



Via Electronic Delivery

Her Excellency Mariam Bint Mohammed Saeed Hareb Almheiri
Minister of Climate Change and the Environment United Arab Emirates
minister_office@moccae.gov.ae

Eng. Muna Omran Al Shamsi
Acting Director Biodiversity Department
CITES United Arab Emirates
cites@moccae.gov.ae
moalshamsi@moccae.gov.ae

His Excellency Pohamba Penomwenyo Shifeta
Ministry of Environment and Tourism Namibia
Lifo.Fillemon@met.gov.na
Janine.Sharpe@met.gov.na
Colgar.Sikopo@met.gov.na
Romeo.Muyunda@met.gov.na

Namibia CITES Authority
Natural Resources Management
+264 (61) 284 25 26 / 29
elly.hamunyela@met.gov.na
wilma.moller@met.gov.na
iifo.fillemon@met.gov.na
josefina.shapi@met.gov.na

Ms Ivonne Higuero,
CITES Secretary General
ivonne.higuero@cites.org

Ms Sofie H. Flensburg
Legal Officer
Legal Affairs and Compliance
CITES Secretariat
CH-1219 Chatelaine Geneva – Switzerland
Tel: +41 - (0) 22 -917-81-39/40
Sofie.flensburg@cites.org

Ms Carolina Caceres
Chair of CITES Standing Committee
carolina.caceres@ec.gc.ca

Mr Mathias Lörtscher
Chair of CITES Animals Committee
mathias.loertscher@bvet.admin.ch

Mr Danny de Man
EAZA Director for Conservation and Population Management
EAZA Deputy Executive Director
danny.de.man@eaza.net

Dr Arne Lawrenz
EAZA African Elephant Coordinator
lawrenz@zoo-wuppertal.de

Dr Thomas Kölpin,
EAZA Elephant TAG chair
Assistant Coordinator
Dr Ann-Kathrin Oerke
akoerke@dpz.eu

Cc: IUCN African Elephant Specialist Group
c/o Professor Rob Slotow
slotow@ukzn.ac.za

Cc: Co-chairs of the African Elephant Coalition
info@africanelephantcoalition.org

Cc: Dr Patrick Omondi
Kenya Wildlife Service
pomondi@kws.go.ke

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RE: URGENT UPDATE ON THE TRADE IN WILD CAUGHT ELEPHANTS FROM NAMIBIA TO THE UAE

In October 2021, 22 elephants were captured and taken to a holding facility in Gobabis, the regional capital of the Omaheke Region of eastern Namibia. The holding facility is located on a trophy hunting safari business called *GoHunt Namibia Safaris* owned by Mr Gerrie Odendaal.

The wild elephants are being held captive in preparation for export to zoos in the United Arab Emirates, possibly to the Al Ain Zoo—a member of the European Association of Zoos and Aquaria (EAZA)—and the Sharjah Desert Park. According to reports this deal was organised by a South African wildlife trader/ broker and a large amount of money has changed hands in this clearly commercial transaction. Additional information received by some of the PREN Members claims that several charter companies have allegedly refused to ship the elephants to their destination.

A [Legal Opinion](#) was obtained by the EMS Foundation, a member of the Pro Elephant Network in 2021. The legal Opinion stated 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, nor for a country outside of the range states for *Loxodonta Africana* to issue an import permit, particularly because Appendix II does not apply to the export and the available evidence indicates that exporting

the Namibian wild caught elephants to an ex situ programme cannot meet the requirements of Article III for trade in Appendix I species, particularly the non-detriment criterion.

The removal of wild African elephants for captive use is not supported by the African Elephant Specialist Group of the IUCN Species Survival Commission (IUCN/SSN AfESG). In an [official statement](#) they clarified, “Believing there to be no direct benefit for *in situ* conservation of African elephants, the African Elephant Specialist Group of the IUCN Species Survival Commission does not endorse the removal of African elephants from the wild for any captive use.”

In addition, the Namibia Ministry of Environment, Forestry and Tourism confirmed in a [public statement](#), issued on 15 February 2022, that the elephants were captured in the Kunene region of Namibia. For the record, we are relying upon our sources who have always indicated that the captured elephants are from threatened [desert adapted populations](#).

In a letter, dated 31 January 2022, to PREN from the EAZA Executive Office, the EAZA Elephant Taxon Advisory Group (TAG) and the EAZA Ex-situ Programme for African Elephant (EEP), they stated that the EAZA Ex situ Programme (EEP) for African elephants has no intention nor need to import African elephants from the wild. They also stated that EAZA “is not principally against legal and sustainable importation of animals from the wild to accredited zoos in exceptional circumstances, and when in support of population management and species conservation needs. The EAZA Elephant Taxon Advisory Group (TAG) and the two EEPs have taken the position that such circumstances do not apply at present and thus don’t support importation of elephants from the wild into the EAZA population. EAZA Members are bound to abide by this position of the EEP and TAG.”

Since [December 2020](#) the Members of PREN have attempted to engage with the Namibian authorities regarding the capture and sale of wild elephants in Namibia. More specifically PREN members requested information on the Non-Detriment Finding and data on the population and condition of the capture. Unfortunately, all the communications from PREN, including those sent in [August](#), [September](#) and [October](#) 2021 were ignored and no action was taken to stop the capture of wild elephants in Namibia.

Access to information and the right to know is the fundamental cornerstone of democracy, transparency and accountability. This is squarely a public interest matter.

On the 12th February 2022, Namibian investigative journalist John Grobler, was apparently arrested for allegedly flying a drone over the aforementioned farm, his request for access having been denied. Grobler was apparently charged with trespassing on private property under [Ordinance 3 of 1962](#). The 1962 ordinance clearly refers to a person physically trespassing and could not possibly refer to the use of a modern drone. The Pro Elephant Network joins the protests from many national and international institutions which firmly condemned the Ministry of Environment, Forestry and Tourism (MEFT) for this action and NAMPOL for the charges with no evidence and the confiscation of the journalist’s material.

Aerial footage confirms that the holding facility is surrounded by high walls and the sparse natural vegetation has been consumed by the elephants over the past four months. There is little indication of shade or shelter in the holding area. This raises severe concerns for the welfare of the elephants, in particular for the two baby calves who were born into this captive situation. The birth of the two calves would also indicate that the capture and transport to Namibia’s East, to the holding facility situated about 600 km away from the area of the capture, had included elephants in their last trimester of pregnancy. This raises further welfare, safety and legal concerns. The advanced pregnancies should have been identified prior to capture.

Further questions relating to the legality of the capture have been raised, if the elephants had flown out as planned, the export of the elephants would be in violation of the IATA regulations, which prohibit the travelling of animals in their last trimester of pregnancy.

In addition, transporting the elephants with calves adds further risk. The new-born calves would need to be forcibly separated from their mothers for the duration of the long journey. A mother and calf cannot travel in the same crate, because the risk of the mother trampling or injuring the baby during the loading and unloading procedures is too high.

PREN will provide further information if requested on the understanding that both EAZA and CITES will take the necessary precautionary measures to halt the export of these elephants to the UAE and to ensure that these elephants are returned to the wild as soon as possible.

PREN Members urgently request that:

- the two CITES Parties halt the export of these elephants to the UAE and ensure that these elephants are returned to the wild as soon as possible;
- the CITES Standing Committee takes a clear position on this unfortunate matter of the capture of wild elephants in Namibia for export to captivity at its upcoming 74th meeting in Lyon, France, 7 - 11 March 2022;
- the CITES Secretariat and the CITES Parties commits to robust disciplinary measures if the export goes ahead.

We appreciate your urgent feedback on our correspondence.

Yours Sincerely,



Stefania Falcon
PREN Coordinator

stefania@proelephantnetwork.org

Mobile +27 (0) 73 301-21-07



www.proelephantnetwork.org

SIGNING MEMBERS OF PREN

Owais Awan	Advocate High Court, Islamabad
Suparna Bakshi-Ganguly	President and Co-Founder, Wildlife Rescue & Rehabilitation Center, Bangalore, India
Dr Brett Bard	Veterinarian, South Africa
Dr Jessica Bell Rizzolo	Postdoctoral Researcher, the Conservation Criminology Lab, Dep of Fisheries and Wildlife, Michigan State University
Janey Clegg	Committee Member, SPCA Mutare, Zimbabwe
Professor David Bilchitz	Director, South African Institute for Advanced Constitutional, Public and Human Rights and International Law - South Africa
Megan Carr	Founder, Rhinos in Africa
Lenin Chisaira	Founder, Advocates 4 Earth – Green Law Connect, Zimbabwe
Dr Betsy Coville	Exotic / Wildlife Animal Veterinarian
Dr Harvey Croze	DPhil (Oxon) Collaborating Researcher – Amboseli Trust for Elephants – Kenya

Nomusa Dube	Founder, Zimbabwe Elephant Foundation
David Ebert	Advocate, Founder Director of The Animal Defense Partnership – USA
Stefania Falcon	Co-Founder, Future 4 Wildlife – South Africa
Daniela Freyer	Co-Founder, Pro Wildlife, Germany
Michele Franko	Captive Elephant Caregiver and Advocate – USA
Chief Stephen Fritz	Indigenous Leader, South Peninsula Khoi Council – South Africa
Dr Toni Frohoff	Ethologist and Behavioral Biologist, Founder of TerraMar Research
Dr Marion E. Garai	Elephant Behavior Specialist - South Africa
Johanna Hamburger	Wildlife Attorney – Animal Welfare Institute – USA
Dr Ross Harvey	Environmental Economist, Botswana
Heike Henderson-Altenstein	Director, Future for Elephants e.V.
Alok Hisarwala Gupta	Lawyer, Animal Law – India
Iris Ho	Head of Policy - Pan African Sanctuary Alliance (PASA)
Peter Hodgskin	Founder, Hands-off Fernkloof, South Africa
Sangita Iyer	B.Sc., M.A., Founder of Voice for Asian Elephants Society, Nat Geo Explorer and Wildlife Filmmaker
Lynne James	Independent, Elephant Conservation, Zimbabwe
Dr Mark Jones	Veterinarian, Born Free Foundation - UK
David Kabambo	Founder Director of Peace for Conservation – Wildlife Management - Tanzania
Dr Paula Kahumbu	WildlifeDirect, Kenya
Professor Mohan Kharel	Tribhuvan University, Kathmandu, Nepal
Nuria Maldonado	Ecologist, Environmental Science, Max Plank Institute
Brett Mitchell	Director, Elephant Reintegration Trust, South Africa
Jim Karani	Advocate, Lawyers for Animal Protection in Africa – Kenya
Dr Winnie Kiiru	Founder, Conservation Kenya
Brigitte Kornetzky	President and Founder of Elefanten in Not - Switzerland / India

Kahindi Lekalhaile	Africa Network for Animal Welfare, Kenya
Dr Smaragda Louw	Director, Ban Animal Trading, South Africa
Giorgio Lombardi	Warden Vogelgat Private Nature Reserve, South Africa
Linda Masudze	Advocate 4 Earth, Zimbabwe
Varda Mehrotra	Environmentalism, Climate Crisis Researcher – India
Dr Cynthia Moss	Director, Amboseli Trust for Elephants, Kenya
Dr Nurzhafarina Binti Othman	Founder: Seratu Aatai, Elephant Conservation and Research Coordinator at HUTAN-KOCP - Malaysia
Sharon Pincott	Elephant Behavioural Specialist, ex-Hwange, Zimbabwe
Michele Pickover	Director, EMS Foundation, South Africa
Bharati Ramachandran	CEO of the Federation of Indian Animal Protection Organisations – India
Ian Redmond OBE	Founder, African Ele-Fund and Elefriends Campaign, Chairman of Ape Alliance and Co-founder of Rebalance Earth
Ingo Schmidinger	Elephant Husbandry – Co-Founder iScapes
Dr Jan Schmidt-Burbach	Veterinarian, Head of Wildlife Research and Animal Welfare, World Animal Protection International
Dr DJ Schubert	Wildlife Biologist, Animal Welfare Institute - USA
Dr Liz Tyson	Animal Welfare Law, Programs Director - Born Free USA
Antoinette Van de Water	Director, Bring the Elephant Home, South Africa
Vasanthi Vadi	Trustee of the Federation of Indian Animal Protection Organisations – India
Prof Dan Wylie	Rhodes University, South Africa