

Written evidence submitted by Jamma International (AAB0052)

Response to the Call for Evidence on the import and export of hunting trophies in the Animals Abroad Bill.

Jamma International (Jamma) as an International Conservation Charity appreciates the opportunity to give evidence in respect of the proposed Animals Abroad Bill. Jamma as an organization, and before its creation the trustees in their private capacity, have for many years been involved in the support of wildlife conservation and associated community upliftment and empowerment projects in Africa.

Response to questions:

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

No. Jamma is firmly of the opinion that the UK government should be working with CITES and bilaterally with trophy hunting countries to help them manage governance issues. Banning the export and import of hunting trophies will be immensely counterproductive for the conservation of endangered species, and will enable large-scale poaching. This was exemplified in Zambia in 2013 when trophy hunting was temporarily banned, and then subsequently reinstated due to the significant loss of conservation revenue. It provides a good example of the extensive protection and conservation work performed by hunting operators in their respective concessions.

Ecotourism, in the form of photographic safaris, is seldom practical nor feasible in many remote conservation areas. Most of these areas are all too often in the process of trying to recover from the ravages of civil war or other similar disasters. There is typically no infrastructure in these places, there is very limited wildlife as they have normally been heavily poached and security is a consistent challenge.

Hunters are typically a more resilient type of tourist; they relish the idea of remote areas and don't generally need all the luxuries and constant exposure to wildlife and scenery that can be photographed. Hunting clients are also surprisingly 'low impact'. The few animals they have come to harvest are normally part of a carefully planned offtake programme designed by local conservationists. The nature of trophy hunting is such that the conservation area can earn a large amount of income with the lower carbon footprint and pressure of only a few guests. The information spread by anti-trophy hunting campaigns states that trophy hunting is a threat to wildlife species. This is false, as having trophy hunting in an area is not an indication of threat. Well-managed trophy hunting will positively impact wildlife and communities.

It would seem counter intuitive for the UK government to support a ban on trophy hunting. The UK may not be home for a significant group of trophy hunters. However, the UK government is committed to providing international leadership in protecting and improving international biodiversity and undertaking international action to protect endangered species. If the UK government denies people the right to bring back trophies from their hunts, they will be denying many marginal conservation areas in Africa and other places an opportunity to fund much needed conservation activities and support local communities. We believe that the UK will thereby risk leading the world in a dangerously wrong direction with the loss of a unique opportunity to create financing for the support of wildlife and community upliftment. Many conservancies and other

conservation areas are 100% reliant on trophy hunting to make them sustainable. We see this as a clear case of domestic policy threatening the conservation of species abroad.

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

Canned hunting and the hunting of captive bred animals should not be seen as hunting at all, let alone trophy hunting. While there may be a place for the harvest of captive bred animals, this type of activity needs to be better understood and monitored. Today it only gives hunting a bad name.

Whether the hunting area is fenced should not automatically cause different rules, as we would like to emphasise that many of Africa's National Parks are indeed fenced. While antelope populations have in average decreased by approximately 60% across all parks over the last 40 years, animal populations in hunting areas are generally faring much better. This is especially true in South Africa. The idea that a fenced area somehow leads to massive animal welfare problems across the African National Parks is ludicrous. It is made necessary by the fact that scant traditional wildlife migrations still take place and where they do, they are inhibited by human barriers of different forms. Fenced areas are a result of human population expansion into wildlife habitat and this habitat decline will naturally cause stress to wildlife. The answer to the issue is to stop habitat encroachment, not hunting. Our concern is that hunting in large, fenced areas or from re-established wildlife populations will now be termed 'canned hunting' to inhibit hunting as a tool for conservation. Never was there a stronger argument for hunting than inside large, fenced areas where predators are in short supply.

A lot more attention should be given to the illegal wildlife trade. Making things problematic for law abiding hunters who are supporting conservation and community upliftment is easy. Apprehending people who are genuinely involved in illegal trade is a lot more challenging and that is where the focus should be. The process for importing and exporting trophies should be made as easy as possible for hunters and they should not be treated with bias.

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

[A September 2021 survey](#) from the IUCN's Sustainable Use and Livelihoods Group collected the opinions of 2,164 UK adults around trophy hunting. It showed that 65% of the British people consider it important to consider the impacts on affected communities when deciding on a potential UK import ban on hunting trophies. An unintended consequence of the proposal is that communities will have significant negative impacts on their livelihoods and rights if they are unable to sustainably utilise their own natural resources.

As stated in the answer to Question 1, other unintended consequences will be the negative implications for conservation in African countries. There seems to be a broadly accepted myth that there must be a viable alternative to trophy hunting. In a well-researched paper published by the Luc Hoffmann Institute entitled 'Diversifying local livelihoods while sustaining wildlife' two quotes stand out. Firstly on the significance of trophy hunting as an income generator for conservation: *"For years now, trophy hunting and tourism have been the two main ways for many communities across Africa to revenue from wildlife. The benefits generated by these activities have provided significant conservation incentives for people to share land with sometimes dangerous wildlife. The result has been large-scale conservation and often dramatic restoration of wildlife populations and habitat[1]*

in many areas.[2]” The same paper which explored a myriad of alternatives to trophy hunting then states in conclusion: *“Overall, there are few really novel ways of generating income found in this study – familiar forms of conservation incentive still dominate, and there are no silver bullet solutions.”*

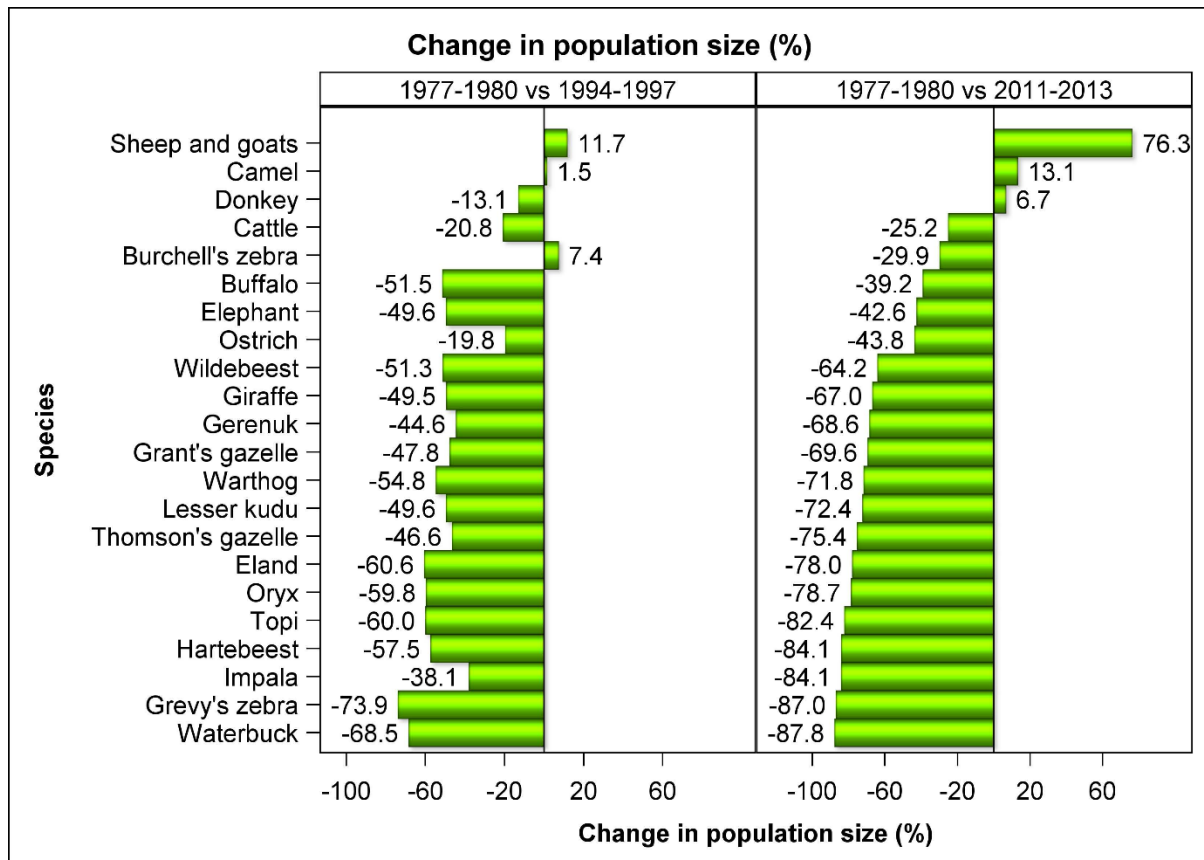
It is the opinion of conservation experts within Jamma that the agencies and organizations supporting a ban on the import and export of hunting trophies do not understand the reality of conservation in the developing world. Their call for a ban seems to be based in a very emotional response to the ‘idea’ or ‘culture’ of trophy hunting and is not founded in reality. There is no understanding of what such a ban would mean for many conservation areas and the communities associated with them. Real evidence that well-managed trophy hunting somehow has a negative effect on conservation does not exist. Evidence of the benefits of trophy hunting for conservation particularly in Africa are well documented and have been for some time. A quick Google search will verify this, <https://doi.org/10.1111/j.1469-1795.2006.00034> is one recent example. [A recent Survival survey](#) in September 2021 showed that only 39% of the UK public would support bans on trophy hunting if it negatively affected marginalised communities, and only 42% of respondents would support a ban which increased overall threats to wildlife conservation.

It seems that ‘pro ban’ arguments for the most part are put forward by people with a clear interest in assuaging their own consciences. This seems to be mostly grounded in a fanatical argument around the ethics of hunting animals. There is typically a constant reference to the so called ‘debate’ around the benefits of trophy hunting when it is not actually a debate. Practical conservationists that have worked on the ground with well managed trophy hunting will concur that it benefits conservation and communities. The ethics of hunting can be debated endlessly. The ethics around the slaughter of domestic livestock is a far more urgent, relevant and complex issue in our society. The bottom line is trophy hunting is a legal activity practiced by individuals who see it as intrinsically part of their culture and heritage. It is allowed, indeed encouraged by government conservation agencies and communities who are using their own resources legally, and in their minds, ethically.

The very real issues of habitat loss, expanding human populations, poverty and illegal hunting are issues that are either too much of a political minefield or too large and complex for most governments, let alone individuals to have an impact on. The ban on trophy hunting is an attractive ‘easy win’ for marginal groups and individuals hounded by a conscience that prickles at the fact that very little has been done about actual conservation issues. To quote Richard Leaky (Currently Chairman of the Kenya Wildlife Service) on this group of people: *“It’s easier to scream in outrage over the killing of a highly charismatic lion with a cute name, sign a Change.org petition, and move on to posting selfies, than it is to actually investigate the deep forces behind the African wildlife holocaust.”*

Much is made of finding alternatives to trophy hunting. What is often not considered is that in many places where hunting has already been banned alternatives have not been found. Kenya is a prime example and again we quote Richard Leaky who has first-hand experience of this: *“If you fly over parts of Tsavo today—and I challenge anyone to do so, if you have the eyes for it – you can see lines of snares set out in funnel traps that extend four or five miles. Tens of thousands of animals are being killed annually for the meat business. Carnivores are being decimated in the same snares and discarded. I am not a propagandist on this issue, but when my friends say we are very concerned that hunting will be reintroduced in Kenya, let me put it to you: hunting has never been stopped in Kenya, and there is more hunting in Kenya today than at any time since independence. (Thousands) of animals are being killed annually with no control. Snaring, poisoning, and shooting are common things. So when you have a fear of debate about hunting, please don’t think there is no hunting.*

Think of a policy to regulate it, so that we can make it sustainable. That is surely the issue, because an illegal crop, an illegal market is unsustainable in the long term, whatever it is. And the market in wildlife meat is unsustainable as currently practiced, and something needs to be done."



The graph above clearly illustrates what happened to wildlife populations when legal hunting was banned in Kenya in 1977.

Question 4: How effective are current measures on the trade in trophies of hunting, including how they support conservation? The experience of conservation practitioners within Jamma and amongst the local and international conservation agencies Jamma supports, is that trophy hunting has been and remains a key tool in conservation efforts. Below are examples and case studies of where Jamma has experienced that current trade in hunting trophies provided support for both conservation and community livelihoods.

Case study – Namibia:

Jamma and its trustees have been actively involved in the Namibian conservancy movement since 1997. International trophy hunting together with photographic tourism form the backbone of income generation. There are currently 86 registered conservancies covering an area of 166,045 square kilometres. The human population in these conservancies stands at 227,941 persons. Most of these conservancies have no photographic tourism potential at all, and the income earned by those conservancies that do cater to photographic tourism is seldom big enough to cover their operating expenses let alone make distributions to the members. Income generated by trophy hunting is therefore of utmost importance to almost all of Namibia's communal conservancies.

The trophy hunting in Namibia is well regulated. The principles of sustainable use of natural resources are entrenched in law and form a key component of Namibia's plans for rural economic development. Namibia is a member of CITES and yearly wildlife censuses take place, which form the basis for the hunting quotas. For the most common species there are quotas for trophy hunting, own use hunting and live capture. The number of animals allowed for own use by far outnumbers those made available for trophy hunting. However, it is the trophy hunting that generates the bulk of the income. Trophy hunting quotas for species like cheetah, lion, elephant, rhino and leopard are set in a different way with specific conservation and management aims for each species. There is no reason to believe that trophy hunting is a threat to the survival of any of these species in Namibia. Quite the opposite. Trophy hunting, through its ability to generate income, is an important tool for managing them and securing the continued existence of viable populations.

We refer to the vast number of scientific research reports evidencing the wildlife conservation benefits of Namibia's national policy of sustainable use of natural resources.

Case study – Mozambique:

Jamma is currently in negotiations with the authorities in Mozambique for contracts to manage two very large conservation and wildlife utilisation areas, namely Coutadas 4 and 13 with a combined size of approximately 10,000 square kilometres. These areas are very remote, do not have much of a local economy, basically no infrastructure and badly depleted to non-existent wildlife populations. Jamma intends to build a wildlife-based economy in these areas and is prepared to invest approximately US\$ 10 million to achieve this. Our assumption is that we shall over time be able to recover our investment. This serves to confirm that we have been able to establish a sustainable wildlife based local economy. It is anticipated that the payback period will be at least 30 years. Trophy hunting will be the only income source but can only commence once the wildlife populations have been adequately rebuilt. This will take 8-10 years. If trophy hunting is restricted, for example by the UK government deciding to ban the import of trophies, the revival and conservation of these areas will not happen. It is our long-term aim that these Coutadas shall once more be home for the Big 5 and thereby become a destination also for photographic tourism. However, this income will not be sufficient to replace that generated by trophy hunting.

For further information about Coutadas we refer to the Mozambican conservation laws and regulations. Other Coutadas have already been revived and through trophy hunting turned into great conservation successes.

General

We at Jamma are confident we have given evidence citing our own experience and practical conservation examples. We are not arguing that trophy hunting does not need to be responsible and sustainably managed. We are also aware that better governance structures need to be in place to support this. We believe that it is in this area that the UK government should be focussing its energies and not banning the export and import of hunting trophies. Large reputable conservation organizations agree with us, the World Wildlife Fund in a policy paper for the organization entitled 'WWF Policy and Considerations on Trophy Hunting' clearly states that they consider hunting a conservation tool.

Jamma believes that the UK government should seriously consider the way its actions will in this case impact conservation in developing countries like Mozambique. A ban on the import/export of trophies would move directly against the desired goals put in place by a foreign government for conserving its natural areas. This is a very 'colonial' like snub to foreign governments intent on

conserving their wildlife and uplifting their people. Governments that are using hunting as recognized, legal and accepted tool for this purpose.

If the UK Government decides to implement this ban it should also carefully consider the many people it will be impacting in developing countries. Often these people have formed their own community conservancies, as is the case in Namibia. Now they will be denied the right to utilize their own resources in a way that benefits the whole community, because of a decision made in the United Kingdom. Has this mistake not been made enough times historically? We are not the only people who say so. In a very well-crafted and objective briefing paper on trophy hunting entitled 'Informing decisions on trophy hunting' the IUCN states *"In many parts of the world indigenous and local communities have chosen to use trophy hunting as a strategy for conservation of their wildlife and to improve sustainable livelihoods"*.

If this ban goes ahead the UK Government will be clearly undermining an international agreement by ignoring CITES. This agreement allows all countries impacted by such bans to voice their opinions on what should be an international issue. This will have unimaginable negative consequences for international conservation and the wildlife trade. Biodiversity conservation should be a global effort and not dictated by a few woefully uninformed pressure groups, who use an emotive issue like this ban to win short term political gains.

Finally, there is no doubt more work could be done to improve legislation around the trade in trophies. The government should support trophy hunting where it benefits local and indigenous communities and biodiversity conservation. It should make sure that legislation recognises these important aspects of trophy hunting and streamlines legislation so that it encourages the import of trophies which create these benefits in a sustainable way.

Question 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? This is largely dependent on how you define the unacceptable treatment of animals? If trophy hunting is included in this category, then banning the ability of people to advertise hunting opportunities amounts to the same result as banning the import of trophies. It once again puts unnecessary and unfair restrictions on an activity happening in a foreign country that constitutes an infringement on their basic rights.

Question 6: Who should be responsible for ensuring attractions, activities or experiences overseas do not cause the unacceptable treatment of animals? Not the British Government, unless we would like to go on perpetuating the injustices of hundreds of years of colonial decision making for other nations. We think this is something all British citizens would want to avoid! A British morality based in lifestyles that are luxurious compared to most of Africa or Asia should not be the benchmark for what is acceptable or not. It is just too convenient when your meat gets delivered to you by a Tesco van, in form that makes it hardly recognisable as the living animal it once was, to condemn those that must hunt for their protein. So easy to brand this as unacceptable so that our own consciences are somehow assuaged. We are basically compensating for a guilt we feel for the huge amount of disrespect and cruelty we have treated wild animals on our own island with. Successfully managing to wipe out most of our indigenous species and certainly all the large predators. The result is the most environmentally modified island on the planet. Now we want to tell other people how they should manage their resources? No, the British government and the British people don't get to decide what is morally acceptable for Africans or Asians or anyone else for that matter. The British nation has a responsibility to support local and indigenous peoples in any way possible to manage

their resources in a sustainable way the ensures the ultimate conservation of biodiversity. That's what we are responsible for ensuring!

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