

Submission to the Environment, Food and Rural Affairs Committee inquiry into the proposed Animals Abroad Bill

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This submission is prepared on behalf of the IUCN Sustainable Use and Livelihoods Specialist Group (IUCN SULi) - an international network of over 300 volunteer experts in sustainable use. SULi is a Specialist Group that sits within IUCN's Species Survival Commission, the same Commission that houses the IUCN Red List of Threatened Species, the recognized global authority on the conservation status of species worldwide. IUCN is the world's biggest conservation organization comprised of approx. 1400 members including government and non-governmental organisations, Indigenous Peoples and local community organisations; business associations; and academic institutions. The UK Government is a member of IUCN as are many UK-based environmental organisations and thus – in theory given this is a condition of membership – share and support the objectives of IUCN.

IUCN's Position on Trophy Hunting

IUCN does not have a specific policy position on trophy hunting. However the following policy positions are directly relevant to trophy hunting.

- 1) IUCN's position is that "use of wild living resources, if sustainable, is an important conservation tool because the social and economic benefits derived from such use provide incentives for people to conserve them" as outlined in IUCN's [Policy Statement on Sustainable Use of Wild Living Resources](#), adopted by IUCN Members at the 2nd World Conservation Congress in Amman in October 2000. It recognises that "trophy hunting can be a form of sustainable use, and if conducted according to the [Guiding Principles on Trophy Hunting as a Tool for Creating Conservation Incentives](#) developed by the Species Survival Commission (SSC), can provide positive benefits for conservation"
- 2) IUCN "supports the philosophy and practice that on state, communal and privately-owned land in southern Africa the sustainable and well-managed consumptive use of wildlife makes a contribution to biodiversity conservation", and "accepts that well-managed recreational hunting has a role in the managed sustainable consumptive use of wildlife populations," ([Recommendation 3.093](#), adopted by IUCN Members at the 3rd World Conservation Congress in Bangkok in November 2004)

- 3) IUCN does *not* support moving species outside their native ranges for the primary purpose of trophy hunting – as set out in its Position Statement on Translocation of Living Organisms. Recommendation 3.093 above also condemns “the killing of animals in enclosures or where they do not exist as free-ranging.” IUCN does not, therefore, support so-called “canned hunting”.

IUCN SULi does not determine IUCN policy. Its members are individuals acting in their personal capacities not IUCN member *organisations*. However all the IUCN Commissions, and the Specialist Groups within them are broad and active networks of scientists and experts providing IUCN and its Members with sound know-how and policy advice to drive conservation and sustainable development. Within this context, IUCN SULi’s parent Commission – the Species Survival Commission – has produced a set of guiding principles on trophy hunting as a tool for creating conservation incentives (<https://portals.iucn.org/library/sites/library/files/documents/Rep-2012-007.pdf>). These principles build on IUCN policy and consider that trophy hunting programmes are likely to contribute to conservation and to the equitable sharing of the benefits of use of natural resources when they incorporate the following five components:

- (1) Biological Sustainability,
- (2) Net Conservation Benefit;
- (3) Socio-Economic-Cultural Benefit;
- (4) Adaptive Management: Planning, Monitoring, and Reporting; and
- (5) Accountable and Effective Governance.

The Species Survival Commission does not support or condone trophy hunting activities that are unsustainable; adversely affect habitats; increase extinction risks; undermine the rights of local communities to manage, steward, and benefit from their wildlife resources; or foster corruption or poor governance.

Within the SSC, and building on the Guiding Principles, SULi has developed a briefing paper - in response to a proposed EU ban on trophy imports in 2016 - regarding issues to be taken into account when considering restriction of imports of hunting trophies ([IUCN Trophy Hunting Briefing Paper rev2019](#)). This briefing paper makes 4 key recommendations in this regard:

Any decisions that could restrict or end trophy hunting programmes (of which a ban on imports is one) are:

- i. based on careful and sound analysis and understanding of the particular role that trophy hunting programmes are playing in relation to conservation efforts at all levels in source countries, including their contribution to livelihoods in specific affected communities;
- ii. based on meaningful and equitable consultation with affected range state governments and indigenous peoples and local communities and do not undermine local approaches to conservation;

- iii. taken only after exploration of other options for engaging with relevant countries to change poor practice and promote improved standards of governance and management of hunting;
- iv. taken only after identification and implementation of feasible, fully funded and sustainable alternatives to hunting that respect indigenous and local community rights and livelihoods and deliver equal or greater incentives for conservation over the long term.

These are the same recommendations that we make to the UK Government in the context of the current discussions and proposals in the Animals Abroad Bill.

Response to specific questions relating to trophy hunting in the current call for evidence

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

- **No. Trophy hunting is not a threat to endangered species (or indeed any species) and so restricting the import and export of hunting trophies will not support conservation.** The IUCN Red List of Threatened Species is the global authority on conservation status. Many hunted species fall into the "Least Concern" category. Some species (particularly the more iconic lions, leopards, elephants which are of greatest concern to the general public) are in more endangered categories - but **trophy hunting is not identified as a major threat to any of these species at the global level** (unsustainably high trophy offtakes have negatively impacted some local populations of lion and leopard, but at the *species* level it is not a threat).
- At a country level Namibia (which has an active hunting industry) and Kenya (which banned hunting in 1977) provide an interesting contrast. Wildlife populations in Namibia are on a steep upward curve. In Kenya they are on a downward curve. If trophy hunting were a threat one would expect to see these two positions reversed.
- Not only is trophy hunting not a major threat, for some species it has been a **major positive force for population increases and species recovery**. Recovery of white rhino from near extinction can largely be attributed to introduction of limited hunting and the financial incentive this provided private landowners to protect them.
- The major threats to all of the key species usually discussed in the hunting debate are: **habitat loss, loss of prey, retaliatory killing by local people and poaching**.
- **Trophy hunting can actually help reduce these major threats, while removing trophy hunting without viable alternatives in place will exacerbate the threats.**

How does trophy hunting reduce threats?

- **It provides a financial incentive to keep land under wildlife.** In African countries with trophy hunting, the land set aside for hunting far exceeds the land protected as National Parks. It includes private and community-owned land. If there was no trophy hunting, there would be no

incentive to keep the land under wildlife and it would likely revert to agriculture or livestock, increasing the far greater threats of habitat loss, prey loss and conflict. That land is habitat not just for the hunted species, but also for many non-hunted species.

- **It can provide an incentive to local communities to tolerate dangerous wildlife** such as lions and elephants and not to resort to indiscriminate killing in revenge for loss of livestock, human death and injury, loss of crops etc
- **It makes a financial contribution to state wildlife agency budgets**, supporting their investments in conservation, protected area management and anti-poaching
- **It makes direct investments in anti-poaching.** Bulye Valley Conservancy in Zimbabwe is a good example. It is a private conservancy but it houses Zimbabwe's national rhino herd because it is able to provide better protection than the National Parks. Anti-poaching costs run to c \$1.5 million/year. All of the funding for this comes from hunting (mainly of lions). The rhino themselves generate no income – they are not hunted and there is no tourism as the conservancy is too remote to make this viable.
- Banning trophy imports will not in itself remove trophy hunting but it is likely to have one of two possible consequences. Either it will undermine the viability of the industry as hunters reduce their activities if they are not able to bring the trophies home; or it will not affect hunters who want to hunt regardless of whether or not they can bring the trophy home, but it will massively decrease the value of each hunt and therefore the revenue flowing back to conservation, since the trophy fee forms a large part of the overall cost of the hunt. Either way less money will flow to conservation.

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

Yes. If decisions to ban trade in animal trophies are based on a concern for conservation then they should only be implemented when it is clear that there is a negative conservation implication. It is clear that not all trophy hunting operations are well managed and there are certainly localized population declines. In these cases it is legitimate to subject the operation to considerable scrutiny. However the entire industry should not be penalized in order to account for the cases where standards are poor. Equally trophy hunting that does not make a contribution to conservation (for example hunting of captive animals in enclosures) should be subject to stricter rules – and indeed the majority of professional hunting associations as well as conservation organizations would support a total ban on this kind of hunting. As noted in the SSC Guiding Principles, hunting that is unsustainable; adversely affects habitats; increases extinction risks; undermines the rights of local communities to manage, steward, and benefit from their wildlife resources; or fosters corruption or poor governance should not be supported. Overall we refer EFRA back to the recommendations in

the “Informing Decisions” briefing paper that any decisions that could restrict or end trophy hunting programmes should be:

- i. based on careful and sound analysis and understanding of the particular role that trophy hunting programmes are playing in relation to conservation efforts at all levels in source countries, including their contribution to livelihoods in specific affected communities;
- ii. based on meaningful and equitable consultation with affected range state governments and indigenous peoples and local communities and do not undermine local approaches to conservation;
- iii. taken only after exploration of other options for engaging with relevant countries to change poor practice and promote improved standards of governance and management of hunting;
- iv. taken only after identification and implementation of feasible, fully funded and sustainable alternatives to hunting that respect indigenous and local community rights and livelihoods and deliver equal or greater incentives for conservation over the long term.

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

The possible unintended consequences for conservation have been highlighted above. There are further unintended social and political consequences however. For governments in trophy hunting countries, the UK government is effectively sending a message saying it doesn't trust their ability to manage their own wildlife nor does it believe in the multilateral CITES treaty. And there are unintended consequences for the local communities that live alongside wildlife and manage it on their land and in many cases actively decide to promote trophy hunting on that land in order to generate revenue. Measures taken by remote governments to influence how wildlife is managed undermine the human rights of those communities to determine their own livelihoods and to manage their own resources.

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

Restrictions on the import of hunting trophies to the UK from endangered species are covered by the Control of Trade in Endangered Species Regulations 2018 implementing the Convention on International Trade in Endangered Species (CITES).

There are actually very few imports of hunting trophies into the UK so the proposed measures will actually affect few individual animals while at the same time diverting attention and funding from the real threats to

conservation which would certainly benefit from greater prioritisation. SULi recommends the UK govt does the following:

1. Rather than an outright ban, revise trophy import criteria to enhance conservation. This would support responsible hunting which benefits conservation, while actively working to prevent imports from canned hunting.
2. Invest long-term, significant funding to help develop and implement viable alternatives for trophy hunting areas, particularly in light of COVID-19 impacts;
3. Provide long-term, significant funding to address the real threats facing lions and other species – particularly habitat loss, which also affects human and planetary health.

Previous submissions of evidence to the UK Government

It is noteworthy that the two years ago UK Government announced that prior to any decision being taken regarding the banning of trophy imports, a full consultation would be held and evidence assessed. In January 2020 many SULi members as well as local community organisations and range state governments submitted evidence in response to the call. To date we have seen no synthesis of DEFRA's findings based on the evidence submission and on which, in theory, the provisions of the Animals Abroad Bill should be based. It is strongly suggested that the EFRA committee reviews the evidence already submitted to DEFRA as part of its inquiry, in addition to further evidence submitted to this specific call.

It is also noteworthy that a considerable amount of misinformation is spread about trophy hunting by non-scientific lobby groups. Despite this, a recent IUCN-SULi survey of over 2000 members of the British public indicates that the opposition to trophy hunting is not so clear cut as these lobby groups imply. Notable among the findings is that IF a trophy hunting ban DECREASED overall threats to wildlife, then nearly two-thirds of UK respondents would be supportive but less than half would support a ban if it increased threats to conservation – which our evidence strongly suggests it does. Furthermore, Nearly two-thirds of respondents said that regarding a potential UK trophy hunting import ban, it was important to consider the impact on affected communities in the relevant countries. The findings of the survey are available at:

<https://twitter.com/IUCNSULi/status/1440065833150021633>

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