

Written evidence submitted by A1 (AAB008)

1. Will the Government's proposals on the export and import of hunting trophies effectively support the conservation of endangered species?

Introduction

- The government's proposals on the import and export of trophies will not support the conservation of endangered species. Rather it will have the opposite effect and will impact on vital conservation funding. I have outlined my justification below (both on import and export)

Export:

- Firstly, there are no "endangered species" that are hunted in the UK. Should any restrictions be placed on the export of deer "trophies" in the UK, it will have a detrimental impact to the overall quality of the UK deer population. Trophy hunting in the UK for export is primarily linked to the six wild species of deer that are present, and deer that form part of deer parks, which are not present in the wild (Pere David, Elds Deer, Sambar etc). None of the UKs wild deer species are endangered or threatened.
- Park Deer (such as those at Woburn, Windsor, etc.) have no ability to move from the park, so need to be managed. The control of deer in Park settings is part of an overall plan to maintain the health and wellbeing of the herd – culling a small number of the older deer is part of the overall plan, and allowing a small number to be shot as "trophies" by visiting tourists provides income to the estate and the local community, whilst completing an activity that needs to be done regardless.
- The wild deer of the UK are not endangered, and indeed in many parts of England and Scotland are deemed to be pests. In the UK all deer management activity is part of a controlled cull and management plan. Cull plans require a cross section of the population of deer to be managed including older "trophy deer". Due to large deer numbers in the UK, a ban on "trophy hunting" of deer will only have the effect of not enabling deer to reach maturity, as their primary value will be the value of the meat. Indeed, through not being able to charge more for a "trophy" deer there will be minimal incentive to allow the wild herds of the UK to grow into mature "trophy" animals. A good example of this is the wild red deer of East Anglia. A small number of estates (Euston, Elveden and others) shoot very small numbers of wild stags each year, but those that they do shoot are old, and have had a life where they have passed their genetics on to the herd. In contrast, landowners that don't have revenue from the red deer population shoot them as pests, or for venison.
- In summary, any proposed export ban would have no benefit to conservation efforts, and indeed would likely have a detrimental impact on the quality of deer in the UK and destine them to pest animals that will be shot on sight.

Import:

- It is encouraging that the aim of this consultation is on conservation rather than preservation, as hunting is a crucial component of effective wild animal conservation. We tend to always look towards Africa and question whether the hunting £/\$ makes a difference, but the scope of this consultation implies that it is broader than just African game.
- If we were to take a closer look at the United States, the impact of hunting as part of an overall conservation plan is apparent. Each game department in the US defines the annual quota that can be hunted, and for some species dictates the size that it must be before it can be shot (namely, the rarest of US species, the big horn sheep – with the condition being that it must be a mature (or "trophy") animal). Several game departments insist on online

training and familiarisation to ensure that hunters understand how to effectively age animals. The game departments of the US receive a significant proportion of revenue from hunting licences, and numbers of licences and permits are allocated by the holding capacity of the region. Often there are limited permits, and hunters will wait 20+ years to draw a coveted permit for the best regions that produce the best quality animals – paying each year to enter the ballot for a permit, until they eventually draw.

- In the US it is widely accepted that hunters' dollars have re-built populations of bison, sheep, elk, and deer. Yet this proposed legislation could penalise a British hunter wishing to import his elk antlers after paying substantial sums to support the US game departments conservation efforts.
- The same model applies almost universally around the world, but Western animal right groups and governments don't seem willing to trust African conservationists, despite numbers of large game (specifically in Southern Africa where there is a buoyant hunting industry), are increasing. In contrast, countries that have closed hunting have seen animal populations decline mainly due to habitat loss through turning wilderness into agricultural use. Sadly, most non-hunters will never venture outside of a national park to see the impact that this lack of funding has on local communities, and the game that used to co-exist with them. Whereas initiatives such as CAMPFIRE in Zimbabwe incentivise local communities to keep land wild, and to tolerate game, and in return they receive a proportion of hunting revenues.

Summary:

- If any ban on the import of trophies assumes that the killing of certain species will suddenly stop is short-sighted. In Botswana it has been illegal to shoot lions for trophies for some years, but it is perfectly legal to shoot them if they are preying on livestock. Large predators would be tolerated and indeed encouraged if the farmer had the ability to receive income from strictly controlled sport hunting.
- In Namibia – which has the largest population of black rhino and is the only country to allow sport hunting of small numbers of rhino – old black rhinoceros become aggressive and a danger to younger animals. They are past breeding age, so are shot to ensure that they don't wound or kill younger breeding animals. Prior to a CITES quota being applied to these rhinos, they would be shot by the government game department. In doing so, there would be no revenue brought into the Game Department, whilst still resulting in the rhino being shot – whether by a wealthy foreign hunter, or a government game scout.
- Any proposed ban would also show a level of ignorance from the UK government in not understanding how precious wildlife resources are managed, and how solutions are put in place to ensure that people and wild game can co-exist outside of national parks.

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

- No. Assuming the question refers to the so-called "canned" hunting, we should be cautious in defining what issue we are trying to resolve. In many parts of the world (the UK included), large pieces of land are fenced – this is to either keep animals in (deer parks, game ranches, etc.); or keep animals away from forestry or crops (deer fencing); or to keep poachers out and enable effective counting and control of the species within the fenced area (ensuring known numbers, accurate information on numbers that can be taken, etc.). The fencing of properties does not have any detrimental impact on the animals assuming that the piece of land is big enough and has sufficient natural resources for the game. The size of fenced

areas varies according to the country – the UK being a smaller country may have small deer parks of 100 acres; whereas in Australia, Argentina, the US, and Southern Africa where hunting takes place on enclosed areas, these areas may extend to several hundred thousand acres.

- The biggest threat to wildlife is the loss of suitable habitat. The success of much of Southern Africa's species has been as a result of re-wilding farmland to make it more suitable for game animals. ***Creating habitat rather than destroying it!*** Game animals are hardier than cattle, have more tourist appeal (hunting as well as photographic safaris), and create less impact on the environment. However, to be successful in the development of "game farming" the game must be owned by the landowner, hence the need to fence. Hulne Park in Northumberland is a good example of a UK enclosed area – 5000 acres of walled forest and moorland, that is home to red deer and fallow. These deer aren't wild because they are behind an ancient wall, but you would struggle to notice any difference – other than they are easier to manage within an enclosed area.
- We often think of fenced hunting as "canned lion" shooting in small areas where the lion has just been released from a cage. This may indeed happen, but this is a very small proportion of the hunting that takes place in Africa, the UK, Europe, US, or anywhere for that matter. If the consultation intends to consider whether "canned lion hunting" should be banned, they will find that a large proportion of the hunting community have already opposed the hunting of large carnivores in enclosed areas, and there is current legislation being passed in South Africa to ban the practice. This legislation will have no bearing on "canned lions" but will unfairly penalise those landowners who have created habitat for wild game rather than put it under the plough and shoot wildlife as a pest.

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

- The unintended consequences of any legislation will be:
 - In the event of an export ban on British trophies, the result will be a loss of income to rural communities. Possibly the greater impact will be on the population of UK deer themselves – trophy deer are deer that have been allowed to grow; have been allowed to cause damage to crops and forestry; are managed to pass their genes on to another generation of deer to create better quality antlers. In a world where no one wants those antlers or heads, all deer will find themselves in the gunsights before they get to an age that carries quality antlers.
 - The unintended consequences of an import ban would be loss of income to overseas rural communities; increase in land use for agriculture; loss of interest in preserving game as it eats crops; less desire to stop poaching; increase in bushmeat trade as animals aren't viewed as valuable to visiting hunters but provide much needed protein.
- The question references pre-dated trophies. This implies there could be a ban on existing or antique trophies, which seems bizarre. Firstly, there is no register of such trophies, and everything from The Natural History Museum at one end the spectrum, to pubs, antique shops, and personal collections will fall in between. Any ban on the ownership of trophies would be impossible to police and won't "turn the clock back" on the animal being killed – the antique tiger skin that was shot in the 1800's died a long time ago.

- The other unintended consequence is that the UK is taking a position on the world stage of “we know best” when many wildlife departments across the globe have very well-established controls in place, and hunting (and specifically “trophy” hunting) is a significant source of income. So, this legislation will give more credibility to Ricky Gervais than most wildlife biologists, and front-line game wardens in the world. It will also have a negative impact on our own deer conservation efforts which seems peculiar – we pass legislation with the intent of protecting animals, whereas the consequences will be the complete opposite.

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

- The current controls are well established and robust. All examples of trophy hunts that have made news headlines have been hunted, exported, and imported legally. The fact that people may not understand or like hunting as a mechanism for conservation and revenue generation, shouldn’t detract from the reality that hunting is well regulated, and there are significant controls in place.
- Depending on what country an animal is hunted in, it will require significant authorisations before it can be exported to the UK:
 - A valid hunting licence or permit to show that the hunt was conducted legally – and that it was taken as part of an approved quota. Depending on the species the quota is set by CITES, by the government game department, or by the landowner.
 - If an animal is governed by CITES or any other body, a certificate from that body is required to confirm that the animal formed part of the allocated quota.
 - Veterinary checks are required to ensure that the skin, bones, antlers, are free from animal borne diseases. Veterinary checks are required when the animal clears customs in the UK.

Summary:

- In exporting wild game, there are several controls and checks to ensure that the species was hunted legally. On return to the UK the checks are solely on whether there is a CITES permit and whether the animal is safe to be brought into the UK (that is has appropriate veterinary checks). Almost universally, the export controls from the host country are significantly more robust than those applied at entry to the UK. The UK government should be comforted that most countries where trophies are exported from have significantly more control in ensuring that the species were hunted legally.

5. 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?

- I shall only comment on a ban on advertising or selling of hunting overseas. Otherwise, I would be drawn on the ineffectiveness of any proposed legislation on overseas farming practices, and other activities that we would have limited ability to police or determine what is “right”.
- With regards to the marketing and selling of hunting, the banning of it would be completely pointless. Firstly, we have limited ability to police the internet so I am unsure of how it

would be policed; secondly, there is an assumed position that hunting is somehow wrong, when in fact as a conservation tool, it is contributing valuable funds to wildlife departments and local communities around the world – why would that be something we would wish to ban? Finally, we are assuming that the UK's wildlife practices are somehow superior to anyone else and that it is acceptable to rent a Scottish lodge via a leading estate agent for a week and whilst there have the ability to shoot a deer, yet a community-based hunting safari in Cameroon is wrong.

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

- The relevant country should oversee what is and isn't acceptable in accordance with their own legislation, culture, and existing controls that have proven to be sufficiently robust over the past decades where game numbers have consistently risen in number in areas where well-regulated hunting exists.

Conclusion

- This proposed legislation is unworkable and is ignorant of what science-based wildlife conservation is. Taking a broad ban approach to all hunting trophy imports and exports may be vote winning, and popular with the media, but it does have the real possibility of causing more potential harm to wildlife, rather than the protection which I assume is the goal. As part of last year's consultation on the import of hunting trophies, there were several submissions by game departments across the globe; input from community leaders; and science-based fact on the impact of wild game populations in countries that continue to allow recreational sport hunting. I hope that this consultation doesn't lose sight of those submissions and that a conservation mindset is adopted over ill-informed sentimentalism.