

14 June 2021

Rt. Hon. Boris Johnson MP
Prime Minister, First Lord of the Treasury,
Minister for the Civil Service, and Minister for the Union
10, Downing Street
London
SW1A 2AA
United Kingdom

Dear Prime Minister,

Safari Club International (SCI) urges the United Kingdom to maintain current regulations related to trade in hunting trophies, rather than adopting new trade restrictions or prohibitions. SCI specifically opposes the Action Plan for Animal Welfare's proposed ban on the import of hunting trophies from endangered animals. Regulated hunting generates crucial conservation incentives. Research has shown that trade restrictions often have the unintended consequence of reducing these incentives and therefore harming wildlife conservation efforts.

Countries around the world rely on hunting as part of their conservation strategies. The benefits of regulated hunting in southern African countries, including Botswana, Mozambique, Namibia, South Africa, Tanzania, Zambia, and Zimbabwe, are well-documented. For [many reasons](#), the UK should not adopt a trophy import ban.

Abundance: The world's largest populations of elephant, leopard, lion, black and white rhino, and many other species inhabit the southern African countries where they are hunted. For example, almost all rhinoceros (black or white), over 81% of elephant, and most lion and giraffe inhabit southern African countries. This is not a simple coincidence. These countries maintain robust populations of species that are endangered elsewhere, precisely because of [successful sustainable-use hunting programs](#). Prohibiting the import of lawfully harvested wildlife will [reduce the benefits](#) that regulated hunting generates to support continued conservation of these species.

Habitat Protection: Hunting secures significant wildlife habitat, ameliorating the greatest threat facing many species. A [2007 study](#) calculated that areas used for hunting, which are thus protected from agricultural, residential, or industrial development, were 22% larger than national parks in the countries that depend on hunting as a conservation tool. That percentage is higher today as more private and communal land has been converted to hunting areas since 2007. In Zimbabwe alone, hunting areas—including 19,000 km² in safari areas, 50,000 km² in communal lands, and 11,000 km² in private lands—are about three times larger than the national parks (28,000 km²) and over 50% larger than protected areas in Kenya, which does not permit regulated hunting. Elephants are the source of most hunting revenue in Zimbabwe.

Since 2007, [Trans-Frontier Conservation Areas](#) (TFCAs) have formed to protect habitat across national borders. TFCAs connect parks, hunting areas, and communal and private lands to

collaboratively manage natural resources for the benefit of both rural people and biodiversity. For example, the [Kavango-Zambezi TFCA](#) is nearly twice as large as the UK and encompasses crucial elephant range across Botswana, Namibia, Zimbabwe, and Zambia. This model is working: “Southern Africa continues to hold by far the largest number of elephants on the continent, and [nearly 75%](#) of [these] occur as part of a single population in the Kavango Zambezi Transfrontier Conservation Area.” Hunting areas comprise large segments of TFCAs, and hunting revenues fund TFCA management. A trophy import ban would harm effective management of TFCAs and unnecessarily put large amounts of habitat at risk.

Anti-Poaching: Hunting generates significant funding for government law enforcement, while simultaneously reducing the government’s burden by authorizing operators and private and community scouts to conduct anti-poaching operations on leased concessions and private and communal lands. The anti-poaching contributions of individual hunting operators are significant. As one example, an operator in Zimbabwe’s Dande area invested \$85,000/year on anti-poaching. From 2010-2016, these efforts led to an [80% decline in elephant poaching](#) in an important border region. Similarly, safari operators in Tanzania are bound by government regulations to invest in anti-poaching and community development. They do far more than the legal minimum. A [2013-2016 analysis](#) “showed that hunting operators in [Tanzania] contribute[d] about \$19.5 million in conservation of wildlife,” including significant spending on anti-poaching.

According to data from the Convention on International Trade in Endangered Species (CITES), these efforts have successfully combatted poaching. A [2020 analysis](#) confirms that the Proportion of Illegally Killed Elephants in southern Africa has never exceeded the 0.5 sustainability threshold, and has been declining—meaning elephant poaching has receded—in southern Africa since 2011. A UK trophy import ban will diminish these anti-poaching efforts by reducing the funding available to governments, private operators, and communities.

Rural Community Livelihoods: Rural people must benefit from sharing their land with wildlife or the habitat will be converted to agriculture, grazing, and other human uses. Hunting [revenues and benefits](#) like meat distribution from hunter-harvested wildlife provide incentives to protect habitat, pay for community game guards, and reduce retaliatory killing of nuisance animals, including elephants.

In Zimbabwe, for example, fees from elephant hunting alone generated nearly [\\$1.6 million](#) for rural communities in 2013. That income was used for field patrols, water provision, investments in food security, construction of schools and clinics, and much more. These benefits offset the significant costs of living alongside elephants and other dangerous animals. In the period 2010-2015, 96 people in Zimbabwe’s rural areas [lost their lives](#) to wildlife attacks. Over 7,000 hectares of crops were destroyed by elephants—a loss borne by communities already living in areas prone to drought, making the impact even more acute.

Namibia’s community-based conservation program supports [86 conservancies](#) covering over 180,000 km² of wildlife habitat and including over 227,000 people. Most conservancies depend on hunting to sustain their operations. More than half rely solely on hunting to generate benefits for residents. [Research](#) found that if hunting were banned in Namibia, approximately 80% of conservancies would no longer be able to sustain their operations, thereby putting over 50,000 km² at risk of conversion to habitat unsuitable for wildlife. More than 55% of benefits are directly attributable to elephant hunting alone. Under this conservancy model, wildlife has

flourished. Namibia's elephant population has [grown](#) from 7,500 in 1995 to over 22,000 in 2016, during a time when elephant populations dwindled in countries without regulated hunting programs. These examples focus on the benefits of elephant hunting, but hunting rhino, lion, and many other species that may be endangered in other parts of Africa [generate similar benefits](#). Adoption of import restrictions will reduce those benefits on which rural communities depend.

Import Restrictions Do Not Conserve Wildlife: Range countries and rural communities that benefit from hunting consistently oppose import restrictions because these restrictions do not work to conserve wildlife, threaten national sovereignty, and negatively impact vulnerable communities. For example, leaders of southern African countries have [repeatedly](#) and [publicly opposed](#) politicized efforts to restrict hunting trophy imports. African communities have fought back against efforts to restrict their self-determination and dictate available conservation methods. Recently, more than 50 community leaders published a [letter](#) requesting that UK-based celebrities who oppose hunting “acknowledge both our conservation successes and our communities’ rights to earn a livelihood through the culturally appropriate and sustainable management of our resources for the benefit of our people and our wildlife.” These community leaders emphasized that 50-90% of economic incentives “to live with and sustainably manage wildlife” come from “regulated, humane and scientifically verified hunting methods,” leading “to increasing wildlife populations and habitat.”

Rather than expending resources to assist conservation programs in Africa, import bans aim to obstruct successful regulated hunting. Such prohibitions provide no benefits to the countries that manage the species concerned; rather, they actively diminish conservation benefits derived from sustainable use programs. [Hunting is essential](#) because it secures and successfully increases large amounts of the habitat for both hunted and non-hunted species, provides funding for anti-poaching programs, provides operating revenues for wildlife management departments, and incentivizes local communities to conserve wildlife. Policies that diminish such benefits should not be considered, much less adopted.

More information on the benefits of hunting and information from range countries is available at www.safariclub.org/huntthefacts.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Scott Chapman', with a stylized initial 'S'.

Scott Chapman
President, Safari Club International