



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

Dr Dan Poulter MP
House of Commons
Westminster
London
SW1A 0AA

18 November 2018

Dear Dr Dan Poulter MP,

Hunting Trophy Importation into the United Kingdom

Correspondence Reference:

- A. IWB letter to DEFRA 'Ivory Policy Team,' "*United Kingdom 'Ivory Bill 2018,'*" dated 15 November 2018 – copy attached
- B. DEFRA 'Ivory Policy Team' letter to IWB, dated 13 November 2018 – copy attached
- C. IWB letter to Dr Dan Poulter MP, "*The United Kingdom Ivory Trade,*" dated 12 August 2017
- D. IWB letter to Dr Dan Poulter MP, "*The United Kingdom Ivory Trade,*" dated 1 February 2017

I have previously sent letters to you as my Member of Parliament regarding the United Kingdom's (UK's) ivory trade (Correspondence References C and D). The United Kingdom Government is now in the process of passing legislation^{[1],[2]} to curtail the vast majority of ivory trading within the UK's borders. This legislation is warmly welcomed by those that wish to see elephants protected in the wild from poaching and exploitation for modern ivory.

On the related subject of trophy hunting (another driver for attrition of many species) there is an ongoing review of the UK's hunting trophy importation criteria. I wish to draw your attention to the Early Day Motion (EDM) 1829, "*Trophy Hunting,*" tabled by Zac Goldsmith, 13 November 2018:

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“That this House notes with concern that hundreds of hunting trophies have been imported into the UK in recent years, including from species threatened with extinction such as elephants, lions, hippopotamuses, leopards and rhinoceroses; further notes that trophy hunting is having a negative effect on wildlife through the loss of significant numbers of healthy individuals that are key to the survival of rapidly declining populations, that unsustainable rates of trophy hunting have caused some populations of Africa's big cats to decline, and that hunting and poaching of elephants is outpacing their rate of reproduction; considers that trophy hunting is cruel, immoral, archaic and unjustifiable, and can act as a cover for illegal poaching; further considers that a global end to trophy hunting is desirable, and that nature tourism is a humane and more effective means of conserving wildlife and supporting local communities; and calls on the Government to commit to halting imports of hunting trophies as a matter of urgency” – EDM 1829^[3], 13 November 2018

I also recently received a letter (Correspondence Reference B) from the Department for Environment, Food and Rural Affairs (DEFRA) ‘Ivory Policy Team’ on the specific subject of elephant hunting trophy imports into the UK. This DEFRA letter suggests that the whole issue of trophy hunting and hunting trophy imports are under review:

“The Government takes conservation of endangered species seriously. We are currently looking carefully at the issue of trophy hunting and associated imports to ensure that trophy imports to the UK do not impact on the sustainability of endangered species.”

I have attached a copy of my response (Correspondence Reference A) to DEFRA’s letter of 13 November 2018. My response outlines why trophy hunting lacks credible, independent and irrefutable evidence that the vast majority of trophy hunting of Vulnerable, Threatened and Endangered species has any notion of a recognisable and proven conservation imperative.

The UK system for hunting trophy importation requires an import permit based upon assessment by the UK’s Joint Nature Conservation Committee (JNCC) – the UK’s Convention on International Trade in Endangered Species of Flora and Fauna (CITES) Scientific Authority. The JNCC makes an assessment to ascertain if a given hunting trophy has been legally obtained and if the hunting trophy passes ‘sustainability criteria’ *“to confirm that the trade*

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will not be detrimental to the conservation of the species concerned" - Correspondence Reference B. However, many conservationists have a great deal of concern about the implied reliance upon CITES itself, the 'science' used by source countries exporting hunting trophies and the credibility of the whole hunting ethos/theory of "if" well regulated, hunting somehow equates to conservation. These claims often remain unscrutinised for any genuine conservation imperative - CITES and trophy hunting cloaked behind a banner of 'sustainable utilisation.'

It should be noted that 'sustainable utilisation' is an abused and manipulated umbrella term for many commercial wildlife/animal exploitative activities that have no species conservation imperative whatsoever. It should also be noted that CITES is not a conservation body, but a convention for trade facilitation in endangered species:

"CITES deals with international trade, it is not there to deal with the conservation of species in situ – there is a great deal of misunderstanding about that," John Sellar, formerly chief of enforcement for CITES^[4]

With regard to the notion proffered of 'sustainable utilisation' to justify trophy hunting, there is often no independent, current science that categorically supports trophy hunting attrition of Vulnerable, Threatened and Endangered species on a continent-wide basis. The quotas set for trophy hunting are set at the macro, range/country level, but often with no categorical supporting science, just an over-reliance on an outdated and unreliable theory:

"well-manged and sustainable trophy hunting is consistent with and contributes to species conservation, as it provides both livelihood opportunities for rural communities and incentives for habitat conservation, and generates benefits which can be invested for conservation purposes" – Correspondence Reference B

Overwhelmingly such hunting quotas appear to be driven by commercial and entrepreneurial incentives. Trophy hunting quotas are set based upon range/country specific speculation on



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target populations (that are often migratory) and extrapolation from poor, outdated data sets – often with exaggerated claims that there must be 'plenty left to kill' (and profit from):

An example of such flawed/biased 'thinking' was evident in 2011^[5] when in partnership with a pro-hunting lobby group, Safari Club International (SCI), Namibia launched a census *"to manage the sustainability of the leopard population."* A questionnaire was distributed to 1,500 farmers to assess the distribution and relative abundance of leopards throughout Namibia. There were only 400 replies. These, however, were extrapolated, which produced a flawed national estimate of leopards of over 14,000 leopards. The reality is, leopards are elusive and difficult to accurately count^[6] with population densities per square kilometre estimates (based on available habitat surveys, prey availability estimates, camera trap sightings etc.)^{[6],[7]} being the recognised scientific methods to establish estimated leopard populations. The species faces many threats including habitat loss and fragmentation, retaliatory killing due to conflict, plus of course poorly managed trophy hunting. According the IUCN's 2015 assessment^[5], across the majority of the African range, leopards have declined substantially (>30%) since the previous assessment.

Namibia still maintains a CITES trophy hunted export quota of 250 leopards per year^[8], a questionable figure, according to experts of the International Union of Conservation of Nature (IUCN), because it is based on *"insufficient ecological information and lack of scientific data"*^[5].

Therefore, as my MP, I hope to see your signature added to this referenced EDM 1829^[3] very soon and the whole hunting trophy importation process into the UK reviewed as a matter of urgency to ensure scrutiny for proven, independent scientific evidence to support the notion that such *"trade will not be detrimental to the conservation of the species concerned."*

Yours sincerely,

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References:

1. "Ivory Bill 2018," Department for Environment, Food and Rural Affairs (DEFRA) - <https://www.gov.uk/government/publications/ivory-bill-2018>
2. "Ivory Bill 2017-19," Parliamentary Business - <https://services.parliament.uk/bills/2017-19/ivory.html>
3. "Trophy Hunting," Early Day Motion 1829, Zac Goldsmith, 13 November 2018 - https://www.parliament.uk/edm/2017-19/1829?fbclid=IwAR34suoSjSdIAr0-akaqwTyVDjEso_I0_1xOXI1HnXiGhdOj8PBZ2Ryx_4Y
4. "CITES species meeting: 'The only game in town'," 23 September 2016, BBC News - <https://www.bbc.co.uk/news/science-environment-37389229>
5. "Hunters hold African wildlife to ransom," Africa Geographic, 15 November 2015 - <https://africageographic.com/blog/hunters-hold-african-wildlife-ransom/>
6. "The African Leopard, Ecology and Behaviour of a Solitary felid," Theodore N. Bailey, Reprint Edition 1993, Blackburn Press, ISBN-10:1-932846-11-5, ISBN:13: 978-1-932846-11-9
7. "Leopard population and home range estimates in north-central Namibia," Andrew B. Stein, Todd K. Fuller, Stephen DeStefano, Laurie L. Marker, May 2011, African Journal of Ecology, Wiley Library - <https://onlinelibrary.wiley.com/doi/pdf/10.1111/j.1365-2028.2011.01267.x>
8. CITES listings, Species+, "Legal" - https://speciesplus.net/#/taxon_concepts/8619/legal