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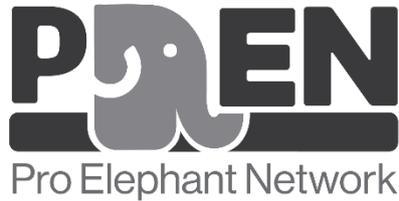
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Friday 17 March 2023

OPEN LETTER

URGENT REQUEST FOR INFORMATION ON THE CONDITIONS AND STATUS OF NAMIBIAN WILD ELEPHANTS IN CAPTIVITY IN THE UAE

The [Pro Elephant Network](#) (PREN) consists of a significant international community of diverse individuals and organizations, comprising specific expertise on wild and captive African and Asian Elephants, including but not limited to the fields of science, health, conservation, welfare, economics, community leadership, social justice and the law.

The Convention on International Trade in Endangered Species (CITES) is a multilateral treaty designed to ensure that the international trade in specimens of wild animals and plants does not threaten the survival of the species in the wild.

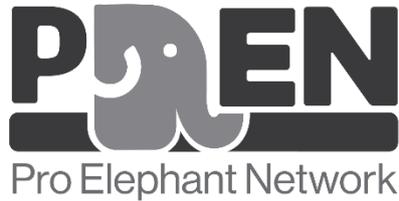
The absence of a thorough enforcement structure makes CITES restrictions dangerously ineffective. The results of a [study](#) released this month entitled *International Environmental Agreements and Imperfect Enforcement: Evidence from CITES* suggests that discussions should be focused away from whether CITES should partially restrict trade or impose a complete trade ban towards discussions on better enforcement. Enforcement is crucial for effective international environmental agreements.

Furthermore, the study states that imperfect enforcement may drive wildlife trade from regulated to unregulated countries and from legal to illegal sources. The study sets out that CITES could preserve wildlife if its regulations are properly enforced. The study found that after 20 years of a species' inclusion into CITES, wildlife populations increase by approximately 66% in countries with thorough enforcement, irrespective of whether trade in the species is restricted or completely banned under CITES.

The controversial and highly irregular import of [twenty-two wild-caught Namibian Desert Elephants](#) into permanent captivity to two zoos in the United Arab Emirates (UAE) is a clear example of lax CITES enforcement.

The current status of all these Elephants is of concern and is unknown.

Since [December 2020](#) when the sale of these Elephants was announced, the Members of PREN have repeatedly attempted to engage with the Namibian and CITES authorities, as well as the CITES Secretariat, in an attempt to prevent the capture of these Elephants.



CITES authorities have had every opportunity, and have been provided with sufficient evidence, to stop the sale and capture of the wild rare desert-adapted Elephants in Namibia. The CITES Secretary-General, Chair of the Standing Committee and Chair of the Animals Committee were provided with detailed information which they could have used to prevent the Elephants from being exported from Namibia and Imported into the UAE.

This [commercial transaction](#) was, from the onset strongly criticised by the international community of Elephant experts and conservationists as ill-conceived and irresponsible in terms of its negative conservation impacts and unacceptable welfare standards.

According to the [Daily Maverick](#), the capture of the Elephants in Namibia, divided the wild herd, separating family members, mothers and calves, as well as leaving behind some members of the group, including some juveniles.

The twenty-two captured Elephants, some of whom were pregnant, were relocated to a holding facility which provided, according to the published images, minimal welfare standards, on a trophy hunting farm. Against the rules of the International Air Transport Association (IATA), pregnant Elephants and Elephants with calves were transported from the holding facility to an airport and then flown to the UAE. The Elephant group was then divided between two captive facilities namely the Al Ain Zoo and Sharjah Safari Park.

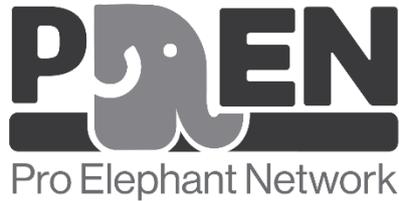
Elephants are highly cognitive social and sentient beings; they create bonds that last a lifetime and suffer tremendously when separated from family members and their own societies. Post Traumatic Stress Disorder (PTSD) has been widely documented in Elephants as well as the negative effects of capture and captivity on the physiology and health of the Elephant.

[Very little is known](#) about the well-being of the Elephants translocated to the UAE. The Elephants at the Sharjah Safari Park were [on public display](#) from October 2022. In January 2023, a calf was also visible which suggests that at least one of the Elephants transported from Namibia was pregnant.

Even though the [Al-Ain Zoo](#) in Abu Dabi had promoted the [Elephant Safari with its African Elephants](#) since 2019, including the mention of two African Elephants which, [according to the website](#), can be hand-fed by tourists, the Elephants have not yet been publicly exhibited after they arrived in the UAE, a year ago.

Subjugating wild large animals such as African Elephants for close human interaction is a below-standard practice that involves a substantial amount of cruelty and which could result in [injuries and even mortalities](#). The training of Elephants for human interaction is an unacceptable practice that is condemned by most international tourist and zoo guidelines including the [TripAdvisor Animal Welfare Policy](#) and the [European Association of Zoos and Aquaria \(EAZA\)](#) codes and standards.

PREN has, on numerous occasions, requested a copy of the Non-Detriment Finding (NDF), a document that authorities must issue to confirm the scientific grounds that any export of animals, listed under Appendix I or II of CITES, will not be detrimental to the survival of the species, no such document has been forthcoming.



Removing wild Elephants from Africa to *ex-situ* captive destinations such as the zoos in the UAE is in conflict with both IATA and EAZA protocols. [EAZA reiterated its condemnation](#) of the import of Namibian Elephants into the UAE at the end of 2022.

Despite being in contravention of CITES regulations and annotations the export / import went ahead. This serious issue was addressed at the 74th Meeting of the Standing Committee in Lyon in March 2022 and at the 19th CITES Conference of Parties held in Panama in November 2022. As a result, a temporary [moratorium](#) has been placed on all exports of wild African Elephants outside their natural range.

PREN is deeply concerned about the well-being and current status of the twenty-two Namibian Elephants held captive in the UAE facilities.

PREN urgently requests that the CITES Secretariat, as part of its Enforcement mandate, instruct the CITES Authority in the UAE to submit reports on the current status of all the Elephants exported from Namibia, currently in captivity at Al Ain Zoo and the Sharjah Safari Park, including:

1. Confirmation of the exact number of Elephants that were exported from Namibia to the UAE, what happened to the Elephants after they had left Namibia – for example, how were they divided up and where exactly did they go to;
2. The exact number of Elephants currently at the two aforementioned locations, the Elephants' genders and ages and corresponding locations;
3. The individual condition of the Elephants including copies of recent medical and behavioural assessments on the surviving Elephants.

This report must also be made public in the interest of transparency and public interest.

If the process to have an EAZA Membership formally and effectively removed [requires some time](#), PREN members hereby ask EAZA that the information requested in points 1,2, and 3 mentioned above be made available in the interim.

We look forward to your urgent response,

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Stefania Falcon', with a checkmark at the end.

Stefania Falcon
PREN Coordinator

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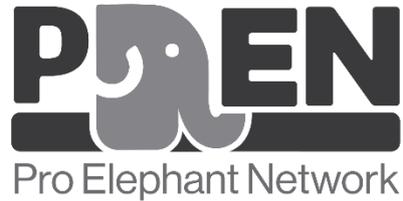
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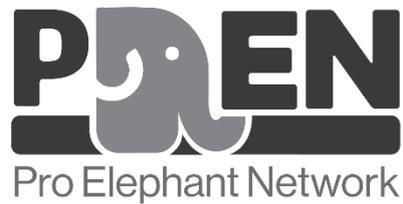
SIGNING MEMBERS OF PREN

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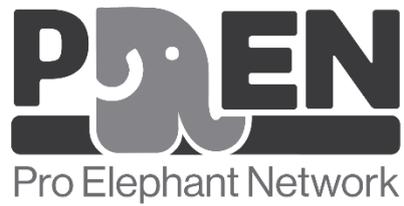
Advocate High Court, Islamabad



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| Suparna Baksi-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 |
| Megan Carr | Founder, Rhinos in Africa |
| Lenin Chisaira | Founder, Advocates 4 Earth – Green Law Connect, Zimbabwe |
| Dr Betsy Coville | Exotic / Wildlife Animal Veterinarian |
| 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 Behaviour Specialist - South Africa |
| Heike Henderson-Altenstein | Co-Founder, Future for Elephants e.V. |
| Iris Ho | Head of Policy - Pan African Sanctuary Alliance (PASA) |
| Sangita Iyer | B.Sc., M.A., Founder of Voice for Asian Elephants Society, Nat Geo Explorer and Wildlife Filmmaker |



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| 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 |
| Duncan McNair | Lawyer, CEO of Save The Asian Elephants |
| 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 |
| Professor Bob Jacobs | Neuroscience Researcher – Colorado College – USA |
| Lynne James | Independent, Elephant Conservation, Zimbabwe |
| Kahindi Lekalhaile | Africa Network for Animal Welfare, Kenya |
| Dr Smaragda Louw | Director, Ban Animal Trading, South Africa |
| Linda Masudze | Advocate 4 Earth, Zimbabwe |
| Varda Mehrotra | Co-Founder, Samayu, A Just World – India |
| Dr Nurzhafarina Binti Othman | Founder: Seratu Aatai, Elephant Conservation and Research Coordinator at HUTAN-KOCP - Malaysia |
| Tina Papadopoulou | Biologist, Co-Founder of Friends of Bunka |
| 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 |



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| 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 |
| Mark Stratton | Investigative Journalist, Founder of Friends of Bunka |
| 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 |