CONVENTION ON INTERNATIONAL TRADE IN ENDANGERED SPECIES OF WILD FAUNA AND FLORA
CITES
Eleventh Meeting of the Conference of the Parties (COP11)
(Nairobi, Kenya, 10 to 20 April 2000)
Amendment to Appendix II

A. PROPOSAL

To maintain the Namibian population of the African elephant (*Loxodonta africana*) on Appendix II.

To amend the 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 and leather goods,
d. trade in registered stocks of raw ivory (whole tusks and pieces) of Namibian origin owned by the Government of the Republic of Namibia for commercial purposes, 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 Res. Conf. 10.10 concerning domestic manufacturing and trade, and subject to a maximum annual quota of 2000 kg ivory.

Rationale

- 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.
- Revenue from regulated trade is used exclusively for elephant conservation and community conservation and development programmes within the elephant range.
- Controlled ivory trade will directly benefit the survival of the Namibian elephant population, by making elephants valuable to the communities with which they share resources outside protected areas.
- Namibia's elephant population is increasing, and must be considered secure and viable.
- There are high financial and security implications involved with the storing of ivory stocks, and ivory from natural mortalities is continuously being accumulated.
- Namibia has 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 has contributed to the development of a rigorous international trade control system for raw ivory and has successfully conducted an experimental export of raw ivory in 1999 within that system. This export trade was successful in all respects and took place in complete isolation from any possible illegal trade out of other parts of Africa and to other parts of Asia than respectively, Namibia and Japan. This trade was conducted transparently and under intense international supervision. Namibia considers that there can be no fair justification for any new conditionalities being imposed concerning future trade. Much more is required than speculative assertions about the supposed impact of rigorously controlled legal trade on elephant populations elsewhere when there are far more important proximate causes concerning

the protection of such populations that have to be addressed at the national level in many range States. Namibia has acted within its sovereign rights as a Party to CITES and expects that its needs will continue to be accommodated by this Convention.

- Namibia urges other elephant range States to make progress in strengthening national legislation; enforcing national hunting and domestic trade prohibitions; controlling domestic ivory markets; registering national ivory stocks; complying with reporting systems established by CITES for illegal hunting of elephants and illegal trade in elephant products; and to take part in international monitoring systems that were designed to provide objective information about the status of elephant populations and their conservation.

Precautions/conditions for quota

- Namibia agrees to abide by all the conditions previously set out in Decision 10.1 and to operate in accordance with Resolution Conf. 10.10.

B. PROPONENT

Namibia

C. SUPPORTING STATEMENT[1]

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:	African elephant, Elephant d'Afrique, Elefante africana
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 (Ansell 1974, De Villiers & Kok 1984, Rookmaker 1989, Skead 1980, Vedder 1938, Viljoen 1987). Currently, elephants are found in a continuous zone across northern Namibia but much of this range is infrequently used (Fig. 1). Elephants in Namibia are migratory-nomadic and depend on their mobility to exploit favourable opportunities over a very large range (Lindeque & Lindeque 1991). They typically have distinct dry season ranges and much larger wet season dispersal areas (estimated at over 100000km^2). 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 has significantly increased

[1]Please refer also to proposal 10.20 submitted by Namibia to CoP10, for more background information.

during this century, through the development of the protected area network and by the provision of surface water in addition to existing springs. In September 1999, Cabinet approved the proclamation of a further approx. 80 km^2 of critical elephant dry-season habitat on the Kwando river (as part of the new Bwabwata National Park in the Caprivi).

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. 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 16820 km^2 of land within the elephant range outside protected areas now consists of proclaimed communal conservancies, and approximately 14000 km^2 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 in Botswana. Amongst the highest known elephant densities in Africa have been recorded on both sides of the Linyanti and Chobe river systems in Namibia and Botswana over the past decade and elephants are still free to move in this region of optimal elephant habitat.

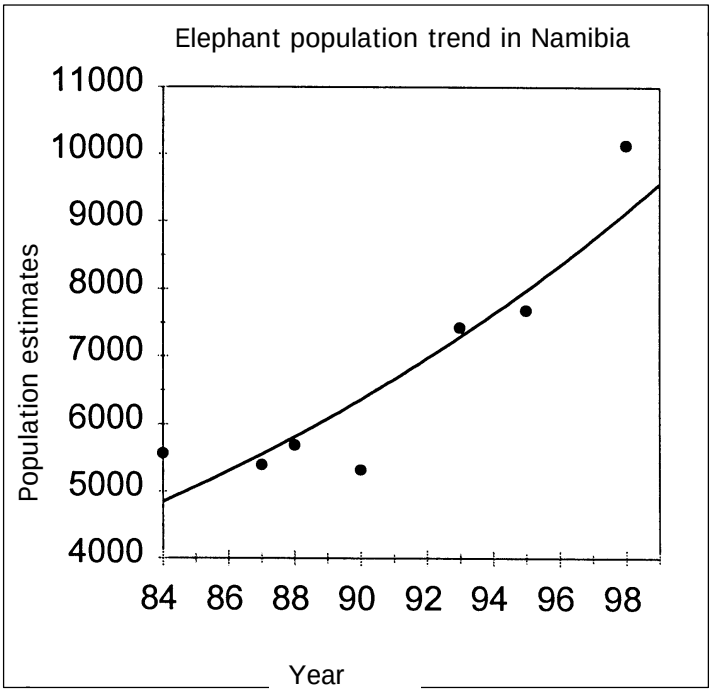
A limited number of elephants in Namibia also occur on suitable privately owned commercial land. The importance of elephants in tourism enterprises is well recognized and it can be expected that increasing numbers of elephants will be established on game ranches and commercial conservancies in future. There is also a tendency towards wildlife based tourism ventures on commercial farms bordering Etosha N.P., and therefore more tolerance to elephants moving onto this land from the park. In fact, one of these operations has recently offered to accommodate a herd of elephants consisting of approximately 14 individuals which are causing problems on farmland further south.

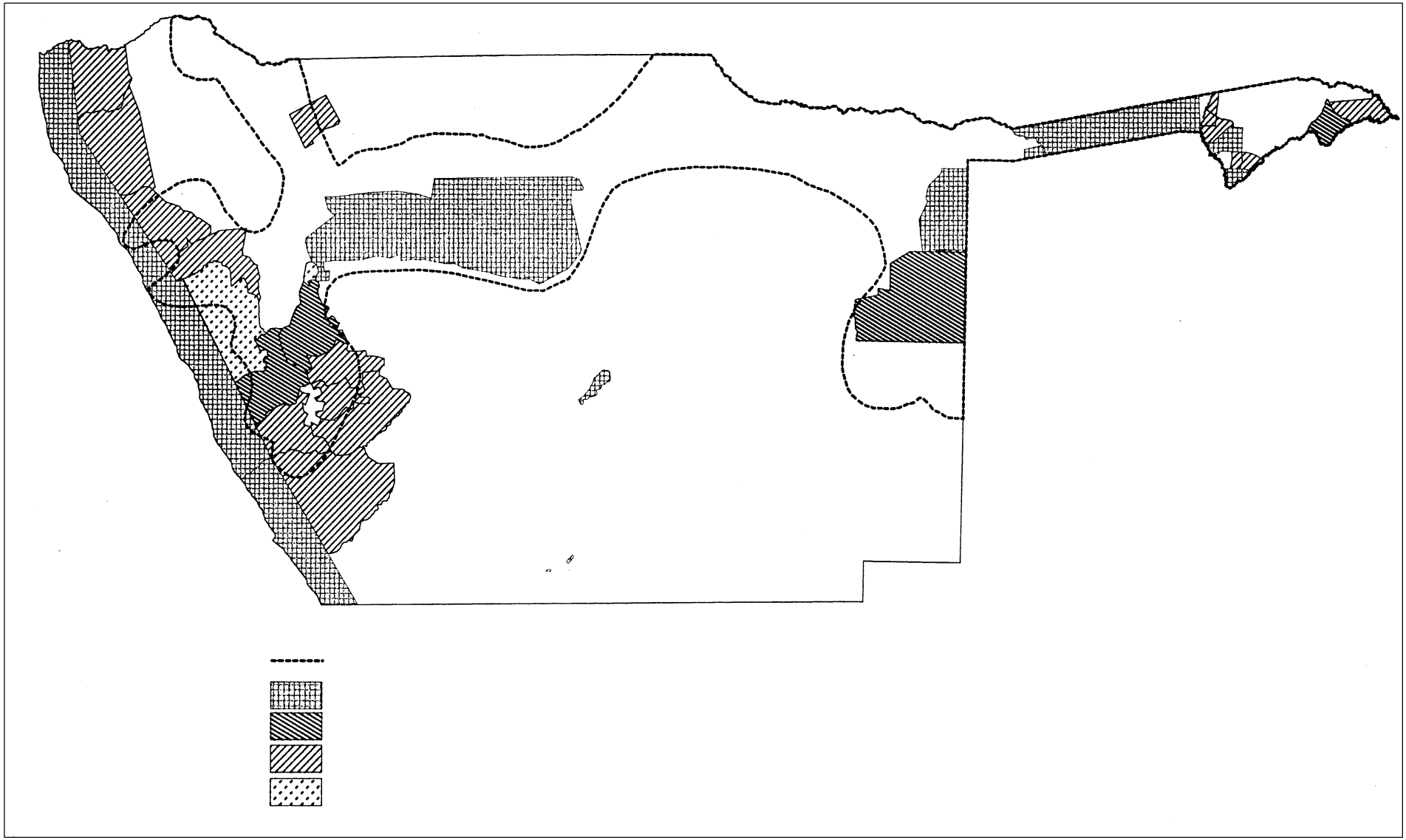
2.3 Population status

The most recent estimate of the size of the Namibian elephant population was obtained as part of an aerial survey of northern Namibia which covered 355267 km^2, and was conducted during the period August-November 1998 (Craig 1999). This survey was based on standardized sample counting techniques (Norton-Griffiths 1978; Gasaway *et al.* 1986). The estimate produced was the highest estimate of elephants in Namibia to date (10137 $\pm$ 2002), and confirms that the Namibian elephant population has continued to increase and should be considered secure and viable.

2.4 Population trends

The figure shows the elephant population trend in Namibia since 1984 based on aerial surveys and estimates derived from partial aerial and ground surveys. The exponential curve fitted is significant (df 5, t=4.76, p<0.01). The estimated annual rate of increase, obtained from the regression, is 4.5% ±2.4%. Although survey methods have changed and developed with time, it must be noted that the estimates of 1990, 1995 and 1998 are all based on similar sample aerial surveys, and these comparable surveys alone show a clear upwards trend in the elephant population within Namibia.





Map of northern Namibia showing the elephant range, protected areas, registered and emerging communal conservancies

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 this century, with elephants expanding into previously unused or rarely used parts of the Kunene region. Elephants have in the past 5-10 years recolonized the Ehomba mountain range area (Lindeque & Lindeque 1991, Ministry of Environment and Tourism (MET) data) (population recorded as extinct by Viljoen 1987), other parts of the Opuwo region, the Ugab River-Brandberg area, the Twyfelfontein area, the Khowarib Schlucht area and the southeastern corner (Uukwaluudhi) of the Kunene region, as well as the western part of the Omusati region (MET data). The Etosha N.P. population dates back only to 1950, while the population in Khaudom Game Reserve - Tsumkwe district (former Bushmanland) was founded in the early 1970s (MET data).

The range available to elephants is also expanding southwards onto privately owned land and game farms where the only restriction at the moment is the stringent fencing requirements before elephants can be reintroduced onto game farms or private nature reserves, as well as the availability of elephants for translocation. The emergence of large communal land conservancies within permanent and original elephant range has also 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 which is of greater importance at present than their broader ecological role in ecosystems shared with people (O'Connell 1995, Jacobsohn 1996). Conflicts between people and elephants over water have severely increased this decade, and will become the most serious area of conflict in future. The incidence of elephants recorded as wounded seems to be increasing, which is interpreted as a sign that people are reverting to extreme measures to deter elephants. This situation, can, however, be counteracted if elephants are perceived to have value to these same communities living with them. (For more background information please refer to Prop. 10.20).

2.7 Threats

Although there are no immediate threats to the Namibian elephant population, and illegal killing incidences have remained low (see Annex 1), there are some potential long-term threats. Elephant habitat in Namibia is prone to serious periodic droughts and is arid or semi-arid in general, and as such, drought-related mortalities will periodically occur, particularly in the younger age classes (Lindeque 1991a,b). The Namibian elephant population has nevertheless managed to increase throughout this century despite arid conditions and the trans-African drought of the early 1980s. 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 vital movement corridors, as would only be possible if they are not seen as incompatible with farming practises. If communities are not able to benefit from the presence of elephants through sustainable utilization, and through trade in ivory recovered from natural mortalities, however, elephants <u>outside</u> protected areas in Namibia face a serious long-term threat of displacement through progressive range conversion to subsistence agriculture. The approximately 50000km^2 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 km^2, and will serve as dry season refugia for elephants that use land outside protected areas.

There is thus no evidence that the Namibian elephant population is anything but viable, and the fact that this population has been recovering throughout this century in semi-arid habitat indicates its resilience.

3. Utilization and Trade

3.1 National utilization

Namibia has not exploited elephant directly for their products either 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, or will be killed specifically to obtain the ivory for any commercial purpose. 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 takeoff through sport hunting at present should not exceed approximately 50 per year for the present population estimate. 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 eg. taxidermists etc. In fact, the actual exports were 23 (46 tusks) in 1997 and 31 (62 tusks) in 1998.

Elephant hide and related products: Namibia currently does not routinely recover elephant hides from the few cases when elephants are destroyed for management reasons (eg. problem animal control), due to the lack of suitable storage facilities, and the current inability to market hide. The only hide collected is 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 maximise benefits which can be re-invested into elephant conservation. The number of hides collected in this respect would average less than 20 per year, unless it becomes necessary to embark on a population control program for management purposes, in which case this number could increase.

Ivory stocks: The current status (as of 12 November 1999) of the Namibian ivory stocks is summarized in the following table, which obviously excludes the 12367 kg eventually exported as part of the experimental trade quota in April 1999.

Origin	Description	Total number	Total weight (kg)	Mean weight (kg)
Natural and Management	Whole tusks	319	2177.27	6.83
	Ivory pieces	659	1172.55	1.78
Seized	Whole tusks	4915	29830.29	6.07
	Ivory pieces	131	321.78	2.46
Unknown	Whole tusks	189	1117.29	5.91
	Ivory pieces	566	334.77	0.59
Total	**Whole tusks**	**5423**	**33124.85**	**6.11**
	Ivory pieces	**1356**	**1829.10**	**1.35**
GRAND TOTAL		**6779**	**34953.95**	

Since 9 January 1997, when Namibia declared the ivory stocks which were sold in terms of Decision 10.1 in 1999, a further 2177.27 kg of raw ivory (319 whole tusks) has been accumulated. There is also 1172.55 kg of raw ivory pieces (which originate from natural breakages) available (none of this was offered during the experimental trade). Taking a mortality rate of between 1-5% per annum, and an average tusk weight of 5

kg, ivory stockpiles should increase, using Namibian data, by approximately 100-500kg per 1000 elephants in the standing population per year - excluding ivory confiscated and seized. With the population estimate of 10000, therefore, an accumulation of 1000-5000 kg per annum could 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 MET and the Namibian Police (Protected Resources Unit) for ivory handed in by the public, which must represent a significant portion of elephant mortalities on communal lands.

All seized and/or confiscated tusks are separately stored, with many 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 U$70500 per year (based on a cost of U$10000 for the hire of suitable premises, U$50000 for a two person/24 hour police presence throughout the year, U$500 for the maintenance of security and humidifying equipment, U$10000 for MET staff salaries for 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 in terms of lost potential revenue. The international conservation community has to take cognisance of this situation and the predicament 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 recognisable. Namibia undertakes to provide CITES with a complete inventory of all stocks of raw ivory each year, before 31 January, as required by Resolution 10.10.

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 12367 kg to Japan. In its report to the 42nd 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 (a verification mission to confirm this aspect in Namibia was conducted on 2 November 1999). In this respect, a guideline of 50% of the revenue is being allocated to conservancies within the elephant range, to assist communities to deal with elephant management issues (including water supply, fencing, protection of crops etc). The rest of the revenue is being used specifically for supporting improvements in the monitoring, conservation and protection of the elephant population in Namibia, including Namibia's contribution towards the monitoring of the illegal killing of elephants under the MIKE (Monitoring of the Illegal Killing of Elephants) program.

3.3 Illegal trade

Illegal trade resulting from illegal hunting in Namibia as well as the southern African region is low. No elephant has been hunted illegally within Etosha N.P. for 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 more recently implemented the MIKE system (Monitoring of Illegal Killing of Elephants) at its allocated site/s, with the intention of eventually implementing this rigorous monitoring system throughout the elephant range in Namibia.

The incidence of seizures of ivory in Namibia, as communicated also to CITES 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 and the remarkable efficiency of a police unit (PRU) with decades of experience in managing informer networks to curb the illegal diamond trade (Bradley-Martin 1993). The number of seizures have, nonetheless, declined in the past two years, and most tusks seized appear to be several years old. The incidence of seizures is irrevocable proof that the illegal trade in ivory has persisted despite the ban.

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 the 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 the monitoring of the impact of trade will be supported.

Trade in registered existing stocks of ivory cannot be said to pose a threat to elephant populations, unless it would be possible for illegal ivory to be entered into the existing stockpile, in the complete absence of competent international supervision or precautionary measures - and also assuming a scale of corruption unheard of in Namibia or southern Africa. Ivory stocks will be registered annually with the CITES Secretariat, and source documentation will be available for inspection, if and when required.

3.5 Captive breeding or artificial propagation for commercial purposes

Please refer to proposal submitted to CoP10 (Prop. 10.20)

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 N$200000 (approx. US$35000) 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).

Namibia is a signatory of the Southern African Convention for Wildlife Management (SACWM). The aim of this convention is to formalize the expansion of the exceptional level of cooperation which has developed among the former SACIM (Southern African Centre for Ivory Marketing) member states, to other fields of wildlife management and conservation and other members of the Southern African Development Community (SADC). Furthermore, the SADC Protocol on Wildlife Conservation and Law Enforcement, with the primary objective of establishing common approaches to the conservation and sustainable use of wildlife resources, and to assist with enforcement of laws governing such resource, has been adopted and signed at the 1999 Summit of the SADC Heads of State.

4.2 Species management

4.2.1 Population monitoring

The Ministry of Environment and Tourism 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 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. It is envisaged that approximately 30% of the revenue that will be generated from trade would be invested in elephant monitoring and management programs, which will make it possible to conduct more frequent aerial surveys of the entire range.

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 <u>outside</u> 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 (currently comprised of 311 MET staff within the elephant range dedicated specifically to anti-poaching, as well as all other field personnel whose duties also include monitoring and law enforcement).

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: All permits relating to elephants or elephant derivatives are issued by the MET permit office at Windhoek. No competencies are delegated to local or regional authorities. (All veterinary permits are issued by the Directorate of Veterinary Services's offices at Windhoek).

Marking of ivory: All ivory is marked in accordance with Res. 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. Effective law enforcement is also attributed for the fact that Namibia has been the first (if not only) African country that has managed to halt a full scale rhino poaching onslaught (1989-1991), whereas in other places rhino populations have been reduced to very low levels once they have become the focus of illegal hunting operations. Namibia is regarded as having been the most effective of all rhino range states in prosecuting people for rhino mortalities recorded since the early 1980s (Bradley-Martin 1993). 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 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 Res. 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 centre. 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 Res. Conf. 10.10 concerning domestic manufacturing and trade. 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

Most of paragraphs 4.1.1, 4.2.1, 4.2.2, 4.2.3 and 4.3.1 apply here also, with reference to 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

Please refer to proposal submitted to CoP10 (Prop. 10.20)

6. Other comments

Not applicable, as only the population of Namibia is involved in the proposal.

7. Additional Remarks

7.1 Namibia complies with CITES

Namibia has tried to make a constructive contribution to CITES and to clarify several issues concerning natural resource management that it believes to be important to wildlife producing countries in the developing world. It has attempted to implement the provisions of CITES as far as possible within the limits of resources available to the Management Authority and national wildlife management and conservation agency (MET). Namibia has not been listed on any CITES infractions report ever, and has despite occasional unavoidable delays, submitted all required reports and returns, and has paid its contributions in full. Namibia has similarly tried to make a positive contribution through its representation on the Standing Committee, first as alternate member for the Africa region from 1992-1994, and subsequently as one of three regional representatives for Africa. The extent of its participation in all CITES activities and fora has been limited only by constraints on resources. Namibia is in the process of consolidating and updating environmental legislation. The CITES Secretariat has been provided with a detailed proposal on Namibia's CITES implementation policy and draft regulation on CITES implementation.

7.2 Namibia is committed to contributing to monitoring systems

Namibia has contributed to the interim reporting system for illegal killing and illegal trade in elephant products, and has implemented the MIKE monitoring system, bearing all its own costs in this regard.

7.3 Unilateral statement by Namibia concerning trade in raw ivory

Precautions: 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, culling, recovery of ivory fragments from natural breakages) will be included in the export quota of a maximum of 2000 kg ivory per annum.

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. Safeguards against abuse: The protocol for up-listing the elephant population, as described in Doc. SC41.6.4 (Rev. 2), remains in place.

e. 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 Division: Specialist Support Services of the Ministry of Environment and Tourism (MET) as the CITES Management Authority in Namibia.

f. 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 Res. Conf. 10.10 concerning domestic manufacturing and trade.

g. 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 store rooms under the control of MET will be guaranteed to the CITES Secretariat.

h. 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, assisting conservancies and regional wildlife councils.

i. Monitoring of the effects of the downlisting: Namibia will continue to cooperate with neighbouring countries and with the CITES Secretariat in the monitoring of elephant population trends and illegal trade.

7.4 Concluding statement by Namibia

The continued controlled trade of raw ivory for commercial purposes by Namibia is justified because:

a. Trade is in the best interest of the Namibian elephant population, to ensure continued access to land outside protected areas, through providing strong incentives to communities to protect elephants and their habitat.

b. The Namibian elephant population has continued to increase, and habitat availability in the country is also increasing. The Namibian population of *Loxodonta africana* therefore clearly fits the criteria for an Appendix II listing allowing for regulated trade, which in this case is achieved through the setting of an annual quota and a strict set of control mechanisms, as set in Dec. 10.1 and Res. Conf. 10.10. (The Namibian elephant population clearly does not fit the criteria for an Appendix I listing, as outlined in Res. Conf. 9.24).

c. The Dec. 10.1 trade control framework was designed to prevent any introduction of illegal ivory into the export quota, and there is no credible source that has been able to successfully argue that this has not been achieved. Indeed, the Secretariat verified that it had not occurred in its report to the Standing Committee, which was accepted at SC42 (SC42.10.2.1).

d. Namibia has complied fully with Dec. 10.1 and has cooperated fully with the Standing Committee and the Secretariat and has accepted any and all requirements established concerning the trade in raw ivory and has contributed to all of the monitoring procedures on illegal killing and trade devised by the Standing Committee and the Secretariat. As such, Namibia cannot accept any unfounded and unverified claims made by countries who have not been equally willing to contribute to these protocols.

e. It is as impossible now than ever before to claim a linkage between alleged illegal hunting and trade, and the resumption of a highly controlled legal trade. Namibia has complied with all conditions set and has managed ivory responsibly as an important natural resource, and should therefore not be held hostage to unproven speculation, or the inability of other countries to manage and protect their own natural resources. Only the Namibian population of *Loxodonta africana* is included in this

proposal.

f. Namibia cannot accept that it should be penalized when it is common knowledge that ivory is still traded in large quantities in many African countries, and when other range States have not made the required progress to improve their national legislation, declare their ivory stocks and control domestic manufacturing and international trade to tourists

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ANNEX 1 National Reporting Form on the Illegal Killing of Elephants

Country: **NAMIBIA**

		National wildlife conservation authority		Other conservation authorities		
Reporting period	Total no. elephants killed illegally	Total budget (N$)	Area of mandate km^2	Total budget	Area of mandate	Donor supp
1990	6	No data	840000	None	None	Yes
1991	1	16201400	840000	None	None	Yes
1992	6	19836980	840000	None	None	Yes
1993	10	25886000	840000	None	None	Yes
1994	7	29847000	840000	None	None	Yes
1995	6	32307000	840000	None	None	Yes
1996	11	38462000	840000	None	None	Yes
1997 Jan-Jun	2	48630000	840000	None	None	Yes
1997 Jul-Dec	2		840000	None	None	Yes
1998 Jan-Jun	2	49285000	840000	None	None	Yes
1998 Jul-Dec	2		840000	None	None	Yes
1999 Jan-Jun	5	115077762	840000	None	None	Yes
1999 Jul-Oct	1		840000	None	None	Yes

National wildlife conservation authority: **Ministry of Environment and Tourism**
Other conservation authorities: **None**
Donors providing support: **USFWS, EU (ELESMAP), 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**

ANNEX 2 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 (Jan-Oct)	17	71	4.18	389.15	22.89