



Department of the Interior  
U.S. Fish and Wildlife Service

**Federal Fish and Wildlife Permit Application Form**

Return to: U.S. Fish and Wildlife Service  
Division of Management Authority (DMA)  
Branch of Permits, MS: IA  
5275 Leesburg Pike  
Falls Church, VA 22041-3803  
1-800-358-2104 or 703-358-2104

Type of Activity: Zimbabwe lion/Bubye Valley  
**IMPORT OF SPORT-HUNTED TROPHIES**  
(Appendix I of CITES and/or **ESA**)

RECEIVED APR 3 2020

Bubye Valley Conservatory

Complete Sections A or B, and C, D, and E of this application. U.S. address may be required in Section C, see instructions for details. See attached instruction pages for information on how to make your application complete and help avoid unnecessary delays.

A. Complete if applying as an individual			
1.a. Last name <u>GUERRIERI</u>	1.b. First name <u>GARY</u>	1.c. Middle name or initial <u>LEE</u>	1.d. Suffix
2. Date of birth (mm/dd/yyyy) <u>(b) (6)</u>	3. Telephone number	3.a. Alternate telephone number	4. E-mail address

B. Complete if applying on behalf of a business, corporation, public agency, Tribe, or institution			
1.a. Name of business, agency, Tribe, or institution		1.b. Doing business as (dba)	
2. Tax identification no.		3. Description of business, agency, Tribe, or institution	
4.a. Principal officer Last name	4.b. Principal officer First name	4.c. Principal officer Middle name/initial	4.d. Suffix
5. Principal officer title		6. Primary contact name	
7.a. Business telephone number	7.b. Alternate telephone number	7.c. Business fax number	7.d. Business e-mail address

C. All applicants complete address information					
1.a. Physical address (Street address; Apartment #, Suite #, or Room #; no P.O. Boxes) (If Broker or Taxidermist is applying on behalf of a foreign national, provide a block; U.S. hunters must provide their U.S. address) <u>(b) (6)</u>					
1.b. City <u>VENETIA</u>	1.c. State <u>PA.</u>	1.d. Zip code/Postal code: <u>(b) (6)</u>	1.e. County/Province	1.f. Country <u>U.S.A.</u>	
2.a. Mailing Address (include if different than physical address; in block)					
2.b. City	2.c. State	2.d. Zip code/Postal code:	2.e. County/Province	2.f. Country	

D. All applicants MUST complete	
1. Attach check or money order payable to the U.S. FISH AND WILDLIFE SERVICE in the amount of \$100, nonrefundable processing fee. Federal, Tribal, State, and local government agencies, and those acting on behalf of such agencies, are exempt from the processing fee -- <b>attach documentation of fee exempt status as outlined in Instructions.</b> (50 CFR 13.11(d))	
2. Certification: I hereby certify that I have read and am familiar with the regulations contained in <i>Title 50, Part 13 of the Code of Federal Regulations</i> and the other applicable parts in subchapter B of Chapter I of Title 50, and I certify that the information submitted in this application for a permit is complete and accurate to the best of my knowledge and belief. I understand that any false statement herein may subject me to the criminal penalties of 18 U.S.C. (b) (6)	
Signature of applicant/Principal Officer for permit (No photocopied or stamped signatures)	Date of signature (mm/dd/yyyy) <u>3/17/2020</u>

Please continue to next page

**E. IMPORT OF SPORT-HUNTED TROPHIES (Appendix I of CITES and/or ESA)**

**Note 1:** This form should be used to request authorization to import trophies of species listed on Appendix I of CITES and/or as threatened or endangered under the ESA (examples include elephants, lions, cheetahs, wood bison, and markhor).

**PLEASE USE FORM 3-200-19 FOR SOUTHERN AFRICAN LEOPARD TROPHIES AND SOUTHERN WHITE RHINOCEROS TROPHIES TAKEN IN NAMIBIA.**

**Note 2:** If you hold an import permit for trophy/trophies that you did not use, please **return the unused original permit**. If you are requesting reissuance of a permit because you have taken a trophy, but were unable to import it prior to the expiration of the permit, please use the renewal form ([3-200-52](#)) and return your original permit with that form.

**Note 3:** Applications for species listed as endangered under the U.S. Endangered Species Act are published in the **Federal Register** for a 30-day public comment period. Please allow at least **90 days** for the application to be processed.

**Note 4:** *Sport-hunted trophy* is defined at [50 CFR 23.74](#) as follows: *Sport-hunted trophy* means a whole dead animal or a readily recognizable part or derivative of an animal specifically identified on the accompanying CITES document that meets the following criteria:

- (1) Is raw, processed, or manufactured;
- (2) Was legally obtained by the hunter through hunting for his or her personal use;
- (3) Is being imported, exported, or re-exported by or on behalf of the hunter as part of the transfer from its country of origin ultimately to the hunter's country of usual residence; and
- (4) Includes worked, manufactured, or handicraft items made from the sport-hunted animal only when:
  - (i) Such items are contained in the same shipment as raw or tanned parts of the sport-hunted animal and are for the personal use of the hunter;
  - (ii) The quantity of such items is no more than could reasonably be expected given the number of animals taken by the hunter as shown on the license or other documentation of the authorized hunt accompanying the shipment; and
  - (iii) The accompanying CITES documents (export document and, if appropriate, import permit) contain a complete itemization and description of all items included in the shipment.

**Note 5:** Certain hunting trophies, including elephants, are subject to restrictions on their use after import into the United States. Please see 50 CFR 23.55 for more information or contact the Division of Management Authority.

Please provide the following information. Complete all questions on the application. Mark questions that are not applicable with "N/A". If needed, use a separate sheet of paper. On all attachments or separate sheets you are submitting; please indicate the application question number you are addressing. If applying for more than one trophy, be sure to answer questions 1-6 for each trophy addressed in this application. If importing trophies from more than one country, you must submit a separate application for each shipment in order to obtain separate import permits.

1. Name and address where you wish the permit to be mailed, **if different from page 1**. If you would like expedited shipping, please enclose a self-addressed, pre-paid, computer-generated, courier service airway bill. If unspecified, all documents will be mailed via regular mail through the U.S. Postal Service.

GARY LEE GUERRIERI

(b) (6)

VENETIA, PA. (b) (6)

2. Who should we contact if we have questions about the application (name, phone number, and e-mail)?

GARY LEE GUERRIERI, (b) (6)

3. Have you or your client (if a broker applying on behalf of your client), been assessed a civil penalty or convicted of any criminal provision of any statute or regulation relating to the activity for which the

application is filed; been convicted, or entered a plea of guilty or nolo contendere, for a felony violation of the Lacey Act, the Migratory Bird Treaty Act, or the Bald and Golden Eagle Protection Act; forfeited collateral; OR are currently under charges for any violation of the laws mentioned above?

No X Yes \_\_\_\_\_

If you answered "Yes" to Question 3, provide: a) the individual's name; b) date of charge; c) charge(s); d) location of incident; e) court, and f) action taken for each violation. Please be aware that a "Yes" response does not automatically disqualify you from getting a permit.

4. For each trophy to be imported, provide:

a. Scientific name (genus, species, and, if applicable, subspecies) and common name.

Panthera Leo (African lion)

b. Sex (if known). MALE

5. IF ANIMAL IS CURRENTLY LIVING IN THE WILD, please enter the following information:

a. Country and place (area, region, GIS coordinates, ranch, conservancy, management area, or hunting block, AND nearest city) where wildlife is to be taken from the wild:

Bubye Valley Conservancy, Zimbabwe

b. Date wildlife is to be hunted: June 8-28, 2020

b. Name of hunting outfitter, safari company, or professional hunter you will be hunting with:

Mazunga Safaris, Pete Fick

6. IF THE TROPHY HAS ALREADY BEEN TAKEN, please enter the following: N/A

a. Country and place (area, region, GIS coordinates, ranch, conservancy, management area, or hunting block, AND nearest city) where trophy was removed from the wild:

b. Date wildlife was hunted:

b. Name of hunting outfitter, safari company, or professional hunter you hunted with:

c. The current location of the trophy (address and country) [the U.S. import permit will identify this country as the country of export/re-export and must match with the export/re-export document]:

7. Please provide a copy of any applicable foreign government permits or licenses that were required to remove this animal from the wild (if you have not hunted yet and do not currently hold any such permits or licenses, please indicate so). Have not hunted yet and do not hold

such permit currently.

8. Complete name and address of overseas person or business shipping the trophy to you. If you are applying to import a trophy directly from Namibia, you **must** provide the name and address of the professional hunter listed on your Namibian hunting permit [this name will appear on the face of the export permit].

Name: CUAN MEREDITH  
Business Name: TROPHY CONSULTANTS INTERNATIONAL  
Address: 4 JOSIAH CHINAMANO ROAD  
City: BELMONT, BULAWAYO  
State/Province:  
Country, Postal Code: ZIMBABWE  
AFRICA

9. For species listed under the Endangered Species Act, please be aware that the U.S. Fish and Wildlife Service must make a finding that your activities will enhance or benefit wild populations of the species involved. While we will communicate with the range country for the species you will hunt or hunted when making the required findings, if you have any information that could support this finding, it would be helpful to our review if you could provide it. Please submit such information on a separate page with your application.

- a. Do you have any information regarding the population status or trend data on the species hunted?

SEE ATTACHED & Previous information provided by Conservation Force & Bulye Valley Conservatory.

- b. In order to hunt, you likely paid for licenses or trophy fees. What were those fees and do you have any information on how those funds were used by either the landowner, community, or government?

DAY RATE & TROPHY FEE - \$ 87,000

- c. Do you have information on other funding activities that are being carried out, or were carried out, by the safari outfitter, professional hunter, concession holder, or land owner that provide a conservation benefit to the species being hunted/species hunted?

SEE ATTACHED & Pprevious Information provided by Conservation Force & Bulye Valley Conservatory.

\*NOTE PRIOR ENHANCEMENT FINDINGS FOR THIS OPERATOR PRT- 62562C, attached.

**CERTIFICATION STATEMENT** (original signature must be provided for either 10 or 11 below)

10. **If you are a broker or taxidermist applying on behalf of a U.S. hunter or foreign national,** provide documentation to show you have a **Power of Attorney** to act on your client's behalf and sign the following statement.

I acknowledge that the sport-hunted trophy/trophies to be imported has been/will be personally hunted by my client and is being imported only for my client's personal use (i.e., **not for sale, transfer, donation, or exchange that is reasonably likely to result in economic use, gain, or benefit**). I understand that my client may only import two leopard trophies and two elephant trophies within the same calendar year (if applicable). In addition, I have advised my client that raw ivory, once imported into the United States, cannot be re-exported.

**Taxidermist/Broker's signature:** \_\_\_\_\_ **Date:** \_\_\_\_\_

11. **If you are the hunter applying to import your own trophy,** please read and sign the following statement.

I acknowledge that the sport-hunted trophy/trophies to be imported has been/will be personally hunted by me and is being imported only for my personal use (i.e., **not for sale, transfer, donation, or exchange that is reasonably likely to result in economic use, gain, or benefit**). I understand that I may only import two leopard trophies and two elephant trophies within the same calendar year. In addition, I understand that raw ivory, once imported into the United States, cannot be re-exported.

**Applicant's signature:** \_\_\_\_\_ **Date:** 3/17/2020

*Be aware that there may be additional permitting or approval requirements by your local or state governments, as well as required by other Federal agencies or foreign government to conduct your propose activity. While the Service will attempt to assist where possible, it is your responsibility to obtain such approval.*

**All international shipment(s) must be imported through a designated port. A list of designated ports (where an inspector is posted) is available from <http://www.fws.gov/le/designated-ports.html>. If you wish to use a port not listed, please contact the Office of Law Enforcement for a Designated Port Exemption Permit (form 3-200-2).**

DALLAS / FT. WORTH, TEXAS

## **NOTICE OF REPRESENTATION**

This is a notice to the U.S. Fish and Wildlife Service that I have named, constituted and appointed John J. Jackson, III, Conservation Force, 3240 S. I-10 Service Rd. W., Suite 200, Metairie, Louisiana, 70001, telephone (504) 837-1233, FAX (504) 837-1145, jjw-no@att.net as my attorney and legal representative concerning my personal trophy import application/s.

This authority is all inclusive, including, but not limited to permit filing, permit supplementation, reconsideration, administrative appeal and request for time delays or extensions. The authority includes access to the entirety of all related records and administrative files and related correspondence with third persons and governments.

I also request that John J. Jackson, III be copied with all correspondence, acknowledgements, notices and decisions concerning my permit during its processing and during any and all steps in its administrative reconsideration or appeal.

(b) (6)

  
GARY GUERRIERI

3-17-2020

DATE



# United States Department of the Interior

## FISH AND WILDLIFE SERVICE

International Affairs

5275 Leesburg Pike, MS: IA

Falls Church, VA 22041-3803

### In Reply Refer To:

FWS/AIA/DMA/62562C

### Enhancement Finding

Applicant: Steven **Elbert** Chancellor (PRT - 62562C)

Steven **Elbert** Chancellor submitted an application on November 8, 2017, for the importation of one male lion (*Panthera leo melanochaita*) taken from Buby Valley Conservancy, Zimbabwe for the purpose of enhancing the propagation and survival of the species in the wild. After evaluating the available information submitted with the application, information provided by the Government of Zimbabwe, other information available to the U.S. Fish & Wildlife Service (Service), and comments received from interested parties, the Service has determined that the importation of the sport-hunted trophy taken July 7, 2016, from this population meets the enhancement criteria under 50 CFR 17.32.

### Governance of the Lion in the United States:

On October 29, 2014, the Service published in the Federal Register a finding that listing the African lion subspecies (*Panthera leo leo*) as a threatened species under the Endangered Species Act (Act or ESA) was warranted and proposed a rule under Section 4(d) of the Act to provide conservation measures for the African lion. (79 Fed. Reg. 64472). On December 23, 2015, after fully considering the comments from the public and the peer reviewers on the proposed rule, the Service published in the Federal Register the final rule in which the taxonomic classification of the Asiatic lion (previously classified as *P. l. persica* and listed as an endangered species under the Act) was changed to *P. l. leo* (Asia and western, central and northern Africa) and listed as an endangered species, and the *P. l. melanochaita* (southern and eastern Africa) subspecies was listed as a threatened species with a rule under Section 4(d) of the Act, which is set forth at 50 CFR 17.40(r) (USFWS 2015; 80 Fed. Reg. 79999). The effective date of this listing is January 22, 2016. Therefore, as of January 22, 2016, the lion subspecies *Panthera leo melanochaita*, whose range includes Zimbabwe, is listed as threatened under the Act and is regulated under an ESA Section 4(d) special rule [50 CFR 17.40(r)].

Section 9 of the Act and our implementing regulations at 50 CFR 17.21 and 50 CFR 17.31 set forth a series of general prohibitions that apply to all endangered and threatened wildlife, respectively, except where a 4(d) rule applies to threatened wildlife, in which case the 4(d) rule contains all the applicable prohibitions and exceptions. Under the 4(d) rule for *P. l. melanochaita*, all of the prohibitions under 50 CFR 17.31 apply to *P. l. melanochaita* specimens. These prohibitions, at 50 CFR 17.21 and 17.31, in part, make it illegal for any person subject to the jurisdiction of the United States to "take" (includes harass, harm, pursue, hunt, shoot, wound, kill, trap, capture, or to attempt

any of these) within the United States or upon the high seas; import or export; deliver, receive, carry, transport, or ship in interstate or foreign commerce, by any means whatsoever, in the course of commercial activity; or sell or offer for sale in interstate or foreign commerce any lion specimens. It also is illegal to possess, sell, deliver, carry, transport, or ship any such wildlife that has been taken in violation of the Act. Permits may be issued to carry out otherwise prohibited activities involving endangered and threatened wildlife species under certain circumstances. Regulations governing permits for endangered species, such as *P. l. leo*, are codified at 50 CFR 17.22. Regulations governing permits for threatened species, such as *P. l. melanochaita*, are codified at 50 CFR 17.32.

In sum, under paragraph 50 CFR 17.40(r)(1), all the prohibitions and exceptions under 50 CFR 17.31 and 50 CFR 17.32 apply to *P. l. melanochaita*. Accordingly, the Service may authorize the import of a sport-hunted lion trophy from Zimbabwe, but only if it first makes a finding that permitting the import of a trophy would enhance the survival of the species in the wild.

As we explained when finalizing the 4(d) rule for *P. l. melanochaita*, any person wishing to conduct an otherwise prohibited activity, including all imports of *P. l. melanochaita* specimens, must first obtain a permit under 50 CFR 17.32. As with all permit applications submitted under 50 CFR 17.32, the individual requesting authorization to import a sport-hunted trophy of *P. l. melanochaita* bears the burden of providing information in their application showing that the activity meets the requirements for issuance criteria under 50 CFR 17.32. In some cases, such as for import of sport-hunted trophies, it is not always possible for the applicant to provide all of the necessary information needed by the Service to make a positive determination under the Act to authorize the activity. In such cases, the Service may consult with the range country and other interested parties to the extent practicable to obtain necessary information. The Service will make the required findings on sport-hunted trophy imports of *P.l. melanochaita* on an individual application basis, however information obtained for the country as a whole will continue to be considered as it contains information pertinent to the Service's evaluation. Any new information obtained or submitted to the Service will be evaluated and considered in all future findings for sport-hunted trophies of *P.l. melanochaita* taken in Zimbabwe.

#### General considerations:

As we also explained when finalizing the 4(d) rule, our threatened species permitting regulations at 50 CFR 17.32 provide issuance criteria for threatened species permits [50 CFR 17.32(a)(2)] , but do not specify what would constitute the enhancement of propagation or survival with regard to authorizing the import of parts or products of *P. l. melanochaita*, including sport-hunted trophies. Therefore, when making a determination of whether an otherwise prohibited activity enhances the propagation or survival of *P. l. melanochaita*, the Service examines the overall conservation and management of the subspecies in the country where the specimen originated and whether that management of the subspecies addresses the threats to the subspecies (*i.e.*, that it is based on sound scientific principles and that the management program is actively addressing the current and longer term threats to the subspecies). In this review, we evaluate whether the import contributes to the overall conservation of the species by considering whether the biological, social, and economic aspects of a program from which the specimen was obtained provides a net benefit to the subspecies and its ecosystem.

The Service has evaluated Mr. Chancellor's application involving a *P. l. melanochaita* sport-hunted trophy taken in Zimbabwe, in the context of enhancement of propagation or survival in accordance with our threatened species permitting regulations at 50 CFR 17.32 and issuance criteria for threatened species permits [50 CFR 17.32(a)(2)]. These include, in addition to the general permitting criteria in 50 CFR 13.21(b):

- (i) Whether the purpose for which the permit is required is adequate to justify removing from the wild or otherwise changing the status of the wildlife sought to be covered by the permit;
- (ii) The probable direct and indirect effect that issuing the permit would have on the wild populations of the wildlife sought to be covered by the permit;
- (iii) Whether the permit, if issued, would in any way, directly or indirectly, conflict with any known program intended to enhance the survival probabilities of the population from which the wildlife sought to be covered by the permit was or would be removed;
- (iv) Whether the purpose for which the permit is required would be likely to reduce the threat of extinction facing the species of wildlife sought to be covered by the permit;
- (v) The opinions or views of scientists or other persons or organizations having expertise concerning the wildlife or other matters germane to the application; and
- (vi) Whether the expertise, facilities, or other resources available to the applicant appear adequate to successfully accomplish the objectives stated in the application.

In addition to these factors, particularly in relation to sport hunting, we find the *IUCN Species Survival Commission (SSC) Guiding Principles on Trophy Hunting as a Tool for Creating Conservation Incentives, Ver. 1.0* (IUCN SSC 2012), to provide useful principles, which, considered in conjunction with our threatened species issuance criteria, will aid the Service when making an enhancement finding for importation of sport-hunted trophies of *P. l. melanochaita*. This document sets out guidance from experts in the field on the use of trophy hunting as a tool for "creating incentives for the conservation of species and their habitats and for the equitable sharing of the benefits of use of natural resources" (IUCN SSC 2012, p. 2) and recognizes that recreational hunting, particularly trophy hunting, can contribute to biodiversity conservation and more specifically, the conservation of the hunted species.

The SSC document lays out five guiding principles that, considered in conjunction with our threatened species issuance criteria, will aid the Service when making an enhancement finding for importation of sport-hunted trophies of *P. l. melanochaita*:

- (a) *Biological sustainability*: The hunting program cannot contribute to the long-term decline of the hunted species. It should not alter natural selection and ecological function of the hunted species or any other species that share the habitat. The program should not inadvertently facilitate poaching or illegal trade in wildlife by acting as a cover for such illegal activities. The hunting program should also not manipulate the ecosystem or its component elements in a way that alters the native biodiversity.

**(b) Net Conservation Benefit:** The biologically sustainable hunting program should be based on laws, regulations, and scientifically based quotas, established with local input, that are transparent and periodically reviewed. The program should produce income, employment, and other benefits to create incentives for reducing the pressure on the target species. The program should create benefits for local residents to co-exist with the target species and other species. It is also imperative that the program is part of a legally recognized governance system that supports conservation.

**(c) Socio-Economic-Cultural Benefit:** A well-managed hunting program can serve as a conservation tool when it respects the local cultural values and practices. It should be accepted by most members of the community, involving and benefiting local residents in an equitable manner. The program should also adopt business practices that promote long-term economic sustainability.

**(d) Adaptive Management: Planning, Monitoring, and Reporting:** Hunting can enhance the species when it is based on appropriate resource assessments and monitoring (e.g., population counts, trend data), upon which specific science-based quotas and hunting programs can be established. Resource assessments should be objective, well documented, and use the best science available. Adaptive management of quotas and programs based on the results of resource assessments and monitoring is essential. The program should monitor hunting activities to ensure that quotas and sex/age restrictions of harvested animals are met. The program should also generate reliable documentation of its biological sustainability and conservation benefits.

**(e) Accountable and Effective Governance:** A biologically sustainable trophy-hunting program should be subject to a governance structure that clearly allocates management responsibilities. The program should account for revenues in a transparent manner and distribute net revenues to conservation and community beneficiaries according to properly agreed decisions. All necessary steps to eliminate corruption should be taken and to ensure compliance with all relevant national and international requirements and regulations by relevant bodies such as administrators, regulators and hunters.

This approach to enhancement findings for the importation of sport-hunted trophies of *P. l. melanochaita* is consistent with the purpose and intent of the Act. As such, before the Service will authorize the importation of a sport-hunted trophy, we must determine that the trophy-hunting program is managed to ensure the long-term survival of the species. As part of this evaluation, we recognize that in many parts of the world, wildlife exists outside of protected areas and must share the same habitat and compete with humans living in these areas for space and resources. As identified in the *IUCN SSC Guiding Principle on Trophy Hunting as a Tool for Creating Conservation Incentives*, if communities that share these resources with wildlife do not perceive any benefits from the presence of wildlife, they may be less willing to tolerate the wildlife. However, under certain circumstances, trophy hunting can address this problem by making wildlife more valuable to the local communities and encourage community support for managing and conserving the hunted species, as well as other species.

In evaluating whether the importation of Mr. Chancellor's trophy of *P. l. melanochaita* would be authorized pursuant to 50 CFR 17.32, in accordance with our threatened species issuance criteria, we examined how Zimbabwe's management program for lions addresses the three main threats

that have led to the decline of the subspecies: habitat loss, loss of prey base, and human-lion conflict. When examining a management program and whether trophies taken as part of that program meet the issuance criteria, we study a number of factors. Some of the factors we consider include whether the program is based on sound scientific information and identifies mechanisms that would arrest the loss of habitat or increase available habitat (*i.e.*, by establishing protected areas and ensuring adequate protection from human encroachment). We consider whether the management program actively addresses the loss of the lion's prey base by addressing poaching or unsustainable offtake within the country. A component of a management plan from which trophy imports would meet the issuance criteria would be whether there are government incentives in place that encourage habitat protection by private landowners and communities and incentives to local communities to reduce the incursion of livestock into protected areas or to actively manage livestock to reduce conflicts with lions. We examine if the hunting component of the management program supports all of these efforts by looking at whether hunting concessions/tracts are managed to ensure the long-term survival of the lion, its prey base, and habitat. Hunting, if properly conducted and well managed, can generate significant economic benefits that may contribute to the conservation of lions. In looking at whether we are able to authorize the import of a trophy under the issuance criteria of 50 CFR 17.32 (a)(2), we will examine if the trophy hunting provides financial assistance to the wildlife department to carry out elements of the management program and if there is a compensation scheme or other incentives to benefit local communities that may be impacted by lion predation. We will also consider how a U.S. hunter, in this case Mr. Chancellor's participation in the hunting program contributes to the overall management of lions within a country.

The management program in Zimbabwe for *P. l. melanochaita* is expected to address, but is not limited to, evaluating population levels and trends; the biological needs of the species; quotas; management practices; legal protection; local community involvement; and use of hunting fees for conservation. In evaluating these factors, we work closely with the range countries and interested parties to obtain the information. By allowing entry into the United States of *P. l. melanochaita* trophies from range countries that have science-based management programs, we anticipate that other range countries would be encouraged to adopt and financially support the sustainable management of lions that benefits both the species and local communities. In addition to addressing the biological needs of the subspecies, a scientifically based management program will provide economic incentives for local communities to protect and expand *P. l. melanochaita* habitat.

#### Basis for Finding:

On February 1, 2016, the Service sent a letter to the Parks and Wildlife Management Authority in Zimbabwe (ZPWMA) with a list of questions related to management plans, population status, conservation, management, hunting policies, and regulations of Zimbabwe's lion populations. Additionally, in the letter the Service referenced the *IUCN Species Survival Commission (SSC) Guiding Principles on Trophy Hunting as a Tool for Creating Conservation Incentives, Ver. 1.0* (IUCN SSC 2012), as it provides useful principles which, when considered in conjunction with the Service's permit issuance criteria, would aid when making the required enhancement finding for permitting importation of sport-hunted lion trophies.

On February 16, 2016, the Service sent a second request to ZPWMA for specific documents related to the conservation status of lions in Zimbabwe. ZPWMA responded to the Service's request on February 17, 2016, with a copy of *Conservation Status of African Lion in Zimbabwe*, and subsequently, on November 29, 2016, provided a copy of *Enhancement and Non-detriment Finding for Lion (Panthera leo) in Zimbabwe*. The Service has also been corresponding with ZPWMA regarding African elephant management for several years. In this correspondence, ZPWMA, as well as other sources, have provided the Service with documents and information that are relevant to our evaluation of lions in Zimbabwe. These documents, along with the Service's own final rule on the lion listing under the Act, as well as other relevant information from reliable sources and contained in comments received from interested parties, were the basis of this finding.

**Governance of Lions in Zimbabwe:** The legal framework for Zimbabwe's regulatory mechanism is informed by the Wildlife Policy (1992), which is intended to maintain a protected area network for the conservation of the nation's wild resources and biological diversity. The Wildlife Policy (1992) provides for the Government of Zimbabwe to maintain a network of protected areas known as the Parks and Wild Life Estate, comprised of the country's National Parks, safari areas, botanical gardens, and sanctuary and recreational areas, for the conservation of the nation's wild resources and biological diversity (CITES 2016; ZPWMA 2016). It is intended to create economic activity to enhance rural development and encourages the conservation of wild animals and their habitats outside the protected areas.

ZPWMA was established by the Parks and Wildlife Act of 1996 (Chapter 20:14) [as amended by Act Number 19 of 2001] which came into operation on June 1, 2002, through Statutory Instrument 144C of 2002. The Act provides for the establishment of a Parks and Wildlife Board; establishment of national parks, botanical reserves, botanical gardens, sanctuaries, safari areas and recreational parks; and the preservation, conservation, propagation or control of wildlife, fish, and plants of Zimbabwe and the protection of her natural landscape and scenery. The Parks and Wild Life Act includes sections on virtually every aspect of ZPWMA, including requirements for annual financial audits and reporting to the central government. The Parks and Wild Life Act also provides for substantial penalties for the unlawful possession of or trading in protected wildlife species. In addition, the General Laws Amendment Act (No. 5) of 2010 provides for mandatory imprisonment for poaching.

The Parks and Wildlife Act, Chapter 20:14, devolved authority to manage and benefit from wildlife on communal and private lands to the landholders. In 1982, the legal provisions of this Act were extended to Rural District Councils (RDCs), on behalf of rural communities in communal lands whose areas contain viable populations of wildlife. Communal areas in Zimbabwe are administered by RDCs, which have become a mechanism for implementation of the government's policy of conservation by utilization of natural resources. It enables local communities to manage and benefit from wildlife resources through the Communal Areas Management Programme for Indigenous Resources (CAMPFIRE) established in 1989. CAMPFIRE was developed to encourage reduction in human-wildlife conflicts through conservation-based community development and to provide an economic incentive to improve community tolerance of wildlife, including lions. At the time, the CAMPFIRE program was the model for community-based conservation efforts in several other African countries and was identified as an innovative program. Under a community-based conservation program, like CAMPFIRE, rural communities should benefit from revenue generated by sport-hunting.

As Zimbabwe's premiere wildlife agency, the main functions of the ZPWMA are to control, manage and maintain Zimbabwe's wildlife resources and perform the service function with the primary role of protecting and conserving Zimbabwe's natural heritage for present and future generations on behalf of the State. It also provides the cornerstone of Zimbabwe's tourism industry (ZPWMA 2015). The rationale behind the establishment of the ZPWMA was to allow for a self-funding mechanism, and thereby reduce its dependence on the national treasury. In January 1996, the Government of Zimbabwe approved the establishment of the Parks and Wild Life Conservation Fund that provides for financing wildlife operations directly from revenues generated through wildlife-related activities. The funding for ZPWMA is therefore coming from revenue generated through sport hunting conducted on state and private lands, concession leases, National Park visitor fees, and other wildlife-related fees. While there have been requests by ZPWMA for funding from the central treasury in the past, to our knowledge, no other significant government funding has been provided, and only limited outside funding from NGOs or other governments appears to be available.

A major component of ZPWMA mandate is law enforcement. ZPWMA had 2,146 rangers at its establishment in 2002 (ZPWMA 2016); however, by the end 2015, there were 1,448 rangers in post (67% of 2002 level). Of the 1,448 rangers in post, 1,004 are deployable for anti-poaching operations (ZPWMA 2016). Hunting operators are obligated through their concession lease agreements to assist with anti-poaching efforts (ZPWMA 2016). Reportedly, USD590,000 was spent on anti-poaching efforts by Buvuma Valley Conservancy (BVC) alone during 2015 (K. Leatham, pers. comm., as cited in Du Preez et al. 2016), and USD546,000 is spent annually on anti-poaching by Save Valley Conservancy (SVC) (Lindsey et al. 2012); these expenses are mainly covered by sport-hunting revenue (Du Preez et al. 2016). If anyone is found in possession of poached specimens, they must pay a fine of USD5,000 or face a mandatory jail sentence. If convicted of lion poaching, courts could require the payment of a compensation fee of USD20,000 (ZPWMA 2014). Poaching mainly occurs along the boundaries of the protected areas where lions are incidentally snared as non-target prey. Between 2013 and 2015, 21 lions were killed illegally, with six animals killed through snaring in the area adjacent to Hwange National Park in 2015; poverty stands as the major driver of illegal hunting (ZPWMA 2016).

Zimbabwe is a member of the Southern African Development Community (SADC). Under the SADC Treaty, Article 5(g) establishes objectives to, among other aspects, promote the sustainable use of wildlife, harmonization of legal instruments governing wildlife use and conservation, promote the conservation of shared wildlife resources through the establishment of trans-frontier conservation areas (TFCA), and facilitate community-based natural resources management practices. To implement the SADC Treaty, member states are required to establish management programs for the conservation and sustainable use of wildlife. According to the ZPWMA *Enhancement and Non-Detrimental Findings for Panthera leo in Zimbabwe*, Zimbabwe has two established TFCAs, the Great Limpopo Trans-frontier Park (GLTP), which includes Gonarezhou National Park, and the Limpopo/Shashe TFCA. Additionally, there are other TFCAs that are in various stages of development, including Lower Zambezi-Mana Pools, Zimbabwe-Mozambique-Zambia (ZiMoZa), Chimanimani, and the Kavango-Zambezi (KAZA) trans-frontier conservation area (TFCA) initiative, which links 52 million hectares of conservation areas between itself, Botswana, Zambia, Namibia, and Angola (ZPMWA 2016; Masterson 2016). Through TFCAs, wildlife management entities are linking many of the major protected areas by removing boundary fences along national borders that separate many reserves in addition to creating or improving corridors to link good-quality habitat for wildlife (Newmark 2008). The principle of ecological and

migratory connectivity lies at the heart of the TFCA initiative linking large protected areas across international boundaries and providing space for wildlife populations.

In addition to Zimbabwe's domestic laws, it is also a Party to CITES. The lion is listed in Appendix II of the Convention. As an Appendix-II species, certain criteria must be met before such species can be exported, including a finding from the exporting country's CITES Scientific Authority that the proposed activity will not be detrimental to the survival of the species in the wild. In their reply to our inquiry, Zimbabwe provided a copy of their CITES non-detriment finding for lions. Their finding applied to all lion exports from Zimbabwe.

***Current Lion Status in Zimbabwe:*** When the Service listed the lion in southern and eastern Africa as threatened under the Act, three primary threats to the species throughout its range were identified: loss of habitat, loss of prey base, and human-lion conflict. While human population growth clearly has an impact due to loss of available habitat for lions, increasing human population has a direct impact on prey base. Prey availability affects the reproduction, recruitment, and foraging behavior of lions and, as a result, strongly influences lion movements, abundance, and population viability (Winterbach *et al.* 2012, as cited in USFWS 2015). Lion densities are directly dependent on prey biomass (Hayward *et al.* 2007). Outside of protected areas, the lion's prey base is much reduced (Du Preez *et al.* 2016); inadequate management and law enforcement has led to poaching of the lion's prey base in Africa for bushmeat, which has been critically depleted (USFWS 2015). Population trends across eastern and southern Africa show that most prey species have declined in recent years, and for Zimbabwe, droughts have been a critical factor (ZPWMA 2016). A reduced prey base results in a relatively greater chance of lions encountering livestock (Du Preez *et al.* 2016). While actual losses of livestock to predators may be relatively low, the perceived financial cost to farmers can be high, and lions are persecuted intensely in livestock areas as a consequence. Their scavenging behavior makes them particularly vulnerable to the practice of lacing prey carcasses with poison to eliminate predators (CITES 2016). Co-existence of lions and people is promoted through giving value to lions, through tourism and hunting in CAMPFIRE areas (ZPWMA 2014). The threat to lions from habitat loss is especially present in Sebungwe and the South East Low Veld where the fragmented nature of the protected areas is compounded by increasing human and livestock populations surrounding these areas (ZPWMA 2016).

According to the Service's CoP17 *Consideration of Proposals for Amendment of Appendices I and II*, international trade in lion products is emerging as an additional threat; however, the relative extent to which this threat has contributed to lion population declines is difficult to evaluate accurately (CITES 2016). According to ZPWMA (2016), the illegal local and international trade in lions and their products poses an insignificant risk to the species in Zimbabwe, as there are no records of people found in possession of illegally acquired lion specimens in Zimbabwe. It is not clear what the level of legal trade, if any, occurs within Zimbabwe.

The bulk of Zimbabwe's wildlife occurs within the Parks Estate which includes 11 national parks, 16 safari areas, 16 recreational parks, 6 sanctuaries, 12 botanical reserves and 3 botanical gardens, all spread across the country (Parks and Wildlife Act 2001 Chapter 20:14). Wildlife populations also occur on the state Forest Areas, Communal CAMPFIRE areas and private conservancies dedicated to wildlife-based land use. According to ZPWMA (ZPWMA 2016), there are approximately 319,317 km<sup>2</sup> of land where some form of wildlife based land use is practiced in Zimbabwe. Lions occur permanently in 45% of this available range (c. 145,00km<sup>2</sup>), with the

majority occurring in national parks (96%) and safari areas (92%). Lions also occur permanently in 47% of the State forest areas and 66% of privately owned conservancies. The CAMPFIRE areas comprise approximately 247,000km<sup>2</sup> and lions occur in 36% of these areas. Lions are transient in CAMPFIRE, conservancy and resettled areas adjacent to the major protected areas, and move across the border into Zambia, Mozambique, South Africa, and Botswana.

Zimbabwe's main lion range includes the Hwange-Matetsi Ecosystem, Mid Zambezi Valley, Sebungwe, and South East Lowveld. The lion population estimates in Zimbabwe are determined primarily through carnivore spoor surveys, systematic lion collaring, and call-up surveys. According to ZPWMA's *Conservation Status of the African lion (Panthera leo) in Zimbabwe* July 2014 report, starting in 2015, lion spoor surveys will be done at two-year intervals in all wildlife areas, and lion call-up surveys will be done every three years in all major lion areas (ZPWMA 2014). The Service has not received confirmation that these surveys have been conducted since 2015. ✓

ZPWMA (ZPWMA 2016) has estimated that the minimum number of lions that occur on approximately 51,642km<sup>2</sup> of land where reliable survey data are available is approximately 1,900 (range 1,800 – 2,000). The western portion of the country, consisting primarily of Hwange National Park and the surrounding safari areas, forest areas, communal areas and private conservancies, supports approximately 737 lions (or 38% of the overall population). The southern portion of the country, dominated by the two major conservancies (Save and Bulyana) and Gonarezhou National Park supports approximately 896 lions (48%). These numbers are supported by several studies. Groom et al. 2014, used call-up surveys to obtain direct estimates of the lion population within Gonarezhou National Park and compared actual lion densities with potential density estimates. In this study, while lions were only seen at five percent of calling stations, this equated to a population estimate of 33 lions, which is consistent with spoor survey results conducted in June 2010 (Groom et al. 2014). A 2015 spoor count survey of Gonarezhou National Park revealed an estimated 125 lions within the park (ZPWMA 2016). From 2007 to present, annual track index surveys at the SVC have been conducted using a standardized methodology (Groom and Watermeyer 2015, as cited in Du Preez et al. 2016). Prey availability models suggest that the carrying capacity for this lion population is approximately 271 lions (Hayward et al. 2007). In 2015, the estimated population was 284 lions (Du Preez et al. 2016). The Rifa Safari Area was surveyed using camera trapping and spoor counts in 2015, which supported an estimated population of 68 lions. The central and northern portions of the country reportedly support an estimated population of 284 lions (15%). The 12-year (2000-2011) average lion density per 100km<sup>2</sup> is 2.8 in Hwange National Park, 6.0 for South Eastern Lowveld in the SVC, 9.0 in Malilangwe, and 0.8 in Gonarezhou National Park (ZPWMA Annual Report 2013, as cited in ZPWMA 2014).

To manage any population to ensure an appropriate population level and determine whether sport hunting is having a positive effect, it is vital to have sufficient data on population numbers and population trends on which to base management decisions. According to Riggio et al. 2013 (p.32), and Bjorklund in Riggio et al 2013 (p.32), the minimum number estimated to constitute a viable population is 500 individuals. Hwange National Park, with an estimated population of 559, is the only area within Zimbabwe that has a viable population as laid out by Riggio et al. 2013. However, the two regions that make up the largest percentage of the country's lion population (Western 38% and Southern 48%) have regional populations of 737 and 896, respectively. The areas within the Central and Northern regions of Zimbabwe, albeit smaller, encompass parks that are part of Transfrontier Conservation Areas, such as the Mana Pools region. ✓

**Lion Management in Zimbabwe:** In response to discussions surrounding a possible up-listing of lion to Appendix I under CITES at the 13<sup>th</sup> Meeting of the Conference of the Parties (CoP13), and subsequent workshops involving lion range states, IUCN, ZPWMA, and other key stakeholders held a workshop to develop the *Conservation Strategy and Action Plan for the Lion (Panthera leo) in Zimbabwe* which was published by ZPWMA in 2006. The plan responds to regional and international standards set by Treaties such as CITES and the Convention on Biological Diversity (CBD), among others. The plan states, "it will guide the conservation and management of this top predator" which "addresses the needs of th[e] country." The Service is not aware of any additional or updated iterations of the plan since 2006; however, in their 2016 response, *Enhancement and Non-Detrimental Findings for Panthera leo in Zimbabwe*, ZPWMA provides updates on each of the outputs and respective targets established under the 2006 *Conservation Strategy and Action Plan for the Lion (Panthera leo) in Zimbabwe* (ZPWMA 2016).

The 2006 plan identifies a vision that "...lions should be conserved and managed sustainably for their aesthetic, cultural, and ecological values, and the socio-economic development of Zimbabwe." The plan lays out three broad targets to achieve this objective:

- Ensure the persistence of key lion populations and other important populations including those of doubtful viability.
- Human and livestock loss reduced.
- Optimize wildlife conservation-related net benefits to local communities.

All three targets are stepped down to seven specific outputs with their own targets and activities to meet such targets. Although the plan does not identify a time period, some activities do, of which a period of 5 years is the most common. In response to inquiries from the Service, ZPWMA provided a summary of the progress made to implement the 2006 strategy.

While all three of the broad targets appear to serve a valuable role in lion management in Zimbabwe, three of the specific outputs are most relevant to determining if the implementation of the strategy enhances the propagation or survival of the species, as required by the Act for the issuance of import permits. The first output, "lion populations, their habitats and wild prey effectively conserved and managed in collaboration with local stakeholders" has been broken down into a number of targets: establish a baseline survey and monitoring program; maintain and strengthen capacity for lion conservation, management, monitoring and research; identify and implement best management standards and practices for the hunting program; develop and implement co-management frameworks; and expand the geographic distribution range of lions. According to ZPWMA (2016), baseline surveys have been completed for the Parks Estate using monitoring protocols for key variables (populations, habitats, prey), and selected surveys have been undertaken in areas outside National Parks. Active carnivore research programs conducted by NGOs and research institutions, such as WildCRU, are taking place in various parts of the country; in addition, personnel have been trained in data collection and capture, management, lion aging and analysis. Adaptive age-based criteria for male trophy animals are in place and functioning. The quota for a certain year is determined by a point system based off the hunts from the previous season. Therefore, ZPWMA is actively working toward meeting the target areas for this output.

The second output, “human-lion related conflicts minimized and, where possible, eliminated” has also been broken down into a number of targets: develop and establish databases on lion-human conflicts; identify and implement methods to reduce and mitigate livestock losses and lion attacks on humans; and train and properly staff problem animal control (PAC) units to conduct rapid response and precisely target problem animals. According to information from ZPWMA (2016), approaches to mitigate livestock losses and lion attacks on humans are in the process of being tested and implemented in Hwange, and methods to mitigate lion attacks on livestock are being implemented as appropriate at selected sites (e.g. Tsholotshe). Data on PAC reports for lion-related problems have been collated, and PAC units at ZPWMA field station and/or RDC levels have been partially established. In Matusadona, Hwange, and Gonarezhou regions, specific awareness and education packages on lion conservation and management have been developed and implemented. The information submitted in the ZPWMA update suggests that they have met one target, and are in the process of implementing the remaining two.

The third output, “the costs and benefits of long-term lion management equitably distributed,” is a socio-economic output to establish agreement and implementation of area-specific lion management plans with identified stakeholders in each wildlife region, and implementing a transparent mechanism to equitably distribute lion-related income to identified stakeholders.” The specific targets for this output are: complete an inventory of stakeholders directly affected by lion conservation, deliver appropriate training and capacity building to prioritized stakeholders, agree to and implement collaboratively developed area-specific lion management plans with identified stakeholder groups in each wildlife region within 5 years, and implement transparent mechanisms to equitably distribute lion-related/generated income to identified stakeholders (groups and/or communities). Current information from ZPWMA shows that they have identified key stakeholders and assessed the financial impacts of lion conservation and the magnitude of socio-economic impacts on each stakeholder group. Limited training has been undertaken for representative stakeholders in Hwange, Matusadona, and Gonarezhou. ZPWMA has also implemented an adaptive management program across four wildlife regions and are in the progress of developing and implementing area-specific lion management plans with identified stakeholder groups. According to ZPWMA, a Management Plan for Hwange has been approved. However, the Service does not have a copy of this plan. With these updates, ZPWMA has made progress toward this output's targets. ✓

The strategy also identifies roles and responsibilities for a number of players in Zimbabwe's lion conservation efforts. According to the strategy, there is a national lion coordinator that is to coordinate all national activities on lion conservation, research, and management, including census surveys, setting up monitoring needs and coordinating data on human-lion conflicts. The strategy goes on to identify roles for the field stations, wardens, ecologists and utilization units, which are responsible for ensuring compliance with hunting regulations and maintaining safari hunting databases. In addition, the strategy identifies roles for CAMPFIRE, safari operators, and professional hunters to facilitate training and ensure compliance with hunting regulations.

*The Conservation Strategy and Action Plan for the Lion in Zimbabwe (ZPWMA 2006)* borrows language from the *IUCN SSC Conservation Strategy (2006)*. It iterates areas in need of improvement regarding lion conservation in Zimbabwe, including standardized lion census methods and surveys, further mitigating human-lion conflicts, and maximizing benefits for rural communities that live with lions. ZPWMA (2006) notes their intention to review and put in place criteria for age-based identification of male trophy animals, but do not mention if they will be

reviewing possible combination strategies. As part of the 2006 lion conservation strategy for eastern and southern Africa, six objectives were established to secure and restore sustainable lion populations, which were housed under the following categories: management, mitigation, socio-economics, policy and land-use, politics, and trade. The strategy was intended to be implemented within 10 years (Macdonald 2016), and Zimbabwe gave an update on progress regarding these objectives in their *Enhancement and Non-Detrimental Findings for Panthera leo in Zimbabwe* (ZPWMA 2016) that also addressed outputs and targets laid out in their 2006 action plan.

Additionally, to mitigate human-lion conflict, the “Long Shields Guardian Programme” was initiated whereby communities are notified of movements of collared lions into their areas via cell phone, and then have the opportunity to take appropriate action, such as moving cattle. In 2013 alone, 1,850 warnings were passed to the “Long Shields.” These actions may reduce the incidents of lions marauding livestock; however, retaliatory killing of lions still occur. Further, as is policy under The Parks and Wildlife Act of 2001, any lions that attack humans or livestock will be lethally eliminated (ZPWMA 2016). Between 2007 and 2013 a total of 1,113 conflict incidents were recorded in the Hwange area in which 915 head of stock were lost to lions.

**Hunting and Utilization:** Lions are infamously infanticidal (Schaller 1972, as cited in Du Preez et al. 2016), which is often used as an argument against sport-hunting of the species (e.g. Packer et al. 2011), where it is feared that the removal of dominant males causes cub mortality that eventually results in lowered population recruitment and survival (Packer et al. 2009). Infanticide, however, may be less of an issue in terms of sport-hunting if age-appropriate males, past their prime and no longer territorial or with dependent cubs, are harvested (Whitman et al. 2004).

The minimum number of lions that occur in approximately 51,642km<sup>2</sup> of land in Zimbabwe, where reliable survey data are available, is estimated to be 1,917 (range 1,800 – 2,000), the majority of which occur in western and southern Zimbabwe. When taking this population estimate into consideration, trophy hunting harvests a yearly mean of 2.7% of adult male lions. This figure has decreased since the establishment of age restrictions on lion hunting (ZPWMA 2016).

Trophy hunting of wildlife is legally permitted in safari areas, of which there are 16 in Zimbabwe (ZPWMA 2014). According to the Forest Act, Chapter 19:05, there are 24 gazetted indigenous forest areas in Zimbabwe; within these forest areas, lions may be hunted in the following forests: Fuller, Kazuma, Pandamasuwe, Ngamo, Sikumi, Gwayi, Sijarira, and Gwampa (ZPWMA 2014). In 2013, an adaptive quota management system for lion hunting based on the ages of lions hunted was agreed to in Harare, Zimbabwe, during a meeting hosted by ZPWMA and an independent non-governmental conservation organization (Du Preez et al. 2016). After reviewing aging techniques, attendees at the July 2013 meeting in Harare, Zimbabwe were confident that hunters could be expected to categorize lions as being below or above five years of age. In determining quotas for the following years, operators would be rewarded with increased quotas if they hunted animals of six years or older, would not be penalized if they hunted animals five years of age, but would have quotas cut if they hunted animals younger than five years old or if they failed to complete hunt returns (ZPWMA and Panthera 2014). In 2013, only 28% of lions hunted were five years old or older. In 2015, that figure rose to 77.3% (ZPWMA 2016). According to Hunter et al. (2013), an adaptive quota management system utilizing age-based criteria would not only aid in the prevention of over-harvesting lions, but would also prevent excessively conservative quotas. Further, according to Miller et al. (2016), results indicate that age-based hunting is feasible for sustainably managing threatened and economically significant species such as the lion, but must be guided by

rigorous training, strict monitoring of compliance and error, and conservative quotas. No single trait can be relied upon exclusively to precisely age lions. Rather, multiple traits must be examined in combination to cross-validate an individual's age and, according to Whitman et al. (2004), restricting hunting to individuals that are at least six years old is desirable from a biological perspective due to the reduced risk of the loss of pride males and infanticide of cubs associated with the harvest of such individuals (Whitman et al. 2004).

During 2013, operators were requested to submit hunt returns and photos as a trial run to get the adaptive quota system up and running. In 2014, operators were requested to do the same but were informed that the age of the lions hunted in 2014 would determine their lion quotas in 2015 (Du Preez et al. 2016). In 2015, there was a marked increase in the age of lions hunted in Zimbabwe as a whole. The majority of lions hunted were on the cusp of 5-6 years of age but were not older than six years. National hunting offtakes for lions in Zimbabwe from 2013 to 2015 were 29, 42, and 47 respectively (Masterson 2016). It appears these do not include illegal forms of hunting offtake.

Previously, Zimbabwe set quotas for the hunting of female lions. Between 1998 and 2004, Zimbabwe maintained a mean quota of  $0.3 \pm 0.1/100 \text{ km}^2$  for female lions; during the same period, actual offtake was lower at  $0.08 \pm 0.1/100 \text{ km}^2$ , or a mean of 30.6 percent of the quota actually harvested (Loveridge et al. 2007). However, females are the most productive portion of a population; if they are removed from a pride, there is inherent risk that dependent cubs will die and the overall breeding success of the pride will be reduced. Zimbabwe discontinued issuing quotas for female lions in 2011 (USFWS 2015). In 2011, Zimbabwe's quota was set at 101 lions; in 2014, it was reduced to 50 male lions following the implementation of age restrictions (Henschel 2015, pers. comm., as cited in USFWS 2015).

In setting adaptive lion quotas, Zimbabwe uses scientific information including spoor surveys, camera traps, and ranger-based sighting. In CAMPFIRE areas, incidences of human-lion conflict are also taken into consideration where survey information is not readily available, when determining quotas for those areas (ZPWMA 2014). The quota setting process involves all stakeholders, including the ZPWMA, landowners, safari operators, and CAMPFIRE managers and their representatives. During the annual quota-setting workshop, presentations are made by the proponents who then make proposals for quotas. Where it is felt that not enough information has been presented, however, a precautionary quota will still be issued (ZPWMA 2014). The Service is not aware of how precautionary quotas are treated after they are issued, or if there is a protocol for obtaining necessary information when a precautionary quota is put in place. ✓

ZPWMA (2016) mentions seven concessions that are leased on five year terms, and how these concessionaires pay a 5 year "right to lease" fee, annual rental, fixed quota fee (payable if animals are shot or not) and a supplementary quota fee that allows additional animals to be bought as needed. It is unclear to what extent Zimbabwe still utilizes fixed quotas, as Du Preez et al. claims fixed quotas are no longer being used by Zimbabwe, but a fixed quota fee is mentioned in ZPWMA (2016). It is also unclear how many animals concessionaires are able to "buy as needed," and how such requests may be accommodated without going over the national quota (ZPWMA 2016). ✓

Between 1999 and 2004, data were collected in and around Hwange National Park that suggested that hunting surrounding the park was having a negative impact on the lion population. Therefore, sport hunting of lions was suspended in the area surrounding the park between 2005 and 2009. Following the lifting of the moratorium, and by implementing stricter monitoring and hunting

guidelines through the Hwange Lion Research Project, the overall Hwange lion population has continued to show a positive trend, and is now estimated at over 550 animals (ZPWMA 2015).

CAMPFIRE is the program through which the Zimbabwean Government has developed the management of wildlife resources to communal farmers. As of July 2014, there are at least 58 Rural Districts that have been granted the Appropriate Authority status to manage wildlife resources in their areas; however, according to *Enhancement and Non-Detrimental Findings for Panthera leo in Zimbabwe* ZPWMA 2016, only 16 are actively engaged in some form of wildlife based land use (ZPWMA 2016). Lions are found in communal areas that are adjacent to major protected areas, and lion hunting is allowed in CAMPFIRE districts (ZPWMA 2014). According to EcoWeb (2015), all income generated by trophy hunting in CAMPFIRE areas was distributed to communities (52%, when they are typically prescribed 55%), rural district councils (RDCs) (44%, when they are typically prescribed 41%), and the CAMPFIRE association (4%). Communities, rather than dividing income by households, typically invest in projects that benefit the communities as a whole, such as schools, clinics, and grinding mills. Councils use funding for patrols, monitoring of hunts, problem animal control, water, and fire management, while the CAMPFIRE association uses their funding to cover administrative costs and representation of the program (EcoWeb 2015). As was agreed upon at the 2013 lion management meeting in Harare, the CAMPFIRE areas in which lions occur are currently exempted from the age restrictions. This approach was adopted as a means of ensuring that impoverished communities obtain the opportunity to benefit from the presence of lions, recognizing the potential negative impacts the species has on the livelihoods of livestock farmers (ZPWMA 2016). According to ZPWMA's 2016 response, between 2010 – 2015, lions accounted for 2% of the total income generated from hunts conducted on CAMPFIRE lands and trophy fees accounted for 74% of the total funds generated for CAMPFIRE. Further, U.S. hunters account for 51% of the funds generated from hunting in CAMPFIRE areas during the same period. While hunting is allowed in CAMPFIRE areas, it is unclear if American sport-hunters conduct lion hunts in these areas; if so, the Service is not aware if sport-hunters are exempted by the age restriction in this case, and how this exemption in CAMPFIRE areas is taken into consideration when setting quotas for other portions of the country.

According to the Revised CAMPFIRE Revenue Sharing Guidelines, which were incorporated into the Constitution of the CAMPFIRE Association in 2007, at least 55% of generated revenue from hunting should be devolved to producer communities, no more than 26%, and 15% for management and overhead at the RDC level, respectively, and 4% as a levy to the CAMPFIRE Association. According to an undated document (but presumably produced in late 2014, since it references data from 2014 but does not include any references to 2015 data) produced by CAMPFIRE (CAMPFIRE report undated) at least 10 RDCs comply with the Revenue Guidelines.

According to *The Role of Trophy Hunting of Elephant in Support of the Zimbabwe CAMPFIRE Program – December 2016*, a report the Service received on December 17, 2016, the Reserve Bank of Zimbabwe, in collaboration with relevant stakeholders, has established the Tourism Receipts Accounting System that required all outfitters to submit returns listing the revenue generated for hunting activities. This system has been in place for several years, but required manual analysis of the data to extract information on hunting revenue. In January 2015, to account fully for earnings in the hunting sector, the Reserve Bank of Zimbabwe, in collaboration with relevant stakeholders, introduced the Tourism Receipts Accounting System (TRAS2) a web-based system (TRAS2) that links Safari Operators, ZPWMA Authority, Taxidermists, Shipping Agents, International Marketing Agents, and Reserve Bank. Under this system, all authorized hunts are registered, allowing for the

capture of hunting data, such as the origin of clients, value of trophies and hunts, and area hunted, to monitor hunting quota utilization and track hunted trophies. According to the December 2016 report, the Exchange Control Division of the Reserve Bank of Zimbabwe and the ZPWMA are now able to:

1. Assess regional price differentials of similar hunts and the reasons thereof;
2. Present TRAS2 system updates and reports to the users, including international marketing agents;
3. Engage with international marketing agents of sport hunting;
4. Obtain relevant insights on governing of the hunting sector; and
5. Come up with an effective mechanism to fully account for export proceeds from the hunting sector.

The TRAS2 information was utilized in *Enhancement and Non-Detrimental Findings for Panthera leo in Zimbabwe* (ZPWMA 2016) to provide a breakdown of the source of hunting income, and the amount of funds generated by trophy fees by land category, among other insights, and has proven the TRAS2 system's ability to obtain relevant insights on governing of the hunting sector.

#### Evaluation:

As stated earlier, the Service will evaluate any application in accordance with our threatened species permitting regulations at 50 CFR 17.32 and issuance criteria for threatened species permits [50 CFR 17.32(a)(2)]. In evaluating each of these criteria based on information available to the Service, we have been able to determine that this impact of a sport-hunted lion trophy animal would qualify for the issuance of the required import permit.

17.32(a)(2)(i): Whether the purpose for which the permit is required is adequate to justify removing from the wild or otherwise changing the status of the wildlife sought to be covered by the permit:

Zimbabwe's lion hunting industry generated 9% of all sport hunting revenue in 2015; 51% was contributed by U.S. hunters during 2010-2015 country-wide, and 90% of the sport hunting market in BVC and SVC from 2005-2015. Even though 9% may not seem like much, lions are a key component of the sport hunting industry, as they are part of the "Big 5" trophies and draw U.S. hunters to Zimbabwe. Based on the information available to the Service, the participation of communities in CAMPFIRE has heralded a reversal in wildlife declines on private land. When the benefits of CAMPFIRE were extended to RDCs, it further aided in the equitable distribution of benefits from trophy hunting to locals, which incentivizes them to conserve the African lion. As mentioned in the case of SVC, without the hunting industry, these wildlife areas, which have become conservation havens in the threat of human encroachment across much of Zimbabwe, would not be economically viable, and therefore would not exist.

There was conflicting information presented to the Service on how many lions were included in the quota in 2015. Du Preez et al. (2016) reports a national lion hunting quota of 85 with 39 hunted; ZPWMA (2016) reports the national lion hunting quota in 2015 was 82 lions, with 49 hunted. When evaluating the lower quota with higher utilization reported by ZPWMA (2016), and taking into consideration the land area of the Parks Estate alone, Zimbabwe did not exceed the best management practice of 0.5 lions/1,000 km<sup>2</sup>; the 2015 offtake would have accounted for 0.125 lions/1,000 km<sup>2</sup>.

Zimbabwe also has taken into consideration other best management practices, including age-based criteria for an adaptive management strategy, and takes past performance of hunting organizations into consideration when determining future quotas.

Further, sport hunting was essential for the successful transition of the SVC from cattle to wildlife (Du Preez et al. 2016), in that it provided monetary benefits for the conservation of lions and local communities. The BVC donates over 45 tons of meat from sport hunting to the local communities each year. This meat donation is worth over USD100,000 per year. BVC also supports several schools, clinics, and community projects in the three surrounding districts of Mwenezi, Maranda, and Jopempe. The local community sees a direct benefit from the wildlife in BVC, but is also empowered by job opportunities created both with these community projects, as well as on BVC (du Preez et al. 2016).

While Zimbabwe's hunting industry generated approximately 8 million in 2015, not all of this is connected to lion hunting or to U.S. hunters. However, lions are a key component of the hunting industry since they are part of the "Big 5" trophies and draw U.S. hunters to Zimbabwe. Based on the information available to the Service, the funds generated by hunting trophies contribute to the ZPWMA's ability to manage the country's lion populations as well as the success of CAMPFIRE. It appears that without the hunting industry, it would not be economically viable to maintain lions. U.S. hunter participation in lion hunts, in and of itself, is not enough to make or break the industry. However, U.S. hunters have played a significant role in the industry in Zimbabwe, previously making up 51% of all hunting in Zimbabwe and 72% of lion hunts within the country. As such, the removal of their participation could have a long-term impact.

Further, the *Strategy and Action Plan* have put into place mechanisms to adequately oversee the harvest of lions in Zimbabwe. With an annual harvest of approximately 85 lions, Zimbabwe is not exceeding the limits identified of 0.5 lions/1,000 sq. km. The objectives of the *Strategy and Action Plan* and the actions and monitoring activities that have been put into place to achieve these objectives should support the adaptive management approach that Zimbabwe has established for managing lions. The Service will continue to monitor the effectiveness of the *Strategy and Action Plan*, for consideration in future findings.

Therefore, based on the information available to the Service and provided that the reserve where the lion was taken was properly permitted and in compliance with national and local regulations, the purpose for which a permit is being requested is adequate to justify removing the sport-hunted trophy lion from the wild or otherwise changing their status.

17.32(a)(2)(ii): The probable direct and indirect effect that issuing the permit would have on the wild populations of the wildlife sought to be covered by the permit:

The total area under wildlife-based land use and conservation in Zimbabwe amounts to 10.7 million hectares, and represents 27% of the total surface area of the country. Of this, 7.9 million hectares, or 75% of all conservation land in the country, falls under safari hunting as the primary or only source of revenue. With the CAMPFIRE program, private landholders and RDCs are given the opportunity to benefit from the wildlife on their land, including lion, and incentivize them to conserve the species. Sport hunting of lions by U.S. hunters supports the programs in Zimbabwe that provide the opportunity for locals to see value in lions, which in turn conserves the species in the long-term.

A scientifically based quota is the number of a given species that can be removed from a specific population without damaging the biological integrity and sustainability of that population (WWF 1997). However, full implementation and enforcement of the age-based strategy could potentially cause the need for quotas to become irrelevant or eliminated (USFWS 2015). Age restrictions will naturally restrict offtake to a limited number of individuals that meet the age criteria (Loveridge *et al.* 2007, Whitman *et al.* 2004).

Throughout the information provided to the Service, it is clear that Zimbabwe has made strides in their management of their lion populations. Although prior to 2011, Zimbabwe allowed the hunting of lionesses and males under 5 years old, they made significant changes to ensure their hunting program is sustainable. In 2011, Zimbabwe restricted the hunting of female lions. In 2013, they proposed an adaptive age-based setting for hunting quotas. In 2015, the development TRAS2 allowed the country to assess regional price differentials of similar hunts and the reasons thereof; present TRAS2 system updates and reports to the users, including international marketing agents; engage with international marketing agents of sport hunting; obtain relevant insights on governing of the hunting sector; and come up with an effective mechanism to fully account for export proceeds from the hunting sector. Further, Zimbabwe appears to be transparent in their management processes, including their quota setting.

According to CITES trade data and Service records, from 2011 to 2016, there were 223 lion trophies imported to the U.S. from Zimbabwe. Best practice would be to import only male lions, as pointed out by Macdonald (2016), but Zimbabwe has already taken the initiative by placing a moratorium on lioness hunting. The fixed-quota concept, in which hunting quotas had to be paid for upfront before the hunting season begins, and results in poor quality trophies and young animals being hunted, has also been abandoned (Du Preez *et al.* 2016). Zimbabwe appears to be transparent in their implementation of the age-based adaptive management strategy (USFWS 2015). The adaptive quota management system for lion hunting based on the ages of lions hunted has been accepted and embraced by all stakeholders. This adaptive quota management system has not only led to a reduced national lion hunting quota, but has also resulted in a significant increase in the age of harvested lions to a level that is considered to have a reduced ecological impact (Du Preez *et al.* 2016).

Between 2005 and 2015, the U.S. market has represented over 90% for the sport-hunting market in both the BVC and SVC. If this market was effectively lost due to an inability of prospective clients to import their trophies, it would become unviable to continue managing BVC as a wildlife area in its current form (Du Preez *et al.* 2016). Across all CAMPFIRE districts, from 2010 to 2015, there was a total quota of 140 lions, with actual offtake equaling 45 animals. During this same period, U.S. sport hunters apparently accounted for 51% of Zimbabwe's sport hunting clients; trophy fees represented 74% of CAMPFIRE income, of which lions play a small role. In 2015, lion sport hunting generated USD753,000 in revenue, which accounts for about 9% of all sport hunting revenue in Zimbabwe that year (ZPWMA 2016).

Evaluating the information provided by the Zimbabwe government and other sources, it appears that the hunting program in Zimbabwe is addressing the three main threats that were identified by the Service when making the determination that the species was threatened with the possibility of extinction. The hunting areas are maintaining habitat for lions and ensuring that there is no further loss, provided that the hunting areas can remain economically viable. In order to maintain a viable

population of lions, the parks, safari, and CAMPFIRE areas must maintain biodiversity and a sustainable prey base. Finally, Zimbabwe is actively working to reduce human-lion conflicts and the number of lions killed in retaliation for killing livestock. Therefore, the management of lions within Zimbabwe and the limited hunting of lions contributes to the on-going survival of the species in Zimbabwe.

Provided that the off-take of lions continues to be monitored and the actions identified in the Strategy and Action Plan continues to be implemented, the participation of U.S. hunters in lion hunts would provide an indirect benefit to wild populations by helping to support the reserves where lions are found. Therefore, based on the information available to the Service, the probable direct and indirect effect that issuing an import permit for a legally hunted lion would have on the species would be positive.

17.32(a)(2)(iii): Whether the permit, if issued, would in any way, directly or indirectly, conflict with any known program intended to enhance the survival probabilities of the population from which the wildlife sought to be covered by the permit was or would be removed:

As stated above, Zimbabwe is monitoring and controlling the harvest of lions through permitting under their regulations and through the Strategy and Action Plan. The issuance of import permits for lions legally hunted under these authorities would not conflict with any programs intended to enhance the survival probability of the species in Zimbabwe. If import permits for sport hunted lion trophies from Zimbabwe were to be issued, it would work in favor of, not against, the principal acts governing lion conservation in Zimbabwe. Furthermore, sport hunting opportunities for hunters in CAMPFIRE districts would help local communities realize the value in conserving the African lion.

Therefore, based on the information available to the Service, the issuance of an import permit for a legally hunted lion does not conflict with known conservation programs and rules.

17.32(a)(2)(iv): Whether the purpose for which the permit is required would be likely to reduce the threat of extinction facing the species of wildlife sought to be covered by the permit:

With limited, controlled off-take of lions in a manner that would maintain sustainability, the legal hunting activities that U.S. hunters would be involved in would contribute to reducing the threat of extinction of lions. This off-take must be monitored to ensure that it is sustainable and that, to the extent possible, normal lion behavior and ecology are not negatively impacted. It appears that the permitting activities under Zimbabwe's laws and CITES, as well as the implementation of the adaptive age-based lion quota, and a continuation of implementation of the outputs in the *Strategy and Action Plan* will ensure the long-term survival of lions. The utilization of hunters to manage the populations on the reserves is an important element of the success of lion management in Zimbabwe.

Therefore, based on the information available to the Service, the issuance of an import permit for a legally hunted lion will likely reduced the threat of extinction facing lions in Zimbabwe.

**17.32(a)(2)(v): The opinions or views of scientists or other persons or organizations having expertise concerning the wildlife or other matters germane to the application:**

From reviewing comments made during the listing process for lions, as well as information obtained through personal conversations and literature, there is general agreement that hunting, done properly and well managed, would not have an adverse effect on lion populations. Numerous researchers have stated that, while they may not support hunting in general, they see that benefits can be received through a scientifically based hunting program for lions.

Based on the information available to the Service, there is general support by scientists and other persons or organizations having expertise concerning lions that the legal harvest of lions, and the subsequent import of this trophy, would not have an adverse effect on the species, but would further efforts to conserve the species in the wild into the future.

**17.32(a)(2)(vi): Whether the expertise, facilities, or other resources available to the applicant appear adequate to successfully accomplish the objectives stated in the application:**

While, over the years, ZPWMA has failed to generate adequate revenue for its operations, U.S. sport hunters play a large role in the hunting industry of Zimbabwe. The Service anticipates that by granting the importation of sport-hunted lion trophies, there would be an increase in funds provided to Zimbabwe's conservation initiatives through this program by U.S. sport hunters. ZPWMA has also been forthcoming in involving relevant stakeholders as well as independent researchers and non-governmental organizations in determining best management practices.

Therefore, based on the information available to the Service, Zimbabwe has the proper expertise, facilities, and other resources to accomplish the objectives laid out in their *Strategy and Action Plan* to enhance the propagation and survival of the species, partly through the utilization of funds generated by U.S. hunters' participation in lion hunts throughout the country.

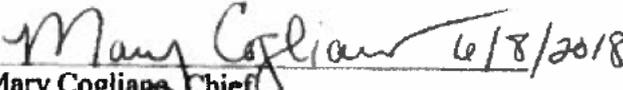
**Conclusion**

Given the status of lions within Zimbabwe at the time Mr. Swanson conducted his hunt, and the level of management and oversight provided to lions at that time, the Service is able to find that the harvest and import of Mr. Swanson's sport-hunted trophy taken in Zimbabwe on May 2, 2017, meets the purposes of the Act. As stated earlier, each application received by the Service for the import of a sport-hunted trophy lion from Zimbabwe will be evaluated on a case-by-case basis. The applicant must have hunted on a properly licensed hunting area within Zimbabwe. The Government of Zimbabwe must continue to implement the *Strategy and Action Plan* in the manner identified in the documents. The on-going adaptive management and limited off-take of lions is important to the survival of lions in Zimbabwe. Although the Service is able to make a finding that the import of this lion meets the enhancement criteria under the Act, the Service will continue to monitor the status and management of the lion in Zimbabwe. Noting that Zimbabwe's last management plan for lion was in 2006, the Service would like to see a current and updated plan that has been established as the national plan and disseminated across the country. The *Enhancement and Non-Detrimental Findings for Panthera leo in Zimbabwe* (2016), mentions a Management Plan for Hwange National Park; a copy of that and any other developed management plans will be considered in the future. Although Zimbabwe has made progress on their 2006 *Strategy and Action Plan*, the Service will

need to be continually updated on further progress of the outputs or targets. Lastly, the Service will also need to review any updates to the quota setting process.

Therefore, with the information available to the Service at the time Mr. Chancellor conducted his hunt, and in accordance with the issuance criteria laid out above, the Service is able to make a determination that the import of this lion will enhance the propagation or survival of the species. Therefore, the Service is able to authorize the import of one male lion trophy taken in Zimbabwe, to Mr. Steven **Elber** Chancellor of Evansville, Indiana.

 6/8/18  
Anna Barry, Acting Team Leader  
Branch of Permits  
Division of Management Authority

 6/8/2018  
Mary Cogliano, Chief  
Branch of Permits  
Division of Management Authority

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Permit Number: MA62562C-0  
Effective: 06/08/2018 Expires: 06/07/2019

Issuing Office:

Department of the Interior  
U.S. FISH AND WILDLIFE SERVICE  
DIVISION OF MANAGEMENT AUTHORITY  
BRANCH OF PERMITS, MS: IA  
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*Mary Cogliano*  
CHIEF, BRANCH OF PERMITS, DMA

Permittee:

STEVEN ELBERT CHANCELLOR

(b) (6)  
EVANSVILLE, IN (b) (6)  
U.S.A.

Authority: Statutes and Regulations: 50 CFR 17.40(r).

Location where authorized activity may be conducted:  
IMPORT THROUGH ANY PORT LISTED IN 50 CFR 14.12

Reporting requirements: Not applicable

Authorizations and Conditions:

- A. Authorized to import the sport-hunted trophy of one male African lion (*Panthera leo melanochaita*), taken in Zimbabwe for the purpose of enhancement of the survival of the species.
- B. Specimen may not be sold or transferred for any financial remuneration.
- C. Trophy must have been taken during the 2016 hunting season.
- D. Trophy must be accompanied by a valid trophy permit or hunting license issued by the government of Zimbabwe for the 2016 season.
- E. Trophy must be accompanied by a valid Convention on International Trade in Endangered Species (CITES) Appendix II export permit, source code "W", issued by the Management Authority of Zimbabwe.
- F. General conditions set out in Subpart D of 50 CFR 13, and specific conditions contained in Federal regulations cited above, are hereby made a part of this permit. All activities authorized herein must be carried out in accord with and for the purposes described in the application submitted. Continued validity, or renewal of this permit is subject to complete and timely compliance with all applicable conditions, including the filing of all required information and reports.
- G. The validity of this permit is also conditioned upon strict observance of all applicable foreign, state, local, tribal, or other federal law.
- H. Valid for use by permittee named above.
- I. Acceptance of this permit serves as evidence that the permittee understands and agrees to abide by the "General Permit Conditions" (copy attached).