

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



Seventeenth meeting of the Conference of the Parties
Johannesburg (South Africa), 24 September – 5 October 2016

CONSIDERATION OF PROPOSALS FOR AMENDMENT OF APPENDICES I AND II

A. Proposal

To delete the annotation to the listing of the Namibian African elephant population in Appendix II by deleting any reference to Namibia in that Annotation.

B. Proponent

Namibia*:

C. Supporting statement

Currently, the Namibian elephant population is listed in Appendix II with an annotation contained in Annex I of this document. Namibia, with this proposal, seeks the removal of this annotation in its entirety in respect of our elephant population. This can be achieved by deleting any reference to “Namibia” in the annotation.

This annotation in sub-paragraph h) states that “no further proposals to allow trade in elephant ivory from populations already in Appendix II shall be submitted to the Conference of the Parties for the period from CoP14 and ending nine years from the date of the single sale of ivory that is to take place in accordance with provisions in paragraphs g) i), g) ii), g) iii), g) vi) and g) vii). In addition such further proposals shall be dealt with in accordance with Decisions 14.77 and 14.78 (Rev. CoP15).”

Decision 14.77 requires that “The Standing Committee, assisted by the Secretariat, shall propose for approval at the least at the 16th meeting of the Conference of the Parties a decision-making mechanism for a process of trade in ivory under the auspices of the Conference of the Parties.”

This Decision formed part of an amendment to Proposal CoP14 Prop 4 and related draft Decisions (CoP14 Inf. 61) adopted at the 14th meeting of the Conference of the Parties to CITES [CoP14 Plenary 6 (Rev. 1)] that was a compromise that included an agreement by Botswana, Namibia, South Africa and Zimbabwe to a nine-year moratorium and the development of the African Elephant Action Plan.

As elaborated in document CoP17 Doc. 84.3, Decision-making mechanism for a process of international trade in ivory, submitted by Namibia, South Africa and Zimbabwe, in nine years, no substantive progress has been made in the implementation of this Decision. There is no substantive proposal that will be considered at the 17th meeting of the Conference of the Parties as far as Namibia is aware of other than the proposal submitted by Namibia, South Africa and Zimbabwe in CoP17 Doc. 84.3.

The establishment of a Decision Making Mechanism for a process of future trade in ivory was an integral part of the compromise reached that was incorporated in an amendment to Proposal CoP14 Prop 4 and related draft Decisions (CoP14 Inf. 61) adopted at the 14th CoP to CITES [CoP14 Plenary 6 (Rev. 1)] that further included an agreement by Botswana, Namibia, South Africa and Zimbabwe to a nine-year moratorium and the development of the African Elephant Action Plan.

* *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.*

Namibia contends that a failure to establish this Decision Making Mechanism within the agreed process and time frame significantly undermines the needs and interests of the affected range States including Namibia and their conservation objectives and programmes, which rely on:

- a) the creation of positive incentives for landholders, whether communal or private, and to set land aside for elephants and to co-exist with them instead of opting for forms of land use that would displace elephants and cause the loss of their habitat; and
- b) the generation of revenues from the sale of elephant products to finance elephant conservation programmes, including the management of protected areas and the combatting of illegal killing and trade.

The current situation negatively affects African elephant range States, including Namibia, and therefore runs counter to the letter and spirit of previous agreements made and decisions taken by the Conference of the Parties and infringes upon the legitimate rights of Parties enshrined in the text of the Convention.

Namibia supported the drafting of the annotation as part of a compromise that would result in an objective process regarding future trade in ivory that should not repeatedly have to be discussed by the Conference of the Parties in the manner that characterized such debates in the past. Namibia's African elephant population does not meet the criteria to be listed in Appendix I and compromises reached to address the needs of other range States, while foregoing our own, should be honoured. This will ensure that specific provisions that form part of the compromise are implemented and would not render the annotation inoperable.

If the 17th meeting of the Conference of the Parties does not approve a Decision Making Mechanism, the proponents of this document would consider the current annotation, negotiated as a compromise at COP14 and subsequently not implemented, as *pro non scripto* (as though it had not been written).

Namibia furthermore agrees with Zimbabwe in Proposal CoP17 15 that "Resolution Conf.11.21 (Rev.CoP16) makes the distinction between annotations for reference purposes and substantive annotations. The latter are generally used to qualify the permitted extent of trade in Appendix II species. An examination of Fauna listed on Appendix II suggests that most of the annotations are 'enabling' – that is, they permit trade (constrained by quotas) in situations where the remainder of range States' populations is listed on Appendix I (e.g. vicuña and crocodiles). The annotation for *Loxodonta africana* is entirely different. It is a long list of proscriptions constraining the trade in elephant specimens."

In light of the failure to honour the compromise, Namibia would not consider herself bound by any annotation that exceeds in scope the purpose of clarification and which adds trade-restricting provisions that are not provided in the text of the Convention.

In acceding to CITES in 1992, Namibia ratified the text of the Convention. The present annotation pertaining to its elephant population on Appendix II has departed a long way from Article IV of the treaty. In our view, the annotation is *ultra vires*.

Namibia, with this proposal, wishes to establish a regular form of controlled trade in all elephant specimens, including ivory, in support of elephant conservation, including community-based conservation and the maintenance of elephant habitat. Revenue from regulated trade will, as previously, be managed through a trust fund and used exclusively for elephant conservation and community conservation and development programmes within the elephant range.

Conservation and management of Namibia's elephants: The Namibian elephant population is secure and growing, and the availability of habitat for elephants is increasing. Our conservation model has enabled the expansion of the elephant population from just over 7500 in 1995 to over 20,000 at present. The biggest potential long-term 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. 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 the level of illegal killing is not detrimental to our elephant population. Controlled trade in ivory and other elephant specimens, 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 and 2008: Namibia fully complied with every requirement imposed by the Conference of the Parties, the Standing Committee and the CITES Secretariat concerning the trade in raw ivory in 1999 and 2008. Namibia contributed to the development of a rigorous international trade control system for raw ivory and successfully exported raw ivory in 1999 and 2008 within that system. These export trades were successful in all respects, and were conducted transparently and under intense international supervision. Namibia demonstrated with this trade of ivory to Japan and China in 1999 and 2008 that all necessary trade controls are in place. It has a functional trust fund under parliamentary supervision for the distribution of trade revenues, all of which are earmarked for conservation. The implementation of Decision 10.1 proved that, with adequate controls and strict enforcement measures, ivory can be traded legally, in such a way as to prevent any ivory other than registered legal stocks from entering such legal trade.

Commitment to other CITES requirements concerning elephant conservation: Namibia has complied with every requirement of CITES concerning the conservation of the African elephant. Namibia continues to exercise strict control over all ivory stocks, but remains concerned over the high costs and security implications of 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 16th year.

Fundamental rights of Namibia within CITES and the role of 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. In disregard of the remedial mechanisms within CITES concerning cases of unsustainable trade in Appendix-II-listed species, such as the significant trade process or the transfer of a population to Appendix I, the Conference of the Parties has on previous occasions imposed 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 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.

Frustrating the legitimate objectives of a Party concerning a proposed trade that complies in all respects with the provisions of the Convention through an unjustifiable and unwarranted delay in executing an action agreed by the Conference of the Parties within the specified time frame, i.e. the establishment of the decision-making framework, cannot be accepted.

1. Taxonomy

- | | |
|--------------------------|---|
| 1.1 Class: | Mammalia |
| 1.2 Order: | Proboscidea |
| 1.3 Family: | Elephantidae |
| 1.4 Species: | <i>Loxodonta africana</i> (Blumenbach, 1797) |
| 1.5 Scientific synonyms: | None |
| 1.6 Common names: | English: African elephant
French: Elephant d'Afrique
Spanish: 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 comparatively low densities throughout Namibia, wherever surface water could be found during the dry season and at highly variable densities over larger areas during past wet seasons. Currently, elephants are found in a continuous zone across northern Namibia, 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 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 elephant range outside protected areas falls within the category of communal land principally used for subsistence farming. In this regard, 82 communal land conservancies have been registered with several more emerging (see Fig. 1). In 2004 when Namibia last proposed an amendment to the listing of her elephant population, this number was 31, indicating the tremendous growth in our community based natural resource management programme. Communal conservancies are formed with the primary reason of benefiting communities from the sustainable utilization of natural resources. More than 100 000 km² (35 000 km² in 2004) 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.

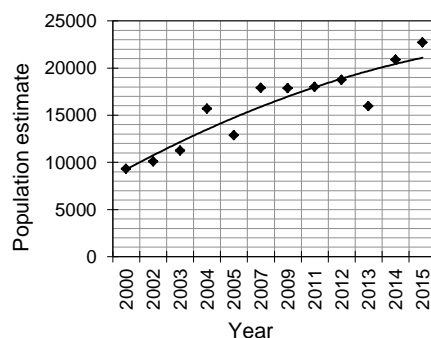
2.3 Populations status

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.

Area	Year of latest estimate	Estimated elephant population
North-East Parks and surrounding areas	2015	13 136
Khaudom National Park	2015	4 150
Nyae-Nyae Conservancy	2015	2 263
Kunene Region	2009	352
Etosha National Park	2015	2 810
Total		

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 2000 based on aerial surveys. Estimates since 2000 are all based on similar sample aerial surveys. The current estimate is the highest ever recorded in Namibia.



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, Erongo, Kavango East and Kavango West regions. The population of Etosha N.P. dates back only to 1950, while the population in Khaudom National Park-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 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.

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 basis 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 agriculture.

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 previously traded 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 level of sport hunting is largely determined by the 0.5% of standing population guideline (Martin 1986). MET has established a national annual export quota through CITES of 90 trophy hunted elephants per year (180 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 43 (86 tusks) in 2000, 34 (68 tusks) in 2001, 33 (66 tusks) in 2002, 48 (96 tusks) in 2003, 43 (86) in 2004, 48 (96) in 2005, 32 (64) in 2006, 20 (40) in 2007, 81 (162) in 2008, 25 (50) in 2009, 90 (180) in 2010, 48 (96) in 2011, 63 (126) in 2012, 67 (132) in 2013, 52 (104) in 2014 and 53 (106) in 2015.

Leather and hair goods: Namibia currently routinely recover elephant hides from the few cases when elephants are destroyed for management reasons (e.g. problem animal control), as well as from trophy-hunted animals, to maximize benefits that can be re-invested into elephant conservation.

Ivory stocks: The current status (as of 26 April 2016) of the Namibian ivory stocks is summarized in the following table, where natural and management origin refers to ivory obtained from natural mortalities, or from management related practices (i.e. of legal, Namibian origin); seized origin refers to ivory recovered through seizures (i.e. of illegal origin) and unknown refers to items for which no documentation is available:

Origin	Description	Total number	Total weight (kg)	Mean weight (kg)
Natural and Management	Whole tusks	2 638	18 703.15	7.08
	Ivory pieces	1 745	3 222.02	1.85
Sub-total			21 925.17	
Seized	Whole tusks	5 459	34 552.73	6.34
	Ivory pieces	322	985.32	3.06
Unknown	Whole tusks	215	1 348.68	6.27
	Ivory pieces	62	70.72	1.14
Total	Whole tusks	8 312	54 604.56	
	Ivory pieces	2 129	4 272.74	
GRAND TOTAL			58 877.30	

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.), and will continue this practice in future years.

The Namibian ivory stock is growing by 4.5% per year, on average.

3.2 Legal international trade

Namibia conducted legal international trade in ivory since 1985, in 1999 and 2008, as a highly regulated export of 19,870 kg to Japan and China in total. On both occasions the CITES Secretariat confirmed that the trade had taken place successfully, and that there was full compliance with all precautionary undertakings. The revenue obtained from the auctions was deposited in a Trust Fund established through an Act of Parliament, and was used exclusively for projects that benefit elephant conservation directly and to support rural conservation programmes.

3.3 Illegal trade

The incidence of illegal killing of elephants in Namibia is biologically insignificant (Annex 2). 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 3. 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.

3.4 Actual or potential trade impacts

Namibia sees the absence of trade as the greatest threat to elephant populations, 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

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, 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. Ivory and all other parts of an elephant are classified as "Controlled Wildlife Products" under the Controlled Wildlife and Trade Act 9 of

2008. The maximum penalty for contraventions related to trade in Controlled Wildlife Products is N\$200 000 (approx. US\$13 989) and/or 20 years imprisonment. It is worth noting that we are currently in the process to amend our legislation to increase the fine to N\$10 000 000 (approx US\$699 300) and/or 40 years imprisonment. On the basis of the Animal Health Act (Act 1 of 2011), 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. Analogous to the IUCN criteria, the Namibian elephant population would fit into the category of Least Concern. According to the IUCN criteria the continental population has a higher status of Vulnerable.

4.2 Species management

4.2.1 Population monitoring

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

4.2.2 Habitat conservation

Almost 17% 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 Namibia and other southern African countries is that habitat loss, not trade, ultimately threatens all wildlife outside protected areas, and indirectly also a substantial portion of wildlife inside those areas - unless wildlife becomes more valuable than the land use systems that are threatening to replace them. The entire focus is therefore aimed at protecting elephant (and other wildlife) habitat outside protected areas, by providing people with appropriate incentives and benefits from sustainable utilization of wildlife populations. Concerning elephants, the major forms of resource use will be the selling of trophy 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 Ministry of Environment and Tourism with approved management plans where the requirement that resources are sustainably used is emphasized. Conservancies have to be registered with MET and are supported by MET in wildlife management and utilization, especially concerning population monitoring, quota determination, management plans, marketing and general training.

4.3 Control measures

4.3.1 International trade

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

Marking of ivory: All ivory is marked in accordance with Resolution Conf. 10.10, and the marks are 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 trades of ivory in 1999 and 2008.

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

Trade controls for raw ivory: Only the Namibian population is included in this proposal. All specimens for export will have been individually marked in accordance with Resolution Conf. 10.10. All other ivory will also be individually marked and registered with the CITES Secretariat to ensure that there can be no mixing of unknown or foreign ivory. All revenue from ivory sales will be used exclusively for elephant conservation and community development and conservation programmes. Namibia will cooperate with neighboring 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 Resolution Conf. 10.10.

Trade controls for hides and leather goods: Possession, manufacturing and trade in all elephant specimens are regulated in Namibia. Persons or companies wishing to manufacture or trade elephant hide 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 and 4.3.1 regarding control 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

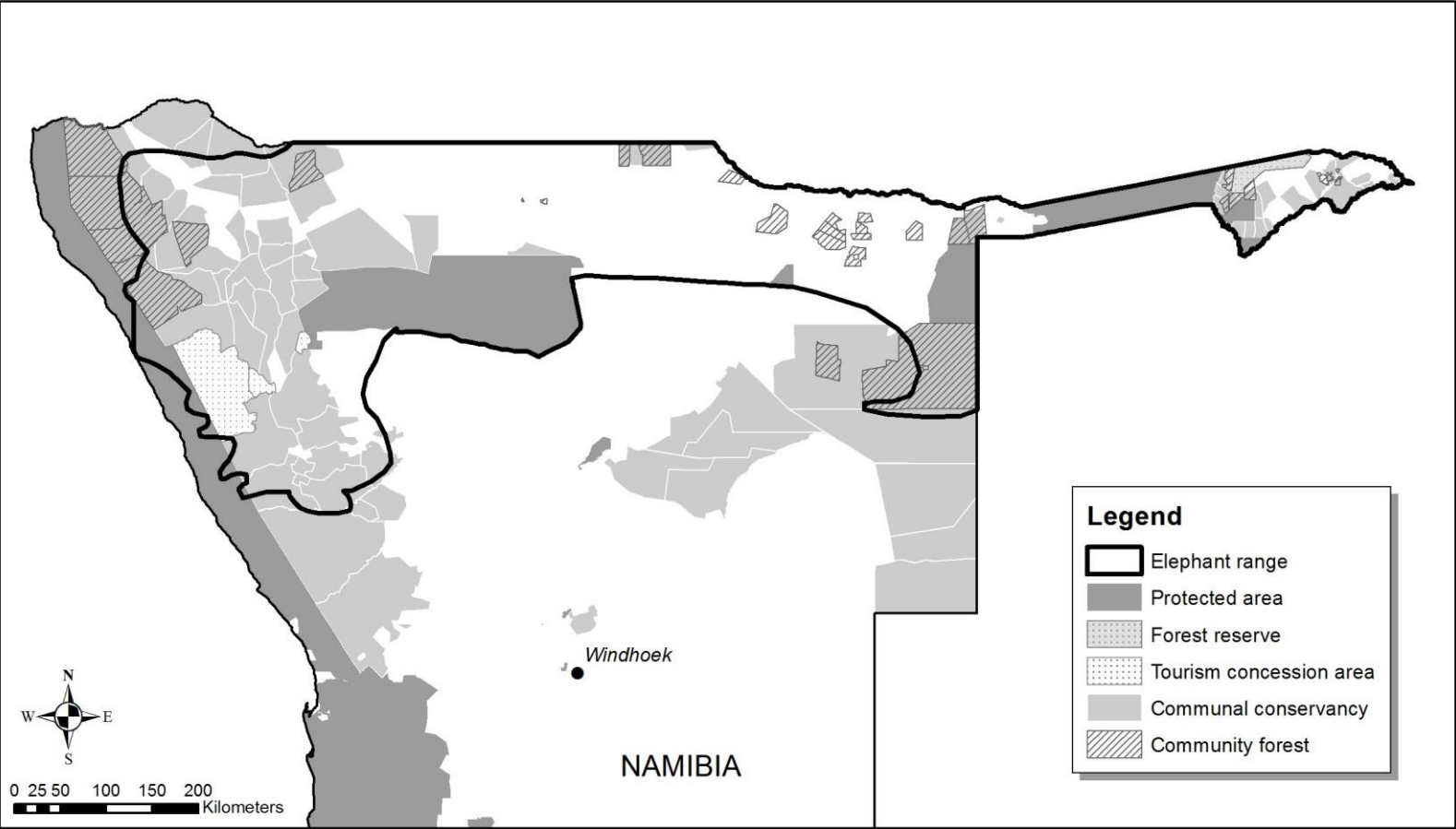
Not applicable.

6. References

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



Annotation on the CITES Appendices applying to the elephant populations of Botswana, Namibia, South Africa and Zimbabwe (listed in Appendix II)

“For the exclusive purpose of allowing:

- a) trade in hunting trophies for non-commercial purposes;
- b) trade in live animals to appropriate and acceptable destinations, as defined in Resolution Conf. 11.20, for Botswana and Zimbabwe and for *in situ* conservation programmes for Namibia and South Africa; c) trade in hides;
- d) trade in hair;
- e) trade in leather goods for commercial or non-commercial purposes for Botswana, Namibia and South Africa and for non-commercial purposes for Zimbabwe;
- f) trade in individually marked and certified ekipas incorporated in finished jewellery for non-commercial purposes for Namibia and ivory carvings for non-commercial purposes for Zimbabwe;
- g) trade in registered raw ivory (for Botswana, Namibia, South Africa and Zimbabwe, whole tusks and pieces) subject to the following:
 - i) only registered government-owned stocks, originating in the State (excluding seized ivory and ivory of unknown origin);
 - ii) only to trading partners that have been verified by the Secretariat, in consultation with the Standing Committee, to have sufficient national legislation and domestic trade controls to ensure that the imported ivory will not be re-exported and will be managed in accordance with all requirements of Resolution Conf. 10.10 (Rev. CoP16) concerning domestic manufacturing and trade;
 - iii) not before the Secretariat has verified the prospective importing countries and the registered government-owned stocks;
 - iv) raw ivory pursuant to the conditional sale of registered government-owned ivory stocks agreed at CoP12, which are 20,000 kg (Botswana), 10,000 kg (Namibia) and 30,000 kg (South Africa);
 - v) in addition to the quantities agreed at CoP12, government-owned ivory from Botswana, Namibia, South Africa and Zimbabwe registered by 31 January 2007 and verified by the Secretariat may be traded and despatched, with the ivory in paragraph g) iv) above, in a single sale per destination under strict supervision of the Secretariat;
 - vi) the proceeds of the trade are used exclusively for elephant conservation and community conservation and development programmes within or adjacent to the elephant range; and
 - vii) the additional quantities specified in paragraph g) v) above shall be traded only after the Standing Committee has agreed that the above conditions have been met; and
- h) no further proposals to allow trade in elephant ivory from populations already in Appendix II shall be submitted to the Conference of the Parties for the period from CoP14 and ending nine years from the date of the single sale of ivory that is to take place in accordance with provisions in paragraphs g) i), g) ii), g) iii), g) vi) and g) vii). In addition such further proposals shall be dealt with in accordance with Decisions 14.77 and 14.78 (Rev. CoP15).

On a proposal from the Secretariat, the Standing Committee can decide to cause this trade to cease partially or completely in the event of non-compliance by exporting or importing countries, or in the case of proven detrimental impacts of the trade on other elephant populations.

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

Number of elephants killed illegally in Namibia: 1999-current

Year	Total no. of elephants killed illegally
1990	6
1991	1
1992	6
1993	10
1994	7
1995	6
1996	11
1997	4
1998	4
1999	12
2000	2
2001	2
2002	5
2003	7
2004	0
2005	1
2006	0
2007	0
2008	0
2009	0
2010	0
2011	1
2012	78
2013	38
2014	78
2015	49
2016 (until 24 April)	9

Summary of ivory seizures in Namibia: 1984-2015

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	4.10	309.40	30.90
2004	13	22	1.69	125.67	9.67
2005	12	20	1.67	154.20	12.85
2006	4	23	5.75	102.60	25.65
2007	9	17	1.89	108.10	12.01
2008	10	68	6.80	316.45	31.65
2009	27	48	1.78	25.50	0.94
2010	13	38	2.92	166.85	12.83
2011	29	94	3.24	616.07	21.24
2012	22	64	2.91	459.85	20.90
2013	34	163	4.79	1518.68	44.67
2014	22	56	2.55	720.55	32.75
2015	18	57	3.17	405.00	22.50

