

Written evidence submitted by FOUR PAWS UK (AAB0018)

FOUR PAWS is the global animal welfare organisation for animals under direct human influence, which reveals suffering, rescues animals in need and protects them. As experts in animal welfare we would like to respond to this call for evidence with our own research, knowledge and expertise on these issues raised.

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

FOUR PAWS UK are calling on the Government to bring in a total ban on trophy hunting imports, as are 85% of voters. This 'partial' ban currently being considered leaves out numerous species including the Cape Buffalo (one of Africa's Big Five), a species of zebra and reindeer. Even worse, this ban would allow the major loophole of allowing canned lion hunting to persist, something even mainstream hunters disapprove of!

This Government proposal that is specific to endangered animals only is not a ban. At best it represents little change to the current system. At worst it opens the door to shooting critically endangered species such as black rhinos and polar bear. We must ensure this ban is comprehensive in scope with no provisions for exceptions, such as trophies hunted under a supposed 'conservation enhancement exemption'. A similar 'conservation enhancement' principle was adopted in the US and led to several black rhino trophies being imported. When this began, there were approximately 5,000 black rhinos in the world. Now, there are currently a little over 3,000. We can no longer ignore the direct link between trophy hunting and iconic species decline.

As our lives are slowly returning to some normality following the peak of the pandemic, we were shocked to discover that not even national lockdowns could stop the UK importing hunting trophies of endangered and vulnerable species. As travel bans were being implemented, we saw iconic species like the endangered African elephant and vulnerable polar bear shipped from overseas after being slaughtered in a blood sport. In 2020 alone, hunting trophies from four lions, three elephants and one polar bear were imported into the UK.

The public want this ban, not a weak piece of legislation with loopholes that will do little to end this barbaric blood sport. A new opinion poll by Campaign to Ban Trophy Hunting shows that 85% (up from 75% in 2019) of voters agree on an immediate ban on trophy hunters bringing back trophies of wild animals to the UK, regardless of the vulnerability of the species and if a proportion of funds are donated to 'government conservation plans'. Conservative voters in particular have exhibited growing support for the ban, with a 21% increase over the last two years from 68% to 89% (from a polling group of 1,013 adults).

Our own Prime Minister, Rt Hon Boris Johnson MP, has described the practice of killing animals such as elephants and lions and importing their body parts as 'trophies' as barbaric, with party support from the environment minister Lord Goldsmith and Sir Roger Gale MP. It is clear that the British public want this

archaic practice to stop, and we hope that with this news our Government will see that anything other than a total ban of the import of hunting trophies is nonsensical.

At least 60 lions have been killed by British trophy hunters since the death of Cecil in 2015 and we want to ensure the UK are no longer complicit in this barbaric sport. The Conservative Government has promised to ban trophy hunting for several years in their manifesto and public pledges but as of yet have failed to implement a total ban on imports/exports of hunting trophies.

If a ban is introduced that is limited to endangered species only, then it means that species listed as vulnerable or near threatened by the IUCN Red List will not be included in this ban. Therefore lions, as well as other iconic species such as leopards, giraffe, and hippopotamus will still be allowed to be imported into the UK as they are all only classed as vulnerable conservation status.

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

FOUR PAWS UK believes no wild animal should be hunted and killed, in any location, for the purpose of entertainment and “sport”.

However, with high profile cases like the death of Cecil the lion and most recent death of Mopane, a lion again killed with the cruel bow and arrow method like Cecil, in Hwange National Park in Zimbabwe. Deaths that occur directly on “protected” land make a mockery of the work of conservation groups worldwide and have a huge impact on local vulnerable lion populations. Hunters will specifically target males and pride leaders as “desirable” targets, which would leave a pride without a lead male, new males moving into the territory and the almost instantaneous killing of all cubs fathered by the now dead male. This will decimate already low numbers of lions and directly threaten the survival of their species.

Animals such as lions that are often associated with “canned hunting” activities should also be included in the same proposed ban. Although these animals are bred in captivity, they are still encouraging a barbaric “sport” and also facilitate the illegal wildlife trade of valuable materials like lion bone and “lion wine” that are sought after for traditional Asian medicine.

Currently up to 12,000 lions are bred in captivity for commercial purposes. Many are used in exploitative tourism interactions, such as cub petting and ‘walking with lions’ opportunities. As the lions age and mature, they are subject to a short and unethical lifespan of canned hunting for their trophies and/or the legal export of lion bones to Southeast Asia for traditional medicine. FOUR PAWS released its [Vicious Cycle report](#) in March 2021, highlighting serious welfare concerns at breeding facilities – not only of the animals being kept, but in some instances workers, too.

In May 2021, South African Minister Barbara Creecy of the Department for Forestry, Fisheries and the Environment (DFFE) announced plans to put an end to captive lion breeding in South Africa once and for all. aFOUR PAWS sincerely welcomes this announcement but understands that it will take some time before this legislation is not only put in place, but the current breeding facilities are addressed, and animals are prevented from further breeding and suffering. With the canned hunting industry so closely linked to the illegal wildlife trade of animal parts, we expect that it will not be long before we see

canned hunting boom in another country on the continent, so therefore it is essential that the UK includes animals from captive breeding in a trophy hunting import ban. Between 2016 and 2020, 19 hunting trophies were imported into the UK from animals bred in captivity. The UK is currently complicit in this cruel trade, and we must honour our commitment to retain high animal welfare standards and set a positive example to other nations.

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

FOUR PAWS UK believes that the Government should implement a similar ban as we have with the Ivory Act, that prevents the resale and essentially the promotion of trophy hunting activities, and instead lend its voice as animal welfare leaders to promote ecotourism activities instead. Exceptions relating to inherited items, or those already in one's possession can be introduced, however no further trade can be permitted. Like with the ivory trade, this new legislation would directly impact and hinder the group trade of trophy hunting activities and hunting trophy trade.

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

Current CITES classification

There is confusion in the CITES classification system. There are occasionally live animals classed as hunting trophies, and there are hunting trophies classed as items for personal consumption, commercial trade or educational and other purposes. The failure of CITES to extend the same restrictions on the trade of species listed in its appendices to 'specimens' acquired through trophy hunting is highly problematic and needs to be addressed. Currently the trade in Appendix I species must only be authorised "in exceptional circumstances". However, the issuing of permits for hunting trophies of these species are issued as a matter of routine. The CITES definition only covers legally-obtained trophies from species that the CITES treaty covers. A definition should be found that covers all killing of animals for trophies.

Trophy hunting is the hunting of an animal for 'sport' rather than to satisfy a perceived human need where one of the objectives is acquiring a body part – the trophy - the acquisition and display of which denotes and celebrates the hunter's kill. The trophy may then be submitted for entry into industry Records Books which recognise and promote the killing of animals with the biggest trophies through measurement systems that set minimum scores. The trophy may also be put forward for industry awards for collections of animal trophies acquired according to region, type of animal and type of weapon.

There are serious failings in the CITES record-keeping processes. In many cases the country of origin is listed as unknown, including that of Appendix I species or species classed as critically endangered by IUCN. There are a very large number of discrepancies between the numbers of trophies exported and imported in the same data fields. Items such as tusks are sometimes listed numerically and sometimes by weight. Descriptions are sometimes clearly wrong eg references to 'lion horn'. Sometimes the source

is stated – e.g. wild animal, captive bred animal, ranched animal – and sometimes it is not. The distinctions between some source codes are not clear e.g., categories C (captive) and R (ranched).

In some cases, trophy hunting is being used as a ‘cover’ for illegal wildlife trafficking. This has previously been determined in court cases which showed that a large proportion of rhinoceroses were being ‘trophy hunted’ for their horns by Vietnamese traffickers. A significant proportion of rhinos are now being killed by Chinese ‘trophy hunters’. Animal skins (eg Appendix I Nile crocodiles) and bear gall bladders are also being classed as ‘hunting trophies’ when it is very likely that the trophies have been acquired for commercial purposes. This means the exclusion of hunting trophies from the provisions of CITES on the grounds that trophy hunting is a ‘non-commercial’ activity is incorrect and makes enforcement problematic as the above scenarios indicate. Trophy hunting is a multi-million dollar industry, with hunters being charged tens of thousands of pounds for hunting expeditions.

Britain is a significant transit point for the shipment of trophies from the country of origin en route to a third country. In some cases, this is because of specialised taxidermy services that are used in Britain by foreign trophy hunters. Ports such as Gatwick airport are major transit points for the international shipping of hunting trophies. The enforcement system needs to take this into account.

Conservation claims

FOUR PAWS UK believes that the claim that trophy hunting supports conservation efforts is false.

The trophy hunting industry gives awards to those who have killed the most animals in the most countries, while its Records Books encourage hunters to shoot the biggest and strongest individuals. Outfitters (hunting companies) promote themselves as being the most successful in securing record-size trophies for their clients. These animals score the most ‘points’, winning the hunter a place in coveted annuals. Trophy hunters seek the biggest and most impressive trophies to exhibit in their trophy rooms or private museums. The size of elephant tusks and other animals’ horns is now getting smaller. 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. This is a fate that could befall all hunted species by virtue of the targeting of large numbers of large animals in order to win prizes and enter into industry Records Books, populate trophy rooms etc.

Trophy hunting is detrimental for the local economy, for job creation and for the prospects of people living in areas where trophy hunting occurs. Kenya banned trophy hunting in 1977. In 2017, tourism in Kenya - much of it related to nature tourism – generated a turnover of US\$2.8 billion for 429,500 direct jobs. In Tanzania, by contrast, trophy hunting generated US\$30 million in revenue and created 4,300 direct jobs off 200,000km² of hunting areas. More than a quarter of Tanzania’s territory is given over to hunting concessions. Yet they generate just 0.22% of the country’s GDP. In 2014, Botswana’s trophy hunting industry generated less \$20m in revenue and created just 1000 jobs. No more than 15,500 jobs have been created in the whole of Africa by the industry. The population of the main southern African countries where trophy hunting takes place is 150 million. The main beneficiaries of ‘trophy fees’ are often officials, some of them corrupt, and overseas companies. Studies show that nature tourism creates more jobs than the trophy hunting sector, that the jobs pay more, and they are more likely to be year-round rather than seasonal labour

If a complete ban is not feasible, then at the very least, a ban should be introduced on imports and exports of trophies derived from species listed on the CITES Appendices and/or EU Wildlife Trade Regulation Annexes, and species classified on the IUCN Red List as threatened (Vulnerable, Endangered, Critically Endangered), Near-Threatened, or Data Deficient. This would at least send a clear signal that the UK does not consider it appropriate for animals from species recognised by the scientific and international conservation community as being in need of protection to be killed for sport, while also protecting those species about which we know little.

If trophy hunting is beneficial to conservation, as its supporters claim, it is difficult to understand why the conservation status of the majority of species targeted by hunters is poor and/or deteriorating. An analysis of the 114 species hunted in South Africa – the country where the majority of British trophy hunters visit – shows that 100 of them are in IUCN classifications above ‘Least Concern’, their populations are decreasing or unknown, or they are classed in CITES Appendix I or II – both of which reflect the fact that the species is vulnerable to some degree. If one were to adopt the precautionary principle, therefore, a hunting ban would apply to 9 in every 10 species hunted for sport and trophies.

A comprehensive US Congressional study reviewed dozens of scientific studies found little if any evidence of trophy hunting’s purported conservation benefits. Species popular with trophy hunters are all in decline, and trophy hunting is contributing directly to their ongoing decline.

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?

FOUR PAWS UK promotes animal-friendly travel through its [Travel Kind](#) campaign. As part of our advice to travellers, we recommend 12 top tips for interacting with animals on holiday, from wildlife to community and domesticated animals.

Wild animals are not domesticated, they have simply been trained to respond to human commands usually as a result of cruel and abusive behaviour that ensures they are fearful and obedient of humans. This is no way to live.

A ban on selling and advertising overseas attractions should encompass:

- Wild animals in circuses or other performance shows e.g. orangutan boxing, elephant painting
- Selfies and physical interactions with wild animals
- Riding or bathing with wild animals, particularly elephants
- Dolphinarium and other aquatic based shows

By introducing this ban, we will be helping to remove funding and the popularity of exploiting wild animals. Many are taken from the wild and cruelly abused to perform and do what humans require, and as a result of the reduced tourism activity in this area we will essentially see far fewer animals being poached and suffering as a result of the entertainment industry.

By introducing this ban we will also see more ethical travellers and tourism companies which will directly impact the industry and send a demand signal for more ethical animal experiences, and much more financial support towards sustainable ecotourism initiatives. We would also see a reduction in the

illegal wildlife trade and smuggling of live animals and their parts which are often directly associated with animals in private keeping or “zoo”/animal park institutions.

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

FOUR PAWS UK believes that the responsibility of animal welfare in tourism falls with all of us.

- Tour operators and travel companies should be setting a gold example to other countries and their customers to not sell or promote cruel animal activities or have financial agreements/partnerships with them. Hundreds of companies worldwide have already signed a pledge to eliminate elephant riding activities from their itineraries as a result of the World Animal Protection campaign, however still so many sell trips that involve animal exploitation including Trailfinders selling elephant rides and Expedia selling and promoting dolphinarium. All travel companies must have an animal welfare policy. These companies also have a responsibility to communicate animal-friendly travel advice to their customers and ensure that the third-party companies they use in tourist destinations adhere to their company’s policy on animal welfare.
- Customer/travellers should not support and encourage them and should take a personal pledge to Travel Kind in their lives. FOUR PAWS UK currently has over 1,000 supporters who have taken the [Travel Kind Oath](#). NGOs should promote this kind of messaging far and wide to ensure more people adopt similar personal behaviours.
- National governments in tourist destinations should not permit cruel activities like circuses, animal shows, selfie opportunities and elephant riding/bathing experiences. This will send a clear signal to local citizens who exploit wildlife for personal profit.
- The UK Government should not permit the advertising and sale of such activities and make efforts to promote the Travel Kind ethos with the British public and support ecotourism and sustainable alternatives.

September 2021