

CONVENTION ON INTERNATIONAL TRADE IN ENDANGERED SPECIES
OF WILD FAUNA AND FLORA



Eighteenth meeting of the Conference of the Parties
Colombo (Sri Lanka), 23 May – 3 June 2019

CONSIDERATION OF PROPOSALS FOR AMENDMENT OF APPENDICES I AND II

A. Proposal

Transfer of the population of *Ceratotherium simum simum* of Namibia from Appendix I to Appendix II with the following annotation:

For the exclusive purpose of allowing international trade in:

- a) live animals to appropriate and acceptable destinations; and
- b) hunting trophies.

All other specimens shall be deemed to be specimens of species included in Appendix I and the trade in them shall be regulated accordingly.

B. Proponent

Namibia*:

C. Supporting statement

1. Taxonomy

- 1.1 Class: Mammalia
- 1.2 Order: Perissodactyla
- 1.3 Family: Rhinocerotidae

1.4 Genus, species or subspecies, including author and year: *Ceratotherium simum simum* (Burchell, 1817)

- 1.5 Scientific synonyms: None
- 1.6 Common names:
 - English: Southern white or square-lipped rhinoceros
 - French: Rhinocéros blanc du sud
 - Spanish: Rinoceronte blanco del sur
- 1.7 Code numbers: CITES A-118.003.001.001

* The geographical designations employed in this document do not imply the expression of any opinion whatsoever on the part of the CITES Secretariat (or the United Nations Environment Programme) concerning the legal status of any country, territory, or area, or concerning the delimitation of its frontiers or boundaries. The responsibility for the contents of the document rests exclusively with its author.

2. Overview

As required in Resolution Conf. 9.24 (Rev. CoP17) Annex 6: Format for proposals to amend the Appendices, this population does not meet the criteria for inclusion in Appendix I (Annex 1 of the Resolution) as the wild population is not small (**Criterion A**); it is the second largest population of this species; a considerably smaller population has already been transferred to Appendix II; it is not declining; each sub-population is not small (there are five subpopulations of the Namibian population of white rhinos that are larger than the national population that was previously transferred to Appendix II); the majority of individuals are not concentrated geographically; there are no large short-term fluctuations and although all rhino populations tend to be vulnerable to external factors especially illegal killing and trafficking, this population has not been highly vulnerable as evident from its continuous growth. Intrinsic factors are not significantly limiting in any way. Concerning **Criterion B** for inclusion in Appendix I, the population does not have a restricted distribution. The population consists of multiple discrete subpopulations (and is thus not limited to occurrence at very few locations) and is subject to a metapopulation management strategy. The number and area of the subpopulations are not subject to large fluctuations, and the population is not highly vulnerable to external factors as stated under criterion A above; no decrease is observed, projected or inferred regarding distribution, area of habitat, number of subpopulations, number of individuals, quality of habitat or recruitment. Regarding **Criterion C**, no marked decline in population has occurred for 43 years since the re-establishment of this population or can be inferred or projected on the basis of a decrease in area or habitat, quality of habitat, levels or patterns of exploitation, a high vulnerability to intrinsic or extrinsic factors or decreasing recruitment.

Regarding the inclusion of the population in Appendix II, it is not required to meet any of the criteria as all populations transferred from Appendix I has to be first included in Appendix II (Annex 4 **Precautionary measure A.1.**). However, the proposal also includes an integral precautionary measure by limiting the scope of trade to live animals and hunting trophies, thus providing a second precautionary measure (**Precautionary measure A.2.iii**).

3. Species characteristics

3.1 Distribution

The southern white rhinoceros was formerly widespread throughout southern Africa, including Namibia, but by the late 19th century went extinct throughout the region including Namibia (Shortridge 1934) except for a small population that was left in the Umfolozi area of Zululand, South Africa.

In South Africa, numbers increased rapidly under protection, so that by 1961 there were sufficient numbers to translocate rhinoceros to new areas. In this way, the white rhinoceros has been re-established in most protected areas in South Africa, suitable protected areas in other southern African countries and on numerous private properties throughout its former range in Southern Africa, as well as in some countries elsewhere in Africa and in other institutions around the world. By 1997 numbers of this species had grown to over 8440 in 247 wild populations, with a further 650 animals in captivity (Emslie & Brooks 1999). The southern white rhinoceros is now the most numerous of the rhinoceros taxa and its recovery has been internationally recognized as one of the world's greatest conservation successes. By 2017, the global white rhinoceros population had more than doubled to around 18064 (after a post-1900 historical high of 20608 in 2012) (African Rhino Specialist Group (ARSG) but see CoP18 Agenda item 65 and documents under that item for a full status update from the ARSG).

South Africa continues to remain the stronghold for this species, with smaller populations established through reintroduction within its former range in Botswana, eSwatini, Mozambique, Namibia, Zambia and Zimbabwe and ex situ populations in Kenya and Uganda. The southern white rhinoceros was first reintroduced into Namibia in 1975 from Umfolozi Game Reserve, Natal, South Africa.

3.2 Habitat

The potential range for white rhinoceros is restricted by rainfall in Namibia as the species is not known to occur in areas with less than 200mm annual rainfall. It is conservatively estimated that Namibia has sufficient habitat to carry as many as 14000 white rhinoceros in the potential range for white rhinoceros in Namibia.

3.3 Biological characteristics

The white rhinoceros is the second largest terrestrial mammal in Africa by weight, and is a bulk grazer, obligate drinker, a relatively slowly reproducing with a long gestation period and it is a long-lived social species. It is so well known that no further information is provided.

3.4 Morphological characteristics

The white rhinoceros is reliably identified from other rhino species by amongst other features its large size and the square shape of its mouth (i.e. it is also called the square-lipped rhinoceros).

3.5 Role of the species in its ecosystem

White rhinoceros, being a mega herbivore, can transform high biomass, low productivity and low nutrient content vegetation communities into regenerating communities with a much greater production of better-quality plant types and tissues (Owen-Smith 1988). Specifically, white rhinoceros are important bulk grazers and perform the function of creating short "lawns" in grasslands favouring the smaller grazers e.g. antelopes and zebras. They also keep seasonal rain pans open by carrying mud out of them after wallowing. Wallowing by white rhinos seals the bottom of the pans and creates pools that last longer into the dry season for all animals to drink from. Their communal dung heaps (middens) are an important source of food for insectivorous birds and reptiles and breeding grounds for dung beetle species.

4. Status and trends

4.1 Habitat trends

White rhinoceros habitat in Namibia is limited only by the minimum suitable rainfall per annum. Apart from more than 1.5 million ha of white rhino habitat in three national parks currently occupied by white rhinos, an estimated additional 0.5 million to 1 million ha of habitat is available in national parks currently without white rhinos and which could be restocked in future. The proportion of the habitat outside protected areas above the 200mm rainfall isohyet that is managed for white rhinoceros and other wildlife production is directly dependent range on the comparative economic returns from such rhinoceros and other wildlife in relation to traditional forms of land use. Although it has been attractive enough to restock white rhinoceros over a large part of Namibia, the cost-benefit ratio has changed because the costs of providing security in the face of the risk of illegal killing are significantly higher than the current limited economic benefits from having rhinoceros on a piece of land.

4.2 Population size

Namibia holds the second largest white rhinoceros population in the world after South Africa. The population in 2017-2018 numbers 1037, based on aerial surveys (helicopter counts in national parks), records of known individuals derived from dehorning operations and annual information submitted by private owners to the Ministry of Environment and Tourism (verified by permit records of imports, sales, exports, hunting and periodic farm inspections by the Ministry of Environment and Tourism).

4.3 Population structure

Information on the relative age and sex structures of the populations in protected areas is available as such information is collected from a number of activities including helicopter censuses, dehorning operations and the routine monitoring systems in these parks (including the SMART system and remote camera surveillance). Many white rhinoceros are individually identifiable and are of known age and have been marked with ear notches, microchips, telemetry transmitters or RFID transponders. Rhinos in private ownership are all individually identifiable and are marked upon sale, import, translocation, and dehorning and/or occasional veterinary treatment – except juveniles in maternal groups. The latter are marked when they become independent and e.g. are captured to be sold or dehorned.

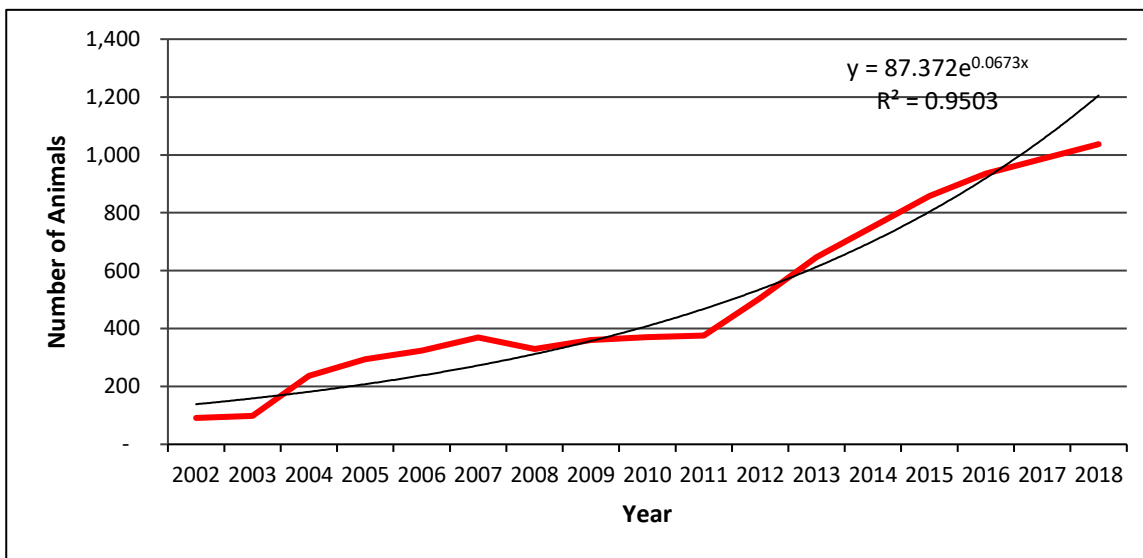
A detailed analysis of this information cannot be given per subpopulation and is not material to the proposal being made. Manipulating the age and sex structure of rhino populations is essential to reduce intraspecific mortalities and ensure optimal reproduction. Removal of socially dominant post reproductive males from especially the smaller populations is essential. Removal of excess adult males

to achieve a sex ratio skewed towards females result in faster breeding and population growth. Adjusting the population structure through selective removals is therefore a management strategy.

Applications for permits to sell or hunt are accompanied by information on the age and sex structure of that specific population at that time as the basis for decision-making. The large proportion of known individuals (virtually all adults and the majority of sub-adults) and thus also of known age and sex, facilitates fine scale management of such populations.

4.4 Population trends

The white rhinoceros population in Namibia has grown from the initial introduction of 16 animals in 1975 to the current national population of 1037. The growth rate in the population in the period 2002-2018 was 6.7% per annum, including imports from South Africa.



The majority of white rhinoceros in Namibia are privately owned with large numbers imported from South Africa since 2012. The current privately-owned population comprises 780 animals in around 70 populations. The State-owned population in 2018 comprises 267 animals in 3 protected areas.

4.5 Geographic trends

The distribution of the species is precisely known in Namibia as it was reintroduced to specific national parks and private land units. The import, export, translocation, sale and transport of white rhinos are subject to permit control, and all populations are thus known to the Ministry of Environment and Tourism. More specific information is not provided for security reasons. This species is being reintroduced continually to new areas in its former range and its geographic trend is a trend of expansion both in the number of sub-populations and the size of its range.

5. Threats

Illegal killing and illegal trade in rhinoceros products constitute the greatest threat to this species. Since 2012, Namibia has experienced an increase in losses of rhinoceros from illegal killing. A concerted effort is being made and will need to continue to be made to reverse the trend, in order to sustain population growth and maintain the economic, tourism, social and community value/benefits of rhinoceros. In this regard, penalties for illegal killing and illegal possession and trade in rhino products were drastically increased in 2017 (see section 7.1 below), along with improved interagency coordination and other operational measures.

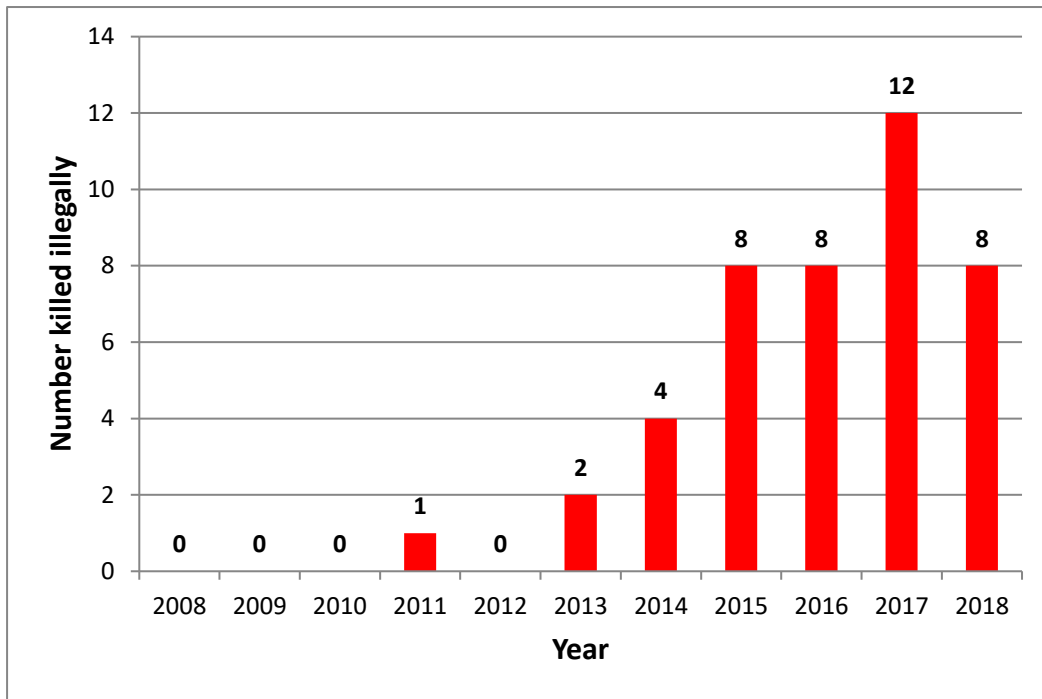


Figure 1. Incidences of illegal killing of white rhinoceroses from 2008 to 2018

The second most serious threat is that private owners will be forced to dispose of their white rhinos, which constitute the largest part of the Namibian population, if the costs of rhino protection cannot be offset by the available means of utilization of and trade in this species.

The costs of protection have and can be expected to continue escalating, increasingly making white rhinoceros a liability to conservation authorities, private and communal landowners. Existing benefit streams from tourism, limited trophy hunting and live sales of rhinoceros are not sufficient to offset these security costs.

Trade limitations reduce opportunities for government conservation departments and the private sector to generate much needed funding for conservation. Anti-poaching programmes are expensive, and their long-term effectiveness is threatened by declining budgets and sources of income.

6. Utilization and trade

6.1 National utilization

Domestic consumptive use of white rhinoceros and trade in rhinoceros horn and other products is currently not permitted in Namibia. Non-hunting tourism income from white rhinoceros is difficult to quantify. Revenues from tourism are not disaggregated to specify revenues derived from white rhinos.

6.2 Legal trade

From 2008 to 2018 a total of 57 white rhinoceroses were hunted, thus on average 5.2 per year. This amounts to 0.4-0.5% of the population, far below the rate of recruitment and overall population growth. Five white rhinos were hunted in 2018. A significant number of adult males are periodically dehorned which reduces the number that can be hunted in each year.

Demand for white rhinoceros from private farmers in Namibia is high. White rhinoceros continues to be imported from South Africa because of this demand and the greater availability of white rhinos in South Africa. Over the past 10 years, permits to import 508 white rhinos from South Africa were issued, with imports drastically increasing since 2012.

Although Namibia has exported 27 white rhinos from 2008 to 2018 to Angola, Cuba, the Democratic Republic of the Congo and South Africa the “primarily commercial purposes” restriction applying to Appendix I animals has severely limited Namibia’s ability to generate revenues for conservation. Transferring the population to Appendix II will create access to a far larger market for white rhinos.

6.3 Parts and derivatives in trade

The only parts in trade are hunting trophies, see 6.2.

6.4 Illegal trade

There are no records of seizures of white rhinoceros parts and derivatives from other countries in Namibia. Less than 43 sets of horns (43 white rhinoceros were illegally killed since 2008) may have entered trade since 2009 due to interdictions and arrests.

6.5 Actual or potential trade impacts

The current levels of exports of hunting trophies and live animals are at comparatively low levels and have had no impact on the overall population growth rate which was given in 4.4.

Transferring the population to Appendix II as proposed is likely to result in increased live exports. The sustainability of offtakes from individual populations is considered in the decision-making process regarding both hunting and live export applications.

Current levels of illegal trade are sustainable, see sections 5 and 4.4.

7. Legal instruments

7.1 National

White rhinoceros are classified as a "Specially Protected" species under the Nature Conservation Ordinance (Ordinance 4 of 1975), as amended, in Namibia. Hunting, capture, transport, being in possession, and trade (import, export, re-export), in raw ivory, live animals and other derivatives are subject to permits and conditions. Horns and all other parts of a white rhinoceros are classified as "Controlled Wildlife Products" under the Controlled Wildlife and Trade (Act 9 of 2008), as amended.

The maximum penalties for contraventions related to trade in Controlled Wildlife Products and hunting of specially protected species are N\$25 000 000 (approx. US\$1 780 000) and/or 25 years imprisonment.

On the basis of the Animal Health Act (Act 1 of 2011), the import and transit of raw wildlife products, including rhino horn 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.

7.2 International

The Namibian population of white rhinoceros is included in Appendix I of CITES.

8. Species management

8.1 Management measures

Namibia's White Rhinoceros Management Strategy (2018 and previous versions) provides for a metapopulation management approach. Effective metapopulation management of closed sub-populations relies on achieving genetic interchange through translocations and introductions. The general rule of thumb of one exchange of a breeding individual per population per generation length is far exceeded in Namibia.

The management strategy also includes the reintroduction of white rhinoceros into other suitable protected areas and other land to facilitate further increases in the national population and maintain or improve growth rates of individual populations.

Hunting for trophies (referred to as conservation hunting in Namibia) is recognized as a valuable management tool which provides much-needed revenue for rhinoceros conservation. Trade in live animals is similarly important for income generation in support of protection measures. Transferring the

population to Appendix II will enable Namibia to export live animals and hunting trophies to more countries and will increase revenue through sustainable use.

The *modus operandi* being utilised both locally and internationally in the illegal killing of rhinoceros and the smuggling of their horns in recent years clearly indicate the increasing involvement of highly organised and well-structured crime syndicates that are operating a lucrative international enterprise. This means that protection efforts will equally need to be scaled up, better organized and coordinated, pro-active, and focussed on shifting the 'front-line' away from the rhinoceros populations, with the aim of preventing illegal killing before it takes place. This will require a combination of appropriate management actions, improved legislation and sentences, cooperative wildlife crime-related intelligence, detection, effective investigation and prosecution, law enforcement and community support.

Preventing the theft of legally acquired horn and their leakage into the illegal market is also important and requires effective horn stockpile management. Private owners of rhino horn in Namibia are obliged to re-register such horn with the Ministry of Environment and Tourism annually. Horns in private ownership have primarily been acquired from natural mortalities and de-horning.

8.2 Population monitoring

The Ministry of Environment and Tourism is responsible for monitoring white rhinoceros in Namibia. Monitoring of rhinoceros and patrolling of their range are established management practices in all rhinoceros populations in Namibia, providing the basis for estimating population sizes and trends, and tracking breeding performance of individuals and populations. Monitoring also provides a valuable surveillance function, and serves to prevent illegal killing. Aerial patrols, waterhole counts using identification photographs and special anti-poaching units are used routinely for this purpose.

For all areas except Etosha National Park, rhinoceros monitoring is principally based on individual identification. The effectiveness of this method for use in population estimation is improved by ear-notching of most or the entire segment of the adult population without natural identifying features. High frequency monitoring and patrolling routines must be maintained for the foreseeable future for all unit populations, supplemented by indirect methods using incidences such as signs of rhinoceros presence.

In Etosha National Park, the use of sample aerial block counts was done initially using fixed wing aircraft, and since 2007 by helicopter. This method has proven effective, providing an estimate with confidence limits. Counts take place every second year.

The white rhinoceros population in the private sector is monitored through the State permitting system. Private owners only receive transport or hunting permits if the relevant individuals had been microchipped and DNA profiled with samples sent to the RhODIS database housed at Onderstepoort, South Africa. Private owners have their own monitoring systems and stud books.

8.3 Control measures

8.3.1 International

Permit control: The Ministry of Environment and Tourism permit office at Windhoek issues all permits relating to white rhinoceros and their parts or derivatives. No competencies are delegated to local or regional authorities. Only Namibia registered game dealers are allowed to capture and trade wild animals. In the case of hunting, only Namibian registered professional hunters and operators/outfitters are allowed to conduct hunting. The Directorate of Veterinary Services in Windhoek issues all veterinary permits. A strictly applied permit system thus already exists and the control of translocations, trade in live animals and hunting and trade in hunting trophies would continue to be strictly enforced.

Marking of animals/products: As is common practice already, and in the interest of facilitating control and law enforcement, any animal that is traded is required to be DNA profiled and microchipped. Hunting trophies are also required to be sampled for DNA profiling. DNA samples are submitted to the RhODIS database.

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.

Law enforcement: Law enforcement is a joint effort by the Ministry of Environment and Tourism, the Protected Resources Division of the Namibian Police and the Customs Service. Law enforcement agencies rely primarily on information and well-established informer networks exist and are maintained.

8.3.2 Domestic

Please also see section 8.3.1 above. In Namibia, white rhinoceros is classified as Specially Protected Game (wild animals) under the Nature Conservation Ordinance 4 of 1975 as amended, and any rhino (or any portion thereof), as well as any product derived from a white rhinoceros is classified as a Controlled Wildlife Product under the Controlled Wildlife Products and Trade Act (Act 9 of 2008) as amended. This means that permits are required to be in possession of white rhinos or their parts, and for utilization, movement, imports and exports. Ample control measures are thus in place to ensure sustainable use and management of the white rhinoceros population, and preventing illegal trade from impacting on the national population.

8.4 Captive breeding and artificial propagation

No captive breeding operations have been registered in Namibia.

8.5 Habitat conservation

Almost 17% of the land surface of Namibia has been placed in proclaimed protected areas, including approx. 30% of the potential habitat for white rhinoceros. A cornerstone of wildlife conservation philosophy in Namibia 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 white rhinoceros (and other wildlife) habitat outside protected areas, by providing people with appropriate incentives and benefits from sustainable utilization of wildlife populations. Altogether, about 46% of the land in Namibia is under conservation management or used for wildlife production comprising protected areas, communal conservancies (none of which hold white rhinoceros at present but of which a significant proportion could be restocked in future) and freehold land used for wildlife production and tourism. Few other countries have such a high proportion of wildlife habitat for large mammals under conservation management.

8.6 Safeguards

All populations transferred from Appendix I has to be first included in Appendix II (Resolution Conf. 9.24 (Rev. CoP17) Annex 4 Precautionary measure A.1.)). The scope of this proposal is limited to trade in live animals and hunting trophies only, which could be seen as a precautionary measure (Precautionary measure A.2.iii).

Extensive monitoring systems are in place and all forms of utilization and trade are subject to strict permit control. Significant penalties apply to infractions. There is an up to date national management strategy for this species.

9. Information on similar species

No other species traded as live animals are very similar to the white rhinoceros. White rhinoceros horns tend to have square bases compared to the round base of black rhino horns. Parts of horn are not readily distinguishable from the horns of other species of rhinoceros. Trade is not contemplated in anything except live animals or entire intact horns as hunting trophies (although hunters can apply to export the cranium, other skeletal material and the hide if they so wish). All live animals and hunting trophies to be exported are required to be marked as described already.

10. Consultations

The Association of private rhino owners in Namibia has been consulted and is in support of this proposal.

11. Additional remarks

Rationale for transfer to Appendix II

The Namibian white rhinoceros population is secure. The population does not meet the biological criteria for inclusion in Appendix I. The proposed transfer to Appendix II will not threaten the survival of the species in Namibia as the necessary control and enforcement measures are in place and have shown to be relatively successful in curbing illegal killing and illegal trade. Trade in live animals will only take place to appropriate and acceptable destinations therefore allowing Namibia to verify the destination. Trade in hunting trophies (as is already done) will enable the generation of income for conservation management and rhinoceros protection.

Namibia has an increasing population of white rhinoceros, the second largest population in the world after South Africa. Management enables the maintenance of optimal sex ratios, and the maintenance of maximum reproductive carrying capacity to ensure optimal population growth and optimum use of the habitat available to this species.

The increasing financial burden caused by the increase in the threat of illegal killing needs to be addressed through the sustainable use of white rhinoceros. In order for Namibia's private sector to be encouraged to participate meaningfully in the conservation of the white rhinoceros, an economically conducive climate needs to be created. The transfer of South Africa's population to Appendix II resulted in the rapid increase in live rhinoceros sale prices. The prices for Appendix I white rhinoceros in Namibia are lower than the South African prices because marketing opportunities are far more restricted. South African buyers will not pay Appendix II market-related prices for Appendix I animals due to the restrictions that apply to Appendix I animals. Namibian buyers will not pay Appendix II prices to acquire additional rhinoceros if they lose market value by such rhinoceros acquiring Appendix II status upon their import into Namibia. Namibia can thus not find sufficient markets for surplus live rhinoceros and encourage meaningful private sector participation in rhinoceros conservation in a commercially driven economy with the existing CITES Appendix I restrictions and conditions. If Namibia can encourage private sector participation in rhinoceros conservation as South Africa has so successfully done, the amount of habitat available to white rhinoceros and occupied by white rhinoceros can be vastly increased.

Namibia's conservation efforts in protected areas and other parts of the country have relied heavily on the sustainable utilization of wildlife resources and in the past the occasional sale of live rhinoceros has contributed meaningfully to funding conservation programmes.

Benefits of transferring the white rhinoceros population to Appendix II

- It would enhance Namibian owners and managers to effectively and pre-emptively manage populations, which is particularly important in the smaller protected areas and privately owned populations.
- The revenue derived from rhinoceros sales would go directly back into rhinoceros conservation and anti-poaching programmes as well as equipment, law enforcement, education, community initiatives, infrastructure and habitat management.
- Relaxation of restrictions and increased trade in live animals to appropriate and acceptable destinations, and the practice of trophy hunting as management tools would lead to more habitat becoming available to breeding rhinoceros through a reduction in population and social densities and to an increase of their reproduction rates. This is in line with the recommendations of the African Rhinoceros Specialist Group and the Rhinoceros Management Group.

Conservation benefit of trade

Utilization, whether through live sales, trophy hunting or game viewing, confers a real value on rhinoceros as a renewable resource and, when properly controlled, actively encourages conservation (t'Sas-Rolfes 1990). A survey by Buys (1988) indicated that the majority of the populations on private land in South Africa were subjected to some form of legal utilization. Namibia's rhinoceros populations are also subjected to limited sustainable utilization.

Funds from the sale of rhinoceros and trophy hunting are desperately needed to support Namibia's conservation efforts. Such funds would be used to maintain or improve the conservation management programmes on which the various rhinoceros species depend. Law enforcement, including anti-poaching and intelligence activities, is extremely expensive, and is unlikely, on its own, to succeed in the long term without the whole-hearted support of the local communities (Brooks & Hughes, 1993).

Funds from the sale of rhinoceros and trophy hunting are also needed for neighbourhood programmes which involve identifying the development and educational needs of the less privileged communities surrounding game reserves, and providing material support following consultation with local leaders. Such benefits encourage park neighbours to support wildlife conservation and the protection of rhinoceros populations in particular. This support is considered critical to the long-term survival of the species in the region.

In addition, private landowners will be encouraged through the acceptance of this proposal to invest in rhinoceros populations and protect them as sustainable, utilizable, economic assets.

Conclusions

The split-listing of the white rhinoceros population (the populations of South Africa and eSwatini are already included in Appendix II) had an adverse effect on other populations in Appendix I. The conservation commitment, achievements and abilities of Namibia has been more than adequately demonstrated over the past 43 years, in having successfully restored this species to Namibia after it became extinct in the late 19th century.

Namibia fully supports every effort at all levels to stamp out the illegal trade in rhinoceros products and has pledged its full cooperation with all involved in such actions. At the international level, Namibia has made strenuous efforts to stop illegal trade and has been successful in reducing illegal killing by half in the last 2 years in Namibia.

This proposal therefore is simply a downlisting proposal, with no consequential actions being implemented other than to facilitate the trade in live animals to appropriate and acceptable destinations, and legally hunted trophies which in turn will enhance the conservation of the species and its habitat.

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