

Testimony of Arturo Tomas “Tom” Benavides

Representing Dallas Safari Club

Before the

House Natural Resources Committee

Subcommittee on Oversight

Oversight Hearing on America First: US Leadership and National Security in International Conservation

January 21st, 2026

Chairman Gosar, Ranking Member Dexter and members of the Committee, thank you for the opportunity to testify. I am Tom Benavides, an assistant vice president for the Board of Directors of Dallas Safari Club. I, along with my family, have been ranching cattle in Texas for generations. My father and mother engrained in me the value of being a good steward and manager of our habitat for livestock and wildlife.

I have been very lucky in life to experience many wild places on this planet which led me to my love for the rhinoceros. My wife and I have dedicated much of our life to establishing and maintaining a viable private breeding program of southern white rhino here in the US in the hope that we can help save the species and someday perhaps my children can be part of repopulating rhino in its native habitat. Further, my rhinos are wild and treated as wild animals so that they can thrive in an environment nearly identical to their native homes (minus the poachers). If we as a country and international community continue with the status quo, rhino will soon be extinct off the African continent.

Dallas Safari Club

DSC and our separate charitable arm, Dallas Safari Club Foundation (DSCF), are US-based conservation organizations that work with Wildlife Ministries and Departments worldwide to promote science-based wildlife management and conservation programs. DSC and DSCF award millions of dollars in annual conservation grants to support wildlife research, habitat management, anti-poaching programs and reduce human-wildlife conflict abroad. Domestically, we have funded projects to support state wildlife agencies’ conservation initiatives, including bighorn sheep, mule deer, pronghorn, habitat restoration and connectivity, and water development. Additionally, we have supported many programs to educate and inform youth and the public on wildlife conservation principles and needs.

Dallas Safari Club’s mission is to ensure the conservation of wildlife through public engagement, education and advocacy for well-regulated hunting and sustainable use. Our vision is a society that values wildlife, engages in its conservation and understands and supports the role of well-regulated hunting in the sustainable use of wild resources. DSC is a member of the

International Union for Conservation of Nature (IUCN), and we participate in the Convention on International Trade in Endangered Species of Flora and Fauna (CITES).

Hunting & Wildlife Conservation

In the US and abroad, where wildlife is valued, it thrives—this is true of North America and the North American Model of Wildlife Conservation and it's true of many Southern African countries. In Africa, where there is legal, regulated hunting, wildlife is abundant. Americans have forgotten what it was like over a century ago when wildlife was a threat to them and their families. But in many parts of the world, wildlife is viewed as a threat, nuisance and/or source of protein—and nothing more. The perfect example of this is the recent raids in the news by elephants in Africa. Imagine having your home or crop (that is your only source of livelihood) destroyed overnight by an elephant; or having a lion or leopard attack your children and your livestock. The result, sadly, is that wildlife is often snared, poisoned or killed in some way. However, where hunting concessions exist in Africa, actions are taken to protect the people that live with wildlife and they, in turn, protect the wildlife.

Importantly, regulated hunting means that there are limits on the time, type, age, sex, and much more of the species harvested and that there are wildlife management plans and other safeguards in place to ensure that the hunting of the species benefits the species overall. Non-hunters may ask why we as hunters, who harvest wildlife, spend so much money trying to save it. For those of you who have not hunted, it is an experience like no other. Social media, artificial intelligence or any other human-made devices cannot replace Mother Nature and the incredible experience of being one with the earth. After all, humans were, not too long ago in our history, hunters.

Rhinoceros

The private sector has been very successful at conserving, managing and bringing back species such as southern white rhinoceros. Again, wildlife must have value to survive. As a private owner of white rhino, I place great value on those animals and have spent a great deal of time and money on the survival of the species. As such, we have developed the best possible program for rhinoceros to thrive, and I am constantly looking for ways to improve.

When I started this endeavor, I reviewed a great deal of information on how best to care for rhinoceros, and I worked with multiple veterinarians and experts. A rhino's closest relative is a modern horse, and it shares about 98% commonality of diet. As a rancher, I know how to sustainably manage a breeding program in conjunction with dietary needs. The browse, graze and mineral content of soil in southern Texas is a close match to southern Africa. In essence, I have an ideal location for a breeding program for white rhino.

While I applaud the hard work being done by American zoos and other NGO's, their strategy differs from that of private breeders. A zoo's main purpose is to exhibit, educate and inform the public, to raise awareness about the current plight of endangered species like the rhino. My purpose is to enhance the survival of the species by actually producing more rhinos. I'm not trying to sell tickets to see rhinos—I'm trying to increase the world's population of rhinos. I would argue that my job might be easier than educating people! While selling tickets to

see rhinos and fundraising for programs can raise awareness, it does not result in a single new rhino. To successfully propagate rhinos, we must move out of traditional NGO tactics and encourage programs like ours. When developing a model for management, I looked at the two countries doing the best job, by far, at conserving rhinos. South Africa and Namibia have many successful private breeding programs. Conservation isn't difficult; it's simple. Conservation requires common sense and examining how rhinos thrive in the wild.

I would be remiss if I did not mention rhinoceros conservation comes with its own threats as well. To understand this, I ask you to suspend your American view of the world and instead think about continents like Africa where many people still struggle daily to get enough food and water to live—let alone modern healthcare, housing and a job that will support a family.

The horn of the rhino is worth roughly \$20,000 to \$100,000 per kilogram of horn on the black market in Asia. Owning or managing several of them puts you at great risk, especially in Africa, but also in the US. Many breeders and their families are threatened with everything from kidnapping to death. The smuggling of rhino horn is conducted by the most heinous crime networks on the planet – many of these crime syndicates are also drug traffickers. Game wardens protecting rhino in Africa often have two choices: torture and death if they protect rhinos; or give poachers information and receive hefty monetary compensation. If you are struggling to feed your family, this isn't a difficult choice.

To prevent the poaching of rhino, some have removed part of the horn to dissuade poachers from killing the entire animal for its horn. Rhino horn can be ethically harvested from rhinoceros with no danger to the animal. It includes sedating the rhino and removing about two-thirds of the horn, which will grow back. But this creates the problem of storing this extremely valuable item. Poachers and smugglers often find out where the horn is stored and will kill anything in their path to steal this very valuable substance. Worse, even dehorned rhinoceros are often killed as poachers don't want to spend time tracking an animal that has had most of its horn removed.

The demand for rhino horn continues. The current ban, which has been in place since 1977, has done nothing but contribute to the demise of rhinoceros. Well intentioned funds from the Western Hemisphere to “save” the rhino often force our Western values (or old colonial views) on Africa—which results in wasted dollars, offending Africans and more dead rhinos. To combat this problem, Namibia and South Africa have attempted to legalize and heavily regulate the trade of the horn. The legal trade of rhinoceros horn is the only way to save the rhino and take pressure off the breeders who have invested so much into the survival of the rhino. To date, many of the private breeders have had to close their doors. The dangers of housing billions of dollars' worth of horn and the enormous cost of owning and caring for the animals take its toll. Without some monetary way to compensate private breeders, this will continue to happen.

These threats combined with the mire of a permitting system that discriminates against non-NGOs has sealed the fate for species such as southern white rhino. Without new avenues to offset the cost of care for these animals, rhinoceros will disappear from this planet in the very near future. I'm very sorry to say that our very own U.S. Fish & Wildlife Service opposed Namibia and South Africa's attempt to legalize a small amount of regulated trade in rhino horn at

the CITES convention last year. This is a huge disappointment as other countries look to the US to lead on these issues.

Contrary to what you hear from some countries, we must also be cautious about believing that poaching is declining due to effective regulation. For example, in countries where poaching has supposedly reduced, what's really happening is that there are simply fewer rhinos to poach. All these statistics show us is how we have failed to protect these animals on the African continent.

The US Role in International Wildlife Conservation

What does any of this have to do with the subject of today's hearing and what can an American First Administration do? Sadly, the U.S. government has been more of a hinderance than help in my endeavor to save rhinos. From arbitrary red tape that has no basis in statute to permitting delays to requirements that cause undue stress on the rhino, all I ask is that the US government try to be helpful rather than antagonistic. I don't receive any federal funding, nor am I asking for it. I am asking for the US government to its job—they should be processing permits in a timely way, for all Americans. These are live animals—they don't have seven years to wait for a permit. Imagine if it took seven years to adopt a dog or sell your cattle. People would simply stop doing it.

My hope is that the US will stop their decades long support of the black market and open avenues for the regulated trade of rhino horn. Nothing less than this will be sufficient to save the rhino.

Thank you.

Sources of Information and Additional Resources

<https://www.savetherhino.org/rhino-info/poaching-stats/>

<https://www.dailymaverick.co.za/article/2020-01-10-botswanas-rhinos-are-under-siege-its-time-to-learn-from-historical-mistakes/>

<https://www.theguardian.com/environment/2026/jan/15/africas-elephant-conundrum-dying-out-south-sudan-too-many-zimbabwe-aoe>

<https://www.wrsa.co.za/post/high-court-rhino-horn-victory-a-legal-lifeline-unlocks-sustainable-funding-for-south-africa-s-rhino>

The Origins Foundation Podcast: Episode 580 Mike Toft 4,000 Rhino Dehorning and Counting
<https://podcasts.apple.com/us/podcast/episode-580-mike-toft-4-000-rhino-dehorning-and-counting/id1543788045?i=1000719962126>

Poaching Statistics

The loss of wildlife to the illegal take trade (i.e., poaching) is arguably the biggest issue facing wildlife conservation today due to burgeoning human population requiring resources, both for sustenance and as an indication of affluence. Sustenance poaching is tied to the illegal bushmeat trade. Bushmeat trade is a multi-million-ton scale (4-5 million tons) annually. It is non-selective, inhumane, unethical, unregulated. Affluence poaching in Africa is tied to elephant ivory and rhino horn. The rhino horn trade was banned in 1977.

Total Rhino Population 1970's:

- **African rhinos (black + white): 70,000**
 - Black rhino: 65,000
 - White rhino: 5,000

Total Rhino Population 1990's:

- **African rhinos: 10,000**
 - Black rhino: 2,300
 - White rhino: 7,500

Total Rhino Population 2020's:

- **Black rhinos (*Diceros bicornis*):** approx. **6,788** individuals (Critically Endangered)
- **White rhinos (*Ceratotherium simum*):** approx. **15,752** individuals (Near Threatened)
- **Total (black + white rhinos in Africa):** approx. **22,540** rhinos.

Total Rhino Poached since 1977:

- Conservative estimate of loss – 25,000 – 35,000 rhinos poached since 1977
- 2027 will be the 50-year anniversary of the ban in rhino horn trade
- Prior to 1977 ~ 23 African countries had rhinos
- Several countries (**6 permanently, 5 temporarily**) lost rhinos entirely
 - 6 countries lost all native rhinos (Angola, CAR, Ethiopia, Sudan, Somalia, Cameroon);
 - 5 countries lost all rhinos and have reintroduced them in small numbers (Uganda, Rwanda, Botswana, Zambia, Malawi)
 -
- **85% of Africa's rhinos alive in 1977 were killed**

Citations

1. International Union for Conservation of Nature (IUCN). Leader-Williams, N. (1992). The World Status of Black Rhinoceros (*Diceros bicornis*). Gland, Switzerland: IUCN Species Survival Commission. → Establishes African black rhino population estimates of ~65,000 in the early 1970s and documents collapse to ~2,300 by the early 1990s.
2. International Union for Conservation of Nature (IUCN). Emslie, R., & Brooks, M. (1999). African Rhino: Status Survey and Conservation Action Plan. IUCN/SSC African Rhino Specialist Group. → Authoritative synthesis for 1970s–1990s declines, attribution of losses primarily to illegal killing for horn.
3. TRAFFIC. Martin, E. & Vigne, L. (1997). The Rhino Horn Trade: A Briefing. TRAFFIC International. → Links rhino population collapse directly to commercial horn demand; foundational justification for the 1977 trade ban.
4. CITES. CITES Secretariat. (1977–2024). Proceedings of the Conference of the Parties (CoP) – Rhinoceros agenda items. Geneva. → Official range-state population submissions and numbers used in international decisions.
5. South African Department of Forestry, Fisheries and the Environment (DFFE). Government of South Africa. (2010–2025). Annual Rhino Poaching and Population Reports. Pretoria. → Gold-standard annual poaching totals and national population estimates; used for all South Africa numbers post-2010.
6. Kenya Wildlife Service (KWS). KWS. (1980–2025). Rhino Conservation Programme Reports. Nairobi. → Kenya population collapse and recovery figures.
7. Namibia Ministry of Environment, Forestry and Tourism (MEFT). MEFT. (1990–2025). Black Rhino Monitoring Reports. Windhoek. → Namibia's black rhino population trends and poaching losses.

8. Zimbabwe Parks and Wildlife Management Authority. ZPWMA. (1990–2025). Annual Wildlife Status Reports. Harare.
9. International Rhino Foundation (IRF). IRF. (Annual, 2010–2025). State of the Rhino. → Primary global consolidation of country-level rhino population estimates.
10. Save the Rhino International. Save the Rhino. (2010–2025). Rhino Population and Poaching Statistics. → Long-term trend summaries; corroborates IRF and government data.
11. Di Minin, E., et al. (2015). Predicting global poaching risk for African rhinos. PNAS, 112(11), 3433–3438. → Demonstrates poaching as the dominant mortality driver.
12. Ferreira, S. M., et al. (2018). Population growth of African rhinos under intense poaching pressure. Biological Conservation, 222, 16–23. → Confirms poaching exceeded biological replacement rates.
13. Kenya Wildlife Service (KWS). KWS National Wildlife Census 2025 Technical Report, Ministry of Tourism and Wildlife. Nairobi. → Kenya population collapse and recovery figures.

Numeric claim	Value	Source
African rhinos pre-1977	~70,000	IUCN (1992; 1999)
Black rhinos pre-1977	~65,000	IUCN (1992)
African rhinos early 1990s	~10,000	IUCN (1999)
Black rhinos early 1990s	~2,300	IUCN (1999)
White rhinos early 1990s	~7,500	IUCN (1999)
Conservative losses 1977–1990s	≥45,000	IUCN + TRAFFIC
SA rhinos poached 2010–2024	~9,700	DFFE (annual reports)
Africa poached 1995–2025	~14,700	IRF + national agencies
Conservative global poached total 1977–2025	~60,000	Aggregated from above
Kruger rhinos 2010	~10,700	SANParks / DFFE
Kruger rhinos 2024–25	~2,700–2,900	DFFE / IRF
Countries losing all rhinos permanently	6	IUCN Red List + national data
Countries extirpated then reintroduced	5	IRF / IUCN

Rhino population figures from 1977–2025 are derived from IUCN status surveys, CITES range-state submissions, national wildlife authority reports, and consolidated global syntheses by the International Rhino Foundation, forming the authoritative record of rhino decline and partial recovery.



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03 May 2024

The Director
CITES Office
The Ministry of Environment Fisheries and Forestry
Windhoek
Namibia

Dear Ms Hamunyela

Thank you to you and other MEFT Officials for the engagement with private White Rhino owners at the MEFT offices on 26 April 2024 in Windhoek.

From the statistics presented it is obvious that the private owners are the custodians of white rhino in Namibia and the future conservation success of the species is cradled in their hands. It is appreciated that Government understands this and is supporting the private white rhino owners in their endeavors.

Focusing on the technical recommendations that you presented to the meeting regarding the export of white rhino, herewith our initial comments:

1. NO RESTRICTIONS ON THE EXPORT OF WHITE RHINO TO RANGE STATES

With "Globalization" rhino conservation and the prevention of the extinction of a species is humanities responsibility as a whole.

The export to non-range states for breeding purposes allows populations to be established that act as an "insurance" population that can be called on to re-populate former range states where conservation efforts were unable to ensure the survival of the species. Once the factors that led to the demise of the population, and in the case of rhino this is poaching, have been mitigated then the species can safely be re-introduced.

There are a number of examples of conservation success stories where non-range populations have successfully been re-introduced to range states.

Vast outside resources made available to some range states has not been able to control rhino poaching, thus ex-situ populations are imperative as an insurance policy.

The establishment of these populations is done at the cost of the importer which has the added benefit for the private white rhino owners in that value is added due to demand for live Namibian rhino eligible for export.

Range states currently all face the same scourge of poaching. Unlimited exports to range states will dilute the Namibian white rhino population with little guarantee that these rhino will contribute to rhino conservation in any way.

There are recent examples of bad outcomes resulting from the export to range states where the exported rhino in a short space of time have been poached.

The export to range states rarely is of value to the private white rhino owner as the importing country relies on the animals being donated and the costs being funded by NGO's reliant on non-rhino generated funding.

Namibia has been at the forefront championing sustainable utilization of natural resources knowing that sustainability ensures long term conservation.

Reliance on "donor dollars" is not sustainable as these are easily diverted by politics, sentiment and lobbyists with their ulterior motives.

There are considerable contributions that have been made in advance and pledges for future contributions to "in-situ" rhino conservation projects in Namibia as a direct result of exports of white rhino to non-range states. Some of these contributions have been to Black rhino projects ensuring support of rhino conservation in Namibia as a whole.

2. NO RESTRICTIONS ON TROPHY HUNTING

Rhino bulls eligible for hunting take many years to reach trophy status. The cost and risk to a private rhino owner in relying on this source of income greatly dilutes the return and contribution made to rhino conservation. Furthermore, a very limited number of rhino are trophy hunted every year.

Rhino eligible for export are sought after at a young age demanding premium prices. A buoyant sustainable export market ripples through and supports the local price of rhino as a whole. These live sales are the most significant source of income to the private white rhino owner currently. This enables owners to carry the extra ordinary burden of caring for and protecting rhino.

Concerns that trophy hunting of rhino in non-range states will be competition for hunting outfits in Namibia are unfounded. A CITES condition of import to a non-range state is that the rhino and their progeny may not be hunted outside of their natural range.

That these prohibitions will be ignored are highly unlikely as this would be a blatant disregard of the convention and would pierce to the heart of the integrity of CITES and its rules and regulations making any undertaking by a non-compliant signatory to the convention a farce.

3. EXPORT TO NON – RANGE STATES ONLY FOR ZOOLOGICAL PURPOSES LIMITED TO FIVE RHINO TO DESTINATIONS REGISTERED WITH RECOGNISED ZOO ASSOCIATIONS.

This recommendation does not provide any comfort as to the suitability of the destination for white rhino.

Live white rhino for export to non-range states are listed under appendix 1 of CITES. Namibia further imposes a source code of "W" on the white rhino. These annotations put considerable responsibility on the CITES authority in the importing country to ensure that the destination is appropriate and acceptable for the rhino. This determination is not taken lightly and is applicable to every application, not only zoos.

Should the CITES authority in Namibia have concerns with regard to this determination in the importing country then they are duty bound to engage with their counterparts in the country of destination. Should there still be doubt then a further layer of protection could be introduced whereby the Namibian authority do a site inspection of the destination themselves to validate the findings of the importing country.

The proposed restriction will greatly reduce the demand for white rhino exports from Namibia to a almost non-existent point. The ripple effect of this will wipe out the value of young white rhino and depress the rhino prices in general with the immediate consequences to the private white rhino owner, taking away their only significant current source of income from live sales.

It is agreed that not all destinations are equal and that all CITES authorities are not as conscientious as others.

Considering every export permit application on its merits will certainly not be as devastating to the white rhino industry and its conservation efforts as a blanket ban to non-range state destinations that are not zoos for breeding purposes will be.

4. RHINO TO BE DEHORNED, MICROCHIPPED AND RHODIS TESTED PRIOR TO EXPORT.

Robust enforcement of these requirements are imperative to avoid the illegal export of white rhino from Namibia that are not of Namibian origin.

Enforcement of this is strongly supported to avoid reputational damage to Namibia.

Evident in the meeting was that the proposed policy changes are primarily aimed at restricting the export of white rhino to non-range states. These restrictions are being driven by pressure from within CITES and other external interest groups to limit the number of white rhino being exported from Namibia.

It is understood that the resultant effect of the proposed policy changes are an appeasement in an attempt to be a "sweetener" for the proposals being considered at the next CoP with regard to the legalization of trade in rhino horn.

The reality of this is that in the highly unlikely event that the proposal is successful, it will be many years before the restrictions and conditions imposed on the trade of horn could be met. While all this is unfolding private white rhino owners will have a serious deficit in terms of possible income to sustain their conservation efforts as custodians of Namibian white rhino. The very real possibility exists that they will not survive long enough to benefit from any horn trade.

Owners proactive in their approach regarding sustainable utilization as a means of promoting "in-situ" rhino conservation, have committed to projects to export white rhino to suitable non-range destinations in a process that spans many years. Significant investments have already been made in this regard.

Destinations are currently spending many millions of US dollars in meeting their importing country's CITES authorities' requirements to ensure that the destinations are appropriate and acceptable prior to the issuing of the CITES import permits.

Only once these import permits have been issued can the rhino owners apply to the Namibian authorities for the export permits.

Should the proposed policy changes be adopted we respectfully request the following:

If irrefutable proof can be supplied of a project having been initiated prior to the consideration of the above proposed policy changes (26 April 2024), then could the export permit application be considered under regulations in place at the time of initiation of the project?

Sincerely



Jaco Muller