



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

Mr Rory Stewart MP  
Parliamentary Under Secretary of State  
For Environment and Rural Affairs  
Nobel House  
17 Smith Square  
London  
SW1P 3JR

cc: Kevin Woodhouse, Defra – Customer Contact Unit  
Via e-mail; Christine MacSween and Dr Pieter Kat, LionAid

3 May 2016

Dear Mr Rory Stewart MP,

### **Hunting Trophy Importation**

Correspondence Reference:

- A:** IWB Letter, *"Wildlife Trafficking and Trophy Hunting,"* dated 2 March 2016
- B:** Defra Ref: DWO391540, dated 21 January 2016
- C:** IWB Letter, *"Adjournment Debate, African Lion Numbers, 24 November 2015,"* dated 3 December 2015

Defra's reply (Reference B) was gratefully received. I wrote back a response (Reference A) and awaited further decisive United Kingdom Government action.

There have been a number of relevant developments recently:

1. A letter (attached at Appendix 1) prepared by LionAid was signed by leading wildlife charities, wildlife advocates and concerned high profile individuals (including world renowned scientist Stephen Hawking). This letter was hand-delivered for Prime Minister David Cameron's attention to 10 Downing Street on 30 April 2016. International Wildlife Bond (IWB) fully supports and endorses this letter, calling for an immediate and comprehensive United Kingdom ban on lion trophy importation;

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2. In March 2016, a joint declaration letter (co-ordinated by the Born Free Foundation, copy attached at Appendix 2) was signed by IWB and 25 other concerned charities. The letter is entitled *"Wildlife Trophy Imports into EU Countries"* and was delivered to the Environment Ministers of all European Union Member States.

The common theme of both of these letters was that the importation of hunting trophies requires urgent review and action based on the clear, independently verifiable 'science.' When such 'science' is lacking, action must be taken.

The Netherlands<sup>(1)</sup> has already started to move ahead, with an 28 April 2016 announcement by Dutch Secretary of State for Agriculture, Nature and Food Quality, Martijn Van Dam that lion trophy imports will no longer be allowed into the country, with a ban on importing over 200 species of animals including rhino, elephant, cheetah, hippo and polar bear, following the lead clearly set by fellow EU Member State, France.

In the on-line summary of the welcomed United Kingdom Parliament, 24 November 2015 Adjournment Debate, *"African Lion Numbers,"* it was noted that:

1. In my letter (Reference C) I expressed alarm at the suggested Defra *"assessment of the hunting industry"* over a proposed *"two year"* time frame to ascertain if there is *"significant improvement in the performance of the hunting industry"* (Reference *"Reply from Mr Rory Stewart MP, Parliamentary Under-Secretary of State for Environment, Food and Rural Affairs:" Notes of Adjournment Debate "African Lion Numbers," paragraph 5*).
  - a. There simply isn't the time to allow *"the hunting industry"* any more leniency in the face of overwhelming negative evidence, that trophy hunting (particularly of African lions, elephants<sup>(5)</sup> etc.), contributes no scientifically recognisable value to species' conservation.
2. The United Kingdom Government *"will be moving against Zambia and Mozambique"* with regard to lion trophy imports (Reference *"Reply from Mr Rory Stewart MP, Parliamentary Under-Secretary of State for Environment, Food and Rural Affairs:" Notes of Adjournment Debate "African Lion Numbers," paragraph 4*). Has this

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happened yet and if not, why not? Where are such decisions listed for public information/scrutiny?

3. In the Defra letter to me (Reference B) it was stated *"We [Defra] have some sympathy with your view but we also recognises that for many countries the principle of sustainable utilisation of their own natural resources is extremely important and in many cases a critical source of income."* The key word given in this statement is *"sustainable."* Sustainability can only be proven by recognisable, independently derived science. 'Sustainability' is not an option that can be overridden or ignored by a desire for income (and everyone somehow pretends it will not have a negative impact on target species conservation). So, the question is, where the sustainability and science is lacking why is the United Kingdom Government (Defra) seemingly not acting? As is the case with Zambia's lion population and proposed trophy *"off-take,"* plus many other species Zambia seeks to derive *"critical"* income from.

So let's just concentrate on Zambia as an example of the muddled thinking that seems apparent (and can be read-across to many other examples/range states):

4. Zambia recently announced a lion trophy hunting quota for 2016 of 24 lions (announced by Zambia's Minister of Tourism and Arts, Jean Kapata), when there is no clear census of the lion population in country apart from monitored sub-populations 'protected' in national parks.
5. Estimates suggest<sup>(2)</sup> that the monitored lion sub-populations in Zambia's three largest national parks (*Kafue- 264 assessed in 2011, South Luangwa – 94 assessed in 2012, Lower Zambezi – 11-34 assessed in 2009*), might be as low at 307 – 465 lions in total. A lion population of 500 is widely considered the minimum population size (Packer et al., 2011) to sustain an adequate gene pool, and/or survive other overbearing threats, or stochastic events (as being witnessed in South Africa's Kruger National Park lion population and Bovine Tuberculosis)<sup>(3)</sup> having a potentially devastating impact on the population. There is no monitored Zambian sub-population greater than 500 lions.



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6. The South Luangwa lion population is declining<sup>(2)</sup> and not expanding with very low sub-adult and adult male survival rates, combining depletion of adult males with a biologically ageing (senescence) female population. So lion 'dynamics' for successful, sustainable reproduction rates were already 'challenged' before trophy hunters were again permitted to "*harvest*" key pride members. The primary cause of male mortality (2008 – 2012) was considered to be trophy hunting<sup>(2)</sup>, with 46 of the park's male lions killed for trophies (Rosenblatt *et al.*, 2014).
7. There are no reliable counts of lions resident in hunting concessions. It should be noted, that Zambia's hunting concessions (conveniently) border directly onto the 'protected' national parks, with past reports<sup>(2)</sup> of hunters baiting lions out of 'protected' park boundaries in order to obtain their (needless) lion kill/trophy. In the absence of any reliable hunting concession lion population data, the only means hunters can "*harvest*" lions for any given hunting quota ("*off-take*") is by relying on the monitored and 'protected' lion populations in national parks. Therefore, any lion "*off-take*" has no recognisable scientific or 'sustainable' basis - in Zambia it can only be based on known and supposedly 'protected' lion population numbers (and there are not that many lions there either to support such "*off-take*" without significant conservation risks).
8. To further compound the lack of scientific foundation for Zambia's stated lion "*off-take*" of 24 lions set for 2016, the Zambian Government 'chooses' to believe the fantasy that there might be between 1,500 – 2,500 lions in country. However, the Zambian Government/Authorities failed to reply to UNEP-WCMC<sup>(2)</sup> in 2015 on how the Zambian Government had arrived at their 'guesstimate.' It should be noted that quotas are often based, in-part on operators' recommendations – not verifiable science, but on "*operators*" with a vested interest in setting lion population estimates and "*offtake*" quotas high.
9. A hunting quota of 24 Zambian lions (2016) is very close to the "*5% of any scientifically proven population*" (possibly 500, or less in Zambia's case) recommended as a Trophy Hunting quota:

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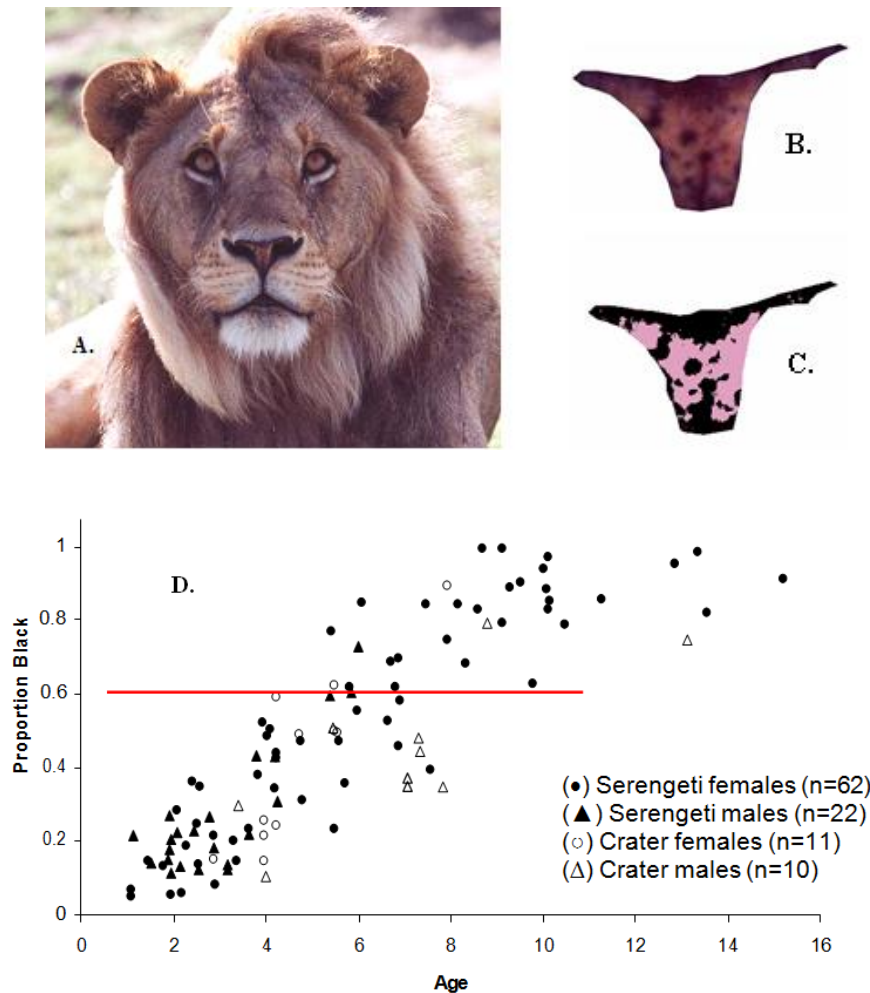
*“for a quota to be considered sustainable for lions, it should be limited to no more than 5 percent of the population” - Creel and Creel, 1997*

10. Does Zambia have any evidence of imposing restrictions on the age/sex of the intended lion “off-take” and how will compliance (pre-lion execution for a trophy please) be ensured and the penalty (assuming there is one) for non-compliance be policed? Furthermore, it should be noted that any age limit (males greater than or equal to six years’ old seems to be the arbitrary recommendation) is not proven, or reliable anyway<sup>(6)</sup>:
- a. A 6 years of age limit assumes the age at which a male lion holds a senior rank (tenure) within a pride is 4 years of age, with 2 further years of reproduction. This assumption has been challenged in studies (Nicholls et al.), which concluded that pride tenure can extend to lions of a mean age of 7.8 years (with evidence of male lions still reproductive and dominant up to 13 years of age and beyond).
  - b. Plus of course, the feasibility of determining any lion’s age from distance, in the field is incredibly unreliable<sup>(8)</sup>, particularly the ‘recommended’ method to hunters and their guides of using a lion’s nose colouration as a key indicator of age (Whitman and Packer, 2007). Aging error in the field using a target lion’s nose pigmentation as the key indicator is a problem<sup>(9)(10)</sup> – how ‘reliable’ or motivated will any hunter be to age their target lion accurately, when interpreting the key lion age indicator is so subjective and unreliable?
    - i. Nose pigmentation  $\geq$  70% - There is a 95% probability the target lion 6 years of age;
    - ii. ii Nose pigmentation  $\geq$  40% - There is only a 62% probability the target lion is 6 years of age.



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Whitman et al. (2004) showed that the lions' noses become increasingly pigmented with age (Fig. 1).... Although the tip of the nose may not be the easiest metric to evaluate in the field, it is a far more reliable indicator of age than the lion's mane<sup>(10)</sup>



**Figure 1.** Age-estimation for adult lions using nose colouration (Whitman, et al. 2004)<sup>(10)</sup>

- A. Identification photograph of a 3 yr old male.
- B. Excised photo of nose tip.
- C. GIS rendering of nose colouration.
- D. Age-change of nose colouration for males and females in two separate populations. Horizontal red line indicates the recommended 60% minimum.

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- c. The predominant killing of pride males lions for trophies has been linked to pride disruption and cases of infanticide, where an incoming dominant male kills the cubs within the pride that he has not directly fathered<sup>(9)(10)</sup>. Therefore, before any male lion is “harvested” for a trophy, the impact must be considered, because the pride’s resilience could be adversely and severely affected.

*“Harvesting of males that are too young can have devastating impacts to the population. If male lions are harvested too young (even as old as 3 years of age), combined with quotas that are too high, the population will be driven to extinction as female populations collapse as they eventually are unable to mate” - Whitman et al., 2004*

- d. As another example, of the potential impact of poor male lion age “harvesting” - in Katavi, Tanzania the estimated lion numbers were recorded as zero in 2014, from a population of 1,118 in 1993<sup>(2)</sup>. It should be noted, that from 2010, 41 adult males (less than five years old) had been “harvested” for trophies in Katavi. Could this excessive Trophy Hunting of young male lions have been the end of the Katavi sub-population?

*“Trophy Hunting was reported to have contributed to population declines outside of (and within some) protected areas of Tanzania (Lindset et al., 2013) and was considered by Packer et al., 2011 to pose the greatest threat to the populations in Trophy Hunting areas.”*

11. European Union’s Scientific Review Group appears (February 2016) to have ignored the information contained in the 2015 report prepared for The European Commission, Directorate General Environment by UNEP-WCMC<sup>(2)</sup> with regard to lion Trophy Hunting. The EU has (for now) agreed to permit lion trophy imports from Zambia (but banned lion trophies from Mozambique). This appears to have been a





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'political' decision rather than any 'scientific' decision, appearing to be in contravention of the EU's own Wildlife Trade Regulations (WTR):

Species listed within the EU's WTR under Annex B should not be hunted "*detrimental to populations of any of the species.*" Furthermore, for any species listed under the EU's WTR Annex A, it must be shown that the hunting of the given Annex A species "*benefited the conservation of Annex A species.*" In a recent Written Declaration<sup>(4)</sup> concluded that these criteria are "*rarely adequately determined.*"

12. This EU 'political' rather than 'scientific' perception is further evidenced by the EU's September 2015 decision to reverse a previous 'negative' decision with regard to elephant trophy imports into the EU from Zambia<sup>(5)</sup>, possibly based on a Zambian Government 'plea' to maintain its hunting income:

*"A May 2015 letter from ZAWA's Acting Director (Kampamba A Kombe) to the EU Directorate General Environment, basically pleading the Zambian's case for seeking much needed income from hunting for local communities (unsubstantiated that this actually happens) and the "positive benefits" (unsubstantiated) for 'conservation' and anti-poaching, plus the local hunting operators that were suffering economic hardship following the "voluntary 2 year hunting" moratorium that had preceded May 2015's letter" - [LionAid \(reporting 16 February 2016\)](#)*

13. In the case of Zambia (and other range States it would seem), it would appear that the EU and perhaps the UK Government (Defra) is allowing a range State's stated 'desire' for "*critical*" income (that has unsubstantiated 'benefits' for any target species conservation) to override sustainability. It would seem that a key word is being overlooked by many parties concerned - "*We [Defra] have some sympathy with your view but we also recognises that for many countries the principle of ~~sustainable~~ utilisation of their own natural resources is extremely important and in many cases a critical source of income.*" If sustainability continues to be conveniently





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'overlooked,' then species decline is inevitable and complicity in perpetuating that decline will be transparent.

## **Conclusions**

I therefore feel compelled to reiterate, the additional time the United Kingdom's Government 'chooses' to spend prevaricating hunting trophy importation (including from Zambia), whilst 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*" remains bewildering.

In Zambia's case, the hunters will happily kill the lion "*off-take*" of 24 (2016) and delude themselves (and continue to try to delude others) that it was all 'legal' and in the noble cause of 'conservation,' when clearly no currently available, independent science can be called upon to verify this pre, or post-killing.

With further study of the plight of the African lion (*Panthera Leo*)<sup>(6)</sup>, it is painfully clear that the time for decisive (unilateral, or otherwise) action on hunting trophy importation (and the needless killing from which the trophies are sourced) is imperative. Clear leadership and a message of intent are urgently needed, for the sake of 'our legacy' for future generations.

The Netherlands<sup>(1)</sup> decided (April 2016) to follow the example set by France and Australia and ban hunting trophy imports. The United States Fish and Wildlife Service approach to the 'Endangered' African lion applied from January 2016 and attempts to ensure 'sustainability' of the hunting source applies to every trophy importation on a case-by-case basis.

I fear the United Kingdom's reputation as a global leader with regard to animal/wildlife welfare is at risk, with the stated stance given at the 24 November 2015 Adjournment Debate, "*African Lion Numbers*" (reiterated at Reference B, with the 'risks' previously highlighted at Reference C). The United Kingdom's stated 'position' to wait for some 'positive' developments to emerge appears increasingly isolated and complacent, when compared with those "*EU colleague*" countries pioneering a more urgent and pro-active approach.

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I trust that the letter (attached at Appendix 1) will encourage reflection and compel a sense of urgent, comprehensive action on the issue of lion hunting trophies (and many other so threatened species) importation into the United Kingdom. But will also urge the United Kingdom to persuade "EU colleagues" and range State partners to support relevant CITES proposals (to CoP17)<sup>(7)</sup>, such as the proposal now tabled to 'uplist' the African lion to CITES Appendix I for example.

Yours sincerely,

Stephen Alan Wiggins

*Founder of International Wildlife Bond (IWB)*

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