in Table 11, fines and penalties are lesser than the set penalty amount or jail term periods. In addition, these fines and penalties stipulated in the Act do not consider the environmental costs like the loss of biodiversity incurred because of unauthorized poaching as well as restoration costs. Magistrates give these fines, based on the 'Magistrate Courts Act' that empowers them to provide a minimum sentence based on appearance of defense counsel in the absence of the accused.

The Act also allows the magistrate to consider the effects that the family will suffer if the culprit receives severe punishment.

Interviews with the Game Officers in the visited areas revealed that since magistrates lack prior knowledge of the values of natural resources, they tend to inappropriately apply these clauses by ruling lesser deterring penalties to the poachers.

The Game Officers feel like being intimidated when they appear in the

20. Section 15: sub section 1 and 2



courts several times to follow-up their cases which thereafter result into less follow up. In the district courts it takes long time for cases to be completed, because district courts have no mandate to preside over economic cases without approval from the Director of Public Prosecution (DPP). In economic cases involving trophies worth less than 10 millions Tanzania shillings, the law allows the courts to grant bail to the accused. This provision gives an opportunity for the criminals to be granted bail and enough time to disappear thereafter.

Apart from the fines and penalties, issues related to improving communications with law enforcement agencies is of paramount importance. Currently the MNRT has trained 46 staff who were registered as public prosecutors to collect solid and legally admissible evidence. However, because of inadequate number of prosecutors, there are many cases in court which are not adequately attended by prosecutors from the MNRT, hence increasing the chances of such cases being ruled in disfavor of the MNRT. The analysis of the 30 available out of 46 prosecutors is as follows:

Table 12: Wildlife Public Prosecutors distribution in GRs and GCAs

GRs	Number of prosecutor allocated
Selous	8
Rungwa	0
Rukwa-Lukwati	2
Moyowosi	1
Kigosi	2
Ugalla	1
WD-headquarter	9
Anti-poaching Tabora	2
Anti-poaching Arusha	3
Anti-poaching DSM	2
Total	30

Source: MNRT, Wildlife Division



As shown in Table 12, Rungwa GR did not have prosecutors. According to interviews held with legal officers in the WD, the available prosecutors are not sufficient to cater for all areas. As a solution to this challenge, prosecutors from Manyoni Anti-poaching Unit and headquarters have been used to handle cases at Rungwa. However, the audit couldn't get analysed information on the basis used for allocating available resources, neither the suitable number of prosecutors needed in each game reserve.

On the other hand, the Ministry has not conducted training to magistrates on the Wildlife laws and Regulations and the environmental values involved in such activities. Based on the gathered information from the Head of Prosecution at MNRT, four workshops have been organized by the Ministry between 2009 and 2012. According to interviews held with MNRT officials, the training was attended by game officers. The Game Officers were trained on prosecution.



CHAPTER FOUR

MONITORING OF HUNTING ACTIVITIES

4.1. Introduction

This chapter presents findings on monitoring of hunting activities by the MNRT. Basically, the focus is on the assessment and analysis of the hunting companies by the Ministry; recording and reporting of hunting data; and system for managing hunting information.

4.2. Annual Assessment of Performance of Hunting Companies

According to the Wildlife Act of 2009, MNRT is required to carry out an annual performance assessment of all hunting companies at the end of each season. Annual assessment is conducted by using criteria stipulated below.

Wildlife population assessment and quota setting

From the interviews held with wildlife utilization officials, in order to determine the wildlife population, the Wildlife Division relies on census data from TAWIRI. According to interviews held with TAWIRI officials, census survey is required to be conducted after every three years. The collected information is used in setting hunting quota to hunting companies. This type of census is not conducted on a regular basis as required by the law due to lack of funds allocated by the ministry for the activity. Last census was conducted in dry season in 2011 in the Ruaha - Rungwa and Selous-Mikumi ecosystems. The census was based on estimating animal population of the wildlife on the entire ecosystem²¹. However, interviews with TAWIRI officials confirmed that the type of census survey conducted does not provide statistics of animals in each established hunting block.

The available data from previous aerial census done by TAWIRI is not enough to help in the wildlife population assessment and quota setting. The Wildlife Division is required to collect and analyze information gathered from the standard questionnaires on sightings, animal abundance and hunting success that are completed by wildlife and village scouts who accompany tourist hunters.

During the audit, it was noted that, data on animal abundance, hunting success, trophy quality and quota are not well collected and analyzed, the Wildlife Division cannot sustainably manage animal quotas.

21. Entire ecosystem including game reserves, game controlled areas, national parks, open areas and forest reserves



It has been therefore difficult to identify decreasing or increasing trends on trophy size or quality, quota utilization and or species abundance basing on scanty information that is poorly organized and analysed by the Wildlife Division in the MNRT.

Quality and size of trophies

Interviews held with Wildlife Division Utilization Officials revealed that trophies measurement are taken in the field where animals have were hunted and cross checked before being exported. However, review of 153 samples of trophy inspection sheets for the year 2010 and 2011 (83 and 70 respectively) provided elephants tusk measurement results as shown in Table 13 below:

Table 13: Results of elephant tusk measurement

Elephant tusks measurement	Year 2010	Year 2011
Both tusks < 18kg and <160cm (per set)	11	12
Either ≥18kg or ≥160cm (per set)	21	14
No measurement	-	3

Source: MNRT-WD-Sampled Trophy Inspection sheets for 2010 and 2011

From the trophy inspection sheets, 23 sets of tusks did not comply with the set standards of elephant tusk measurement (i.e. < 18kgs and <160cm) and only 35 tusks met weight and length measurement criteria. Also, in 2011 three sets of tusks had no measurement tags.

Other trophies apart from elephant tusks which could not meet specified measurement criteria included 16 lion's skins from three companies. The regulation specifies that lion of 6 years and above is allowed to be hunted. But the records did not indicate specifications resulting into difficulty in ascertaining the compliance. Similarly, there were 88 hippos hunted by three companies in both years 2010 and 2011. The weight of their teeth taken as trophies ranged between 2kg and 8kg.

However, it was not possible to ascertain compliance due to unavailability of the required standard for the hippos' teeth.

The Ministry's officials claimed to have penalized the companies found with substandard trophies. However, there were no records showing actions taken by the MNRT against hunting companies that came out with substandard trophies.



Quality and availability of wild animal habitats

In total 108 hunting permits (Selous (32), Kilombero (13), Ugalla (18), Moyowosi (43), and Kigosi (2)) were reviewed. Out of these only 1% was completely filled, 50% partly filled and 49% not filled at all to indicate the habitat or ecology where the animals were hunted. Interview with District Game Officers and Wildlife Officers in Arusha office confirmed that forms were not filled as required. This was due to the following reasons:

- the Game Officers/wardens/scouts accompanying tourist hunters were not knowledgeable on how to fill the forms.
- the Game Officers/wardens/scouts focus on type of animals hunted as indicated in the permit rather than considering the habitat where animals were hunted.

Consequently, animals tend to be hunted in unauthorized areas such as in water sources.

Hunting block condition

Game Officers were supposed to report monthly and quarterly to WD on the hunting blocks condition or situation e.g. migration of animals, characteristics of animal feeds, breeding areas of some animals and presence of human activities. It was found that submitted information was not assessed and used as a measure to allocated quotas for the following hunting seasons. Some of the hunting blocks were given to hunters without having adequate information on the abundance of animals marked in permit. As a result, hunting companies decided to return to MNRT before the end of the hunting term. Eight hunting blocks in game reserves and game controlled areas were returned in 2012 due to little number of animals allocated for hunting as well as deterioration in quality or loss of huntable wildlife. These are as follows:

- Simanjiro/Naberera game controlled Area
- Selous Game Reserves LU4
- Selous Game Reserves LU1
- Ugalla Niensi
- Kilombero (N) Game Controlled area-Mngeta
- Selous Game Reserve K3
- Selous Game Reserve MK1
- Selous Game Reserve R4



Hunters' utilization capacity of key animals

According to the Wildlife Tourist Hunting Regulations 2010, hunting companies are required to utilize the minimum of 40% of the key animals allocated in the block. According to interviews held with Wildlife Utilization Officials, utilization assessment is carried out every year. However, only assessment of 2009 hunting season was assessed by the audit team. This kind of assessment is general and does not provide assessment of individual animal species hunted.

In 2009 hunting season, assessment results show that, the number of hunting blocks which utilized 40% and above was 49, 11 utilized less than 40% and 7 were not utilized at all. The following reasons were provided for utilizing less than 40%:

- world financial crisis which adversely affected the hunting tourism industries
- lack of huntable animals, and
- failure to pay previous outstanding debts.

Moreover, further analysis of animals hunted was done for the three consecutive years i.e. of 2009, 2010 and 2011 as detailed in Table 14 below:

Table 14: Hunting companies performance

Year	No. of hunting companies	Number of hunting blocks	Hunting blocks with quota	Hunting blocks without quota
2009	15	28	17	11
2010	14	26	10	16
2011	13	25	25	----

Source: Wildlife Division



Similarly, the analysis of the animals hunted without quota is as shown in Table 15 below:

Table 15: Animals hunted without quota

Year	Buffalo	Crocodile	Elephant	Hippos	Leopard	Lion	Total
2009	98	8	17	18	3	4	151
2010	129	9	16	16	21	13	204
2011	2	0	9	0	0	0	11

Source: Wildlife division

In 2009, 15 hunting companies were chosen from 28 hunting blocks in selected GRs and GCAs. It was found that 17 blocks had quota allocated for hunting while 11 blocks had no quota at all though hunting was carried out. 151 animals (comprised of elephants (17), buffalo (98), crocodile (8), Hippos (18), Leopard (3) and lions (4)) were hunted without possession of hunting quota.

Similarly, in 2010, 14 hunting companies selected from 26 hunting blocks showed that 10 blocks had quota allocation while the remaining 16 blocks had none though hunting was done. 204 different species of animals were hunted without quota being allocated to hunting companies in their respective hunting blocks. These included 16 elephants, 129 Buffaloes, 9 crocodiles, 16 Hippos, 21 Leopards and 13 Lions.

Likewise, in 2011, 13 hunting companies that were selected from 25 hunting blocks revealed that all hunting blocks had quota allocated for animals to be hunted. However, 9 elephants and 2 buffaloes were hunted in excess of the allocated numbers in the quota.

4.3 Analysis of the Hunting Companies' Performance

The Wildlife Conservation (Tourist Hunting) Regulations of 2010 requires the Wildlife Division to conduct an in-depth analysis or evaluation of the performance to all hunting companies in the third year of the hunting term. This analysis is used to determine if the company is eligible for the renewal of hunting offer the following hunting term. As explained in section 4.2 of this report, 40% utilization value of the key animals is among the criteria used. Others includes revenue collected from photographic tourism, contribution to community development, contribution to improved infrastructure and protection of the environment, contribution towards ant-poaching operations and record on the export of trophies to relevant clients.

It was also noted that, the MNRT had never conducted an in-depth analysis of the hunting companies for the period of 2009-2012. The Ministry focused



mainly on checking whether the hunting companies have utilized the 40% of the value of key animals as prescribed in the regulations.

Equally, contribution for community development around game reserves from hunting companies has to be well documented. However, there were no evidences at the MNRT that reported on the extent of the hunting companies' performance and their contributions to the community development as well as support to environmental protection.

According to the regulations, hunting companies were required to contribute 5000 USD every year to the implementation of community development projects in the neighbouring communities. Nevertheless, no hunting company has remitted such an amount during the interim period²². Due to lack of close follow up, the Ministry has not done analysis on revenue collected from photographic tourism, the contribution to community development, protection of environment and record on the export of trophies to the relevant clients. Usually during this time, communities around could not realize benefits of wildlife resources around them. Lack of the realization of this benefit to inhabitants surrounded with wildlife increases the risk of illegal activities in the GRs and GCAs.

Table 16: Hunting companies' contribution to community development and ant-poaching

GCAs/GRs	contribution by hunting companies/Photo-graphic tourism in the interim period	
	Community develop-ment ²³ (Estimates)	Support to Anti-poaching
Rungwa	4 ²⁴	Fuels for patrol
Moyowosi	No contribution	Conduct patrols
Ugala	No contribution	Conduct patrols
Selous ²⁵	No contribution	Conduct patrols
Loliondo	954,707,200.00	One car for patrol
Simanjiro	Not established	Conduct patrols
Kilombero	No contribution	Conduct patrols
Lake Natron-longido	Not established	Conduct patrols

Source: Respective GRs and GCAs

22. Usually the concession period for hunting was five which ended in 2009. In 2009 the Ministry did not issue new concessions to the hunting companies as expected. Instead, the contracts that existed then were extended for 3 years (2009 to 2012) before advertising new concessions. The 3 year period is referred to as interim period.

23. Construction of schools, police station, teacher's houses, dispensaries, solar energy project, boreholes etc

24. 2 schools dormitories, 1 dispensary and 1 borehole

25. 6 out of 19 hunting companies contribute to ant poaching



Table 16 shows no contribution to community development was made during the interim period in Ugala, Selous, Moyowosi and Kilombero. In Loliondo and Rungwa there were established contributions to community development from the tourist/photographic companies. Simanjiro and Lake Natron contribution to community development were not established. This was due to the fact that contributions were made directly to village governments. All visited GR and GCAs received ant-poaching contributions from hunting companies in their respective blocks. Selous Game Reserve had 19 hunting companies of which only 6 hunting companies were involved in ant-poaching. According to interviews held with WD officials, absence of such key information in the WD hinders the Ministry to conduct an in-depth analysis of the hunting companies.

4.4 Recording and Reporting of Hunting Data

The MNRT requires the hunting companies to record and report on all relevant details of all animals killed, wounded, or captured by hunters and the habitat including where the animals were killed. A total of 108 hunting permits were reviewed to assess whether all key information was reported. It was found out that 49% of all hunting reports submitted to the Ministry lacked key information about ecology, the location where the animals were hunted and distribution of the animals in the particular area.

It was further realized that the Ministry has few skilled staff to collect data for scientific purposes. Lack of scientific information affect the decision making process during block allocation because the information should give clear picture of the animal species habitat and ecological condition of the block.

4.5 System for Managing Hunting Information

The Research and Training Wing of the WD is responsible for compiling the statistics from user departments, respective game reserves and Local Governments on the database. It is also responsible for the generation and dissemination of information. Similarly, trophy measurements are required to be analyzed so as to establish the trends and ascertain if there are changes that reflect animal population changes.

The audit noted that there were separate databases for problem animals²⁶ and for elephant tusks. It was further, observed that during 2009-2011 hunting season, neither data related to problem animals nor elephant tusks was in place. Likewise, the ministry has not established proper system for managing information collected from hunting safari. This has resulted into the Ministry operating without information on wildlife population trends from each hunting block.

²⁶. Problem animals refers those animals invade and/or destroy home settlement or farms



For example, information such as trophy size is not readily available in the Ministry database. Document review showed decreasing trend of weight of elephant tusks hunted. This led to the changes in the legislation regarding the acceptable size of trophies for hunting from 25kg in the previous regulations to 18kg in the 2010 regulation. Consequently, there is high possibility of progressive decrease in elephant tusk measurements due to decreasing trend contributed mainly by poaching.



CHAPTER FIVE

REVENUE COLLECTION AND DISTRIBUTION

5.1 Introduction

This chapter presents findings on assessment as to whether MNRT has in place controls to ensure that potential revenue from wildlife hunting is properly projected, collected and likewise, distribution of generated revenue is appropriately done.

5.2 Revenue Projections

According to guidelines for the preparation of medium term plan and budget of the MoF, the MNRT is required to ensure current sources of tax, non-tax and potentials are explored. Likewise, strategies for the collection of these revenues have to be persuasive and realistic projections submitted to Treasury.

The MNRT has identified potential sources of revenue from wildlife resources which mainly includes tourist hunting and photographic tourism.

In tourist hunting, animal hunting quota was a basis for setting up potential revenue that can be collected. The animal hunting quotas were supposed to be established by each hunting block. In total, there were 133 hunting blocks during the period of this audit.

Interviews with TAWIRI and Ministry Officials revealed that, establishment of the hunting blocks lack detailed scientific data on the number of animals' estimates in each block. Estimation is rather generalized on population of the whole ecosystem. In projecting revenues, it was also noted that, there was no revenue data to be used as base to establish the value of the respective blocks. Revenue projections were made by calculating the quota granted to the hunting blocks multiplying by the price set for each animal.

Estimation of revenue is not based on scientific statistics. Projection of revenue is usually based on other reasons including previous performance of a given hunting block. The estimate of next financial year is usually determined using performance of the previous year.

The Ministry also evaluates all sources of revenue such as the trophy dealer licenses, certificates of ownership, game licenses, hunting licenses, trophy



export licenses, and capture permits.

Other areas include receipts from compound fees, receipts from game viewing ivory, trophies and hippo teeth, rent- telecommunication tower and miscellaneous receipts. Based on the mentioned sources, the revenue estimate and its collection for three years is shown in the Table 17.

Table 17: Projected Revenues from different sources

Financial year	Total Projected revenue (billions TZS) ²⁷	Total Actual revenue (billions TZS)	Percentage of revenue collected
2009/10	33.7	30.5	90.5
2010/11	46.3	34.2	74
2011/12	40.8	28.1	69

Source: MNRT: Accounts-Statement of revenue as at June 2011 and 2012

The table 17 above suggests that performance of revenue collection is below projected figures by 10% to 45%.

Analysis based on the sources of revenue data from MNRT used during the interim period of hunting season 2009 to 2012 shows that estimated revenue was approximately TZS. 75.85 billion. When this is compared with the Ministry's projections, it gives an implication that revenues projected by the Ministry were not realistic. This situation was explained by the Ministry's officials as arising due to:

- Weak and unreliable data used for projections of revenue; and
- Weak capacity of the Ministry in collecting and analyzing data

5.3 Controls In Revenue Collection

Besides setting targets to increase revenues accrued from wildlife resources, the MNRT had established controls for revenue collection from the tourist hunting, term of ownership, use of hunting permits and issuing of invoice. According to interviews held with the Ministry's Official responsible for revenue and utilization, the issuance of invoice worked well with tourist hunting but not with photographic tourism.

²⁷. Projected and actual collection from permanent secretary and TWPF



Control for revenue collection from photographic tourism

It was found out that, in photographic tourism, payments for the photographic tourism were done when the customer had finished the tour. The Ministry provides a government bill to the client and it depends with the goodwill of the company to report to wildlife officials the activities done in the field. Based on the photographic hunting reports reviewed from MNRT Arusha office, 36 companies did not pay the government bills for photographic tourism on time. This was because of insufficient follow up made to collect the generated revenue, consequently the Ministry lost a total of USD 1,697,318.69, equivalent to TZS. 2.7 billion as at 11/12/2012.

Projected revenue from photographic tourism

MNRT projected revenue from the photographic tourism for Selous game reserves. The projection did not include other game reserves and game controlled areas. In three years consecutively SGR exceeded the target in collection of revenue from photographic tourism (see table 18).

However, this was not the case to other game reserves and game controlled areas where by MNRT experienced revenue loss from photographic tourism amounted to TZS. 2.7 billion as at 11/12/2012. According to interviews held with the Ministry Officials, this was due to lack of proper infrastructure in place to manage the photographic tourism. Photographic tourism is still new to the office and the MNRT is still putting new infrastructure including building staff capacity to manage this kind of tourism in order to maximize its potential revenue source.

Table 18: Projected and actual revenue collection from photographic tourism in Selous game reserves

Year	Projected Revenue (Million TZS)	Actual Revenue Collected (Million TZS)
2008/09	893	2,215
2010/11	937	2,403
2011/12	1,127	3,561
Total	2,957	8,079

Source: MNRT statement of revenue for the year ended 30th June, 2009, 2010, 2011 and 2012



5.4 Distribution of Generated Revenue to Parties

During the audit, it was difficult to ascertain distribution of revenue especially the amount of money sent to Treasury, Wildlife Division and the retention at TWPF. Though the distribution has been done, documentation of the disbursement was not properly documented for the period of 2009 to 2012. The Ministry cannot establish whether the percentage of distribution was met or not.

However, based on interviews with MNRT officials in the account section, the distribution is done arbitrary based on discussion and needs, and does not follow the established distribution order. This is because of the government budget constraints and lack of set priorities in protecting wildlife efforts. However, the Wildlife Division gets additional funds from TWPF to protect wildlife resources in the country as explained under section 2.6 of this report.

5.5 Utilization of the Distributed Funds

LGAs received 25% of total revenue from tourist hunting

From the interview with wildlife officials responsible for revenue, LGAs with wildlife and who exercise the tourist hunting, received 25% of the revenue generated. Table 19 gives the amount of money sent to LGAs in financial years of 2009/10 to 2010/12.

Table 19: Funds allocated to LGAs as 25% in financial year 2009-2012

Year	Money transferred to LGAs with hunting blocks in (billion TZS)	Number of LGAs
2009/2010	1.5	42
2010/2011	0.9	44
2011/2012	1.4	38
Total	3.8	

Source: MNRT -Accounting section

As shown in Table 19, the Ministry spent about 3.8 billion TZS as money transferred to LGAs with hunting blocks in the years 2009 to 2012. On average 40 LGAs received these funds from the MNRT.

On the other hand, MNRT requires LGAs to present action plans and report on how the funds were used. From the interview with the Ministry Officials, no LGA has presented report to the MNRT about expenditure of the 25% or action plan for use of the 25% contribution which they receive from MNRT.



According to interviews held with Districts Game Officers (DGOs) of Loliondo, Longido, Simanjiro and Kilombero, 40% of the 25% funds that LGAs received from MNRT was not allocated to fulfill obligation of wildlife protection activities as the primary purpose, see Table 20.

Table 20: Money received (million Tsh) and percentage for wildlife management in selected LGAs

Year	KILOMBERO		LONGIDO		SIMANJIRO		LOLIONDO	
	Amount received (million Tshs)	Amount used for Wildlife activities	Amount received ¹³ (million Tshs)	Amount used for Wildlife activities	Amount received ¹⁴ (million Tshs)	Amount used for Wildlife activities	Amount received ¹⁵ (million Tshs)	Amount used for Wildlife activities
2010	56.36	12.02%	57.84	0.00%	86.24	23.47%	87.99	8.45%
2011	37.33	12.03%	54.53	0.00%	60.27	23.99%	69.09	13.82%
2012	44.99	15.58%	59.72	9.11%	72.36	98.79%	82.89	27.20%

Source: MNRT amount allocated to LGAs and LGAs' implementation reports

It is apparently that, Longido allocated only 9.11% in 2011/12 for conservation of wildlife resources. Simanjiro allocated 23.47% (2009/10) and 23.69% (2010/11) and 98.79 (2011/12) and Loliondo 8.45%, 13.83% and 27.20% in 2009/10, 2010/11 and 2011/12 respectively as indicated in Table 20 above. Moreover, Longido, Simanjiro and Loliondo generated the sum of Tanzania shillings 42.78 Million, 39.52 Million and 513.53 Million respectively from photographic tourism, resident hunting and contribution from tourist companies as analysed in Table 21.

Table 21: Amount generated apart from 25% provided by the MNRT

Year	LONGIDO	SIMANJIRO	LOLIONDO
	Amount generated in TZS from photographic tourism	Amount generated in TZS from photographic tourism and resident hunting	Contribution from tourist hunting and photographic companies (TZS)
2010	6,000,000.00	10,500,000.00	188,646,963.00
2011	9,182,436.37	10,590,695.60	153,468,494.00
2012	27,596,716.00	18,425,911.00	171,415,740.00
Total	42,779,152.37	39,516,606.60	513,531,197.00

Source: LGAs' Annual implementation reports

The following were reasons provided on why funds were not spent as per primary purpose:

- The funds are sent directly to the district account (consolidated or pool account) administered by the DED where by allocation of



funds to finance district activities depends on the priority of DED.

- Lack of action taken by the Ministry when districts have not provided report of the expenditure. Consequently, lack of information on the use of funds makes it difficult for the Ministry to evaluate the effectiveness of the performance of the 25% allocation.



CHAPTER SIX

CONCLUSION

This chapter presents overall and specific audit conclusions based on audit objectives and findings as explained in the previous chapters.

6.1 General Conclusion

The MNRT does not fully ensure that the wildlife law is effectively enforced to minimise illegal use of wildlife animals. This was contributed by allocation of resources without strategically focusing on the identified hotspots for ant-poaching; Not all stakeholders were fully involved in the law enforcement; Inadequate monitoring of hunting activities; and complexity in the proportional distribution of collected revenue to parties.

6.2 Specific Conclusions

6.2.1 Wildlife Conservation Law Enforcement

Poaching in hotspot areas is ineffectively managed. Patrols are not sufficiently conducted in areas known to be of high poaching risk. Resources such as financial, human resource, patrol tools and equipment are not sufficient while at the same time they are not efficiently allocated based on the workload. This is caused by lack of analysis conducted to help in setting patrol plans and strategies, inspection priorities to be used as basis for allocation of resources for patrol and inspections. Formal data analysis was not carried out due to insufficient information. Since poaching information not formally analyzed to get the true picture of poaching in various areas the WD cannot effectively set strategic patrols activities.

The WD was expected to give more priority to patrol areas that were most severely affected by poaching activities, but on the contrary such areas were less patrolled. Lack of demand driven prioritization of ant-poaching effort has given an opportunity to the poachers to continue killing elephants without appropriate measures being taken by the government.

The MNRT has not taken enough measure to strengthen patrol during rainy season though it is known that this is the time when high rates of poaching incidences take place. Throughout this period, patrol teams put more efforts outside poaching areas.

However, these kinds of patrol do not promote sustainable hunting because



even if trophy and poachers are caught outside game reserves, damage would have been done in the game reserves. Strategic anti-poaching and surveillance work is required to be carried out all year round targeting areas of animal concentration including dispersal areas and migratory routes plus watering points and any other preferred areas where animal concentration occurs.

Conducted patrols are not sufficiently evaluated by the higher authorities. Patrol teams lack documented guidelines to follow when planning patrols that could be also used as a basis for evaluating their performance. Large parts of the game reserves are not covered during patrol thereby exposing it to poachers. Similarly, collected data resulting from patrol were not scientifically analyzed to assess trends in poaching and the strategies used in particular areas to determine the effectiveness of law enforcement efforts.

Ant-poaching activities are not timely financed by MNRT. Mechanism for rewarding informers is not working well. Informers are not paid timely after completion of cases. To some extent delay in funding resulted into reduced morale in staff and potential informers thereby increased likelihood for them to collude with culprits, and leakage of intelligence information. In addition, fines and penalties are too low to prompt compliance. Penalties do not adequately consider environmental costs.

6.2.2 Monitoring of Hunting Activities

The MNRT lacks proactive monitoring system to detect illegal off-take to ensure planned utilization of allowable hunting quotas is available for use. Wildlife hunting is insufficiently monitored by the MNRT. Allocation of hunting blocks is not based on the previous assessment of the blocks or companies to be offered. Animals are hunted without allocated quota. This is because wildlife hunting information is not collected and analysed timely and used as a basis for improving management of hunting activities.

MNRT has not adequately managed information collected from hunting safari due to absence of established system for managing information²⁸ collected from hunting safari. As a result the ministry has been operating without important information on wildlife population trends from each hunting block for use in decision making during quota allocation when census survey data are missing.

28. Information on hunting permit number, start and ending dates, species killed, wounded, location, trophy sizes and signs of poaching activities



Assessment of individual indicators set for hunting performance of various hunting companies is not adequately conducted. Hunting companies' performances are rarely assessed to determine utilization capacity. Hence there is a risk of decreasing in population of a certain species without awareness of the WD.

Though the law requires involvement of other stakeholders in the ant-poaching activities, their involvement if any is not sufficiently coordinated to determine the extent of their contributions.

6.2.3 Revenue collection and distribution

There is weak control over management of revenue generated from wildlife hunting. The MNRT has not adequately put control to ensure that potential revenue from wildlife hunting is efficiently projected and collected. This is because hunting blocks are not scientifically established to determine their values. Estimates of revenues are based on performance of revenue collected from previous years which is not the best way to make projections of expected revenues.

Distribution of funds does not consider workload (size of the area and associated risks of poaching). It is difficult to determine amounts received or to be received by the GRs and GCAs. This is due to complexity of the revenue distribution model in use. The MNRT has failed to establish the proportional amount received by each beneficiary as per proportional set from each source of revenue established.

The failure was due to the complex nature of the proportional set. What is known is the global figure of revenue collected by the Permanent Secretary (Treasury), TWPF, Selous game reserve and LGAs that exercises tourist hunting and photographic tourism. Funds sent to MNRT are not fully spent on intended primary purpose of wildlife protection as none or less than 40% of the 25% funds is used for the purpose of enhancing wildlife protection.



CHAPTER SEVEN

RECOMMENDATION

7.1 Introduction

The audit findings and conclusions point out weaknesses in the management of wildlife hunting in game reserves and game controlled areas. Wildlife law is not efficiently enforced to contribute in the fight against poaching. There are also weaknesses in monitoring of hunting activities and management of revenue collected from hunting activities.

This chapter contains recommendations to the Ministry of Natural Resources and Tourism (MNRT) Wildlife Division (DW), regarding the weaknesses pointed out in the previous chapters. The audit office believes that implementation of these recommendations would bring about improvement on how MNRT manages hunting activities hence ensuring that the 3E's of Economy, Efficiency and Effectiveness are achieved in the use of public resources.

7.2 Wildlife Law Enforcement

The Ministry of Natural Resources and Tourism should ensure that:

- risk analysis is carried out to enable realistic setting of target and allocation of resources.
- appropriate strategies are set to fight against poaching during rainy seasons.
- necessary equipment is available and properly maintained in game reserves and in ant-poaching zones.
- analysis of key stakeholders is carried out and actively involve them in combating poaching and fighting export of illegal trophies.
- they collaborate with the Judiciary to ensure that the penalties given by magistrates are high enough to bring about the intended deterrent effect.
- game scouts posts are strategically placed in areas of high animal concentrations to facilitate vigilance and action when necessary.



7.3 Monitoring of Hunting Activities

The Ministry of Natural Resources and Tourism should ensure:

- trophy and habitat quality assessment is carried out
- annual payment by hunting companies of USD 5,000 is reviewed to save the intended purpose.
- proper management of hunting and ant-poaching data collected, and should be properly documented, analyzed and used in planning and decision making.
- development and use of a datasheet/form to be filled by game warden/officers and village scouts, who accompany hunting clients.
- proper coordination of the stakeholders' contribution to ant-poaching and their contribution to community development.
- game officers/wardens/scouts are trained to properly fill the permit.

7.4 Revenue Collection and Distribution

The Ministry of Natural Resources and Tourism should ensure:

- assessment on revenues from wildlife is done to benchmark the basis for revenue estimation
- there is established system for collecting timely revenue from photographic tourism
- controls set for revenue collection are reviewed and properly followed.
- distribution of funds is governed by the appropriate model that considers workload and risks
- timely enquiry from LGAs with wildlife resources to account for resources used in intervention activities conducted to protect wildlife resources within their jurisdictions
- collaboration with PMO-RALG to ensure that LGAs use the resources allocated for protective activities as directed.



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APPENDICES



Appendix 1: Audit Questions

Audit question 1:	To what extent does the MNRT ensures wildlife hunting regulations is effectively enforced to prevent illegal use of animals?
Sub - question 1.1	Does the MNRT enforce the wildlife law in game reserves and game controlled areas?
Sub - question 1.2	Does the MNRT allocate resources for ant-poaching efficiently?
Sub - question 1.3	Does the MNRT involve relevant stakeholders in law enforcement? How are they involved?
Sub - question 1.4	Does the MNRT have an intelligence system and in use to protect wildlife?
Audit question 2:	Does the MNRT efficiently monitor wildlife hunting in game reserves and game controlled areas?
Sub - question 2.1	Does the MNRT conduct an assessment and analysis of the performance of all hunting companies?
Sub - question 2.2	Do the hunting companies record and report relevant data as required?
Sub - question 2.3	Are the hunting data reported to the MNRT headquarters and on a timely basis?
Sub - question 2.4	Does the MNRT have a system for managing the hunting information?
Sub - question 2.5	Does the MNRT use the information in its decision making?
Audit question 3:	Is the revenue from wildlife hunting properly collected, managed and allocated by the MNRT to the required LGAs?
Sub - question 3.1	Is the revenue generated distributed to all parties as stated in regulations?
Sub - question 3.2	Does the MNRT ensure that distributed fund utilized for the planned activities?



Appendix 2: Methods Used to Conduct the Audit

Various methods were used in order to get a comprehensive, relevant and reliable picture of the activities concerning management of wildlife hunting specifically to prevent illegal use of animals.

To obtain understanding of the mandate of Ministry of Natural Resources and Tourism and the legal framework for the management of wildlife hunting operations, the audit reviewed ministry's Strategic Plan for the year 2010 - 2013; sector policies such as National Tourism Policy and Tanzania Wildlife Policy of the United Republic of Tanzania (URT); URT Wildlife Conservation Act, 2009; URT Wildlife Conservation Regulation.

Other reviewed documents related to monitoring of hunting activities and law enforcement, including annual performance assessment reports, evaluation reports, hunting reports, patrol and operation reports, permits records, financial reports, and other related documents reviewed. The documents were reviewed in order to get reliable secondary data and information regarding law enforcement, monitoring and revenue collection and distribution.

To gain understanding of the management of wildlife hunting operations interviews with wildlife officials responsible for wildlife utilization, anti-poaching, in the ten visited GRs and GCAs were conducted.

To reconfirm data collected through documentary review and interviews, six Game Reserves, four Game Controlled Areas and three anti-poaching zones were visited.



Appendix 3: Performance of Patrol in Poaching Hotspot Areas (Experience Based) In Five GRs and GCAs

GRs/GCAs	Areas with High risks of Poaching	Kind of Poaching	Frequency of Patrol (Rainy season) December-April	Frequency of Patrol (Dry season) June - December
Selous		Elephants tusks	Seldom	20 days each month
Rungwa	<ul style="list-style-type: none"> • Linge • Muhesi • Inyonga river • Mfunike • Kizigo central • Mpera itunda 	Elephants tusks	Seldom	10-15 days each month
Rukwa-Lukwati	• Chamsima	Elephants tusks	Seldom	10-15 days each month
	• Mlele Kalovya (Lukima)	Elephants and Illegal timber logging		
	• Coastal of Lake Lukwa	Cattle Invasion, Killing of Hippopotamus and Buffalo for meat		
Moyowosi	<ul style="list-style-type: none"> • Along Malagarasi river • Mweho Kigosi Kusini • Chumbani • America • Jerusalem 	Cattle Invasion, Elephants tusks, illegal fishing	Seldom	10-15 days each month
Ugala	• .	Elephants tusks	Seldom	Frequently
Longido-Lake Natron	• No specific area identified	Bush meat	Seldom	10 days every month
Simanjiro	<ul style="list-style-type: none"> • Simanjiro - Kiteto border • Simanjiro - Mererani border 	Elephant tusks and bush meat subsistence	Seldom	Twice a month for five days
Loliondo	• No specific area identified	Elephant tusks and bush meat subsistence	Seldom	10 days every month
Kilombero	<ul style="list-style-type: none"> • Mngeta Merera • Mngeta open area, • Kihansi open area • Mlimba ngalimila • North Mlimba 	<ul style="list-style-type: none"> • Livestock keeping and encroachment • Elephant tusks • bush meat 	No patrol	Once in every three months

Source: Respective GRs and GCA



Appendix 4: Use of human resources in the GRs and GCA for patrol activities

Location	Size of GR/GCA (km ²)				
		Re-quired number of staff	Number of staff available	Staff defi-ciency (in % age)	Size of GR patrolled by staff (km ²)
Selous GR	50,000	2000	313	84.7	160
Rungwa GR	17,000	680	64	89.6	266
Moyowosi/ Kigosi GR	21,060	842	64	96.4	329
Ugalla GR	5000	200	31	84.5	161
Lukwa -Lukwati GR	9,569	383	42	89.1	228
Longido-Lake Natron GCA	3000	120	47	59.9	64
Simanjiro GR	4280	171	12	93	356
Loliondo GCA	4000	160	10	93.8	400
Kilombero GCA	3607.2	144	14	92.3	258

Source: Respective GRs and GCAs

Appendix 5: Projected Revenues for Interim Hunting Seasons

FEES	Variables	USD	Total USD	TOTAL TSH (At the rate of 1400)
Block fees per hunting season	133	27,000	3,591,000	
Quota utilization	9065	5,386	48,824,090	
Trophy handling fee				
10 days safari package	425.5	400	170,200	
More than 10 days safari package	425.5	500	212,750	
Hunting permit				
10 days safari package	425.5	950	404,225	
More than 10 days safari package	425.5	1250	531,875	
Conservation fees				
hunting client per day	857	150	128,550	
Observer per day	222	100	22,200	
Professional hunters examination fee*	85	500	42,500	
Professional hunters license fee	85	3000	255,000	
Total			54,182,390	75,855,346,000.00

Source: MNRT (WD) February 2012: Safari hunting in Tanzania.



Appendix 6: Individual Game Reserves: Surveillance Coverage Achievement Versus Funds Allocated

Game reserves	Financial year	Actual amount (expenditure) (TZS)	Area Covered (km ²)	Percentage of area covered during patrol	Percentage of uncovered area
Ugalla (5000 sq km)	2009/10	120,600,000	376.9	7.5	92.5
	2010/11	107,500,000	335	6.7	93.3
	2011/12	196,117,000	612	12.3	87.7
Moyowosi/ Kigosi (21,060 sq km)	2009/10	-	-	-	-
	2010/11	245,690,000	767.7	4.0	96
	2011/12	310,588,000	970.6	5.0	95
Rungwa (17,000 sq km)	2009/10	157,466,128	492	3	97
	2010/11	251,017,200	784	5	95
	2011/12	407,146,544	1272.3	7.5	92.5
Selous ²¹ (50,000 sq km)	2009/10	1,859,802,845	5811.9	11.6	88.4
	2010/11	2,025,847,277	6330.8	12.7	87.3
	2011/12	3,194,427,705	9982.6	20.0	80

Source: Respective GRs



Appendix 7: List of Recommendations and Responses From Ministry of Natural Resources and Tourism

S/N	Recommendations	Comments	Action taken
1	Wildlife enforcement		
1.1	Risk analysis is carried out to enable realistic setting of target and allocation of resources	The Ministry is continuing collecting data on areas that are prone to poaching, type and means of poaching and do analysis accordingly.	Ministry has established a data management unit and training personnel for data collection, management and processing for management and informed decision making
1.2	Appropriate strategies are set fight against poaching during rainy season	The Ministry is frequent carrying out anti-poaching patrols. However the effectiveness of patrols during rainy season compromised by inadequate infrastructure including water-shade roads.	Ministry is carrying needs assessment for water-shade roads in Protected Areas. With availability of resources the Ministry will continue to improve infrastructure in Game Reserves for effective anti-poaching patrols
1.3	Necessary equipment are available and properly maintained in GRs and Anti-poaching zones	Equipment is essential for effective management of Protected Areas (PA). Therefore all equipment are proper managed/maintained. However there are some equipment that need major repairs.	Depending on needs assessment and availability of financial resources, the Ministry will continue procuring the necessary equipment and do proper maintenance
1.4	Analysis of key stakeholders is carried out and actively involve them in combating poaching and fighting export of illegal trophies	Ministry is collaborating with other stakeholders with other stakeholder in combating poaching and illegal export of trophies (Harbours, TRA, Police, JWTZ, Airport Authority etc)	The Ministry will continue to look on other areas in order to strengthen collaborations with other stakeholders



S/N	Recommendations	Comments	Action taken
1.5	Rates of fines and penalties are reviewed to facilitate the intended deterrent effect	The current WCA penalties for offenders are deterrent enough. However, judges sometimes are not giving penalties according to WCA	
1.6	Game scouts posts are strategically places in areas of higher animal concentrations to facilitate vigilance and action when necessary.	Game posts are established in order to reducing running costs of sending game scouts long distances from PA headquarters. Therefore not necessarily to have game post where there is animal concentration. Further, animals move to availability of food and seasonal changes.	
2	Monitoring of hunting activities		
2.1	Trophy and habitat quality assessment is carried out.	TAWIRI has been assessing habitat of PA and other wildlife areas throughout.	There are designed forms to facilitate trophy and habitat quality assessment (See attachment). Collection of information will commence in July 2014.
2.2	Annual payment by hunting companies of USD 5,000 is reviewed to save intended purpose	The Ministry will consult tourist hunting industry stakeholders and discuss the issue	
2.3	Proper management of hunting and anti-poaching data collected, and should be properly documented, analyzed and used in planning and decision making		Ministry has established a data management unit and training personnel for data collection, management and informed decision making



S/N	Recommendations	Comments	Action taken
2.4	Development and use of the datasheet/ form to be filled by game warden/officers and village scouts, who accompany hunting clients and in use		Ministry has established a data management unit and training personnel for data collection, management and processing for management and informant decision making
2.5	Proper coordination of the stakeholders' contribution to anti-poaching and their contribution to community development	Ministry is collaborating with other stakeholder in combating poaching and illegal export of trophies (Harbours, TRA, Police, JWTZ, Airport Authority etc)	The Ministry will continue to look on other areas in order to strengthen collaboration with other stakeholders
2.6	Game Officers/ wardens/Scouts are trained to properly fill the permit	Noted	The Ministry will do training need assessment and do the needful to improve the filling of hunting permit and other relevant forms.
3.	Revenue collection and contribution		
3.1	Assessment on revenues from wildlife is done to benchmark the basis for revenue estimation.	Revenue estimation has been based on the quota allocation for hunting tourism and trend analysis for photographic tourism	Revenue estimation has been based on the real information and date from the source/ station. Currently revenue estimation is done at collection station level and seasonality has also been considered.



S/N	Recommendations	Comments	Action taken
3.2	There is established system for collecting timely revenue from photographic tourism	OK	The Ministry has developed Photographic Tourism Management System which stated in July, 2013. This system ensures any entry and activity permit are paid for before are issued.
3.3	Controls set for revenue collection are reviewed and properly followed	Revenue collection has been according to Public Finance Act 2001 (Revised 2004) and Treasury Circulars issued from time to time.	To ensure control and adherence to Public Finance Act and Treasury Circulars the Ministry has development computerized revenue monitoring and collection system i tourism Management system which stated in July, 2013.
3.4	Distribution of funds is governed by the appropriate model that considers workload and risks		The Ministry is in the last process of forming Tanzania Wildlife Authority (TAWA) in which this issue will be taken care.
3.5	Timely enquiry from LGAs with wildlife resources to account for resources in intervention activities conducted to protect wildlife resources within their jurisdictions.		The Ministry has wrote a letter to LGAs to remind them to comply with the requirements of the regulation.

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