

25 February 2020

Rt. Hon. George Eustrice MP
Secretary of State for Environment, Food and Rural Affairs
Seacole Building
2 Marsham Street
London, SW1P 4DF

SCI LONDON CHAPTER

Via: huntingtrophyconsultation@defra.gov.uk

Re: Consultation on controls on the import and export of hunting trophies; Call for evidence on the scale and impacts of the import and export of hunting trophies

Dear Sir:

Safari Club International's London Chapter (SCI London) appreciates the opportunity to comment on the important question of how the United Kingdom should regulate the trade of hunting trophies into and out of the UK. For reasons explained below, SCI London urges Defra to adopt Option Four and maintain existing internationally-agreed regulations related to trade in hunting trophies. In fact, Defra should actively encourage the trade in trophies.

SCI London Chapter

SCI London's missions are to develop and support ethical, sustainable hunting in its role as a necessary cornerstone for wildlife conservation worldwide, and to provide factual information to the general public regarding the roots, culture, and benefits of hunting. SCI London's members contribute to the conservation and management of wildlife species through habitat conservation initiatives, donations to research and management programs, and participation in regulated hunting. Hunting contributes to the value of sustainable use conservation.

Safari Club International's London Chapter aims to gather together a network of like-minded individuals from the hunting and deer stalking communities to further promote SCI's work in the UK and Europe of protecting the freedom to hunt, hunting heritage, and conservation of species and habitats. As Home Office figures show, more than 500,000 people in the UK have gun licences and most of them hunt. Members of the Chapter believe it is important for hunters to have a global voice and work together to educate members of society about the value of hunting as a recreational and traditional activity, and the role that hunting plays in conservation.

True Consideration Must Be Given to the Facts

SCI London is aware that Defra has already received numerous submissions, letters, studies, data, and other information regarding the value and benefits of hunting. Those submissions demonstrate that Defra could adopt Option Four and maintain existing regulations regarding trade of hunting trophies.

Defra could recognize the well-demonstrated fact that wildlife populations are faring much better in countries and areas where regulated hunting, including trophy hunting, is utilized as a conservation tool compared to countries and areas where it is not. The numbers speak for themselves and are undeniable.¹ SCI previously submitted a letter to Defra with an annex of 105 different relevant sources that provide detailed information regarding how hunting benefits conservation. Rather than restating the facts presented in the information already submitted, this letter focuses on other aspects of the issue before Defra.

Media reports and rhetoric from politicians suggest that the consultation and call for evidence are farces and that the UK Government has already determined to adopt a ban on trade in hunting trophies. SCI London sincerely hopes such reports are unfounded. It would be truly shameful if Defra simply ignores the copious information presented to it by range states, scientists, wildlife managers, and conservation organizations.

As many have stated in media publications and directly to Defra, the UK must justify its decision-making based on science and data.² Moral opposition to hunting or a misinformed, generalized belief that “trophy hunting” is unethical are irrelevant to wildlife management. These considerations should not influence Defra’s decision-making, which should be based exclusively on existing internationally-agreed policy frameworks, species biological factors, and successes exhibited by range state conservation programs. Any decision to further restrict trade in hunting trophies would not only be detrimental to conservation efforts worldwide, it would set a bad precedent for scientifically-unsupported wildlife management decision-making and discourage scientists from conducting relevant conservation research.³

¹ Species Recovery Stories – Thanks to Hunting!, 5 May 2016
<https://firstforwildlife.wordpress.com/2016/05/05/species-recovery-stories-thanks-to-hunting/>;
Giraffe Populations Show Benefits of Sustainable Use of Wildlife in Africa, 6 February 2019,
<https://firstforwildlife.wordpress.com/2019/02/06/giraffe-populations-show-benefits-of-sustainable-use-of-wildlife-in-africa/>; African Elephant Status Report 2016, IUCN,
https://portals.iucn.org/library/sites/library/files/documents/SSC-OP-060_A.pdf (compare populations in countries that have trophy hunting programs to those that do not).

² For example, a senior research fellow at the University of Oxford and a research fellow with the Property and Environment Research Center recently argued that decisionmakers “should take the time to separate facts from propaganda and listen to scientists and stakeholders to avoid prioritizing emotions over evidence.” <https://thehill.com/changing-america/opinion/481669-saving-africas-last-lions-will-rely-on-evidence-not-emotion>.

³ As one scientist suggested, if Defra’s decision lacks scientific foundation in favor of emotion, “we all lose” and it would be “a threat to science itself.” <https://www.dailymaverick.co.za/opinionista/2019-11-24-activists-shoot-down-scientists-and-we-all-lose>.

Range State Cooperation Is Imperative

Rather than dictating to other countries around the world how they should manage their wildlife resources, Defra should endeavor to work cooperatively with range states in Africa and elsewhere. There is an underlying truth that the very act of creating a law that has a direct and known impact on a selection of African nations developing economies in a negative and oppressive manner, is indirectly an act of Colonialism, which directly opposes the values of the United Kingdom.

Alternative to this strategy, a far better approach would be to engage with range states. This consultation should have started with Defra discussing the issues directly with representatives from range states and weighing those discussions most heavily when making relevant decisions, if any, to further regulate this trade. If Defra has concerns about specific hunting operations or species management in certain countries, it should engage those countries to work together to address any alleged problems.⁴ Defra could even utilize meeting opportunities with African ranges states that Safari Club International Foundation are able to provide, as the U.S. Fish and Wildlife Service and the European Union have done for years.⁵

Defra should also engage hunters directly, via roundtable or otherwise, as hunters are direct stakeholders in this decision-making. Further, hunters and sustainable use conservation organizations work cooperatively with range states and local communities and landholders to protect and manage wildlife and habitat, so they have direct knowledge of how hunting and trade in hunting trophies contributes to conservation. Without this engagement, Defra has only heard a part of the story—a part rarely based on fact or told by people with on-the-ground experience in hunting areas.

Rather than attempting to engage range states and relevant stakeholders about issues related to trade in hunting trophies, it is regrettable that Defra seems to have opened the door to wildlife management by popularity contest. SCI London believes all interested stakeholders, including those who oppose hunting, should be allowed to provide input. But opinions with no basis in fact or science should be dismissed.

Some who support a hunting trophy trade ban argue that the UK should discourage its citizens from hunting in other areas of the world, especially Africa, because such hunting is a vestige of colonialism. These misinformed anti-hunting activists even want the UK to attempt to force other nations to stop hunting programs altogether.⁶ The irony of these arguments, of course, is that the African range states that have hunting programs have voiced extensive opposition to any further restrictions on trade in hunting trophies. Linked below are a number of videos from representatives of

⁴ <https://www.washingtonexaminer.com/opinion/op-eds/cecil-act-would-destroy-local-conservation-programs>

⁵ <https://safariclubfoundation.org/zambia-minister-among-record-number-of-african-government-officials-at-sci-show/>.

⁶ <https://www.theguardian.com/environment/2020/feb/17/ranulph-fiennes-labels-trophy-hunters-bullying-bastards-and-calls-for-uk-import-ban-aoe>.

African range state wildlife authorities explaining the detrimental impact that the UK's adoption of a trophy importation ban would have on conservation efforts in their respective countries.⁷ Indeed, if the UK implements an importation ban, it would be in direct contradiction to the desires of the range states that have robust populations of hunted wildlife. Taking an action, without the prior consultation, which runs against the express desires of the affected range states seems to be an act of colonialism—not the continued participation in science-based conservation programs designed and managed by these countries.

Adopt Option Four

For the reasons explained above and in submissions from range states and other sustainable use conservation organizations, Defra should adopt Option Four and maintain existing controls on trade in hunting trophies. Adoption of a more restrictive approach is not scientifically justifiable and would contravene the wishes of on-the-ground wildlife managers and range state wildlife authorities. As many have explained, imposing additional requirements or prohibiting trade would not benefit conservation efforts. Indeed, trade restrictions can result in detrimental impacts to conservation efforts by reducing funding and incentives for conservation. Defra must follow the science and make the best decision for the conservation of wildlife and habitat.

Please contact me at president@scilondon.com for additional information or questions about this letter.

Sincerely,

Steve Jones
President, SCI London Chapter

⁷ <https://www.youtube.com/watch?v=VDF83EMhGfY> (Fulton Mangwanya, Zimbabwe);
<https://www.youtube.com/watch?v=ju02osf8OH8> (Prof. Patience Gandiwa, Zimbabwe);
<https://www.youtube.com/watch?v=Vwnl5GHEc5E> (George Pangeti, Zimbabwe);
<https://www.youtube.com/watch?v=sdNRUUFs0z8> (Geoffreys Matipano, Zimbabwe);
<https://www.youtube.com/watch?v=-mX97v2kc70> (Dr. Cyril Taolo, Botswana);
<https://www.youtube.com/watch?v=GZTY9yn2j0M> (Phemelo Gadiwang, Botswana);
<https://www.youtube.com/watch?v=Jj0YaRycNcE> (Tebogo Boalotswe, Botswana);
<https://www.youtube.com/watch?v=IdWIb6v1C-A> (Dr. James Wakibara, Tanzania);
<https://www.youtube.com/watch?v=STrWcQ1dlGg> (Imani Nkuwi, Tanzania);
<https://www.youtube.com/watch?v=EMlQrd8dOcc> (Johnson Ndokosho, Namibia, 1st);
<https://www.youtube.com/watch?v=ombDS51C5ok> (Johnson Ndokosho, Namibia, 2nd);
https://www.youtube.com/watch?v=Bp3oQd_pqaU (Frans Kamenye, Namibia);
<https://www.youtube.com/watch?v=2XqdF1agiel&t> (HRH Benjamin Dipati Maenetja, South Africa);
<https://www.youtube.com/watch?v=A49OYasCHoo> (James Lutalo, Uganda);
https://www.youtube.com/watch?v=PumwdKDt1_8 (Elfinesh Zelellew, Ethiopia)