

CONSIDERATION OF PROPOSALS FOR AMENDMENT OF APPENDICES I AND II

A. Proposal

Amendment of the annotation regarding the population of *Loxodonta africana* of Namibia to include:

- an annual export quota of 2,000 kg of raw ivory (accumulated from natural and management-related mortalities);
- trade in worked ivory products for commercial purposes; and
- trade in elephant leather and hair goods for commercial purposes.

B. Proponent

Namibia.

C. Supporting statement¹Summary

Current proposal: Namibia, with this proposal, wishes to establish a regular form of controlled trade in ivory in support of elephant conservation, including community-based conservation and the maintenance of elephant habitat. This entails establishing annual export quotas of not more than 2,000 kg, commensurate with the projected annual accumulation of ivory. Namibia undertakes to adhere to the stated precautionary measures for trade in raw ivory (outlined in section 6) in order to facilitate trade regulation, prevent any potential negative conservation impact on its or any other elephant population. Namibia also undertakes to comply with Resolution Conf. 10.10 (Rev. CoP12) regarding the control of trade in elephant specimens. 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. Namibia furthermore wants to establish controlled trade in leather (and elephant hair) products and worked ivory, as outlined in the proposed amendment to the annotation, for the purpose of value-addition to raw materials from renewable natural resources, also in support of elephant conservation and community-based conservation of elephants.

Conservation and management of Namibia's elephants: The Namibian elephant population is secure and growing, and the availability of habitat for elephants is increasing. The biggest threat to the Namibian elephant population is nevertheless the loss of habitat and the fragmentation of range through the interruption of access routes and conflicts with people in the absence of effective incentive mechanisms to maintain such habitat and to balance the costs of living with elephants in a subsistence agriculture environment. 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 are regarded as a liability and economic cost to rural communities, who suffer crop losses, other damages and lose human lives to elephants. The most effective strategy 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 rural 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 parts of the elephant range outside protected areas, wildlife numbers have increased dramatically, and illegal killing has declined to almost zero (with no significant increase in law

¹ For more background information, please also see Proposals 10.20, 11.22 and 12.7 submitted by Namibia to CoP10, CoP11 and CoP12 respectively.

enforcement effort). Controlled trade in ivory and other elephant specimens, as a way of increasing the economic value of elephants and the economic benefits that can be derived from them, 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.

Export of ivory in 1999: Namibia fully complied with every requirement imposed by the Conference of the Parties, the Standing Committee and the CITES Secretariat concerning the trade in ivory in 1999. Namibia contributed to the development of a rigorous international trade control system for raw ivory and successfully exported 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 this trade of ivory to Japan in 1999 that all necessary trade controls are in place. It has a functional, independently audited trust fund under parliamentary supervision for the distribution of trade revenues, all of which are earmarked for conservation. This trust fund has funded important components of Namibia's community-based natural resources management system, such as providing infrastructure against elephants in conservancies, creating additional water sources for elephants and developing community-run campsites. 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 holding 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 incurring 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 fifth year. In its proposal submitted to CoP12, Namibia included an 18-month delay to provide a further opportunity for the MIKE monitoring system to collect baseline data prior to the next ivory exports. Despite this delay, MIKE has not to date been able to supply the baseline data, as defined at the 49th meeting of the Standing Committee.

Appeal to the Conference of the Parties: Namibia has done its utmost, and at great cost, to make use of the mechanisms provided in CITES to exercise its rights as a Party to the Convention. These rights include trade in its elephant population, which clearly meets the criteria for inclusion in Appendix II, within the framework of the Convention for trade in specimens from Appendix-II-listed species. Notwithstanding existing remedial mechanisms within CITES concerning cases of unsustainable trade in Appendix-II-listed species, such as the significant trade review process or the transfer of a population to Appendix I, the Conference of the Parties has on previous occasions adopted increasingly complex requirements for trade in elephant specimens that have all but ensured that such trade does not take place. Namibia believes that this trend strongly undermines its rights as a Party and the credibility of CITES, and highlights the contradictions between CITES and the Convention and Biological Diversity. The Conference of the Parties is accordingly requested to fully consider this issue in its decision on this proposal. Namibia further requests the Conference of the Parties not to create further procedural obstacles by opposing annual quotas, and therefore to support the form of regulated trade that Namibia is proposing for its elephant specimens in recognition that such trade is an integral part of its elephant conservation and management system.

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
- 1.6 Common names: English: African elephant
French: Elephant 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 comparatively low densities throughout Namibia, wherever surface water could be found during the dry season, and at highly variable densities over larger areas during wet seasons. Currently, elephants are found in a continuous zone across northern Namibia, and although some of this range is infrequently used, elephants are becoming more abundant in areas from which recently they were absent (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 a much larger wet season dispersal range (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

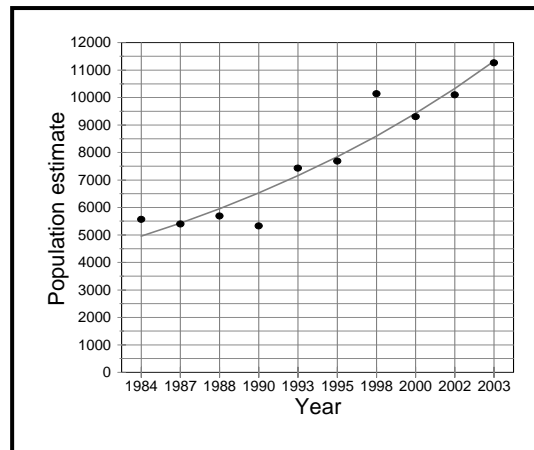
Elephants in Namibia occur in the northern Namib Desert, the central northern *Colophospermum mopane* savannas, semi-arid woodlands of the northern Kalahari system and riparian systems of the Okavango, Kwando, Chobe, Linyanti and Zambezi Rivers in the northeast of the country. This area includes three distinct land tenure categories, namely protected areas, communally-farmed State land (including registered communal conservancies) and freehold 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 and rivers.

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 the elephant range outside protected areas falls within the category of communal land principally used for subsistence farming. In this regard, 31 communal land conservancies have been registered (Fig. 1) with several more emerging. Communal conservancies are formed with the primary reason of benefiting communities from the sustainable utilization of natural resources. A total of 35,000 km² of land within the elephant range outside protected areas is now included in registered communal conservancies. Many of these conservancies fall within the critically important districts in northern 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 Chobe-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. Additional surveys are scheduled in the dry season of 2004 and status updates will be provided to CoP13.

Area	Year of latest estimate	Estimated elephant population
North-East	2003	5740
Khaudom Game Reserve	2002	1687
Nyae-Nyae Conservancy	2000	755
Kunene Region	2000	663
Etosha National Park	2002	2417
TOTAL		11262



2.4 Population trends

The Namibian elephant population is viable in all respects and is 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, estimates since 1990 are all based on similar sample aerial surveys. The current estimate is the highest recorded in recent history.

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).

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 dry season habitat for more than 6,000 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. It is not threatened.

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 or other products 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 55 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. 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, 34 (68 tusks) in 2001, 33 (66 tusks) in 2002 and 47 (94 tusks) in 2003.

Leather and hair goods: Namibia currently does not routinely recover elephant hides or hair from the few cases when elephants are destroyed for management reasons (e.g. problem animal control), due to the lack of suitable storage facilities. The only hides routinely collected are from trophy-hunted animals. However, the recovery of hides and hair from problem animals will be pursued, 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 30 per year. Hide and hair from trophy hunted animals however, can already be used to produce leather and hair products, and hence maximize the benefits accrued from these animals.

Ivory carvings: Namibia wishes to pursue the establishment of a strictly controlled, high-value carved ivory industry, based exclusively on the traditional carved ivory objects known in Namibia as 'ekipas' (round or oval carved ivory objects with a traditional geometric design, originally used for purposes of status, culture and barter). Ekipas are unique cultural objects only found in northern Namibia and southern Angola, and have become in high demand because of their aesthetic quality and cultural-historic value, and as elements in modern jewelry. Many ekipas have been exported as pre-Convention specimens and large collections are held in North America and Europe. There are indications that supplies of pre-Convention specimens have

become exhausted, and additional exports of such pre-Convention specimens would not be authorized in general. The Ministry of Environment and Tourism intends to support rural communities with traditional knowledge of ekipas to produce such items under strictly controlled conditions, and thus exploit the existing market demand for ekipas set in high-value jewelry pieces in combination with precious metals. This initiative will greatly increase economic benefits to communities within conservancies in regions where such items were originally produced, and support value-addition to raw materials.

Each item will be marked and identifiable through a unique numbering system, as finished jewelry products in combination with precious metals and other materials. This would therefore be a uniquely Namibian product, produced under strict controls.

Weathered and fragmented ivory, a significant portion of ivory recovered from natural mortalities, is ideally suited for the manufacturing of ekipas. Using lower-grade ivory for this purpose will improve the grade and value of raw ivory exports.

Ivory stocks: The current status (as of 16 April 2004) 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, most of which have been in stock for two or more decades:

Origin	Description	Total number	Total weight (kg)	Mean weight (kg)
Natural and Management	Whole tusks	949	6 170.00	6.50
	Ivory pieces	790	1 575.28	1.99
Sub-total			7 745.28	
Seized	Whole tusks	5 027	30 521.45	6.07
	Ivory pieces	177	440.83	2.49
Unknown	Whole tusks	188	1 111.89	5.91
	Ivory pieces	567	340.17	0.60
Total	Whole tusks	6 164	37 803.34	
	Ivory pieces	1 534	2 356.28	
GRAND TOTAL			40 159.62	

Since 9 January 1997, when Namibia declared the ivory stocks that were sold in terms of Decision 10.1 in 1999, a further 6,170 kg of raw ivory (949 whole tusks) has been accumulated. There are also 1,575.28 kg of raw ivory pieces (which originate from natural breakages) available. At CoP12, conditional approval was obtained to sell not more than 10 000 kg of raw ivory. With a mortality rate of between 1-5% per annum, and an average tusk weight of at least 5kg, using Namibian data ivory stockpiles should increase by approximately 100-500 kg per 1,000 elephants in the standing population per year. This estimation excludes ivory confiscated or from trophy hunting, the fraction of elephants that may die in neighbouring countries as part of a shared population and the incidence of tusk-less mortalities, but nevertheless gives a rough indication of annual production. At the current population estimate of approximately 11,000, and a recent average tusk weight of 6.5kg, an accumulation of 1,430 to 7,150 kg per year can be expected. Not all ivory is ever likely to be recovered, but intensively patrolled and surveyed areas such as the open elephant range of Etosha N.P. and the Kunene region yield large quantities each year. The current average actual recovery from the table above is about 900kg per year, but may vary greatly between years.

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. 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. CoP12), 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 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 established through an Act of Parliament, 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 albeit declining 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

Namibia along with other 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 or artificial propagation for commercial purposes (outside country of origin)

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 ND 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

The Namibian elephant population is considered to be secure and increasing by the Ministry of Environment and Tourism (MET). Analogous to the new IUCN criteria, the Namibian elephant population would fit into the category of "Conservation dependent". According to the IUCN criteria the continental population has a higher status 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). It is much more appropriate to consider the status of the southern African elephant population as a whole, currently numbering approximately a quarter of a million (African Elephant Specialist Group, SSC/IUCN, African elephant status report 2002).

4.2 Species management

4.2.1 Population monitoring

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 are derived for smaller management units or from censuses done for other purposes. Ground-based monitoring is done in several sites by conservancies.

4.2.2 Habitat conservation

Almost 14%² 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

² Approval has been granted for the proclamation of an additional national park in southern Namibia of 25,000 km², which will bring the total to over 17%, once the area has been gazetted.

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, a strictly controlled ivory carving industry using ivory made available from the central government stock 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 biodiversity. 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 MET 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 (Rev. CoP12), and the marks are included in 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 Namibian Police or 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 MET, 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.

Trade controls for raw ivory: 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 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 (Rev. CoP12). 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 is

accessible to the CITES Secretariat at any time. All sales will take place from a single centre. Namibia will only trade with countries 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. CoP12) concerning domestic manufacturing and trade. All ivory exported to any one country will be shipped as a single consignment per country. 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.

Trade controls for worked ivory: Possession, manufacturing and trade in all elephant specimens are regulated in Namibia. Persons or companies wishing to manufacture or trade worked ivory elephant have to be registered with the Management Authority and are required to maintain comprehensive records of stocks, manufacturing and trade in accordance with national legislation and Resolution Conf. 10.10 (Rev. CoP12). For the manufacturing of ekipa-based jewelry items for export, raw ivory will be provided from the Government stocks of certified Namibian origin, to approved manufacturers. A minimum size will be prescribed for all items to be exported to facilitate a permanent marking system that will consist of a unique code and number engraved on the reverse side of all items. A certificate containing the same number will be issued, for each specimen, complying also with the requirements of CITES Appendix II export permits.

Trade controls for hides and leather and elephant hair goods: Possession, manufacturing and trade in all elephant specimens are regulated in Namibia. Persons or companies wishing to manufacture or trade elephant hide, hair or leather goods have to be registered with the Management Authority and are required to maintain comprehensive records of origin of stocks, manufacturing and trade.

4.3.2 Domestic Measures

Refer to paragraphs 4.1.1-2 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 also see the summary provided at the beginning of the supporting statement.

Precautionary measures applicable to exports of raw ivory

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 MET, and registered with the CITES Secretariat on an annual basis. Only ivory of known natural and management related mortalities (e.g. problem

animal control, natural mortalities, 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 centre: 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 MET as the CITES Management Authority in Namibia.
- e. Direct export of ivory only to approved importing countries: Namibia will only trade raw ivory with countries 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. CoP12) concerning domestic manufacturing and trade.
- f. Independent monitoring: 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 any sale, packing and shipping processes to check all details and inventory. (Similar inspections may take place when the containers are unloaded and the ivory distributed in importing countries, as may be required by the CITES Secretariat). Access to all ivory storerooms under the control of MET will be guaranteed to the CITES Secretariat at any time.
- g. Use of ivory revenue: All revenue from raw ivory sales will, as previously, be paid into a special trust fund (established through the Game Products Trust Fund Act (Act No. 7 of 1997)) 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 trade: Namibia will continue to cooperate with neighbouring countries and with the CITES Secretariat in the monitoring of elephant population trends and illegal trade.

7. Additional remarks

8. References

Martin, R.B. 1986. Establishment of African ivory export quotas and associated control procedures. Report to CITES Secretariat.

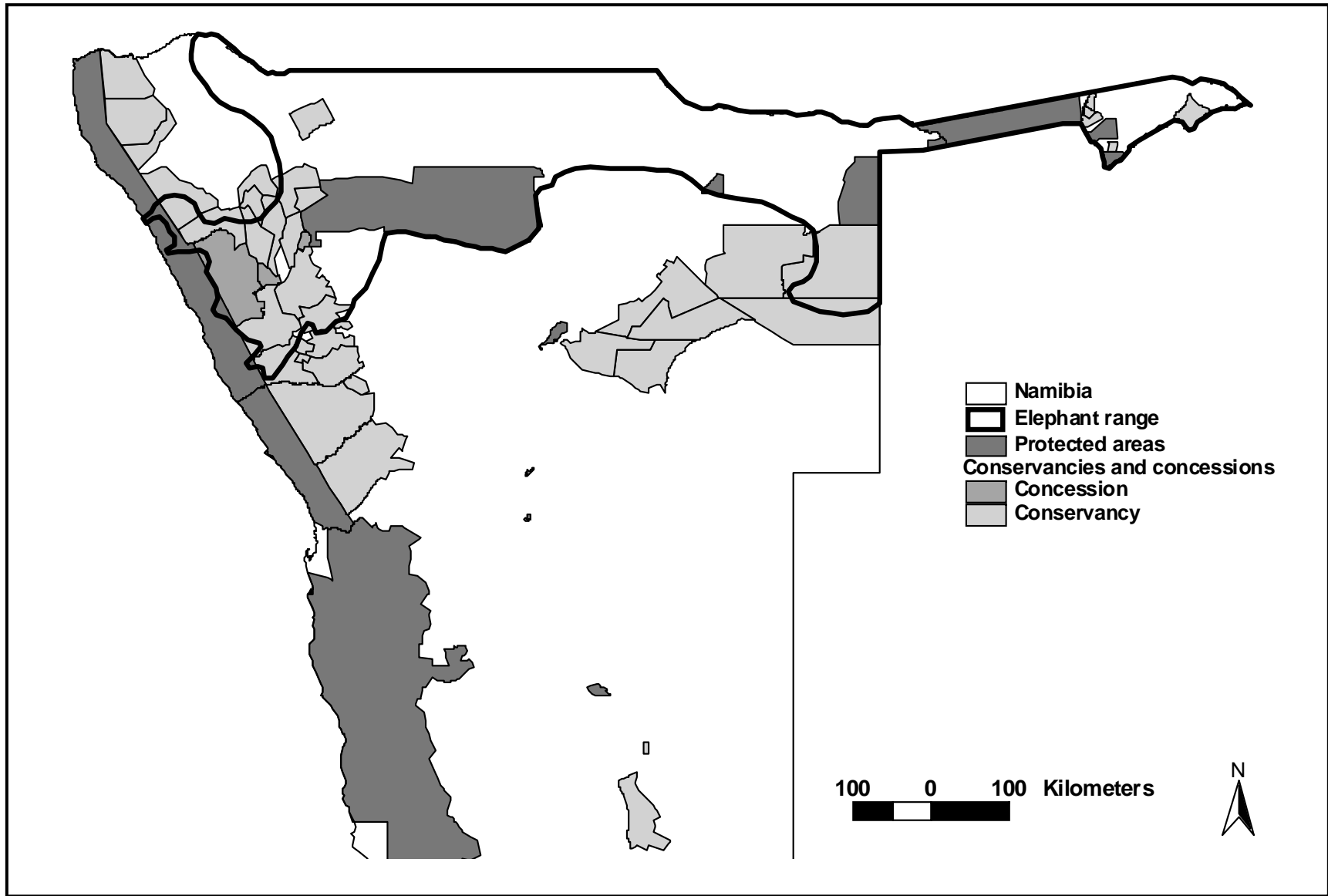


Figure 1 Map showing the elephant range, protected areas, concessions and conservancies in northern Namibia.

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 (N\$)	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
2002 Jan-Jun	0	123 971 000	840 000	Not applicable	Not applicable	No	None	Yes
2002 Jul-Dec	5		840 000	Not applicable	Not applicable	No	None	Yes
2003 Jan-Jun	1	149 333 000	840 000	Not applicable	Not applicable	No	None	Yes
2003 Jul-Dec	6		840 000	Not applicable	Not applicable	No	None	Yes

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

Other conservation authorities: **None**

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
2002	13	29	2.23	145.10	11.20
2003	10	41	4.1	309.40	30.90

