CONVENTION ON INTERNATIONAL TRADE IN ENDANGERED SPECIES
OF WILD FAUNA AND FLORA

Twentieth meeting of the Conference of the Parties
Samarkand (Uzbekistan), 24 November – 5 December 2025

CONSIDERATION OF PROPOSALS FOR AMENDMENT OF APPENDICES I AND II

A. Proposal

Transfer of the population of *Diceros bicornis bicornis* of Namibia from Appendix I to Appendix II with the following annotation:

For the exclusive purpose of allowing trade in registered rhinoceros horn, whole or pieces subject to the following:

i) only registered Government-owned stock, originating in the State (excluding seized rhinoceros horn and rhinoceros horns of unknown origin);
ii) only horns with RHODIS certificates;
iii) only to trading partners that have been verified by the Secretariat, in consultation with the Standing Committee, to have sufficient national legislation and domestic trade controls;
iv) not before the Secretariat has verified prospective importing countries and the registered stocks; and
v) the proceeds of this trade are used exclusively for rhinoceros conservation and community development programmes within or adjacent to the rhinoceros range.

All other specimens shall be deemed to be specimens of species included in Appendix I and the trade in them shall be regulated accordingly.

B. Proponent

Namibia

C. Supporting statement

1. Taxonomy

1.1 Class: Mammalia

1.2 Order: Perissodactyla

1.3 Family: Rhinocerotidae

1.4 Genus, species or subspecies, including author and year: *Diceros bicornis bicornis* (Linnaeus, 1758)

1.5 Scientific synonyms: *Rhinoceros bicornis*

1.6 Common names: English: Southwestern black or hooked-lipped rhinoceros
French: Rhinocéros noir
Spanish: Rinoceronte negro

1.7 Code numbers: No code provided in CITES Identification Manual

2. Overview

As required in Resolution Conf. 9.24 (Rev. CoP17) Annex 6: Format for proposals to amend the Appendices, this population does not meet the criteria for inclusion in Appendix I (Annex 1 of the Resolution) as the wild population is not small (**Criterion A**); it is the second largest population of this species;; it is stable;; the majority of individuals are not concentrated geographically; there are no large short-term fluctuations and although all rhino populations tend to be vulnerable to external factors especially illegal killing and trafficking, this population has not been highly vulnerable as evident from its continuous growth. Intrinsic factors are not significantly limiting in any way. Concerning **Criterion B** for inclusion in Appendix I, the population does not have a restricted distribution. The population consists of multiple discrete subpopulations (and is thus not limited to occurrence at very few locations) and is subject to a metapopulation management strategy. The number and area of the subpopulations are not subject to large fluctuations, and the population is not highly vulnerable to external factors as stated under criterion A above; no decrease is observed, projected or inferred regarding distribution, area of habitat, number of subpopulations, quality of habitat or recruitment. Regarding **Criterion C**, no marked decline in population has occurred for 46 years since the re-establishment of this population or can be inferred or projected on the basis of a decrease in area or habitat, quality of habitat, levels or patterns of exploitation, a high vulnerability to intrinsic or extrinsic factors or decreasing recruitment. The average growth rate of the population is 3% over the last Twenty (20) years.

Regarding the inclusion of the population in Appendix II, it is not required to meet any of the criteria as all populations transferred from Appendix I has to be first included in Appendix II (Annex 4 **Precautionary measure A.1**.). However, the proposal also includes an integral precautionary measure by limiting the scope of trade to once off trade in raw horn, thus providing a second precautionary measure (**Precautionary measure A.2.iii**).

3. Species characteristics

3.1 Distribution

Historically, black rhino was distributed throughout sub-Sahara Africa with the exception of the Congo basin. However, in the 1970s-80s, a poaching epidemic caused numbers to decrease by 40-90%. Since 1981, the black rhino has disappeared from many areas of Africa including Ethiopia, Malawi, Sudan and Botswana. Today, 98% of the total population of black rhino is found in just four African countries; South Africa, Namibia, Zimbabwe and Kenya.

In Namibia, the black rhinoceros was distributed from the Kunene River in the north, down to the Orange River in the south, and extended westwards to the edge of the Namib Desert (Shortridge 1934). Records from the 1700s indicate that rhinoceros was abundant at that time, but during the second half of the 19th century, the black rhinoceros was virtually exterminated by hunting in the southern parts of the country (Joubert 1969). By 1967, the distribution of black rhinoceros in Namibia was restricted to the north-western area, north of the Hoanib River, along the Huab and Ugab Rivers and in the Etosha National Park (Joubert, 1969). At that time, the national population was estimated at 90 black rhinoceros (25 in the northwestern area north of the Hoanib River, 17 south of the Hoanib River, and 48 in the Etosha National Park).

Black rhinoceros' population in Namibia is currently distributed throughout the country, in secure areas such as protected areas, communal land and private land as part of an innovative custodianship programme (Ministry of Environment and Tourism. 2003). Since 1993, the Namibian Government has made robust efforts to expand the ranges of the black rhinos in the country within their former or historical range through translocation to private farms under the custodian programmes, which resulted in increases in population growth. Efforts were also made to integrate local communities into conservation programmes (most notably in the Kunene region of Namibia) in order to protect the species. Strategically, Black Rhinos are now managed by range of different stakeholders (private sector and state) in order to increase their long-term security.

3.2 Habitat

The potential range for black rhinoceros is not restricted to a single habitat type. They can be found in savannahs and even in dry forests.

3.3 Biological characteristics

The black rhinoceros is a browser and known to visit water sources at night. In dry habitats, like in Kunene, Namibia, black rhinoceros can go longer between drinks. It is a solitary animal, and can be aggressive.

3.4 Morphological characteristics

The black rhinoceros is smaller compared to the white rhinoceros, with a body weight of up to about 900 kilograms for females and 1300 kilograms for males. The black rhinoceros differs from other rhino species by, amongst other features, the shape of its mouth (i.e. it is also called the hooked-lipped rhinoceros). Although the rhinoceros is referred to as *black*, its colours vary from brown to grey.

3.5 Role of the species in its ecosystem

Black rhinos are herbivorous browsers that eat leafy plants, branches, shoots, thorny wood bushes, and fruit. Their diet can reduce the number of woody plants, which may benefit grazers (who focus on leaves and stems of grass), but not competing browsers (who focus on leaves, stems of trees, shrubs or herbs). They have a significantly restricted diet with a preference for a few key plant species and a tendency to select leafy species in the dry season.

4. Status and trends

4.1 Habitat trends

Almost 17% of the land surface of Namibia has been placed in proclaimed protected areas, while 48% of the land surface in Namibia falls under commercial land, which is potential habitat available for black rhinoceros. Additionally, this land is also used for wildlife production comprising communal conservancies and freehold land used for wildlife production and tourism. Although it has been attractive enough to restock black rhinoceros over a large part of Namibia through the Black Rhinoceros Custodian Programme, the cost-benefit ratio has changed because the costs of providing security in the face of the risk of illegal killing are significantly higher than the current limited economic benefits from having rhinoceros on a piece of land.

4.2 Population size

Namibia holds more than a third of all the black rhinos remaining globally, and is the stronghold of the South-Western subspecies (*Diceros bicornis bicornis*), whose historical range also included southern Angola. In 2024, black rhino population in Namibian was estimated at 2 098 This estimate was obtained from aerial surveys, based on standardised techniques and other monitoring activities. Over the years, black rhino's ranges in the country has been greatly expanding, whereby 55% are now found in protected areas, 38% on freehold farms, while 7% are found on communal conservancies.

4.3 Population structure

Information on the relative age and sex structures of the populations in protected areas is available as such information is collected from a number of activities including aerial censuses, dehorning operations and the routine monitoring activities in the parks (including the SMART system and remote camera surveillance). Many black rhinoceros are individually identifiable and are of known age and have been marked with ear notches, microchips or telemetry transmitters. Rhinos under the custodian program are also individually identifiable and are marked upon translocation, and dehorning and/or occasional veterinary treatment - except juveniles in maternal groups. The latter are marked when they become independent e.g. captured to be dehorned.

A detailed analysis of this information cannot be given per subpopulation and is not material to the proposal being made. Manipulating the age and sex structure of rhino populations is essential to reduce intraspecific mortalities and ensure optimal reproduction. Removal of socially dominant post reproductive males from especially the smaller populations is essential. Removal of excess adult males to achieve a sex ratio skewed towards females result in faster breeding and population growth. Adjusting the population structure through selective removals is therefore a management strategy.

4.4 Population trends

The Namibian black rhinoceros population has undergone continuous growth from just under 1 021 in 2004 to over 2 098 in 2024 (Figure 1). The stable trend identifies that the population is viable in all respects despite a dip decline experienced in 2016. The increase in number of black rhinos can therefore be accounted for rigorous efforts taken by the government in protecting and managing of the black rhino population in the country. This included expansion of range through translocation of animals to more secure areas (Etosha National Park, Waterberg Plateau Park), horn removal (dehorning) at times when illegal killing was a threat, close protection and monitoring of the existing populations, and the creation of several new populations. Although all black rhinoceroses in Namibia belong to the State, the population occurs within different land tenure systems (protected areas, communal land and on private land as part of an innovative custodianship scheme). Etosha National Park initially served as the major donor population for translocations into other areas (custodians, conservancies and other protected areas).. In some areas, the population has reached densities that preclude maximum growth rate, and in some cases leads to losses through fighting and other intra-specific interactions.

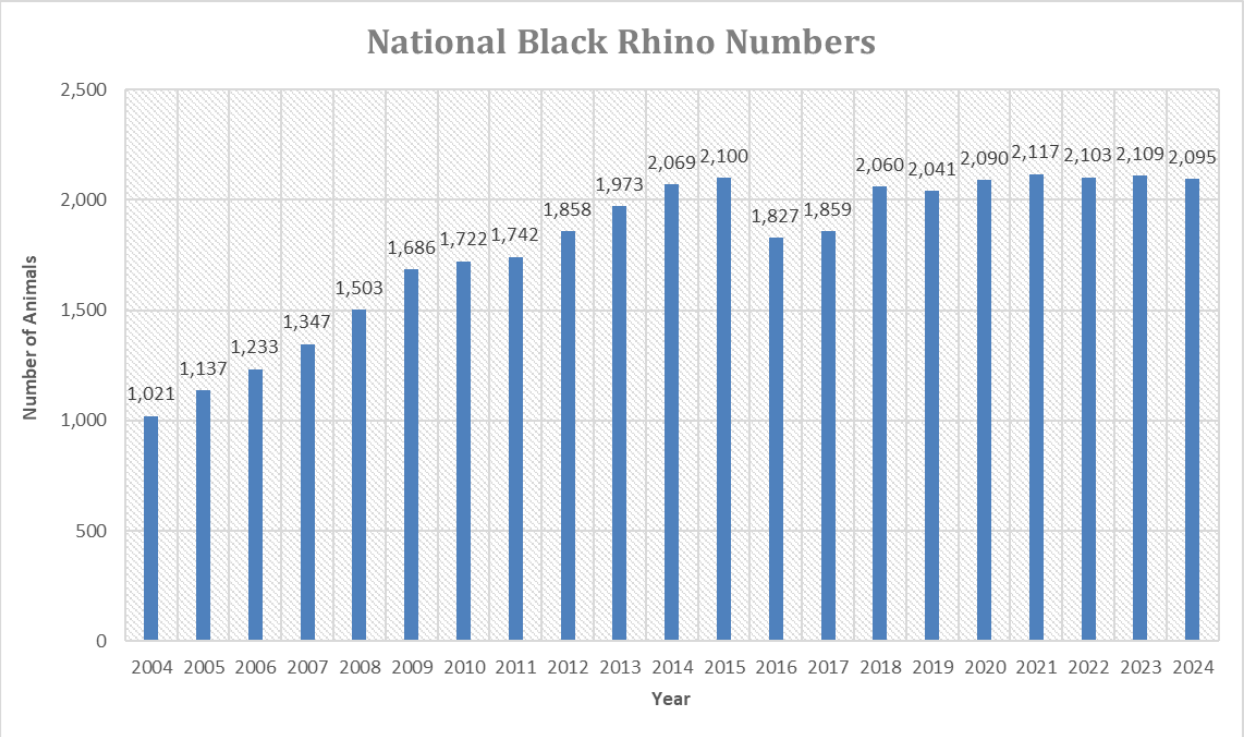

Figure 1. Trend in the number black rhino between 2004 and 2024.

4.5 Geographic trends

The distribution of the species is precisely known in Namibia as all black rhinoceros belong to the State. More specific information is not provided for security reasons. Its geographic trend is expanding both in the number of sub-populations and the size of its range.

5. Threats

The greatest threat to the Namibian black rhino population is the inception of intense illegal killing of rhinos for their horns (Chanyandura et al., 2021). The level of resources required to effectively counter the illegal killing of black rhino far exceed available budgets, including external funding and this is also one of the threats facing the Namibian black rhino population. International constraints on the ability to maximize the economic value of black rhino (by trading legally in rhino horn) are an opportunity cost to Namibia. Figure 2 below illustrates the number of black rhinos poached in Namibia between 2013 and 2024.

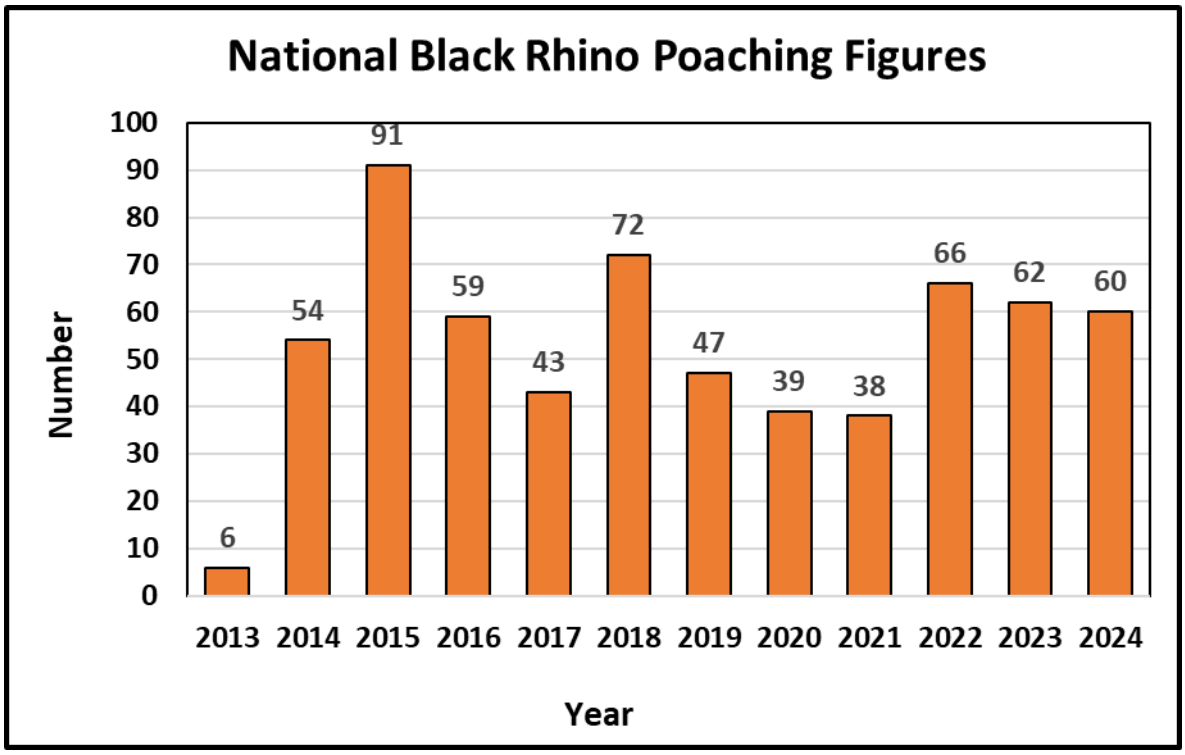

Figure 2. Number of black rhinos poached between 2013 and 2024.

6. Utilization and trade

6.1 National utilization

Domestic consumptive use of black rhinoceros and trade in rhinoceros horn and other products is currently not permitted in Namibia. Namibia has a CITES approved trophy hunting export quota of five (5) animals per year. This quota generates funds for conservation. Non-hunting tourism income from black rhinoceros is difficult to quantify. Revenue from tourism is not disaggregated to specify revenue derived from black rhinos.

Between 2009 and 2024, twenty (20) black rhinoceros were hunted for trophy in Namibia (Figure 3). Utilization of black rhinos (trophy hunting) is undertaken within the framework of existing CITES provisions. Animals for trophy hunts are individually identified based on selected criteria. Only surplus adult male animals are considered for trophy hunting. Preference is given to hunt post-reproductive males (+25 years of age). However, occasionally other males could be targeted, where they have fought excessively, repeatedly broken out of certain areas, or disrupted the existing social structure (e.g. by killing or displacing other individuals).

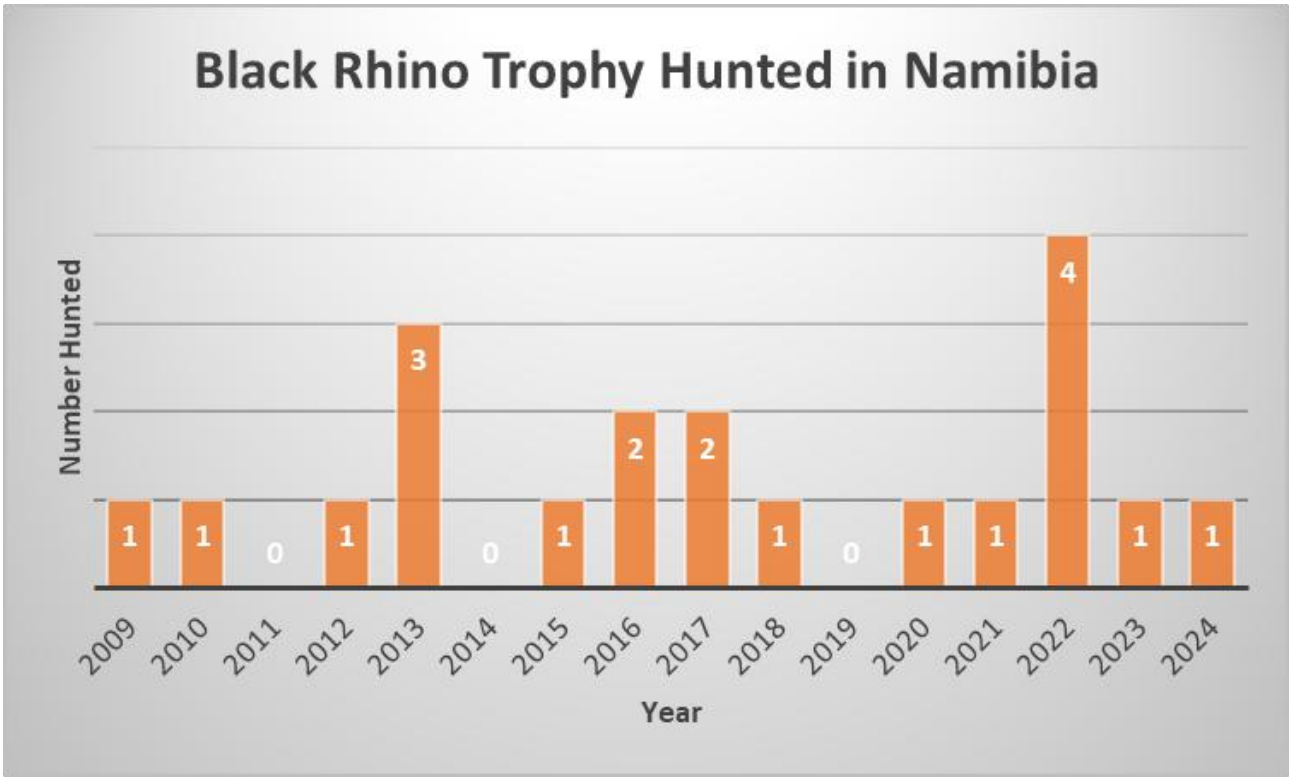

Figure 3. Number Black rhinos hunted as trophy (2009 - 2024)

Removing a small number of surplus black rhinoceros through trophy hunting has been sustainable and contributed significantly to the success of the black rhinoceros conservation programme by placing a significant value on this species. Considerable funds have been raised through the trophy hunting of one animal, and has been used to further enhance the conservation efforts for the species. As all black rhinoceroses in Namibia belong to the State, all revenue from trophy hunting is re-invested in conservation programmes through the trust fund established pursuant to the Game Products Trust Fund Act, Act No. 7 of 1997.

Rhino horn stocks: The current status (as of June 2025) of the Namibian rhinoceros horn stocks is summarized in the following table, where natural and management origin refers to horn obtained from natural mortalities, or from management related practices (i.e. of legal, Namibian origin); seized origin refers to horn recovered through seizures (i.e. of illegal origin) and unknown refers to items for which no documentation is available:

Origin	Description	Total number	Total weight (kg)	Mean weight (kg)
Natural and Management	Whole horns	1, 131	1, 606.67	1.42
	Horn pieces	3, 243	3, 003.77	0.93
Sub-total			**4, 610.44**	
Seized	Whole horns	28	48.97	1.75
	Horn pieces	6	10.90	1.75
Unknown	Whole horns	0	0	0
	Horn pieces	0	0	0
Total	**Whole horns**	**1, 060**	**1, 655.64**	
	Horn pieces	**3, 249**	**3, 014.67**	
GRAND TOTAL			**4, 670.31**	

All seized or confiscated horns are separately stored, with some horn being held on behalf of the Protected Resources Sub-Division of the Namibian Police (PRD) as evidence for pending court proceedings. Growing horn stocks represent major management, administrative and security problems. The international conservation community has to take cognizance of this situation and the impasse that conservation agencies find themselves in, where law enforcement is effective and where there is cooperation from the public.

Namibia maintains a detailed computer database of all specimens in storage, with source documentation, and all specimens are marked so as to make them individually recognizable.

6.2 Legal trade

No trade in live specimen has taken place in recent years. Only export in hunted trophies of not more than five (5) per year, based on the CITES export approved quota (see Figure 3).

6.3 Parts and derivatives in trade

The only parts in trade are hunting trophies, see 6.2.

6.4 Illegal trade

There are no records of seizures of black rhinoceros parts and derivatives from other countries in Namibia. Since 2014, less than 73 sets of horns (72 black rhinoceros were illegally killed since 2014) may have entered trade due to interdictions and arrests.

6.5 Actual or potential trade impacts

The current levels of exports of hunting trophies and live animals are at comparatively low levels and have had no impact on the overall population growth rate which was given in 4.4.

Estimating the potential impacts of legal trade on wild rhino populations requires a nuanced understanding of consumer motivations and the complex economic factors that influence supply and demand. Rhino horn holds dual value: it is utilised in Traditional Chinese Medicine (TCM) and also functions as an investment commodity. Interviews with TCM consumers indicate a preference for legal horn over illegally sourced alternatives, due to ethical considerations (non-lethal harvesting) and the anticipated benefits of lower, more stable prices (Hanley, 2017; Vu et al., 2023), and it can thus be anticipated that “humane harvesting from live animals may significantly displace poaching” (Hanley, 2017).

As an investment asset, rhino horn is prized for its scarcity. Ironically, trade bans have exacerbated its value by creating speculative bubbles. Comparable patterns have been observed in the markets for ivory and rosewood, where investors deliberately restrict supply to inflate demand (Zhu, 2019). The price inelasticity of rhino horn—where consumers are willing to pay any price—and deeply entrenched beliefs in its medicinal efficacy render prohibition policies largely ineffective (Zhu et al., 2020). Conversely, legal trade could mitigate scarcity value, stabilise prices, and align with TCM consumer preferences. The risk of illegal horn infiltrating the legal market can be mitigated using existing technologies such as the RhODIS DNA profiling system, which enables unique identification of horn sources.

The extent to which legal trade would affect wild populations hinges on the volume of legal horn available for market distribution (Taylor et al., 2017). Current and projected demand can be met through the release of existing stockpiles and routine dehorning of live rhinos—practices already in place to deter poaching. South Africa reportedly holds approximately 65 tonnes of rhino horn, far exceeding the estimated 8 tonnes (equivalent to at most 1,500 rhinos) currently trafficked illegally each year. Taylor et al. (2017) have predicted that the demand, even if expanded by a new consumer base, can be satisfied by harvesting of rhino horn from wild animals.

Critics (e.g., Eikelboom et al., 2020) argue that illegal demand may escalate under legal trade, particularly if the removal of legal restrictions broadens the consumer base in Vietnam and China consumer countries and removes the assumed stigma associated with purchasing an illegal

commodity. However, there may be little to no social stigma attached to the consumption of rhino horn in Vietnam, as consumers have little to fear from wildlife protection laws (Shairp 2016). Similar to other luxury goods, prices are unlikely to fall to levels that would significantly increase accessibility. Those currently able to afford illegal horn are likely to be the same individuals who would purchase it legally—particularly if legal horn is ethically sourced and of comparable or superior quality. Should the consumer base grow with an increasing spending power within the Asian market (Crookes et al., 2015), it can be assumed that the price may increase in a free market system, and that consumers may compete for the product. The current price inelasticity of rhino horn may not be governed by the same rules when legally traded and free market procedures and policies become relevant. At this point it should be mentioned that users prefer wild rhino horn product over 'farmed' rhino horn, which may serve to incentivize rhino horn keepers to ensure ethical, natural keeping of rhino populations (Hanley, 2017; Vu et al., 2023). Should the trade be legalized, government institutions would need to ensure that these animals are kept under acceptable conditions. Namibia in particular, prides itself in upholding high ethical standards of wild animal keeping and protection (Controlled Wildlife Products and Trade Act, 2008).

According to free-market principles, an increase in demand would drive up prices, thereby incentivising supply—especially when profits are directed toward conservation stakeholders rather than criminal networks. A key advantage of a legal trade framework is that revenue would support conservation efforts rather than funding illicit activities. Currently, the most significant threat to wild rhino populations is the unsustainable cost of anti-poaching efforts. To date, cumulative expenditures across Africa have reached several billion USD, with limited long-term impact and no sustainable funding mechanism, and particularly governments being unable to carry costs (Lindsey et al., 2021; Rubino et al., 2018).

A recent study modelling the effect of economic dynamics under a legal trading system on wild rhino populations indicates that legal trade could greatly benefit the conservation of rhino populations, providing that the user demand can be met (Doyle et al., 2024). Although current projections are necessarily based on assumptions, any shift from the status quo may offer renewed hope for the survival of the species in the wild. As is, legal trade may replace illegal trade with two significant differences: rhinos may live, and profits may go to those who invest in their survival. Finally, if legal trade does not produce the intended conservation outcomes, regulatory restrictions could be reintroduced.

7. Legal instruments

7.1 National

In Namibia, Black Rhinos are classified as a "Specially Protected" species under the Nature Conservation Ordinance (Ordinance 4 of 1975, as amended) and and its parts as a "Controlled Wildlife Product" under the Controlled Wildlife Products and Trade Act, 2008 (Act No. 9 of 2008) as amended). Hunting, capture, transport, being in possession, and trade (import, export, re-export), rhino specimens, live animals and other derivatives are subject to permits and conditions. Horns and all other parts of a rhino are classified as "Controlled Wildlife Products" under the Controlled Wildlife Products and Trade (Act 9 of 2008) as amended. The maximum penalty for contraventions related to trade in Controlled Wildlife Products is N$25 000 000.00 /or 25 years imprisonment or both.

All black rhinoceros in Namibia remain the property of the State, and those occurring on private land, as well as some communal conservancies have been placed there under the Black Rhino Custodianship Programme (in some conservancies black rhino occurred naturally). Despite being separated by space, the population is managed as a metapopulation, through management interventions, to achieve the objectives of the National Strategy.

On the basis of the Animal Health Act (Act 1 of 2011), the import and transit of raw wildlife products, including rhino horn are subject to permits issued by the Veterinary department. The transport of raw wildlife products across national and international veterinary cordon fences requires a veterinary permit. Upon request, health certificates are issued for the export of such products.

7.2 International

The black rhinoceros has been listed as Critically Endangered in the IUCN Red List of Threatened Species (IUCN 2012) since 1996. It is listed on Appendix I of CITES. Appendix I includes all species threatened with extinction which are or may be affected by trade. Trade in specimens of these species

must be subject to particularly strict regulation in order not to endanger further their survival and must only be authorized in exceptional circumstances. The black rhino has been classified as Endangered under the United States Endangered Species Act of 1973 (as amended since 1973).

8. Species management

8.1 Management measures

The 2021/2022 - 2030/2031 Black rhinoceros *Diceros bicornis bicornis* Management Conservation Strategy has been developed. The Conservation Strategy concentrates on maximizing population growth rates through biological management and range expansion. Its vision and mission are to conserve and sustainably manage a growing free ranging metapopulation of black rhinoceros of the sub-species *Diceros bicornis bicornis* within Namibia that by 2030, the subspecies *D. b. bicornis* is re-established in viable, healthy breeding populations throughout its former range, and is sustainably utilized; contributing to the species conservation costs and to improve livelihoods. The overall goal is a commitment to collectively manage the black rhinos of Namibia as a metapopulation that continues to show a positive growth trend.

Basically, the long-term sustainability of the black rhino management program depends on support at all levels of Namibian society, from the political level (to provide the necessary resources and legislative backing), to the local communities neighboring black rhino populations. It is therefore imperative that adequate and active support from politicians and the Namibian public, both those living with or in close proximity to rhinos, and other citizens who value the continued existence of rhinos in Namibia, be secured. This support is fostered by creating and improving opportunities for people living on communal land or community conservancies to benefit in some way from the presence and growth of a rhino population close to or in the same area as they live, and also where this benefit stimulates improved efforts by communities to monitor and protect these animals. Rhinos can and should be used as an important ingredient in increasing the value communities place on wildlife resident in conservancies on communal land

The management strategy also includes the reintroduction of black rhinoceros into other suitable land such as commercial farmland and communal land through the black rhinoceros custodian scheme to facilitate further increases in the national population and maintain or improve growth rates.

The *modus operandi* being utilised both locally and internationally in the illegal killing of rhinoceros and the smuggling of their horns in recent years clearly indicate the increasing involvement of highly organised and well-structured crime syndicates that are operating a lucrative international enterprise. This means that protection efforts will equally need to be scaled up, better organized and coordinated, pro-active, and focussed on shifting the 'front-line' away from the rhinoceros populations, with the aim of preventing illegal killing before it takes place. This will require a combination of appropriate management actions, improved legislation and sentences, cooperative wildlife crime-related intelligence, detection, effective investigation and prosecution, law enforcement and community support.

Preventing the theft of legally acquired horn and their leakage into the illegal market is also important and requires effective horn stockpile management. This is made relatively easier given that all black rhinoceros in Namibia belong to the Government and Government is therefore the sole owner of all black rhinoceros horns in Namibia.

8.2 Population monitoring

The Ministry of Environment, Forestry and Tourism is responsible for monitoring Black rhinos in Namibia. Monitoring indicates the overall status of the population and thus directly influence all other management actions including socio-economic outputs. Monitoring includes a series of standardized survey methods tailored for each major habitat type, region and management zone.

The black rhino monitoring and management includes frequent surveillance and patrolling, maintaining secure access to water, controlled burning, habitat management to provide optimal conditions for black rhinoceros, monitoring of the population using full-moon waterhole counts and aerial block counts. In protected areas, the use of sample aerial block counts was tested in 2002, initially using fixed wing aircraft, and since 2007 using a helicopter. This method has proven effective, providing an estimate with confidence limits. The sample aerial block counts is conducted every second year. Animals

(particularly sub-adults and juveniles) are ear-notched to assist with identification, and a database is maintained with information on all individually known specimens (the majority of the population).

8.3 Control measures

8.3.1 International

Permit control: The Ministry of Environment, Forestry and Tourism permit office at Windhoek issues all permits relating to black rhinoceros and their parts or derivatives. No competencies are delegated to local or regional authorities. In the case of hunting, only Namibian registered professional hunters and operators/outfitters are allowed to conduct hunting. The Directorate of Veterinary Services in Windhoek issues all veterinary permits. A strictly applied permit system thus already exists, hunting and trade in hunting trophies would continue to be strictly enforced.

Marking of animals/products: As is common practice already, and in the interest of facilitating control and law enforcement, hunting trophies are required to be sampled for DNA profiling. DNA samples are submitted to University of Pretoria for the inclusion in the RhODIS database. All horns are additionally allocated and marked with National serial numbers, and paperwork is traceable.

Customs and border control: Namibian Customs Officers check CITES, veterinary and transit permits. Where necessary, they refer to the Namibian Police or district veterinary officer.

Law enforcement: Law enforcement is a joint effort by the Ministry of Environment, Forestry and Tourism, the Protected Resources Division of the Namibian Police and the Customs Service. Law enforcement agencies rely primarily on information and well-established informer networks exist and are maintained.

8.3.2 Domestic

In Namibia, black rhinoceros is classified as Specially Protected Game (wild animals) under the Nature Conservation Ordinance 4 of 1975 as amended, and any rhino (or any portion thereof), as well as any product derived from a black rhinoceros is classified as a Controlled Wildlife Product under the Controlled Wildlife Products and Trade Act (Act 9 of 2008) as amended. This means that permits are required to be in possession of black rhinos or their parts, and for utilization, movement, imports and exports. Ample control measures are thus in place to ensure sustainable use and management of the black rhinoceros population, and preventing illegal trade from impacting on the national population. However, all black rhinoceros belongs to the State and Namibia does not import other subspecies.

8.4 Captive breeding and artificial propagation

No captive breeding operations have been registered in Namibia.

8.5 Habitat conservation

Almost 17% of the land surface of Namibia has been placed in proclaimed protected areas. A cornerstone of wildlife conservation philosophy in Namibia is that habitat loss, not trade, ultimately threatens all wildlife outside protected areas, and indirectly also a substantial portion of wildlife inside those areas - unless wildlife becomes more valuable than the land use systems that are threatening to replace them. The entire focus is therefore aimed at protecting black rhinoceros (and other wildlife) habitat outside protected areas, by providing people with appropriate incentives and benefits from sustainable utilization of wildlife populations. Altogether, about 46% of the land in Namibia is under conservation management or used for wildlife production comprising protected areas, communal conservancies (one of which holds white rhinoceros at present,) and freehold land used for wildlife production and tourism. Few other countries have such a high proportion of wildlife habitat for large mammals under conservation management.

8.6 Safeguards

All populations transferred from Appendix I has to be first included in Appendix II (Resolution Conf. 9.24 (Rev. CoP17) Annex 4 Precautionary measure A.1.)). The scope of this proposal is limited to once off

trade in the rhino horn stockpile, owned by the Government, which could be seen as a precautionary measure (Precautionary measure A.2.iii).

Extensive monitoring systems are in place and all forms of utilization and trade are subject to strict permit control. Significant penalties apply to infractions. There is an up to date national management strategy for this species.

9. Information on similar species

Parts of horn are not readily distinguishable from the horns of other species of rhinoceros. Trade is not contemplated in anything except once off trade in horn stockpile. All horns and pieces will be required to be marked as described already.

10. Consultations

This proposal is only applicable to the Namibian population.

11. Additional remarks

The increasing financial burden caused by the increase in the threat of illegal killing (Chanyandura et al., 2021) needs to be addressed through the sustainable use of black rhinoceros.

Conservation benefit of trade

Utilization confers a real value on rhinoceros as a renewable resource and, when properly controlled, actively encourages conservation (t'Sas-Rolfes 1990).

Funds from the sale of horns are desperately needed to support Namibia's conservation efforts. Such funds would be used to maintain or improve the conservation management programmes on which the various rhinoceros species depend. Law enforcement, including anti-poaching and intelligence activities, is extremely expensive, and is unlikely, on its own, to succeed in the long term without the whole-hearted support of the local communities (Brooks & Hughes, 1993).

Conclusions

The conservation commitment, achievements and abilities of Namibia have been more than adequately demonstrated over the past 50 years, in having successfully restored this species to Namibia after it became extinct in the late 19th century.

Namibia fully supports every effort at all levels to stamp out the illegal trade in rhinoceros products and has pledged its full cooperation with all involved in such actions. At international level, Namibia has made strenuous efforts to stop illegal trade and has been successful in supressing illegal killing.

This proposal therefore is simply a down listing proposal, with no consequential actions being implemented other than to trade once-off in raw horn which in turn will enhance the conservation of the species and its habitat.

12. References

Brooks, P.M. 1989. Conservation plan for black rhinoceros Diceros bicornis in South Africa, the TBVC States, and SWA/Namibia. Unpublished Report: 28pp.

Brooks PM and Hughes GR. Proposal for the Transfer of South Africa's population of the white rhinoceros *Ceratothenuim simum simum* from Appendix I to II. November 1993.

Buys, D. 1988. A summary of the introduction of white rhinoceros onto private land in the Republic of South Africa. Unpublished Report to NPB: 11pp.

Eikelboom, J.A.A., & Prins, H.H.T. (2024). Poaching pressure on African rhinos is still at an all-time high. Science Advances, 10(25).

Chanyandura, A., Muposhi, V.K., Gandiwa, E., & Muboko, N. (2021). Ecological and conservation dynamics of rhino populations. *Ecology and Evolution, 11*, 5892.

Emslie, R. and Brooks, M. (1999) African Rhinoceros, Status Survey and Conservation Action Plan. IUCN/SSC African Rhinoceros Specialist Group. IUCN, Gland, Switzerland and Cambridge, UK. Ix + 92 pp.

MET (2012). White Rhinoceros Species Management Plan for Namibia. Ministry of Environment, Forestry and Tourism, Republic of Namibia, April 2012.

MET (2018) White Rhinoceros Management Strategy. Ministry of Environment, Forestry and Tourism, Republic of Namibia, 2018.

MET (2022) White Rhinoceros Management Strategy. Ministry of Environment, Forestry and Tourism, Republic of Namibia, 2022.

MET (2022) Black Rhinoceros Management Strategy. Ministry of Environment, Forestry and Tourism, Republic of Namibia, 2022.

Owen-Smith, N. 1973. The behavioural ecology of the white rhinoceros. PhD thesis, Univ. of Wisconsin, USA.

Owen-Smith, N. 1988. Megaherbivores: The influence of very large body size on ecology. Cambridge University Press.

Rubino, E.C., & Pienaar, E.F. (2020). Rhinoceros ownership and attitudes towards legalization of global horn trade within South Africa's private wildlife sector. Oryx, 54(2), 244–251. https://doi.org/10.1017/S0030605318000030

Shortridge G.C. (1934). The Mammals of South West Africa. Vol I & II. William Heineman Ltd., London.

Taylor, W.A., Balfour, D., Brebner, K., Coetzee, R., Davies-Mostert, H., Lindsey, P.A., Shaw, J., & 't Sas-Rolfes, M. (2017). Sustainable rhino horn production at the pointy end of the rhino horn trade debate. *Biological Conservation.*

T'Sas-Rolfes M. 1990. Privatizing the rhinoceros industry. Dissertation for B. Comm. Hons, Univ. Witwatersrand, South Africa

Zhu, A.L. (2019). China's rosewood boom: A cultural fix to capital overaccumulation. *Annals of the American Association of Geographers, 110*(1), 277–296.

Zhu, A., & Zhu, G. (2020). Understanding China's wildlife markets: Trade and tradition in an age of pandemic. *World Development, 136*, 105108