



United States Department of the Interior



FISH AND WILDLIFE SERVICE
International Affairs
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In Reply Refer To:
FWS/AIA/DMA

SEP - 7 2018

Memorandum

To: The File

From: Chief, Branch of Permits, DMA

Subject: Enhancement finding for the import of a sport-hunted black rhinoceros trophy taken in Namibia during 2017 (PRT-31792C)

Background: On April 17, 2017, Mr. Lacy Harber, Denison, Texas, submitted an application to the U.S. Fish and Wildlife Service (Service) requesting authorization to import a male black rhinoceros (*Diceros bicornis*) trophy taken in February 2017 in Namibia. The black rhinoceros is listed in Appendix I of the Convention on International Trade in Endangered Species of Wild Fauna and Flora (CITES) and as endangered under the U.S. Endangered Species Act (Act). The Act prohibits any person, subject to the jurisdiction of the United States, from conducting certain activities with any endangered species listed under the Act [50 CFR 17.21]. These activities include, among others, import, export, take, interstate or foreign commerce, and apply equally to both wild and captive populations. Otherwise prohibited activities may be permitted, but only if the Service finds that the activity is for purposes that enhance the propagation or survival of the affected species and is determined to be consistent with the purpose of the Act [Section 10(d)]. The primary purpose of the Act is the conservation and continued existence of wild populations of endangered species and the ecosystem on which they depend [Section 2]. Therefore, it is a requirement of the Act and its implementing regulations that the proposed activities of the applicant reduce the threat of extinction or benefit the species in the wild. The issuance criteria at 50 CFR 17.22(a)(2) must be met for a permit to be issued. After reviewing the available information, this office is **able to find** that the importation of a sport-hunted black rhinoceros trophy taken in Namibia in 2017 enhances the survival of the species.

Status: The black rhinoceros was first listed in CITES as Appendix II in 1975 and subsequently moved to Appendix I in 1977. The species was listed as endangered under the Act on July 14, 1980. The species has also been categorized as Critically Endangered in the IUCN Red List of Threatened Species since 1996. At the end of the 1960s, the population was in decline, with an estimated number of 70,000 animals in four to seven subspecies populations. The decline increased, continued through the 1970s and 1980s to a point where the wild population of black rhinos (all subspecies) reached a low of 2,410 in 1995 (Emslie 2012). Conservation efforts, such as domestic and international trade bans, as well as monitoring programs and anti-poaching efforts resulted in an increase to 5,250 individuals as of 2015 (Emslie et al. 2016).

The subspecies *D. b. bicornis* ranges from Angola through Namibia and Botswana to western South Africa. In 2012, Namibia held approximately 93% (1,769 animals according to Namibia's Ministry of Environment and Tourism) of all specimens of this subspecies (Milliken, Emslie, and Talukdar 2009). Of the 1,769 black rhinos identified in 2012 as being in Namibia, 1,147 were on protected areas (i.e., parks and reserves), 212 were in communal areas, and 410 were on private lands through a custodial program (Ministry of Environment and Tourism 2012).

At the 17th Meeting of the CITES Conference of the Parties (CoP17 – Johannesburg 2016) the IUCN SSC African and Asian Rhino Specialist Groups and TRAFFIC provided a status report on the conservation status of African and Asian Rhinos. According to this report, the Namibian population of black rhinos was estimated at 1,946 individuals as of December 2015 with an increasing population trend. Though poaching levels in Namibia were reportedly low (130 poaching mortalities between 2006 and 2015) significant increases in poaching incidents occurred in 2014 and 2015 (Emslie et al. 2016).

The typical lifespan of a black rhino is about 30 to 35 years (Kurnit and Myers 2009). Males typically are solitary, while females may be accompanied by their dependent young for up to 4 years (Kurnit and Myers 2009). Normally, a single young is born. While not territorial, they maintain home ranges that vary in size from 2.6 to 133 km² (Kurnit and Myers 2009). The black rhino has a reputation for being extremely aggressive, and charges readily at perceived threats. They have even been observed to repeatedly charge inanimate objects. Black rhinos will fight each other, and they have the highest rates of mortal combat recorded for any mammal: about 50% of males and 30% of females die from intra-specific, combat-related injuries (Berger 1998). There have been indications that aggressive males may be a population-limiting factor in some areas and removal of these individuals may lead to a population increase and greater survivability. Adult rhinos have few natural predators, due to their imposing size as well as their thick skin and deadly horns.

Threats to species: Poaching, primarily to harvest the horn for the illegal international trade, is the main conservation threat (Emslie 2012). Rhino horn has two main uses: ornamental (for example, in the handles of Jambiyas or daggers worn in certain Middle East countries) and traditional Chinese medicine. Rhino horn use in non-traditional medicine (supposedly to cure cancer) has recently increased as well. Civil unrest and the associated abundance of weapons are also major conservation threats to the species as a whole. Effective field protection has been critical (Emslie 2012). In Namibia, increasing efforts are being made to integrate local communities into conservation efforts (Brodie et al. 2011). A significant number of rhinos have been placed on private lands with “custodians” in a cooperative conservation effort that also serves to expand the rhino habitat (Black Rhino Conservation Strategy for Namibia, rev. 2017).

CITES: At the 13th Meeting of the Conference of the Parties to CITES (CoP13 – Bangkok 2004), Namibia submitted a proposed resolution that would establish an annual export quota of five black rhinoceros. Based on the documents presented, the Parties adopted the resolution, combined with an amended proposed resolution submitted by South Africa (Resolution Conf. 13.5).

At the 14th Meeting of the Conference of the Parties to CITES (CoP14 – the Hague 2007), Kenya submitted a proposed resolution that reduced or eliminated the annual quota established in Resolution Conf. 13.5. In considering the proposal, the Parties only made minor changes to the resolution, but did not reduce the quota level. In support of maintaining the quota, on behalf of TRAFFIC, the CITES Secretariat submitted *Rhino-related Crimes in Africa: An Overview of Poaching, Seizure and Stockpile Data for the Period 2000-2005* (CoP14 Inf. 41, <http://www.cites.org/common/cop/14/inf/E14i-41.pdf>). With regard to Namibia, the report stated:

“Swaziland and Namibia are two range States that have managed to reduce the occurrence of poaching to minimal levels (or zero in the case of Swaziland). In addition, Namibia has played a major role in intercepting horn in transit from neighboring countries, whilst enforcement deterrents appear to have greatly reduced the transit of horns through Swaziland. As a result of low poaching threat and effective metapopulation management, the rhino populations in these countries are growing at some of the highest rates in Africa.”

“Of all African rhino range States, Namibia arguably has the most positive assessment for management effectiveness: one of the highest rhino population growth rates (over 6% annual growth in most populations between 2003 and 2005); very low poaching intensity (only 2.7% of detected mortalities caused by illegal killing during 2000-2006) and impact (just 0.1% of the total population in 2003 killed illegally during 2002-2005); and the highest horn recovery rate.”

“With regard to black rhino trophy hunting in South Africa and Namibia, reconsideration of the quotas agreed at CoP13 (as requested by Kenya in CoP14 Doc 37.2) is not supported. Instead, the Secretariat’s recommendations contained within CoP14 Doc. 54, together with the additional recommendations mentioned above, are deemed appropriate to address contemporary rhino horn trade concerns.”

The CITES annual export quota for Namibia remained at five adult male black rhinoceros for 2017.

Management Plan: Namibia instituted a conservation strategy, the Black Rhino Conservation Strategy for Namibia, in 2003. Elements of the plan were updated in 2009 to address the issues and challenges. Namibia also provided an updated plan drafted in September 2017, noting that it was expected to be adopted by the end of 2017. Namibia has worked for many years developing a science-based management plan for the black rhino before having submitted their proposal for an export quota in 2004 at CoP13.

The Black Rhino Conservation Strategy for Namibia (January 2003, revised 2009 and 2017) contains very specific management goals in the area of range expansion, biological management, protection, policy and legislative frameworks, and capacity building and sustainability. The strategy establishes an annual planning cycle in a feedback loop, which is very similar to the Service’s strategic habitat conservation approach to sustainable management. To facilitate the strategy, a National Rhino coordinator and Rhino Management Committee were established. Given that all black rhinoceros in Namibia are owned by the central government, this Rhino Management Committee has significant influence and control over activities involving black

rhinoceros. This strategy provides a disincentive to poaching, directly benefits local communities, and results in increased community support for the presence of black rhino.

The strategy also addresses custodianship agreements that provide appropriate mechanisms for managing and monitoring species on private land. Successful implementation of action plans within these agreements provides the animals necessary for translocation and further expansion of the species. Between 2006 and 2009, an average of 50 rhinos per year were translocated to either custodial or protected areas. These numbers have stayed relatively constant since 2009.

In 2009, 116,464 km² was available to rhino conservation. Lands included 18,245 in protected areas (parks), 7,506 concessions, 85,104 in conservancies, and 5,609 private lands. Based on this area, the potential “carrying capacity” in Namibia is 8,793 black rhino. Between 2001 and 2012, the population of black rhino in Namibia increased from 735 to 1,769. It should be recognized that the ten-year target established in the Strategy plan was to increase the population to 1,500 animals by 2011. Of the 1,769 animals present in 2012, a significant number (622) were found on communal and private land (Ministry of Environment and Tourism 2012). The known number of poached black rhinos in Namibia has increased from 0.3% of the population in the years 2008-2013 to 3.3% of the population in the years 2013-2015 (Emslie et al. 2016). MET is working to combat poaching through a number of programs, including horn removal and increased law enforcement. Despite increased poaching, the black rhino population in Namibia is continuing to grow (estimated at 1,946 individuals in 2015), though poaching rates are approaching population growth rates.

The strategy also recognizes the need for populations to be managed to maintain high levels of breeding performance. The strategy is very responsive to recommendations from the IUCN/SSC African Rhino Specialist Group (AfRSG) of using trophy hunting to fund sustainable rhino management. The annual harvest rate of five animals is less than 0.3% of the total Namibian population, well below a recognized sustainable off-take of 1% annually. The removal of a limited number of males has shown to stimulate population growth in areas where it is evident that density dependent effects are repressing breeding and causing mortality. Hunting takes place on protected areas (i.e., national parks or reserves) as well as custodial lands under the direct control of the Ministry of Environment and Tourism. Custodianship beneficiaries are recognized as MET’s conservation partner in the protection of black rhinos, particularly in the area of providing additional habitat for translocated animals. Custodianship beneficiaries can also apply for funding from the Game Products Trust Fund to enhance conservation and protection of rhinos in Namibia.

The Ministry of Environment and Tourism has established a certification program for allowing limited trophy hunting on state owned hunting concession areas to support the rhino conservation program. Thus, trophy off-take can occur only after the MET has certified the area of take and authorized a rhino trophy. These certifications are limited both in number and in the areas for which they can be approved. The animals to be taken as trophies may only be “post reproductive” male animals and assumed to be beyond normal reproductive age that would be at about 30 years of age. Presumably, this means that these animals are well represented in the population.

Male bias in black rhino populations can have an adverse effect on productivity, gene flow, and immigration of younger males (du Toit 2006). Surplus animals can be captured for establishing founder populations, but post-reproductive males are not suitable for translocation as they become aggressive and express dominance over other rhinos, often killing females and calves as well as other males (Emslie et al. 2007; du Toit 2006). Biological effects of removing specific individuals from a population include reduced male fighting, shorter calving intervals, and reduced juvenile mortality (Emslie, Amin, Kock (ed.) 2009). Studies of population dynamics indicate that the removal of a limited number of surplus males from a self-sustaining population can promote more rapid growth of that population (Leader-Williams et al. 2005).

The need to protect populations from poaching and provide on the ground oversight, including 24-hour surveillance, may be prohibitively expensive. The sale of a surplus male trophy and the use of the funds derived from that sale will assist in providing the protection and oversight needed in the face of increased poaching, and serve to enhance the survival of the species.

Generated Revenue from Sport-hunting: As a requirement for any sport hunting of black rhinoceros, a significant contribution to the Game Products Trust Fund (GPTF) must be made. The GPTF was established through the Game Products Trust Fund Act (Act No. 7 of 1997) as a mechanism for ensuring that revenue obtained from the sale of wildlife products could be used exclusively towards wildlife conservation and community conservation and development programs aimed at harmonizing the co-existence of people with such wildlife, and thus securing a future for wildlife outside of and within protected areas in Namibia. A board of five (5) members from the Ministries of Environment and Tourism, Agriculture and Finance and two (2) community representatives, administrates the Fund. The objectives of the Fund are outlined in the Act as follows:

- to make grants to emerging conservancies and wildlife councils for the purposes of implementing and maintaining projects and programs, approved by the Board in consultation with the Minister of Environment and Tourism, regarding wildlife conservation and management and rural development;
- to allocate funds to conservancies, wildlife councils and protected areas, and to persons, organizations and institutions approved by the Minister, to be used in connection with projects and programs regarding wildlife conservation and management and rural development;
- to support measures aimed at improving the relationship between people and wildlife;
- to support improvements in the monitoring, management, protection, sustainable use and development of wildlife resources in rural areas.

Allocation of funds is based on priorities determined by the Board on an annual basis, and based on the principle of:

- returning funds to areas of origin of the wildlife products;
- supporting measures aimed at improving the relationship between people and wildlife;
- supporting improvements in the monitoring, management, protection, sustainable use and development of wildlife resources in rural areas; and
- striking a balance between the allocation of funds for rural development and for wildlife resource monitoring, conservation and protection.

Several projects that have been funded so far from money accrued from trophy hunting of black rhinos including:

- annual black rhino counts
- improved rhino crime investigation and prosecution on State, Community, and Private Lands - the main objective of this project is to improve crime scene procedures and techniques for the investigation and successful prosecution of poaching crimes.
- logging all rhino horns owned by the State on the Rhino DNA Index System (RHODIS) that aims at ensure the traceability of all rhino horn owned by the State.

The Board obtains technical assessments and advice on the feasibility and suitability of projects and programs regarding wildlife resource management and rural development from the MET, other ministries, and competent NGOs and individuals. In addition to hunting revenues, the fund has the following sources of funding: live export; head levies; sale of wildlife products (e.g., skins, ivory and live animals); trophy-hunting concessions in protected areas; trophy hunting of problem animals (elephant, leopard, lion); grants; and park entrance fees (25% used for park infrastructure only).

Specific bull taken: All known black rhinos in Namibia are ear-notched to assist in identification and a database is maintained. This is paramount to the proper selection of candidates for culling. The rhino taken by Mr. Harber was identified as the only remaining bull on Custodian Farm Veronica. The animal was selected for harvest due to its age (between 27 and 31 years) and to remove competition with younger bulls. This individual rhino was documented to have caused several mortality events when female and younger male rhinos were introduced to the farm with the intention of forming a breeding population. The MET decided to remove this post-reproductive male before any further introductions were attempted in this area. This animal fully meets the criteria established by Namibia as a valid candidate for culling and in doing so, will assist in maintaining optimal population growth in line with government objectives. In addition, Mr. Harber has donated \$275,000 to the Dallas Safari Club Foundation (DSCF) to support black rhino conservation in Namibia. A total of \$250,000 of this donation has been transferred to Namibia's Game Products Trust Fund (GPTF), and the remaining balance of \$25,000 will be transferred to the GPTF immediately upon receipt of the import permit. Mr. Harber paid separately for the professional hunter and services, so this entire sum will be directed toward black rhino conservation.

Comments received: When the Service published receipt of the very first black rhino trophy application in November of 2009 (a requirement under the Act), we received a number of positive comments. That import was supported by Namibian Association of Community-Based Natural Resource Management Support Organization, a national body of 14 NGOs and the University of Namibia that operates to support Namibia's communal area conservancies. The communal conservancy movement commenced in 1998 and has rapidly improved communities' perceptions of wildlife from one of opportunistic poaching for the pot to that of promoting the permanent presence and use of wildlife as a valued livelihood strategy.

World Wildlife Fund (WWF) also supported the import of the previous trophy. WWF has worked in Namibia for over 20 years and has provided technical support and assistance to MET on a range of programmatic and species activities, including monitoring black rhino populations;

expansion of rhino range to emerging communal area conservancies; and development of the National Black Rhino Management Plan. WWF stated that they believed the proposed import would enhance the species for several reasons. The quota is based upon sound scientific data, with only verifiable, post-reproductive or problem rhino bulls being selected for harvest. The removal of identified animals is done under close supervision of MET officials. The removal of selected bulls enhances the reproductive capacity of rhino populations by allowing younger, more sexually active bulls to fill territorial voids created by the removal of older, less productive bulls. Further, such removal reduces the expensive costs of monitoring and treating sick, old animals, allowing the government to allocate greater resources to productive animals. Income generated from the harvest of rhinos is being used in support of black rhino conservation, assisting MET in implementing its black rhino management plan and protecting against the potential onslaught of poaching. Finally, when harvest occurs within communal conservancies, a portion of the funding is dedicated to be returned to the area for conservation efforts. This financial return to the area will enhance conservancy and resident community awareness of the value of black rhino. While the Service received no comments from the Namibian Association of Community-Based Natural Resource Management Support Organization or WWF when we published this current application, we have no reason to believe that they have reversed their comments or views with regards to this application.

While the IUCN did not specifically comment on this trophy application, Namibia's black rhino program meets the recommendations and guidelines laid out in two IUCN documents: the IUCN SSC Guiding Principles on Trophy Hunting as a Tool for Creating Conservation Incentives, and the IUCN Sustainable Use and Livelihoods Specialist Group Briefing Paper, "Informing Decisions on Trophy Hunting" (IUCN SSC 2012, IUCN SULi 2016). The management program for black rhinos in Namibia is specifically referenced in each of the documents.

When the Service published the receipt of Mr. Harber's application in January of 2018, we received over 3,000 comments, including positive comments from organizations such as the Dallas Safari Club and Safari Club International (SCI). The SCI stated that a well-regulated hunting program benefits the species biologically by removing a limited number of surplus, post-reproductive males that no longer contribute to a viable breeding population. In addition, SCI stated that fees paid by hunters directly supports conservation and anti-poaching efforts in Namibia. SCI emphasized that providing resources for anti-poaching efforts and incentivizing local communities to protect rhinos and their habitat is the best deterrent against black rhino poaching.

Many of the comments received by the Service were in opposition to the issuance of this permit. The vast majority of these comments expressed their disagreement with authorizing the importation of the proposed trophy, but did not provide any substantive comments that addressed how the importation of this trophy would adversely harm or would not enhance the species in Namibia. The proposed import was not supported by several organizations including the Center for Biological Diversity (CBD), Humane Society of the United States (HSUS), Humane Society International (HSI), Animal Welfare Institute (AWI), and the Animal Legal Defense Fund (ALDF), all of which provided more substantive comments.

Some of the concerns cited by these organizations center around whether the import of the black rhino trophy into the United States from Namibia, in and of itself, constitutes enhancement of the survival of the species under the Act. There were concerns that granting this permit would undermine rhino conservation efforts, promote unsustainable commercialization of rhinos, and would violate the Service's duties under the Act and its implementing regulations. It was also stated that there was no proof showing the selected bull was "post-reproductive" and disagreed with the idea that removal of "post-reproductive" males was biologically necessary. Several commenters mentioned that the applicant and MET did not provide consistent numbers of those rhinos that were killed by this bull, or proof that these mortality events actually occurred. Several commenters stated that although MET gave specific indications about how the money would be used to benefit rhino conservation, there was no evidence provided that MET used the money in this way. With the recent increase in rhino poaching in southern Africa, concerns were also raised about the Service allowing imports of black rhinos for any purpose, including recreational hunting, until this issue is addressed and rhino populations are stable and secure. Commenters questioned the efficacy of Namibia's Black Rhino Conservation Strategy and MET's use of funds from GTPF in light of recent increases in poaching. Finally, it was the opinion of most of these commenters that the killing of an endangered species is unethical and not supported by a majority of the American people.

The Service recognizes that it may be difficult to see how the act of importing a sport-hunted black rhino trophy, when evaluated on its own, would constitute enhancement under the Act. However, before making its decision to grant or deny such a permit, the Service takes into account the following: the overall conservation and management programs implemented by a given government entity; the funds generated by sport-hunting; how these funds are utilized to manage, protect, and conserve a given species; and the status of the species in the wild (e.g., population estimates and distribution). The Service also takes into account the impact of other stakeholders when incorporated into the overall conservation effort for a given species.

The Namibian government instituted a conservation strategy for the black rhino that contains specific management goals involving range expansion, biological management, anti-poaching efforts, legislative and policy frameworks, as well as capacity building and sustainable utilization. As part of a sound management program, the Service believes that sport-hunting can have a positive effect on the overall conservation efforts towards preserving, sustaining, and increasing rhino populations in Namibia. The money that hunters have paid or intend to pay, generated from few select hunts of surplus males, provides much needed funding to further assist the Namibian government in conserving and protecting its rhinos. This money allows for increased enforcement efforts to combat the ever-growing threat from poachers and the increasing demands for rhino horn in the black market. The Service does not agree with past assertions that an applicant is exempt from the prohibitions under the Act if they are willing to pay for the privilege to hunt a rhino while making a payment to conservation. Without the proper framework in place to ensure Namibia's rhino population is being managed and conserved sustainably, the Service would be unable to find that the import of such a trophy would enhance the survival of the species, regardless of the amount of money someone was willing to spend to hunt and import such a trophy. A significant portion of the money generated by the sport-hunting of rhinos is required to be put into the GPTF, a fund established through the Game Products Trust Fund Act of 1997. In the case of Mr. Harber, \$250,000 has been deposited

into this account and an additional \$25,000 will be deposited upon issuance of an import permit. This is a mechanism to ensure that the revenue generated from the sale of these hunts is used to benefit wildlife and community conservation and development programs designed to encourage the co-existence of people with wildlife. This approach provides local communities with a stake in securing the continued existence of rhinos and other wildlife both within and outside of protected areas in Namibia. Also, the Service does not believe that allowing the import of a sport-hunted trophy for one's own personal use will lead to unsustainable commercialization of the black rhino as the hunter is prevented by regulation from selling their trophy after the import has occurred.

Some commenters expressed concern over the process of selecting post-reproductive bulls for culling, which appears unfounded. According to the Ministry of Environment and Tourism, a certification program allows for limited trophy hunting on state owned hunting concession areas that support their rhino conservation program. The animals to be taken are identified as "post reproductive" males and they are confirmed to be beyond normal reproductive age, 28 to 30 years old. Although such specimens may still be capable of reproducing, they appear to be well represented in the population as a whole based on their age. Because of the aggressive nature of black rhinos, they are known to fight each other and have the highest rate of mortality involving combat related injuries of any mammal (Berger 1998). There are indications that aggressive males can be a limiting factor in population growth as well (du Toit 2006). This particular individual was described by MET as causing violent fights resulting in mortalities of several young rhinos that had been introduced to start a breeding population. In this small subpopulation as well as at the metapopulation level, the biological effects of removing a select few surplus males from a population can potentially lead to a population increase and greater survivability. This can be demonstrated by the increase in Namibia's black rhino population from a population of 735 animals in 2001 to over 1,900 animals in 2015. Under the conservation strategy established by the Namibian government, a ten-year time frame was established to increase the population of black rhinos to a level of 1,500 animals by 2011, a level exceeded by more than 200 animals by 2012. The success of Namibia's management program for the black rhino supports their approach towards conserving and maintaining a sustainable, healthy, and increasing rhino population in Namibia.

Increased poaching of Namibian black rhino (estimated at 3.3% of the population between 2013 and 2015, up from 0.3% from 2008-2012) is a major threat to the population (Emslie et al. 2016). In their 2017 draft black rhino management strategy, MET recognizes this additional strain on the population and lays out goals for the future of the population as well as ways to mitigate the threat posed by poaching. The mission of the management strategy is to re-establish black rhino in viable, healthy breeding populations throughout its former range by 2030. They aim to have a metapopulation that continues to show positive population growth, and plan to achieve this through activities such as expansion of range, protection against illegal killing and natural mortalities, developing policy, and building conservation support and awareness in Namibia. The strategy proposes concrete measures to combat poaching such as potentially establishing a dog detection and tracking unit, zoning reproductive animals to areas of higher security, working with neighboring land owners, and developing and implementing a dehorning policy. MET aims to improve legislation, investigation, prosecution, and sentencing of poachers. The costs of

protecting black rhino populations can be expected to continue rising, and existing revenue streams from tourism and trophy hunting may not be sufficient to cover them.

The Service recognizes that sport-hunting of an endangered species is viewed by some as unethical and is not supported by a portion of the American people based on the past and current letter writing petitions received. The Service acknowledges that sport-hunting of any animal stirs strong public opinion and emotions. However, in reviewing this request for a permit to import an endangered species, the Service is obligated to review the overall management program that is in place, the current biological data and population estimates, anti-poaching efforts, and the funding mechanisms in place to ensure a sustainable approach to rhino conservation. As part of a sustainable program, sport-hunting can play an important role in the conservation and protection of black rhino when a sound biological approach is undertaken and when revenue generated from the taking of an animal is utilized to further rhino conservation. The Service, in reviewing Namibia's conservation strategy for black rhino, is satisfied that the Namibian government is managing their population in a manner that will ensure the long term viability of their population, and that the funds generated from sport-hunting will be used to further conservation efforts and increase anti-poaching operations in country.

Conclusion: Based on the success of implementing the Black Rhino Conservation Strategy for Namibia and the ongoing assessment of the country's management plan, the use of funds generated from black rhino hunts, and the biological need for such harvests, the Branch of Permits has found that the import of this sport-hunted black rhinoceros from Namibia, taken as part of the national strategy and under the selection criteria established for culling, meets the criteria for issuing an import permit under the Act. Specifically, Mr. Harber's trophy has been taken under the auspices of the national strategy and the \$275,000 contribution to the GPTF will greatly assist in black rhino conservation efforts (other funds, such as charges by the Namibian safari outfitter that could benefit local communities, is not included in this money). The hunted specimen was chosen under a strict scientifically-based selection process, and as such, the import of this trophy should be authorized. While this finding applies only to the current application, the review of any future applications to import sport-hunted black rhinoceros trophies will be based on the most current information and any new information obtained in the future.

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