

**From:** Christopher Brown <ceo@n-c-e.org>

**Sent:** Tuesday, March 10, 2020 10:57 AM

**Subject:** [External] Negative impacts of bans on products and trophies from lawfully hunted game - views from Namibia

[External]

Dear Honourable Legislators,

I write as a conservation ecologist having spent my entire conservation career working in Southern Africa, in government for 15 years (research scientist, then Director of Environmental Affairs in the Namibian Government), in the private sector for 20 years (shareholder and Board member of the largest private tourism company in Namibia (Gondwana Collection, which owns 19 lodges and about 155,000 ha of conservation land) and as a 33% owner of an aerial photographic wildlife survey company with three aircraft (Bushskies Aerial Photography)) and some 16 years in the environmental non-governmental sector (Director of the Namibia Nature Foundation and currently CEO of the Namibian Chamber of Environment).

The Namibian Chamber of Environment ([www.n-c-e.org](http://www.n-c-e.org)) is an umbrella NGO representing the interests of the environmental sector in this country. We currently have 65 member organisations which is essentially all the environmental NGOs in the country. The views which I express below and those attached are supported by all these members. I should also declare that I am not a hunter, nor have I ever been. We get no funding from hunting organisations. My interests are exclusively what is best for conservation and for creating incentives for land under wildlife, natural vegetation and biodiversity, preferably at large landscape scale.

A ban on the import, sale and transfer of lawfully hunted game products and trophies will have a significant negative conservation impact on those parts of Africa where wildlife is well managed and has stable or increasing populations, but will unfortunately have no positive impact on those countries where wildlife is declining. The reason is that in countries with stable and increasing wildlife such as Namibia (which has more wildlife today than at any time in the last 150 years), the policy environment devolves rights over wildlife to local land owners and custodians (community groups). As such, wildlife has value – for tourism, meat production, sale of surplus live animals and trophy animals. This combination of uses means that wildlife is a very competitive form of land use – it earns more for the farmer than does that same land under cattle or small domestic stock. Thus, market drive a vibrant wildlife economy, which also protects indigenous habitats and biodiversity. Further, land owners can make more revenue by working collaboratively across larger landscapes. This is good for ecosystem resilience, connectivity and climate change mitigation. More and more land is coming under wildlife in Namibia and neighbouring countries through this economic, market driven policy approach. By contrast, countries that have a more Eurocentric approach to wildlife, where the game is owned by the state and landowners and custodians have to carry the costs of living with wildlife, but receive no benefits and have no rights, these landowners and custodians have no interest in looking after the wildlife. This is the situation that prevails in all African countries where wildlife is declining or already locally extinct. In fact, a tragedy of the commons applies, where people poach (illegally harvest) either for commercial or subsistence purposes. The whole situation can be equated to a supermarket. We condone the legal purchase of goods, which creates profit for the supermarket owner to provide a good service with fresh stock. We condemn shoplifting, which undermines the whole system. Legal hunting for trophies and meat puts funds in the hands of owners and custodians which in turn is invested into the wildlife and land management, while illegal hunting (poaching) undermines the whole system. It is also important to note that wildlife populations typically breed at 25-35% per year. Animals have to be removed annually to keep the vegetation (both graze and browse) in a healthy ecological state. Trophy hunting removes about 1% of the wildlife population in Namibia per year – much less for elephants, where it is only about 0.2%. Most other surplus animals are removed for meat, where the returns per animal are far lower. It is also important to recognise that only a small part of a country is suitable for tourism, and that tourism cannot replace the income from trophy hunting over the majority of Namibia.

In summary, it is not legal hunting that is impacting wildlife populations in countries where wildlife is on the decline – most of those countries do not in fact have legal hunting. Rather, it is poaching and land transformation. So stopping legal hunting and the import of trophies, and sale and transfer of game products will do nothing to address the situation in those countries that are failing to conserve their wildlife properly, but will severely impact on the good countries by making wildlife less competitive as a land use option.

The issues are more fully explained in the two attached articles. I would be happy to engage further on this subject if you would find that helpful.

Yours sincerely,  
Chris

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