

Written evidence submitted by Community Leaders Network of Southern Africa, Namibian Association of CBNRM Support Organisation, Resource Africa United Kingdom (AAB0010)

Summary

In response to the call for evidence from the UK government, the Community Leaders Network of Southern Africa, Resource Africa, the Namibian Association of CBNRM Support Organisations and seven other African institutions hereby submit key information and data for consideration. The proposal to ban the import of hunting trophies into the UK will not support the conservation of endangered species, but rather undermine successful community-based conservation in several African countries. There are numerous unintended consequences to this proposal – of particular concern is that it ignores the rights of local communities to sustainably use their wildlife and overlooks the substantial economic contribution that hunting makes to rural livelihoods. The UK's proposal to ban trophy imports will not reduce illegal wildlife trade or improve animal welfare outcomes. Instead, the evidence submitted here suggests that hunting bans are likely to increase the illegal killing of wildlife, which is unregulated and most often inhumane. Consequently, parts of the Animals Abroad Bill as it is currently written will undermine African community conservation efforts and lead to worse animal welfare outcomes.

Introduction

The Community Leaders Network (CLN) of Southern Africa, Resource Africa United Kingdom (RAUK) and the Namibian Association of CBNRM Support Organisations (NACSO) hereby submit evidence in response to the UK Parliament's call for evidence regarding the Animals Abroad Bill.

The CLN is a collaborative grouping of rural representatives from Angola, Botswana, Malawi, Mozambique, Namibia, South Africa, Tanzania, Zambia and Zimbabwe that focuses on amplifying the voices of rural African communities at national, regional and international levels. The CLN's goal is to establish equitable and sustainable use rights of our wildlife and other natural resources for social and environmental justice and the economic benefit of present and future generations of rural peoples.

RAUK is a registered charity in the UK that supports rural African community efforts to secure their rights to access and sustainably use their natural resources in order to sustain their livelihoods. RAUK's goal is to increase recognition and respect for the right of peoples to sustainably use and benefit from the resources on their land by enhancing community leaders' ability to engage and exercise their agency in policy processes at all levels.

NACSO is an association of nine Namibian non-governmental organisations that provide quality services to rural communities seeking to manage and utilise their natural resources in a sustainable manner. NACSO members support rural communities that

are engaged in the national community-based natural resource management (CBNRM) programme.

This submission is co-signed by seven institutions from six African countries (see list at the end) that work with rural communities that are engaged in CBNRM. CLN, RAUK, NACSO and their partner institutions are submitting this evidence because aspects of the Animals Abroad Bill pertaining to the import of hunting trophies to the UK will have a negative impact on rural communities in southern Africa, particularly those engaged in CBNRM. This submission outlines the potential impacts of the Bill in response to the six specific questions posed in the call for evidence.

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

The Government's proposals on the export and import of hunting trophies seriously risk undermining community-led efforts that have demonstrably proven efficacy in conserving endangered species. Rigorous scientific studies (summarized here¹) and the evidence presented on behalf of millions of rural Africans² clearly demonstrate that it will cause significant and potentially irreversible damage to conservation of endangered species. This is particularly the case in Southern African countries where a rights-based approach to conservation is adopted through Community-Based Natural Resource Management (CBNRM). The consequences of the ban will be to significantly reduce the incentives of those who live with and are the custodians of wildlife to manage and conserve endangered species.

Ample research exists demonstrating that hunting provides net conservation benefits to certain species, including in the UK where it is widely adopted as a wildlife management strategy. Trophy hunting is a form of hunting that pays a premium for using a very small percentage of wildlife populations, which is more easily managed for sustainability than hunting for meat (that would increase if trophy imports are banned). More significantly, trophy hunting generates conservation benefits way beyond the hunters' target species. In African countries where trophy hunting is practised, more land has been conserved through trophy hunting than in National Parks and other state protected areas³. This benefits all species of fauna and flora, not just 'charismatic' species.

Despite the evidence of the positive impact of trophy hunting on species and habitat conservation throughout dozens of African countries which is readily available in peer reviewed publications, it is more difficult to identify these specifically in relation to the UK as reliable data on where trophies are exported to is not readily available in country and the CITES database has limitations in this respect. Had the question been

¹ <https://thehill.com/changing-america/opinion/539071-misinformation-about-trophy-hunting-is-wrong-dead-wrong?amp>

² <https://resourceafrica.net/video-let-africans-decide/>

³ Lindsey et al. (2007) Economic and conservation significance of the trophy hunting industry in sub-Saharan Africa. *Biological Conservation* 134, 455-469.

generalized to the impact of hunting, examples below would have been far more extensive and it should be noted that should the UK ban the import of trophies this could trigger similar bans in other countries leading to a massive detrimental impact to conservation efforts in Africa far beyond those related to the examples provided here.

- Generally, trophy hunting benefits non-hunted species through site protection activities, which provide a “biodiversity umbrella” for many species in areas where hunting is practised. For example, in Zimbabwe, black rhino, white rhino and the African wild dog, which are not hunted, have all received conservation benefits through the biodiversity umbrella. The UK has imported 463 CITES listed trophies from Zimbabwe since 2000⁴.
- Hunting revenues at the Buby Valley Conservancy (BVC) in Zimbabwe, which has an average of 20 hunters from the UK per annum, pay for 95% of the costs of black rhino management in the conservancy. The BVC has the 4th largest population of black rhino in the world⁵.
- Robin Hunt Namibia, a hunting outfitter for the Groot Gamsberg Wildlife Sanctuary in Namibia, reports that roughly 5 trophies are exported to the UK per annum from this sanctuary and that 80% of hunting revenues is invested directly into conservation efforts. This led to an increase in rhino numbers (non-hunted species) from 5 to 9 over the past four years⁶.
- In Namibia, the revenues generated by trophy hunting of elephants in particular support a large number of communal conservancies. Simulations show that a hunting ban would result in significant negative impacts on both local people and wildlife, with large areas likely to be lost to conservation⁷.
- At the Kambaku Wildlife Reserve in Namibia, which has an average of 7 hunters from the UK per annum, hunting contributes to the management of wildlife populations, which helps to prevent overgrazing and damage to the overall habitat. It also finances all of their conservational efforts, such as supplying water and waterholes, anti-poaching efforts, maintenance of fences and roads etc. In addition, hunting revenues enabled the Kambaku Hospitality and Wildlife College to be founded and built, which is a certified school within the reserve. It has trained local people in hospitality, as well as wildlife guide training, which has enabled them to move onto management positions in other lodges, and teaching positions⁸.
- The Save Valley Conservancy in Zimbabwe, which hosts a number of UK hunters every year, funds rhino protection through the offtake of elephants. The average annual quota of 7 elephants, generating roughly \$400,000 p.a., funds

⁴ https://www.iucn.org/sites/dev/files/iucn_sept_briefing_paper_-_informingdecisionstrophyhunting.pdf & CITES Trade Database

⁵ Personal communication: General Manager of the Buby Valley Conservancy, Zimbabwe

⁶ Personal communication: Professional Hunter, Groot Gamsberg Wildlife Sanctuary, Robin Hunt Namibia

⁷ Naidoo, et al. (2016) Complementary benefits of tourism and hunting to communal conservancies in Namibia. *Conservation Biology*, 30(3):628–638)

⁸ Personal communication: Stefan Michels, Manager of Kambaku Wildlife Reserve, Namibia

the employment of 40 game scouts, which has allowed the rhino population to grow from 45 to almost 200 to date. These efforts have also led to a 90% reduction in poaching in the conservancy⁹.

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

A ban on trophies from animals raised in captivity should be considered but would need to be carefully differentiated from animals hunted in the wild.

There are legitimate animal exploitation and abuse concerns about animals bred in captivity with the only purpose of shooting them for trophies and such animals can have serious negative genetic implications for wild populations.

This practice has no conservation benefit and provides no incentives for rural people to conserve wildlife and wild lands.

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

The unintended impact of the proposals will be to undermine the human rights, governance systems and livelihoods of millions of rural Africans who are the custodians of wildlife and currently benefit, primarily through income generated by conservation hunting, through the sustainable use of the natural resources on which their livelihoods depend. These rights are upheld in both international (e.g. The UN Declaration on the Rights of Peasants and Other People Working in Rural Areas (2018, article 28 **'Peasants and other people working in rural areas have the right to have access to and to use in a sustainable manner the natural resources present in their communities that are required to enjoy adequate living conditions)** and national law of affected countries. Undermining rights and livelihoods as these communities struggle to recover from COVID is particularly egregious.

Additionally, the notion of sustainable use, which encompasses trophy hunting, is also stressed in relevant provisions of existing key environmental instruments including the Convention on Biodiversity (CBD), Convention on the Conservation of Migratory Species of Wild Animals (CMS) and CITES (Convention on International Trade in Endangered Species of Wild Fauna and Flora); the United Nations Convention to Combat Desertification in Those Countries Experiencing Serious Drought and/or Desertification, Particularly in Africa, the United Nations Framework Convention on Climate Change and the Paris Agreement, and the Convention on Wetlands of International Importance especially as Waterfowl Habitat (the "Ramsar Convention"), the United Nations Convention of the Law of the Sea, and the 2030 Agenda for Sustainable Development. At the regional level in Africa, a fundamental objective of the African Convention on the Conservation of Nature and Natural Resources is to foster

⁹ Personal communication: Owner of Save Valley Conservancy, Zimbabwe

the conservation and sustainable use of natural resources. Also, sustainable use is a key component of the Aspiration 1 dealing with inclusive growth and sustainable development under the African Union Agenda 2063.

Quantifying the exact extent of even economic benefits – including cash income, employment, protein, reduction of human wildlife conflict, improved social infrastructure (roads, schools, clinics) – for communities throughout Africa is not feasible at this time. Significant variations exist from country to country and no centralised database exists from which Africa-wide information can be extracted and analysed to produce data. For example, in Namibia 100% of income from trophy hunting on communal land goes to the local community; whilst in Zimbabwe, 55% is allocated to local communities. More significantly, attempts to quantify economic benefits and portray these as representative of the merits of inclusive and citizen-driven conservation efforts of Africans obscures the far-reaching socio-political implications of these initiatives for rural Africans. The ability of CBNRM to empower citizens, ensure accountable and inclusive governance and provide resilient livelihoods is evident in many countries, with Zimbabwe providing a notable example^{10,11}.

The value of this to democratisation and good governance throughout Africa is not quantifiable in financial terms but should be considered as one of the greatest indirect contributions of hunting to an equitable and fair wildlife economy.

Some examples of the community initiatives that a proposed ban would unintentionally undermine:

- In Namibia, conservation hunting generated \$ 39,598,195 Namibian dollars in 2019, through either cash or in-kind benefits¹². Communal conservancies in Namibia receive on average 20% of national hunting revenues (with the remaining going to private landowners that also conserve a substantial amount of land and wildlife). 100% of hunting revenue generated on conservancy land accrues to these communities. Since 2000, 331 CITES-listed trophies have been exported from Namibia to the UK¹³.
- The CAMPFIRE program in Zimbabwe returns 55% of income from hunting revenues to local communities, with the remainder spent on wildlife management and local government administration. Between 1986 and 2006, CAMPFIRE generated over £30 million, 90% of which came from trophy hunting¹⁴.

¹⁰ Rihoy and Maguranyanga (2007) Devolution and democratisation of natural resource management in southern Africa; A comparative analysis of CBNRM policy processes in Botswana and Zimbabwe. <http://hdl.handle.net/10566/4424>

¹¹ Rihoy et al. (2007) 'People are Not Happy' - Speaking Up for Adaptive Natural Resource Governance in Mahenye, Cape Town: PLAAS, University of Western Cape.

¹² <https://communityconservationnamibia.com/support-to-conservation/livelihoods/sources-of-returns>

¹³ http://www.nacso.org.na/sites/default/files/State%20of%20Community%20Conservation%20book%20web_0.pdf & CITES Trade Database

- During 2013-2015 in Tanzania, 28 CITES-listed trophies were exported to the UK and funds from the hunting industry were used for the following: Anti-poaching (mobile anti-poaching teams, aerial support, communication and GPS equipment, armament): over US\$1.8 million; Block Development (roads and airstrip): over US\$1.9 million; Community Development: over US\$1.7 million¹⁵
- At the Kambaku Wildlife Reserve in Namibia, which has an average of 7 hunters from the UK per annum, 100% of trophy hunting revenues go back into local communities, in the form of infrastructure, education and salaries. Hunting directly generates jobs for ca. 25 people at the reserve. In addition, 50% of the meat from hunts is distributed to the people that live on the reserve and their families – total annual meat production is around 30-35 tons¹⁶.
- In Botswana, in 2008, safari hunting generated P 7,382,097 (Pula) while photographic tourism generated only P 2,374,097. Between 2006–2009 community managed hunting generated P 33,041,127 while photographic tourism generated only P 4,399,900¹⁷. The ban has since been reversed due to its negative impacts on conservation and communities.
- In Namibia, Khwe San and the Mbukushu indigenous peoples (around 5000 people) earn US\$155,555 per annum through trophy hunting. Hunting is one of their only forms of cash or subsistence income generation as these communities reside in a National Park, where animal husbandry and agriculture is prohibited¹⁸.
- The value of trophy hunting to South Africa's economy is estimated to exceed US\$340 million annually and supports more than 17,000 employment jobs¹⁹.

It is also informative to consider the impacts in those cases where hunting bans have been introduced:

Before the hunting ban in Botswana, hunting revenues in Northern Botswana funded community projects including: the construction of houses for the needy, funeral insurance and expenses for all members, scholarship and household dividends. Further benefits included better housing, water reticulation, income to households, better diets, infrastructure development such as lodges, roads and vehicles for transportation. Before community managed hunting programs, such schemes were not available to

¹⁴ Taylor, R, 2009, Community based natural resource management in Zimbabwe: the experience of CAMPFIRE. *Biodiversity and Conservation*, 18:2563-2583

¹⁵<https://ec.europa.eu/transparency/regexpert/index.cfm?do=groupDetail.groupDetailDoc&id=33600&no=48> & CITES Trade Database

¹⁶ Personal communication: Stefan Michels, Manager of Kambaku Wildlife Reserve, Namibia

¹⁷ Mbaiwa (2017). Effects of the safari hunting tourism ban on rural livelihoods and wildlife conservation in Northern Botswana. *South African Geographical Journal*. 100. 1-21. 10.1080/03736245.2017.1299639.

¹⁸ https://www.iucn.org/sites/dev/files/iucn_sept_briefing_paper_-_informingdecisionstrophyhunting.pdf

¹⁹ Saayman et al. (2018). The economic impact of trophy hunting in the South African wildlife industry. *Global Ecology and Conservation*, 16: e00510.

<https://doi.org/10.1016/j.gecco.2018.e00510>

communities. In December 2014, communities in the Ngamiland District stopped receiving these benefits as a result of lack of funds to finance them^{20,21}.

The hunting ban in Botswana (2014) had an impact on local communities²² within 12 months. In the Okavango Delta, a total of P 7 million (Pula) and 200 jobs were lost due to the hunting ban. In the Ngamiland district, the Mababe Village had its tourism income drop by 86% from P 3.5 million to P 500 000, in addition to losing 30 jobs; Sankoyo Village had its income drop by 49% from P 3.5 million to P 1.8 million, experiencing 35 job losses; Okavango Kopano Mokoro Community Trust's income fell 48% from P 4.8 million to P 2.5 million and about 40 people lost their jobs. Other projects in the Okavango Delta and Mgakgadikgadi Pans (such as Seronga, Gudigwa, Phuduhudu and Xaixai projects) experienced job losses totalling about 80 jobs.

In the Chobe District, the Chobe Enclave Community Trust (CECT) had its annual income drop by 46% from P 6.5 million (Pula) to P 3.5 million in 2014, in addition to 15 lost jobs (game trekkers, escort guides and skimmers). The KALEPA Community Trust was closed down entirely, due to its reliance on hunting.

Aerial survey teams covering northern Botswana reported a substantial increase in elephant poaching between 2014-2018, coinciding with the hunting ban²³.

The 2001–2003 ban on trophy hunting in Zambia resulted in an upsurge in poaching due to the removal of community incentives for conservation²⁴.

Kenya introduced a nationwide ban on trophy hunting in 1977. Since this date Kenya has witnessed a 70% decline in wildlife numbers. This is commonly attributed to local communities having severely limited incentives to sustainably manage and benefit from wildlife resources, whilst bearing significant costs²⁵.

²⁰ Mbaiwa. (2017). Effects of the safari hunting tourism ban on rural livelihoods and wildlife conservation in Northern Botswana. *South African Geographical Journal*. 100: 1-21.

²¹ Rihoy and Maguranyanga (2007) Devolution and democratisation of natural resource management in southern Africa; A comparative analysis of CBNRM policy processes in Botswana and Zimbabwe. <http://hdl.handle.net/10566/4424>

²² Mbaiwa (2017) Effects of the safari hunting tourism ban on rural livelihoods and wildlife conservation in Northern Botswana. *South African Geographical Journal*. 100:1-21.

²³ Schlossberg et al. (2019) Evidence of a Growing Elephant Poaching Problem in Botswana. *Current Biology* 29, 2222–2228

²⁴ Lewis and Jackson (2005) Safari hunting and conservation on communal land in southern Africa. In: Woodroffe, Thirgood & Rabinowitz (Eds.), *People and Wildlife, Conflict or Co-existence?* Cambridge: Cambridge University Press.

²⁵ Ogutu et al. (2016) Extreme Wildlife Declines and Concurrent Increase in Livestock Numbers in Kenya: What Are the Causes? *PLoS ONE* 11(9): e0163249.

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

Current controls of CITES and EU regulations are based on rigorous conservation science. Introducing alternative policies which are based on ideology rather than science runs a high level of risk of having a detrimental conservation impact as well as undermining human rights and livelihoods.

Where differentiation is required this is already accommodated for in existing regulations. Notwithstanding that the UK is no longer part of the EU, the European Union (Withdrawal) Act 2018 continues to ensure that the EU Wildlife Trade Regulations remain part of UK law.

According to “Regulation (EC) 338/97” of the EU Wildlife Trade Regulations, EU member states can suspend imports with regards to certain species and countries in cases where there is a negative opinion of the EU Scientific Review Group, or existing EU import suspensions.

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?

In general, trophy hunting does not lead to animal welfare abuse, although as in any industry there are limited examples of non-adherence to regulations. Conversely, several species, including lion, fare worst in areas where there is no photo-tourism or trophy hunting and unregulated killing can be more prevalent than in hunting zones, leading to serious repercussions for conservation and animal welfare²⁶.

Whilst it is entirely legitimate to recognise that animal welfare and rights concerns are paramount to some people in the UK, it should be recognised that those who place animal welfare and rights above all else, including species conservation and human rights, are often informed by a specific ideology and worldview. This may not accord with those who view wildlife through a different cultural lens informed by living with dangerous wild animals. A more commonly held view acknowledges the paramount importance of recognising human rights and welfare concerns – common to all ideologies and upheld by international law – which arise when peoples’ rights to manage and benefit from the resources on which they rely for their livelihoods are not recognised, or when they suffer from increased human-wildlife conflict, as in the case of Botswana, as a result of hunting bans.

No comment on other forms of overseas attractions which involve animals.

²⁶ Dickman (2015), in *Conflicts in Conservation: Navigating Towards Solutions*, in Redpath, Gutierrez, Wood, Young, (Eds.) Cambridge University Press, Cambridge, pp. 30-32.

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

Following the principal of self-determination, the sovereign governments of those countries in which these activities take place should bear this responsibility.

Co-Signatories

1. Communal Areas Management Programme for Indigenous Resources (CAMPFIRE) in Zimbabwe
2. Ngamiland Council of Non-Governmental Organisations (NCONGO) in Botswana
3. Zambian Community Resources Boards Association (ZCRBA)
4. Kasungu Wildlife Conservation for Community Development Association (KAWICCODA) in Malawi
5. Community Wildlife Management Areas Consortium (CWMAC) in Tanzania
6. Resource Africa – South Africa (RASA)
7. Wildlife and Environmental Society of Malawi (WESM)

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