



Environment Ministers
European Union Member States

March 2016

Dear Minister,

Wildlife Trophy Imports into EU Countries

The signatories to this letter, representing a wide range of international organisations with an interest in wildlife protection, urge all EU Member States to suspend the issuance of import permits for hunting trophies derived from species listed on the EU Wildlife Trade Regulation appendices (WTR (EC) 338/97)¹.

The killing of Cecil the lion in Zimbabwe in July last year generated a great deal of public outrage and concern about the ethics and sustainability of trophy hunting. We welcome recent decisions by France to ban the import of lion trophies, by Australia to ban the imports of trophies derived from lions and rhinos, and by the USA to include lions on its Endangered Species Act.

Signatories to this letter have written to and met with European Commission representatives in recent months to discuss the EU's processes with regard to trophy imports, although to date we have not had any indication that the current procedures will be constructively reviewed or amended.

EU Member States declared imports of almost 117,000 wildlife specimens as hunting trophies derived from species listed on the CITES appendices in the 10 year period from 2004-2013 inclusive.² Given that many species subject to trophy hunting are suffering significant population declines, and in some cases their future is uncertain, this level of imports needs to be seriously re-evaluated.

Trophies derived from any species listed in Annex A and six species in Annex B of the EU's Wildlife Trade Regulations can only be brought into the EU when the CITES Authority in the importing Member State issues an import permit. Member States are required to ensure that the specimens

¹ http://ec.europa.eu/environment/cites/legislation_en.htm#chapter2

² CITES trade statistics derived from the CITES Trade Database, UNEP World Conservation Monitoring Centre, Cambridge, UK. August 2015.

were obtained legally, the import is not detrimental to the conservation of the species concerned, and in the case of Annex A species that the import will result in *'significant and tangible conservation benefits'*³, before issuing such permits. We are concerned that in practice these requirements are often not fulfilled and import permits continue to be issued for trophies to the detriment of the populations of wild animals from which they are derived.

Guidance adopted by the responsible EU authorities recommends that they consider management regimes in exporting countries when making a non-detriment finding.⁴ In addition, authorities should ensure *'that there are no other factors relating to the conservation of the species which militate against issuance of the import permit'*.⁵ We nevertheless continue to be concerned that many countries which permit hunting and the subsequent export of trophies lack adequate management capacity to monitor hunting operations and compliance with hunting regulations and quotas, suffer from poor governance and corruption, and have no functioning or transparent mechanisms for distributing income from hunting to local communities and conservation authorities.

Lastly, we are concerned that the EU currently limits the requirement for import permits to be issued for species listed on Annex B of the WTR to the six species⁶ that are listed in Annex XIII to Regulation (EC) 865/2006.

We therefore believe that the importation of trophies into the EU is not taking place in accordance with the EU's own guidelines, is contrary to the precautionary principle enshrined in EU policymaking⁷, and poses an additional threat to populations of threatened species.

Given these concerns, we urge all Member States to suspend issuance of all import permits for hunting trophies derived from species listed in the EU Wildlife Trade Regulations at least until a full review of the regime for determining whether import permits should be issued has taken place, taking into account current guidelines and ethical considerations. We also urge Member States to insist that counts of populations from which hunting trophies are derived be undertaken by independent agencies using verifiable methods before any decision is made about sustainability. At present, no such information is available for the majority of populations from which hunting trophies are imported into the EU.

We also call upon Member States to ensure that the requirement for import permits is extended to trophies from all Annex B-listed species.

We thank you for your consideration of this important issue, and we look forward to your prompt response.

³ <http://ec.europa.eu/environment/cites/pdf/srg/guidelines.pdf>

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⁵ Article 4(1)e of EU regulation 338/97 <http://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX:52012PC0403>

⁶ currently (i) Southern White Rhinoceros *Ceratotherium simum simum*, (ii) Common Hippopotamus *Hippopotamus amphibius*, (iii) African Elephant *Loxodonta africana*, (iv) Argali Sheep *Ovis ammon*, (v) Lion *Panthera leo*, and (vi) Polar Bear *Ursus maritimus*

⁷ Article 191 of the Treaty on the Functioning of the European Union <http://eur-lex.europa.eu/legal-content/EN/TXT/?uri=celex:12012E/TXT>

Sincerely,

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