

CONSIDERATION OF PROPOSALS FOR AMENDMENT OF APPENDICES I AND II

A. Proposal

To amend Annotation ° 604 regarding the Namibian population of *Loxodonta africana* to read:

- ° 604 For the exclusive purpose of allowing in the case of the population of Namibia
- a. trade in hunting trophies for non-commercial purposes,
 - b. trade in live animals for non-commercial purposes to appropriate and acceptable destinations (as determined by the national legislation of the country of import),
 - c. trade in hides,
 - d. trade in leather goods and ivory carvings for non-commercial purposes,
 - e. trade in registered stocks of raw ivory (whole tusks and pieces) of Namibian origin owned by the Government of the Republic of Namibia, to trading partners that have been verified by the CITES Secretariat to have sufficient national legislation and domestic trade controls to ensure that ivory imported from Namibia will not be re-exported and will be managed according to all requirements of Resolution Conf. 10.10 (Rev.) concerning domestic manufacturing and trade. No international trade in ivory to be permitted until 18 months after the adoption of the proposal (May 2004). Thereafter, an initial amount of not more than 10 000 kg ivory may be traded, followed by annual export quotas of not more than 2 000 kg ivory, from the year 2005 onward.

B. Proponent

Republic of Namibia.

Summary

Current proposal: Namibia, with this proposal, wishes to establish a regular form of controlled trade in ivory in support of elephant conservation and the maintenance of elephant habitat. This entails the export of 10 000 kg accumulated stocks in 2004, followed by annual export quotas of 2 000 kg, commensurate with the projected annual accumulation of ivory. Namibia furthermore wants to promote controlled trade in elephant hide, leather and worked ivory, as outlined in the proposed amendment to the annotation. Namibia undertakes to adhere to the stated precautionary measures for trade in raw ivory (outlined in section 6) in order to prevent any negative conservation impact on any other elephant population or to stimulate illegal hunting or trade. Revenue from regulated trade will, as previously, be managed through a trust fund and used exclusively for elephant conservation and community conservation and development programmes within the elephant range.

Conservation and management of Namibia's elephants: The Namibian elephant population is secure and viable, and the availability of habitat for elephants is increasing. The biggest potential long-term threat to the Namibian elephant population is nevertheless the loss of habitat. Elephants, through their negative impacts on subsistence agriculture and absolute dependence on water resources under the control of people, can easily be excluded from large parts of Namibia outside protected areas. Without a way of benefiting from elephants, elephants only can be seen as a liability or loss to rural communities, who lose significant subsistence crops and even human lives to elephants. The strongest way to prevent this displacement is to integrate elephants into rural economies as assets and to demonstrate that elephants contribute to the welfare and development of people. The involvement and empowerment of people in natural resource

management, in combination with economic and financial incentives through sustainable use, and linked with skills development and capacity building, have been driving forces behind changes in attitudes towards wildlife on communally owned land in Namibia. In the northwest of Namibia, wildlife numbers have increased dramatically, and illegal killing has declined to almost zero (with no increase in law enforcement). Controlled trade in ivory, in addition to other direct and indirect forms of economic use of elephants, is therefore in the best interest of the Namibian elephant population. Controlled trade will help to ensure continued access to land outside protected areas by providing strong incentives to communities to protect elephants and their habitat. By contrast, law enforcement alone, without associated incentives, does not provide long-term security from displacement by other forms of land use.

Experimental trade in ivory in 1999: Namibia unambiguously demonstrated that it has complied in full with every requirement imposed by the Conference of the Parties, the Standing Committee and the CITES Secretariat concerning the trade in ivory. Namibia contributed to the development of a rigorous international trade control system for raw ivory and successfully conducted an experimental export of raw ivory in 1999 within that system. This export trade was successful in all respects, and was conducted transparently and under intense international supervision. Namibia demonstrated with the experimental trade of ivory to Japan in 1999 that all necessary trade controls are in place. It has a functional trust fund under parliamentary supervision for the distribution of trade revenues, all of which are earmarked for conservation. The implementation of Decision 10.1 proved that, with adequate controls and strict enforcement measures, ivory can be traded legally, in such a way as to prevent any ivory other than registered, legal stocks from entering such legal trade.

Commitment to other CITES requirements concerning elephant conservation: Namibia has complied with every requirement of CITES concerning the conservation of the African elephant. Namibia continues to exercise strict control over all ivory stocks, but remains concerned over the high costs and security implications of large ivory stocks. Ivory continues to accumulate, primarily through natural mortalities. The climate in Namibia is dry, making it virtually impossible to maintain ivory quality without huge expenditures. Namibia has reported all information on ivory stocks, seizures and quotas and the implementation of the MIKE monitoring system within Namibia is now in its third year. By November 2002, all selected MIKE sites within Africa will be fully equipped to collect MIKE data (MIKE Director, *pers. com.*). In recognition of the delay in implementing MIKE within Africa, Namibia has built in an 18-month delay in this proposal to provide a further opportunity to collect baseline data prior to the next ivory exports. However, beyond that time, Namibia cannot be held hostage to the inability or unwillingness of other range States to implement MIKE or to improve national legislation and management practices.

C. Supporting statement¹

1. Taxonomy

- 1.1 Class: Mammalia
- 1.2 Order: Proboscidea
- 1.3 Family: Elephantidae
- 1.4 Species: *Loxodonta africana* (Blumenbach, 1797)
- 1.5 Scientific synonyms: None

¹ For more background information, please also see Proposals 10.20 and 11.22 submitted by Namibia to CoP10 and CoP11 respectively.

| | | |
|-------------------|----------|-----------------------------|
| 1.6 Common names: | English: | African elephant |
| | French: | éléphant d'Afrique |
| | Spanish: | elefante africano |
| 1.7 Code numbers: | CITES | A-115.001.002.001 (1984(1)) |
| | ISIS | 5301415001002001001 |

2. Biological parameters

2.1 Distribution

Historically, elephants occurred at low densities throughout Namibia, wherever surface water could be found during the dry season, and at highly variable densities over larger areas during past wet seasons. Currently, elephants are found in a continuous zone across northern Namibia although some of this range is infrequently used (Fig. 1). Elephants in Namibia are migratory-nomadic and depend on their mobility to exploit favorable opportunities over a very large range. They typically have distinct dry season ranges and much larger wet season dispersal areas (estimated at over 100 000 km²). Elephant distribution in Namibia has been expanding as the result of population increases, and increasing habitat availability.

2.2 Habitat availability

Elephants in Namibia occur in the northern Namib Desert, the central northern *Colophospermum mopane* savannas; semi-arid woodlands of the northern Kalahari system and riparian systems of the Okavango, Kwando, Chobe, Linyanti and Zambezi Rivers in the northeast of the country. This area includes three distinct land tenure categories, namely protected areas, communal land and privately owned commercial land. The availability of habitat for elephants in protected areas in Namibia significantly increased during the past century, through the development of the protected area network and by the provision of surface water in addition to existing springs.

Elephants are not confined to any protected area, however, and elephant habitat should be seen within the context of seasonal and longer-term variation in elephant distribution and human settlement as influenced by climatic variation. The bulk of elephant range outside protected areas falls within the category of communal land (indigenous people and subsistence farming). In this regard, several communal land conservancies have now been declared or are emerging (see Fig. 1). Communal conservancies are formed with the primary reason of benefiting communities from the sustainable utilization of natural resources, which can only be achieved through careful management and protection of these resources. A total of 35 441 km² of land within the elephant range outside protected areas now consists of proclaimed communal conservancies, and approximately 11 000 km² is covered by emerging communal conservancies. Many of these conservancies fall within the critically important districts in northeastern Namibia that serve as the migratory routes, drought corridors or seasonal range of several thousand elephant and the potential dispersal area for even more elephants concentrating in the Linyanti system along the Botswana border and the Chobe National Park (hereafter N.P.) in Botswana.

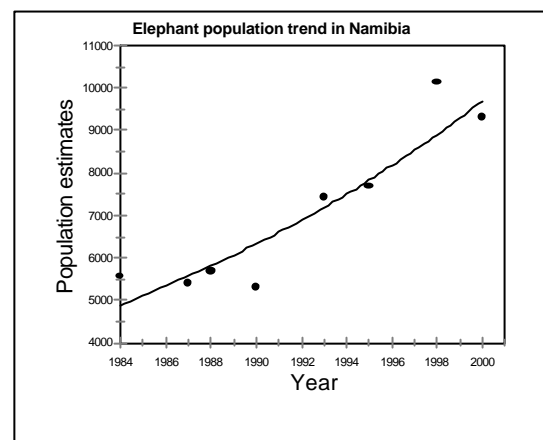
2.3 Population status

The following table shows the most recent estimates of the main elephant populations in Namibia, obtained from aerial surveys, based on standardized sample counting techniques. It must be noted that elephants are highly mobile in Namibia, and that movement in and out of areas can therefore cause major periodic fluctuations in numbers over time. The year 2000 experienced a particularly good rainy season, and it is therefore likely that elephants remained dispersed well into the dry season aerial surveys.

| Area | Year of latest estimate | Estimated elephant population |
|-----------------------|-------------------------|-------------------------------|
| North-East Parks | 1998 | 4576 |
| Khaudom | 2000 | 1211 |
| Nyae-Nyae Conservancy | 2000 | 755 |
| Kunene Region | 2000 | 663 |
| Etosha National Park | 2000 | 2100 |
| TOTAL | | 9305 |

2.4 Population trends

The Namibian elephant population has remained viable and increasing. The figure shows the elephant population trend in Namibia since 1984 based on aerial surveys and estimates derived from partial aerial and ground surveys. Although survey methods have changed and developed with time, it must be noted that the estimates for 1990, 1995, 1998 and 2000 are all based on similar sample aerial surveys. The estimated annual rate of increase, obtained from the regression, is $4.35\% \pm 1.8\%$. The exponential curve fitted (excluding the 2000 figure, which contains some estimates not updated since 1998 and is therefore not entirely independent from the previous data), is significant (df 5, $t = 4.76$, $p < 0.01$).



2.5 Geographic trends

Geographic range for elephants has been increasing in Namibia. The current elephant range is probably the largest that it has been in more than a century, with elephants expanding into previously unused or rarely used parts of the Kunene region. The population of Etosha N.P. dates back only to 1950, while the population in Khaudom Game Reserve - Tsumkwe district was founded in the early 1970s (MET data). As indicated under section 2.2, the emergence of large communal land conservancies within permanent and original elephant range has greatly increased the areas available to elephants as long as elephants can be seen as an asset to these communities.

2.6 Role of the species in its ecosystem

Elephants indisputably have a significant impact on subsistence farming activities and community life that, in the case of land outside protected areas, is of greater importance at present than their broader ecological role in ecosystems shared with people. Conflicts between people and elephants over water and crop damage have severely increased in the past decade, and will become the most serious area of conflict in future. This situation can be counteracted if elephants are perceived to have value to the communities living with them. (For more background information please refer to Proposal 10.20).

2.7 Threats

Elephant habitat in Namibia is prone to serious periodic droughts and is arid or semi-arid in general. The Namibian elephant population, based on historical accounts and direct monitoring has

nevertheless managed to increase throughout the previous century despite arid conditions. The principal reason for drought tolerance is the great mobility of elephants in Namibia and knowledge of terrain that allows them to travel long distances between waterholes. It is vital that elephants retain access to range in and out of protected areas and to vital movement corridors, as would only be possible if they are not seen as being incompatible with farming practices. If communities are not able to benefit from the presence of elephants through sustainable utilization, and through trade in ivory recovered from natural mortalities, elephants outside protected areas in Namibia face a serious long-term threat of displacement through progressive range conversion to subsistence agriculture. The approximately 50 000 km² of elephant range occurring within protected areas will nevertheless provide secure habitat for 6000 elephants at an average stocking rate of 0.12 elephants per km², and will serve as dry season refugia for elephants that use land outside protected areas.

The Namibian elephant population is secure and viable, and the fact that this population has been recovering throughout the past century in semi-arid habitat indicates its resilience.

3. Utilization and trade

3.1 National utilization

Namibia has not exploited elephants directly for commercial trade or domestic consumption, except through sport hunting and photo-tourism. Small numbers of elephants were removed in 1983 and 1985 to achieve specifically targeted population reductions for conservation purposes during drought periods in Etosha N.P. All ivory traded under Decision 10.1 was an accumulation of ivory originating from natural and management related mortalities, and can thus be seen as a byproduct of effective long-term management. It must be stressed that no elephants have been, or will be, killed specifically to obtain ivory for trade. Ivory is recovered from all recorded natural mortalities as well as elephants destroyed as problem animals, and strict national legislation makes it obligatory for the public to hand in any ivory found.

Sport hunting (trophy hunting, recreational hunting): The current level of sport hunting is largely determined by the 0.5% of standing population guideline (Martin 1986). This implies that the maximum adult male off-takes through sport hunting at present should not exceed approximately 50 per year at current population size. MET has established a national annual export quota through CITES of 75 trophy hunted elephants per year (150 tusks per year). This quota level was necessary to allow for the possibility that the tusks of elephants hunted in one year may only be exported the following year, as could result from delays in importing countries or the processing of specimens by taxidermists. In fact, the actual number exported amounted to 23 (46 tusks) in 1997, 48 (96 tusks) in 1998, 38 (76 tusks) in 1999, 43 (86 tusks) in 2000 and 34 (68 tusks) in 2001.

Elephant hides: Namibia currently does not routinely recover elephant hides from the few cases when elephants are destroyed for management reasons (e.g. problem animal control), due to the lack of suitable storage facilities, and the current inability to market hide. The only hides collected are from trophy animals, when sport hunters wish to export hide. However, the recovery of hides from problem animals will be pursued in future, in order to maximize benefits that can be re-invested into elephant conservation. The number of hides collected in this respect would average less than 20 per year.

Leather goods and ivory carvings: Namibia wishes to develop the necessary control measures for an ivory carving and elephant leather goods industry. Such initiatives would ensure that communities fully benefit from elephant mortalities (natural or management related) within their areas. It would also ensure that excess leather obtained from trophy animals could be utilized.

Ivory stocks: The current status (as of 6 June 2002) of the Namibian ivory stocks is summarized in the following table, where natural and management origin refers to ivory obtained from natural

mortalities, or from management related practices (i.e. of legal, Namibian origin); seized origin refers to ivory recovered through seizures (i.e. of illegal origin) and unknown refers to items for which no documentation is available:

| Origin | Description | Total number | Total weight (kg) | Mean weight (kg) |
|------------------------|---------------------|--------------|-------------------|------------------|
| Natural and Management | Whole tusks | 838 | 5 381.10 | 6.42 |
| | Ivory pieces | 757 | 1 471.73 | 1.94 |
| Sub-total | | | 6 852.83 | |
| Seized | Whole tusks | 5 008 | 30 394.80 | 6.07 |
| | Ivory pieces | 164 | 396.33 | 2.42 |
| Unknown | Whole tusks | 188 | 1 111.89 | 5.91 |
| | Ivory pieces | 567 | 340.17 | 0.60 |
| Total | Whole tusks | 6 034 | 36 887.79 | |
| | Ivory pieces | 1 488 | 2 208.23 | |
| GRAND TOTAL | | | 39 096.02 | |

Since 9 January 1997, when Namibia declared the ivory stocks that were sold in terms of Decision 10.1 in 1999, a further 5 381 kg of raw ivory (838 whole tusks) has been accumulated. There is also 1 472 kg of raw ivory pieces (which originate from natural breakages) available (none of which was offered during the experimental trade). Thus, Namibia already has an accumulation of 6 853 kg of ivory originating from natural mortalities and management activities, and it can be expected that by 2004, this will be closer to 10 000 kg. **It is this quantity of ivory that Namibia proposes to export in 2004, followed by an annual quota of 2 000 kg, based on the projected annual accumulation of ivory from natural mortalities and management activities.** With a mortality rate of between 1-5% per annum, and an average tusk weight of, for instance, 5 kg, using Namibian data ivory stockpiles should increase by approximately 100-500 kg per 1 000 elephants in the standing population per year - excluding ivory confiscated and seized. At the current population estimate of approximately 10 000, an accumulation of 1 000-5 000 kg per year can be expected. Not all ivory is likely to be recovered, but intensively patrolled and surveyed areas such as the open elephant range of Etosha N.P. and the Kunene region would facilitate recovery. Incentives (rewards) are also paid by the Management Authority and the Protected Resources Unit of the Namibian Police for ivory handed in by the public. The amount of ivory handed in appears to be consistent with the expected rate of mortality, and must represent a significant portion of elephant mortalities on communal lands.

All seized or confiscated tusks are separately stored, with some tusks being held on behalf of the Protected Resources Unit of the Namibian Police (PRU) as evidence for pending court proceedings. Growing ivory stocks represent major management, administrative and security problems. The cost of storing and managing these stocks in Namibia is at least USD 70 500 per year (based on a cost of USD 10 000 for the hire of suitable premises, USD 50 000 for a 24 hour security presence throughout the year, USD 500 for the maintenance of security and humidifying equipment, USD 10 000 for personnel costs associated with stock management) and the present facilities are inadequate in all respects for the long-term storage of ivory. Furthermore, ivory in storage declines in quality and value over time, and this represents a major cost to Namibia. The international conservation community has to take cognizance of this situation and the impasse that conservation agencies find themselves in, in countries where elephant populations have been expanding, where law enforcement is effective and where there is cooperation from the public.

Namibia maintains a detailed computer database of all specimens in storage, with source documentation, and all specimens are marked so as to make them individually recognizable. Namibia has provided to the CITES Secretariat a complete inventory of all stocks of raw ivory each year, before 31 January, as required by Resolution Conf. 10.10 (Rev.), and will continue this practice in future years.

3.2 Legal international trade

Namibia conducted its first legal international trade in ivory since 1984, in April 1999, as a highly regulated, experimental export of 12 367 kg to Japan. In its report to the 42nd meeting of the Standing Committee held in Lisbon 28 September-1 October 1999, the CITES Secretariat confirmed that the trade had taken place successfully, and that there was full compliance with all precautionary undertakings (Doc. SC.42.10.2.1). The revenue obtained from this auction was deposited in a Trust Fund, and is being used exclusively for projects that will benefit elephant conservation directly and to support rural conservation programmes.

3.3 Illegal trade

The incidence of illegal killing of elephants in Namibia is low (Annex 1). No elephant has been hunted illegally within Etosha N.P. for over two decades. Furthermore, incidents of illegal hunting of elephants in Namibia include cases of illegal shooting before or after elephants have damaged or have threatened to damage crops and farms, and where no attempt is made to collect the ivory. It is nevertheless very difficult to separate illegal hunting with the intent to collect ivory from all hunting incidents, and illegal hunting is notoriously difficult to monitor. Namibia has, however, contributed fully to the system to monitor the illegal trade in ivory and the illegal hunting of elephants, as outlined in the Notification to the Parties 1998/10, and has fully implemented the MIKE system (Monitoring of Illegal Killing of Elephants) at its allocated site.

The incidence of seizures of ivory in Namibia, as communicated also to the CITES Secretariat through the ETIS system, is summarized in Annex 2. The relatively high incidence of seized and confiscated ivory in Namibia is not so much evidence of illegal killing within Namibia, as of illegal trade through Namibia. Seizure levels point to successful law enforcement. The numbers of seizures have, nonetheless, declined in the past few years, and most tusks seized appear to be several years old.

3.4 Actual or potential trade impacts

Southern African countries see the absence of trade as the greatest threat to elephant populations in the region, stemming from the fact that elephants have in the past had no or very little direct value to rural communities, where so many elephants use land that people also depend on for farming. Elephants will only survive in the long term if they are more valuable to people than their damage to alternative forms of land use, i.e. subsistence farming. The controlled ivory trade will directly benefit the survival of the species as all revenue will be reinvested in elephant conservation in Namibia, including rural community conservation programmes, and monitoring of the impact of trade will be supported.

3.5 Captive breeding for commercial purposes

Captive breeding plays no role in the conservation of the African elephant.

4. Conservation and Management

4.1 Legal status

4.1.1 National

Elephants are classified as a "Specially Protected" species under the Nature Conservation Ordinance (Ordinance 4 of 1975) in Namibia. Hunting, capture, transport, being in possession, and trade (the import, export, re-export), in raw ivory, live animals and other derivatives are subject to permits and conditions. Ivory and all other parts of an elephant are classified as "Controlled Game Products" under Proclamation 42 of 1980. The maximum penalty for contraventions related to controlled game products is NAD 200 000 (approx. USD 18 200) and/or 20 years imprisonment. On the basis of the Animal Diseases and Parasites Act (Act 13 of 1956), the import and transit of raw wildlife products, including ivory, are subject to permits issued by the Veterinary department. The transport of raw wildlife products across national and international veterinary cordon fences requires a veterinary permit. Upon request, health certificates are issued for the export of such products. There is a general policy not to allow import of raw wildlife products from Angola and Zambia, and very strict controls apply to the movement of all biological derivatives and live specimens out of disease control areas.

4.1.2 International

According to the new IUCN criteria, the Namibian elephant population is classified by MET as "Conservation dependent", despite the fact that the continental population would be listed as "threatened", or arguably "endangered" on the basis of recent declines in other parts of the continental range, notably in forest areas where postulated declines were not in every instance backed up by accurate population estimates (African Elephant Specialist Group, SSC/IUCN).

4.2 Species management

4.2.1 Population monitoring

The Ministry of Environment and Tourism (MET) is responsible for monitoring elephants in protected areas and large parts of their range on communal lands. Aerial surveys have been used to monitor elephant populations in Namibia since the late 1960s, with gradual improvements and expansions until entire populations were covered in the 1970s. All surveys were initially aimed to be total counts, but diminishing funds prior to Independence lead to the use of sample techniques. MET aims, where possible, to survey the entire elephant range every second year, but more frequent estimates of population size will be derived for smaller management units or from censuses done for other purposes.

4.2.2 Habitat conservation

Almost 14% of the land surface of Namibia has been placed in proclaimed protected areas, including approx. 50% of the national elephant range. An increasing proportion of the elephant range is being incorporated into communal conservancies. A cornerstone of wildlife conservation philosophy in southern Africa is that habitat loss, not trade, ultimately threatens all wildlife outside protected areas, and indirectly also a substantial portion of wildlife inside those areas - unless wildlife becomes more valuable than the land use systems that are threatening to replace them. The entire focus is therefore aimed at protecting elephant (and other wildlife) habitat outside protected areas, by providing people with appropriate incentives and benefits from sustainable utilization of wildlife populations. Concerning elephants, the major forms of resource use will be the selling of sport hunting quotas and controlled trade in ivory recovered from natural mortalities and problem elephant control.

4.2.3 Management measures

Protected areas in Namibia are strictly managed to ensure minimal disturbance and to ensure the maintenance of bio-diversity. Management practices include the supply of water, management of pastures through controlled burning and stocking rates, prevention and control of diseases, research and monitoring of key environmental parameters and the provision of security through anti-poaching work by wildlife protection units.

Conservancies on communal lands operate under the guidance of the Ministry of Environment and Tourism with approved management plans where the requirement that resources are sustainably used is emphasized. Conservancies have to be registered with MET and are supported by MET in wildlife management and utilization, especially concerning population monitoring, quota determination, management plans, marketing and general training.

4.3 Control measures

4.3.1 International trade

Permit control: The MET permit office at Windhoek issues all permits relating to elephants or elephant derivatives. No competencies are delegated to local or regional authorities. (The Directorate of Veterinary Services in Windhoek issues all veterinary permits).

Marking of ivory: All ivory is marked in accordance with Resolution Conf. 10.10, and the marks are correlated with a database of ivory of known Namibian origin showing the source of each specimen. All specimens of ivory are furthermore marked in a standardized way derived from the domestic permit control system.

Customs and border control: Namibian Customs Officers check CITES, veterinary and transit permits. Where necessary, they refer to the district veterinary officer. Customs representatives played a key role in supervising the experimental trade of ivory in April 1999.

Law enforcement: Law enforcement is a joint effort by the Ministry of Environment and Tourism, the Protected Resources Unit of the Namibian Police, and the Customs Service. The incidence of ivory confiscations in Namibia points to effective law enforcement, especially by the Protected Resources Unit of the Namibian Police. Law enforcement agencies rely primarily on information, and well-established informer networks exist and are maintained. This approach has been the most effective in a situation of a low human density and government aiming to remain as small as possible.

Future trade controls: Only the Namibian population is included in this proposal. Ivory of Namibian origin held in other countries or in private ownership is excluded from this proposal. Trade will be restricted to an initial quota, and thereafter an annual export quota that will consist only of registered stocks of raw ivory of Namibian origin, excluding any seized or confiscated specimen regardless of origin or any specimen with inadequate documentary proof of origin. All specimens for export will have been individually marked in accordance with Resolution Conf. 10.10. All other ivory will also be individually marked and registered with the CITES Secretariat to ensure that there can be no mixing of unknown or foreign ivory. All seized and confiscated ivory is kept in a separate facility that will be accessible to the CITES Secretariat at any time. All sales will take place from a single center. Namibia will only trade with a country that has been verified by the CITES Secretariat to have sufficient national legislation and domestic trade controls to ensure that ivory imported from Namibia will not be re-exported and will be managed according to all requirements of Resolution Conf. 10.10 concerning domestic manufacturing and trade. The

built in delay of 18 months will allow potential trade partners, where necessary, the time to develop required legislation and trade controls, and to obtain the endorsement of the CITES Secretariat. All revenue from ivory sales will be used exclusively for elephant conservation and community development and conservation programmes. Namibia will cooperate with neighbouring countries in the monitoring of elephant populations and illegal trade, and will assist within its means, credible international organizations involved in such monitoring.

4.3.2 Domestic measures

Refer to paragraphs 4.1.1-3 and 4.3.1 regarding control and precautionary measures to ensure sustainable use and management of the elephant population, and preventing illegal trade from impacting on the national population. Standing policy determines that all MET officials must report elephant mortalities and recover ivory. All ivory has to be recorded and marked, and transported to the national stockpile in Windhoek as soon as possible.

5. Information on Similar Species

Not applicable.

6. Other Comments

Please see the summary provided at the beginning of the supporting statement.

Precautionary measures

The following specific precautionary measures will be an integral part of any quota for trade in raw ivory, in order to prevent any negative conservation impact on any other elephant population or to stimulate illegal hunting or trade.

- a. Namibia population only: Only the Namibian population is included in this proposal. Ivory of Namibian origin held in other countries or in private ownership are excluded from this proposal.
- b. A quota for registered stocks of raw ivory only: The export quota will refer only to the stock of raw ivory registered and managed by the Ministry of Environment and Tourism, and registered with the CITES Secretariat on an annual basis. Only ivory of known natural and management related mortalities (eg. problem animal control, recovery of ivory fragments from natural breakages) would be included in the export quota.
- c. Ivory to be marked with a standard system: All whole tusks in the stockpile are individually marked and the marks correlated with a register of ivory of known Namibian origin showing the source of each specimen. With respect to the fragments, only the larger pieces are individually marked, but the total mass of smaller pieces will also be registered with the CITES Secretariat annually.
- d. Sale through one single center: All raw ivory sales and subsequent packing and dispatch will take place only from the government's central ivory store in Windhoek, Namibia, at the Headquarters of the Directorate Scientific Services of the Ministry of Environment and Tourism (MET) as the CITES Management Authority in Namibia.
- e. Direct export of ivory only to registered importing countries: Namibia will only trade with a country that has been verified by the CITES Secretariat to have sufficient national legislation and domestic trade controls to ensure that ivory imported from Namibia will not be re-exported and will be managed according to all requirements of Resolution Conf. 10.10 (Rev.) concerning domestic manufacturing and trade.

- f. Independent monitoring: Enforcement personnel from the CITES Secretariat, or Parties and organizations agreed to in advance by the Namibian CITES Management Authority and the CITES Secretariat, may be present at any part or all of the sale, packing and shipping process to check all details and inventory. Similar inspection may take place when the containers are unloaded and the tusks distributed in the importing country. Access to all ivory storerooms under the control of MET will be guaranteed to the CITES Secretariat.
- g. Use of ivory revenue: All revenue from ivory sales will be paid into a special trust fund and will be used exclusively for elephant conservation (including monitoring, research, law enforcement, other management expenses) and community conservation and development programmes.
- h. Monitoring of the effects of the downlisting: Namibia will continue to cooperate with neighboring countries and with the CITES Secretariat in the monitoring of elephant population trends and illegal trade.

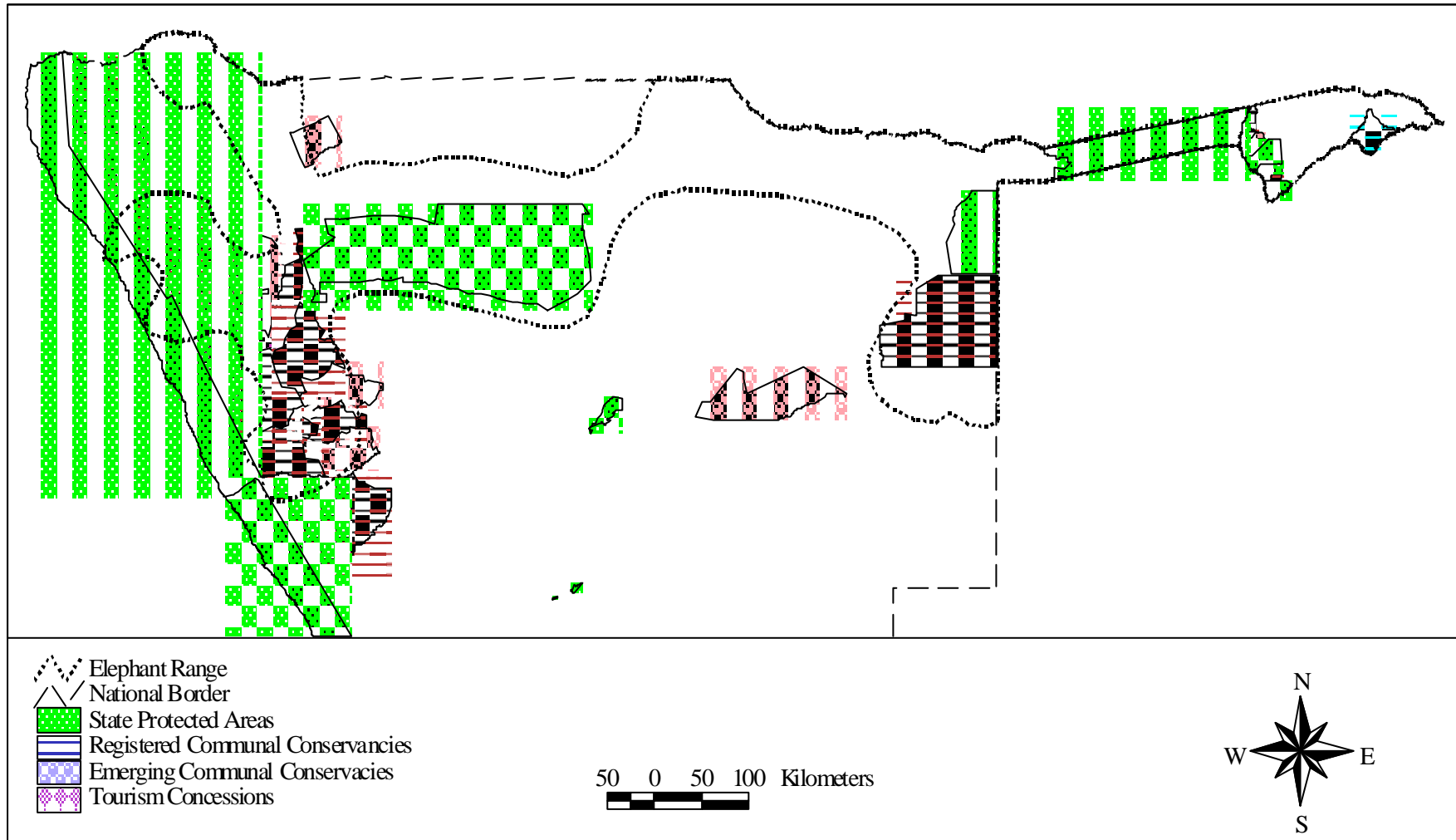
7. Additional Remarks

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Figure 1

Map showing the elephant range, protected areas, concessions and conservancies in northern Namibia



National Reporting Form on the Illegal Killing of Elephants

Country: **NAMIBIA**

| Reporting period | Total no. elephants killed illegally | National wildlife conservation authority | | Other conservation authorities | | Donor support | Specialized APU | Special intelligence unit (IU) |
|------------------|--------------------------------------|--|---------------------------------|--------------------------------|-----------------|---------------|-----------------|--------------------------------|
| | | Total budget (NAD) | Area of mandate km ² | Total budget | Area of mandate | | | |
| 1990 | 6 | No data | 840 000 | Not applicable | Not applicable | Yes | None | Yes |
| 1991 | 1 | 16 201 400 | 840 000 | Not applicable | Not applicable | Yes | None | Yes |
| 1992 | 6 | 19 836 980 | 840 000 | Not applicable | Not applicable | Yes | None | Yes |
| 1993 | 10 | 25 886 000 | 840 000 | Not applicable | Not applicable | Yes | None | Yes |
| 1994 | 7 | 29 847 000 | 840 000 | Not applicable | Not applicable | Yes | None | Yes |
| 1995 | 6 | 32 307 000 | 840 000 | Not applicable | Not applicable | Yes | None | Yes |
| 1996 | 11 | 38 462 000 | 840 000 | Not applicable | Not applicable | Yes | None | Yes |
| 1997 Jan-Jun | 2 | 48 630 000 | 840 000 | Not applicable | Not applicable | Yes | None | Yes |
| 1997 Jul-Dec | 2 | | 840 000 | Not applicable | Not applicable | Yes | None | Yes |
| 1998 Jan-Jun | 2 | 49 285 000 | 840 000 | Not applicable | Not applicable | Yes | None | Yes |
| 1998 Jul-Dec | 2 | | 840 000 | Not applicable | Not applicable | Yes | None | Yes |
| 1999 Jan-Jun | 5 | 115 077 762 | 840 000 | Not applicable | Not applicable | Yes | None | Yes |
| 1999 Jul-Dec | 7 | | 840 000 | Not applicable | Not applicable | Yes | None | Yes |
| 2000 Jan-Jun | 2 | 115 840 365 | 840 000 | Not applicable | Not applicable | Yes | None | Yes |
| 2000 Jul-Dec | 0 | | 840 000 | Not applicable | Not applicable | Yes | None | Yes |
| 2001 Jan-Jun | 0 | 107 782 000 | 840 000 | Not applicable | Not applicable | Yes | None | Yes |
| 2001 Jul-Dec | 2 | | 840 000 | Not applicable | Not applicable | Yes | None | Yes |

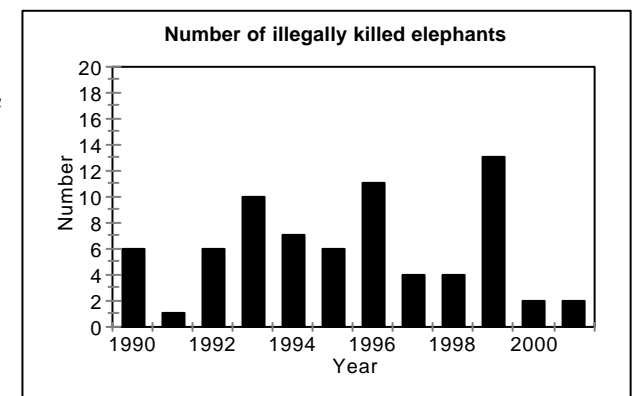
National wildlife conservation authority: **Ministry of Environment and Tourism**

Other conservation authorities: **None**

Donors providing support: **Germany, WWF International (others available upon request from IRDNC & SRT)**

Specialized APU: **None**

Special intelligence unit: **Protected Resources Unit, Namibian Police, Ministry of Home Affairs**



Summary of ivory seizures in Namibia

| Year | Number of seizures | Total no. Tusks seized | Mean no. of tusks/seizure | Total weight seized (kg) | Mean weight/seizure (kg) |
|------|--------------------|------------------------|---------------------------|--------------------------|--------------------------|
| 1984 | 3 | 18 | 6.00 | 50.30 | 16.77 |
| 1985 | 4 | 29 | 7.25 | 173.80 | 43.45 |
| 1986 | 14 | 160 | 11.43 | 573.30 | 40.95 |
| 1987 | 9 | 146 | 16.22 | 716.00 | 79.56 |
| 1988 | 22 | 294 | 13.36 | 1544.00 | 70.18 |
| 1989 | 22 | 1074 | 48.82 | 7609.82 | 345.90 |
| 1990 | 30 | 203 | 6.77 | 1372.08 | 45.74 |
| 1991 | 44 | 222 | 5.05 | 1807.46 | 41.08 |
| 1992 | 40 | 456 | 11.40 | 2596.24 | 64.91 |
| 1993 | 69 | 893 | 12.94 | 5926.50 | 85.89 |
| 1994 | 70 | 611 | 8.73 | 3017.64 | 43.11 |
| 1995 | 71 | 414 | 5.83 | 2028.62 | 28.57 |
| 1996 | 47 | 153 | 3.26 | 792.79 | 16.87 |
| 1997 | 53 | 126 | 2.38 | 791.85 | 14.94 |
| 1998 | 21 | 84 | 4.00 | 467.80 | 22.28 |
| 1999 | 19 | 77 | 4.05 | 410.50 | 21.61 |
| 2000 | 24 | 47 | 1.96 | 286.60 | 11.94 |
| 2001 | 18 | 41 | 2.27 | 219.70 | 12.21 |

Ivory seizures in Namibia

