

14 October 2019

Permanent Mission of Namibia to the United Nations

H.E. Mr. Neville Melvin Gertze

Ambassador Extraordinary and Plenipotentiary Permanent Representative

Delivered By Hand

Excellency,

### **URGENT LETTER RE PROPOSED EXPORT OF ELEPHANTS FROM NAMIBIA TO PAKISTAN**

We, the undersigned, are a group of thirty-five global specialists in elephant biology, husbandry, elephant management, legal and policy analysis, economics and conservation, most of whom are based in Africa.

We present our compliments to the Permanent Mission of Namibia to the United Nations and His Excellency.

It has been reported in the press in both Pakistan<sup>1</sup> and Namibia<sup>2</sup> that Pakistan has made an application to import 10 African elephants from Namibia to captive facilities in Pakistan. This has also been confirmed by the Ministry of Environment and Tourism.

We are deeply concerned about this proposed export. Our concerns are based on our understanding of elephant biology, of international agreements and national legislation as well as public sentiment within Africa and more widely.

We urgently call on the President of Namibia not to approve such an export.

We would greatly appreciate it if you could urgently forward our concerns and this letter to your President and the relevant authorities for action.

Removing baby elephants from their families is increasingly recognised as an ethically and ecologically unacceptable practice. It is universally recognized that elephants are wide-ranging, vastly intelligent, sentient beings with a highly organised social structure including strong family bonds that can last a lifetime. Elephants also have basic needs for stimulating ecological and social environments, and for the freedom to exercise choice over their foraging options and companions. These needs cannot be met under captive conditions and elephants so deprived inevitably suffer from physical and mental pathologies. At the same time, it is known that removal of elephants from their social groups and ecosystems is very disruptive to the wild populations, while having extremely traumatic and long-lasting

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<sup>1</sup> <https://tribune.com.pk/story/2069103/1-permit-importing-elephants-issued-lhc/>

<sup>2</sup> <https://www.namibian.com.na/84183/read/Export-of-elephants-under-review>

effects on the psychological well-being of the juvenile elephants removed from their families.<sup>3</sup> Young elephants are dependent on their mothers and other family members to acquire necessary social and behavioral skills. Male calves only leave their natal families at 12 to 15 years old and females remain for life. Disruption of this bond is physically and psychologically traumatic for both the calves and remaining families and groups and the negative effects can be severe and lifelong.<sup>4</sup> The well-documented symptoms of Post-Traumatic Stress Disorder (PTSD) displayed by captive elephants in zoos around the world are testimony to the damage caused by the operations of capture and long-distance transport to such *ex situ* locations.

According to a paper submitted by the Governments of Burkina Faso and Niger, presented at the 69<sup>th</sup> meeting of the Standing Committee of the Convention on International Trade in Endangered Species (CITES SC69) in Geneva (Switzerland), 27 November – 1 December 2017, “*captured calves transported to holding facilities suffer depression, lethargy, anxiety, increased stress, intra-specific aggression, and a diminished or non-existent appetite, sometimes resulting in death or contributing to premature mortality. Training in temporary facilities may include food and/or light deprivation, restriction of movement, forcing the animal into an uncomfortable position for extended periods of time, and regular beatings*”.<sup>5</sup>

Based on the body of overwhelming scientific evidence, South Africa took the commendable decision in 2008 to ban the capture of elephants from the wild for the purposes of captivity and trade under the terms of the National Norms and Standards for the Management of Elephants in South Africa (2008). The International Union for Conservation of Nature’s Species Survival Commission African Elephant Specialist Group opposes the removal of African elephants from the wild for any captive use.<sup>6</sup> This position was reaffirmed at the group’s meeting in Pretoria, South Africa in July 2019. On 6 September 2019, elephant specialists from around Africa and the world participated in an Indaba in South Africa, ‘*Taking Elephants out of the Room*’, to scrutinize the science, policy and welfare issues related to elephants in captivity. The overwhelming conclusion of the Captive Elephant Indaba was that no new elephants should be placed in captivity and elephants currently in captivity should be rewilded.<sup>7</sup>

Under the Convention on International Trade in Endangered Species of Wild Fauna and Flora (CITES), African elephants from countries on Appendix II listing (currently Botswana, Namibia, South Africa and Zimbabwe) may be exported only to ‘appropriate and acceptable destinations’. In August, the 18<sup>th</sup> Conference of the Parties (CoP18) agreed that ‘appropriate and acceptable destinations’ for African elephants taken from the wild are defined as *in situ* conservation programmes or secure areas in the wild, within the species’ natural and historical range in Africa<sup>8</sup>. Exemptions are foreseen only in exceptional circumstances where, in consultation with the CITES Animals Committee and the IUCN African Elephant Specialist Group, it is considered that a transfer to *ex situ* locations will provide demonstrable *in situ* -conservation benefits for African elephants, or in the case of temporary transfer in

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<sup>3</sup> G. A. Bradshaw and Allan N. Schore, “How Elephants Are Opening Doors: Developmental Neuroethology, Attachment and Social Context,” *Ethology* 113, no. 5 (2007): 426–36, <https://doi.org/10.1111/j.1439-0310.2007.01333.x>; Graeme Shannon et al., “Effects of Social Disruption in Elephants Persist Decades after Culling,” *Frontiers in Zoology* 10, no. 1 (2013), <https://doi.org/10.1186/1742-9994-10-62>; Rob Slotow et al., “Older Bull Elephants Control Young Males,” *Nature* 408, no. 6811 (2000): 425–26, <https://doi.org/10.1038/35044191>; G. A. Bradshaw et al., “Elephant Breakdown,” *Nature* 433, no. 7028 (2005): 807–807, <https://doi.org/10.1038/433807a>.

<sup>4</sup> Shannon, G., Slotow, R., Durant, S. M., Sayialel, K. N., Poole, J., Moss, C., & McComb, K. J. F. i. Z. (2013), Effects of social disruption in elephants persist decades after culling. *Frontiers in Zoology*, 10(1): 62. doi:10.1186/1742-9994-10-62

<sup>5</sup> <https://cites.org/sites/default/files/eng/com/sc/69/inf/E-SC69-Inf-36.pdf>

<sup>6</sup> <https://www.iucn.org/ssc-groups/mammals/african-elephant-specialist-group/afesg-statements/removal-african-elephants-captive-use>

<sup>7</sup> <https://emsfoundation.org.za/elephants-in-captivity-to-come-under-the-spotlight/>

<sup>8</sup> <https://cites.org/sites/default/files/eng/cop/18/Plen/SR/E-CoP18-Plen-Rec-03-R1.pdf>

emergency situations. This decision, with its basis in elephant biology and welfare, was accepted by an overwhelming (greater than two-thirds) majority of Parties at CoP18. It is clear that Namibia and any other exporting country that are party to CITES are obliged to respect this decision.

Conditions for African elephants in Pakistan's captive facilities are wholly inadequate and do not come close to meeting the significant physiological, behavioral and social needs that elephants require.<sup>9</sup>

Globally, public sentiment is running against the keeping of this iconic African species in captivity. Previous exports of wild elephants from Africa generated considerable backlash from the public across the world, and continued actions in this regard will damage the reputation of Namibia as a legitimate voice in nature conservation. The proposal for the re-definition of 'appropriate and acceptable destinations' was led by the African Elephant Coalition, which includes over 30 African range and non-range States. The AEC based their arguments on elephant biology but also on the important cultural and social-ecological value of elephants living in their wild ecosystems. We support the right of these African states to speak for elephants within their natural range.

It is recognized that elephants already in captivity in Africa require careful treatment in order to rehabilitate and reintegrate them into wild habitats. These methodologies are now established and there are a number of options for returning the elephants to appropriate sanctuaries and reserves.

We call on the government of Namibia to act in accordance with elephant biology, international and national legislation, and widespread and ever-increasing worldwide public opinion, and not to approve any application for the export of elephants into captivity.

Should additional information be required please address this to: Ms. Michele Pickover, EMS Foundation, [michele@emsfoundation.org.za](mailto:michele@emsfoundation.org.za)

Please accept, Excellency, the assurances of our highest consideration.

Yours sincerely,

<b>Dr Brett Bard</b>
Veterinarian, South Africa
<b>Suparna Baksi-Ganguly</b>
President & Co-Founder
Wildlife Rescue & Rehabilitation Center, Bangalore, India
<b>Dr Lucy Bates</b>
Sussex University
Elephants Alive!

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<sup>9</sup> <https://youtu.be/Ks60yNktb1g>

<p><b>Professor David Bilchitz</b>  University of Johannesburg, South Africa  Director, South African Institute for Advanced Constitutional, Public, Human Rights and International Law  Director, Animal Law Reform South Africa</p>
<p><b>Dr, Dr Gay Bradshaw</b>  Founder and Director, Kerulos Center for Nonviolence USA</p>
<p><b>Carol Buckley</b>  Director, Elephant Aid International</p>
<p><b>Megan Carr</b>  Vice-President, Global March For Elephants and Rhinos</p>
<p><b>Lenin Chisaira</b>  Advocates4Earth - Green Law Connect, Zimbabwe</p>
<p><b>Adam Cruise</b>  Editor, African Elephants Journal</p>
<p><b>Audrey Delsink, Ph.D. Candidate</b>  Elephant Ecologist and Wildlife Director, Humane Society International (Africa)</p>
<p><b>Catherine Doyle, M.S.</b>  Director of Science and Research  Performing Animal Welfare Society, USA</p>
<p><b>Nomusa Dube</b>  Founder, Zimbabwe Elephant Foundation</p>
<p><b>Chief Stephen Fritz</b>  Members of the South Peninsula Customary Khoi Council, South Africa</p>
<p><b>Dr Marion Garai</b>  Chairperson, Elephant Specialist Advisory Group  Trustee, Elephant Reintegration Trust</p>
<p><b>Petter Granli</b>  Executive Director, ElephantVoices</p>
<p><b>Dr Ross Harvey</b>  Wildlife Economist, South Africa</p>
<p><b>Dr Michelle Henley</b>  Director, Elephants Alive!, South Africa  Elephant specialist Advisory Group, South Africa</p>
<p><b>Lynne James</b>  Mutare SPCA, Zimbabwe</p>
<p><b>Dr Paula Kahumbu</b>  Wildlife Direct</p>
<p><b>Advocate Jim Karani</b>  Lawyers for Animal Protection in Africa</p>

<b>Dr Winnie Kiiru</b> Founder, Conservation Kenya
<b>Kahindi Lekalhaile</b> Africa Network for Animal Welfare
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<b>Linda Masudze</b> Advocates4Earth, Zimbabwe
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<b>Dr Joyce Poole</b> Co-Director, ElephantVoices, Kenya
<b>Dr Yolanda Pretorius</b> South African Wildlife College Elephant Specialist Advisory Group
<b>Ed Stewart</b> President and Co-Founder, Performing Animal Welfare Society
<b>Peter Stroud</b> Independent Zoological Consultant (Former Zoo Director & Curator), Australia
<b>Antoinette Van De Water, Ph.D. Candidate</b> Director, Bring The Elephant Home, South Africa Elephant Specialist Advisory Group, South Africa
<b>Amy P. Wilson</b> Director, Animal Law Reform South Africa (ALRSA)
<b>Professor Dan Wylie</b> Rhodes University