



Environment, Food and Rural Affairs Committee

Oral evidence: Animals Abroad Bill, HC 511

Tuesday 2 November 2021

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Members present: Neil Parish (Chair); Dave Doogan; Dr Neil Hudson; Robbie Moore; Mrs Sheryll Murray; Derek Thomas.

Questions 1 - 51

Witnesses

I: Dr Mark Jones, Head of Policy, Born Free Foundation; Eduardo Goncalves, Founder, Campaign to Ban Trophy Hunting; and Dr Audrey Delsink, Wildlife Director, Humane Society International UK.

Written evidence from witnesses:

- [Born Free Foundation](#)
- [Campaign to Ban Trophy Hunting](#)
- [Humane Society International UK](#)



Examination of witnesses

Witnesses: Dr Mark Jones, Eduardo Goncalves and Dr Audrey Delsink.

Q1 **Chair:** Welcome to the EFRA Committee, looking at trophy hunting and the forthcoming Bill. We are delighted to have some what I consider great experts before us. I will start in reverse order this time. For the record, would you introduce yourselves briefly?

Eduardo Goncalves: Good afternoon, Mr Parish, and Committee members. Thank you very much indeed for looking at this issue and for inviting me to provide evidence this afternoon. I am the founder of the Campaign to Ban Trophy Hunting.

Dr Jones: Thank you very much for inviting me to give evidence today. I trained as a vet at Liverpool University and then spent my time during my career working on the health and welfare of wild and domesticated animals in the UK and overseas. I joined the UK-based wildlife charity Born Free in 2014 where I am currently head of policy.

Dr Delsink: I am the wildlife director for Humane Society International Africa, based in South Africa. I am a biologist and a registered ecologist with the Council for Natural Scientific Professions. I have worked in and managed protected areas in the South African landscape for 20-odd years, having lived and worked among conflict situations and managed the landscape for that length of time.

Chair: Thank you very much. Are you beaming in from South Africa?

Dr Delsink: That is correct, from South Africa.

Q2 **Chair:** Excellent. This is one benefit of being able to go on Zoom or Teams. Thank you very much for joining us. I will start with the first question. If it is all right with you all, I will refer to you by your Christian names. Are you happy with that? If you want your official titles, you can have them. It is up to you. You are happy with Christian names? Okay.

We are still waiting for the Government to publish the Animals Abroad Bill. Given the small number of hunted trophies imported into the UK, why should this Bill be a legislative priority? You have to put your case to us on why this should be a priority. Who would like to start with that one? Shall we bring in Mark?

Dr Jones: I am happy to speak briefly on this. Thank you very much. I will start by saying that Born Free is ethically opposed to the hunting or killing of any animals for sport or pleasure. We also challenge the claims made by proponents of trophy hunting that it delivers significant or irreplaceable conservation or community benefits or that it positively contributes to the sustainable use of wildlife.

As you have implied, the UK is by no means the biggest destination for international hunting trophies. Nevertheless, UK-based hunters frequently travel overseas to kill animals for fun, including species that are



threatened with extinction, and ship the trophies home. In the decade to 2019 some 2,234 items identified as trophies derived from CITES-listed species were declared to have been exported to the UK and the global total for that period is around 330,000 trophy items. For clarity, these are species listed in the appendices of the Convention on International Trade in Endangered Species of Wild Fauna and Flora, CITES. International trade in those species is subject to regulation under that convention. The trophies exported to the UK during that decade included 575 elephant items alongside almost a tonne of elephant tusks, 295 brown and black bear trophies, 280 hippo trophies, 228 baboon trophies, 144 zebra trophies, 99 lion trophies, 78 leopard trophies and four giraffe trophies.

I have quoted the exported to the UK figure rather than the imported by the UK figure because not all trophies from CITES-listed species require an import permit to be issued by the UK authorities and those that don't will not appear among the CITES trophy database import figures. These are just the trophies from CITES-listed species that require permits from their country of origin. Many more trophies from non-listed species that don't appear on the database may well come across our borders.

I think a ban on trophy imports would send a very clear signal from the UK that it does not condone the brutal killing of these wild animals for this so-called sport by UK citizens and we believe it would reflect the wishes of the overwhelming majority of the British public.

Q3 Chair: Thank you. I will bring in Audrey from a South African point of view, and perhaps even an African point of view, on where you see the reason for this Bill and how it will affect you in South Africa and beyond.

Dr Delsink: First, I want to say that we can't deny that globally wildlife populations are rapidly declining for a number of reasons—poaching, climate change, habitat loss and degradation, human-animal conflicts and other human-induced activities. We are currently experiencing mass extinction and there is no going back. Our great leveller is biodiversity loss and climate change and this is directly linked to human population and extractive nature. There is a landmark report by the Intergovernmental Science-Policy Platform on Biodiversity and Ecosystem Services, the IPBES, of which I am sure you are aware. It has warned that 1 million wild animal and plant species are now threatened with extinction and direct exploitation, which includes trophy hunting, is one of the main causes.

Trophy hunting has been shown to have a detrimental impact on conservation of endangered species and that the species that are highly sought after by trophy hunters, such as leopards, elephants, rhinos and lions, have experienced sharp declines in recent decades. Furthermore, selective removals could also weaken wild animals' survival and their adaptation to climate change, thus further increasing their risk of extinction.



Research from the Queen Mary University of London has revealed that trophy hunting has far more profound impacts on wildlife than was previously thought. The authors relied on the sexual selection theory that the fittest males typically bred and found that the sort of selectivity associated with human predation led to uniquely severe impacts on harvested populations. Therefore, this needs to be considered when you look at environmental change such as climate change. They concluded that the effect of selective harvesting on extinction risk and environmental change appears to be strong and should at least be considered when strong sexually selected species are harvested. Their study illustrates not only the need to consider environmental changes in decision-making about the effects of trophy hunting but also the need to ensure that such harvesting does not increase extinction risk.

This is quite critical when you look at it from an African perspective because importing countries are dependent on the information that is provided by exporting countries, for example non-detriment findings and quotas. These are often outdated or based on national level population estimates versus local population dynamics where the animal will be taken. In country there is tremendous pressure and vested interests with income-dependent stakeholders that submit the data. Consequently, proper management and recording of offtake due to poaching or conflict with the livestock owners is poor and decisions are not based on what is best for the species. It is impossible to ensure that offtake from trophy hunting is sustainable. External importing countries must fully support sound science and conservation practice that is not driven by these vested or conflicting interests.

Q4 Chair: Sorry to interrupt for a moment, but how do you see us joining up? What is happening from the countries where the trophy may be shot or taken or hunted into the information that we receive in the UK, Europe or America? What can we do much better, let alone the Bill itself? It is how it is policed and monitored in the future, isn't it?

Dr Delsink: Absolutely, but I think that the information that is supplied and received by you needs to be carefully weighted and viewed, and that is often the problem. That is why by the UK adopting a ban you would be taking a precautionary approach, which is absolutely definitely in order. The restriction would impose a means of species conservation because you would be reducing the number of wild animals that would be killed, so you would be directly conserving the species taken by adopting a precautionary approach that is critically essential to the conservation of our species right now. Furthermore, by doing so you would be demonstrating leadership in opening a conversation for support of genuine non-consumptive conservation efforts, which is critical at this juncture.

Q5 Chair: Thank you very much. I will bring in Eduardo now, not only for an opening statement on my first question but should the Bill ban the import of all hunted trophies, not just those from endangered animals? If you



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could incorporate that and I will come back to the others if they want to make comment on the last bit.

Eduardo Goncalves: Yes, I will most certainly address that point. The first thing to make clear is that when we are talking about trophy hunting we are not talking about hunting in the conventional sense. This is not about killing an animal for food or fuel or skins. We don't eat lion meat, nobody needs to use elephant skins, we don't use cheetah for fuel and so on. This is taking an animal's life purely as a leisure activity and for furnishing. It is not a human necessity; no human need is being met by it.

Secondly, everyone at the moment is very much focused on the climate crisis, and we are very fortunate to be hosting a global summit on this. We face a conservation crisis every bit as serious as the climate crisis. We are in an age of mass extinctions and trophy hunting is specifically contributing to this crisis in two ways. It is taking a significant number of animals from already declining and fragmented populations but also it is accelerating a process of artificial selection. It is removing the best genes from a species—you want to shoot the biggest and strongest animals because they look the best.

Unfortunately our Government are contributing to that by giving British trophy hunters permits to bring home those trophies. Let me give you the example of polar bears. This a species very much associated with the climate crisis and we have recently learnt by a written answer from a Member of Parliament that DEFRA has issued import permits for British trophy hunters wishing to bring back trophies of polar bears. Elephants are another example. We know from hunting industry records that the tusks of elephants are getting smaller and many more elephants now have no tusks whatsoever. In the Addo Elephant National Park in South Africa, 98% of the adult females have no tusks whereas it is just 3% in the Kruger National Park where there is no trophy hunting. I received an alert yesterday that there is a massive drought going on in the Addo Elephant National Park. One of the things that elephants need tusks for is to find water under dry riverbeds, for example, particularly in periods of drought. That becomes a serious problem if you have smaller or no tusks.

We know from climate change that droughts are going to become fiercer, more prolonged, more frequent and so on, but we also see the issue happening with lions. Everyone tends to associate trophy hunting with lions. We have all heard about the Cecil saga and so on. Evolutionary biologists have found that the DNA pool of lions has shrunk by about 15% over the last century because of persecution such as trophy hunting. That means that lions are going to be ever more vulnerable to the diseases and other threats that come about as a result of climate change. Evolutionary biologists are saying that even if just 5% of the good males that are left are taken, that could put the species beyond the point of no return. We would be talking about the first big cat extinction since the sabre-toothed tiger died out in prehistoric times. Unfortunately the US



Government predict that lions may be extinct in the wild by 2050 and that is going to be a difficult conversation for us to have with our grandchildren.

I believe that this is an issue of ethics and civic values and of animal welfare. Sir David Attenborough called trophy hunting “incomprehensible” and about humanity and the “terrible state of the human psyche” not about conservation. In the United States a number of the wildlife agencies have been doing studies into what happens when an animal is shot by a trophy hunter. They found that only in a minority of cases do animals die relatively quickly and relatively painlessly and the majority are subject to a long, painful and distressing death. In the states of Montana and Texas it was over half, in Michigan 58%, Vermont 63% and so on. There is a guide for bear trophy hunters and I mentioned black bears specifically because they are one of the most hunted species. Something like 12,000 to 13,000 black bears are shot every year by trophy hunters. The guide says, “As black bears die, they sometimes moan loudly when air is expelled from their lungs. The sound is not pleasant. Long shot bears will sometimes make gurgling sounds as they expire.” We know, of course, what happened with Cecil the lion. He was shot with a bow and it took about 11 hours before he died. Very recently another lion, Mopane, was killed in exactly the same area, again by a bow hunter, and he took about 24 hours to die.

These are not one-off incidents. This is what happens, partly because the trophy hunting industry encourages people, through awards and prizes, to shoot large animals using different novelty weapons: handguns, revolvers and pistols, muzzleloader rifles, which is an old-style rifle used in the American Civil War, bows and arrows, crossbows and so on. There is an award called the Alternative Methods 24 from Safari Club International. You have to shoot a minimum of 24 species and eight of them have to be by a muzzleloader rifle, eight of them by a handgun and eight of them by a crossbow or a bow and arrow. That, of course, increases the likelihood of pain, of the animal suffering, and often the animals are being shot from a long distance. It is quite common for them to be shot from a distance of 200 metres. That is twice of the length of the Wembley football pitch and trophy hunters, because they don't want to—

Q6 Chair: Sorry to interrupt you but if we ban the trophies will that stop the hunting? What is the situation? What do you believe? What you are telling us is absolutely horrendous and it is very good evidence, but what will the effect be if we ban it or will they just find other markets for it? Will they continue?

Eduardo Goncalves: I think it will discourage it and for a very good reason. Britain is very well placed to take a position of leadership on this issue, partly because it contributed significantly to the development of this industry in the first place. In the 19th century when Britain effectively started the industry in Africa or Asia, 20 million animals were



killed by trophy hunters in that century alone and that has played a large part in the dramatic decline of populations right across the board. There were 20 million African elephants then and there are 400,000 today. There were 1.2 million lions then and now there are just 20,000. There has been a dramatic implication. When the British first went out you could buy a licence for £50 and that would give you the entitlement to shoot as many leopards and lions as you wished; there was no limit. Plus you would get 229 antelopes thrown in, 84 monkeys, 22 zebras and a couple of hippos. British hunters like John Alexander Hunter—who died in the 1960s—singlehandedly shot 600 lions and 1,500 rhinos. Today the total population of rhinos in Africa is 1,300. One individual had a very significant role to play.

I also emphasise the geopolitical point. We in Britain have a very strong relationship with countries like South Africa and with Canada that is the only country that currently still allows polar bear trophy hunting, and of course Australia and New Zealand are—

Chair: Can we leave it there? I am conscious that we have nine questions to go through. I think all your answers are very good but they are a little bit long, so we will try to keep them a bit shorter. I very much take your point that historically we have a debt to repay, basically, and we have to make sure that we lead the way to stop the destruction of these great animals. Putting my farming hat, I can see your argument that by taking out the very best of the species we are weakening the species itself. All of you have presented us with very good evidence but I am going to move on to question 2 and if you wouldn't mind please keep the answers a little bit shorter. I know you want to get everything you can into our evidence but I think you will find that will happen as we go through the questions. At the end I will give you an opportunity to add anything that you have not managed to put in already.

Q7 Mrs Murray: The Government said that the purpose of the Bill is to address biodiversity loss and support conservation of endangered species. Is a ban on the import of trophies from endangered species the best way to achieve this aim? We have heard a lot of evidence from you, so it would be really helpful if you can just address my question.

Dr Delsink: To address the answer simply, a trophy hunting ban is certainly the easiest and one of the lowest hanging fruits. It is one of the best ways in which this can be achieved most quickly. As we have already highlighted, there is a number of threats out there and trophy hunting import is the easiest and quickest way by which they can be eradicated. The UK may not have a huge contribution but it is one of the many and the exponential effect of such a ban would be quite substantial.

There is a plethora of papers that show that trophy hunting can cause conservation issues that are well beyond the target species. It is important to note that this is true for migratory species, herbivores or carnivores, when management decisions that are taken at the incorrect level can cause ripple effects that extend far beyond the target zone or



the species, the region or even the management authority, especially when these decisions are not biologically relevant to the species in question. This can have significant impacts.

Dr Jones: I very much agree with what Audrey said. She has already mentioned and covered some of the evidence that trophy hunting is damaging to species conservation. The question of whether it is the most damaging thing and whether a ban on trophy imports is the most important thing for us to do is a moot question. Trophy hunting has all kinds of impacts that go way beyond the impacts of the particular target animal. For example, far from removing surplus or decrepit animals or those considered to be a threat or a nuisance, trophy hunters typically covet the largest trophies with the most impressive traits. That can have a disproportionate effect on the genetic and social integrity of the family groups or wider populations from which the particular animals are taken and serious adverse effects on the conservation outcomes.

Trophy hunters value rarity and endangered species may be disproportionately targeted, increasing the pressure on already vulnerable populations and potentially pushing them towards localised extinction. There is a study from 2012 that suggested that hunting pressure increases as species become increasingly threatened, leading to what they described as an anthropogenic Allee effect where, because of human-induced changes, disproportionate exploitation of the rarest species can have very harmful consequences. Trophy hunting may not be the biggest threat to a particular species or population but it is a threat that has a disproportionate impact.

Q8 **Mrs Murray:** Can I bring you back to my question? Is a ban on the import of trophies from endangered species the best way to achieve this aim? Do you think it is or do you think it isn't?

Dr Jones: I think a ban is important but banning the import of trophies into the UK will not stop trophy hunting overnight, that is for certain. As we have already discussed, the UK is not among the biggest importers of trophies or the biggest source of trophy hunters in the world. Nevertheless, it will send a very important political message. The Prime Minister has repeatedly said that he wants the UK to be at the forefront of improvements to animal welfare and wildlife and biodiversity conservation and protection. This is a very important political message that the UK can place on the international agenda.

Q9 **Mrs Murray:** Thank you very much, Mark. Eduardo, do you have anything to add or do you agree with what has been said? Do you have anything new to add?

Eduardo Goncalves: Yes. First, Britain is one of the largest importers of elephant trophies of any country in the world. In the last few years over 1,000 elephant trophies have come into Britain plus another 1,000 kilograms of—



Mrs Murray: Do you think a ban on importing of trophies from endangered species is the best way to achieve our aim?

Eduardo Goncalves: Yes, absolutely because it will make a significant impact on the import or the hunting of certain species. As Audrey started by saying, wildlife is under pressure from a number of sources and we need to find a way to take off the pressure in allowing other conservation measures to take root and take effect. This is an easy win. It is low-hanging fruit. It is an entirely unnecessary activity and it would have a very quick impact. For example, when they implemented the moratorium on lion trophy hunting in Zimbabwe in the Hwange National Park the annual survival rates of lions doubled. Previously it was about a 27% to 50% survival rate in any given year and it went up to 80%. They did a before and after study in Zambia. There was a moratorium in a place where there had been trophy hunting and the scientists studied it and found that the numbers of lions doubled in a very short time.

Q10 **Mrs Murray:** Thank you very much, Eduardo. I think you partly answered the second part of my question when you answered the Chairman's question, so I will move on to Mark and then to Audrey. How much of a factor is trophy hunting in the decline of large mammal populations compared to other factors such as habitat loss and human-animal conflict? I will move on to Mark first, because Eduardo mentioned the decline of populations when he answered the Chairman.

Dr Jones: There is a number of threats. Audrey has already alluded to the biodiversity crisis that we face with so many species at risk of extinction. The threats vary between different species and different circumstances. Habitat loss is a massive problem but trophy hunting also represents a significant problem. I have already mentioned the fact that the effects of trophy hunting go way beyond the impact on the specific target animal. This is not just a numbers game in how many animals are removed by trophy hunting, although those numbers can be high and are particularly significant for certain endangered species where trophy hunting may be among the more serious threats to some populations.

I have already said that trophy hunters don't target decrepit or surplus animals. They typically target animals that make good trophies and they are often important animals in the context of the populations from which they come. Trophy hunters also value rarity, so there is a strong market for species that are rare or from populations that are severely endangered. The targeting of individual animals with particular traits can also be very damaging, for example studies of bighorn sheep hunting in Canada.

Q11 **Mrs Murray:** To get back to my question, would you say that trophy hunting is as great a factor in the decline of large mammal populations compared to others like habitat loss or human-animal conflict or would you say it is not as great?



Dr Jones: I think it varies depending on which species and which population you are talking about, but it is certainly a factor and a factor that we are in a position to do something about quickly.

Q12 **Mrs Murray:** Thank you very much. Audrey, do you have anything to add to that, please?

Dr Delsink: Yes, I would like to add that I think we must bear in mind that even though quotas are set, these quotas are often taken into consideration and where they are believed to be biologically sustainable they are found to be unsustainable once the illegal offtake is also considered. They compound the effects of all forms of human-caused mortality. This compounds the problem because we have seen that the offtakes of lions are higher than the scientific recommendation in all countries where lion trophy hunting occurs and 62% of hunting operators found that there were problems associated with trophy hunting of lions in their country and most commonly inappropriate, unscientific or excessive quotas were taken. There is evidence of unsustainable levels, including managed trophy hunting of leopards and lions. In Selous Game Reserve some leopard and lion hunting blocks have quotas of up to four and seven times the sustainable rate for species in these blocks. Trophy hunting would definitely cause a decline in the species. A 2014 study found that the resultant removal of big male elephants—which some would propose are redundant to the population and has absolutely been discredited—demonstrated that these tuskers or trophy hunting appropriate bulls would not longer be found in the population within the next 10 years.

I think the evidence is quite clear that even in the presence of these so-called biologically sustainable quotas it causes a massive loss and these are just exacerbated by the other threats that are there.

Q13 **Mrs Murray:** Thank you very much. Mark, do you want to briefly add anything to what you said to the Chairman in your reply to question 1?

Eduardo Goncalves: Yes, very quickly. We often talk about poaching being a driving threat. Let's look at elephant poaching. We talk about it but between 2001 and 2015 80,000 elephants were shot by trophy hunters. The current estimated population of elephants is 400,000, so a fifth of the elephant population has been shot by trophy hunters and it is the same for rhinos. We talk about poaching being the dominant threat but in some years more rhinos have been shot by trophy hunters than by poachers. Between 2007 and 2017 4,000 white rhinos were shot. The current population for white rhinos—

Q14 **Mrs Murray:** Sticking to the question, do you think trophy hunting is contributory to the decline of large mammals compared to other factors? Is trophy hunting a greater factor or is it a lesser factor when you compare it to things such as habitat loss and human-animal conflict?

Eduardo Goncalves: It varies depending on the species and the place but it is certainly a driving factor and in some cases the dominant factor.



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It is interesting to look at the case study of Kenya where they banned trophy hunting in 1977. While lion, rhino and elephant populations have been falling throughout the rest of Africa, in recent years lion populations have gone up 25% in Kenya.

Mrs Murray: Thank you, witnesses. I appreciate that but, Chairman, I am aware that we are quite short of time, so I will pass back to you.

Chair: You are great witnesses but try to keep the answers a little bit shorter if you can, please.

Q15 **Dave Doogan:** Thanks to our witnesses. These are quite brief questions and they need only brief answers. Why is CITES not effective enough as a mechanism to protect endangered species?

Dr Jones: The national wildlife trade regulations implement CITES in the UK and do not address the moral or ethical objections to trophy hunting or its impact on animal welfare, which I believe are probably the main causes of concern to the public when they are asked about trophy hunting. However, it is our belief that the regulations do not even effectively address what they are designed to ensure, which is the biological sustainability of the activity.

The wildlife trade regulations, which have been transposed into UK law from EU regulations and implement CITES in the UK, include a number of measures that go beyond CITES requirements. For most products they require import permits to be issued for all annexe A and annexe B specimens, placing an obligation on the UK authorities to establish to their own satisfaction that the specimens have been legally acquired in the country of origin and that the trade in them is not detrimental to the populations from which the specimens are derived. However, trophies from all but six annexe B species are excluded from this requirement for no clear logical reason. For example, giraffe trophies, which is an annexe B listed species, can enter the UK without any assessment by the UK authorities of whether they are legally acquired or there may be conservation impacts to consider.

Where oversight is required by the UK authorities, it is argued that the authorities will all too often accept trophies obtained under CITES quotas and the documentation provided by the source country, which may or may not be scientifically sound. CITES quotas for trophy exports are frequently not based on robust scientific information for some very key species. To give an example—

Dave Doogan: If you just hold the example, Mark, because I want to hear from Eduardo and Audrey on the same point.

Eduardo Goncalves: The issue here is that we have banned the trafficking of trophies but we have not banned the killing of endangered animals for trophies. We have a bizarre situation where local people can't kill endangered animals for food, for bush meat, even if they are desperate but a foreigner can come in and shoot the exact same animal



just for entertainment. Of course, that increases problems of resentment. It also does not give us a true picture of what is happening with trophy hunting. We know that something like 350,000 trophies of CITES-listed species have been traded over the past decade but the total number of animals that have been traded as trophies over the same period is somewhere between 1 million to 1.7 million. That gives us only a fraction of the picture.

Clearly it is not being applied in a way that is beneficial for conservation. For example, appendix I species in CITES are supposedly the most endangered animals and CITES says at article II, paragraph 1, that these species cannot be traded unless there are "exceptional circumstances". Yet the reality is that the permits to import and export leopard trophies, for example, are handed out in an almost routine fashion. The system is open to all sorts of exploitation and has been by wildlife traffickers. One trafficker, Chun Leong Lim Fai, over a period of seven years was able to traffic \$300 million worth of white rhino horns into the black market but using legal CITES permits. The system clearly is not working but also it was not necessarily meant to because it is a trade treaty not a conservation one.

Q16 **Dave Doogan:** Audrey, do you want to add anything to that?

Dr Delsink: Nothing more. My peers have done a fantastic job. I would like to say that the example of the giraffe is very critical because it highlights that this treaty is there supposedly to protect species, but in fact it allows species to fall through the cracks because it exposes how a system of checks and balances is broken, specifically when reservations are at play. The system is not fool-proof and it does not serve to protect the species as it should.

Q17 **Dave Doogan:** Sticking with that, CITES recognises the commercial relationship between hunting and local communities. If a ban was introduced and that put a dent in the level of trophy hunting that took place, how could we be confident that that would have a detrimental effect on local communities?

Dr Delsink: I think it is imperative to understand that often trophy hunting is conflated with other issues such as a country's food security and poverty. It is important that wildlife should not be used as a Band-Aid for social and political problems. Also when we refer to income we need to be transparent about at what level and to whom we are referring at this level. Trophy hunting is not the be-all and end-all. There are alternatives. We need to provide solutions that are more sustainable and resilient and that provide equitable systems. Those necessary conversations will not happen as long as trophy hunting continues.

Irrespective of whether CITES includes this or not, we should be investing in alternatives, and real-world, real-time alternatives exist and are happening now. For example, we have debt-for-nature schemes, we have carbon and biodiversity credits for conserving habitats. These are



referred to as reducing emissions from deforestation and forest degradation schemes—REDD+ mechanisms—that have been introduced by the United Nations framework convention on climate change. These are climate mitigation strategies but they encourage developing economies to lower their carbon emissions through a variety of habitat management schemes such as conservation farming and they are proposed by local communities and supported by carbon finance, which is donor funded. This is a stream of revenue that is paid directly to the communities living near the forest or the savannah environment or the wildlife protected area. These are, for example, Kariba REDD in northern Zimbabwe and Chyulu Hills REDD that is close to Kenya. Chyulu Hills is 100% owned and managed by local institutions. It protects 1 million acres of land, conserves three national parks and helps in excess of 70,000 Maasai people.

We also have sustainable enterprise development programmes, which include the Maasai Wilderness Conservation Trust that initiates self-sustaining employment among Maasai women, including beekeeping and beading. In partnership with the Kuku community it cultivates and sells grass and grass seeds. The benefit of this is that it provides income for women from the sale of grass and grass seeds, provides additional livestock forage and takes pressure off grasses for wildlife and improves water tables and botanical restorations. In 2019, for example, 13 women's groups were supported, 2,000 kilograms of grass seed were harvested. The list goes on, for example the granting of community land titles with conservation compatible agriculture schemes or community conservancies. In South Africa we have a former trophy hunted concession areas that has now been successfully reclaimed by a community.

Q18 Dave Doogan: Audrey, I am going to stop you there. Quick answers to this final question from me, please, if you could. There is clearly a lot of money in this industry. What is the empirical evidence to demonstrate how much of that money rests and is retained in local communities where this trade is carried out?

Eduardo Goncalves: We interviewed a number of community leaders, members of parliaments, local councillors, village headmen and so on in African countries to find out what they said. They told us things such as, "We are not getting any benefits from trophy hunting or animals being killed. The money does not reach the people. We have remained poor." Trophy hunting is not serving the stated purpose of uplifting the community. The community gets 0% despite the fact that governments continue trophy hunting and claim it benefits the community.

Chair: I think we are going to largely cover this in question 4. Mark, can you make a comment, please, and then I think, if it is all right with you, Dave, we will move on to question 4.

Dave Doogan: Yes, of course.



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Dr Jones: I think my colleagues have covered well some of the alternatives that are available in other community benefits. In these times of the biodiversity crisis—and we have all heard about the biodiversity crisis; I am sure we are cognisant of that—with so many species facing decline and extinction, we have to do better than relying on a strategy that allows wealthy, predominantly western trophy hunters to pay to kill increasingly rare animals and provides at best meagre handouts to local people, wildlife conservation and protection programmes.

As Audrey has pointed out, there are many alternative, much more effective ways of funding conservation and local community development through responsible payments through consistent services, debt-for-nature schemes, linking development aid to wildlife protection and so on. Ecotourism can, of course, play a big part where it is feasible and can be responsibly managed, as can the use of carbon markets, for example, to realise the value of the ecological contribution of animals such as elephants when they are allowed to live out their lives and carry out their business in their natural habitats.

I will stop there to keep it brief, but the financial contribution that trophy hunting makes to local communities is vastly overstated by trophy hunting proponents and there are many much more effective ways of providing that kind of funding and development without relying on rich westerners going over and killing animals for fun.

Chair: Thank you much. Derek is now going to take question 7, because I think we have covered most of question 4. I am going to hand over to Robbie for question 5. You are all giving us really good evidence but if you could keep your answers a little bit shorter because we will cover a lot of what you are saying in all the questions, if you see what I mean. I know you are desperate to get everything in on every question, and I very much respect that, but try to be a bit quicker because otherwise we will run out of time.

Q19 **Robbie Moore:** Thank you so far, witnesses. My question is picking up on the points to do with tourism and alternative measures to trophy hunting. We have been told that tourism is not a credible alternative to trophy hunting. Could you give your response to that statement that this Committee has been told?

Dr Delsink: I find that allegation quite difficult to swallow because there are numerous economic studies that examine trophy hunting in eight African countries. They demonstrated that trophy hunting in these countries generated \$132 million a year, which was 5.78% or less in overall tourism spending in those particular countries. The total economic contribution of trophy hunters was at most about 0.03% of GDP. In comparison, overall tourism accounted for between 2.8% and 0.1% of the GDP in those same countries. Furthermore, non-engagement with wildlife such as photo-tourism can be far more lucrative. While a trophy hunter may pay, say, \$40,000 to shoot a bull elephant, a living elephant



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would generate \$23,000 annually through photo-tourism, meaning that this elephant raises a potential value of \$1.6 million over its lifespan. I think tourism and the effects thereof are far greater than what a single trophy hunter can bring to the table.

Q20 Robbie Moore: Sorry, to cut you off there, Audrey. Thank you very much because you nicely came on to my next question just to expand on that point. Do you have examples of communities that have successfully replaced trophy hunting with photo-tourism? Could you expand on that point and give a worked example?

Dr Delsink: Absolutely. I was trying to lead into that alternative earlier but in the interests of time I cut myself short. In South Africa we have an example where a community-owned reserve explored trophy hunting as its main form of income and has handed it over to a company called MCP Holdings and it now expressly uses ecotourism as its main source of income. It has gone down that road and now made the shift. A myriad of examples exist and I think the point is that there are examples out there so they need to be explored and the resources need to be funnelled through them because they can work. They need to be exemplified.

Q21 Robbie Moore: Thank you very much. Eduardo, I will come to you and ask the same questions. Could you comment on the Committee being told that effectively tourism is not a credible alternative for trophy hunting? Expanding on that, do you have examples where photo-tourism has successfully replaced trophy hunting?

Eduardo Goncalves: This is a slightly unusual claim and there is not really any evidence for it. There is plenty of evidence for the opposite happening. For example, a well known Tanzanian company—I think it is Tanzania Game Trackers Safaris—has dropped trophy hunting and has rebranded itself as Legendary Explorers, if memory serves me right, that is doing nature tourism, photographic tourism. There is a number of hunting companies that are diversifying into photographic tourism, because I think they recognise that the winds are changing but also they recognise that it is much more profitable.

Botswana banned trophy hunting in 2014, but even before it did that there were a number of places in the Okavango Delta, for example, that were switching away from that to photographic tourism because it was creating many more jobs that way. We don't need to look at just Africa for examples. In Canada, the town of Churchill is a place where thousands of people come to watch the polar bears and that one town generates five times as much income for local people from photographic tourism than the entire polar bear trophy hunting industry. This is a pattern that you see everywhere. The example of Kenya was mentioned. Photographic tourism there is now worth \$1 billion a year, which is five times as much as the entire trophy hunting industry in Africa.

Q22 Robbie Moore: Thank you very much for that. Those are two very good examples. Mark, the same questions to you.



Dr Jones: I think my colleagues have given some good examples of the relative values. Tourism in general is hugely valuable all over the world, obviously, and particularly in Africa. Wildlife tourism, ecotourism, makes up a very significant proportion of the total income and jobs created and so on through tourism in Africa. The revenue generated from trophy hunting, which is hard to assess accurately, is variously estimated as being between US\$200 million and US\$400 million per year, which is tiny by comparison, but that is not the complete analysis. It is also important to consider how much of that money trickles down to local communities or to conservation authorities or parks authorities. Again that is a very hard figure to pin down, but a study conducted by Economists at Large, in their landmark report a short number of years ago, that looked at a number of African countries estimated that it could be as little as 3%.

When you take that into account, the actual amount of money that is available from trophy hunting to provide funding for local communities and wildlife conservation is very small indeed. It is also worth saying that trophy hunting may prevent or disincentivise more lucrative forms of nature tourism and prevent them from maximising their potential contribution to local economies. You have to remember that income from trophy hunting represents a tiny fraction of the wider tourism sector with little scope for sustained future growth. Even a small negative effect on the wider tourism sector would completely undermine any economic contribution from trophy hunting. Wildlife ecotourism is a vital income source across Africa and it is our belief that when it is properly managed it can provide far greater benefits to local communities than can trophy hunting.

Robbie Moore: Thank you very much. There were some great examples there and also linking it back down to the positive impact it can have directly on communities, Mark.

Chair: Thank you very much. It is interesting, \$1 billion in Kenya for future photo-tourism. That is an amazing figure and something for our records and our inquiry. I will hand over to Sheryll on question 6 about the so-called canned hunting.

Q23 **Mrs Murray:** Witnesses, I want to turn to the matter of canned hunting. Again, please keep your answers as succinct as possible and I will be brief with my questions. Should the Bill contain a specific ban on trophies from canned hunting?

Eduardo Goncalves: The answer is that absolutely it should, not least as this is one of the few areas where there is complete consensus even among the mainstream trophy hunting industry. I was very fortunate to be invited to the roundtable that the former Secretary of State Michael Gove organised in May 2019. He went around the table at the end of that meeting—and there were representatives from Safari Club International and CIC, which is another international hunting group—and said, “What would you think should Britain implement a total ban on canned lion



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imports?" and everyone, including the hunting industry representatives, said yes.

Dr Jones: Yes, I absolutely agree with that. The breeding of lions and other predators in captivity, which mainly occurs in South Africa, for activities such as cub petting, adolescent lion walking, the hunting of mature captive-bred animals in so-called canned hunts and the slaughter of these animals to provide bones and derivatives for international trade, have no conservation value whatsoever and are associated with serious animal welfare concerns and can stimulate trade that in turn can incentivise poaching. That needs to be included.

Q24 **Mrs Murray:** Thank you very much. Audrey, briefly, do you agree with the other two panellists?

Dr Delsink: Absolutely. As a South African, I am ashamed to say that South Africa is the poster country for canned breeding and it is an absolute stain on our country and our reputation. There is zero conservation benefit whatsoever and this is supported by our own Minister of Environment who has called for an end to captive lion breeding and all its associated spinoff activities.

Q25 **Mrs Murray:** Thank you very much. The second part of my question, and if you could be as brief as possible again: how could a ban on trophies from canned hunting be put into practice?

Dr Delsink: I suggest that the ban has to be as inclusive as possible because it is impossible to differentiate captive or canned breeding specimens from wild specimens. It would create tremendous enforcement problems and be impossible to do. An all-inclusive ban would eradicate these problems and send out a strong message that it is not acceptable. It would limit the market for such activities and bolster activities in our own country to shut this industry down once and for all.

Dr Jones: As Audrey said, including the species that are typically captive bred for canned hunting in the import ban would cover this issue. In our view, all of those species should be included in that ban. The other way that this was done to some extent through the Endangered Species Act in the US was through the conservation benefit requirement. We argue there is no conservation benefit from trophy hunting but there is quite clearly—and I think there is broad agreement on this, as Eduardo has said—absolutely no conservation value at all from canned hunting.

Q26 **Mrs Murray:** Eduardo, you have the final brief word this time. Do you have anything in addition to add to what has been said before?

Eduardo Goncalves: I have two things. One is that canned hunting is not just lions. It is also tigers, leopards, big cats and other species. The second is that this could be done overnight at the stroke of a ministerial pen. That is effectively what happened in the Netherlands when they banned the import of 200 trophies. France and Australia did it very quickly with canned lions also.



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Q27 **Chair:** Audrey, how big is the extent of breeding animals in captivity to then hunt in South Africa at the moment? You said you are very upset with the situation there. What is the situation in South Africa and beyond, please?

Dr Delsink: The situation in South Africa is that we currently have four times more lions in captivity than we do in the wild. There are approximately 10,000 to 12,000 lions sitting in abhorrent conditions, fraught with welfare concerns.

I would also like to highlight something that Eduardo mentioned. Captive hunting is often associated with lions and other big cats, particularly in South Africa as tigers are exempt as they are considered exotic. South Africa is also infamous for other captive breeding operations and that is that we intensively breed other species and even resort to genetic manipulation to produce unnatural and rare colour variants of species, such as golden wildebeest or black impala. We should not discount those particular types of species because they too are selective bred, then they are sold, transported, other processed and delivered to a property where they are hunted and shot in these manipulated conditions.

Q28 **Chair:** In South Africa they are allowed to breed these species; they are allowed to breed all this. Are there any controls over it at all? Are you hoping there will be? You said the Minister was talking about it now. What is the situation?

Dr Delsink: The Minister has expressly condemned the issue of captive-lion breeding in her draft policy position paper. There has been a specific call for the revision of intensive farming conditions of these other species. However, this is a draft policy position paper, it is undergoing public review and public participation at this stage, so these species and these policies remain in limbo at this current stage. These animals continue to be bred under these conditions until policy changes and until the law changes. South Africa is extremely complex as we essentially have nine provinces, each with its own provincial ordinances and there is no national standard. This poses additional problems and the system is fraught with problems. It is a huge problem.

Chair: Thank you for that evidence. It sounds as if it changes across the different provinces of South Africa. I will bring in Derek Thomas on what the Bill will mean for the UK.

Q29 **Derek Thomas:** Eduardo, in your campaign about this Bill, have you given much thought to what it would mean for hunting in the UK?

Eduardo Goncalves: No, because largely it is a non-issue to all intents and purposes. I was looking at the data of trophy exports from Britain since 2019 when the Government first announced the proposition in the Queen's speech and then in the election manifesto. Since 2019 there is just one trophy on the CITES trade database that has been exported from Britain since then. It was of a tiger skin that was pre CITES; in other words it was shot long before CITES came into force.



As far as I am concerned the issue of trophy exports from Britain is to all intents and purposes a non-issue. What is an issue is the considerable number of trophies being brought back every year from right around the world, many of them of endangered species. That is where I believe the focus of the legislation should be.

Q30 **Derek Thomas:** There is no need or requirement to ban trophy exports from the UK?

Eduardo Goncalves: I don't see it as a priority because we are talking about something that is absolutely minuscule in scale.

Derek Thomas: Thank you very much, that is the entirety of my question.

Chair: Mark, would you like to add anything?

Dr Jones: We do not have the legislation in front of us so we don't know whether it will cover just imports or imports and exports, or which species may or may not be included in the legislation. Notwithstanding our ethical objection to all forms of killing for sport, a ban on imports would not have any impact on hunting in the UK. Even a ban on exports from threatened species will not affect the hunting of, for instance, red, roe or fallow deer or most game bird species. In any event, even a comprehensive trophy import or export ban would not prevent people hunting deer or game birds in the UK per se. It would only prevent them exporting the body parts as trophies and, perhaps apart from a small number of deer trophies that are exported each year, the numbers are tiny.

We do believe that there should be an equivalent export ban but notwithstanding our ethical objection to many forms of hunting in the UK for sport, we don't believe it will have a significant impact.

Q31 **Dave Doogan:** I want to pick up on a comment from Eduardo. Could you elaborate on the nature of the fundamental difference in the hunting that takes place in the United Kingdom, much of which takes place in my constituency where it is hunting of game birds and of deer? How would you avoid the charge of hypocrisy?

Eduardo Goncalves: The main issue is around the scale of it. What we are talking about is primarily mammals and we are talking about primarily mammals that are in some ways endangered. They sit somewhere on the IUCN red list or somewhere in the CITES appendices, and indeed somewhere on the EU Wildlife Trade Regulations, annexes A, B, C, D and so on.

Essentially we are not talking about a large scale industry in the UK. Certainly, for example, if you look at southern Africa or indeed North America the numbers are absolutely huge and that is why people are going to those countries and bringing trophies back. Very, very few



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people are coming to Britain to shoot animals for sport and for trophies to take back home to America or to Germany. It is not the priority issue.

Frankly, this is an issue that has gone on for too long. We have been waiting since 2015 for the Government to act against lion trophies. They have promised three times to do so and have not. Now they have promised three times to act on trophy imports of endangered species, in three Queen's speeches, and manifesto pledges and we are still awaiting for legislation. I think the Government are perhaps overthinking, possibly even overcomplicating, matters a little.

In the Netherlands this was something that was done at the stroke of a ministerial pen and they managed to stop the import of trophies of 200 species. I think that should be the emphasis.

Q32 **Dave Doogan:** Do you see it as relevant, Eduardo, that the hunting that predominantly goes on in the UK is concerned with the production of food from wild animals?

Eduardo Goncalves: That is the fundamental difference and that is why, for example, trophy hunting is not something that is conducted by Africans or by Inuit populations in Canada where trophy hunting of polar bears goes on and so on. It is absolutely not to meet any kind of human demand or need. It does not feed us, it does not clothe us, it does not provide us with fuel, it is purely for the pride, for the vanity and for something to show off in your living room. That is the fundamental difference.

Q33 **Dr Hudson:** Thank you to our witnesses for being before us today. I want to move on to the parts of the Bill that potentially are going to look at low animal welfare experiences and the advertising therein. DEFRA has explained that the Bill will give Ministers delegated powers to ban the advertising and offering for sale here of any animal experience abroad that is considered to involve the unacceptable treatment of animals.

Mark, what impact will there be on a potential ban of the advertising of low animal-welfare experiences?

Dr Jones: The proposed ban on advertising and offering the sale of overseas attractions, activities or experiences that involve unacceptable treatment of animals will serve a number of purposes.

It will help to inform and educate travellers from the UK about such unacceptable practices and hopefully disincentivise them from engaging in those activities. It will help to reduce impulse bookings by travellers who have not planned to do such activities and may not be aware of the unacceptable practices and animal welfare implications involved. By doing this it will reduce demand for such activities among British tourists, which in turn will help to reduce the profitability of those activities.

It will also send clear a message to legislators, policymakers, tourism attraction owners and others overseas that the UK Government



discourage such activities and practices, which in turn we hope will help to disincentivise them. We very much advocate for such a ban to cover, as a minimum, those activities that would be illegal in the UK, for example under the Animal Welfare Act.

Q34 Dr Hudson: I will get on the criteria in a second, Mark. That is the next part of my question which is about how we judge the experiences that come into that. Audrey, do you have anything to add on that what you think an impact of this potential advertising ban would have?

Dr Delsink: Thank you for asking me because from a South African perspective I would add that this Bill would be very much supported. First of all, as we know, this is a very complex issue and I have already highlighted the atrocities that are associated with South Africa's captive lion breeding issue. I would also like to add, though, that it also pertains to elephants and dolphins, which are highly intelligent and cognitive species, and point out that papers published as of this year demonstrate that these animals, when subject to captivity, physically endure damage to their brains; neurological side effects from a lack of activity.

As a result, the Southern African Tourism Services Association, SATSA, initiated a rigorous process and developed a long-term vision for South Africa's own tourism industry regarding animal interactions in tourism. They formed the framework that guided attractions, operators and tourist through a guideline, which comes as a downloadable tool that explored the intricacies of animal interactions, looking at the reason why they are in captivity, the source of the animals, the use of animals and the likely destination of these animals.

What this means is the proposed ban on advertising and offering for these activities overseas would be completely consistent with SATSA's vision and would absolutely support the industry's aim of promoting responsible tourism. It will help to raise awareness among the public of the cruel nature of these activities and practices and it would also lead to an overall reduction in supply. I think it is a fantastic initiative and will be well supported by the industry, as evidenced by SATSA.

Eduardo Goncalves: I would like to add something. From the UK you can access website that sell trophy hunting holidays, as if you were doing your shopping at Tesco online, for example, bookyourhunts.com. There are currently 5,000 trophy hunting holidays for sale there covering 350 different species. As well as giraffes and cheetahs, you can also hunt monkeys and wildcats and seals, even reindeer, ironic given we are coming into the Christmas season.

We should be thinking at least about filters and parental consent in order to protect our children from some of this.

Q35 Dr Hudson: Thank you, that is very helpful. Sorry I cut you off, Mark, when you were going through some of the criteria. The Bill defines a low animal welfare experience as an activity that would be banned under the



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Animal Welfare Act of 2006, if they existed here. Do you think that approach is the most effective way of doing this, bringing in this advertising ban?

Dr Jones: We would certainly advocate for such a ban to as a minimum, cover those activities that would be illegal in the UK under the Animal Welfare Act 2006, or would require a specific licence in the UK under the activities involving animals regulations. We would absolutely advocate for such a ban to include some of the high profile activities that are much talked about in this respect, such as elephant riding, inappropriate animal handling for photo opportunities, walking with big cats, that kind of thing.

Q36 **Dr Hudson:** It would be helpful for the record in answering this question to list some of the experiences that the three of you feel should be included in this. That would be useful for the record. Mark, you are talking about elephants as well as other things. What are the other experiences are you particularly thinking about?

Dr Jones: As a member organisation of the Dolphinarium-Free Europe Coalition we fully endorse its stated support for the inclusion in the ban on advertising or offering for sale swimming with dolphins and other activities at facilities that maintain cetaceans and other marine mammals in captivity. The continued advertising of these kinds of activities creates and sustains a market for the captive cetacean industry in spite of the irrefutable scientific evidence highlighting the welfare harms associated with the keeping of marine mammals in captivity.

Q37 **Dr Hudson:** Are you specifically talking about the interactions with marine mammals? What about observing them? Are you talking about when people get in the water with the dolphins, that side of things? What are you talking about?

Dr Jones: It is both. It is the visiting of dolphinarium and other facilities that display marine mammals and make them do tricks or shows or whatever. Also those that advertise close interactions between the public and the animal.

Q38 **Dr Hudson:** Audrey, do you think the definitions, using the 2006 Act, would be a sensible approach? What sort of experiences would you be thinking about with your African experience potentially?

Dr Delsink: That would be a good starting point. Obviously we would not condone anything that would undermine an animal's welfare. I would expand it to include a range of activities, including performing on a horse, that includes tactile interactions with all infant animals, predators and cetaceans. What is very famous in South Africa is walking-with-animal experiences, walking with predators or elephants. You may not necessarily be physically touching them but you have the experience of walking with them. Also the riding of wild animals, whether it be elephants, ostriches or crocodiles. People are extremely creative in how they choose to exploit animals. This should be very broadly expanded. That is the minimum at which it should be started.



Eduardo Goncalves: I will limit my remarks to trophy hunting.

Q39 **Dr Hudson:** Okay, the final part of question—and I think I know the answer from all three of you—should an advertising ban be extended to trophy hunting as well? I think I know the answer.

Eduardo Goncalves: Absolutely, in relation to the advertising through websites such as bookyourhunt.com, which is a site that does this at the moment and also advertising things like walking-with-lions holiday experiences and cub petting, because many of those animals have been bred for the trophy hunting industry. They will start out their lives making money for operators in this way and then when they are a little bit bigger and older they will end up in these pens and enclosures.

Dr Delsink: Absolutely, because, as Eduardo pointed out, there is a direct link between these captive breeding facilities and trophy hunting. They will either end up as a trophy or as a bag of bones ultimately. People are not aware of this and need to be made so.

Q40 **Dr Hudson:** A final question to you, Mark. You started off trying to define—and I cut you off—the criteria for the advertising ban. Do you think the Government needs to be very explicit when looking at it, looking back to this 2006 Bill but defining which species they are talking about as well in terms of endangered species, domesticated species, that side of things? Animal welfare is a big area. How do legislators tone it down to have pragmatic, sensible legislation that works?

Dr Jones: I am not sure it is something that we would encourage to be viewed as a by-species issue with respect to endangered species and whatever; this is primarily an animal welfare issue. As a fellow veterinarian, the welfare implications of these activities, trophy hunting and some of the other activities that we mentioned, are of great concern to me.

The ban will go some way to fulfilling the Prime Minister's stated ambition to promote the welfare of animals and the Secretary of State's commitment in DEFRA's action plan for animal welfare to solidify and enhance our position as global leaders in this field by promoting high animal welfare standards across the world. We have to view this particular part of the Bill as something that will highlight, hopefully reduce and ultimately eliminate, low welfare practice when it comes to whichever species happens to be involved. As we all know, the animal welfare implications for an individual animal of a particular form of exploitation do not depend on the animal's conservation status.

Q41 **Dr Hudson:** You mentioned the rearing of animals and the feeding of young animals as being one of these experiences but in this country and in many countries around the world we have many high animal-welfare experiences where young children go on to farms and feed lambs and so on. That is a very good educational experience and the animals are kept in good welfare conditions. We are very keen on that in this country; it



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shows people how the farming world works and allows young people to appreciate the animal world in that sense.

With your veterinarian hat on, and thinking about the UK experiences—obviously the low animal-welfare experiences that we are talking about for the Bill are very different—there is a bit of a dissonance there, isn't there? It is okay to do it with a lamb but not okay to do it with another species?

Dr Jones: I understand your question. We have been primarily talking about the exploitation of what are ostensibly wild animals, whether or not they happen to have been bred in captivity. What you are talking about here are animals that have been domesticated for perhaps hundreds or thousands of years and are routinely handled and so on.

I did mention at the beginning that I thought that we should not only apply this ban to activities that would be illegal under the Animal Welfare Act but we should capture any activity for any species, whether wild or domesticated, that was being mistreated and that would fall foul of that Act but also activities that would require a licence in the UK. Again, notwithstanding some of the issues we have with some of the licences that might be issued, at the very least the requirement for a licence suggests that there are criteria that must be met in order to satisfy, among other things, certain animal welfare concerns. At the very least I think it would be perfectly reasonable for the UK Government to ban activities overseas that would require a licence in the UK because we cannot guarantee that those same criteria are being met.

Dr Hudson: Thank you, that is very helpful.

Q42 **Derek Thomas:** I share your frustration about how long this is taking, given the Government have made lots of noise about it. When this ban is in an Act, that alone will stop a lot of illegal trophy-hunting but do you have suggestions about how you would enforce a ban for those who want to break the law?

Dr Jones: Obviously most instances of trophy hunting may not be illegal at the moment in the country in which they take place, notwithstanding the fact we might wish them to be illegal. The easiest way to facilitate enforcement on a ban of trophy imports is to make the rules very simple and very clear for the enforcement authorities. A comprehensive ban on trophy imports provides this.

Audrey has already mentioned the difficulties in discerning between what might be a trophy that was obtained from a wild animal as opposed to a trophy that was obtained from the same species that had been bred in captivity. A comprehensive ban on trophy imports would cover both. That makes it much easier for the enforcement authority and such a ban would also reduce the costs of enforcement, I think.

If the scope of the proposed ban is to be restricted to certain species that might be on the Wildlife Trade Regulation annexes or the red list of the



IUCN or whatever, then existing enforcement mechanisms that are already designed to facilitate detection and identification of species in illegal trade should apply. In theory those mechanisms should already be available to British enforcement authorities.

Q43 Derek Thomas: I may have misunderstood the question. I think it was more about advertising; that was my fault. What kind of penalties do you think are going to be significant enough to stop advertising and the importing of illegal trophies?

Chair: Eduardo, what should we do? Lock everybody up? Seriously, we have to have a penalty that is going to stick, don't we? There is no good bringing in legislation if we cannot enforce it.

Eduardo Goncalves: That is absolutely right, it has to be something with punitive measures that act as a deterrent and also reflects public opinion's position on this. One position to adopt would be existing legislation that allows for punitive measures of up to seven years in prison for trading in a CITES listed species without a permit. There we can borrow, if you like, an existing punitive framework and could also look at the Animal Welfare (Sentencing) Act perhaps as well.

I do think the key to this is about making this as simple as possible and therefore a comprehensive ban rather than an endangered one. I pity any British border or customs official trying to tell the difference between, say, a Hartmann's zebra skin, which is vulnerable and may be covered, and that of a Burchell's zebra, which is more plentiful and therefore may not be covered. That is going to be the key issue. It is going to be very difficult if we just have CITES appendix 1 species, for example, lions in some places are appendix 1; in some places they are appendix 2. The same happens with elephants. Some species are missed off lists altogether. Giraffes were completely forgotten by CITES until 2019. Also species are getting more endangered very quickly. Leopards were less concerning in 2002; now we know they are in very serious danger, giraffes ditto. Until last year elephants were classed as vulnerable; they are now classed as endangered. If the legislation had been brought in 2019 or 2020 using just an endangered classification, the law would already be out of date.

Q44 Derek Thomas: The Association of British Tourist Agents has guidance already about how they work in areas of low animal welfare. Do you think there are lessons we can learn from that when we apply the ban on advertising trophy hunting? You have all indicated that there are already penalties there so we can apply them. Is there any guidance that also already applies that could be easily adopted in this area?

Dr Jones: I would be happy to try to answer that. The Government need to work with animal welfare experts—

Chair: I think Audrey has had a power cut that is why she is not with us. Hopefully she might get back. Carry on, Mark.



Dr Jones: Yes, the Government needs to work with animal welfare experts and organisations, along with relevant tourism and travel companies and organisations to develop a widely promoted code of practice supported by legislation that clearly defines and identifies unacceptable practices and provides clear guidance to travel operators, advertisers, the general public and other stakeholders on what should and should not be considered acceptable, and what this means in respect of advertising and promotion.

As you mentioned, ABTA has already developed a set of guidelines for its members concerning what might be considered acceptable or unacceptable practices involving animals in tourism activities. That was developed in consultation with a range of NGOs, academics, industry and so on. The implementation of these guidelines is voluntary and they may need further improvement—they are a few years old now—to reflect current thinking.

Yes, there needs to be wide consultation. The Advertising Standards Agency may also have a role in examining associated advertising and investigating complaints.

Q45 **Derek Thomas:** While we agree with that, we would not want to delay it any longer. Eduardo, do you have any comment on that?

Eduardo Goncalves: The only thing I would add to that is that the freight-forwarding industry should also be brought into this process because they are the shippers of hunting trophies and they need to be either educated or consulted in how this is implemented.

There is one little anomaly in the law that we need to think about as well. That is the transshipment of trophies, for example, from South Africa to the US where they may actually come into the UK. They may be in Heathrow for a while but they will be airside, so are they covered or are they not covered by the legislation. It is a detail that should be examined.

Q46 **Chair:** Thank you. On that one about them being in Heathrow, this is when they are passing through. Is there any way we can include in legislation that they cannot transport trophies through the United Kingdom? It is an interesting point. We can possibly try to add it to the legislation but I do not know if we can make stick. What is your view on that, Eduardo?

Eduardo Goncalves: I know that the British freight-forwarding industry has a view. They do want to collaborate in making this law effective and enforceable. I think they should be spoken to. They understand the legislation regarding what is on UK territory at any given time better than I do and they have made some very valid points in the consultations we have been having.

Q47 **Dr Hudson:** A quick question, just to come back to the definitions of these animal welfare experiences.



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Mark, I am concerned that this Bill we have good intentions to try to stamp out some of these low animal-welfare practices abroad, potentially that tourists are perhaps going to in ignorance and being promoted to go to, but then there are other experiences with animals around the world, and in this country as well, and I would hate to see unintended consequences come from this Bill. I am thinking about wildlife rescue centres in countries and that potentially the footfall from tourists coming and visiting those rescue centres and the money that would generate would be a good thing for conservation and wildlife protection. How do we draw the line between those well-intentioned animal experiences where tourist can interact with that wildlife and these other practices that you have touched on that are much more clear cut? There is a spectrum so how do we define what is low animal-welfare? Some centres are going to be doing high animal-welfare and conservation work, both in this country and abroad.

Dr Jones: Yes, again, I take your point. The Government need to work with animal welfare experts, relevant tourism and travel operators and so on to clearly identify what we mean by low animal welfare experiences.

On rescue centres and sanctuaries, I think it is fair to say that the responsible ones, while they may allow visitors to view some of the animals, would not be involved in the business of advertising or making money from close human/animal interactions of any kind. There is a line to be drawn in the sand there between what a true sanctuary or rescue centre might undertake in terms of public access to view animals and what we are talking about here.

Q48 **Dr Hudson:** I take your point, it is not that interactive but the public could come and view the animals and make a good donation to that wildlife rescue centre as part of their visit, could they not?

Dr Jones: I think it has to be very carefully managed. Such opportunities do provide income for some sanctuaries and rescue centres but it needs to be very carefully managed. There are some very good guidelines by the Global Federation of Animal Sanctuaries. I have worked in animal sanctuaries and wildlife rescues centres that do allow visitors and those visitors do give donations. You are right to flag this but I think there is a very big gulf between what we are talking about now, which is clearly exploitative animal activities that usually involve very close contact between the public and the animals, and responsible sanctuaries and rescue centres that may allow people to view some of the animals that they hold.

Dr Hudson: Thank you, that is a helpful take-home message to Government to clearly consult with the specialists in the sector so that they get it right in drawing up the legislation. Thank you.

Q49 **Chair:** Audrey, I see you are back. Thank you very much for rejoining us. The last question we were talking about was how practical is it to enforce a ban. Would it work? Who would enforce it and what would be the



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penalties for a breach? What are your view on that?

Dr Delsink: Thank you. My apologies, these are mandated power cuts so I have no control.

Was this with respect to the Animal Welfare Bill or to trophy hunting, or both?

Chair: It is basically to do with legislation. Are there any lessons we can learn from how the Association of British Tourist Agency guidelines on low animal-welfare experiences? It is trying to make sure the ban on advertising involving trophies works. You probably do not have as much experience in South Africa but what is your considered view on it?

Dr Delsink: I would echo what I did hear Eduardo say, which is that we need very rigorous punitive measures for those who do need to be fined, because otherwise it will not work. We need the penalty to outweigh the risk. That is key.

Just picking up on the last segment of the conversation regarding advertising and so on specifically for these other types of activities, I would strongly draw your attention to sanctuaries in the guidelines proposed by SATSA. They provide excellent guidelines on what qualifies as acceptable or non-acceptable.

Q50 **Chair:** We have a couple of minutes left so could you all just say what you think the Bill should contain; any last comments you would like to make on what you particularly like about the Bill and what you may not? I do not want to prolong it too long but I do want to give you the opportunity. Eduardo, Mark and then Audrey; any comments on the Bill itself and where you think it could it be improved?

Eduardo Goncalves: The main thing is that it needs to be a comprehensive Bill, not least because that is what the public wants. public has been asked whether it should be a Bill that covers just endangered species or all species and the response was very clear. Only 3% of people want a ban on just endangered species; 85% want a total ban.

Trophy hunting can never be a solution for either generating revenue for local communities or for conservation. The case of Cecil was very clear in that respect. We had a man who paid \$50,000 to shoot a lion, a proportion of which would have been the trophy fee. The Oxford University scientists who were monitoring Cecil and all the lions in that area said the cost of conserving Cecil for the 12 years he was alive was \$1.5 million. There is absolutely no doubt that trophy hunting cannot be a solution, nor is it an acceptable one in a modern society. At the end of the day this is something that everyone finds repugnant. It is not a case of the ends justifying the means.

Dr Jones: I would say that in these times of biodiversity being in crisis with so many species facing decline and extinction and the clear links



between the biodiversity crisis and the climate crisis, which has obviously been the subject of huge attention in the UK at moment, and the links with the human health crisis that we have all been living through for the past two years, we have to do better than somehow relying on a strategy of wealthy, predominantly western, trophy hunters to pay to kill increasingly rare animals and add to the problems while providing, at best, very meagre incomes to people and wildlife conservation protection programmes. I believe we have to address the animal welfare and ethical issues that are of primary concern to the public. That takes us beyond just trophy hunting to the other aspects of the Bill that will be designed to outlaw the advertising of those low-welfare tourism practices abroad that we have been speaking of.

We would be looking for robust and comprehensive legislation that will address these issues that of grave concern, certainly to me, to my organisation and to the wider public in the UK.

Q51 **Chair:** Audrey, from a South African point of view, is this Bill going to deliver the right message to try to stop a lot of trophy hunting and stop a lot of breeding of animals for hunting? What would you like to see?

Dr Delsink: I think it absolutely will. What is important is that not all African countries or Africans support trophy hunting, which is contrary to belief. In South Africa itself, which is the second largest exporter of trophies, the Humane Society International Africa conducted a survey that was statistically robust and covered a suite of factors, including gender, culture, household income, education, marital status, employment and so on. It demonstrated that two thirds of South Africans oppose trophy hunting and one fifth or fewer were specifically opposed to trophy hunting of elephants, lions, leopards, rhinos and buffalos. Support of trophy hunting in South Africa dropped from 34% in 2018 to 12% in 2020.

Just because a country exports trophies does not mean all its citizens are in support of that industry. Trophy hunting is often positioned as the panacea for economic benefit, sustainable livelihoods, habitat preservation and conservation. However on a cost benefits analysis, ecotourism is far more beneficial and do not further imperil its species by killing. There are many ways that trophy hunting can negatively impact a species and simply preventing the extinction of a species should not be the goal.

I would like to sum up by quoting Batavia et al who state: "Governments have the right to institute policies that manage the landscape of risk by weighing scientific evidence and accounting the values of their citizens and then emotions attends moral judgment which informs policy. Growing intolerance and ethical disregard of trophy hunting and the increase in global news to more consumptive alternatives in all aspects speaks volumes and should be the key driver for decision makers."

Chair: Thank you, that is a very good way to sum up, Audrey. Thank you



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for getting back after your power cut. It was great to be able to have you here to give us evidence from South Africa today.

Also thank you very much to Mark and Eduardo, an excellent evidence session, thank you. This evidence gives us a good start when we are looking at the Animals Abroad Bill and when we are scrutinising it in the future. That is our role as a Select Committee and the evidence you have given us has enabled us to start putting our report together. It will give us opportunities to put questions to Ministers when they come before us later on in the inquiry.

Thank you all very much for attending this afternoon by Zoom and by Teams. It has been good to see you. At this stage I will wish you well and bring the meeting to a close. Thank you.