



24 January 2020

Rt. Hon. Theresa Villiers MP
Secretary of State for Environment, Food and Rural Affairs
Rt. Hon. Zacharias Goldsmith
Minister of State
Seacole Building
2 Marsham Street
London, SW1P 4DF

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 Madam and Sir:

Safari Club International (“SCI”) and Safari Club International Foundation (“SCIF”) (collectively “Safari Club”) appreciate the opportunity to provide information and insights regarding the important question of how the United Kingdom should regulate the trade—both import and export—of hunting trophies into and out of the UK. For reasons explained below, Safari Club urges Defra to adopt “Option Four” and maintain existing internationally-agreed regulations related to trade in hunting trophies. Safari Club invites Defra to encourage the trade in trophies because regulated hunting generates crucial conservation incentives, as shown in the extensive amount of scientific literature, news articles, and online videos annexed here for Defra’s consideration.

Safari Club International and Safari Club International Foundation

SCI is a U.S.-based nonprofit corporation with approximately 50,000 members worldwide, including many who hunt wildlife species in the United Kingdom and throughout the world. SCI has domestic and international Chapters, including a London Chapter with UK-based members. SCI 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. SCI’s missions include the conservation of wildlife, protection of the hunter, and education of the public concerning hunting and its use as a conservation tool. SCI is an international leader in representing the role of hunting as a conservation tool, and routinely provides relevant information regarding hunting to state and federal government entities. SCI carries out its conservation mission in part through its sister organization, SCIF.

SCIF is a U.S.-based nonprofit corporation. Its missions are to fund and direct worldwide programs dedicated to wildlife conservation and outdoor education. In fulfilling its mission, SCIF conducts and

supports scientific and technical studies in the field of wildlife conservation, assists in the design and development of scientifically sound wildlife programs for the management of wildlife and sustainable-use hunting, and demonstrates the constructive role that hunting and hunters play in the conservation of wildlife and in preserving biodiversity worldwide. SCIF currently has conservation programs in partnership with governments and stakeholders in Southern and East Africa, Central Asia, and the western United States, to name just a few.

The Consultation Process

SCI previously sent a letter to Defra officials urging the Department, as an essential component of the consultation, to engage their peers in the environmental ministries and wildlife authorities of the countries that manage the wildlife that will be affected most by any potential importation ban, such as Botswana, Mozambique, Namibia, South Africa, Tanzania, Zambia, and Zimbabwe. Safari Club continues to stress the importance of engaging range states in this process, including those listed above and important exporting countries in North America, central Asia, and South America. This engagement is mandated by comity as well as the Convention on International Trade in Endangered Species of Wild Fauna and Flora (“CITES”).¹ Guided by these principles, this consultation should have started with Defra discussing the issue of trade in hunting trophies directly with representatives from range states and weighing those discussions most heavily when making relevant decisions, if any, to further regulate this trade. Frank discussions with range states would have demonstrated that increased trade restrictions or bans provide no conservation benefits, and the public consultation process and call for evidence is unnecessary.

Safari Club recommends that Defra invite wildlife experts from range states to visit the UK to share information about their conservation programs and the role that hunting plays in those programs. More importantly, Defra officials should visit range states to witness first-hand the important role hunting plays in protection of habitat, anti-poaching, and engaging local stakeholders in the conservation of wildlife. In addition, Safari Club recommends that Defra consult with range states about the impact that a UK importation ban will have on the success of their conservation efforts. Range states may also be able to share lessons learned from their experience with restrictions on hunting to inform the UK’s proposed restrictions on the import and export of hunting trophies.

Although Safari Club recognizes the importance of public engagement on conservation issues, wildlife management decisions, including decisions related to trade in hunting trophies, should not be made based on a popularity vote. The number of “votes” given to the various options presented in the consultation should be of no consequence to Defra. Rather, Defra must make an informed decision based on scientific information contained in Defra’s files and received during this consultation, including after consulting with range states. “To consider evidence to support a ban means listening to those who know most about the science and practice of conservation. Despite what many will say there

¹ For example, in Res. Conf. 6.7, the Parties to CITES “RECOGNIZ[E] the concern of some Parties that stricter domestic measures ... may have an adverse impact on the conservation status of the species concerned in their countries of origin” and therefore recommend that “each Party intending to take stricter domestic measures ... 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...”

is a wealth of evidence and expertise out there and a great many experts to consult.” It would be “shameful” to “disregard [] expertise and knowledge in this entire debate.”²

Likewise, Safari Club respectfully requests that Defra disregard consultation submissions that offer nothing but personal opinions about hunting or trade in hunting trophies. Science should drive this decision, not emotion. Moral opposition to hunting or misinformed beliefs 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. Taken together, these factors reflect the positive impact of well-managed hunting for wildlife recovery and conservation. Understanding and weighing the empirical benefits of well-managed hunting at the species level should be the primary focus in a decision which could reduce those benefits through import and export restrictions.

Safari Club also questions the need for this consultation based on the premise that regulated hunting—“trophy” hunting is regulated hunting—is a driver of species extinction (see ¶ 1). By definition, trophy hunting is selective, often resulting in the harvest of older animals that have already contributed to genetic diversity of its species (e.g., surplus black rhino, older lions, etc.), and used to achieve management goals, such as biological carrying capacity. And as demonstrated in the materials provided with this letter, regulated hunting generates incentives that contribute to the protection of habitat and wildlife populations. As discussed below, trade in hunting trophies is also regulated and monitored to ensure sustainable offtakes.

Adopt Option Four

Defra should adopt the poorly-worded³ “Do nothing” approach and maintain existing controls on trade in hunting trophies. At a minimum, the UK already enforces the provisions of CITES which ensure the accountability and sustainability of trophy imports and exports. CITES rules have been agreed by biologists and policymakers from 183 parties. The trade in charismatic species like elephant, rhino, lion, leopard, and polar bear and lesser known but equally important species like markhor and argali is already heavily regulated through permits and associated legal acquisition and non-detriment determinations. Additionally, as Defra acknowledges (e.g., ¶ 24), import permits—and for some species, science-based “sustainability” findings—are required under EU regulations for Annex A and six Annex B species, which for some species already constitute stricter domestic measures. The UK is also able to influence best management practices for trophy hunting operations globally with these restrictions.

² As documented by Professor Adam Hart on Twitter, conservation expert Dr. Amy Dickman was forced to leave an open meeting in Parliament regarding this consultation because supporters of the Campaign to Ban Trophy Hunting simply did not want her there, <https://twitter.com/adamhartscience/status/1220037461906202624?s=21> (Jan. 22, 2020).

³ The use of the phrase “Do nothing” is misleading, deliberately or not. It suggests Defra does nothing to regulate the trade in hunting trophies. UK hunters are keenly aware that Defra regulates the trade in hunting trophies via CITES and EU regulations. And of course, the UK regulates the hunting and export of native species that are not listed on the CITES Appendices or EU Annexes.

Defra should not adopt options one, two, or three, all of which would impose stricter trade requirements or prohibit trade in lawfully acquired hunting trophies altogether. Defra has not identified a legitimate, science-based need to require any further controls. Imposing additional requirements or prohibiting trade would not benefit conservation efforts. As reflected in the materials provided with this letter, trade restrictions can result in detrimental impacts to conservation efforts by reducing funding and incentives for conservation.

In particular, option three has no scientific basis and would harm conservation efforts worldwide, not just those in Southern and East Africa. Option three would ban import and export of all hunting trophies, including for common species that are over-populated where they are hunted. Safari Club recognizes that those who support bans on trade in hunting trophies do so with the intention of benefitting wildlife conservation, but as Defra suggests, (¶¶ 57, 68) conservation benefits would be lost if it adopts any of these three options and option three would have the most damaging impacts because it would most reduce the well-documented conservation benefits of hunting.

If Defra has concerns about specific hunting operations in certain areas, Defra representatives should consult with the relevant operators and other individuals. For example, Defra lumps “canned hunting” and “captive-bred hunting” into the consultation. Safari Club has taken a position against put-and-take or “captive-bred hunting,” and disagrees that these practices should be included in a broad consultation on “hunting.” If Defra has concerns about these practices, the consultation should be so focused.

Conservation Benefits

Wildlife conservationists agree that hunting benefits conservation. As the materials provided with this letter show, hunting—including so-called trophy hunting—provides benefits for the species hunted, conserves a vast amount of land for wildlife habitat, directly funds anti-poaching efforts, encourages local community participation in conservation, supports livelihoods, and significantly contributes to rural economies. Because of these benefits, evidence demonstrates that many species are doing the very best in the countries where they are hunted. Increased trade restrictions or prohibitions—in the UK or elsewhere—risks diminishing all these benefits. Further, trophy hunting is the only source of wildlife management funding in many rural areas where photographic or eco-tourism is not a viable option. If Defra’s intent is to encourage conservation, rather than simply implementing whichever option is the most popular to the largely misinformed public, then these materials demonstrate that restricting the trade in hunting trophies will not achieve that intent.

Safari Club encourages Defra to review the materials enclosed with this letter.

Conclusion

In summary, Safari Club recommends that Defra decision-makers take no action to further restrict trade in hunting trophies without first consulting with experts from the countries whose wildlife management programs will be affected; invite representatives from those countries to the UK to share information about their conservation programs, the role that hunting plays in those programs and the harms that a

UK importation ban could cause; and visit those countries to personally witness their successful conservation programs.

Safari Club urges Defra to adopt Option Four. Trade in hunting trophies is already regulated, and Defra should maintain those existing controls. Increased restrictions or prohibitions will do nothing to benefit wildlife conservation and could reduce conservation efforts in areas that rely on hunting to incentivize and fund those efforts.

Please contact Jeremy Clare at jclare@safariclub.org for additional information or questions about this letter or materials provided.

Sincerely,



Steve Skold
President, Safari Club International



Warren Sackman III
President, Safari Club International Foundation

ANNEX
MATERIALS DEMONSTRATING THE CONSERVATION BENEFITS OF HUNTING

Attached please find a wealth of recent materials reflecting the benefits of regulated hunting to habitat conservation, increasing wildlife populations, improving livelihoods (particularly for rural communities in remote areas with limited economic opportunities), reducing poaching, and more. This is by no means an exhaustive list. It also does not include references cited in the consultation document. These resources demonstrate that Safari Club is not alone—experts from around the world support regulated hunting, including many non-hunters. They understand that top-down restrictions on hunting do not serve conservation purposes.

A point to take away from each resource is that hunting incentivizes wildlife as a competitive use of land and provides significant funding to protect that land and the wildlife upon it. This is crucial considering human populations continue to grow and wildlife habitat continues to shrink. Another key point reflected throughout the resources is that hunting is an important component of national development strategies in many range nations and encourages private investment in wildlife in other countries.

Safari Club also requests that Defra review and incorporate into this consultation non-detriment findings that Defra received as a member of the EU's Scientific Review Group, including but not

limited to non-detriment findings and communications from Mozambique, Tajikistan, Tanzania, Zambia, Zimbabwe, and other countries.

Safari Club encourages Defra to carefully consider each authority. We stand ready to engage in further discussions or to provide Defra with additional information as needed.

JOURNAL ARTICLES AND STUDIES

- 1) Economic and conservation significance of the trophy hunting industry in sub-Saharan Africa, by Peter A. Lindsey et al., 134 *Biological Conservation* 455-469 (2007), <https://www.perc.org/wp-content/uploads/2015/08/Economic-and-conservation-significance.pdf>
 - Quantifying benefits from regulated hunting in southern and East Africa, including the finding that 22% more habitat is conserved in hunting areas than in national parks (and that number has significantly increased given the development of community-based conservation and growth of private conservancies)
- 2) Science and the recreational hunting of lions, by Andrew J. Loveridge et al., in *Recreational Hunting, Conservation and Rural Livelihoods* (2009)
 - Concluding that hunting of lions “contributes substantially to protection of habitat, particularly in East and southern Africa” and has negligible impact on lion populations when well-regulated and monitored
- 3) The significance of African lions for the financial viability of trophy hunting and the maintenance of wild land, by Peter A. Lindsey et al., *PLoS ONE* 7(1) (Jan. 2012), <https://journals.plos.org/plosone/article?id=10.1371/journal.pone.0029332>
 - Analyzing the potential effects of international restrictions on the hunting of lions, and concluding that given such restrictions, “trophy hunting could potentially become financially unviable across at least 59,538 km² that could result in a concomitant loss of habitat,” with additional “broader negative impacts including reduction of competitiveness of wildlife-based land uses relative to ecologically unfavourable alternatives” and reduced tolerance of the species among rural communities
- 4) Determinants of persistence and tolerance of carnivores on Namibian ranches: Implications for conservation on Southern African private lands, by Peter A. Lindsey et al., *PLoS ONE* 8(1) (2013), <https://journals.plos.org/plosone/article?id=10.1371/journal.pone.0052458>
 - Assessing human tolerance towards carnivores in Namibia; concluding that hunting helps generate revenues that encourage tolerance and reduce retaliatory offtakes;

recommending that restrictions on trade in hunting trophies be removed to “help create incentives for conservation of those species”

- 5) The “Conservation Equation” in Africa, by Southwick Associates (2014),
http://safariclubfoundation.org/wp-content/uploads/2018/10/The-Conservation-Equation-in-Africa_Southwick-Associates-Africa-Economics-Article_Final-2.pdf
 - Computing the value of hunting tourism in Africa including spending per hunter, job creation, contribution to Gross Domestic Product, etc.
- 6) Provisioning of game meat to rural communities as a benefit of sport hunting in Zambia, by Paula A. White and Jerrold L. Belant, *PLoS ONE* 10(2) (2014),
<https://journals.plos.org/plosone/article?id=10.1371/journal.pone.0117237>
 - Quantifying the value of meat distributions from hunting to local communities in Zambia and extrapolating results to conclude that hunting in Zambia contributes (at least) 129,771 kg of game meat per year to local communities
- 7) Cape Mountain Zebra 2014/15 Status Report, by H. Hrabar and G.I.H. Kerley (2015),
<http://ace.nmmu.ac.za/ace/media/Store/documents/Technical%20reports/ACE-Report-63-Hrabar-and-Kerley-2015-Cape-mountain-zebra-survey.pdf>
 - Recommending that implementing a national quota for hunting trophies of Cape mountain zebra could encourage greater investment in this species and thereby expand its range and increase its numbers and genetic diversity
- 8) Unexpected and undesired conservation outcomes of wildlife trade bans – An emerging problem for stakeholders, by Diana Weber et al., 3 *Global Ecology and Conservation* 389 (Jan. 2015),
https://www.researchgate.net/publication/271205282_Unexpected_and_undesired_conservation_outcomes_of_wildlife_trade_bans_-_An_emerging_problem_for_stakeholders
 - Describing problems associated with trade bans, particularly the reduction of conservation incentives; concluding that the ban in lawful trade in polar bears “has not provided the intended outcome of a reduction in polar bear mortality ... but rather contributed to a decline in economic opportunities for Arctic communities” and recommending against use of trade bans that reduce conservation incentives
- 9) The economic contributions of hunting-related tourism in Eastern and Southern Africa, by Southwick Associates (Nov. 2015), http://safariclubfoundation.org/wp-content/uploads/2018/10/Southwick-Associates-2015_FINAL.pdf

- Describing the economic benefits of hunting tourism in eight countries in Africa and concluding (among other things) that the approximately 18,000 hunters per year contributed \$326.5 million per year between 2012 and 2014
- 10) Banning trophy hunting will exacerbate biodiversity loss, by Enrico Di Minin et al., *Trends in Ecology and Evolution* (2016),
https://www.researchgate.net/publication/288931539_Banning_Trophy_Hunting_Will_Exacerbate_Biodiversity_Loss
- Arguing that blanket bans on hunting or trophy imports are detrimental to conservation efforts because they reduce the financial benefits generated from hunting, remove hunting as a viable land-use (particularly in areas where photographic tourism is not viable or is too damaging on the ecosystem), and fail to account for the fact that hunting “places emphasis on maintaining large wildlife populations for offtake, as opposed to ecotourism, where the presence of only a few individual animals is sufficient to maximize profits” (among other reasons)
- 11) Complementary benefits of tourism and hunting to communal conservancies in Namibia, by Robin Naidoo et al., *30 Conservation Biology* 628-38 (2016),
https://www.researchgate.net/publication/282940712_Complementary_benefits_of_tourism_and_hunting_to_communal_conservancies_in_Namibia
- Evaluating the benefits from photographic and hunting tourism for communal conservancies in Namibia and finding that total benefits generated were roughly the same but of different character (i.e., benefits from photographic tourism accrued as salaries and benefits from hunting accrued as income for conservancy management and game meat); concluding that 84% of communal conservancies would be unable to operate if hunting were prohibited, while 41% of conservancies would be unable to operate if photographic tourism were banned
- 12) Extreme wildlife declines and concurrent increase in livestock numbers in Kenya: What are the causes?, by Joseph Ogutu et al., *PLoS ONE* 11(9) (2016),
<https://journals.plos.org/plosone/article?id=10.1371/journal.pone.0163249>
- Analyzing the almost 70% declines in wildlife in Kenya’s rangelands and the contemporaneous increase in livestock between 1977 and 2016; attributing this decline to human population growth, decreasing rainfall, rising temperatures, and “the fundamental cause ... policy, institutional and market failures” to incentivize wildlife conservation

- 13) Zimbabwe lion conservation research report 2016: Sport-hunting and lion (*Panthera leo*) conservation in Zimbabwe, by Byron du Preez et al. (Jan. 31, 2016)
 - Describing the steps taken by Zimbabwe to improve management of lion hunting and the conservation benefits provided by lion hunting in Zimbabwe, citing examples from Buby Valley and Savé Valley Conservancies
- 14) Effects of the safari hunting tourism ban on rural livelihoods and wildlife conservation in Northern Botswana, by Joseph E. Mbaiwa, *South African Geographic Journal* (2018), https://www.researchgate.net/publication/315588293_Effects_of_the_safari_hunting_tourism_ban_on_rural_livelihoods_and_wildlife_conservation_in_Northern_Botswana
 - Concluding that the 2014 moratorium on hunting in Botswana reduced tourism benefits for local communities (e.g., loss of income, employment opportunities, social services), and contributed to the development of negative attitudes towards wildlife among rural residents
- 15) The economic impact of trophy hunting in the south African wildlife industry, by Melville Saayman et al., *Global Ecology and Conservation* 16 (2018), <https://www.sciencedirect.com/science/article/pii/S2351989418302336>
 - Calculating the economic impact of the trophy hunting industry in South Africa and concluding that it generates over \$341 million annually for the South African economy and supports more than 17,000 jobs

PRESENTATIONS

- 16) Sustainable wildlife utilization: Hunting as a conservation tool, by Joseph E. Mbaiwa, Okavango Research Institute, University of Botswana (Sept. 2018), <https://www.fws.gov/iwcc/pdf/presentations/sustainable-wildlife-utilization-hunting-as-a-conservation-tool.pdf>
 - Discussing documented benefits of hunting for rural communities in Botswana; describing results of study on impact of 2014 suspension of hunting on rural communities including revenue and job loss, increased intolerance for elephants and other species
- 17) Central Asia Conservation Initiative, by Kurt Alt, Conservation Director, Wild Sheep Foundation (Mar. 2019), <https://www.fws.gov/iwcc/pdf/presentations/iwcc-presentation-march-2019-central-asia-conservation-intiative.pdf>

- Demonstrating hunting organizations' commitment to conservation, research, and good governance
- 18) A market approach to wildlife conservation in Africa, by Hannah Downey and Catherine Semcer, Property and Environment Research Center (Mar. 2019),
<https://www.fws.gov/iwcc/pdf/presentations/iwcc-market-approach-to-conservation-in-africa-perc.pdf>
- Recommending changes to U.S. policy to improve engagement with African countries, increase conservation benefits, and achieve international development goals
- 19) Prepared statement of Catherine E. Semcer, Research Fellow, Property and Environment Research Center (July 18, 2019),
<https://naturalresources.house.gov/imo/media/doc/Semcer%20Testimony%20WOW%20Leg%20Hrg%2007.18.19.pdf>
- Discussing the importance of U.S. policy in encouraging conservation, including hunting
- 20) Management of protected areas and the political economy of conservation in Africa, by Brian Child, University of Florida (Oct. 16-17, 2019),
<https://www.fws.gov/iwcc/pdf/presentations/management-of-protected-areas-and-the-political-economy-of-conservation-in-africa.pdf>
- Drawing lessons from management of lands and wildlife for over 70 years in Africa; recommending methods of “rewilding” including giving local stakeholders incentives to rely on wildlife instead of agriculture and cattle; noting that hunting pays for 80% of initial rewilding

RANGE STATE DOCUMENTS

- 21) Letter re: proposed rule to list the African lion subspecies as threatened, by Burkina Faso, Mozambique, Namibia, South Africa, Tanzania, Zambia, and Zimbabwe (Jan. 27, 2015)
- 22) Proposal to transfer the Cape Mountain Zebra from Appendix I to Appendix II, by Republic of South Africa, CoP16 Prop. 6 (2016),
<https://cites.org/sites/default/files/eng/cop/17/prop/060216/E-CoP17-Prop-06.pdf>
- 23) Enhancement and non-detriment findings for African lion sport hunting in Zambia, by Zambia Department of National Parks and Wildlife (May 2016)
- 24) Enhancement and non-detrimental findings for *Panthera leo* in Zimbabwe, by Zimbabwe Parks and Wildlife Management Authority (Oct. 2016)

- 25) The role of trophy hunting of elephant in support of the Zimbabwe CAMPFIRE Program, by CAMPFIRE Association (Dec. 2016)
- 26) State of Community Conservation in Namibia, by NACSO (2017),
<http://www.nacso.org.na/resources/state-of-community-conservation>
- 27) Letter to President Trump requesting the lifting of hunting trophy restrictions, by H.E. E.D. Mnangagwa, President of Zimbabwe (Dec. 6, 2017)
- 28) Non detrimental findings report for African leopard sport hunting in Zambia, Department of National Parks and Wildlife (AC30, May 2018),
<https://cites.org/sites/default/files/eng/com/ac/30/E-AC30-15-A5.pdf>
- 29) Review of the leopard (*Panthera pardus*) quota of Mozambique, National Administration for Conservation Areas (AC30, May 2018), <https://cites.org/sites/default/files/eng/com/ac/30/E-AC30-15-A1.pdf>
- 30) Leopard Quota Review: South Africa, by South Africa Department of Environmental Affairs (AC30, May 2018), <https://cites.org/sites/default/files/eng/com/ac/30/E-AC30-15-A3.pdf>
- 31) Export Quota Review – Namibia, by Ministry of Environment and Tourism (AC30, May 2018),
<https://cites.org/sites/default/files/eng/com/ac/30/E-AC30-15-A2.pdf>
- 32) Zimbabwe’s review of the Convention on International Trade in Endangered Species (CITES) Leopard (*Panthera pardus*) quota, Zimbabwe Parks and Wildlife Management Authority (AC30, May 2018), <https://cites.org/sites/default/files/eng/com/ac/30/E-AC30-15-A6.pdf>
- 33) Report on Decision 17.114 regarding African leopard (*Panthera pardus*) quotas established under Resolution Conf. 10.14 (rev. CoP16), United Republic of Tanzania, Ministry of Natural Resources and Tourism (AC30, May 2018), <https://cites.org/sites/default/files/eng/com/ac/30/E-AC30-15-A4.pdf>
- 34) Conservation status and related impacts of elephants and lion trophy ban to Tanzania, by Imani Richard Nkuwi, Director of Wildlife Utilization and Business Services, Tanzania Wildlife Management Authority (Sept. 2018), <https://www.fws.gov/iwcc/pdf/presentations/conservation-status-and-related-impacts-of-elephants-and-lion-trophy-ban-to-tanzania.pdf>
- 35) Sustainable wildlife management in Zimbabwe, by Roseline Mandisodza-Chikerema, Chief Ecologist, Zimbabwe Parks and Wildlife Management Authority (Sept. 2018),
<https://www.fws.gov/iwcc/pdf/presentations/sustainable-wildlife-management-in-zimbabwe.pdf>

- 36) Conservation Hunting: Namibia communal area conservancies, by Maxi Pia Louis, Director, NACSO (Sept. 2018), <https://www.fws.gov/iwcc/pdf/presentations/conservation-hunting-namibia-communal-area-conservancies.pdf>
- 37) Letter opposing CECIL Act (stricter domestic measures in the U.S.), by NACSO (2019)
- 38) Letter opposing the CECIL Act (stricter domestic measures in the U.S.), by Community Conservation Namibia (2019)
- 39) Letter expressing concerns and opposing H.R. 2245 – 116th Congress: CECIL Act (stricter domestic measures in the U.S.), by Tanzania Wildlife Management Authority (2019)
- 40) Statement in support of safari hunting in Botswana, by Ngamiland Communities (Mar. 7, 2019)
- 41) Statement presented by the Republic of Zimbabwe on the Proposed Bill H.R. 2245, by Patience Gandiwa (July 18, 2019)
- 42) Implementation of hunting in Botswana, by Cyril Taolo, Head of Scientific Services, Botswana Department of Wildlife and National Parks (Nov. 2019)
- 43) Overview of sport hunting in Zimbabwe, by Tinaapi Hilary Madiri, Principal Ecologist/National Elephant Coordinator, Zimbabwe Parks and Wildlife Management Authority (Nov. 2019)
- 44) Importance of hunting zone in wildlife management in Cameroon: Case of the North Region, by Serge Patrick Tadjou, Head of Wildlife Department, North Region (Nov. 2019)
- 45) Wildlife resource and sport hunting in Ethiopia, by Elfinesh Woldeyes Zelellew, Director, Wildlife Development and Utilization Directorate EWCA (Nov. 2019)
- 46) Overview of CBNRM in Namibia, by Bright Sanzila, Namibia Ministry of Environment and Tourism (Nov. 2019)
- 47) Wildlife Utilization: Uganda Country Report, Uganda Wildlife Authority (Nov. 2019)

U.S. FISH AND WILDLIFE SERVICE DOCUMENTS

- 48) The Suleiman markhor of the Torgar hills, by U.S. Fish and Wildlife Service, <https://www.fws.gov/endangered/about/vp-151-2014.html>
- 49) Hunters as Conservationists, <https://www.fws.gov/refuges/hunting/hunters-as-conservationists/>

- 50) Questions and Answers for Black Rhino (Oct. 29, 2013),
<http://www.fws.gov/international/permits/black-rhino-import-permit.html#13>
- 51) Successful conservation efforts result in reclassification of rare Pakistani mountain goat under the Endangered Species Act (Oct. 6, 2014), https://www.fws.gov/endangered/what-we-do/pdf/Markhor_NR_fRule_Final.pdf
- 52) Endangered and threatened wildlife and plants; Listing the Straight-Horned Markhor as Threatened with a rule under Section 4(d) of the ESA (Oct. 7, 2014),
<https://www.fws.gov/policy/library/2014/2014-23671.pdf>
- 53) Enhancement finding for wild and wild-managed lions taken as sport-hunted trophies in South Africa for 2017 – 2019 (Aug. 30, 2017)
- 54) Enhancement finding for lions taken as sport-hunted trophies in Zimbabwe during 2016, 2017, and 2018 (Oct. 11, 2017)
- 55) Enhancement finding for lions taken as sport-hunted trophies in Zambia – 2016, 2017, and 2018 calendar years (Oct. 18, 2017)
- 56) Enhancement finding for African elephants taken as sport-hunted trophies in Zimbabwe on or after January 21, 2016 and on or before December 31, 2018 (Nov. 16, 2017)
- 57) Enhancement finding for African elephants taken as sport-hunted trophies in Zambia on or after January 1, 2016 and on or before December 31, 2018 (Nov. 7, 2017)
- 58) How sport-hunting programs are helping to conserve Argali Sheep (Nov. 13, 2017),
<https://www.fws.gov/news/blog/index.cfm/2017/11/13/How-SportHunting-Programs-are-Helping-to-Conserve-Argali-Sheep>
- 59) Enhancement finding for the import of a sport-hunted black rhinoceros trophy taken in Namibia during 2017 (Sept. 7, 2018)
- 60) Enhancement finding for the import of a sport-hunted African lion trophy from Tanzania (2019)

VIDEOS

- 61) How the ban on lion hunting killed the lions, by Mikkel Legarth at TEDxCopenhagen,
<https://www.youtube.com/watch?v=GiyQvm9d4tM>
- 62) Interview with Rose Mandisodza-Chikerema, Chief Ecologist, Zimbabwe Parks and Wildlife Management Authority, <https://youtu.be/S4mDfEvPIGI>

- 63) Interview with Mpho Tjiane, Deputy Director, CITES Policy Development and Implementation, South Africa Department of Environmental Affairs,
<https://www.youtube.com/watch?v=tZXzPviFaZw&t=>
- 64) Interview with Maxi Pia Louise, Director, Namibia Association of CBNRM Support Organizations (NACSO), <https://www.youtube.com/watch?v=ZiioE0J2im0&t=>
- 65) Interview with Charles Jonga, Director, CAMPFIRE Association (Zimbabwe),
https://www.youtube.com/watch?v=6E5qTWq0xC4&feature=emb_title
- 66) Interview with Paul Zyambo, Director, Zambia Department of National Parks and Wildlife,
https://www.youtube.com/watch?v=ICCXGfSHTz0&feature=emb_title
- 67) Interview with H.E. President Masisi, Botswana, on Community Centered Conservation,
<https://vimeo.com/362228527>
- 68) Why Trophy Hunting Can Be Good for Animals, Adam Ruins Everything,
<https://www.youtube.com/watch?v=YUA8i5S0YMU>
- 69) Custodians of the Wilderness—Tanzania, <https://vimeo.com/151281558>
- 70) Custodians of the Wilderness—Zambezi Delta, <https://vimeo.com/215478401>
- 71) Custodians of the Wilderness—Sabie Game Park, Mozambique, <https://vimeo.com/251291744>
- 72) The Fate of the African Lion—Bubye Valley Conservancy, Zimbabwe,
<https://vimeo.com/135337181>
- 73) Voices from the Frontline, Botswana, <https://vimeo.com/343453859>

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- 74) Return of the Markhor, by Stefan Michel, Contractor with the German development cooperation agency GIZ, *Sports Afield*, <https://sportsafield.com/return-of-the-markhor/>
 - Describing the incentives generated by regulated hunting for community-based conservation in Tajikistan and resultant increase in markhor and snow leopard populations
- 75) Bontebok: Back from the brink, by Joseph Mulders, <https://www.wrsa.co.za/wp-content/uploads/2015/10/SACS-Bontebok-DPS.pdf>

- Explaining the recovery of bontebok populations in South Africa due in large part to the contributions of regulated hunting
- 76) Tajikistan brings endangered wild goat from the edge of extinction to the peak of hope, by National Geographic (June 11, 2014), <https://blog.nationalgeographic.org/2014/06/11/tajikistan-brings-endangered-wild-goat-from-the-edge-of-extinction-to-the-peak-of-hope/>
- Explaining the benefits of markhor hunting for communities in Tajikistan and the recovery of the species, as well as its predators (snow leopard and brown bear)
- 77) Trophy imports suspension impact on CAMPFIRE communities, by Charles Jonga, Director, CAMPFIRE Association, *NewsDay Zimbabwe* (June 24, 2014), <https://www.newsday.co.zw/2014/06/24/trophy-imports-suspension-impact-campfire-communities/>
- Describing the many benefits that hunting brings to Zimbabwe's community-based natural resources management program, CAMPFIRE, and how trophy import bans diminish those benefits
- 78) How hunters and artists helped save North America's waterfowl, by Alexandra Class Freeman (2015), <https://academy.allaboutbirds.org/duck-stamps/>
- Describing the success of the U.S. Duck Stamp program in recovering the wood duck and other waterfowl
- 79) Black rhino hunt: Why killing one bull is worth it for conservation, by Mike Knight and Richard Emslie, *CNN.com* (May 21, 2015), <https://www.cnn.com/2015/05/21/opinions/rhino-hunt-is-conservation/index.html>
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- 81) How trophy hunting can save lions, by Terry L. Anderson and Shawn Regan, *Wall Street Journal* (Aug. 6, 2015), <https://www.wsj.com/articles/how-trophy-hunting-can-save-lions-1438903734>

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- 82) A hunting ban saps a village's livelihood, by Norimitsu Onishi, *New York Times* (Sept. 12, 2015), <http://www.nytimes.com/2015/09/13/world/a-hunting-ban-saps-a-villages-livelihood.html>
- Reporting on the detrimental impact of the moratorium on hunting in Botswana to rural communities
- 83) What if we banned trophy hunting in Africa?, by Conservation This Week (Oct. 23, 2015), <https://www.conservationmagazine.org/2015/10/what-if-we-banned-trophy-hunting-in-africa/>
- Discussing study by researcher in Namibia that quantified the detrimental impact of banning hunting
- 84) Prince William is talking sense – trophy hunting is crucial to conservation, by Richard Emslie and Michael Knight, Chairs of the IUCN African Rhino Specialist Group, *Independent* (Mar. 19, 2016), <https://www.independent.co.uk/voices/comment/prince-william-is-talking-sense-trophy-hunting-is-crucial-to-conservation-a6940506.html>
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- 85) Six examples where hunting helped preserve wildlife, by Brad Fitzpatrick (July 25, 2016), <https://www.petersenshunting.com/editorial/6-examples-where-hunting-helped-preserve-wildlife/272365>
- Reporting on the crucial role of hunting in preserving wildlife habitat and the resultant recovery of six species (waterfowl, Bukharan markhor, Cape buffalo, whitetail deer, wild turkey, and bighorn sheep)
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- 87) Why you shouldn't be outraged by elephant hunting, by Wes Siler, *Outdoor Online* (Nov. 20, 2017), <https://www.outsideonline.com/2262681/why-you-shouldnt-be-outraged-elephant-hunting>
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- 88) The voice missing from the trophy hunting debate? Africans, by Rosie Cooney, Chair of the IUCN Sustainable Use and Livelihoods Specialist Group, *Washington Post* (Nov. 21, 2017), https://www.washingtonpost.com/opinions/the-voice-missing-from-the-elephant-trophy-debate-africans/2017/11/21/604a3228-ce39-11e7-a1a3-0d1e45a6de3d_story.html
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- 91) Utah's front line against poaching, by Utah Division of Wildlife Resources (Feb. 13, 2018), <https://www.gameandfishmag.com/editorial/utahs-front-line-against-poaching/347533>
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- Interviewing Shafqat Hussain, an anthropology professor at Trinity College and National Geographic "emerging explorer," about the benefits of markhor hunting for communities in Pakistan and the recovery of the species

- 93) Trophy Hunting, Part Three: Not quite the end of the game, by Dilys Roe (Chair of the IUCN Sustainable Use and Livelihoods Specialist Group) et al., *Daily Maverick* (May 13, 2019), <https://www.dailymaverick.co.za/article/2019-05-13-trophy-hunting-part-three-not-quite-the-end-of-the-game/>
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