

Trophy hunting consultation response

Wildlife and Countryside Link response – February 2020

This response is supported by the following organisations:

- Badger Trust
- Born Free Foundation
- Four Paws
- League Against Cruel Sports
- Naturewatch Foundation
- RSPCA
- Whales & Dolphin Conservation

Question 1: What is your name? **Jodie Le Marquand**

Question 2: What is your email address? jodie@wcl.org.uk

Question 3: What is your organisation? If you're replying as an individual, please type 'individual'.
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Question 4: Would you like your response to be confidential? (Required)

No (if yes you need to provide a reason)

Question 5: Is there anything you would consider to be a hunting trophy that falls outside of the definition found in CITES and the EU Wildlife Trade Regulations?

a. Yes

b. No

c. If yes, please add more information

The hunting by paying sporting clients of species other than those listed in the CITES Appendices/EU Wildlife Trade Regulations Annexes is understood to take place in the UK. This includes the hunting of

captured red deer released into an enclosed area, colloquially referred to as 'canned hunting', for which clients are charged trophy fees. Consideration should be given to the inclusion of such species and activities in the definition of hunting trophies.

There are welfare-related concerns such as inexperienced paying clients as cited in our response to the call to evidence, and the UK trophy hunting [reported](#) in the press and [advertised](#) commercially, with trophy hunting and canned hunting of deer also recently acknowledged in the [report](#) of the Scottish Deer Working Group.

Question 6: Is there anything that falls within the definition used in CITES and the EU Wildlife Trade Regulations that you consider should not be treated as a hunting trophy?

- a. Yes
- b. No**
- c. If yes, please add more information

Question 7: Do you envisage any challenges or difficulties which might arise from using the definition in CITES and EU Wildlife Trade Regulations, for example, when it comes to enforcement?

- a. Yes**
- b. No
- c. If yes, please add more information

Yes, the trophy and its permit are linked to an individual, but nevertheless the trophy may enter the market where it can be difficult to verify the origin/legality of the product. The trophy can enter the market as a whole or in parts (even grinded), in the latter it can be particularly challenging to detect the trophy and determine its origin/legality. The problem may be that use of the definition would mean that trophies derived from species that are not listed in the CITES Appendices/EU Wildlife Trade Regulations Annexes would be exempt from any new restrictions

Question 8: We set out a number of options above. We would like to understand your preferred option and the reasons for that preference. Please state your first and second preferred options:

- a. Option one: A ban on hunting trophies from certain species entering or leaving the UK.
- b. Option two: Stricter requirements for clear benefits to conservation and local communities to be demonstrated before hunting trophies from certain species are permitted to enter or leave the UK.
- c. Option three: A ban on all hunting trophies entering or leaving the UK.**
- d. Option four: Do nothing - continue to apply current controls based on internationally agreed rules.
- e. None: Please suggest any alternatives. Please add any comments on your preferred options, including any reasons for your preference.

WCL's first choice is c. Option three

Please note: This is the view of some, not all, Link members. Not all members are in agreement on their preferred option.

From an animal welfare point of view, trophy hunting raises serious concerns as the killing of the animals is often inhumane (instant deaths are rare, especially if bow and arrows are used as weapons)¹, some animals may not be killed, but end up wounded and suffering for many hours (Cecil the lion took more than 40 hours to die after he was shot with an arrow²).

The purported economic benefits from the perceived value of trophy hunts to local communities are often greatly exaggerated³, and may in fact deprive local communities of alternative economic revenues that could be more lucrative in the long term. Trophy hunting as a viable economic model for protecting large areas of land is on the decline. There are a number of factors, including the decline in wildlife populations making it harder to find trophy animals and hunting concessions being encroached upon by human development. Even according to the hunters' own figures, trophy hunting is rarely capable of generating the needed levels of revenue to sustain an area for conservation purposes⁴. So at best, it is just one contribution that has to be topped up by other funding sources and at worst (due to incompatibility with other uses and sources of funding) it is preventing other sources of financing being accessed or used to sustain conservation in those areas.

The majority of trophy hunters are from developed countries such as the United States or Western Europe, and the most common animals targeted are African megafauna (such as big cats, elephants, rhinoceros, buffalo, and antelopes). Trophy hunters frequently target the genetic traits of individuals⁵ that make them the most successful in the wild e.g. male lions with big manes, thereby negatively affecting the reproductive success of future generations of that species. Some companies are returning concessions because of depleted wildlife levels, especially of key target species, meaning they are unable to make a profit. Trophy hunting can often siphon off wildlife from adjacent protected areas, as animals move around certain territories. As quota setting is often not based on adequate science (or any at all) and this can impact on population viabilities⁶. It can reduce population connectivity and resilience, and can have genetic consequences such as reductions in body, horn and/or tusk size. It has also been used as a means of 'laundering' high-value products into lucrative illegal markets (eg rhino horn).

¹ Stephen S. Ditchkoff *et al.*, "Wounding Rates of White-Tailed Deer With Traditional Archery Equipment," *Proceedings of the Annual Conference of the Southeastern Association of Fish and Wildlife Agencies* (1998).

² A.J. Loveridge *et al.* *Biol. Conserv.* **134**:548 (2016). Cecil: A Moment or a Movement? Analysis of Media Coverage of the Death of a Lion, *Panthera leo* <https://www.mdpi.com/2076-2615/6/5/26>

³ The Economist at Large Feb 2013; The \$200 million question How much does trophy hunting really contribute to African communities? <https://www.ecolarge.com/work/the-200-million-question-how-much-does-trophy-hunting-really-contribute-to-african-communities/>

⁴ Chardonnet, Bertrand; Feb 2019; Africa is changing: Should its Protected Areas evolve? Reconfiguring the Protected Areas in Africa https://www.researchgate.net/publication/331409134_Africa_is_changing_Should_its_Protected_Areas_evolve_Reconfiguring_the_Protected_Areas_in_Africa

⁵ D.W. Coltman *et al.* *Nature* **426**: 655 (2003); Undesirable evolutionary consequences of trophy hunting <https://www.nature.com/articles/nature02177>

⁶ Caro, et al The impact of tourist hunting on large mammals in Tanzania: an initial assessment. *Afr. J. Ecol.* **36**, 321–346 <https://onlinelibrary.wiley.com/doi/abs/10.1046/j.1365-2028.1998.00146.x>

A complete ban would recognise the clear and consistent message from public opinion polling that the overwhelming majority of the British public do not support trophy hunting. In an online Suration poll of over 1,000 British adults conducted in July 2019, 63% of respondents were 'strongly supportive' and a further 12% were 'supportive' of a ban (<https://www.suration.com/wp-content/uploads/2019/07/Ban-Trophy-Hunting-Final-Tables.xlsx>). In another Suration poll of over 2,000 adults living in the UK conducted in September 2019, 86% of respondents agreed that 'Trophy hunting should be universally banned' (<https://www.suration.com/wp-content/uploads/2019/10/Ban-Trophy-Hunting-Tables.xlsx>).

It may even help to provide cover for a black market⁷ in wildlife trophies through re-export permits. The scale of the trade is under reported and leaves individual countries to assess the trade to see if it is sustainable⁸, which is not sufficient to monitor the impacts on populations that range across national boundaries. The stated economic value of trophy hunting by its proponents does not consider the value of other forms of conservation initiatives, like eco-tourism, which are lost due to the presence of trophy hunting and can sometimes have far greater value to country economies and for conservation as a whole.

WCL does not support trophy hunting, and urges the UK Government to invest in sustainable tourism and other income generation projects with local communities (such as payments for ecosystem services, land-lease agreements, carbon offsetting etc) that help protect those areas currently used for trophy hunting concessions and make sure that they retain their current maximum conservation potential and ensure they are not lost to other uses not compatible with conservation.

Ifaw's research on the Global Trophy Hunting trade can be found on the following link:
<https://www.ifaw.org/news/killing-for-trophies-an-analysis-of-global-trophy-hunting-trade>

WCL's second option would be a combination of a. Option One (certain species), b. Option two (demonstrating benefits) and additionally (certain countries)

As far as a second choice option is concerned it would be a combination of **a. Option One** (certain species), **b. Option Two** (demonstrating benefits) **and additionally** (certain countries), so this would include banning the hunting trophies from certain countries. WCL have seen trophy import bans from certain countries before, in the EU and elsewhere. This mostly has to do with corruption on Non-Detriment Finding (NDF) evidence, corruption with evidence on wild versus captive bred, and corruption around export permits. If trophies are still allowed to enter and leave the UK there should still be a. **Option One:** a ban for certain species, b. **Option Two:** a (temporary) ban for the import from certain counties and evidence of benefits for local communities. Not evidence coming from the exporting country, but evidence collected by the import country itself (in this case the UK).

⁷ T. Milliken & J. Shaw, "The South Africa–Viet Nam Rhino Horn Trade Nexus" (TRAFFIC) (2012).
https://www.trafficj.org/publication/12_The_SouthAfrica-VietNam_RhinoHorn_Trade_Nexus.pdf

⁸ J. Selier *et al.*, *J. Wildlife Manage.* **78**, 122 (2014). Sustainability of elephant hunting across international borders in southern Africa: A case study of the greater Mapungubwe Transfrontier Conservation Area
<https://wildlife.onlinelibrary.wiley.com/doi/abs/10.1002/jwmg.641>

Question 9: Options one and two introduce further restrictions for certain species. Which species do you think these further restrictions should apply to?

a. Species listed on Annex A or B of the EU Wildlife Trade Regulations

b. Species listed on IUCN Red List

c. Other

d. Please add any comments (If b.) Please specify which IUCN Red List categories you think these further restrictions should apply to (e.g. critically endangered, endangered, vulnerable)? (If c.) Please tell us which species you think should be affected by further restrictions on the import and export of hunting trophies, either by identifying a framework to use, or submitting your own list, accompanied by an explanation for your answer.

Option A: WCL would support the proposal to include all species listed on Annex A and B of the EU Wildlife Trade Regulations to which restrictions should apply .

They should, as a minimum, include all species listed on the CITES Appendices and/or EU Wildlife Trade Regulation Annexes, AND species classified on the IUCN Red List as threatened (vulnerable, endangered, critically endangered), near-threatened, or data deficient.

Question 10: Do you think there should be different restrictions on hunting trophies imported and exported to and from countries within the EU, compared with countries outside of the EU? While the UK is a member of the EU, we will continue to meet our EU obligations. This means that any new restrictions on imports and exports of hunting trophies which go further than those contained in the EU Wildlife Trade Regulations would need to be in accordance with EU law. After we leave the EU, the European Union (Withdrawal) Act 2018 will ensure that the EU Wildlife Regulations remain part of UK law. Any new restrictions would need to be considered in accordance with our future relationship with the EU. If new controls are taken forward, consideration will need to be given to whether those controls should also apply to movement to and from EU countries.

a. Yes

b. No

c. Please add any comments.

Where you think there should be different restrictions, please provide information on what you think the differences should be and why.

Question 11: Do you have additional information or evidence on: a. Potential impacts of increased restrictions as set out in options one to three? b. Potential barriers to implementation for options one to three?

Potential impacts

The UK government should not perpetuate extractive activities like trophy hunting that cannot be ethically justified, only achieve sustainable solutions in narrow settings, and invariably have negative consequences when they go wrong. However, to avoid any unintended consequences if bans on trophy imports are put in place, then the UK Government should also provide additional resources for those countries where the protected area management authority's business model is built on revenue generated by hunting. We're effectively pulling the rug from under them without immediate alternatives. If a hunting ban is introduced without adequate alternative management strategy in place, there could be short term negative impacts for some species as well as the livelihoods of rural communities.. The Botswana overnight hunting ban serves as an example.

These new resources to hunting areas and countries need to ensure that hunting land is retained as part of the wider conservation estate, so it is not lost to other uses, such as agriculture, resource extraction or human encroachment. If we are to reverse the decline in endangered species and protect ecosystems we need to ensure land outside of protected areas is also part of the wider conservation estate, as a significant proportion of all species which are threatened live outside national parks. Land currently set aside for hunting concessions (whether currently used for hunting or not) needs to be retained for conservation purposes and to support community livelihoods. The UK should help fund such initiatives, so people and animals can thrive together.

Potential Enforcement problems

By having a blanket ban covering Annex A and B to all imports and exports it make enforcement much simpler by removing any grey areas.

Potential barriers for Option one to three

The hunting community would be opposed to any restrictions imposed, but it would gain a lot of support from welfare and other conservation organisations. WCL would reiterate that any ban should be accompanied by investment from the UK to protect former hunting concessions and retain those areas' conservation value, working with local communities to invest in income generation schemes like eco-tourism, payment for ecosystem services and conservation land leasing to make sure these areas can contribute to a wider landscape approach to species conservation. Such investment is desperately required already, regardless of whether the UK bans hunting trophy imports, to ensure land with conservation value is not lost to incompatible human development use, particularly when such areas are close to, or border National Parks. However, to avoid the accusation that a UK hunting trophy import

ban is contributing to or hastening the loss of land with conservation value, such investments would constitute an important and holistic approach.

Question 12: In options one, two and three, do you think there should be different restrictions on hunting trophies obtained from; wild animals, captive bred animals, or animals involved in canned hunting?

a. Yes 18

b. No

c. Add any comments (If a.) i. hunting trophies from captive bred animals (including canned) should have additional controls ii. hunting trophies from wild animals should have additional controls iii. Other

c. If option 3 of an all-out ban is not considered, then a total ban on canned hunting should be included under options 1 and 2 as there is absolutely no conservation benefit from canned hunting.

Question 13: For options one, two and three, do you think there should be any exemptions considered? Please state your reasons why.

a. Yes

b. No

c. Please add any comments

Yes for the movement of exhibits hunted prior to any ban being introduced, between certified or registered Natural History museums for the purpose of education only

Question 14: Do you agree with our proposed enforcement regime?

a. Yes

b. No

c. Please add any comments

- a. Yes. WCL would also advocate for an increase in the capacity of the National Wildlife Crime Unit (NWCU) to be able to investigate wildlife crime and would strongly recommend that permanent funding for the Unit be approved by the Government. This additional capacity will also help

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tackle cyber enabled wildlife crime in endangered species taking place online as well as helping to investigating the movement of hunting trophies if a ban is introduced.