



"Embracing Innovation to Conserve the World's Animal Kingdom."

Mr Rory Stewart MP
Parliamentary Under Secretary of State
for Environment and Rural Affairs
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cc: The Rt Hon Elizabeth Truss MP, Secretary of State for Environment, Food and Rural Affairs
Catherine Bearder MEP, MEPs4Wildlife
Kevin Woodhouse, Defra Customer Contact Unit
Dr. Pieter Kat and Christine Macsween, LionAid
Prof. David Macdonald, WildCRU
Mark Jones, The Born Free Foundation

3 December 2015

Dear Mr Rory Stewart MP,

Adjournment Debate, "African Lion Numbers," 24 November 2015

Correspondence References:

A: IWB Letter, to Rt Hon Elizabeth Truss MP, dated 16 September 2015

B: Defra Letter, Kevin Woodhouse, Ref DWO385854, dated 29 September 2015

I have been reading the summary of the 24th November 2015's Adjournment Debate, "*African Lion Numbers*."

First of all, may I start by saying how pleased I am that the plight of the African lion is being debated in The House of Commons Chamber. There were some positive concerns raised in the referenced debate that clearly acknowledged the worrying, declining trend in wild African Lion populations numbers (as evidenced by the IUCN Red List⁽¹⁾ and summarized at Appendix 1 to this letter).

The conflict raised by the ever increasing human demands for agricultural land use, grabbed from the lion's natural habitat, was cited as the main 'driver' for this "iconic" species' sad decline.

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So why do we continue to tolerate the needless additional burden with the Trophy Hunting fraternity's 'demands' to take wild population numbers purely for human self-gratification?

Therefore, I have considerable concern with the current stated Defra strategy and approach being undertaken on this important issue, namely:

1. The suggested Defra *"assessment of the hunting industry"* over a proposed 2 year time frame to ascertain if there is *"significant improvement in the performance of the hunting industry"*:
 - a. The concern is that the United Kingdom Government will look (at best) 'complacent,' when the alarming decline in wild African lion population numbers has been clearly acknowledged;
 - b. The concern is that the United Kingdom 'could' look (at worse) 'complicit' in pandering to the needless decline of African lion population by not acting sooner with the evidence already available. But instead, 'chooses' to ignore the evidence that the *"hunting industry"* has no conservation value whatsoever to support its claim to 'help' sustain African lion population numbers, or indeed supports local communities etc.⁽²⁾
2. There is a suggestion that one *"key indicator"* that the United Kingdom Government will consider in assessing *"improvements in what is happening in Africa,"* is *"the age of the lions involved – the latest scientific research pushes for that to be over six [years old]."* The questions this raises are many-fold:
 - a. Why such an age limit is applicable? But also more worryingly, how could any such 'stipulation' possibly be reliably enforced on the ground, in the wild, in country?:
 - i. Does anyone seriously believe that after stalking and tracking any given lion, the 'noble hunter' will back-off from taking their 'kill/prize' because the target lion 'might' be less than six years' old? I think the 'noble hunter' will continue to shoot arrows/bullets regardless and work out

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afterwards if the lion killed can be 'verified' as fitting any such arbitrary, 'stipulated' criteria or 'quota.' If it doesn't, then it's too late anyway.

- ii. How can anyone tell from a distance, the precise age of any target lion (or any species for that matter) in the wild?
- iii. If you recall, Cecil the lion was wearing a highly visible tracking collar. But that didn't prevent him from being 'targeted' for one moment (and of course, prevent Cecil's slow, tortured death at the behest of the 'noble hunter').

3. A piecemeal/indecisive approach to lion trophy imports into the United Kingdom:

- a. If only "2 lion trophies" per year are currently imported into the United Kingdom, this begs the question then what is the real harm to anyone if the United Kingdom Government takes an immediate, all-encompassing, inspiring approach (as per Australia and France) to ban all lion trophy imports regardless of any suggested country of origin? This latter stance sends a clear message (including to the United States), not some tacit acceptance of the status quo that will be tackled over time (perhaps).
- b. The European Union's (EU's) Scientific Review Group (SRG) agreed on 15 September that lion trophies can still be brought into Europe from Tanzania, Zimbabwe, Namibia and South Africa, plus Zambia subject to approval on a case-by-case basis.
- c. I am pleased that the United Kingdom Government has "*already moved to take Benin and Ethiopia off the list of countries we are prepared to import lion trophies...*" Furthermore, "*we will be moving against Zimbabwe Zambia and Mozambique.*"
- d. However, imposing trophy import bans for one, or two countries hardly sends out a message of solid commitment. But is also appears somewhat naïve, because a non-blanket/outright trophy imports ban across all relevant countries could easily be circumvented:

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- i. Is it not apparent, that regardless of where the 'noble hunter' takes a permitted lion 'kill,' the opportunity to smuggle their 'prize/trophy' across borders into a country that can still import the 'prize/trophy' back into the United Kingdom is not going to present too many obstacles – regardless of any paper trail required. The required 'paperwork' could easily be subject to corrupt influence and 'arrangements' made to circumvent the United Kingdom's loose import 'stipulations?'
 - e. The only guaranteed solution to prohibit trophy imports is a complete, all-encompassing, species specific import ban into the United Kingdom. This could of course (as France is considering) be extended to many more equally persecuted and vulnerable species, for example the *Acinonyx jubatus* (cheetah), with only an estimated 10,000 wild population left and that population in decline according to the IUCN Red List.
4. No clear current commitment by Defra in the debate (or in acknowledgement at Reference B to my letter, Reference A) to push for a unanimous European Union decision/resolution to 'uplist' the African Lion to CITES⁽³⁾ Appendix I for the forthcoming, seventeenth regular meeting of the Conference of the Parties to CITES (CoP17) (scheduled to be held in South Africa, September 24 to October 5, 2016):
- a. Clearly, 'uplisting' the African lion to CITES Appendix I, should (in theory) prevent any uncontrolled, commercial trade in the African lion. Surely, this is a powerful, potential path to try to ensure 'transparency' and 'compliance' with any quota/verification system that seeks to halt the decline in wild African lion population that's so desperately needed? CITES Appendix I listing would bring into check (assuming compliance within South Africa and other relevant countries) the purely 'commercial' activities, such as 'canned' farming and Trophy Hunting of this vulnerable species?
 - b. Of course, other mitigating pressure on the African lion must also be simultaneously pursued, such as the conflict between the encroachment of human agricultural 'needs' onto natural, lion habitats etc. Plus, of course, it is

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also paramount that there are well-funded and supported anti-poaching measures for those at the front-line of confronting poaching.

- c. If not already acknowledged, it is clear that the animal exploitation strategies currently being deployed within South Africa to 'self-approve' rhino horn harvesting⁽⁴⁾ (seeking to open a domestic trade in farmed rhino horn in defiance of a standing CITES ban) could easily be cross-referenced to other target species (eg. the lion bone trade) if CITES is not used and applied to its full extent now.
5. There is also the prevalent possibility that the United Kingdom's current stance/strategy on this issue will look increasingly 'weak' compared to its European Union partners. The Netherlands' (soon to take the rotating EU Presidency at this crucial juncture) Minister for Agriculture, Sharon Dijksma made a very clear statement⁽⁵⁾ of intent (27 October 2015):

"I feel that the poaching of ivory and rhino horn and other forms of trophy hunting are crimes that threaten biodiversity and the overall health of the natural environment. We need to work together in the international context to put an end to this despicable situation. The conference in March will be a major step toward ensuring the preservation of wildlife on our planet."

Conclusions

In conclusion, the current scientific evidence, research and status regarding the plight of the African lion is already overwhelmingly compelling - the wild African lion population is acknowledged to be in steep decline. There is no evidence whatsoever to say there is any potential upside events on the horizon (in the short, medium, or long term) that will reverse this trend.

Therefore, any additional time the United Kingdom's Government 'chooses' to spend prevaricating and awaiting the emergence of any 'positive signs,' or time spent contemplating the naïve expectation that there will be "*significant improvement in the performance of the hunting industry*" is bewildering.

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The *"hunting industry"* has had many long years and countless opportunities to prove its claim to seek to 'conserve' the African lion (and many other species). The *"hunting industry"* has clearly failed.

If the *"hunting industry"* was ever genuinely interested in 'conservation' it would have started pouring funds directly into genuine, scientific based conservation a long, long time ago, plus the *"hunting industry"* would have:

- Stopped the pre-meditated killing/murder of Africa lions (and many other species) for fun/prizes/trophies and pretending it's 'conservation;' and/or
- Stopped suggesting the dwindling wild African lion population (and many other species' decline) *"is all someone else's fault."*

One only has to look at the embarrassment to humanity the *"hunting industry"* has served up as 'conservation' to the world in the form of 'canned' hunting to realise the *"hunting industry"* is morally/ethically bankrupt. Any notion it is otherwise, or it 'will change' is not borne out by any reference to the *"hunting industry's"* track record, or based on any realistic evidence. It can only be based on a simple, remote 'hope.' Relying on a remote 'hope' is not a good 'bet' on which to place one's own reputation, or that of the United Kingdom I would suggest.

The *"hunting industry"* should not be allowed one more iota of leniency, or complacent tolerance to make *"significant improvements"* in their *"performance."* The target species and humanity in general, has seen more than enough of the *"hunting industry's performance."* Any such naïve gamble that the *"hunting industry"* will miraculously change and 'save the day' borders on pure folly (and will be potentially judged by history as such).

I urge you/the United Kingdom Government to reconsider the current stated Defra approach/strategy to this vital concern and take clear, decisive action now. Yours/Defra's decisions will be key to this generation's legacy and what will remain of the wild Animal Kingdom for future generations to enjoy ('enjoying' without any invasive interaction I hasten to add).

I for one do not want to be branded as part of the generation that sat-by and waited for the extinction of the "iconic" African lion (or any other species) before realising decisive action could/should have been taken much, much sooner. Instead, we waited/gambled on the quaint

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notion that the "hunting industry" might change and/or actually help.

Thank you for your kind attention. I will await yours/Defra's response in due course.

Yours sincerely,

Stephen Alan Wiggins

Founder of International Wildlife Bond (IWB)

References:

- (1) IUCN Red List of Threatened Species, African Lion, published 2015 - <http://www.iucnredlist.org/details/15951/0>
- (2) "The Economics of Poaching, Trophy and Canned Hunting," IWB, 27 August 2015 – Note: Copy attached to this letter - <https://iwbond.org/2015/09/02/the-economics-of-poaching-trophy-and-canned-hunting/>
- (3) Convention on International Trade in Endangered Species of Fauna and Flora, <https://cites.org/eng>
- (4) "Commoditisation of Rhino Horn Trade 'Self-Approved' in South Africa," IWB, 30 November 2015 - <https://iwbond.org/2015/11/30/commoditisation-of-rhino-horn-trade-self-approved-in-south-africa/>
- (5) "Dijksma to pursue international ban on trophy hunting," The Netherlands' Minister for Agriculture, Sharon Dijksma, 27 October 2015 - <https://www.government.nl/latest/news/2015/10/27/dijksma-to-pursue-international-ban-on-trophy-hunting>

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Appendix 1

The African lion (Panthera leo)

Classed as "Vulnerable" but borderline "Endangered" by the IUCN⁽¹⁾.

According to WildCRU⁽²⁾ the African lion is in crisis now:

"[African] lions are in crisis. Because lions are uniquely visible to tourists there is a false impression that they are not endangered. The opposite is true: they are disappearing in plain sight. From an estimated population of 200,000 across Africa a century ago, and 30,000 a decade ago, as few as 20,000 lions may now roam free in the entire continent. Their numbers have been devastated by loss of habitat and wild prey, poaching, conflict with farming communities, unsustainable legal hunting, and emerging threats including the use of lion bones in traditional Asian medicine. Lions are being killed daily in Africa."

According to IUCN Red List of Threatened Species⁽¹⁾, African lions are "Vulnerable" but borderline "Endangered" where the IUCN concludes:

"With this in mind, we have greater confidence in the estimate of fewer than 20,000 lions in Africa than in a number over 30,000."

"This qualifies the lion as Vulnerable, but it is of great concern that the vast majority of the population is inferred to have declined at a rate that meets the criteria for Endangered. Since our sample populations were all monitored, we suspect an even greater average rate of decline for unmonitored unfenced populations across much of Africa, since lack of monitoring could suggest lack of conservation effort."

The number of lions in South Africa is also 'confused' by lions held in 'canned' hunting farms. According to government and private sectors sources⁽³⁾, it is thought there are about 200 farms and breeding facilities holding somewhere between 6,000 and 8,000 predators in captivity. The vast majority held, possibly as many as 7,000 of these, are lions. Other species held include cheetah and leopard as well as a host of exotic animals such as tiger, jaguar and puma.

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Furthermore, Ian Michler⁽⁴⁾ of Blood Lions has suggested that many 'canned' lions have been genetically muted through poor breeding management and these 'mutated' lions could never be released into wild populations (without pioneering rehabilitation and suitable measures taken anyway) for fear of genetic contamination. So, it could be easily argued that the inclusion of genetically mutated 'canned' African lions in with wild, pure African lion (*Panthera leo*) population estimates clouds the true picture and vulnerability of the species.

In the United States (US) the African lion has been proposed as an addition to the Endangered Species Act list, but the U.S. Fish and Wildlife Service⁽⁵⁾ has yet to 'finalise' the designation (which could take over a year):

"Following a review of the best available scientific information, the U.S. Fish and Wildlife Service today proposed listing the African lion as threatened under the Endangered Species Act (ESA). The agency's analysis found that lions are in danger of extinction in the foreseeable future." – 27 October 2014.

"Cecil's Law" is the moniker of a bill introduced by a group of U.S. Senators in July 2015, named in honour of Cecil the lion. The "Conserving Ecosystem by Ceasing the Importations of Large (CECIL) Animal Trophies Act," has the intent to extend current U.S. import and export restrictions on animal trophies to include species that have been proposed for listing as threatened or endangered under the Endangered Species Act. Current U.S. law only provides protection for species whose status on the list has been finalised by the U.S. Fish and Wildlife Service. The CECIL Act would ensure that species under consideration for protection are also covered by trophy import restrictions by default.

The Born Free Foundation⁽⁶⁾ summarises the dramatic decline of the African lion's population as follows:

1900 – up to 1 million

1940s – 450,000

1980s – 100,000

1990s – 50,000

2015 – as few as 20,000 officially classed as 'Vulnerable' with the West African population 'Critically Endangered.'

According to the International Union of Conservation of Nature⁽⁷⁾, lions are listed as

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‘Vulnerable.’ Over the last decade, there have been numerous attempts at establishing a continent-wide population and these studies vary between 15,000 and 35,000 animals. The numbers aside, nearly all agree that lions have vanished from over 80% of their historic range, and they now only occur in 28 African states. Because of the rapid decline in habitat and numbers, there are many that believe lions should be afforded greater protection by upgrading their status to that of Endangered (and protected under CITES Appendix I).

Appendix 1 References

1. IUCN Red List of Threatened Species, African Lion, published 2015
2. Wild CRU – Wildlife Conservation Research Unit, Department of Zoology, University of Oxford
3. ‘Blood Lions,’ www.bloodlions.org
4. Traveller24 News, Interview with (Blood Lions’) Ian Michler, 25 August 2015
5. US Fish and Wildlife Service (US FWS), US FWS – African lion, 27 October 2014
6. The Born Free Foundation
7. Union of Conservation of Nature

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