



January 23, 2020

**RE: CALL FOR EVIDENCE ON THE SCALE AND IMPACTS OF THE IMPORT AND EXPORT OF HUNTING TROPHIES**

Dear Honorable Theresa Villiers,

Dallas Safari Club (“DSC”) is appreciative of the opportunity to comment and provide evidence to the United Kingdom’s (“UK”) Department for Environment, Food and Rural Affairs (“DEFRA”) consideration of options on the future of UK hunting trophy imports and exports. The four options being considered are:

- a ban of the import and export of hunting trophies from certain species;
- stricter requirements to demonstrate clear benefits to conservation and local communities before hunting trophies from certain species are permitted to enter or leave the UK;
- a ban on all hunting trophies entering or leaving the UK; or
- continuing to apply current controls based on internationally agreed rules.

DSC, like the UK, is categorically opposed to any measures that would undermine conservation efforts and negatively impact local community livelihoods. Therefore, DSC opposes any options making the import and export of hunting trophies more burdensome or banned all together because of the immense role legal, regulated hunting plays in international wildlife conservation.

**LEGAL, REGULATED HUNTING IS A FUNDAMENTAL CONSERVATION TOOL**

**UNITED STATES**

The United States (“US”) is a pillar in the international conservation community with sportsmen and women representing an integral part of the North American Model of Wildlife Conservation. In 2019 alone, \$872 million was generated by hunting licenses, \$797 million was generated by the Pittman-Robertson Fund (hunting and recreational shooting-related excise taxes), \$724 million was generated from fishing licenses, and \$632 million was generated by the Dingell-Johnson/Wallop-Breaux Fund (fishing and boating related excise tax).<sup>1</sup> These funds are used to fund state fish and wildlife agencies and other conservation efforts. From 1939–2019, sportsmen and women have provided over \$62.1 billion in necessary funding for state-level fish and wildlife agencies charged with overseeing their state

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<sup>1</sup> Congressional Sportsmen’s Foundation, *2019 Year in Review*, p. 33 (“CSF 2019”).

conservation programs.<sup>2</sup> This critical funding generated by sportsmen and women represents 60% of state fish and wildlife agency funding.<sup>3</sup>

Game specie populations in the US have impressively been recovered as a result of the North American Model of Conservation (*see* Figure One). Moreover, apart from the immense success of the North American Model of Conservation, hunter funded organizations have been at the forefront of North American conservation efforts. For example, Big Horn sheep populations plummeted from roughly one million in 1800 to fewer than 25,000 by 1950.<sup>4</sup> Hunter funded organizations have secured hundreds of thousands of hectares of habitat through contributions in excess of \$100 million, and as a result, the Big Horn sheep population has rebounded to over 80,000.<sup>5</sup>

Figure One – Population Trends of US Big Game Species<sup>6</sup>

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<sup>2</sup> CSF 2019, p. 33.

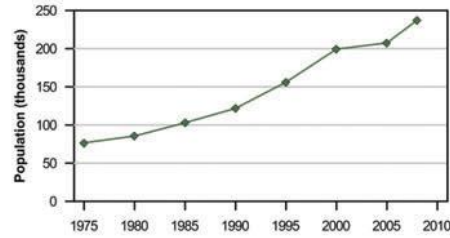
<sup>3</sup> CSF 2019, p. 33.

<sup>4</sup> International Union for Conservation of Nature, *Informing decisions on trophy hunting: A Briefing Paper regarding issues to be taken into account when considering restriction of imports of hunting trophies*, p. 14 (“IUCN 2016(a)”)

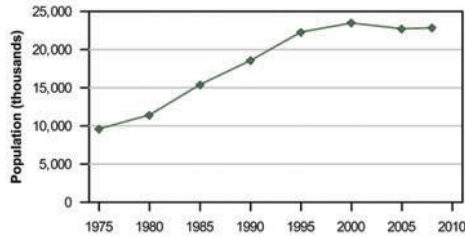
<sup>5</sup> IUCN 2016(a), p. 14.

<sup>6</sup> Flather, C., et al., *Wildlife Population and Harvest Trends in the United States: A Technical Document Support the Forest Service 2010 RPA Assessment*, p. 18.

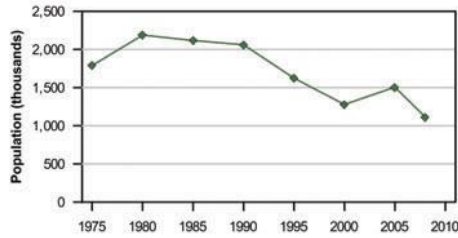
**American black bear**  
(n=19)



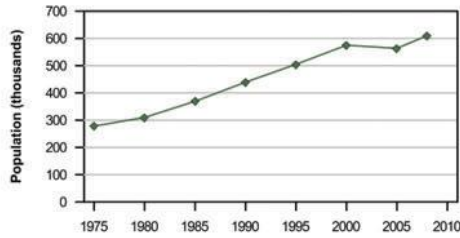
**White-tailed deer**  
(n=29)



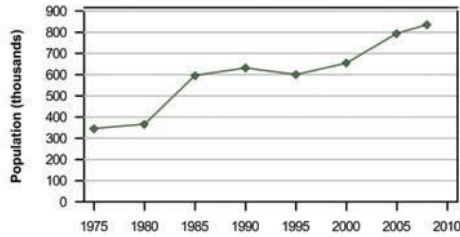
**Mule deer**  
(n=9)



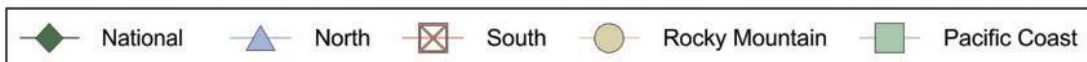
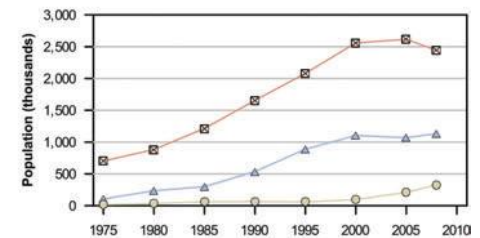
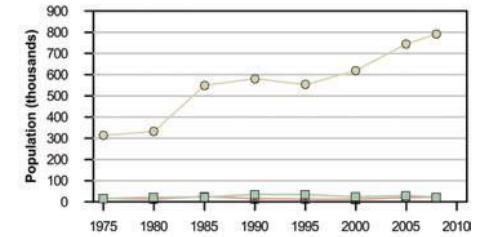
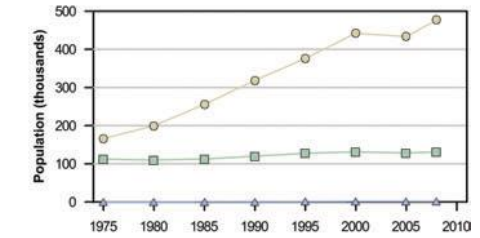
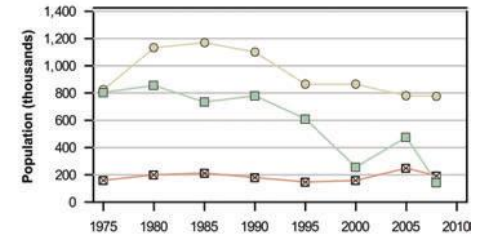
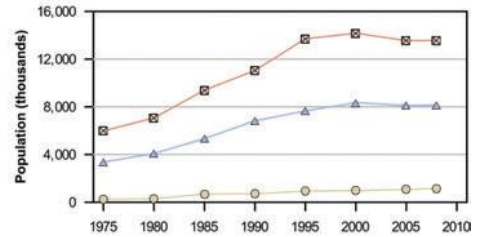
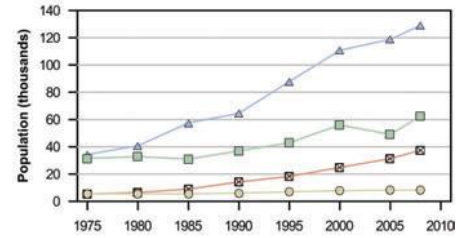
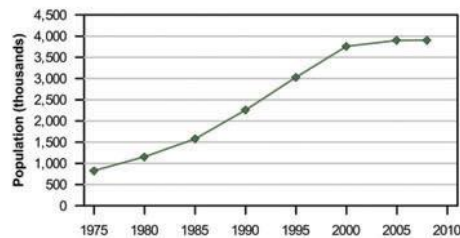
**Elk**  
(n=14)



**Pronghorn**  
(n=14)



**Wild turkey**  
(n=22)



Population trends among selected widespread big game species for the nation and Forest and Rangeland Renewable Resources Planning Act of 1974 regions from 1975 to 2008. The number of states providing population estimates is given by *n*, and regions lacking a trend line indicate that no state within that region provided population data for that particular species.

The Association of Fish & Wildlife Agencies (the umbrella organization representing North America's individual fish and wildlife agencies) recently reaffirmed, through the passing of a formal resolution, the importance of sustainable use (through hunting) and regulated trade for the success of the North American conservation efforts.

## **RESOLUTION 2019-06-10**

### **REAFFIRMING SUPPORT FOR SUSTAINABLE USE AND REGULATED TRADE**

**WHEREAS**, the sustainable use of fish and wildlife is the foundation of natural resource conservation and management in the United States and Canada as embodied by the North American Model of Wildlife Conservation; and

**WHEREAS**, jurisdictions and governments have a responsibility to manage fish and wildlife to ensure sustainable populations; and

**WHEREAS**, hunting, fishing, and trapping are regulated methods of take informed by science which engage the public in a meaningful role in fish and wildlife management and conservation; and

**WHEREAS**, regulated hunting, fishing and trapping are essential for the conservation of species including endangered and threatened species, management of populations, control of disease, resolution of human-wildlife conflicts, support of indigenous peoples' livelihoods, and protection of sensitive habitats; and

**WHEREAS**, scientifically managed sustainable use may involve individual personal use and/or the trade in fish and wildlife; and

**WHEREAS**, well managed, regulated hunting, fishing, and trapping supports and promotes biodiversity conservation, can affirm strong cultural ties, and is a heritage activity across eons; and

**WHEREAS**, international conventions and treaties promote the sustainable use and trade of fish and wildlife; and

**WHEREAS**, two of the three objectives of the Convention on Biological Diversity are to conserve biodiversity and the sustainable use of its components; and

**WHEREAS**, the Convention on International Trade in Endangered Species of Wild Fauna and Flora (CITES) exists to ensure international trade in fish, wildlife and plant species is sustainable; and

**WHEREAS**, sustainable trade in CITES-listed species can be an important and beneficial component of sustainable use of fish and wildlife and their conservation including providing funding for and economic incentives to local communities to support fish and wildlife conservation;

**NOW, THEREFORE, BE IT RESOLVED** that the Association of Fish and Wildlife Agencies reaffirms its support for the sustainable use and regulated trade of fish and wildlife.

Submitted by the International Relations Committee and the Sustainable Use of Wildlife Committee.

Adopted by the Association on September 25, 2019 in St. Paul, MN.<sup>7</sup>

## AFRICA

According to the former chair of the International Union for Conservation of Nature (“IUCN”) Sustainable Use and Livelihoods Specialist Group, Mrs. Rosie Cooney, “[t]here’s only two places on earth where wildlife at large scales has actually increased in the 20<sup>th</sup> century, and those are North America and southern Africa. Both of those models of conservation were built around hunting.”<sup>8</sup> The main difference between the two models being that the African model is primarily funded through fees and levies generated by foreign sportsmen and women.

The 2016 Great Elephant Census (“GEC”) estimated a population of 352,271 elephants across 18 African countries.<sup>9</sup> Notably, 90.5% of the elephant population is found in countries that use legal, regulated hunting as a conservation tool (*see* Table One).

<b>TABLE ONE – GREAT ELEPHANT CENSUS RESULTS<sup>10</sup></b>	
<b>Country/Region</b>	<b>GEC Elephant Count</b>
Angola	3,395
Botswana*	130,451
Northern Cameroon*	148
Chad	743
Northeast Democratic Republic of Congo	1,959
Ethiopia*	799
Kenya (includes Laikipia-Samburu, Tsavo-Amboseli, and Masai Mara)	25,959
Malawi	817
Mali	253
Mozambique*	9,605
South Africa*	17,433
Tanzania*	42,871
Uganda*	4,864
W-Arli-Pendjari Complex** (includes Niger, Burkina Faso, and Benin)	8,911
Zambia*	21,758
Zimbabwe*	82,304

<sup>7</sup> Association of Fish & Wildlife Agencies, *Resolution 2019-06-10: Reaffirming Support for Sustainable Use and Regulated Trade*, unpaginated.

<sup>8</sup> Cooney, R., *Outcry for Cecil the Lion Could Undercut Conservation Efforts*, unpaginated.

<sup>9</sup> The Great Elephant Census, *Census Results Summary*, unpaginated.

<sup>10</sup> The Great Elephant Census, *Country-by-Country Findings*, unpaginated (“GEC 2016”).

\*indicates countries that hunt.  
\*\*Benin and Burkina Faso hunt.

Across four Southern African countries (Botswana, Namibia, South Africa, and Zimbabwe)—all of which use hunting as a conservation tool—sub-population sampling evidenced that there was an 8% increase in their lion populations relative to large scale lion population decreases across the rest of Africa.<sup>11</sup> Tanzania, another country utilizing hunting, is estimated to hold half of Africa’s wild lion population.<sup>12</sup>

Both of these iconic species are impacted by threats associated with vastly expanding human populations across the African continent. As it relates to elephant, ivory and meat poaching are chief threats with population fragmentation, swift land conversion, and human-elephant conflict following suit.<sup>13</sup> Lion are very sensitive to the impacts of growing human populations and face the primary threats of retaliatory killings (preemptory and retaliatory killings for human and livestock loss) and prey base depletion.<sup>14</sup>

“Focusing on trophy hunting” according to Dr. Amy Dickman, “distracts attention from the major threats to wildlife.”<sup>15</sup> Maintaining large landscapes for wildlife, in light of expanding human populations,<sup>16</sup> and the concomitant conservation threats associated with human expansion are the true threats to wildlife and habitat. The conservation consequences of human population growth on lion, elephant, and other species conservation must **not** be overlooked,

“The impact of this human population growth on the lion estate depends on many variables, but even supposing favourable economic development and land-use transitions were to occur (which seems unlikely in many places), it is expected that pressure on lion habitat and prey will increase substantially. Livestock numbers are expected to grow concomitantly, leading to intensified human lion conflict. Changes in human populations may also be associated with changes in patterns of tourism, which might affect both photographic and hunting revenues for lion range states.”<sup>17</sup>

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<sup>11</sup> Bauer, H., Packer, C., Funston, P.F., Henschel, P. & Nowell, K. 2016. *Panthera leo*. *The IUCN Red List of Threatened Species 2016*, p. 8 (“IUCN 2016(b)”).

<sup>12</sup> Macdonald, D., *Report on Lion Conservation with Particular Respect to the Issue of Trophy Hunting*, p. 27 (“Macdonald 2016”).

<sup>13</sup> Blanc, J. 2008. *Loxodonta africana*. *The IUCN Red List of Threatened Species 2008*, p. 6. (“Poaching for ivory and meat has traditionally been the major cause of the species’ decline. Although illegal hunting remains a significant factor in some areas, particularly in Central Africa, currently the most important perceived threat is the loss and fragmentation of habitat caused by ongoing human population expansion and rapid land conversion. A specific manifestation of this trend is the reported increase in human-elephant conflict, which further aggravates the threat to elephant populations.”)

<sup>14</sup> IUCN 2016(b), p. 11.

<sup>15</sup> Dickman, A., et al., *Trophy hunting bans imperil biodiversity*, p. 874.

<sup>16</sup> United States Fish & Wildlife Service, *Endangered and Threatened Wildlife and Plants: Listing Two Lion Subspecies*, p. 80008 (“FWS 2015”). (“Projections of future growth in human populations, areas converted to agriculture, and livestock numbers suggest suitable lion habitat will continue to decrease across its range into the foreseeable future. Between 2015 and 2050, half of the world’s population growth is expected to occur in 9 countries, 6 of which are within the lion’s range (India, Nigeria, Democratic Republic of the Congo (DRC), Ethiopia, Tanzania, and Uganda (UN 2015, p. 4). Africa has the fastest population growth rate in the world (UN 2015, pp. 3, 9; UNEP 2012a, p. 2), and future population growth in sub-Saharan Africa is projected to be large and rapid (UN 2013, p. 9).”)

<sup>17</sup> Macdonald 2016, p. 4.

“The primary causes of population declines of the large mammals subject to trophy hunting, such as the African Elephant, African Buffalo, White Rhino, Black Rhino, African Wild Dog and Hartmann’s Mountain Zebra are habitat loss and degradation, competition with livestock, illegal or uncontrolled poaching for meat and trade in animal products (ivory, horn, etc.), and retribution killing for human-wildlife conflict.”<sup>18</sup>

It is vital to understand the true scope of the amount of habitat secured and set-aside as conservation areas for legal, regulated hunting in Africa,

“Ten years ago, it was estimated that across the 11 main big game hunting countries (South Africa, Namibia, Tanzania, Botswana, Zimbabwe, Zambia, Cameroon, Central African Republic, Ethiopia, Burkina Faso, Benin), the surface area occupied by hunting concessions was 110 million hectares, almost 15% of the total land area of these countries, and in several cases greater than the area of protected areas.”<sup>19</sup>

To put that in perspective, that 110 million hectares is almost five times the size of the UK. It represents critical habitat providing large, expansive, interconnected landscapes for wildlife, thus mitigating the threat on wildlife habitat and population fragmentation. An analysis of the geographic distribution of hunting areas relative to National Parks demonstrates the clear role hunting areas serve as buffer areas to some of Africa’s most pristine wildlife sanctuaries (*see* Annex). However, with every import ban or overregulation, this amount of habitat is decreased.<sup>20</sup>

The primary threats to these iconic species—and other species—are well understood and established. Amongst rhino, elephant, leopard, and lion, legal, regulated hunting is not a threat to their survival, rather one of their saving graces in their remaining strongholds. The positive impacts of hunting are also known but seemingly fall on deaf ears. Moreover, the negative impacts of undermining the financial viability of legal, regulated hunting through hunting and import bans and overregulation on their trade are similarly understood but overlooked. Case studies on four African countries—Botswana, Namibia, Zimbabwe, and Tanzania—are detailed below, evidencing the immense impact hunting plays in each country’s respective conservation program and how similar regulations as to what DEFRA is considering can and are having tremendous negative conservation consequences.

## **Botswana**

News of His Excellency President Masisi’s decision to lift the 2014 hunting moratorium in May of 2019 was met with international outrage by special interest animal rights’ activist organizations and the Western public. However, the sovereign decision to lift the moratorium should have been applauded, as it was founded in a consultative process of impacted stakeholders.<sup>21</sup> The primary

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<sup>18</sup> IUCN 2016(a), p. 7.

<sup>19</sup> Stolton, S. and Dudley, N., *The New Lion Economy. Unlocking the value of lions and their landscapes*, p. 30.

<sup>20</sup> Macdonald 2016, p. 51-52. (“A central dilemma is that imposing total import bans on lion trophies would, in the absence of alternative incentives to conserve lions, risk perverse consequences that may worsen the conservation of lions (as well as everything covered under their conservation umbrella). Principally, this might occur by reducing the economic incentives for wildlife-based land uses, which increases the likelihood of land conversion out of the lion estate and exacerbates the main threats to lions (namely the degradation of habitat, poaching of prey and conflict with people; IUCN 2006a, b).”)

<sup>21</sup> Mongae, F., *Press Release: Lifting of the Hunting Suspension and Creation of a Citizen Empowerment Model for Tourism in Botswana*, unpaginated (“Monggae 2019”). (“1. In June 2018, a Presidential Sub-Committee of Cabinet

issues emerging from the consultative process leading to the lifting of the moratorium were significant instances of human-elephant conflict and its effect on community livelihoods, predator lion predation on livestock, and the benefits deprived by indigenous communities that would be derived through legal, regulated hunting.<sup>22</sup> The matter of lifting the hunting ban and the impact that the lack of hunting has had on communities livelihoods is so at the forefront in Botswana, that it was specifically addressed in His Excellency President Masisi's State of the Nation Address.<sup>23</sup> Moreover, it has been established that the justifications to implement the 2014 hunting moratorium were misguided, not grounded in science, and not publicly approved.<sup>24</sup>

Prior to the moratorium, revenue from legal, regulated hunting was found to be retained within Botswana significantly more than photographic revenue; therefore, representing an important

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was tasked to initiate a social dialogue aimed at reviewing the ban on hunting. The process entailed a nationwide process including holding Kgotla meetings, consultation with Local Authorities as well as other stakeholders. 2. The fundamental issue that emerged was the appreciation by citizens that they were being consulted. This was seen as necessary for building on the national principles of: Democracy, Development, Self-reliance, Unity and Botho.”)

<sup>22</sup> Monggae 2019, unpaginated. (“3. Some of the findings of the Cabinet Sub Committee on the Hunting Ban and Social Dialogues were as follows: i) The number and high levels of human-elephant conflict and the consequent impact on livelihoods was increasing; ii) Predators appear to have increased and were causing a lot of damage as they kill livestock in large numbers; iii) There is a negative impact of the hunting suspension on livelihoods, particularly for community based organizations that were previously benefitting from consumptive utilization; iv) The lack of capacity within the Department of Wildlife and Natural Parks leads to long response time to problem animals control reports; and v) The general consensus from those consulted was that the hunting ban should be lifted.”)

<sup>23</sup> Masisi, M., *State of the Nation Address by His Excellency Dr. Mokweetsi E. K. Masisi President of Botswana to the First Meeting of the First Session of the 12<sup>th</sup> Parliament*, p. 47-48. (“A major lesson learnt from the 2014 hunting moratorium is the unintended alienation of communities who felt that they were not benefitting from the natural resources around them. The lifting of the moratorium will mitigate the negative impacts of the moratorium in communities which include perceived alteration of communities from deriving benefits from natural resources around them, collapse of civil society organisations due to reduced incomes and reduced employment opportunities and income-generation activities. It is expected that hunting will contribute significantly to reducing the human/wildlife conflict by creating viable and balanced populations.”)

<sup>24</sup> Mbaiwa, J., *Effects of the safari hunting tourism ban on rural livelihoods and wildlife conservation in Northern Botswana*, p. 46-47, 54 (“Mbaiwa 2018”). (“Public meetings and workshops were conducted in Northern Botswana informing the public about the ban were carried out in key centres such as Maun, Kasane, Gumare and Shakawe and in affected CBNRM small villages. Participants in these workshops included communities that live in wildlife areas, academics, conservationists, scientist, the hunters association in Botswana known as Botswana Wildlife Management Association (BWMA), Non-Governmental Organizations like the Kalahari Conservation Society and Ngamiland Council of Non-Governmental Organizations. Ironically, participants in public meetings and workshops opposed the hunting ban. For example, academics criticized findings by Elephant Without Borders which informed the ban having methodological flaws. Academics also argued that the study was a snapshot and should not be relied on to inform decisions on the hunting ban. Instead, knowledge on long-term wildlife trends or time series data on wildlife populations in Botswana were required before a decision on the ban is made... There is no scientific study that has so far proved that safari hunting in Botswana was carried out in unsustainable basis to warrant a ban in 2014. Conversely, there is evidence that safari hunting in Botswana was regulated particularly through the quota system to promote sustainability... That is hunting in Botswana was done in marginal areas which are not profitable for photographic tourism due to low wildlife populations in these areas. Safari hunting industry in Botswana was also well monitored through its association known as Wildlife Management Association Botswana and communities monitored their through the Management Oriented Monitoring System programme. These approaches are inherently self-regulating rendering the modest wildlife off-take in these marginal wildlife areas marketable for high trophy quality and sustainable hunting tourism zones. Studies (e.g. Baldus & Cauldwell, 2004; Child, 2000; Child, 2005; Lewis & Alpert, 1997; Weaver & Skyer, 2003) have shown that where sustainable safari hunting is carried out as the main land-use activity in areas occupied by rural communities, revenues that accrue from safari hunting have resulted in improved attitudes towards wildlife among local communities, increased involvement of communities in CBNRM programmes, requests to have land included in wildlife management projects, and in some cases increasing wildlife populations. The hunting ban in Botswana has resulted in revenue loss to the country and to local communities.”)



economic contributor within the country. For example, 49.5% of hunting revenue was used in local districts, 25.7% at the national level, and 24.8% being paid overseas primarily as agent commissions.<sup>25</sup> On the other hand, it was calculated that only 27% of photographic revenue was retained in Botswana, and the remainder was sent abroad.<sup>26</sup>

Legal, regulated hunting played an irreplaceable role in Botswana's community-based natural resource management ("CBNRM") program. "Safari hunting by communities," according to Mbaiwa, "generates almost two-thirds of the tourism revenue compared with photographic tourism, which generates only a third of community revenue."<sup>27</sup> The impact of the hunting ban was felt rapidly by communities as a result of a decline in income and employment with an estimated P40 million lost annually and 600 lost jobs.<sup>28</sup> Hunting provided communities "better housing, water reticulation, income to households, better diets, infrastructure development such as lodge and vehicles for transportation" and support programs aimed at homes for the needy, funeral insurance and expense coverage, household dividends, and scholarships.<sup>29</sup> These benefits quickly came to an end once legal, regulated hunting was banned in 2014.<sup>30</sup> The hunting ban also deprived communities of game meat that represented a vital part of their diet. Hunting area agreements between the CBNRM communities stipulated the hunting operators were required to provide all the game meat from hunted animals.<sup>31</sup> A hunting quota of 22 elephant per season per hunting area resulted in ~154 tons of critical protein to the hunting area's community.<sup>32</sup>

The hunting ban manifested other negative conservation and community outcomes such as an increase in poaching instances.<sup>33</sup>

"Certainly," as recalled by Mike Chase during the hunting moratorium, "we flew over one of Africa's worst poaching hotspots today... These elephants were killed in a famous Wilderness area, managed by one of the world's largest eco-tourism travel companies The Botswana Government can't be expected to stop this poaching alone, it is incumbent upon all tourism companies – who have a responsibility to conserve these areas – to start putting their money where their mouth is and invest into protecting what they profit from,

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<sup>25</sup> Mbaiwa 2018, p. 47-48

<sup>26</sup> Mbaiwa 2018, p. 48.

<sup>27</sup> Mbaiwa 2018, p. 47.

<sup>28</sup> Mbaiwa, p. 48. ("The CBNRM Forum reported that in the Okavango Delta, a total of P7 million and 200 jobs were lost due to the hunting ban. The CBNRM Forum also reported that Mababe Village had its tourism income drop from P3.5 million to P500 000, in addition 30 jobs were lost; Sankoyo Village has its income dropped from P3.5 million to P1.8 million, experiencing 35 job losses; Okavango Kopano Mokoro Community Trust's income fell from P4.8 million to P2.5 million and about 40 people lost their jobs. Other projects in the Okavango Delta and Mgakgadikgadi Pans such as Seronga, Gudigwa, Phuduhudu and Xaixai projects experienced job losses totalling about 80 jobs...In the Chobe District, informal interviews with the Chobe Enclave Community Trust (CECT) indicate that the Trust has its annual income dropping from P6.5 million to P3.5 million in 2014 and 15 jobs were lost and this included game trekkers, escort guides and skimmers. The other community Trust in the Chobe District known as KALEPA closed down as it wholly relied on safari hunting as compared to other Trusts which had an aspect of photographic tourism.")

<sup>29</sup> Mbaiwa 2018, p. 48.

<sup>30</sup> Mbaiwa 2018, p. 48. ("The hunting ban in Botswana is felt by communities involved in CBNRM in less than 12 months.")

<sup>31</sup> Mbaiwa 2018, p. 50.

<sup>32</sup> Mbaiwa 2018, p. 50.

<sup>33</sup> Mbaiwa 2018, p. 50-51.

Botswana's natural heritage! For a moment, stop building more lodges in a World Heritage site and start doing something to help stop this madness."<sup>34</sup>

Moreover, the hunting ban led to communities experiencing negative attitudes towards wildlife conservation from the lack of benefits previously provided by hunting and increased human-wildlife conflict.<sup>35</sup> The hunting ban led to many former financially productive hunting areas to become vacant photographic areas.<sup>36</sup> Marginal areas outside of scenic landscapes traditionally used as hunting areas are "intrinsically unsuited to 'high cost' photographic tourism and the only conservation option which will provide protection and an economic return is safari hunting."<sup>37</sup>

Legal, regulated hunting clearly provided significant conservation and community livelihood benefits prior to the moratorium. With the lifting of the misguided moratorium, it is essential that their hunting industry be supported rather than undermined by a trophy import ban or restrictions from the UK.

## Namibia

Namibia is highly regarded in the conservation community for their success in managing and protecting wildlife. Namibia's success is largely directed by a conservation focused Ministry of Environment and Tourism and driven through their community conservancies supported by a well-regulated hunting program.

Currently, there are 83 registered communal conservancies supporting an estimated 212,092 community members.<sup>38</sup> The overwhelming majority—56 out of 83—community conservancies deploy hunting as a conservation tool.<sup>39</sup> "[H]unting," according to the IUCN, "has underpinned Namibia's success in community-based natural resource management"<sup>40</sup> and represents a critical tool in Namibia's conservation arsenal.<sup>41</sup> The 83 conservancies secure and protect 166,267km<sup>2</sup> of habitat representing 19.8% of Namibia's landmass.<sup>42</sup> From 1990–2017, the communal conservancy program contributed N\$7.11 billion to Namibia's net national income.<sup>43</sup> In 2017

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<sup>34</sup> Chase, M., "Ivory Tower" *Botswana Elephant Poaching Report*, unpaginated.

<sup>35</sup> Mbaiwa 2018, p. 51-52. ("He points out that the 60-year-old Jimmy Baitsholedi Ntema remarked:[']before, when there was hunting, we wanted to protect those animals because we knew we earned something out of them. Now we don't benefit at all from the animals. The elephants and buffaloes leave after destroying our ploughing fields during the day. Then, at night, the lions come into our kraals[']. Onishi (2015) also reports that Mr. Israel Khura Nato, the Head of the Botswana DWNP's Problem Animal Control Unit in Maun reported, 'We're experiencing an exponential increase in conflicts between animals and human beings.' Mr. Nato noted that such conflicts recorded nationwide rose to 6,770 in 2014 from 4,361 in 2012.

<sup>36</sup> Mbaiwa 2018, p. 53.

<sup>37</sup> Mbaiwa 2018, p. 53.

<sup>38</sup> Namibian Association of CBNRM Support Organizations, *The state of community conservation in Namibia: Annual report 2017*, p. 13 ("NACSO 2017").

<sup>39</sup> NACSO 2017, p. 37.

<sup>40</sup> IUCN 2016(a), p. 16.

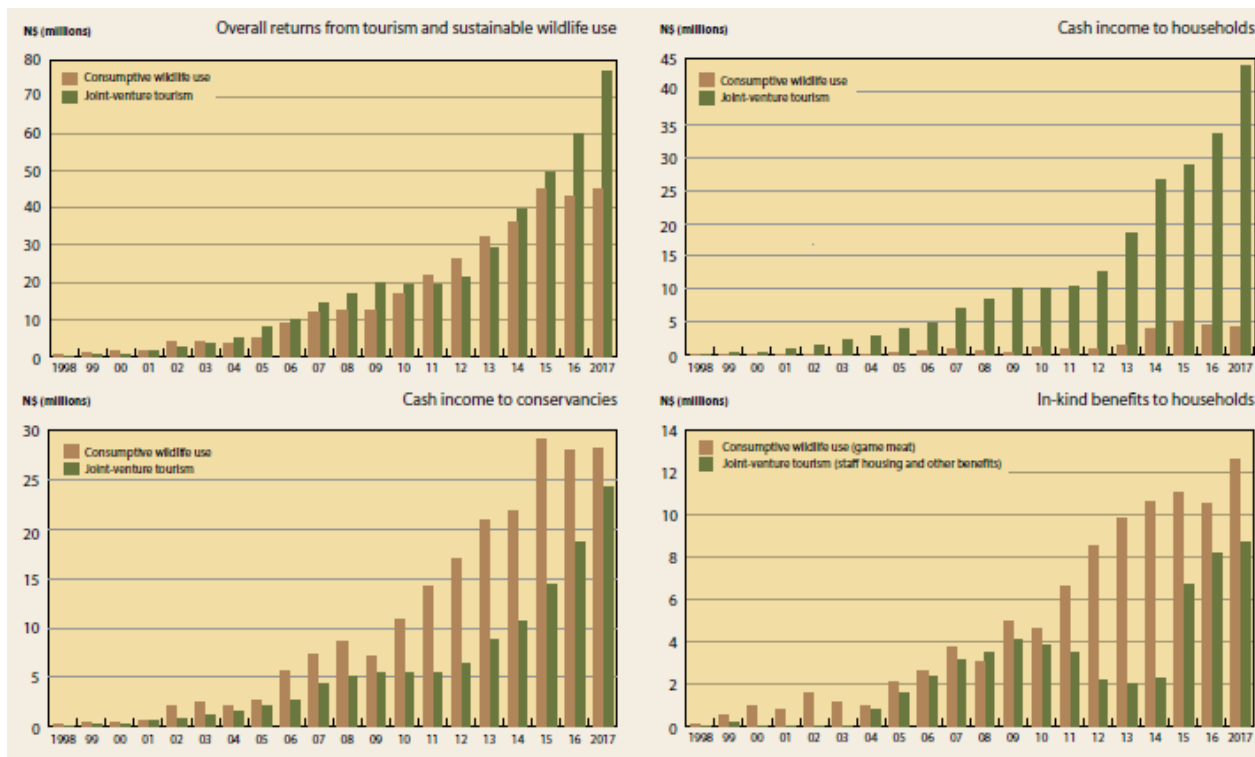
<sup>41</sup> NACSO 2017, p. 76 ("Conservation hunting, which targets only free-roaming species in natural habitats, is very important to Namibian conservation. Hunting is often criticized as having negative impacts on wildlife. However, conservation hunting utilizes such an insignificant percentage of wildlife that it has no impact on overall populations. It is important to note that most conservancies (including three of the first four that were registered) would not have been viable without wildlife use through hunting. Cash income from conservation hunting continues to provide critical finance to cover the costs of conservation activities, including anti-poaching patrols.")

<sup>42</sup> NACSO 2017, p. 13.

<sup>43</sup> NACSO 2017, p. 13.

alone, communal conservancies generated over N\$132 million in returns to local communities and provided 5,350 jobs.<sup>44</sup> Both hunting and photographic tourism are utilized by communal conservancies to reach the best livelihood and conservation outcomes and are not mutually exclusive—they complement each other (*see* Figure Two).

Figure Two – The Complementary Roles of Sustainable Consumptive Wildlife Use and Joint-Venture Tourism<sup>45</sup>



While overall returns from the two sectors are similar, consumptive wildlife enterprises (specifically conservation hunting) generates much higher fees to conservancies, which can be used to cover operational costs and development projects. On the other hand, tourism provides significantly higher cash income to households in the form of wages. In respect to in-kind benefits to households, conservation hunting remains the main contributor in the form of game meat.

The success of Namibia’s hunting-driven conservation program is clear, and the numbers speak for themselves. Communal conservancies in Northeastern Namibia have enjoyed an increase in sable (724 to 1,474) and impala (439 to 9,374) populations; in Northwestern Namibia the formerly threatened Hartmann’s mountain zebra population increased from under 1,000 to 27,000.<sup>46</sup> Despite a limited offtake, Namibia’s black rhino population has more than tripled and represents Africa’s largest free-roaming black rhino population.<sup>47</sup> Furthermore, expansive networks of wildlife landscapes provided by the conservancies supported an elephant population increase from 7,500 in 1995 to more than 20,000 presently.<sup>48</sup> Namibia has the largest free-roaming lion population in

<sup>44</sup> NACSO 2017, p. 13.

<sup>45</sup> NACSO 2017, p. 72.

<sup>46</sup> IUCN 2016(a), p. 16.

<sup>47</sup> IUCN 2016(a), p. 16.

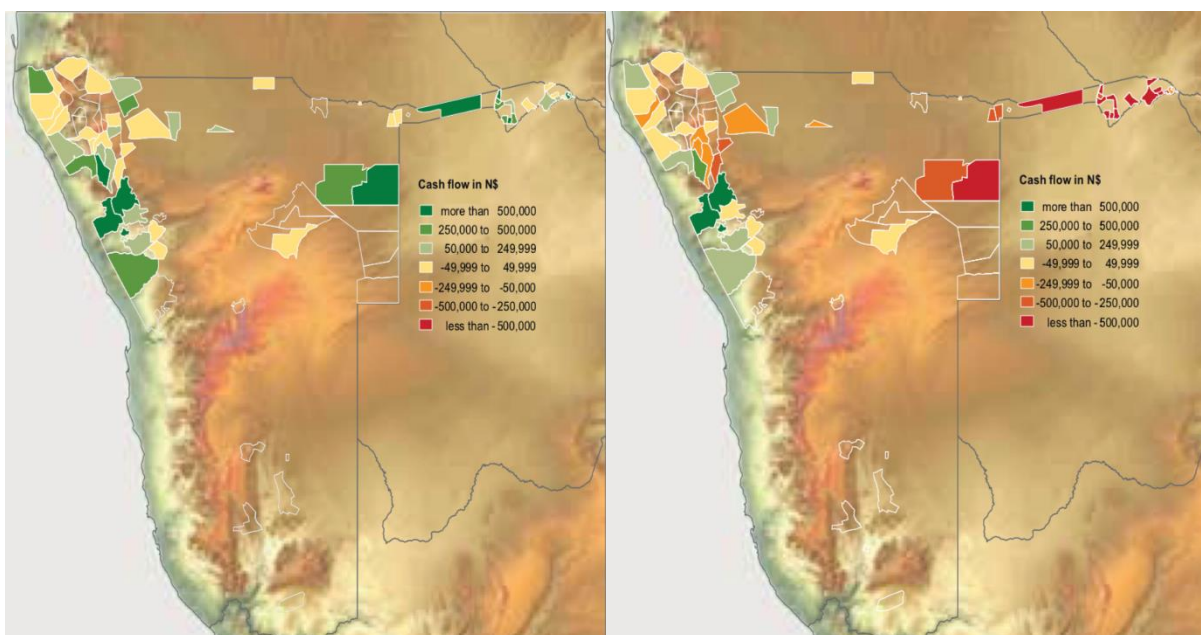
<sup>48</sup> IUCN 2016(a), p. 16

Africa outside of National Parks as a result of high community tolerance for lion due to benefits derived by communities.<sup>49</sup>

Significant revenue is generated to the government and communities through Namibia's legal, regulated hunting program. In 2013, the hunting of 29 species on conservancies generated \$1,671,379 in trophy fees with elephant, hippo, Hartman's mountain zebra, lion and leopard representing 63% of that total.<sup>50</sup> Every elephant hunted directly provides not only ~3,000kg in critical protein but also \$20,000 in revenue to communities.<sup>51</sup>

If hunting was banned or the financial viability of hunting areas were undermined as a result of import bans, it is established that most communal conservancies would become unviable and therefore lead to negative livelihood and conservation outcomes (*see* Figure Three).

Figure Three – Importance of Consumptive Wildlife Use Income for Community Conservancies<sup>52</sup>



The maps illustrate the importance of income generated through sustainable consumptive wildlife use for selected conservancies (left). The loss of this income would result in a negative cash flow for most of these conservancies, which would no longer be able to cover their running costs (right).

In 2016, Namibia took a bold stand by announcing a ban on hunting bans given the tremendous impact legal, regulated hunting has on livelihoods and wildlife conservation.<sup>53</sup> Moreover, Mr. N. Pohamba Shifeta, Namibia's Minister of Environment and Tourism, recently stated the following:

“Our policy of devolving conditional wildlife ownership rights to our people has produced excellent results for wildlife conservation and rural sustainable

<sup>49</sup> IUCN 2016(a), p. 16

<sup>50</sup> IUCN 2016(a) p. 16

<sup>51</sup> IUCN 2016(a), p. 16

<sup>52</sup> NACSO 2017, p. 73; IUCN 2016(a), p. 16.

<sup>53</sup> All Africa, *Namibia: Cabinet Decisions - International Pressure to Ban Hunting and the Import of Wildlife Products*, unpaginated.

development...The economic competitiveness of wildlife-based land use has driven Namibia's 're-wilding' success, with huge gains for wildlife, biodiversity conservation, job creation and the national economy...Without hunting, large parts of our land would be less productive. Hunting lessens the gravity of the ecological and socio-economic impacts of climate change. To lose hunting would have a significant impact on conservation and would detract from the competitiveness of wildlife as a preferred land-use...**Any ban on the import of hunting trophies threatens to erode all the progress made in our country since independence.**"<sup>54</sup> (emphasis added)

## Zimbabwe

Zimbabwe is a champion of wildlife conservation, despite suffering a bush war and decades of civil unrest. Zimbabwe is home to Africa's second largest elephant population and a growing lion population.<sup>55</sup>

Two leading examples of conservation through hunting in Zimbabwe are the Save Valley Conservancy ("SVC") and the Bulyepi Valley Conservancy ("BVC"). Both of these conservancies were former cattle ranches whose owners believed that wildlife could be a better land use than livestock—they were correct.<sup>56</sup> In SVC—344,000 hectares—livestock operations entirely eradicated all elephant, lion, rhino, and buffalo from the various ranches making up what is now SVC.<sup>57</sup> However, since its inception in the 1990s, SVC is home to 1,500 elephant, 121 black rhino, 42 white rhino, 280 lion, and various packs of African wild dogs as of 2016.<sup>58</sup> The BVC—323,000 hectares—holds over 500 lion, 700 elephant, 5,000 buffalo, 82 white rhino, and 211 black rhino—the third largest black rhino population in Africa.<sup>59</sup> Species such as black and white rhino and African wild dog are not hunted in SVC or BVC; however, all these species significantly benefit from the hunting-driven conservation programs in both of the conservancies.<sup>60</sup> Both conservancies also provide significant support to local communities with the Sango Ranch in SVC alone supporting the livelihoods of over 1,000 individuals and the BVC supporting over \$200,000 in community development projects annually.<sup>61</sup> Both of these conservancies rely on hunting for revenue generation and would be financially unviable without hunting.<sup>62</sup>

The Dande Anti-Poaching Unit ("DAPU"), funded and operated by Charlton McCallum Safaris, is another example of the irreplaceable efforts and positive impact legal, regulated hunting has in Zimbabwe. DAPU conducts anti-poaching operations in the Dande Safari Area in Zimbabwe's Mbire District.<sup>63</sup> Most of their hunting areas falls in communal land overseen by Zimbabwe's CBNRM program called CAMPFIRE. Charlton McCallum Safaris has entered into a joint venture with the CAMPFIRE program in hunting area and from 2013-2015 alone provided \$2,059,566 in revenue to National Parks and the CAMPFIRE program.<sup>64</sup> DAPU's anti-poaching efforts are

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<sup>54</sup> Smit, Ellaine, *Unethical hunting has no place in Namibia*, unpaginated.

<sup>55</sup> GEC 2016, unpaginated; Macdonald 2016, p. 30.

<sup>56</sup> IUCN 2016(a), p. 15.

<sup>57</sup> IUCN 2016(a), p. 15.

<sup>58</sup> IUCN 2016(a), p. 15.

<sup>59</sup> IUCN 2016(a), p. 15.

<sup>60</sup> IUCN 2016(a), p. 15.

<sup>61</sup> IUCN 2016(a), p. 15.

<sup>62</sup> IUCN 2016(a), p. 15.

<sup>63</sup> Dande Anti-Poaching Unit, website, <http://dapuzim.com/about.html>.

<sup>64</sup> Dande Anti-Poaching Unit, *Presentation*, <http://dapuzim.com/DAPU-2015.pdf>.

immense. In 2010, when DAPU was started, they experienced 40 elephant carcasses relative to four in 2018.<sup>65</sup> Similarly, DAPU collected 1,141 snares in 2010 and only 125 in 2018.<sup>66</sup> These contributions to government authorities and community and anti-poaching results would not be possible but for legal, regulated hunting.<sup>67</sup>

In July of 2019, the Subcommittee on Water, Oceans, and Wildlife in the U.S. House of Representatives held a hearing on proposed Bill H.R. 2245 on Conserving Ecosystems by Ceasing the Importation of Large Animal Trophies or CECIL Act. The CECIL Act—among other things—seeks to ban the importation of iconic species such as lion and elephant into the US from Tanzania, Zambia, and Zimbabwe. Dr. Patience Gandiwa, Executive Technical Advisor for the Zimbabwe Parks and Wildlife Management Authority, attended the hearing and was given the opportunity to testify. Her sentiments regarding the proposed CECIL Act are clearly diametrically opposed to any such legislation and DEFRA should take them into consideration,

“The Government of Zimbabwe is deeply concerned about this Bill which has misleading ideas from those who are presumably doing conservation in theory, not in practice. Zimbabwe is therefore here to advocate for the truth of what we know works for the long-term survival of elephants and lions in-situ...the proposed Bill will jeopardise the implementation of our sound management practices that have sustained a viable, healthy and growing elephant population...The proposed Bill H.R 2245 is not crafted in the spirit of advancing conservation efforts at grassroots level and is not in sync with sound conservation policies of the range states of the species concerned. It is introducing fortress conservation principles/preservation of wildlife resources which are a recipe for ecological disaster as they remove the economic value of wildlife from local people and governments working to protect (in a sustainable way) the wildlife and habitats of species concerned...Regulated sport hunting is an integral part of securing the viability of key habitats of our growing (and stable) populations of large carnivores such the lion straddling beyond protected area boundaries...Trophy hunting is a significant incentive to secure over 5 million hectares of land outside Zimbabwe’s protected area network and the proposed Bill will render such expansive wildlife habitat more susceptible to alternative land use such as crop agriculture...Progressive countries like the United States are expected to play a leading role in promoting activities that benefit conservation and humanity rather than enacting laws that will prejudice other sovereign countries like Zimbabwe of our benefits from good conservation practices. Trophy hunting is part of our culture and over hundreds of years, we have refined this practice in an adaptive way to make it sustainable in the face of demographic issues and other threats.”<sup>68</sup>

## Tanzania

Tanzania, holding approximately 50% of Africa’s wild lion population, has set aside almost a third of its land mass for wildlife conservation.<sup>69</sup> Game Reserves that allow hunting represent 26.4% of

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<sup>65</sup> Dande Anti-Poaching Unit, *DAPU First Period Newsletter 2019*, unpaginated (“DAPU 2019”).

<sup>66</sup> DAPU 2019, unpaginated.

<sup>67</sup> DSC Foundation, *The Guardians*, <https://youtu.be/XfVildJ5bes>.

<sup>68</sup> Gandiwa, P., *Statement Presented by the Republic of Zimbabwe on the Proposed Bill H.R. 2245 on Conserving Ecosystems by Ceasing the Importation of Large Animal Trophies or Cecil Act*, p. 1, 2,3, and 6.

<sup>69</sup> Macdonald 2016, p. 27.

the country's landmass with Game Controlled Areas, Wildlife Management, and Open areas adding to that figure.<sup>70</sup>

In December of 2015, the United States Fish & Wildlife Service (“FWS”) listed lion from Southern and Eastern Africa as “threatened” under the Endangered Species Act.<sup>71</sup> The relevant special 4(d) rule associated with the listing requires FWS to make a finding that the hunting program enhances the survival of the species in the wild in order to import a lion into the US.<sup>72</sup> Meaning experts in the FWS make a science-based determination that issuing an import permit not only is non-detrimental to their survival but in fact enhances their survival. Therefore, any actions aimed at destabilizing legal, regulated hunting of lion are in direct conflict with any intent to safeguard the species.

The issuance of a lion import permit into the US in September 2019 made media headlines and caused outrage.<sup>73</sup> The true threats to lion have been identified and are steadfast amongst FWS, IUCN, and leading experts on lion conservation: habitat loss, human-wildlife conflict, and prey base depletion. An audit of 27 Tanzanian hunting operators from 2013–2015 alone revealed their own contributions of over \$6.7 million towards anti-poaching and \$3.1 million in community development.<sup>74</sup> Among other successes, this led to the seizure of 6,233 snares and gin traps, 1,557 rounds of ammunition, 171 firearms and the arrest of 1,409 poachers.<sup>75</sup> This represents a snapshot of the Tanzanian hunting industry let alone the efforts of hunting operators across the African continent. This information was used by FWS in making their well-reasoned and well-supported decision to issue a lion import permit.

Mr. Eric Pasanisi owned Tanzania's oldest, and one of the largest hunting companies, with 11 hunting concessions under his stewardship.<sup>76</sup> In 2018, Mr. Pasanisi was forced to surrender all 11 areas, “[w]e cannot book enough 21-day safaris to make a profit or stay in business without lion and elephant trophy imports into the US. Our losses are escalating so we have to stop.”<sup>77</sup> Apart from the obvious negative conservation consequences of vacant large expanses of habitat, the surrendering of Mr. Pasanisi's hunting areas caused significant declines in revenue to Tanzanian government management authorities.<sup>78</sup> Despite the restrictions on importation and limited income, Mr. Pasanisi still spent \$2.4 million on anti-poaching in the three years prior to surrendering his areas.<sup>79</sup> “We funded” according to Pasanisi “100 game scouts in the Selous Game Reserve for many years, including a plane, vehicles, food and fuel.”<sup>80</sup>

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<sup>70</sup> Macdonald 2016, p. 27.

<sup>71</sup> FWS 2015, generally.

<sup>72</sup> FWS 2015, generally.

<sup>73</sup> Fobar, R., *Lion trophy approved for import into U.S., stirring controversy. Here's why that matters*, unpaginated.

<sup>74</sup> Boguslawski, M., *Tanzania Lion Enhancement Summary Report*, p. 4, 6 (“Boguslawski 2016”).

<sup>75</sup> Boguslawski 2016, p. 3.

<sup>76</sup> The Guardian, *Concerns over wildlife conservation as top firm surrenders*, unpaginated (“Guardian 2018”).

<sup>77</sup> Guardian 2018, unpaginated.

<sup>78</sup> Guardian 2018, unpaginated. (“He said in spite of emerging difficulties in the tourist hunting industry, his company still paid from 2012 to 2015 in excess of \$3 million (around 6.7 billion shillings) in taxes to the government...During the same period we also paid more than \$5m in game fees and hunting permits. So we, as a company, have been very important contributors to Tanzania's economic expansion as well as in anti-poaching[.]”)

<sup>79</sup> Guardian 2018, unpaginated.

<sup>80</sup> Guardian 2018, unpaginated.

**CONVENTION ON INTERNATIONAL TRADE IN ENDANGERED SPECIES OF WILD FAUNA  
AND FLORA; FREE, PRIOR INFORMED CONSENT**

The UK is a signatory to the Convention on International Trade in Endangered Species of Wild Fauna and Flora (“CITES”). As a result, the UK has already adopted means and measures to ensure any trade in wildlife—including hunting trophies—is regulated and non-detrimental to the survival of the species at hand.

Furthermore, there are several CITES provisions and resolutions that DSC believes are important to remind DEFRA of. The **preamble** to CITES specifically recognizes “that peoples and States are and should be the best protectors of their own wild fauna and flora[.]”<sup>81</sup> Under Article XIV of the Convention, parties are permitted to enact stricter domestic measures; however, Res. Conf. 6.7 recommends,

“each Party intending to take stricter domestic measures pursuant to Article XIV, paragraph 1, of the Convention regarding trade in specimens of non-indigenous species included in the Appendices make every reasonable effort to notify the range States of the species concerned at as early a stage as possible prior to the adoption of such measures, and consult with those range States that express a wish to confer on the matter[.]”<sup>82</sup>

DSC is concerned that the range States most impacted by any additional regulations on the import of hunting trophies into the UK have not been properly consulted, rather the DEFRA call for evidence was merely posted online without actively seeking the input of potentially impacted States.

Perhaps more alarming than the manner in which the call for evidence was handled is the overwhelming likelihood that no communities who have the most to lose were consulted. A true consultation and call for evidence must not only include active participation of potentially impacted range States, but also local communities whose land use rights, natural resource rights, and human rights are under threat.

“Also of relevance is the concept of free, prior and informed consent, which is concerned principally with requirements for consultation in relation to measures that may affect

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<sup>81</sup> CITES Preamble.

<sup>82</sup> CITES Res. Conf. 6.7. *See also* Res. Conf. 17.9: Trade in hunting trophies of species listed in Appendix I or II. (“RECOGNIZING that well-managed and sustainable trophy hunting is consistent with and contributes to species conservation, as it provides both livelihood opportunities for rural communities and incentives for habitat conservation, and generates benefits which can be invested for conservation purposes...ACKNOWLEDGING that where economic value can be attached to wildlife and a controlled management system is implemented, favourable conditions can be created for investment in the conservation and the sustainable use of the resource, thus reducing the risks to wildlife from alternative forms of land use...RECALLING that Resolution Conf. 16.6 (Rev. CoP17) on *CITES and livelihoods* recognizes that poor rural communities may attach economic, social, cultural and ceremonial importance to some CITES-listed species, and RECOGNIZING the resources that trophy hunting provides to certain local communities...FURTHER RECOGNIZING that range States invest significant resources in making scientifically based non-detriment findings and establishing sustainable quotas for hunting trophies...RECOGNIZING that the conservation status of a species may differ across its range, and that this needs to be taken into account in the non-detriment findings of the respective Scientific Authorities as required under Articles III and IV of the Convention...FUTHER RECOGNIZING that trophy-hunting activities can successfully be managed for the benefit of the species in cooperation with and provide benefits to local communities, where relevant[.]”)



Indigenous and traditional peoples. The purpose of consultation is to seek mutually acceptable solutions that adequately satisfy a proposal's legitimate objective, but also limit, remove and/or compensate for encroachment on Indigenous peoples' substantive rights, such as the right to lands and natural resources.”<sup>83</sup>

Matters related to hunting trophy imports would obviously mandate the participatory consultation and consent of local communities because of the tremendous positive impact legal, regulated hunting demonstrably plays in their livelihoods.

### CONCLUSION

The DEFRA consultation and call for evidence are tragically ironic given the UK's history of imperialism in Africa. Any attempts to dictate Africa wildlife conservation policy via import restrictions or bans is a continuation of the UK's past conquests masqueraded as “conservation” policy. Any such restriction or ban would be a gross undermining of the sovereign rights of African countries to manage their affairs as they know best—unhindered by Western ideologies and arrogance. The countries utilizing hunting as a conservation tool know what they are doing, given they hold the last bastions of free-ranging wildlife in Africa. In no way should they be punished for their success because of your concept of right and wrong. A ban or increased restrictions on trophy imports to the UK are a taking, a taking that offers no replacement or reparation. As a nation of influence, your policies carry great weight. Decisions to impose stricter import requirements or a ban could influence other countries to follow suit, leaving DEFRA with the legacy of supporting the downfall of Africa's wildlife.

People are quick to judge things with which they are unfamiliar. Efforts aimed at undermining legal, regulated hunting can and are having catastrophic consequences. Wildlife and habitat conservation globally, especially in light of booming human population growth, does not happen accidentally. Conservation in Africa requires a multi-faceted approach. In closing, we implore you to contact those who actually manage and live with lion, elephant, and other wildlife—Southern African Development Community wildlife ministries and rural Africans—to ask them what they need to ensure that these great animals continue to roam wild Africa.

Respectfully,



Corey Mason, DSC Executive Director



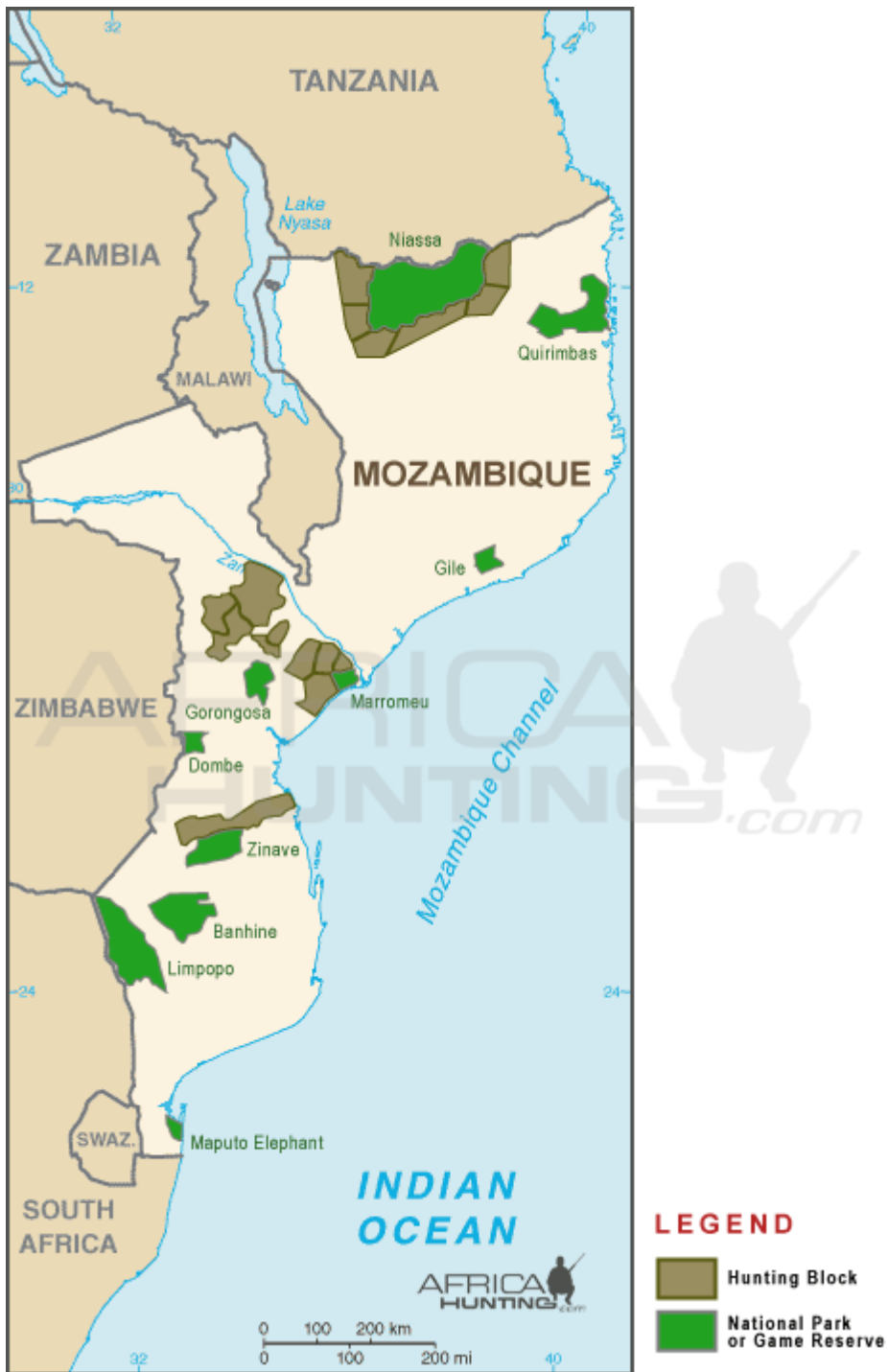
Matt Boguslawski, DSC Manager of Advocacy

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<sup>83</sup> Newing, H. and Perram, A., *What do you know about conservation and human rights?*, p. 595-596.

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ANNEX – MAPS







**LEGEND**

- Hunting Block
- National Park or Game Reserve



**LEGEND**

- Mostly Private Land for Hunting and/or Farming
- Conservancy Hunting Permitted
- Ecotourism Concession
- National Park or Game Reserve
- Communal Conservancy



**LEGEND**

- Controlled Hunting Area
- National Park or Game Reserve