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Your Excellencies, Honourable Minister,

We the undersigned are writing respectfully to express our grave concerns relating to proposals to offer live elephants for commercial sale from regions of Namibia, where they are reported to be overpopulated, affected by drought, and/or in conflict with local people.

According to a tender notice posted by the Ministry of Environment, Forestry and Tourism (MEFT) in The Namibian in December 2020, as many as 170 live elephants, including adult males and family groups, are being offered for sale from the Omatjete area, Kamanjab commercial farming area, Grootfontein-Kavango Cattle Ranch area and Grootfontein-Tsumkwe area.

The proposed sales will not achieve the stated objectives of controlling populations or reducing human-elephant conflict. Moreover, the capture and relocation of elephants could have extremely deleterious impacts on the health and welfare of the individuals concerned, the stability of their wider societies, and the health of the ecosystems of which they are an integral part.

Animal welfare, social stability and human-elephant conflict

Elephants are sentient and highly intelligent animals with complex social lives. Young elephants are heavily reliant on their mothers for a long period. They also have very strong relationships with their female relatives and the wider herd - relationships that are imperative for socialisation processes and learning opportunities, as well as protection and bringing up of the next generation. Males typically remain with their natal herds until they are 12-15 years old although achieving independence from their herds is a long, drawn out process and they may continue to socialise with their families for many years. Contrary to commonly held beliefs that males are solitary, they are highly social throughout their lives, often forming male-only groups. Females stay with their natal herds for the rest of their lives.

When removed from their herds, individual elephants, or even small family groups, can suffer extreme stress, particularly if they are transferred to captive environments.ⁱ Believing there to be no

direct benefit for *in situ* conservation of African elephants, the African Elephant Specialist Group of the International Union for the Conservation of Nature (IUCN) Species Survival Commission (SSC) does not endorse the removal of African elephants from the wild for any captive use.ⁱⁱ

The removal of individuals or groups from established herds may also have implications for the remainder of the herd, and can lead to behavioural changes which may in turn increase the likelihood of conflict with people.ⁱⁱⁱ Researchers have concluded that translocation of elephants can cause wider propagation and intensification of human-elephant conflict, and increased elephant mortality, thus defeating both human-elephant co-existence and elephant conservation goals.^{iv} The long period of maternal dependency in elephants enables a period of learning that is now recognised as cultural transmission of knowledge and traditions important for survival; the translocation of elephants from the habitat in which they grew up is therefore deleterious to their survival in extreme weather events such as drought.

A number of strategies have been developed for mitigating human-elephant conflict. Those strategies avoid removing individual elephants or family groups from populations.^v The IUCN SSC African Elephant Specialist Group's Human-Elephant Conflict Working Group provides a number of strategies and recommendations aimed at addressing human-elephant conflict.^{vi} We urge the Namibian authorities to ensure that all efforts have been made to implement appropriate and humane mitigation strategies in the areas concerned, in preference to the removal of elephants from the population.

Population considerations

The tender suggests that up to 170 elephants are to be offered for sale.

The 2016 IUCN SSC African Elephant Specialist Group Status Report^{vii} estimated Namibia's elephant population at 22,754. Namibia declined to participate in the Great Elephant Census, a coordinated multi-country programme that surveyed savannah African elephant populations and provided some of the data for the Status Report. The 2016 estimate is nearly the same as the estimate reported in the Namibian media in 2020, despite a claimed annual population growth rate in excess of 5 percent.^{viii} The scientific basis for this claimed growth rate is unclear, and the results of an August 2019 aerial survey of elephants in the north-east of the country have yet to be released. It should also be noted that the estimates for Namibia are likely to include animals in transboundary populations which regularly move between Namibia, Angola, Zambia and Botswana.

Namibia has claimed significant recent success in conserving its elephants (which include elephants that have uniquely adapted to desert conditions), with reports that the population has tripled since the country gained independence in 1990, a period which has seen elephant populations plummet in other parts of Africa. These claims of unique achievement overlook the movement of elephants into Namibia from neighbouring Angola and, particularly, Botswana; in the latter elephants have increased and spread steadily westwards across its northern region since the 1960s

The 170 elephants offered for sale would represent just 0.75 percent of the 2016 Status Report's country-wide population estimate. Consequently, it is difficult to comprehend how the sale of these elephants, which could well represent some of the last remaining free-roaming elephants among the communal farming areas of north-western and north-eastern Namibia, will materially impact any perceived overpopulation, or significantly mitigate the impacts of drought. In addition, elephants are widely distributed over the areas identified, and the bases for claims of overpopulation are unjustified.

International regulations and sale to captive facilities

Namibia's elephant population is listed on Appendix II of the Convention on International Trade in Endangered Species of Wild Fauna and Flora (CITES), subject to an annotation which restricts live exports from Namibia to *in situ* conservation programmes. However, in 2012 and 2013, Namibia exported 24 wild-caught elephants to captive facilities in Mexico (18) and Cuba (6). The exports were conducted pursuant to trade requirements for an Appendix I species, in spite of Namibia's elephants being listed in Appendix II. In May 2017, Namibia issued CITES permits to export 5 young elephants to Dubai Safari in the United Arab Emirates, again subject to Appendix I listing requirements. The sale was reportedly abandoned by the Namibian Ministry of Environment after capture but prior to transportation because the seller of the elephants had not met the regulations for capture and transportation.^{ix} These exports clearly seek to circumvent the restrictions placed on Namibia by the annotation to the Appendix II CITES listing of its elephants, and disrespect the intention of international agreements which restrict the export of live elephants from Namibia to *in situ* conservation programmes.

It is imperative that Namibia abides by internationally agreed restrictions on exports of live elephants, and desists from permitting the export of live wild-caught elephants to captive facilities under any circumstances.

The value of elephants

The sale of live elephants, or parts and products derived from them, has been promoted as a means of generating income for conservation purposes or for the benefit of communities, despite little, if any, evidence of such income or providing such benefits. In addition, these considerations overlook the wider value of wild elephants to human society. Estimates published in 2014 suggested that, over its lifetime, an individual elephant may be worth as much as \$1.6 million in ecotourism revenue.^x Media reports have suggested that tourists may already be considering boycotting Namibia if elephants are captured for sale. More recent studies published by the International Monetary Fund (IMF) highlight the value of elephants in sequestering carbon over their lifetime (\$1.75 million per elephant for forest elephants).^{xi} These values must be evaluated when considering strategies for managing elephant populations.

Conclusion

In light of the above, we urge the Namibian authorities to withdraw the tender notice and work with international experts to identify and implement solutions to perceived overpopulation, human-elephant conflict, and drought, which avoid the forced removal of elephants from their family groups and wider ecosystems. The Managing Director of the IMF recently encouraged countries to include their nation's natural capital in their balance sheets^{xii}, so a request to the IMF for technical assistance in calculating the ecosystem services attributable to elephants would likely change the economic rationale for this sale.

As organisations and individuals with considerable collective experience in elephant conservation and welfare, we stand ready to provide advice and assistance to the Namibian authorities if requested.

Thank you for your consideration of this important matter.

Sincerely

Owais Awan

Environmental Lawyer – Islamabad

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Links and references:

ⁱ <https://cites.org/sites/default/files/eng/com/sc/69/inf/E-SC69-Inf-36.pdf>

ⁱⁱ <https://www.iucn.org/ssc-groups/mammals/african-elephant-specialist-group/afesg-statements/removal-african-elephants-captive-use>

ⁱⁱⁱ Allen et al. 2020. Importance of old bulls: leaders and followers in collective movements of all-male groups in African savannah elephants (*Loxodonta africana*). Nature: Scientific Reports.

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^{iv} Fernando et al. 2012. Problem-Elephant Translocation: Translocating the Problem and the Elephant?

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^{vi} <https://www.iucn.org/ssc-groups/mammals/african-elephant-specialist-group/human-elephant-conflict>

^{vii} <https://www.iucn.org/content/african-elephant-status-report-2016-update-african-elephant-database>

^{viii} <https://www.namibiansun.com/news/namibia-to-sell-170-elephants-2020-12-04>

^{ix} <https://cites.org/sites/default/files/eng/com/ac/31/Docs/E-AC31-18-02.pdf>

^x <https://blogs.scientificamerican.com/extinction-countdown/elephants-are-worth-76-times-more-alive-than-dead-report/>

^{xi} <https://www.imf.org/external/pubs/ft/fandd/2020/09/how-african-elephants-fight-climate-change-ralph-chami.htm>

^{xii} IMF Director Kristalina Georgieva speaking on the debt for nature swap and Natural Capital:

<https://www.paulsoninstitute.org/events/live-virtual-event-financing-nature-closing-the-biodiversity-financing-gap/>