



REPUBLIC OF NAMIBIA

MINISTRY OF ENVIRONMENT AND TOURISM

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Governor Edmund G. Brown
c/o State Capitol, Suite 1173
Sacramento, CA 95814

Dear Governor E.G. Brown,

CONCERNS OVER THE ICONIC AFRICAN SPECIES PROTECTION BILL

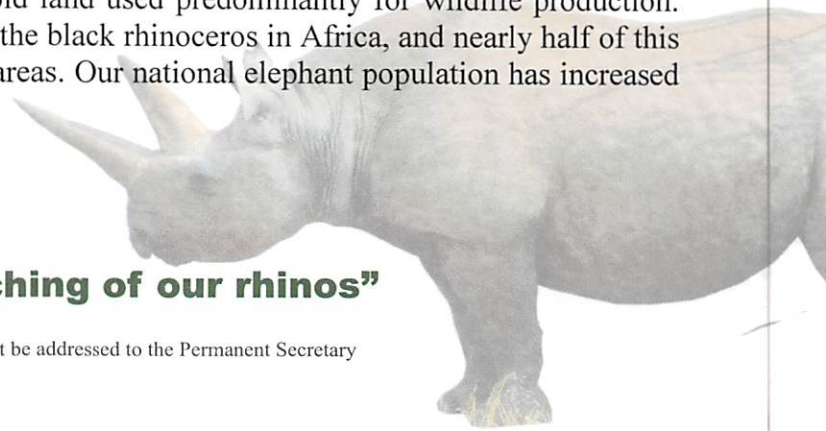
I am writing to you to express the concerns of the Ministry of Environment and Tourism on behalf of the Republic of Namibia regarding the Iconic African Species Protection Bill, which I hear is under the consideration of the Assembly Judiciary Committee of the State of California. My understanding is that the Bill is aiming at placing a ban on the importation of hunting trophies into your State.

Hunting is a crucial part of the biodiversity economy of Namibia and one of the most important mechanisms for the protection of wildlife habitat outside State protected areas. It is entirely false that other forms of tourism could replace hunting. Tourism works well and is a competitive form of land use in a few select areas that are generally photogenic and readily accessible. Much of Namibia does not fall in this category. Hunting involves a small number of people who do not require the high level of capital investment in accommodation and other infrastructure.

The issue therefore needs to be considered in the context of the use of land and the drivers for making decisions about such land. If wildlife through hunting, and in specific areas through tourism, cannot outperform other alternatives, land use will shift to agriculture on both our communal (State) lands and freehold farmland. Namibia has nearly four decades of experience with this matter and we have created strong incentives through the sustainable use of wildlife, including through hunting, for landholders to protect wildlife habitat and maintain populations. As the result, there are three times more wildlife on land outside State protected areas than within such areas. State protected areas cover 18% of the land surface of Namibia and a further 25% constitute communal (State) land and freehold land used predominantly for wildlife production. Namibia now holds the largest population of the black rhinoceros in Africa, and nearly half of this population occurs on land outside protected areas. Our national elephant population has increased

“Stop the poaching of our rhinos”

All official correspondence must be addressed to the Permanent Secretary



from 7500 animals in 1995 to over 20000. A large of these elephants occur outside State protected areas. Namibia has the largest populations of leopard, cheetah and giraffe in the world, again, most of these occur outside protected area. Namibia has the only increasing population of lions in Africa, with almost a quarter of the national population occurring outside State protected areas. Importantly, Namibia has, through the use of effective economic incentives, reversed the downward trend that characterizes wildlife populations in most other countries in Africa. This achievement will be undermined by the Bill under consideration.

It is important to understand that actions such a contemplated in the Iconic African Species Protection Bill will have a direct negative impact on the livelihoods of rural people, including marginalized communities of San and Himba people. Rural people were granted rights over wildlife through legislation and derive most of their income from hunting and secondly, from other forms of tourism. Some 7000 jobs were created though this programme which benefits nearly 20% of the Namibian population. Revenues from hunting and other forms of tourism also play an important part in rural development and livelihoods to offset the cost of living with dangerous wildlife such as lions and elephants.

The importance of trophy hunting in conservation is not only applicable to communal areas. About 80% of the numbers of the larger plains game species are found on freehold farmlands. Trophy hunting on freehold farmland has resulted in conversion of land use from pure livestock ranching to wildlife ranching or a combination of wildlife and livestock. Importantly, hunting operations on farmland employ double the number of permanent employees than livestock farms.

In the absence of trophy hunting, the values of game species will reduce to their meat value and private landowners will have to reduce their game numbers in order to increase cattle numbers in an attempt to substitute the loss of income. If trophy hunting is banned, private farmers will lose at least USD 27 million per annum in foreign currency, 50% of employment opportunities on cattle/trophy hunting operated farms will be lost and 100% on exclusive hunting operated farm, translating to over 1 300 jobs, on private farms only.

In conclusion, banning of import of trophies into the State of California will not only have a detrimental effect on wildlife conservation in Namibia (including the Iconic African Species it sets out to protect) but also on the livelihood of our local communities.

Finally, I wish to draw attention to the provisions of the Convention on International Trade in Endangered Species (CITES) to whom the United States of America is a party. This Convention provides, amongst others, for the use of stricter domestic measures that can be applied at national level, i.e. measures that are more restrictive on the import of species covered by CITES than what is agreed through the provisions of CITES. Such measures need to operate at national and not sub-national level. The introduction of import restrictions by the State of California would thus amount to violation of CITES. Further, Article III of the General Agreement on Trade and Tariffs 1947 of the World Trade Organization commits contracting parties, which include the United States of America, to providing national treatment, i.e. treatment no less favourable than the accorded to like products from other countries. It is likely that a measure restricting the import of hunting trophies in to California would be in violation of this requirement.

It is highly advisable to visit Namibia prior to taking any such restrictive measures and to experience our conservation programmes at first hand and to engage with the communities that will be affected by measures such as those being contemplated. We will be very pleased to facilitate such a visit.

Thank you very much for your understanding and should you need any further clarification, feel free to contact us.

Yours sincerely,



T. Nghitila

Acting Permanent Secretary

