

14 October 2016

Dr. Moses Maurihungirire
The Permanent Secretary
Ministry of Fisheries and Marine Resources
Private Bag 13355
Brendan Simbwaye Square, Block C
Windhoek
Namibia
Email: mmaurihungirire@mfmr.gov.na

Subject: Concern over potential impacts on biodiversity as a result of live-capture and export of seabirds (penguins), cetaceans (dolphins and whales) and pinnipeds (fur seals) taken from Namibian waters.

Dear Dr. Maurihungirire,

The IUCN Species Survival Commission (SSC) has seen recent media reports and an open [letter](#) from the Namibian Environment & Wildlife Society referring to the proposed capture of seabirds (penguins), cetaceans (dolphins and killer whales) and pinnipeds (fur seals) in Namibian waters, apparently for export to China. By this letter, I wish to request more information on these plans. Like Namibia, IUCN is committed to the view that any utilization of wild species should be sustainable. It would very helpful to understand what plans Namibia has to ensure that any exports to China are based on the principle of sustainable use. We also note that for all species that are listed on CITES Appendix II, such as Fur Seals *Arctocephalus* spp., Killer Whales *Orcinus orca* and Bottlenose Dolphins *Tursiops truncatus*, non-detriment findings will need to be made demonstrating the sustainability of any planned harvests prior to the issuing of any export permits.

I would in particular like to draw your attention to the situation with the African Penguin *Spheniscus demersus*, which is listed as Endangered in the IUCN Red List of Threatened Species because of its very rapid ongoing population decline. Given this rapid decline, it is probably impossible to harvest this species sustainably at the present time.

In order to plan for sustainable use, credible data will be needed on population size and ecology for at the populations of the targeted species in Namibia, as well as in the wider southwest Africa region (assuming that many of these populations cross borders). This would ensure that a rigorous assessment of the effects of deliberate removals would be possible.

One of the news articles suggests that the proposal attempts to justify captures of seabirds and marine mammals as a way of slowing declines in fisheries production. This argument, which

includes many assumptions, has been discredited by many independent studies. The food webs of the Benguela system are complex, prey species are numerous and the life histories of many top predators make them vulnerable to poorly managed exploitation. Assessing the potential ecological and population consequences of the proposed removals would require many years of well-designed research.

The IUCN and SSC networks stand ready to support you in your efforts to ensure that ANY proposal to capture marine species in Namibian waters for export receives appropriate and objective scrutiny and that the best interests of the Namibian marine environment are carefully considered.

The chairs of the IUCN SSC Cetacean Specialist Group, Dr. Randall Reeves, and Penguin Specialist Group, Dr. Dee Boersma and Dr. Pablo Borboroglu, have assured me that members of their groups are available to assist in your efforts to evaluate the potential impacts of these proposed captures on Namibian cetaceans and penguins. Please do not hesitate to contact me (e-mail: jonpaul.rodriguez@iucn.org), Dr. Reeves (e-mail: rrreeves@okapis.ca), Dr. Dee Boersma (e-mail: boersma@uw.edu) or Pablo Borboroglu (e-mail: globalpenguinsociety@gmail.com) if you have any questions.

Thank you for your attention to this matter. I look forward to hearing from you.

Sincerely

A handwritten signature in blue ink that reads "Jon Paul Rodríguez". The signature is stylized and includes a large flourish at the end.

Jon Paul Rodríguez, Ph.D.
Chair
IUCN Species Survival Commission

- cc. Permanent Secretary of the Ministry of Environment and Tourism, Dr. Malan Lindeque (malan.lindeque@met.gov.na)
Minister of Environment and Tourism, Hon. Pohamba Shifeta (meriam.tjaimi@met.gov.na)