

## Written evidence submitted by People for the Ethical Treatment of Animals (AAB0012)

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

If, and only if, the legislation surrounding the importation of hunting trophies is robust enough to prevent any loopholes, it would help prevent cruelty to animals and benefit conservation efforts by disincentivising trophy hunters.

Trophy hunters kill social, emotional, intelligent beings who can feel pain and fear and who value their own lives. These animals already face immense threats from habitat loss and climate change – allowing them to face persecution for human entertainment is needless and irresponsible. Since trophy hunters commonly target animals who are the biggest of their species – in part because the industry offers prizes and awards for the largest trophies – the strongest animals are being lost, making it even harder for many species to adapt to accelerating climate change and habitat loss. The killing of large males is reducing the genetic diversity of species – the gene pool of lions, for instance, has diminished by 15% over the last century. The loss of just 5% of healthy adult males may push lions and other species past the point of no return.

Studies show some remarkable recoveries of wildlife populations where trophy hunting has been curbed or halted. Conservationists successfully persuaded authorities to implement a moratorium on lion hunting in Zimbabwe's Hwange National Park, resulting in much-improved survival rates. A study of lions in Zambia's South Luangwa National Park compared their situation between 2008 and 2012, when they were being hunted for trophies, with their status during a three-year moratorium between 2013 and 2015. The study by Mweetwa *et al* reported that the lion population started to grow again after hunting was stopped:

“The best survival models, accounting for imperfect detection, revealed strong positive effects of the moratorium, with survival increasing by 17.1 and 14.0 percentage points in subadult and adult males, respectively. ... Closed mark-recapture models revealed a large increase in lion abundance during the hunting moratorium, from 116 lions in 2012 immediately preceding the moratorium to 209 lions in the last year of the moratorium. More cubs were produced each year of the moratorium than in any year with trophy hunting. Lion demographics shifted from a male-depleted population consisting mostly of adult ( $\geq 4$  years) females to a younger population with more ( $>29\%$ ) adult males. These data show that the three-year moratorium was effective at growing the Luangwa lion population and increasing the number of adult males.”

However, as noted above, in order for the legislation to be effective, it must be robust. The government's Action Plan for Animal Welfare cites its intention to ensure that imports and exports of hunting trophies are “not threatening the conservation status of species abroad”. The proper interpretation of “not threatening conservation”, applying the precautionary principle, must include all species listed in Appendices I and II of the Convention on International Trade in Endangered Species of Wild Fauna and Flora and in any category other than Least Concern on

the IUCN Red List of Threatened Species (i.e. Near Threatened, Vulnerable, Endangered, Critically Endangered, and Extinct in the Wild).

This qualification is dangerous, however, because it creates a possible loophole for hunters to exploit by claiming an exemption on conservation grounds.

Instead, the forthcoming legislation should ban trophies from all species regularly imported into Britain – without exception.

Trophy hunting and poaching often go hand in hand. Hundreds of rhino horns worth hundreds of millions of pounds are known to have been traded in recent years by wildlife traffickers posing as trophy hunters. With a complete ban on trophy hunting imports, the UK government would also mitigate poaching, but a ban only on animals threatened with extinction may leave open the loophole that currently allows poachers posing as trophy hunters to import the body parts of animals including lions, elephants, and rhinos.

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

No. The trade in hunting trophies from the animals mentioned above must be banned completely, regardless of whether the animal lived in nature, was bred in captivity, or was involved in canned hunting.

Trophy hunting is always cruel, and the especially barbaric practice of “captive-bred hunting” – breeding animals in captivity and then hunting them, sometimes in enclosures – is a growing part of the industry. Conservationists believe the trade in the bones of captive-hunted lions is fuelling the poaching of wild animals. “Canned hunting” is also big business in Africa, where the private owners of large areas of land allow hunters to kill elephants, lions, leopards, rhinos, giraffes, zebras, hippos, deer, and antelope – for a fee. Because these animals are usually kept in fenced enclosures, they never stand a chance of escaping, fighting back, or surviving. Many endure a prolonged, painful death when they are injured but not killed by hunters.

Free-roaming animals are often lured with bait out of the safety of a national park into the path of an awaiting shooter, possibly leaving behind babies or a family group that relies on them. Hunters covet animals with particular traits that make them more appealing trophies, such as the darkest manes or the biggest horns or tusks. These animals are often key to the survival of their group. *National Geographic* explains that when hunters kill female elephants, it’s especially damaging to their herds because “the older females are the repositories of the herd’s collective wisdom. The matriarchs are the ones who know where to find water and food”. It is not uncommon for hunters and their escorts to encounter sleeping animals, who can be shot at extremely close range.

It is not acceptable to kill any animals for fun – wherever they are hunted – and the UK government must make this clear by banning all trade in hunting trophies from the animals mentioned above. Condoning the industry in any form supports the senseless killing of defenceless animals in a manner that often causes a prolonged and painful death.

- 3. What are the possible unintended consequences of the proposals, for example in relation to animal trophies that pre-date the legislation?**
- 4. How effective are current measures on the trade in trophies of hunting, including how they support conservation?**

Current measures do not do enough to protect animals or conservation efforts. This is clear from the fact that the UK is a significant destination for hunting trophies. Indeed, the number of trophy hunting imports to the country shows no sign of slowing and has risen dramatically in recent years, even though we are all too aware of the unspeakable suffering the activity causes as well as the potential detriment to species' wild populations.

Contrary to industry claims, trophy hunting does little to help fund conservation programmes, since the cost of employing park rangers, maintaining infrastructure, and protecting animals from poachers far exceeds the money raised by trophy hunting, once operating costs and profits have been deducted. By contrast, there is much greater potential to raise funds to support conservation from the photo and eco-tourism industries, which focus on living animals. For example, according to conservationist Dereck Joubert, the value of a dead male lion may be as little as US\$15,000, whereas the animal's value for eco-tourism could be as much as \$2 million over his lifetime. The Sheldrick Wildlife Trust has come to similar conclusions with respect to African elephants, estimating that the eco-tourism value of an elephant over his or her lifetime could be \$1.6 million.

The trophy hunting industry's claims that it benefits local communities have also been discredited: according to the Food and Agriculture Organisation of the United Nations and the International Council for Game and Wildlife Conservation, around 97% of hunting revenues stay within the hunting industry. Very few local people are employed by hunting outfitters, whereas nature tourism is far more likely to offer jobs for locals, as there are more guests and the season is longer – and it can generate 40 times as much revenue as trophy hunting. Indeed, trophy hunting contributes only a tiny fraction of both GDP and even total tourism income in African nations. And in countries with high levels of corruption, such as Zimbabwe, residents of areas where trophy hunting is permitted receive little of the money that the government is supposed to pass on to them.

In fact, trophy hunting is detrimental to the local economy, job creation, and the prospects of people living in areas where it occurs. Kenya banned trophy hunting in 1977, and in 2017, the country's tourism industry – much of it centred on its wildlife – generated a turnover of US\$2.8 billion for 429,500 direct jobs. By contrast, in Tanzania, where trophy hunting is permitted on more than a quarter of the land, it generated US\$30 million in revenue and created 4,300 direct jobs, contributing just 0.22% to the country's GDP. In 2014, Botswana's trophy hunting industry generated less than \$20 million in revenue and created just 1,000 jobs. No more than 15,500 jobs have been created in the whole of Africa by the industry. The main beneficiaries of "trophy fees" are typically officials – some of them corrupt – and overseas companies. Policy-makers, scientists, businesses, and conservation groups should work together to support sustainable economic development that creates prosperity for local communities through preserving natural heritage.

The current UK measures must be overhauled to ban the import and export of all hunting trophies.

**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?**

Such legislation would have a positive impact on animal welfare abroad, as it would prevent travel providers from giving a financial lifeline to many attractions, activities, and experiences that harm animals. It would also prevent UK tourists from unwittingly buying tickets to cruel, exploitative animal attractions abroad – at least by UK travel providers they should be able to trust – and may discourage them from visiting these attractions altogether. This would reduce the demand for these attractions and, ultimately, the number of animals imprisoned by them, with little or no impact on the UK economy.

We are encouraged to read that elephant riding will be included in the legislation and urge the government also to add facilities that hold orcas and other cetaceans in captivity for the purpose of human entertainment. Cetaceans are inherently unsuited to captivity and suffer greatly as a result.

In their ocean homes, where they belong, these far-ranging animals spend their lives covering vast distances – orcas can swim around 150 miles a day and dolphins up to 60 miles. They do this not only because they can but also because they need to – to forage and exercise. In captivity, they spend their lives imprisoned in barren concrete tanks that are approximately 10,000 times smaller than their natural home ranges. The catalogue of scientific evidence demonstrating the suffering that cetaceans endure as a result of their confinement is extensive. It includes stereotypic “pattern” swimming, listless floating, high rates of infection, tooth damage, injuries from fighting, and early mortality. Until as recently as 2019, trainers at SeaWorld – the world’s most notorious marine park, in Florida, US – used dolphins as living surfboards, standing on their sensitive backs and beaks in shows, causing them physical pain and wounds. This ended only after a veterinary report by PETA and a public outcry shamed SeaWorld into ending the practice. Yet untold numbers of marine parks around the world still force dolphins to perform in tawdry shows, often under the threat of food deprivation and other punishments. The UK has banned the exploitation of wild animals in circuses held within its borders, so why are we still selling tickets to cruel performances abroad?

We now know that cetaceans are intelligent, social, and psychologically complex animals with a long life expectancy. They live in tight-knit family groups and pass language and other learned behaviour on to their offspring – a practice that is now recognised as a form of culture. This complexity makes them especially vulnerable to psychological and physical suffering in captivity. It is therefore unjustifiable to support an industry that catches, breeds, and trades these majestic animals for tourism and exploits them for profit at marine parks.

The UK’s last dolphinarium closed in the 1990s, and major travel companies – including Airbnb, British Airways Holidays, Booking.com, and Virgin Holidays – refuse to promote these

attractions in response to customer feedback. Restricting the advertising and sale of tickets to captive cetacean facilities would have little impact on UK businesses, but it would make a lasting difference for animals.

We urge the government to include these facilities in the domestic ban on advertising and offering for sale overseas attractions, activities, or experiences that involve the unacceptable treatment of animals. Marine parks with cetaceans certainly fit this description.

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

While it is the responsibility of multiple actors – from the attractions’ owners and tour operators to tourism bodies and local governments – to ensure that animals are not harmed or cruelly treated in the tourism industry, PETA warns that whenever animals, particularly wild ones, are used for human entertainment, suffering is inevitable and the precautionary principle must be adopted. This means that relying on these actors to conduct welfare audits and inspections is not enough to protect animals, whose needs cannot be met in captivity and whose capture, breeding, trade, and exploitation for entertainment cannot, on principle, be condoned. Certain activities and attractions – such as those involving elephant rides and those which hold cetaceans captive for entertainment – are inherently cruel, with mountains of evidence available to support this. The government must ban their promotion and sale altogether. The government should also consult with animal welfare experts to audit the tourism industry and ensure that these and other cruel animal attractions are included in the legislation – with a view to reviewing it and adding attractions as more evidence of animal suffering becomes available.

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