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Paragraph no. 28 (wildlife trade) in the European Parliament's resolution on the Biodiversity Strategy for 2030

Dear MEP,

We write to you on behalf of the Namibian Association of CBNRM Support Organisations (NACSO), a consortium of nine Namibian civil society organisations that work together to support, promote, and strengthen community-based natural resource management (CBNRM). We took note of paragraph no.28 (wildlife trade) of the ENVI's draft report ([link](#)) on the EU Biodiversity Strategy for 2030 and we wish to express our serious concerns about the wording of this paragraph.

Paragraph 28

'Reiterates its call for a full ban on the trade in both raw and worked ivory to, from and within the EU, including 'pre-convention' ivory and rhino horns, and asks for similar restrictions for other endangered species, such as tigers''.

The text of paragraph no. 28 jeopardises our successful community-based approaches to wildlife conservation, which benefit livelihoods and local economies by calling for:

- a ban on the import of elephant trophies into the EU because the term *"full ban on trade in ivory"* is used and trophies are included even though it's non-commercial trade.
- asking *"for similar restrictions to other endangered species"* without any kind of scientific assessment taking into account that this is broad enough to include all species (including plants) loosely defined as *"endangered"* for scientific, educational, and conservation purposes.

It is unfortunate that the draft text does not recognise the value and the benefits of wildlife trade to the conservation of species and local communities in Africa. Instead, the text refers to 'trade' without making a distinction between commercial and non-commercial trade. We wish to highlight that the term 'trade' in the EU CITES regulatory framework encompasses both commercial and non-commercial trade (private transportation and ownership). Hence, we recommend that the word 'commercial' is added in the relevant parts of paragraph no. 28 making sure that the movement (trade) of elephant trophies would not be affected.

Further, there is widespread misconception that banning elephant hunting outright, or banning elephant hunting imports, will help Africa's elephants. On the contrary, a ban on elephant hunting trophies would have catastrophic consequences for elephants. In general, unjustified bans and restrictions of wildlife trade reduce the value of wildlife, especially when species like elephants are prone to destroy crops and thus increasing human-wildlife conflict and illegal killing.

Further, if the European Parliament is asking “for similar restrictions for other endangered species”, this would have wide-ranging ramifications for the trade in any endangered species, including plants, for scientific, educational, and conservation purposes. Of course, some groups would like to apply this to restrict the successful model of sustainable use (including hunting) in southern African countries, and that would be bad news for African people, wildlife, and local economies.

Any policy or political decisions from Brussels affecting people in Africa should take into consideration how we live with and manage our wildlife. Imposing unfair bans or restrictions of wildlife trade impedes the African communities from conserving their natural resources according to their own conservation, management, and governance systems. This is surely not the intention of the European Parliament?

There must be recognition of local communities and indigenous people’s rights to sustainably use and manage their natural resources and their enjoyment of these rights.

Yours faithfully,



Maxi Pia Louis

NACSO

Director