

Written Evidence submitted by Voice4Lions (AAB0005)

Voice4Lions is a South African NPO that was set up to raise awareness of the issues facing lions all over the world with particular emphasis on those in South Africa within the commercial industries of captive lion breeding, petting, walking, hunting and the lion bone trade. Before this, both Co-Founders, Sarah Dyer & Linda Park were UK Representative and Director respectively for the International Campaign Against Canned Hunting and between the two of us we have experience in animal welfare and working with wildlife. We are submitting this evidence with a focus purely on the lion species as this is where our expertise and experience lies.

Lions in West Africa are considered critically endangered, those in northern Africa threatened whilst others remain vulnerable. However, it should be noted that there has been no reliable lion count for many years so the numbers remain untrustworthy and therefore could easily move into endangered in all areas. In this call for evidence, you only talk about endangered species which is a change of wording from the original consultation on the topic of banning the import and export of hunting trophies into the UK that closed in February 2020 and one that we believe is incorrect to be focussing on. This ban on the import and export of hunting trophies should be about the Government responding to what the consensus of all UK people wishes to see happen within their own country and is not about the UK telling the world how they should be managing their wildlife as has been claimed. Petitions jointly presented in January 2020 at Downing Street by LionAid, HSI and the Campaign to Ban Trophy Hunting held over 1 million signatures wanting a ban on trophy hunting imports to the UK. In addition, 2 years ago Born Free received over 200,000 signatures on their [petition to Theresa Villiers](#) then Environment Minister to ban the import of trophies into the UK.

For the sake of clarity, we submit this evidence on the basis that we do not believe that the “conservation benefits” of trophy hunting have ever been truly evidenced and the money chain has never been clearly proven to go where claimed either and thus we do not support trophy hunting as a conservation tool.

Original wording from the Government consultation where endangered species wording was never mentioned: *“This consultation and accompanying [call for evidence](#) provide an opportunity for you to present your views and supply evidence to inform aspects of government policy and action on the import and export of hunting trophies. The consultation does not extend to whether the practice of trophy hunting should be banned nor does it cover the domestic sale or possession of hunting trophies.”*

It should also be noted that we believe we should be following the example of Australia when they became the first country to ban lion trophy imports in 2015, even though they were and are not currently endangered. As you will be very aware African lions are listed internationally on Appendix II of CITES. We believe that in accordance with [CITES Article XIV](#), the UK, like Australia, may introduce domestic measures that further restrict trade in CITES listed species therefore we believe that the UK import and export of Trophy Hunting law should include all lions, irrespective of category.

Question 1 Response: Will the Government's proposal on the export and import of hunting trophies effectively support the conservation of endangered species?

The question should really be - would the Government's proposal harm the conservation of any species, endangered or not. Thus, if you are trying to protect something, then will your action actually harm it – the answer here has to be no – the ban on the import of hunting trophies would not do harm to the wildlife it concerns.

Hunting itself can and does harm the overall population of the species as recently evidenced when yet again a lion was baited out of Hwange National Park (hunting is illegal in the park) to be bow hunted on a hunting concession next to the park. The lion was shot and did not die straight away (over 24 hours later according to some reports) – this is another issue of hunting - the inhumane suffering that is caused when a first shot/arrow hit does not immediately kill an animal. Whilst the general rule is that lions should not be hunted under six years of age, and the lion killed this month in Hwange was 12 years old, it should be noted that he was still breeding and protecting his pride. Killing a pride male puts the rest of the pride in grave danger as other males from outside the territory take over the pride. This results in any cubs being killed and often lionesses too as they fight to protect their young. One lion hunted can equate to many deaths. This is certainly not conservation.

We think the voices of the stakeholders in Hwange say it all in a quote from them after Mopane was killed *"We, as stakeholders in Hwange, are forced to speak anonymously due to imminent threats posed by hunters and ZimParks profiteering from the hunting of lions. We are absolutely devastated by the killing of Mopane, a dominant pride male that lived in Hwange National Park and its boundaries. The killing of dominant males on the boundary areas is not conservation. It is unsustainable and will lead to the further demise of an already depleted and dysfunctional lion population."* So, as in your original question – will the ban on importing hunting trophies support conservation - the answer is yes as at least in the UK we can be sure that the death of a wild animal is not caused by a person wishing to bring a trophy back into the UK!

Whilst it may make life tougher for the hunting business, taxidermists and the others in the business chain, it is entirely possible for them to change to reflect different thoughts and ideologies as we move forward in our thinking on certain topics. Just because something has been done one way for years does not make it morally or ethically correct. To not do something just because it might be harder and could take time to make changes for the better is really not a winning argument.

Question 2 Response: Should there be different rules for the trade in animal trophies depending on the setting in which the animal was hunted?

It should be particularly noted that in South Africa the number of lions has been swelled dramatically by those held and bred in captivity. No one currently has a true handle on the numbers but there could be anywhere between 10-12 thousand which are bred to be used in the commercial industries of petting, walking, hunting and killed for their bones as part of the lion bone trade in addition to being supplied to overseas zoos, private facilities etc. At

the same time, numbers in the wild are threatened. Captive-bred lions cannot be released into the wild for a number of very valid reasons.

In addition, the South African Government recently announced a review to the policy position on the conservation and ecologically sustainable use of elephant, lion, leopard and rhinoceros. Submissions for this review closed at the end of July and we now await further response from the Government. However, in the [launch speech](#) of this policy review the Minister for the Department of Forestry, Fisheries and Environment stated that *“The panel identified that the captive lion industry poses risks to the sustainability of wild lion conservation resulting from the negative impact on ecotourism which funds lion conservation and conservation more broadly, the negative impact on the authentic wild hunting industry, and the risk that trade in lion parts poses to stimulating poaching and illegal trade. The panel recommends that South Africa does not captive -breed lions, keep lions in captivity, or use captive lions or their derivatives commercially. I have requested the department to action this accordingly and ensure that the necessary consultation in implementation is conducted.”* Whilst we do not agree with the South African Governments’ wish to make South Africa a wild hunting destination of choice, we do agree that captive lion breeding for any purpose has nothing to do with conservation, is fraught with mistreatment and inhumane welfare conditions for those lions within the industry and therefore totally support their wish to close this industry down.

The UK Government therefore should take their lead and accept their call that this is an unacceptable practice and support the South African Government by immediately banning any trophy imports or exports coming from lions bred in captivity.

Question 3 Response: What are the possible unintended consequences of the proposals, for example in relation to animal trophies that pre-date the legislation?

This is a question that should be asked of those countries who have already put in place bans of hunting trophies as they will have very real examples of what issues were caused but more importantly how they worked around those issues. Consult with those who actually have full knowledge and experience of implementing this type of ban. For example, the Honourable Members of Parliament in Australia – [Jason Wood](#) and [Greg Hunt](#).

Question 4 Response: How effective are current measures on the trade in trophies of hunting, including how they support conservation?

[“Until the lions start writing their own stories, the hunters will always be the heroes.”](#)

(Kenya & Zimbabwe proverb) When a hunter brings home a lion (or any animal) it may very well be due to the hunter’s skills, but it may as well be due to pure luck. The lion might have been sleeping or injured. No matter in what circumstances the lion is killed, a hunter will always tell a story that makes the hunter shine. Is the hunter telling the true story or just bragging? No one will ever know.

Even the IUCN who are pro trophy hunting admit there are problems within the industry as reported in their document [“Informing Decisions on Trophy Hunting”](#) .

We have always said, show us the black & white evidence and the money trail of all the good things that so many say come from hunting – it has never been clearly and transparently shown as far as we are aware. It is no good going to a community that gets some monetary benefit from hunting as they will be scared of repercussions if they say that the benefit is not much.

The following is quoted from the IUCN document “Where there are problems in governance and management of trophy hunting, as there are in many places, it will be most effective to actively engage with relevant countries to improve quality of governance and management, including increasing transparency in funding flows, community benefits, allocation of concessions and quota setting; strengthening of rights and responsibilities of indigenous peoples and local communities; and improving monitoring of populations and of hunts. There are important roles for many hunting stakeholders in improving standards, including importing countries, donors, national regulators and managers, community organisations, researchers, conservation organisations, and the hunting industry and hunter associations in reaching these standards.”

Lions around the world have experienced large population declines and significant habitat loss. As an apex predator they play a vital role in the health of the eco-system and their demise will have a big impact on the biodiversity that this planet needs to remain healthy. As stated previously trophy hunting can disrupt social structures and bring about changes to pride dynamics. *“Decisions regarding hunting quotas, zones, and seasonal restrictions are often not based in science, but instead are dictated by local hunters or hunting organisations and based on overestimated population sizes.”* This and many further conservation issues with trophy hunting can be found in the recent report presented to the European Parliament in June this year by HSI entitled [Trophy Hunting by the Numbers: The European Union’s role in global trophy hunting](#).

CITES is not fit for purpose as it stands, it does not have the funds to function properly and [“The result is that assessment is inadequate and protection of species generally relies on often poor national governments or NGOs and philanthropists. Developing countries carry most of the costs of implementing the convention, but get no funding to do so.”](#)

An Australian NGO called Nature Needs More highlights how CITES is failing and what could be done to modernise it. [Modernising CITES A Blueprint for Better Trade Regulation](#).

Question 5 Response: What will be the impact of the proposed domestic ban on advertising and offering for sale overseas attractions, activities or experiences that involve the unacceptable treatment of animals?

The UK holiday and volunteer market for sending UK citizens to facilities that allow unacceptable practices has already been changing for a number of years due to public reaction to such practices so this is not something new. Many organisations have already stopped sending guests to facilities that include lion petting and walking for example and have implemented their own animal welfare guidelines to be respected by those they work

with and those who travel with them. In this case the Government is actually behind the times and should be supporting those who already have made the leading decision to protect wildlife and not use or abuse it for entertainment and monetary gain.

Travel regulatory bodies such as ABTA created animal welfare guidelines a number of years ago which are updated every 3 years. Although these are currently voluntary for ABTA members to abide by, they do challenge member organisations to respond accordingly or lose public faith in them and therefore loss of business. Indeed, in their last guideline update in December 2019, amongst other new stronger guidelines, lion petting and walking was moved from a discouraged practice to an unacceptable practice so their members are already not advertising nor offering any activity that would be considered as unacceptable treatment of animals.

With regard to hunting operators based in the UK they either need to change their business model or will possibly move their organisations overseas, collaborating with other hunting organisations or advertise overseas only instead with, we believe, minimal impact on their income.

A ban will also go in some part to protecting wildlife from the [cruellest wildlife tourist attractions](#) around the world that are currently in practice. Every step we take to protect these animals is a step in the right direction for them.

You would also be providing a health protection to the UK public. As we are very aware now zoonosis can have global health impacts. Not all zoonoses are as dangerous as to cause a pandemic but every interaction with wildlife has the possibility to transmit a zoonotic disease at some level. Over 60% of emerging infectious diseases are zoonotic in origin and over 30 new human pathogens have been detected in the last 30 years, 75% of which originated in animals. Taking part in unacceptable practices abroad could very well mean UK citizens who fall for the wildlife interaction cons could contract a zoonosis as part of their activities when abroad.

Question 6 Response: Who should be responsible for ensuring attractions, activities or experiences overseas do not cause the unacceptable treatment of animals?

The Advertising Standards Authority (ASA), all travel related bodies such as ABTA, AITO, IATA, ABTOT, ITOL, ATTA etc, organisations that offer hunting packages outside of the UK, the general public, the UK Government, International Governments and anyone who either regulates, offers trips to places that contradict in country legal or voluntary guidelines on treatment of or who makes any form of income from such activities should have a certain level of responsibility with the actual level reflected highest in the ASA for the public to raise complaints and the travel related bodies (including those who offer hunting packages) for not offering or advertising these unacceptable practices.

In the UK we should also be able to report organisations to the Advertising Standards Authority with evidence that unacceptable practices are occurring or are in contravention of guidelines. ASA could easily set up an Ethics Committee to review any complaints and using

the ABTA animal welfare guidelines would be a very good base guide to deal with any complaints that are sent to the ASA.

We should also respect the desire of overseas travel bodies who have guidelines for their members when it comes to unacceptable treatment of animals. Take for example the [SATSA Evaluating Captive Wildlife Attractions & Activities](#) tool which highlights for visitors, owners of facilities, buyers (tour operators, DMCs etc) and Representatives (industry associations, local government, tourism marketing agencies etc) what is considered unacceptable practices in regard to captive wildlife attractions and activities.

We thank you for the time taken to read our submission and we are happy to supply further information if required. In the meantime, we believe the following quote should spur us on to be strong and make the changes that are so wanted by the UK public and definitely needed for the protection of the lion species.

“The soft-minded man always fears change. He feels security in the status quo, and he has an almost morbid fear of the new. For him, the greatest pain is the pain of a new idea.”
Martin Luther King, Jr.

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