

FOR PEOPLE. FOR WILDLIFE. FOR EVER.



Rt Hon Michael Gove MP
Secretary of State for Environment, Food & Rural Affairs

Friday 17 May, 2019

Re: Trophy Hunting

Dear Mr Gove:

Thank you once again for calling and hosting the Stakeholder Roundtable on this very important issue this week, and for the very kind invitation extended to me to attend and present evidence.

You heard about multiple peer-reviewed studies demonstrating the negative impacts of trophy hunting on species. There was no such evidence presented in support of positive conservation impacts. This should not come as a surprise. To quote a US Congressional report: **“Claiming that trophy hunting benefits imperilled species is significantly easier than finding evidence to substantiate it”**.

In addition, you heard the conclusions of research indicating that benefits to local communities are limited, and often non-existent. In an editorial entitled ‘Trophy hunting no longer pays its way’, *Africa Geographic* states: **“The absence of the economic profitability of trophy hunting confirms that consumptive management cannot generate sufficient revenues to conserve nature”**.

Wildlife species today face a multitude of threats and challenges. These are likely to intensify. Trophy hunting is an additional, and avoidable, source of pressure on threatened populations.

Trophy hunting not only removes substantial numbers of animals – 10,000 trophies of lions were taken in the past decade; 20,000 or fewer lions remain in the wild – it removes vital genetic resources. Recent research has highlighted the decreasing average tusk size observed in African elephants, and that there may be as few as 50 ‘Big Tuskers’ left. The genetic diversity of the African lion has fallen by 15% over the past century. According to a recent study, removing just 5% of remaining adult healthy males may be enough to tip the species over the brink.

It is the position of many conservationists that declines in iconic species can only be arrested through a mix of interventions which include halting trophy hunting. This would give time for species to stabilise and for other measures to take effect. In our report “Trophy Hunting and Conservation” we show how bans, moratoria, quota cuts and similar measures have been effectively used as a response to conservation concerns about the impact of trophy hunting on species populations. If such measures were a threat to conservation, as has been suggested by supporters of trophy hunting, they would not have been considered. Instead, they been shown to significantly relieve pressure on declining populations. In no case have they had the opposite effect.

The suggestion that trophy hunting can serve as a proactive conservation tool lacks credibility and is contradicted by the evidence. Iconic species preferred by hunters are in serious decline across the board. No self-respecting conservationist is calling for the (re)introduction of trophy hunting as a conservation measure to protect or recover populations of Amur leopards, Great Apes or pangolins.

The US Congressional study referred to earlier, arguably the most comprehensive review of all the available scientific data, found: **“it is difficult to conclude any trophy import would enhance the survival of the species”**. I therefore believe it is time for the default position on this issue to be reversed. Currently there is no requirement for clear evidence of the conservation benefits of importing a trophy being proven prior to the issuance of an import permit. On conservation grounds alone, without such clear and incontrovertible evidence, the position of the government should be that no permit can be issued.

There are clearly some species for which there are very serious and immediate concerns with respect to the impact of trophy hunting on species conservation. In recent years, hundreds of hunting trophies of CITES Appendix I species have been imported into Britain. CITES states that trade in Appendix I species is strictly prohibited. Strangely, the restrictions do not apply to trophy hunters. Stopping imports of such trophies would in effect merely close what is an inexplicable and indefensible loophole.

The U.K. has also seen the import of trophies of species classified in the IUCN Red List as ‘critically endangered’, such as the Addax and Dama gazelle. Indeed the U.K. has granted import permits for trophies from species that are extinct in the wild, such as the Scimitar horned oryx. It is difficult to see how the import of trophies of the Addax (population 30-90) or the Dama gazelle (population 100-200), let alone of extinct species, can be supported on conservation or any other grounds.

There was apparent unanimity in the meeting in respect of canned hunting trophies. Virtually all lion trophies imported into Britain are now from captive facilities in South Africa. It appears that a ban on such imports has the support of the trophy hunting industry in the U.K.

In your invitation, you asked if there were other direct or indirect implications of trophy hunting that should be taken into consideration. One very important point I would raise is the issue of animal welfare. Studies have shown that up to 50% of animals shot by trophy hunters are wounded, and not immediately killed outright. The case of Cecil – who took 11 hours to die – is not uncommon. In some instances, it takes days before a wounded animal is caught and finally ‘dispatched’.

The incidences of wounding may be increasing due to the awarding of prizes by the trophy hunting industry which encourage the taking of trophy animals with handguns, muzzle-loaders, and bow and arrow (even for the ‘African Big Five’). Animals targeted by trophy hunters tend to be shot from a distance. They have small kill shot ‘windows’. Trophy hunters avoid brain shots that would result in instantaneous death as this might spoil the ‘aspect’ of a trophy, or potentially decrease its likelihood of entering into the Record Books of one of the main trophy hunting associations.

Another point to consider is the impact of trophy hunting on poaching. It has been suggested (without supporting evidence) that trophy hunting can deter poaching. In fact many of the countries with major trophy hunting industries also suffer from very serious poaching problems. There are several reasons for this. Trophy hunting permits have been used on many occasions by poachers to traffic hundreds of millions of dollars’ worth of rhino horn, for instance. A recent trial of a wildlife trafficker found almost a quarter of the horns had been obtained using legal trophy permits.

It clearly sends mixed messages to local communities when they see a rich foreigner hunting a species for 'sport' that they are forbidden to touch for food, even in situations of desperation. Such contradictions can only fuel resentment which in turn increases the likelihood of poaching.

Moreover, the low revenues generated by trophy hunting operations in support of anti-poaching activities – just 8 cents per hectare in the case of Tanzania – are dwarfed by the \$14 per hectare invested in Kenya, which banned trophy hunting in 1977. Kenya's nature tourism industry has boomed since implementing the ban and now makes up 15% of GDP. Trophy hunting contributes just 0.03% of GDP in Tanzania, a country where hunting concessions make up 26% of the land area. Kenya is one of the few countries – alongside Botswana, which banned trophy hunting in 2014 – which has seen a growth in elephant numbers in recent years.

I have focused here primarily on the questions of conservation and economic considerations which you asked us to address. I would, however, also wish to raise the very important moral and ethical dimension which I believe must be considered with respect to trophy hunting.

I believe - as I think do the great majority of voters - that killing animals for entertainment is simply not acceptable in modern society. The government is to be applauded for having taken bold positions on the ivory trade; on increasing sentences for cruelty to animals including for the terrible 'sport' of dogfighting; and on the use of animals in circuses. It seems particularly incongruous, therefore, having taken such positive steps on these matters, that the government still continues to support the killing of defenceless animals purely for amusement - especially when many of them are increasingly at risk of extinction.

I understand that you plan to host further roundtables on this issue. I would respectfully urge you to act as swiftly as possible in view of the fact that the new trophy hunting season has now commenced. I and my colleagues will of course be happy to assist further in whatever way we can to support positive policy reform on this subject.

Yours sincerely,

Eduardo Goncalves

Eduardo Gonçalves

Founder, Campaign to Ban Trophy Hunting