

Via Electronic Delivery

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Honourable Representatives and Chairs,

URGENT OPEN LETTER

RE: EXPORT OF WILD CAUGHT DESERT ELEPHANTS FROM NAMIBIA TO THE UAE

The Pro Elephant Network (PREN) is an international community of diverse individuals and organizations, comprising specific expertise, from both western and eastern academies, on wild and captive elephants, including the fields of science, health, conservation, elephant welfare, economics, community leadership, social justice and the law.

Please find attached our correspondence to the Namibian CITES Authorities and to the CITES Secretariat and relevant CITES Committees in August and September 2021. Our correspondence clearly articulated Namibia's obligations under CITES and carefully pointed out the roles and responsibilities of CITES Secretariat, CITES Committees and the Member States which are signatories of the Convention.

Members of PREN have received reliable information that indicates that the selection and capture of wild elephant family groups in Namibia has already taken place and that the permits have in all likelihood been issued. The information further suggests that the elephants are in quarantine in preparation for export.

There is a distinct possibility that these elephants have been selected from a small and fragile population in the North-West of Namibia.

Furthermore, the information we have to hand is that a South African wildlife trader/broker is involved in this process and that the elephants are destined for two captive locations in the United Arab Emirates (UAE). The UAE does not have an *in situ* population of elephants. The UAE has already imported wild elephants from Namibia who are kept in captivity in Safari Parks and private zoos¹.

As the UAE CITES Management Authority should be aware, the export of live elephants from Namibia is restricted to *in situ* conservation programmes, by virtue of the annotation applied to the Appendix II listing of Namibia's population. Apart from the serious abrogation of CITES regulations, all captures of wild elephants for captive facilities are inherently cruel and do not contribute to conservation, according to IUCN AfESG; it is totally irresponsible and counter-intuitive to even consider capturing wild elephants especially during the hot months.

PREN scientists, conservationists and elephant experts have already stressed the impacts this sale will have and the implications on the conservation of this unique population which will be irreversibly and negatively affected by such destructive actions. Exporting wild caught elephants from Namibia in these circumstances will be detrimental to the species and population concerned, and as such we believe would be in further contravention of CITES regulations.

Also attached hereto, for your urgent attention and response is a Legal Opinion on this subject matter which finds that it would not be lawful for the Namibia CITES Management Authority to issue an export permit under either Appendix I or Appendix II of CITES and that, similarly, it would not be lawful for a country outside of the range states for *Loxodonta Africana* to issue an import permit.

For all the aforementioned reasons, we call on the governments of Namibia and the UAE to urgently halt this transaction.

Yours Sincerely,



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SIGNING MEMBERS:

¹ [New elephants at Emirates Park Zoo | Time Out Abu Dhabi](#)

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