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Ivory Team

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Dear Mr Wiggins

Thank you for your letters of 24 April and 16 August in response to the proposed United Kingdom ivory ban and specifically elephant hunting. I apologise for the lengthy delay in replying and please accept this letter as a reply to both pieces of correspondence.

International trade in hunting trophies is controlled under the Convention on International Trade in Endangered Species (CITES), of which the UK is a party and is implemented in the UK through EU Wildlife Trade Regulations. CITES allows the import and export of animal parts of listed species killed through hunting in their country of origin if the exporting country is satisfied that the hunt was legal and sustainable.

Import controls are currently implemented at an EU-wide level and stricter controls on the import of six species subject to hunting, including African elephants, were introduced in 2015. The UK will only issue an import permit if it is satisfied that the trophy has been legally acquired and the Joint Nature Conservation Committee (JNCC), the UK's CITES Scientific Authority, makes an assessment against sustainability criteria to confirm that the trade will not be detrimental to the conservation of the species concerned. Import of elephant hunting trophies into the EU is only possible for non-commercial purposes for an individual's personal use. This means that such hunting trophies should remain the property of the owners after import and they cannot be sold or used otherwise for commercial purposes. The UK already has a ban on the sale of raw ivory, so anyone attempting to introduce ivory into the market in this way would be committing a criminal offence.

Whilst, there are examples of the negative effects of trophy hunting caused by poor or inappropriate management, trophy hunting *per se* is not seen as a key driver of wildlife decline, especially of large African mammals. Declines of these species are largely driven by habitat loss and degradation, competition with domestic livestock, illegal or uncontrolled poaching for meat and trade in their products (ivory, horn, etc.), and retribution killing for human-wildlife conflict.

CITES recognises that "well-managed 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". The UK does recognise that in certain limited and rigorously controlled cases, scientific evidence shows that trophy hunting can be an effective conservation tool, supporting local livelihoods and attracting revenues for other conservation activities.



The Government takes the 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.

Our international work to tackle the illegal wildlife trade fits within four strategic pillars agreed at the London 2014 conference: 1) eradicating the market for illegal wildlife products; 2) ensuring effective legal frameworks and deterrents; 3) strengthening law enforcement; 4) providing sustainable livelihoods and economic development. Combatting elephant poaching is a crucial part of that work. Since 2015 we have funded the MoD to deploy British military personnel to Gabon and Malawi to train park rangers in more effective and safer counter-poaching techniques. We also recognise that human-wildlife conflict has been an important factor in elephant killings. In response, we have given money through Defra's IWT Challenge Fund to a number of projects that seek to reduce human-wildlife conflict, including a few specifically focused on reducing human-elephant conflict. The projects deal with the creation of alternative livelihoods and making wildlife an economic asset for local communities.

We recognise that, by banning the trade in elephant ivory, there could be an unintended consequence of trade displacement onto other ivory bearing species, such as hippopotamus, putting those species under greater risk. The Government has committed that the Secretary of State will conduct an evidence gathering exercise (for example, a public consultation), on or as soon as practicable after the Ivory Bill receives Royal Assent. This evidence gathering exercise would seek evidence in order to assess the impacts of extending the scope of the Ivory Bill to other ivory-bearing species. It is only with such evidence that an informed decision can be made on if the scope of the Bill should be extended to any other species or not. More details on this announcement can be found here: <https://www.gov.uk/government/news/ivory-ban-could-protect-hippos-walruses-and-narwhals>. We will ensure that evidence gathering work on other ivory bearing species will not impact on our timetable to implement the elephant ivory ban.

As result of a Government amendment to the Ivory Bill in the House of Commons, it would be possible to extend the scope of the ban to any ivory bearing species, not only those listed on CITES, subject to an evidence gathering exercise. The delegated power within the Bill which allows the Secretary of State to consult on the extending the scope of the Bill to cover other ivory-bearing species does not include the power to extend the Bill to hunting trophies.

We would very much appreciate your input during the consultation process.

Yours sincerely,

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