

# Written evidence submitted by Humane Society International (UK) (AAB0053)

## Trophy hunting and elephant rides: Will proposed new laws be effective in tackling cruelty to animals overseas?

22<sup>nd</sup> September 2021

Humane Society International/UK is a leading force for animal protection, and part of one of the largest animal protection organisations in the world. We advocate for the humane treatment of animals, in the interests of animal welfare, public health and environmental protection, on behalf of our millions of supporters and followers both here in the UK and around the world.

We are advocating globally for an end to the inhumane, outdated and harmful practice of trophy hunting. In the UK we are supportive of the Government's efforts to end UK involvement in trophy hunting and are calling for a comprehensive ban on the import and export of hunting trophies from all animals. Our response below sets out our case against the global trophy hunting industry. We are also supportive of efforts to end the advertising and offering for sale overseas attractions, activities or experiences that involve the unacceptable treatment of animals. In our response we list a number of activities which have been shown to be harmful to animals around the world and which should no longer be advertised or sold in the UK.

Humane Society International has wildlife and conservation and animal welfare experts based around the world who would be happy to provide further evidence to the work of the committee, including:

**Dr Audrey Delsink** - Wildlife Director HSI Africa – Audrey is a biologist and registered ecologist for the council of natural scientific professions, having worked in and managed protected areas in the South African landscape for 20 years.

**Dr Teresa Telecky** - Vice President for Wildlife at Humane Society International - Teresa is a zoologist and wildlife trade expert who has worked for the Humane Society family for 30 years.

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

It is important to note that the government's proposals have not yet been made public, so it is difficult to comment on the specifics of a ban. However, the following comment is based on the Government implementing a comprehensive ban on the import and export of hunting trophies and our analysis refers to the overall trophy hunting of wild animals, and in particular at-risk species and the industry which supports this practice.

The short answer is yes, trophy hunting has been shown to have a detrimental impact on conservation of endangered species. Ending UK involvement in Trophy Hunting will help to lessen the damage caused by this outdated practice, and demonstrate support for genuine non-consumptive conservation efforts.

The trophy hunting industry claims that the revenue generated through hunting helps to fund conservation efforts, however, the notion that trophy hunting benefits species conservation is false. A litany of scientific research shows that trophy hunting threatens the survival of many species and harms conservation.

Globally, wildlife populations are rapidly declining due to poaching, climate change, habitat loss and degradation, human-wildlife conflict and other human-induced activities. A landmark report by the Intergovernmental Science Policy Platform on Biodiversity and Ecosystem Services (IPBES) warned that one million wild animal and plant species are now threatened with extinction and that direct exploitation is one of the main causes.<sup>i</sup> Species that are highly sought by trophy hunters, such as African elephants, leopards, rhinos, and lions, have not been spared from this global trend and have experienced sharp population declines in recent decades.

### **Impact on conservation of endangered species**

Wildlife biologists have sounded the alarm that trophy hunting exacerbates the population declines of already imperilled species and harms conservation by deliberately removing the largest and strongest males. Because trophy hunting is selective in its targets, it adds to the population decline of these species by what scientists call a “super-additive” threat, meaning that the animals hunters selectively kill will result in more mortalities than that would normally occur in nature.<sup>ii</sup> Trophy hunters kill breeding-aged animals, disrupting the social structure of populations and leading to indirect effects and consequences such as sexually-selected infanticide and the decreased recruitment of young. In contrast, natural mortality in trophy hunted species disproportionately affects the very old and very young.

Trophy hunters, often driven by competitive goals, generally target the biggest and strongest males, meaning that trophy hunting removes these animals from the breeding pool and unnaturally selects for smaller or weaker animals.<sup>iii</sup> Researchers have found that the selective nature of hunting causes changes in desirable phenotypic traits in targeted species. In particular, trophy sizes for wild herbivores have experienced temporal decline in South Africa and Tanzania. Muposhi et al (2016) state that “Declines in trophy size over time due to selective harvesting could be attributed to phenotypic plasticity that may result due to a decline in abundance of big tuskers and individuals with big horns or tusks as these are mostly selected by hunters.”<sup>iv</sup>

Selective removals could also weaken wild animals’ survival and adaption to climate change, thus increasing their risk of extinction. Recent research from Queen Mary University of London revealed that trophy hunting has more profound impacts on wildlife than previously thought.<sup>v</sup> The authors, relying upon sexual selection theory that the fittest males typically breed, found that “the sorts of selectivity associated with human predation can lead to uniquely severe impacts on harvested populations” particularly when environmental change, such as climate change, is considered.<sup>vi</sup> They concluded that “the effect of selective harvesting on extinction risk under environmental change appears to be strong and should at least be considered when strongly sexually selected species are harvested”.<sup>vii</sup> This study illustrates not only the need to consider environmental changes in decision-making about the effects of trophy hunting but the need to also ensure that such hunting does not increase extinction risk.

Trophy hunting offtake decreases the likelihood that populations can recover from other impacts such as poaching. Biologists even warn that when trophy hunting is sanctioned, poaching activity increases, likely due to the perception that species authorized for hunting are of diminished value and the perception that legal killing increases the acceptability of poaching.<sup>viii</sup> Scientists who examined the performance of African protected areas for lions and their prey found that protected areas used primarily for trophy hunting were associated with increased severity of bushmeat poaching and poaching for non-meat body parts.<sup>ix</sup> One explanation is that poaching and agropastoral encroachment have increased because hunting associations failed to invest the necessary amount of money to counter this development.<sup>x</sup>

Restrictions on trade of hunting trophies directly contributes to species conservation by reducing the number of wild animals killed. Indeed, several countries in Africa have imposed export bans to protect their wildlife populations from trophy hunting and the reported population rebounds indicate that such bans work.<sup>xi</sup> For example, South Africa imposed a moratorium on leopard trophy

hunting in 2016 and 2017.<sup>xii</sup> Likewise, Zambia imposed a moratorium on trophy hunting big cats due to concerns over population declines.<sup>xiii</sup> The country halted trophy hunting in certain concessions or hunting blocks of African lions and leopards starting in 2013 with leopard hunting resuming in 2015 and lion hunting in 2016.<sup>xiv</sup>

### **Failure to fund conservation or communities**

A 2019 report by the IUCN Programme on African Protected Areas and Conservation examined the revenue generated by trophy hunting for conservation. The report estimated the cost of managing a savanna protected area to be about USD 7 to 8 /ha/year (it can be much higher for species like lions, or for fenced areas).<sup>xv</sup> Compare this to the paltry amount that trophy hunters spend: According to a trophy hunting advocacy organization, between 2013 and 2015, 27 hunting operators exploiting 121,400 km<sup>2</sup> in Tanzania spent USD 2.24 million,<sup>xvi</sup> the equivalent of only USD 0.18/ha/year. Therefore, trophy hunters paid only 2.25% of the amount needed to properly manage the area that they hunted in. By comparison, in Kenya, which banned trophy hunting in 1973, the Kenya Wildlife Service had a budget of USD 68 million in 2015 to manage 46,400 km<sup>2</sup>, a rate of USD 14.56/ha/year.

A 2010 study of trophy hunting in Tanzania found that only around 3% of the costs associated with an average trophy hunt found their way to local community development with the majority of income going to operating costs of trophy hunting industry operators and government fees.<sup>xvii</sup> The failure of the trophy hunting industry to adequately fund local communities leads to greater poaching; a 2019 study of attitudes of local people living in three of Zimbabwe's rural communities that allow trophy hunting found that poaching was widespread, with people attributing poaching to the need for meat and for household income.<sup>xviii</sup>

Trophy hunting as a pursuit is a colonial hangover and not a community development tool. As an IUCN study of trophy hunting in West Africa put it, "many reserves and hunting areas were defined more than 50 years ago under the colonial regimes, at a time when the human populations represented, in terms of numbers, 20 or 25% of current figures. Therefore, it is hardly surprising that from the outset the design concept favoured the big game hunting industry to the detriment of local populations". That same study concluded that the role of trophy hunting played in community development was "negligible from an economic and social point of view, particularly in light of the considerable surface areas concerned. Therefore, big game hunting has a rather negative effect on development".<sup>xix</sup>

The financial benefits to countries that engage in trophy hunting have also been exaggerated by the trophy hunting proponents and those who profit from them. Upon closer examination, a 2017 study by Economist's at Large found that "while overall tourism is between 2.8% and 5.1% of GDP in the eight study countries, the total economic contribution of trophy hunters is at most about 0.03% of GDP."<sup>xx</sup>

Conversely non-consumptive engagement with wildlife such as photo tourism can be far more lucrative; while a trophy hunter may pay \$40,000 to shoot a bull elephant, a living elephant would generate \$23,000 annually through photo tourism, meaning a potential value of \$1.6m over its lifespan.<sup>xxi</sup>

### **True conservation or wildlife farming?**

Areas where hunting is allowed are not comparable to protected areas although such land is commonly included in tallies of land devoted to conservation. For example, game ranches have perimeter game fencing that interrupt natural wildlife migrations; they can be small and over stocked resulting in habitat degradation; game ranchers also kill non-huntable species, like endangered wild dogs, that eat the animals they want to sell as trophies; ranchers increase the diversity of animals they can sell to trophy hunters by stocking non-native species; and ranchers purposefully hybridize two closely related species or manipulate genetics to create unique varieties that trophy hunters desire.<sup>xxii</sup> These hunting concessions do not contribute to genuine biodiversity preservation because they are driven by financial profits. Similarly, trophy hunting occurs on

communal areas where hundreds of thousands of people live and engage in agricultural activities; clearly, such areas are not conserving wildlife habitats, yet they are included in trophy hunting advocates' tallies of land devoted to conservation.

South Africa is a prime example that modern day trophy hunting has very little to do with conservation. With a very large trophy production industry in South Africa, some trophy-hunted species are intensively bred, managed and genetically manipulated to produce higher numbers of bigger and better trophies. Animals are farmed in the same way that cattle are farmed – calves are removed from mothers at very early ages and placed in breeding camps. This enables females to come into oestrus quicker and increases the breeding rate. Bulls and cows are selected, bred and traded for the best genetics. Trophy bulls are separated out. Animals are drugged and horn measurements taken, guaranteeing hunters a good trophy. Horns are piped to protect them from being damaged to ensure the trophy quality while bulls are kept separate to prevent injuries and fighting. Trophy animals are marketed at auctions for genetics, horn size and as trophies—and then supplied on demand for a hunt; essentially “put and take or canned hunts.”

Some species are intensively bred and genetically manipulated to produce a large variety of colour variants, such as golden or pink wildebeest and white, black or dappled impala. These colour variants usually arise from recessive genes that are then amplified by manipulated breeding practices. Along with the recessive genes go other, weaker and problematic genetic traits that have both welfare and biodiversity concerns. A 2016 report warned that, “The management practices for color [sic] variants are a direct threat to biodiversity because they result in the persecution of predators and because the animals are bred intensively with little regard to the environment.”<sup>xxiii</sup>

### **Population decline attributed to trophy hunting**

Trophy hunting has also been shown to have a detrimental impact on population or subpopulation numbers of several of the world's most iconic and vulnerable species.

#### African elephant:

African elephants are highly intelligent animals, living in complex social groups. Elephants in disrupted family groups exhibited signs of chronic stress, which can result in lower immunity and lower rates of reproduction.<sup>xxiv</sup> In 2020 the IUCN Red List upgraded African Savannah elephants from vulnerable to endangered and African Forest elephants to critically endangered. Despite this, elephants are still widely targeted by trophy hunters in many African countries.

- Namibia: A 2019 article found that although the government of Namibia claimed that community-based wildlife management has tripled the number of wildlife on community-owned land, the most-heralded such community, Nyae Nyae, has suffered severe depletion of wildlife mainly because of maintenance of high trophy hunting quotas despite the negative impact of drought on wildlife.<sup>xxv</sup> The number of elephants fell from 1,797 animals in 2015 to only 603 in 2017, yet the government-allocated hunting quota of nine animals remained the same from 2014 to 2018.
- Zimbabwe: A 2016 study on the impact of trophy hunting on large herbivores, including elephants, in the Matetsi Safari Area near Hwange National Park, Zimbabwe, found that trophy tusk sizes of hunted African elephants declined significantly from 2004-2015 indicating that elephant trophy hunting in the area is not sustainable.<sup>xxvi</sup>
- Botswana, South Africa, Zimbabwe: A 2014 study found that elephant hunting in the Greater Mapungubwe Transfrontier Conservation Area, which includes Botswana, South Africa and Zimbabwe, was unsustainable and predicted that “trophy bulls will disappear from the population in less than 10 years.”<sup>xxvii</sup>

#### African lion:

Once called the king of the jungle, Lion populations have declined dramatically over recent decades with an estimate 20,000 adult animals remaining in the wild. Lions are a highly sought after trophies making up one of the “Big 5”. Sadly, in recent years the demand for hunting lions has led to the captive breeding of tens of thousands of lions in South Africa to be hunted by hunters in enclosed areas. While some in the trophy hunting industry oppose this practice they remain supportive of the

hunting of the dwindling numbers of wild lions. Offtake of wild breeding aged males due to trophy hunting results in increased levels of infanticide.<sup>xxviii</sup>

- Zambia: A 2018 study of lions in Zambia's South Luangwa National Park, where trophy hunting does not occur, and the adjacent Lupande and Lumimba Game Management Areas, where trophy hunting occurs, found that lion hunting outside the park caused the lion population decline inside the park through a "vacuum effect" whereby male lions move from inside the park to fill vacancies caused by trophy hunting outside of the park.<sup>xxix</sup>
- Cameroon: A 2011 study of lions in Cameroon's found that "a combination of high poaching pressure and excessively high lion trophy off-takes appear to have led to the lion population demise."<sup>xxx</sup>
- Zimbabwe: A 2014 study found that "excessive trophy hunting" in trophy hunting areas on the periphery of Gonarezhou National Park, where hunting is not permitted, drew lions out of the park to fill territorial vacuums in the hunting areas, and accounted for population decline in the park.<sup>xxxi</sup>
- Tanzania: A 2011 study concluded, "trophy hunting appears to have been the primary driver of a decline in lion abundance in the country's trophy hunting areas and is likely affecting lion abundance in Katavi National Park and possibly Tarangire National Park."<sup>xxxii</sup>
- Benin: A 2014 study of lions in the Pendjari Biosphere Reserve, Benin, which is composed of one National Park and two Hunting Zones, found that low lion density in the Park was the result of excessive trophy hunting in the Hunting Zones.<sup>xxxiii</sup>

#### African leopard:

Leopards are solitary animals and population growth is slow due to long lifespans, low reproductive rates, long intervals between births, and long periods of cub dependency. High rates of human offtake can artificially increase rates of male takeovers and infanticide to an unsustainable level which negatively affects population growth.<sup>xxxiv</sup>

- Zambia: A 2016 study of leopards in Zambia's South Luangwa National Park, where trophy hunting is not allowed, found that leopard density in the park was 67% higher than outside of the park, where trophy hunting was allowed.<sup>xxxv</sup>
- South Africa: In 2017, the government determined that leopard trophy hunting was unsustainable in at least two provinces due to excessive quotas among other reasons and set a zero-export quota for leopard trophies.<sup>xxxvi</sup>
- Mozambique: A 2012 study found that trophy hunting combined with illegal offtake has caused leopard population declines.<sup>xxxvii</sup>
- Namibia: A 2016 study found that poorly managed trophy hunting was a threat to the leopard in Namibia.<sup>xxxviii</sup>
- Tanzania: A 2009 study found that the leopard population in Tanzania was declining due to excessive offtake for trophy hunting.<sup>xxxix</sup>

In conclusion, the trophy hunting industry has caused sustained damage to the conservation of endangered species around the world. At the same time the funds for conservation and local communities trophy hunting claims to generate have failed to materialise in a meaningful and sustainable way, and all the while populations of some of the world's most magnificent animals continue to decline. By ending the import and export of hunting trophies from species at threat we will end UK tacit support for this outdated practice, and through this demonstrate support for genuine efforts to conserve endangered species around the world.

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

No. The current system under which trophy hunting operates contains numerous loopholes and exemptions which lead to a shocking lack of effective oversight. Importing countries rely heavily, if not entirely, on the documentation provided by exporting countries and the hunting groups who have a financial stake in keeping trophy applications coming. The non-detriment finding is the most obvious loophole. In a clear conflict of interests, all too often assessments as to the non-detrimental impact of trophy hunting are made by those offering or benefitting financially from the hunts. Rarely is there rigorous and independent scientific scrutiny by an importing nation of the circumstances surrounding the acquisition of the trophy. Any rule which treated trophies differently dependent on where the animal was hunted would be business as usual and create a loophole which would be exploited by the trophy hunting industry.

### **USA Endangered Species Act**

In the USA, the trade in trophies is regulated by the US Fish & Wildlife Service (USFWS). People seeking to import a trophy into the US from a species protected under the Endangered Species Act (ESA) as a threatened or endangered species must submit a permit application to the USFWS. The applications vary by species. Using African lions, which are listed as threatened, as an example, the USFWS application asks for information on the hunt, the outfitter, and where the trophy was (or is to be) taken. It also asks for population trend data on the species; the amount paid and how that money was used by the landowner, local community, or government; and activities carried out that provide a conservation benefit to the species being hunted. For endangered species only, the application is published in the Federal Register and is open for a 30-day public comment period. There is no such requirement for species listed as threatened under the ESA. The USFWS will then make a finding of whether the hunt will enhance the survival of wild populations of the species as required under the ESA in order to issue the permit. This part of the process may take up to 90 days, however, depending on the species targeted by the hunter, the USFWS recommends applications be submitted up to 18 months in advance.

The overall process is turbid, and the USFWS has been, in the past, and is currently embroiled in lawsuits with both trophy hunting proponents (e.g. National Rifle Association, Safari Club) and animal welfare and conservation groups suing the government to challenge how determinations are made and for their lack of transparency. It is also a political football, with each Administration overturning and changing orders from the previous one. For example, in 2014, the USFWS under President Obama issued rules banning imports of African elephant trophies from Tanzania and Zimbabwe, following the agency's completion of country-wide enhancement findings that demonstrated there was not adequate conservation value to hunting the species for sport. In 2017, the USFWS, under President Trump, reversed that decision, allowing imports of African elephant trophies from those two countries, and subsequently adopted a policy that, in effect, stripped the public of the opportunity to provide input to the USFWS's findings in a timely manner. In 2019 the agency also began allowing imports of African lion trophies from Tanzania for the first time since the species was listed as threatened under the ESA, in 2016.

As we have outlined, the current system does not provide effective oversight. The trophy hunting industry is rife with *mismanagement, inflated quotas and corruption and cannot be trusted to provide adequate and transparent oversight of the conservation on some of the world's rarest species*. This means the massive administrative work that would need to be undertaken by the UK government to accurately verify a claimed conservation benefit for each hunting trophy. We believe this would be impossible, not cost-effective, and would absolutely risk regular legal challenge. Even if a case could be proved, this would surely amount to UK government-sanctioned trophy hunting.

## Corruption and criminality

The trophy hunting industry has also demonstrated it cannot be trusted with management of populations of endangered species. Numerous examples show the industry engaging in corrupt and at times criminal activity in the pursuit of profiting from the exploitation of rare animals.

A 2009 report focused on Tanzania found, “The conduct of recreational hunting is often linked with corrupt practices, particularly in poor countries that attract foreign tourist hunters willing to spend large sums of foreign exchange to hunt prime trophies. In turn, tourist hunting can attract outfitters who seek to circumvent legal controls over biological, ethical and financial aspects of the hunting industry through exceeding or misusing quotas; poor hunting practices; and flouting of foreign exchange regulations.”<sup>xi</sup>

In 2014, the U.S. Department of Justice charged the owners of a trophy hunting outfitter company, Out of Africa Adventurous Safaris, with conspiracy to sell illegal rhinoceros hunts in South Africa in order to defraud American hunters, money laundering and secretly trafficking in rhino horns.<sup>xii</sup>

In 2018, Ross Jackson, a director of the Dallas Safari Club, a leading trophy hunting industry group, pleaded guilty in a federal court proceeding to violating the U.S. Endangered Species Act (ESA) by exporting ivory from an elephant he illegally killed in a national park in Zimbabwe in spring 2015 to South Africa, where he planned to sell the tusks for USD 300 per pound.<sup>xiii</sup>

A 2019 report documented how a Mozambique trophy hunting outfitting company and game farm, Limnetzi Safaris, allegedly participated in a transnational criminal organization by providing cover for an illegal gun running operation which supplied trophy hunting rifles to rhino poachers.<sup>xliii</sup>

The legal trade in hunting trophies also provides cover for the illegal trade. This was one of the arguments during the passing of the Ivory Act; that continuing to allow the legal trade in ivory would provide cover for the illegal trade and place a price on the heads of elephants. The same can apply to trophy hunting. Where legal trophy hunting takes place so does poaching and the illegal wildlife trade, with numerous examples of trophies being used as cover.

For example, in South Africa numerous cases of so called ‘Pseudo-hunts’ were exposed where the legal trade in trophies was used as a means to trade rhino horn illegally to parts of South East Asia for use in traditional medicine. A stark insight on how the hunting industry views these cases comes from the case of Peter Thornmahlen, who despite being arrested on numerous occasions for involvement in this appalling activity<sup>xliiv</sup> was awarded the SCI Professional Hunter of the Year award in 2018.<sup>xlv</sup>

This level of mismanagement, corruption and criminality demonstrate that a system which treats trophies differently dependent on the setting in which it was killed would not work. The industry has shown that it could not be trusted to manage such a system and the UK authorities would not be able to provide effective oversight.

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

Current CITES regulations differentiate between the purpose of imports and exports of animal specimens, meaning that it is possible for Border Force to regulate between hunting trophies and scientific, medical, educational and law enforcement specimens.

Exemptions included within the Ivory Act are limited only to instances where the value of an object is not based on its ivory content (musical instruments, antique miniature paintings or objects of cultural/historic significance for example). The Act rigidly sticks to the principle that ivory is only

valuable to a living elephant, that any continuing trade in ivory helps provide legitimacy to the illegal ivory trade and that only by devaluing ivory as a product would it have real impact. The Ivory Act was rightly hailed as one of the strongest ivory bans in the world and showed excellent UK global leadership.

We believe the same principal must apply to the hunting trophy import/export ban. Since the government has recognised that trophy hunting has a detrimental impact on threatened and endangered species, exemptions based on the misplaced notion of conservation benefit will perpetuate the myth that trophy hunting, which puts a bounty on the heads of individual animals, has an inherent value and would allow for loopholes for the industry to exploit. An exemption allowing, for example, the import of historic trophies by museums or other bona fide institutions would be more in line with the tenor set by the Ivory Act. This legislation would also not affect existing possession of hunting trophies in the UK. The legislation would relate to international trade and would have no impact on those who are already in possession of hunting trophies.

The proposed ban on the import and export of hunting trophies could easily be worded to avoid any unintended consequences. However, the legislation would need to be comprehensive enough and adequately enforced to ensure that any such exemptions for historic specimens were not exploited as loopholes.

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

The current measures on the trade in hunting trophies provide woefully inadequate oversight and are in many ways designed to support the commercial trade in trophies from endangered species. The hunting industry is well-funded and well equipped to navigate the existing measures; hunt outfitters will work to secure all necessary paperwork and permits for hunts of even the most endangered species. In countries where trophy hunting takes place often governments are all too willing to support these efforts as fees from permits provide resources to Government Departments and officials. This profit motive can be disastrous for wildlife leading to unsustainable hunting of endangered species. For example in Zambia, the Zambia Wildlife Authority relies on trophy hunting in Game Management Areas for about 45-67% of their revenue which forces ZAWA to “achieve financial survival at the expense of the wildlife they are mandated to conserve” by, for example, increasing lion trophy hunting quotas even when they are not sustainable.<sup>xlvi</sup>

Part of the CITES regulations involve the setting of quotas for “off-take” i.e. the number of animals of a given species allowed to be hunted and exported each year. Quotas are often set as high as possible and fail to adapt to falls in population. For example, the decline in elephant numbers in Namibia outlined in our response to questions 1 failed to result in a quota reduction.<sup>xlvii</sup>

Trophy hunting of at-risk species is a declining industry as global public distaste against trophy hunting continues to grow. Betting on a sunseting industry to deliver conservation or community benefits, proven to be minimal or even detrimental, would be a wrong-headed policy direction.

#### **Non-Detriment Findings (NDF)**

CITES regulations which govern the trade in endangered species state that regarding the trade in hunting trophies from species listed as Appendix I and II a non-detriment finding assessment must be carried out. This is a process designed to assess whether the hunting of an animal has had a detrimental impact on the population of a species.

Unfortunately, these assessments are carried out often by national authorities or groups which benefit financially from trophy hunting, with no independent oversight or is not based on rigorous and up-to-date science. There are also certain CITES Parties which have ‘reservations’ on some species meaning they do not recognise the listing of a given species.

## CASE STUDY

In 2019 Giraffe were listed as an appendix II species in CITES meaning that the international trade in their specimens, such as trophies is, regulated and that exporting countries should provide a non-detriment finding to accompany an export of giraffe specimens.<sup>xlviii</sup> However, South Africa took out a reservation to the listing as did a number of other countries.

Parties (South Africa) that entered reservations to the giraffe CITES Appendix II listing, are to be treated by other Parties (UK) as a State not a Party to CITES with respect to trade in giraffe specimens. Parties importing giraffe specimens from a Party that has entered a reservation to the giraffe Appendix II listing should not accept permits and certificates unless they have obtained certification to the effect that the competent scientific institution has advised that the export will not be detrimental to the survival of the species (in case of doubt a copy of such advice should be required) and that the specimens were not obtained in contravention of the laws of the State of export.<sup>xlix</sup> CITES clearly puts the onus on the importing Party to ensure that non-detriment findings and legal acquisition findings have been made by the exporting Party.

An example of the flaws in this system is provided. In 2020 Humane Society International found through FOI that the UK had imported a number of hunting trophies from South Africa since 2019. When we asked whether they had received the NDF and 'legally acquired' assessment from the South African authorities the Government responded:

*"Animal and Plant Health Agency (APHA) can confirm that the 'Legally Acquired' assessment would have been a decision made by the South African authorities."*

As HSI has an office in South Africa we had also asked the South African authorities whether they had carried out an NDF on giraffes they responded that an NDF was not in place. However, the UK still allowed the import of giraffe hunting trophies.

We have met with APHA and DEFRA to discuss this and they deem that as they carry out their own NDF this is sufficient. However, CITES Resolution Conf 9.5 (Rev. CoP16) states that:

*"Permits and certificates issued by States not party to the Convention not be accepted by Parties unless they contain":*

*"iv) in the case of export of specimens of a species included in Appendix I or II, certification to the effect that the competent scientific institution has advised that the export will not be detrimental to the survival of the species (in case of doubt a copy of such advice should be required) and that the specimens were not obtained in contravention of the laws of the State of export."*

Through our ongoing discussions with DEFRA and APHA, we are able to assess the NDF carried out by the UK and found that much of the data is based on unverified population numbers and relies heavily on information from those involved in or supportive of the trophy hunting industry.

This is just one recent example of the many flaws which exist with the CITES system, which means that thousands of vulnerable animals continue to be traded around the world each year as trophies while their populations continue to decline.

While the current system of permits and fees provide funds to those who own and run game reserves to manage those areas, this cannot be called 'conservation' as majority of the profits line the pocket of hunting operators.

## **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?**

The impact of a ban of this nature would be to end UK involvement in activities which do not meet the welfare standards that animals are afforded in Britain. We hope that this legislation would dramatically reduce the involvement on British public in such activities when abroad. In the short term the passing of such legislation would help to raise awareness among the public of the cruel nature of many of these practices. In the long term the removal of adverts in the UK we hope will lead to a reduction in UK tourists' involvement in such practices while traveling abroad, which in turn would lead to an overall reduction in supply. This legislation would not bar people traveling from the UK to other countries and engaging in attractions, activities or experiences that involve the unacceptable treatment of animals, but by allowing the continued advertisement of these activities in the UK adds legitimacy to activities which have been evidenced to cause harm and suffering to animals.

Having consulted with the UK Centre for Animal Law, we are not aware of any reasons why the proposed ban would give rise to incompatibility with any international trade treaty to which the United Kingdom is a party. We are not aware of any reasoned argument that has been made that the proposed ban would give rise to any such incompatibility.

There are a number of activities which we feel should no longer be advertised in the UK. These include:

### Petting of baby animals and photo opportunities

Tourist attractions around the world offer public contact with baby animals, such as tiger cubs, lion cubs, bears, and various primates. These interactions are harmful to the animals, dangerous to the public, and detrimental to conservation. The animals often suffer from malnutrition, inadequate veterinary care, disrupted sleep and rest, and premature death. They are deprived of maternal care essential for proper development. Many of the animals used for public handling are also subjected to physical abuse. These animals can also cause injury and spread diseases to members of the public. When they grow too large for public handling, they may end up warehoused in small cages at roadside zoos or sold into the exotic pet trade.

In South Africa, companies are breeding lions in captivity for the purpose of making money from several activities involving the captive-bred lions. These lions are kept in unnatural, inappropriate, and often inhumane conditions including but not limited to: cubs are removed from their mothers before weaning, cubs do not receive medical care, cubs experience poor nutrition, cubs are treated harshly by their handlers, cubs are not in an emotionally supportive environment, mothers whose cubs are removed come into heat soon again and are repeatedly bred. These facilities have cub petting programs, for which they charge visitors a fee; they also rent out the cubs to other enterprises for petting. Once the cubs are older, they can be used for "lion walks," where tourists pay a fee to walk a lion. Once the lions are full sized, they are offered to hunters in canned lion hunts. Or they are killed and their parts put into trade: lion bones are traded to Southeast Asia where they are used in fake medicinal tonics, the skins are traded for home décor, or they are made into trophies. This cruel industry thrives off people's desire to have close contact with lions and should not be supported.

### Swimming with Dolphins

In the wild, dolphins live in large groups (called pods), often in tight family units. Social bonds often last a lifetime. In captivity, marine mammals are forced to live in unnatural environments that are a tiny fraction of the size of the animals' natural habitats. Dolphins are always swimming. They rest with half their brain active, so they will continue to breathe and remain alert for hazards. They are "voluntary breathers," conscious of every breath they take. They are always aware, and always moving. Understanding this, it is difficult to imagine the tragedy of their lives in the small enclosures

of marine parks. No captive facility can adequately simulate the vast ocean or provide for their complex behavioural needs. Furthermore, many of the animals in these facilities outside of the United States were taken from the wild. The capture of and trade in live marine mammals negatively impacts wild populations and habitats. Most capture methods are extremely traumatizing, involving high-speed boat chases and capture operators wrestling animals into submission before hauling them onto a boat. Many people have been injured by dolphins in these programs. The UK would be taking an important stand by preventing the advertising of these demonstrably poor welfare industries overseas.

### Elephant rides

Elephant rides are becoming a relic of the past for two exceptionally good reasons: they are undeniably cruel to the animals and they pose very real safety risks to the public and handlers. Elephant trainers use bullhooks—a barbaric device that resembles a fireplace poker—to punish and control elephants. Bullhooks inflict pain on an elephant’s skin, which is rich in nerve endings and so sensitive that they can easily feel the sting of an insect bite. It is common to find evidence of bullhook abuse - such as scars, puncture wounds, abrasions, and lacerations - on elephants used for entertainment. Additionally, an 8,000-pound elephant is not designed to stand in one place, often on hard surfaces, for long periods of time. In captive environments where they are used for rides or performances, elephants are subjected to prolonged chaining and extreme confinement, which leads to deadly foot disorders and premature arthritis—the leading causes of death in captive elephants. Elephant trainers cannot protect themselves, let alone the general public, when an elephant rebels against a trainer’s physical dominance. There have been countless elephant rampages that have caused death, injury, and property damage. In addition, multiple research investigations, including reports by the United Nations Convention on International Trade in Endangered Species, have documented wild live elephants being illegally captured to supply the lucrative tourism industry in Southeast Asia.

## **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 individual countries and governments to police and legislate protection for animals within their own country, we believe the UK has a responsibility to restrict the advertisement of activities in other countries which would not meet the welfare standards we have here, and have been shown to cause unacceptable levels of harm and suffering in the countries where the activities take place. We believe that evidence of instances of attractions, activities or experiences overseas causing unacceptable welfare outcomes should be considered for inclusion in a UK advertising ban by the Defra Secretary of State on a case by case basis, with evidence considered by Defra departmental animal welfare specialists, and the decision scrutinized by the newly formed Animal Sentience Committee.

The Conservative Party Manifesto in 2019 described high animal welfare standards as one of the hallmarks of a civilised society, if we are to meet this standard we cannot continue to out-source animal cruelty to other countries, as something British people only enjoy on their holidays abroad.

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