



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

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29 December 2016

Dear Kevin Woodhouse,

The United Kingdom's Importation of Lion Hunting Trophies

Correspondence Reference:

A: DEFRA letter, Ref. DWO403737, dated 26 May 2016

B: *"Hunting Trophy Importation,"* IWB letter, dated 3 May 2016

First of all, may I start by wishing you a 'Happy New Year.'

Thank you for your May 2016 letter (Reference A), which stated that as part of DEFRA's commitment to *"evaluate the available evidence rigorously, the Minister has invited Professor David Macdonald of Oxford's Wildlife Conservation Unit to review existing lion trophy hunting practices with a view to providing recommendations for best practice criteria and recommendations for what the UK, working with our EU and international partners, can do to assist with implementation and best practice."*

On 28 November 2016, Professor Macdonald et al. (WildCRU), released (for public scrutiny), the DEFRA requested "review" by the previous DEFRA Minister, Rory Stewart MP - *"Report on Lion Conservation with Particular Respect to the Issue of Trophy Hunting"* and appendices⁽¹⁾ - (the "Report").

There are many concerns raised by this Report.

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1. Trophy Hunting Industry Reform

1.1. The Report (Para 3.1 and 3.2) reiterates hunting industry reforms that have been 'recommended' for the past decade (or longer).

1.1.1. *"Lease length, allocation and fixed quotas"*

1.1.1.1. Land leases for hunting are often allocated on a short-term basis, incentivising the hunting operator to make short-term profit taking decisions, detrimental to conservation. But recommendations for the hunting industry to reform and redress such negative incentives are nothing new, but stem from over a decade ago.

1.1.1.2. The allocation of lands for hunting are often leased on short (or sometimes long concessions) to hunt operators, with little consideration (Lindsey *et al.* 2007)⁽²⁾ given to the conservation credentials of any given bidder for such leases, but transactions based purely on commercial considerations (ie. the highest bidder). Again, this negatively impacts conservation, but has been a known flaw in the hunting industry in need of reform for a decade.

1.1.1.3. Fixed quotas are where a hunt operator might be forced to pay for government issued permits for 60% or more of potential "*off-take*" of the hunting quota and therefore, have a financial break-even point incentive to hunt and kill close to the quota threshold, rather than an incentive to conserve species numbers per se. The evidence (Packer *et al.* 2006)⁽³⁾ is again, nothing new. There has long been a call for the industry to reform and replace 'fixed' quotas with less conservation damaging 'optional' quotas, with no pre-payment for permits upfront and therefore the risk of an incentive to the hunting operator to rack-up kills to break-even.

1.1.2. *"Restrictions on lions able to be hunted"*

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1.1.2.1. The suggested approach to target lion age restrictions (expanded upon in the IWB letter, Reference B), is based upon work by Whitman et al. that stems from 2004⁽⁴⁾. But still, here the Report is again calling for universal implementation within the hunting industry in 2016 (and no doubt beyond), over a decade later. Does this not show how immovable the hunting industry is in its willingness and ability to evolve?

1.1.2.2. As previously highlighted in IWB correspondence (Reference B), such age restrictions are not ‘risk free’ (in terms of ageing error, or indeed the potential side-effects from any ‘aged’ target’s removal from a pride structure etc.) when applied in the field through either wilful neglect, or otherwise.

1.2. The conclusion from such repeated calls over the past decade for the hunting industry to adopt these same reforms advocated in the Report, must be that the hunting industry remains wedded to short term profiteering in its business model, stifling any ‘conservation’ based reforms that might negatively impinge on that model’s income stream. The ultimate implication being, conservation is low on the list of the hunting industry’s priorities (despite self-proclamations to the contrary). Any expectation or ‘faith’ that the hunting industry will suddenly reform is not widely held.

2. Communities Benefitting from Hunting

2.1. The Report implies that without hunting income trickle down to local communities most exposed to ‘dealing’ with lions/wildlife, then there will be *“hardening negative attitudes toward wildlife...”* and therefore lions/wildlife will be at risk.

2.1.1. Communities actually benefit very little from hunting income and still tolerate wildlife. So the suggestion lions/wildlife will be eradicated by communities solely because of the absence of hunting income trickle down



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seems exaggerated. The income generated to local communities from hunting areas is minimal, estimated at less than 3%⁽⁵⁾ of total hunting income per annum, or equating to an estimated £0.4 (\$0.62 USD)/per annum per 'local community' person (or less)⁽⁶⁾.

2.1.2. For example, Zimbabwe's CAMPFIRE programme (established 1981) was introduced to distribute dividends derived from Trophy Hunting to local communities. In a 2007 study⁽⁷⁾ communities that should have benefited from the CAMPFIRE programme reported that dividend had not been received since 1997, with no discernible additional benefits for employment or improved infrastructure - corruption has eaten away at CAMPFIRE's promise/revenue.

2.1.3. The IUNC (2009) reported⁽⁸⁾ that the economic benefits to local communities of hunting areas are minimal, employment opportunities are poor and the wildlife contained within hunting areas are far less well protected than wildlife contained within protected, non-hunting areas.

3. Lack of Negative Factors and Realistic Threat Assessment of Lion Trophy Hunting

3.1. For example, in regard to Zimbabwe, the Report (page 30 - 31) over-looks the acknowledged illegal killing of Cecil with no resulting prosecutions⁽⁹⁾ of anyone involved. How is that possibly good for acceptable hunting regulation?

3.1.1. There is also recent evidence⁽¹⁰⁾ of lions still being baited out of the protection of Hwange National Park to be "*harvested*" for hunting trophies.

3.1.2. According to a WildCRU's published paper⁽¹¹⁾ regarding lions in Zimbabwe's Hwange National Park, the paper states that 70% (24 of 34 study lions) of mortality of "*tagged*" lions supposedly protected within the park's boundaries was attributable to trophy hunting.



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3.1.3. This is evidenced by WildCRU's own public assessment⁽¹²⁾ and highlights the trophy hunters' interference in pride structures. This interference is evident in Cecil the lion's history and how an alliance with another Hwange lion (Jericho) formed in 2013. Cecil and Jericho were not true 'brothers' - both Cecil and Jericho found themselves deposed from their prides and alone in 2013, successfully teaming-up to form a new dynasty and raising new-offspring. Cecil had been previously deposed by Jericho's coalition, (Cecil losing his true brother and Jericho losing his father in that conflict). Jericho lost all his brothers over subsequent years to trophy hunters and ended up being deposed himself by a rival coalition.....hence, in 2013 Cecil and Jericho were to become a team (brothers by another name) under circumstances not without human interference in their natural pride structures. Jericho is said to have died of natural causes (October 2016) after an eventful life, but his passing just reminds us of Cecil's unnatural/illegal killing by a trophy hunter in July 2015, plus how Cecil's/Jericho's 'team' was formed as a result of Jericho's own loss of brothers to trophy hunters.

3.2. However, despite the trophy hunters' impingements upon lions in Zimbabwe, the Report happily concludes *"...there is little evidence that trophy hunting is negatively affecting Zimbabwe's lion population at a national scale"* without any reference to clear wrong-doing in country. Such tacit acceptance seems to seek to pardon Zimbabwe's hunting regulation flaws.

4. Underestimated Threat of Lion Trophy Hunting

4.1. In a 2016 study⁽¹³⁾, Loveridge et al. concluded *"This study provides evidence for negative impacts of uncontrolled trophy hunting on lion population and behaviour."*

4.2. But there is also a suggestion that the threat assessment given in the Report (Figure 2, page 33) does not give due weight to other 'side-effects' on the target (trophy hunted) lion's surviving pride structure.



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4.2.1. Brent Stapelkamp⁽¹⁴⁾ (Ref. Appendix 1) worked within WildCRU for 10 years on the 'Hwange project' in Zimbabwe. Brent has provided a welcomed, fundamental insight and perspective on that work, identifying patterns in the data that point to trophy hunting having a much wider negative impact; where trophy hunting of key pride members acts as a catalyst driving surviving pride members into human/wildlife conflict.

4.2.2. This suggests that the threat posed by trophy hunting in isolation is clearly underestimated in the Report. The implication being, that trophy hunting contributes directly to make human/wildlife conflict more likely, therefore the threats depicted in the Report need to be combined, thus changing the risk/threat perspective significantly against trophy hunting. Furthermore, the accusation is that the data available to WildCRU that proves that link has been intentionally over-looked perhaps.

5. Recommendations for Lion Trophy Imports

5.1. The element that makes lion trophy hunting the 'best bad option' is that there is no current United Kingdom emphasis for burden of proof that any lion so "harvested" was taken from a sustainable source and/or contributed directly (not by some mere transferring of cash between hands) to independently, scientifically recognisable species' sustainability/conservation.

5.2. The Report (Para 4.3.2.1) calls for the universal implementation of criteria to ensure 'sustainability':

"In order to establish directly that trophy hunting of lions is sustainable, a prerequisite is that reliable, standardised, and independently verifiable surveys are conducted in the hunting area.....Once the lion population has been surveyed the information can be fed into a harvest rate model, such as that proposed by Caro et al. (2009), to calculate an appropriate, scientifically based quota" - The Report, Para 4.3.2.1 - "Best-practice: Lion populations are

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sustainably managed, as determined by professional-standard science-based monitoring.”

- 5.3. Of course, if current lion trophy hunting was based on any recognisable science linked to sustainability/conservation, then all of the stated criteria in the Report at para 4.3.2.1 would already be in-situ. The Report calls again for implementation as a badge of ‘best-practice’ but adherence is unlikely to materialise (if ever) as a universal norm until many more years down the line. There is a fear that such criteria will require substantial funding, but with the burden of proof (as it has always been) on the hunting industry to produce and pay for the ‘independent science’ to support its unsubstantiated claims. The point is, if any leeway is given (again) for the hunting industry to reform and establish adherence to ‘best-practice’ criteria and business (lion trophy hunting) allowed to continue as usual, then lions will continue to be “*harvested*” and ‘best-practice’ non-compliance tacitly tolerated. There needs to be unrelenting pressure for the hunting industry to comply and reform, as it has shown precious little effort to ‘voluntarily’ do so in the past.
- 5.4. Therefore, it’s imperative that decisive and immediate action is now taken to incentivise against known non-compliant sources of lion trophies, sending a clear message and setting the required pressure in motion. The United Kingdom is lagging behind the United States, France, The Netherlands, Australia and Costa Rica’s approaches on the issue (where clear hunting trophy importation standards have been set).
- 5.5. The Report speculates (Para 4.2) that a total ban on trophy hunting imports to “*North America and Europe could increase uptake of trophies by hunters from other countries instead, for example the Middle East and Asia, with possible unintended consequences for conservation and animal welfare.*” The trophy hunting market is open to trophy hunters now from any region/location with/without import restrictions. So it’s hard to fathom how/why ‘uptake’ would suddenly pick-up any resulting ‘slack’ and prove even more detrimental to the conservation prospects of

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target species. If the scare tactics of this speculation is believed, then it promotes a do-nothing attitude and relieves any pressure on the hunting industry to reform and head towards 'best-practice.'

6. Public Sentiment

6.1. The Report speculates (Para 5.1) that it is plausible that 'public sentiment' will make trophy hunting non-viable (ie. by demanding ever-tightening trophy import restrictions) and 'wildlife habitat will be lost as a result:'

".....may contribute to a mood in at least some sections of society that, even if sustainable and a benefit to conservation, hunting lions for sport is a recreation that is not compatible with 21st-century civilization. A plausible speculation is that this opinion will soon prevail (notwithstanding clear cultural differences between East and West, North and South). Insofar as this creates pressure for a ban on trophy hunting it also risks unintended consequences for lion conservation if it causes the marginal value of land previously retained under wildlife use for hunting to fall below that for non-wildlife uses (such as farming), and thus the lion estate to be diminished."

6.2. Of course, human population growth and subsequent demands on the "lion estate" will put increasing economic pressure on wildlife habitat regardless of trophy hunting's presence⁽⁶⁾⁽⁸⁾:

"The hunting industry across sub-Sahara Africa generates an income of approximately \$230m USD per annum. So, that equates to approximately \$230m USD/1.4 million km², or approximately \$164.3/km² (\$1.64/hectare). In contrast, it is suggested agriculture generates 300, to 600 times more per land unit area, so there is undeniable pressure on habitat/land returns as human population growth will increasingly demand (and will look increasingly economically viable) more land use for livestock and agriculture."

6.3. Therefore, trophy hunting will find it increasingly hard to compete financially to support habitat, so alternatives are needed regardless of any "plausible speculation"



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given in the Report at Para 5.1 and the 'fear' intended to dissuade anyone from 'daring' to impose trophy import restrictions on the hunting industry.

7. Contributors

7.1. I understand that Born Free Foundation and LionAid (listed in the Report as "Contributors") were not invited to review a Report draft and/or have their views/input on the subject fairly represented within the Report it would seem, which seriously undermines the Report's professional credibility.

8. Conclusions

I would suggest WildCRU's Report provides a flawed perspective in many respects, overlooking aspects that do not support the Report's premise that hunting 'theory' can be good for lion conservation/sustainability 'if' well-regulated etc.

This hunting 'theory' advocated in the Report is constantly regurgitated, acting as a cloak to cover the historical lack of compliance that is still 'enjoyed' by the hunting industry (and its short term profit taking often to the detriment of 'sustainability/conservation'). The 'true' threats these hunting deficiencies pose are seemingly under-estimated in the Report - independent scientific evidence to back the hunting 'theory/mantra' and its claims remains opaque and elusive.

The 'do nothing option' does not exist. The hunting industry needs external pressure, such as trophy hunting import ban/restrictions based upon an independently scientifically proven, direct contribution to target species' sustainability/conservation (not just some cash payment to 'offset' the negative impacts of trophy hunting and gain access to trophy importation by other means). The hunting industry needs such pressure it seems to even consider reforms that might be detrimental to the industry's dedication to short term profit taking and on-going "harvesting" in the absence of supporting science.

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Regardless of the hunting industry perhaps universally acknowledging a need to reform, there needs to be a credible alternative back-up plan to 'protecting' key habitat, because it's "*plausible*" trophy hunting will not survive due to the public no longer accepting trophy hunting as socially acceptable in the 21st century. But, also increasing human populations demands will make 'hunting habitat' a non-commercially viable proposition in many areas when compared to agricultural use (unless the habitat is otherwise protected).

Therefore, alternative habitat protection approaches (encompassing international consensus and commitment) are needed regardless if key wildlife species are to continue to share this planet, gracing natural (protected) habitat for the viewing pleasure of future generations.

Yours sincerely,

Stephen Alan Wiggins

Founder of International Wildlife Bond (IWB)

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References:

1. *"Report on Lion Conservation with Particular Respect to the Issue of Trophy Hunting"* and appendices, Professor David Macdonald (Director of WildCRU) et al., Wildlife Conservation Research Unit (WildCRU), dated 28 November 2016
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Appendix I - Brent Stapelkamp's (ex-WildCRU project in Hwange, Zimbabwe)

7 December 2016

Comments on WildCru's report on lion hunting!

Much has been said about the recently released report on Lion hunting by WildCRU and I have added my comments here in the hope that the British government get to hear another perspective. Here it is!

I must say that I found the report heavily hunting biased and I don't see that it so much *"grasping the moment to create a movement"* as much as *"grasping the moment to maintain the momentum."*

Where the author says that he and his co-contributors are neither *"pro"* nor *"anti-hunting"* but *"pro-fact"*, I feel the report lands on the pro-hunting side purely because it doesn't take into account all of the facts.

During my decade or so with the WildCRU project in Hwange, specializing in the conflict mitigation but having a central [role] in the ecological study as well as the trophy hunting one, I have been at the coalface and feel I have a deeper appreciation of these facts than the data may show. Years ago for instance I spotted a pattern that occurs after a pride male is trophy hunted on the park boundary. Within a few short weeks new male/males appear and the females within that territory have two choices. The first is that they stand and fight in which case they are either killed themselves or their Cubs are and that is the infanticide that the report describes. From my experience of Hwange, that rarely happens for the lionesses are typical mothers and rather flee with their Cubs. They have nowhere else to go (within the park all territories are full of potential cub killers) but out of the park and amongst people. There they kill livestock (for want of wild prey) until either they die or their Cubs do and the survivors return to the park and settle with the new males. They conceive and all is well until....you guessed it! The next hunting season has started. And the process repeats itself. I know that WildCRU have these data as I was the man instructed to collar all adults in the story chain year in and year out so that we could record this effect and publish

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it. There are lionesses in some areas that have had 4 or more litters and never raised a single cub to adulthood being stuck in this trap. Where the author repeatedly says that trophy hunting isn't the main source of mortality to lions (despite Loveridge finding it was in western Zimbabwe in 2016) it is certainly a driver of conflict! If indeed it drives conflict then the data shown in Figure 2 (lion threats ranked) can be looked at with fresh eyes. Imagine then if we took the trophy hunting data and added it to the conflict!

We have seen this pattern elsewhere in Zimbabwe and I urge you all to have a look at your conflict peaks with fresh eyes and see if a pride male was hunted just prior to it.

I have lived this pattern for years from shaking the happy American's hand in the skinning shed while collecting the collar to going to meetings where every villager is armed with an axe because he heard "*the owner of the lions is here!*" The conflict can be severe and last several months and the damage that does to the lion's image is immeasurable. No wonder Mr Nzou (referenced in the report) said we don't cry for lions and the author uses that (as many hunters here do) to justify lion hunting.

I don't think that all the facts are being considered!

The author goes onto say there is little evidence that trophy hunting substantial negative effects at a national and regional level, and where it is well regulated and devotes sufficient authority to the land owners has the potential to contribute to lion conservation. Is that lack of evidence because of a weakness in the data collection or because of a bias towards analysis of data that pleases the issuer of your permits? Over the years I know that parks permits were always the worry and indeed "*rocking the boat*" was seen as jeopardizing them plus there were long periods without permits where no monitoring was happening for up to a year at a time. To put too much emphasis on the [seeming] lack of evidence again is missing the point.

Surely Zimbabwe is viewed as "*one of the well-regulated ones?*" A country that the British government itself describes as one of the most corrupt countries in the world? A place where the Land owners are given "*sufficient authority*" over its management and yet here we debate -post Cecil!

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My point is even in the best example we can't manage lion hunting properly so we should go with the cautionary principle and stop it immediately before we lose our lions.

Bubye Valley Conservancy is promoted as a successful example in the appendices because they have seen "*an exponential increase*" in lion numbers there. The management of the Bubye, as well as the report, make it clear that there is no viable alternative to hunting but go onto say that they have a higher lion density than anywhere else in Africa! I had a personal attack from a hunter at Bubye who told me that he sees 3 or 4 prides of lions in a day there without telemetry, not to mention the rhino and the elephant and the wild dogs etc. sounds to me like the best possible photographic safari location don't you think?

I wrote a fun little piece called "*the quality street theorem*" that, if you google it, will explain my understanding of hunters' attachment to lion hunting.

I argued with the hunter from the Bubye that where his only measure of successful lion management was numbers or density it was not a successful example in my opinion. I told him that a double fenced area was never going to be repeatable over African lion range and that fortress conservation doesn't work. The author mentions the fact that the human population will virtually double in the next few decades and that that would mean more pressure on resources and I agree but to me places like Bubye are desperately vulnerable to other pressures not mentioned in the report. With a population increase coming, politicians will be under pressure to satisfy land hungry voters and what is more vulnerable to the whims of those politicians than an elitist white enclave that only benefits their elitist clients? Look at the Save conservancy!

If lions are to survive this tidal wave coming we need to blur the lines not redefine them and we do that, not by supplying thousands of kilograms of meat a month to the people but by involving them in not only the profits but the decision making!

Bubye should not be lauded as a success in a modern African context.

And finally the Author references Campfire and says that [findings] suggest that if trophy hunting was to become unviable in Zimbabwe that thousands of households would lose [their] benefits from the scheme. Campfire is a "*four letter word*" here on the peripheries of



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the protected areas precisely because the people see no benefit whatsoever. To mention campfire in a community meeting is to invite being chased away with sharp objects! The corruption so deeply entrenched in our wildlife policies and systems [it] is going to take years to sort out and honestly speaking our lions don't have the luxury of time!

Let's use the precautionary principle and find alternatives. Let's create a movement and not maintain the momentum.

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