

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA**

FRIENDS OF ANIMALS and ZIMBABWE
CONSERVATION TASK FORCE,

Plaintiffs,

v.

DAN ASHE, in his official capacity as
Director of the U.S. Fish and Wildlife Service,
SALLY JEWELL, in her official capacity as
U.S. Secretary of the Interior,
CONSERVATION FORCE, DALLAS
SAFARI CLUB, and REPUBLIC OF
NAMIBIA, MINISTRY OF ENVIRONMENT
AND TOURISM,

Defendants.

No. 15-cv-00653

Judge Amy Berman Jackson

**Declaration of Republic of
Namibia, Ministry of
Environment and Tourism**

**DECLARATION OF REPUBLIC OF NAMIBIA,
MINISTRY OF ENVIRONMENT AND TOURISM**

I, Simeon N. Negumbo, on behalf of the Ministry of Environment and Tourism (“MET”) of the Republic of Namibia, under penalty of perjury pursuant to 28 U.S.C. § 1746, make the following declaration in support of the motion to intervene in this suit by Conservation Force, Dallas Safari Club, and MET.

1. I make this declaration based upon my personal, first-hand knowledge.
2. I represent MET, which is responsible for recovery and protection of the black rhino.
3. Namibia’s recovery strategy for black rhino incorporates biological management and regulated hunting. Rhino to be hunted are “certified” by a special team of MET personnel as post-reproductive or problem animals. The purpose of removing certified rhino is to manage

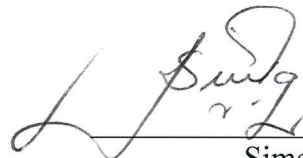
population densities so as to increase productivity, and to keep troublesome black rhino from disrupting the health of the herd. Offtake of black rhino is limited to no more than five per year, which is our CITES-authorized export quota.

4. Funds generated from black rhino permits are placed in the Game Products Trust Fund. They are maintained in a separate account and may only be used for the benefit of black rhino. These funds are used for anti-poaching, recovery, and community benefits. The \$350,000 raised by the Dallas Safari Club Conservation Auction was directed to law enforcement training and equipment, an anti-poaching intelligence system, and a survey of the black rhino population (Namibia's largest) in Etosha National Park.

5. MET tries to maximize revenue from the black rhino that are hunted. Black rhino protection and management is expensive, so this revenue is very important. Poaching is a growing concern, and our law enforcement expenses will likely grow as well. This suit threatens Namibia's successful recovery strategy, upon which the black rhino's survival depends, because it threatens to decrease the interest of American hunters if they cannot obtain U.S. import permits and reduce the amounts they are willing to contribute to the Game Products Trust Fund. If the plaintiff succeeds, black rhino will still be hunted, but there will be less revenue for their recovery. The rhino would be worse off.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Date: June 12, 2015



Simeon N. Negumbo

