

To delete the Annotation to the listing of the Namibian African Elephant *Loxodonta africana* population in Appendix II by deleting any reference to Namibia in that Annotation

Proponent: Namibia

Note: See Background to the African Elephant proposals for a history of the African Elephant under CITES.

Summary: The Namibian population of the African Elephant was transferred from Appendix I to Appendix II in 1997; it is currently covered by annotation 6. The proponent (Namibia) wishes to delete reference to Namibia in that annotation so that the African Elephant population of Namibia will be in Appendix II with no annotation. Namibia aims to establish a regular form of controlled trade in all elephant specimens from Namibia, including ivory, in support of elephant conservation, including community-based conservation and the maintenance of elephant habitat. The Supporting Statement indicates that revenue from regulated trade will be managed through a trust fund and used exclusively for elephant conservation and community conservation and development programmes within the elephant range.

The most comprehensive and reliable information on African Elephant distribution and population is contained in the African Elephant Database (AED), maintained by the IUCN/SSC African Elephant Specialist Group¹. The 2013 version gives the range in Namibia as just under 150,000km² (the Supporting Statement indicates that African Elephants have a dispersed, wet season range in Namibia of over 100,000km²)¹. The most recent population data available in the AED are from the end of 2013. These along with figures from 2002 and 2006 are presented here divided into 'definite', 'probable', 'possible'. The database is being updated with the most recent data available, and a full version will be available at CoP17. Permission has been granted to use in the IUCN/TRAFFIC Analyses of Proposals the most recent figures from Namibia. Because of differences in survey techniques and extent of coverage, figures for different years are not strictly comparable. The most recent data are presented in the form in which they have been submitted to the AED and therefore a total estimate is not given. Data for Namibia's population of elephants from the African Elephant Database^{1,2} are:

2002 – 7769 definite, 1872 probable and 1872 possible;
 2006 – 12,531 definite, 3276 probable and 3296 possible;
 2013 – 13,684 definite, 2871 probable and 2891 possible;

More recent data are:

Survey Area	Year	Estimate	Source
Etosha National Park	2015	2,911 +/- 697	Kilian, 2015
Khaudm National Park & Neighbouring Conservancies	2015	6,413 +/- 2,566	Gibson & Craig, 2015a
Kunene	2011	314 +/- 154	MET, 2012
Mangetti Game Reserve	2014	67	F. Weiss, pers. comm., 2014
Zambezi Region	2015	13,136 +/- 3435	Gibson & Craig, 2015b

The Supporting Statement provides an estimated total of 22,711, all based on 2015 estimates other than that for the Kunene Region (352, based on a 2009 estimate).

The Supporting Statement outlines management measures for African Elephants in Namibia and enforcement controls and compliance with CITES. It indicates that no elephants have been, or will be, killed specifically to obtain ivory or other products for commercial 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. It indicates that the level of sport hunting is largely determined by a guideline of 0.5% of the standing population. A national export of 90 trophy hunted specimens per year has been established, to allow for the possibility that the tusks of elephants hunted in one year may be exported the following year. On average 49 trophies (98 tusks) have been exported each year in 2000 to 2015.

The Supporting Statement notes that a computer database of all specimens in storage is maintained with source documentation, and all specimens are marked so as to make them individually recognisable. The annex to CoP17 Doc. 57.5 (Report on the Elephant Trade Information System (ETIS)) notes that Namibia is one of only three CITES Parties (along with Congo and Zimbabwe) to have submitted ivory stock reports with inventory figures in 2015.

Information on the number of elephants recorded as illegally killed in Namibia, and on ivory seizures, is included as annexes to the Supporting Statement.

CoP17 Doc. 57.5 (Report on Monitoring the Illegal Killing of Elephants (MIKE)) contains the most up-to-date synthesised information on illegal killing of elephants, based on information from 2003 until the end of 2015. It reports on the proportion of illegally killed elephants (PIKE) at 58 sites in 30 countries in Africa and 27 sites in 13 countries in Asia. A PIKE of 0.5 or lower is generally considered sustainable. In its analysis of sub-regional trends in Africa, the report observes (para 14) that the southern African sub-region (Angola, Botswana, Malawi, Mozambique, Namibia, South Africa, Swaziland, Zambia, Zimbabwe) is the only one of the four African sub-regions where the estimated PIKE has not exceeded the 0.5 level in the period 2003 to 2015. MIKE data are usually not considered meaningful at national level because of small sample sizes.

The annex to CoP17 Doc. 57.5 presents an analysis of illegal ivory trade, based on data in ETIS. Part of this is a cluster analysis of 55 countries or territories divided into 13 groups with similar characteristics. Namibia forms part of group eight, along with Botswana and Zimbabwe. The report's analysis of this group is as follows:

“As in the CoP16 analysis, three of the four African Elephant range States whose elephant populations were transferred to Appendix II in 1997 fall in the same group. These countries regularly report data to ETIS. In terms of all data which implicate these countries in an ivory seizure, this southern African grouping reflects middle range values in terms of mean number of seizures and the mean weight of ivory seized. The measure for assessing the presence of organised crime stands at zero which is indisputably a good sign. Governance indicators are mixed, however, with the rule of law score problematic and suggesting the presence of corruption, but the relatively high law enforcement ratio partially mitigates that concern. Indeed, as before, Zimbabwe is the country that pulls the rule of law score down, indicating far greater governance challenges exist in that country, but it is worth noting that Namibia's scores have also dropped too. The domestic ivory market score is low, reflecting the complete absence of a market in Botswana and a very low level of trade in Namibia. Again, Zimbabwe is the exception with the tenth largest ivory market of any country in this analysis.”

The Supporting Statement draws attention to the failure to implement Decision 14.77, concerning a decision-making mechanism for a process of trade in ivory, which is an integral part of annotation 6 covering the Appendix II African Elephant populations. It states that if such a mechanism is not approved at CoP17, Namibia will regard current annotation 6 as invalid.

Analysis: The Namibian population of African Elephant was transferred from Appendix I to Appendix II, under a series of constraints set out in an annotation (6). Acceptance of the current proposal would delete this annotation as it refers to Namibia. There are no explicit guidelines in *Res. Conf. 9.24 (Rev. CoP16)* as to how to deal with a proposal to amend or delete an annotation for an Appendix-II listed species. However, these constraints can be interpreted as special measures under the terms of the precautionary measures in Annex 4 of *Res. Conf. 9.24 (Rev. CoP16)*. It would be appropriate to examine whether these precautionary measures are still met under the proposed change.

The Namibian African Elephant population does not have a restricted range, is not small, and is not undergoing a marked decline. It does not therefore appear to meet the biological criteria for inclusion in Appendix I set out in Annex 1 of *Res. Conf. 9.24 (Rev. CoP16)*.

Regarding the further precautionary measures in Annex 4, the proposal should include a special measure (as envisaged in para A 2 a iii)) set out in the Supporting Statement. The Supporting Statement indicates that no African Elephants will be harvested for commercial trade. This may be interpreted as a special measure. The Parties would also need to be satisfied that appropriate enforcement controls and compliance with the requirements of the Convention are in place. Details of enforcement controls are set out in the

Supporting Statement. Information from ETIS and MIKE indicates that controls in place for the time periods analysed (up to 2014 for ETIS and 2015 for MIKE).

Sources for population estimates:

Gibson, D. S. C., & Craig, G. C. (2015a). Aerial Survey of Elephants & Other Wildlife in Khaudum National Park & Neighboring Conservancies: October 2015. Ministry of Environment & Tourism, Namibia.

Gibson, D. S. C., & Craig, G. C. (2015b). Aerial Survey of Elephants and Other Wildlife in Zambezi Region September/October 2015. WWF.

Kilian, J.W. (2015). Aerial Survey of Etosha National Park. Internal Report to the Ministry of Environment and Tourism: September 2015.

Ministry of Environment and Tourism. (2012). Countrywide survey of Elephants in Namibia. Namibia: Ministry of Environment and Tourism.

Weiss, F. (2014). Personal Communication: Information on the elephants of Mangetti. E-mail to C. Thouless, 11 August 2014.

Reviewers: D. Skinner and T. Milliken.

References:

The information not referenced in the Summary section is from the Supporting Statement.

¹ IUCN/SSC African Elephant Specialist Group (2013) Continental Totals Provisional African Elephant Population Estimates: update to 31 Dec 2013. http://www.elephantdatabase.org/preview_report/2013_africa_final/2013/Africa. Viewed on 5th July 2016.

² Blanc, J.J., Thouless, C.R., Hart, J.A., Dublin, H.T., Douglas-Hamilton, I., Craig, C.G. & Barnes, R.F.W. (2003) African Elephant Status Report 2002: An update from the African Elephant Database. IUCN/SSC African Elephant Specialist Group. IUCN, Gland, Switzerland and Cambridge, UK.