

# Conversation Contents

**FW: Zim Lion Hunting and Research Report - update 20160131**

**Attachments:**

/5. FW: Zim Lion Hunting and Research Report - update 20160131/1.1 ZIMBABWE LION HUNTING & RESEARCH REPORT USFWS BdP 20160131.pdf  
/5. FW: Zim Lion Hunting and Research Report - update 20160131/1.2  
\_Certification\_.htm

**Pete Fick <petefick@gatorzw.com>**

---

**From:** Pete Fick <petefick@gatorzw.com>  
**Sent:** Thu Nov 23 2017 22:14:00 GMT-0700 (MST)  
**To:** <Greg\_J\_Sheehan@fws.gov>, <exsec@ios.doi.gov>  
**Subject:** FW: Zim Lion Hunting and Research Report - update 20160131  
**Attachments:** ZIMBABWE LION HUNTING & RESEARCH REPORT USFWS BdP 20160131.pdf \_Certification\_.htm

Further info you may not have seen.

---

**From:** Pete Fick [mailto:petefick@gatorzw.com]  
**Sent:** Friday, 11 March 2016 9:01 AM  
**To:** 'Joel.Mcgregor@dfat.gov.au'; Amanda.McGregor@international.gc.ca; Meyers, Rachel L (Harare) (MeyersRL@state.gov) (MeyersRL@state.gov); v@hara.diplo.de; Tom.Oppenheim@fco.gov.uk; Michele.SCHIVO@eeas.europa.eu; Severin.MELLAC@eeas.europa.eu; Corkey, Christopher T (Harare) (CorkeyCT@state.gov) (CorkeyCT@state.gov); John.Culley@fco.gov.uk; Patrice.Laquerre@international.gc.ca; Plemons, Katherine L (Harare) (PlemonsKL@state.gov) (PlemonsKL@state.gov)  
**Subject:** FW: Zim Lion Hunting and Research Report - update 20160131

Hi All

Please see attached lion report sent to USFWS (Tim Van Norman) in case you have not seen this.  
Regards Pete

# Conversation Contents

USFWS Issues Permits For Lions From Zimbabwe and Zambia

"Recce, Susan" <SRecce@nrahq.org>

---

**From:** "Recce, Susan" <SRecce@nrahq.org>  
**Sent:** Mon Oct 23 2017 09:37:09 GMT-0600 (MDT)  
**To:** "gregory\_sheehan@fws.gov" <gregory\_sheehan@fws.gov>  
**Subject:** USFWS Issues Permits For Lions From Zimbabwe and Zambia

Hi Greg,

I wanted to see if the information below is correct and if there is anything available on this directly from the Service.

Appreciate the help!

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**Gregory Sheehan <gregory\_sheehan@fws.gov>**

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**From:** Gregory Sheehan <gregory\_sheehan@fws.gov>  
**Sent:** Mon Oct 23 2017 23:26:35 GMT-0600 (MDT)  
**To:** "Recce, Susan" <SRecce@nrahq.org>  
**Subject:** Re: USFWS Issues Permits For Lions From Zimbabwe and Zambia

Susan  
Here is our link to more information.  
Thanks  
Greg

<https://www.fws.gov/international/permits/by-activity/sport-hunted-trophies-lions.html>

Greg Sheehan  
Principal Deputy Director  
US Fish and Wildlife Service  
202-208-4545 office  
202-676-7675 cell

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**To:** Recce, Susan  
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# African Elephants and Lions and the U.S. Endangered Species Act

Gregory Sheehan  
Principal Deputy Director  
U.S. Fish and Wildlife Service

November 20, 2017



# ESA Status

- African lions (*Panthera leo melanochaita*) and African elephants (*Loxodonta africana*) are listed as Threatened under the U.S. Endangered Species Act (ESA).
- Under current ESA special rules, import of parts of hunted elephants and lions requires an ESA permit, which can be issued if the Fish and Wildlife Service finds that the hunting activity enhances the survival of the species in the wild.
- Standard in place for elephants since 1992 and for lions since January 22, 2016.
- Factors that we consider include: species status; population trends; poaching levels; wildlife management plans; revenues generated by hunting and how they are used; how local communities benefit from sport hunting, etc.

Country status for import of elephant trophies from 2014 to present\*

	Approved for elephants hunted	Under Review	Not Approved for elephants hunted
<b>Namibia</b>	X		
<b>South Africa</b>	X		
<u>Tanzania</u>		January 1, 2016 and beyond	January 1, 2014 - December 31, 2015
<u>Zambia</u>	January 1, 2016 - December 31, 2018 <i>(Zambia closed its 2014-2015 hunting seasons)</i>		
<u>Zimbabwe</u>	January 21, 2016 - December 31, 2018		May 12, 2014 - January 20, 2016

# Elephant Findings

- Positive findings for South Africa and Namibia since the 1990s.
- Negative findings for Tanzania and Zimbabwe for 2014-2015. Positive findings from 1990s-2013.
- Positive findings for Zambia and Zimbabwe for 2016-2018.
- Mozambique and Tanzania for 2016+ under review.
- No applications pending for any other country.

## Country status for import of lion trophies\*

	Approved	Under Review	Not Approved to Date	Applies to Lions Hunted
<b>Mozambique</b>		X		
<b>Namibia</b>		X		
<u>South Africa: Wild Lions</u>	X			January 1, 2016 to December 31, 2019
<u>South Africa: Wild-Managed Lions</u>	X			January 1, 2016 to December 31, 2019
<u>South Africa: Captive Lions</u>			X	until new information is received
<b>Tanzania</b>		X		
<b>Zambia</b>	X			January 1, 2016 to December 31, 2018
<b>Zimbabwe</b>	X			January 1, 2016 to December 31, 2018

# Lion Findings

- Positive finding for “wild” and “wild-managed” lions from South Africa and a negative finding for “captive” lions for 2016-2019.
- Positive finding for Zambia and Zimbabwe for 2016-2018.
- Mozambique, Namibia and Tanzania under review.

# Permits Issued/Applications Pending

## **Permits issued/pending applications for lions:**

- Mozambique – 3 applications pending; no finding made
- Namibia – 2 applications pending; no finding made
- Tanzania – 17 applications pending; no finding made
- South Africa – 11 permits issued; none pending
- Zambia – 16 permits issued; none pending
- Zimbabwe – 17 permits issued; none pending

## **Permits issued/pending applications for elephants:**

- Namibia – 6 applications pending; positive finding
- Tanzania – 2 applications pending; no finding made
- South Africa – 11 applications pending; positive finding
- Zambia – 4 permits issued; positive finding
- Zimbabwe – 37 applications pending for elephants taken in 2014 (3), 2016 or 2017; negative finding for 2014-15; positive finding for 2016-18.

# Population Status

# Benefits of Big Game Hunting



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Lion and elephant table

### Attachments:

/9. Lion and elephant table/1.1 lion and elephant table.docx

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### Craig Hoover <craig\_hoover@fws.gov>

**From:** Craig Hoover <craig\_hoover@fws.gov>  
**Sent:** Mon Dec 04 2017 18:32:52 GMT-0700 (MST)  
**To:** Greg Sheehan <greg\_j\_sheehan@fws.gov>  
**CC:** Gloria Bell <gloria\_bell@fws.gov>, Tim Van Norman <tim\_vannorman@fws.gov>  
**Subject:** Lion and elephant table  
**Attachments:** lion and elephant table.docx

> Greg, > > Attached is a table that I hope is responsive. I limited it to lions and elephants as I can't think of any other species for which the current state of play is different from what it was in the last administration. I attempted to describe each country and lion/elephant status during 2009-16 and current. The biggest change, of course, is that the lion listing went into effect Jan. 22, 2016, which means that what was previously allowed was no longer authorized unless/until we made a positive ESA finding. > > Happy to discuss or revise as you see fit. > > craig

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### Greg Sheehan <greg\_j\_sheehan@fws.gov>

**From:** Greg Sheehan <greg\_j\_sheehan@fws.gov>  
**Sent:** Mon Dec 04 2017 21:45:34 GMT-0700 (MST)  
**To:** Craig Hoover <craig\_hoover@fws.gov>  
**CC:** Gloria Bell <gloria\_bell@fws.gov>, Tim Van Norman <tim\_vannorman@fws.gov>  
**Subject:** Re: Lion and elephant table

Thank you Craig. I believe that will work based on the limited guidance I received. Please stay tuned tomorrow morning as we may need additional information. Greg Greg Sheehan Principal Deputy Director US Fish and Wildlife Service 202-208-4545 office 202-676-7675 cell On Dec 4, 2017, at 8:32 PM, Craig Hoover <craig\_hoover@fws.gov> wrote: >> Greg, >> >> Attached is a table that I hope is responsive. I limited it to lions and elephants as I can't think of any other species for which the current state of play is different from what it was in the last administration. I attempted to describe each country and lion/elephant status during 2009-16 and current. The biggest change, of course, is that the lion listing went into effect Jan. 22, 2016, which means that what was previously allowed was no longer authorized unless/until we made a positive ESA finding. >> >> Happy to discuss or revise as you see fit. >> >> craig >

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### Lion conservation in Namibia

#### Attachments:

- /9. Lion conservation in Namibia/3.1 Namibia Lion Conservation Strategy\_July 2017.pdf
- /9. Lion conservation in Namibia/3.2 NW Lion Management Plan\_July 2017.pdf
- /9. Lion conservation in Namibia/5.1 Namibia Lion Conservation Strategy\_July 2017.pdf
- /9. Lion conservation in Namibia/5.2 NW Lion Management Plan\_July 2017.pdf

**Malan Lindeque <Malan.Lindeque@met.gov.na>**

---

**From:** Malan Lindeque <Malan.Lindeque@met.gov.na>  
**Sent:** Wed Jul 12 2017 01:12:20 GMT-0600 (MDT)  
**To:** "Gregory\_sheehan@fws.gov" <Gregory\_sheehan@fws.gov>  
louisa mupetami <louisa.mupetami@met.gov.na>, colgar sikopo  
<colgar.sikopo@met.gov.na>, elly hamunyela  
**CC:** <elly.hamunyela@met.gov.na>, kenneth uiseb  
<kenneth.uisieb@met.gov.na>  
**Subject:** Lion conservation in Namibia

Dear Mr Sheehan

I am aware that the Fish and Wildlife Service is currently considering lion conservation issues in a number of countries, possibly including Namibia. I wish to inform you that we will shortly be able to send you two key documents that we have developed in this regard, namely a new Lion Conservation Strategy for Namibia and a Human-Lion Conflict Management Plan for Northwestern Namibia (which was approved only yesterday). The latter is the first of a series of sub-national plans to deal with conflict issues.

Yours sincerely

Malan Lindeque  
Permanent Secretary  
Ministry of Environment and Tourism  
Namibia

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**"Sheehan, Gregory" <greg\_j\_sheehan@fws.gov>**

---

**From:** "Sheehan, Gregory" <greg\_j\_sheehan@fws.gov>  
**Sent:** Wed Jul 12 2017 06:16:06 GMT-0600 (MDT)  
**To:** Malan Lindeque <Malan.Lindeque@met.gov.na>

**CC:** louisa mupetami <louisa.mupetami@met.gov.na>, colgar sikopo <colgar.sikopo@met.gov.na>, elly hamunyela <elly.hamunyela@met.gov.na>, kenneth uiseb <kenneth.uiseb@met.gov.na>, "Hoover, Craig" <craig\_hoover@fws.gov>

**Subject:** Re: Lion conservation in Namibia

Thank you Mr. Lindeque

I am very much looking forward to receipt of those documents and plans. My contact information is detailed below should you not already have that information for our International office.

Thank you,  
Greg Sheehan

On Wed, Jul 12, 2017 at 3:12 AM, Malan Lindeque <[Malan.Lindeque@met.gov.na](mailto:Malan.Lindeque@met.gov.na)> wrote:

Dear Mr Sheehan

I am aware that the Fish and Wildlife Service is currently considering lion conservation issues in a number of countries, possibly including Namibia. I wish to inform you that we will shortly be able to send you two key documents that we have developed in this regard, namely a new Lion Conservation Strategy for Namibia and a Human-Lion Conflict Management Plan for Northwestern Namibia (which was approved only yesterday). The latter is the first of a series of sub-national plans to deal with conflict issues.

Yours sincerely

Malan Lindeque  
Permanent Secretary  
Ministry of Environment and Tourism  
Namibia

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--  
Greg Sheehan, Acting Director  
Principle Deputy Director  
US Fish and Wildlife Service  
1849 C Street NW, Room 3358  
Washington, DC 20240 USA

Phone 202-208-4545

---

**kenneth uiseb** <[kenneth.uiseb@met.gov.na](mailto:kenneth.uiseb@met.gov.na)>

**From:** kenneth uiseb <kenneth.uiseb@met.gov.na>  
**Sent:** Fri Aug 18 2017 04:37:15 GMT-0600 (MDT)  
**To:** "Gregory\_sheehan@fws.gov" <Gregory\_sheehan@fws.gov>  
louisa mupetami <louisa.mupetami@met.gov.na>, colgar sikopo

**CC:** <colgar.sikopo@met.gov.na>, elly hamunyela  
<elly.hamunyela@met.gov.na>, Malan Lindeque  
<Malan.Lindeque@met.gov.na>  
**Subject:** RE: Lion conservation in Namibia  
**Attachments:** Namibia Lion Conservation Strategy\_July 2017.pdf NW Lion  
Management Plan\_July 2017.pdf

Dear Mr. Sheehan,

I refer to the email below sent to you by Dr. Lindeque on 12 July 2017. Please find herewith attached the copies of the approved Lion Conservation Strategy for Namibia, and Human-Lion Conflict Management Plan for the North Western Namibia.

Yours sincerely,  
Kenneth Uiseb  
Deputy Director, Wildlife Monitoring and Research  
Ministry of Environment and Tourism

---

**From:** Malan Lindeque  
**Sent:** Wednesday, July 12, 2017 8:12 AM  
**To:** Gregory\_sheehan@fws.gov  
**Cc:** louisa mupetami <louisa.mupetami@met.gov.na>; colgar sikopo <colgar.sikopo@met.gov.na>; elly hamunyela <elly.hamunyela@met.gov.na>; kenneth uiseb <kenneth.uiseb@met.gov.na>  
**Subject:** Lion conservation in Namibia

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Yours sincerely

Malan Lindeque  
Permanent Secretary  
Ministry of Environment and Tourism  
Namibia

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**Gregory Sheehan <gregory\_sheehan@fws.gov>**

---

**From:** Gregory Sheehan <gregory\_sheehan@fws.gov>  
**Sent:** Fri Aug 18 2017 05:07:13 GMT-0600 (MDT)  
**To:** kenneth uiseb <kenneth.uiseb@met.gov.na>  
louisa mupetami <louisa.mupetami@met.gov.na>, colgar sikopo  
<colgar.sikopo@met.gov.na>, elly hamunyela  
**CC:** <elly.hamunyela@met.gov.na>, Malan Lindeque  
<Malan.Lindeque@met.gov.na>, gloria\_bell@fws.gov, Craig

Hoover <craig\_hoover@fws.gov>

**Subject:** Re: Lion conservation in Namibia

Thank you Kenneth and Malan. I will forward these to the review team now so they can begin reviewing them to quickly provide feedback and hopefully get to a positive finding that would be desired. Thank you Greg  
Greg Sheehan Principal Deputy Director US Fish and Wildlife Service 202-208-4545 office 202-676-7675 cell  
> On Aug 18, 2017, at 6:47 AM, kenneth uiseb <kenneth.uisieb@met.gov.na> wrote: > > Dear Mr. Sheehan, >  
> I refer to the email below sent to you by Dr. Lindeque on 12 July 2017. Please find herewith attached the  
copies of the approved Lion Conservation Strategy for Namibia, and Human-Lion Conflict Management Plan  
for the North Western Namibia. > > Yours sincerely, > Kenneth Uiseb > Deputy Director, Wildlife Monitoring  
and Research > Ministry of Environment and Tourism > > From: Malan Lindeque > Sent: Wednesday, July  
12, 2017 8:12 AM > To: Gregory\_sheehan@fws.gov > Cc: louisa mupetami <louisa.mupetami@met.gov.na>;  
colgar sikopo <colgar.sikopo@met.gov.na>; elly hamunyela <elly.hamunyela@met.gov.na>; kenneth uiseb  
<kenneth.uisieb@met.gov.na> > Subject: Lion conservation in Namibia > > Dear Mr Sheehan > > I am aware  
that the Fish and Wildlife Service is currently considering lion conservation issues in a number of countries,  
possibly including Namibia. I wish to inform you that we will shortly be able to send you two key documents  
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Lion Conflict Management Plan for Northwestern Namibia (which was approved only yesterday). The latter is  
the first of a series of sub-national plans to deal with conflict issues. > > Yours sincerely > > Malan Lindeque >  
Permanent Secretary > Ministry of Environment and Tourism > Namibia > The information contained in this e-  
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expressed in this message are those of the individual sender, except where the sender expressly, and with  
authority, states them to be the views of Government of the Republic of Namibia. Although this email has  
been checked for viruses and other defects, no responsibility can be accepted for any loss or damage arising  
from its receipt or use. > >

**Gregory Sheehan <gregory\_sheehan@fws.gov>**

---

**From:** Gregory Sheehan <gregory\_sheehan@fws.gov>  
**Sent:** Fri Aug 18 2017 05:07:42 GMT-0600 (MDT)  
**To:** gloria\_bell@fws.gov, Craig Hoover <craig\_hoover@fws.gov>  
**Subject:** Fwd: Lion conservation in Namibia  
**Attachments:** Namibia Lion Conservation Strategy\_July 2017.pdf NW Lion  
Management Plan\_July 2017.pdf

Per the prior email.  
Thanks  
Greg

Greg Sheehan  
Principal Deputy Director  
US Fish and Wildlife Service  
202-208-4545 office  
202-676-7675 cell

Begin forwarded message:

**From:** kenneth uiseb <[kenneth.uisieb@met.gov.na](mailto:kenneth.uisieb@met.gov.na)>  
**To:** "[Gregory\\_sheehan@fws.gov](mailto:Gregory_sheehan@fws.gov)" <[Gregory\\_sheehan@fws.gov](mailto:Gregory_sheehan@fws.gov)>  
**Cc:** louisa mupetami <[louisa.mupetami@met.gov.na](mailto:louisa.mupetami@met.gov.na)>, colgar sikopo  
<[colgar.sikopo@met.gov.na](mailto:colgar.sikopo@met.gov.na)>, elly hamunyela <[elly.hamunyela@met.gov.na](mailto:elly.hamunyela@met.gov.na)>, Malan Lindeque  
<[Malan.Lindeque@met.gov.na](mailto:Malan.Lindeque@met.gov.na)>  
**Subject:** RE: Lion conservation in Namibia

Dear Mr. Sheehan,

I refer to the email below sent to you by Dr. Lindeque on 12 July 2017. Please find herewith attached the copies of the approved Lion Conservation Strategy for Namibia, and Human-Lion Conflict Management Plan for the North Western Namibia.

Yours sincerely,  
Kenneth Uiseb  
Deputy Director, Wildlife Monitoring and Research  
Ministry of Environment and Tourism

---

**From:** Malan Lindeque  
**Sent:** Wednesday, July 12, 2017 8:12 AM  
**To:** [Gregory\\_sheehan@fws.gov](mailto:Gregory_sheehan@fws.gov)  
**Cc:** louisa mupetami <[louisa.mupetami@met.gov.na](mailto:louisa.mupetami@met.gov.na)>; colgar sikopo <[colgar.sikopo@met.gov.na](mailto:colgar.sikopo@met.gov.na)>; elly hamunyela <[elly.hamunyela@met.gov.na](mailto:elly.hamunyela@met.gov.na)>; kenneth uiseb <[kenneth.uiseb@met.gov.na](mailto:kenneth.uiseb@met.gov.na)>  
**Subject:** Lion conservation in Namibia

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Yours sincerely

Malan Lindeque  
Permanent Secretary  
Ministry of Environment and Tourism  
Namibia

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---

**"Hoover, Craig" <[craig\\_hoover@fws.gov](mailto:craig_hoover@fws.gov)>**

**From:** "Hoover, Craig" <[craig\\_hoover@fws.gov](mailto:craig_hoover@fws.gov)>  
**Sent:** Fri Aug 18 2017 06:11:45 GMT-0600 (MDT)  
**To:** Gregory Sheehan <[gregory\\_sheehan@fws.gov](mailto:gregory_sheehan@fws.gov)>  
**CC:** Gloria Bell <[gloria\\_bell@fws.gov](mailto:gloria_bell@fws.gov)>  
**Subject:** Re: Lion conservation in Namibia

Thanks Greg. We will begin reviewing ASAP.

craig

On Fri, Aug 18, 2017 at 7:07 AM, Gregory Sheehan <[gregory\\_sheehan@fws.gov](mailto:gregory_sheehan@fws.gov)> wrote:  
| Per the prior email.

Thanks  
Greg

Greg Sheehan  
Principal Deputy Director  
US Fish and Wildlife Service  
202-208-4545 office  
202-676-7675 cell

Begin forwarded message:

**From:** kenneth uiseb <[kenneth.uisieb@met.gov.na](mailto:kenneth.uisieb@met.gov.na)>  
**To:** "Gregory sheehan@fws.gov" <[Gregory\\_sheehan@fws.gov](mailto:Gregory_sheehan@fws.gov)>  
**Cc:** louisa mupetami <[louisa.mupetami@met.gov.na](mailto:louisa.mupetami@met.gov.na)>, colgar sikopo <[colgar.sikopo@met.gov.na](mailto:colgar.sikopo@met.gov.na)>, elly hamunyela <[elly.hamunyela@met.gov.na](mailto:elly.hamunyela@met.gov.na)>, Malan Lindeque <[Malan.Lindeque@met.gov.na](mailto:Malan.Lindeque@met.gov.na)>  
**Subject:** RE: Lion conservation in Namibia

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Yours sincerely,  
Kenneth Uiseb  
Deputy Director, Wildlife Monitoring and Research  
Ministry of Environment and Tourism

---

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**Sent:** Wednesday, July 12, 2017 8:12 AM  
**To:** [Gregory\\_sheehan@fws.gov](mailto:Gregory_sheehan@fws.gov)  
**Cc:** louisa mupetami <[louisa.mupetami@met.gov.na](mailto:louisa.mupetami@met.gov.na)>; colgar sikopo <[colgar.sikopo@met.gov.na](mailto:colgar.sikopo@met.gov.na)>; elly hamunyela <[elly.hamunyela@met.gov.na](mailto:elly.hamunyela@met.gov.na)>; kenneth uiseb <[kenneth.uisieb@met.gov.na](mailto:kenneth.uisieb@met.gov.na)>  
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Malan Lindeque  
Permanent Secretary  
Ministry of Environment and Tourism  
Namibia

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--

Craig Hoover  
Chief, Division of Management Authority  
International Affairs  
U.S. Fish and Wildlife Service  
5275 Leesburg Pike  
Falls Church, VA 22041-3803  
ph: 703-358-2162  
[www.fws.gov/international](http://www.fws.gov/international)

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**kenneth uiseb <kenneth.uisieb@met.gov.na>**

---

**From:** kenneth uiseb <kenneth.uisieb@met.gov.na>  
**Sent:** Fri Aug 18 2017 06:16:05 GMT-0600 (MDT)  
**To:** Gregory Sheehan <gregory\_sheehan@fws.gov>  
louisa mupetami <louisa.mupetami@met.gov.na>, colgar sikopo <colgar.sikopo@met.gov.na>, elly hamunyela <elly.hamunyela@met.gov.na>, Malan Lindeque <Malan.Lindeque@met.gov.na>, "gloria\_bell@fws.gov" <gloria\_bell@fws.gov>, Craig Hoover <craig\_hoover@fws.gov>  
**CC:**  
**Subject:** RE: Lion conservation in Namibia

Dear Greg, Thank you very much for the confirmation of receipt of the documents. Kind regards, Kenneth -----  
Original Message----- From: Gregory Sheehan [mailto:gregory\_sheehan@fws.gov] Sent: Friday, August 18, 2017 12:07 PM To: kenneth uiseb <kenneth.uisieb@met.gov.na> Cc: louisa mupetami <louisa.mupetami@met.gov.na>; colgar sikopo <colgar.sikopo@met.gov.na>; elly hamunyela <elly.hamunyela@met.gov.na>; Malan Lindeque <Malan.Lindeque@met.gov.na>; gloria\_bell@fws.gov; Craig Hoover <craig\_hoover@fws.gov> Subject: Re: Lion conservation in Namibia Thank you Kenneth and Malan. I will forward these to the review team now so they can begin reviewing them to quickly provide feedback and hopefully get to a positive finding that would be desired. Thank you Greg Gregory Sheehan Principal Deputy Director US Fish and Wildlife Service 202-208-4545 office 202-676-7675 cell > On Aug 18, 2017, at 6:47 AM, kenneth uiseb <kenneth.uisieb@met.gov.na> wrote: > > Dear Mr. Sheehan, > > I refer to the email below sent to you by Dr. Lindeque on 12 July 2017. Please find herewith attached the copies of the approved Lion Conservation Strategy for Namibia, and Human-Lion Conflict Management Plan for the North Western Namibia. > > Yours sincerely, > Kenneth Uiseb > Deputy Director, Wildlife Monitoring and Research Ministry of > Environment and Tourism > > From: Malan Lindeque > Sent: Wednesday, July 12, 2017 8:12 AM > To: Gregory\_sheehan@fws.gov > Cc: louisa mupetami <louisa.mupetami@met.gov.na>; colgar sikopo > <colgar.sikopo@met.gov.na>; elly hamunyela > <elly.hamunyela@met.gov.na>; kenneth uiseb <kenneth.uisieb@met.gov.na> > Subject: Lion conservation in Namibia > > Dear Mr Sheehan > > I am aware that the Fish and Wildlife Service is currently considering lion conservation issues in a number of countries, possibly including Namibia. I wish to inform you that we will shortly be able to send you two key documents that we have developed in this regard, namely a new Lion Conservation Strategy for Namibia and a Human-Lion Conflict Management Plan for Northwestern Namibia (which was approved only yesterday). The latter is the first of a series of sub-national plans to deal with conflict issues. > > Yours sincerely > > Malan Lindeque > Permanent Secretary > Ministry of Environment and Tourism > Namibia > The information contained in this e-mail is confidential and may be subject to legal privilege and/or the subject of copyright. If you are not the intended recipient, you must not use, copy, distribute or disclose the e-mail or any part of its contents or take

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# Conversation Contents

## 4(d) rules

### Attachments:

/10. 4(d) rules/1.1 4d rule revision-African elephant\_6 June 2016.pdf  
/10. 4(d) rules/1.2 Listing two lion subspecies\_final rule\_23 Dec 2015.pdf

**"Bell, Gloria" <gloria\_bell@fws.gov>**

---

**From:** "Bell, Gloria" <gloria\_bell@fws.gov>  
**Sent:** Mon Oct 23 2017 14:12:25 GMT-0600 (MDT)  
**To:** Greg Sheehan <greg\_j\_sheehan@fws.gov>  
**Subject:** 4(d) rules  
**Attachments:** 4d rule revision-African elephant\_6 June 2016.pdf Listing two lion subspecies\_final rule\_23 Dec 2015.pdf

Greg,

Per your request, the 4(d) rules for African elephant and two lion subspecies are attached below. The 4(d) rule for lion was done concurrently with the listing.

Gloria

Gloria Bell | Acting Assistant Director for International Affairs | U.S. Fish & Wildlife Service  
5275 Leesburg Pike, MS: IA, Falls Church, Virginia, 22041-3803, USA | 703-358-1767  
[www.fws.gov/international](http://www.fws.gov/international) | [Sign up](#) for our e-newsletter to learn how we're working around the globe to protect species and their habitats!



Learn more about [Diversity Change Agents](#).

**Greg Sheehan <greg\_j\_sheehan@fws.gov>**

---

**From:** Greg Sheehan <greg\_j\_sheehan@fws.gov>  
**Sent:** Mon Oct 23 2017 22:42:32 GMT-0600 (MDT)  
**To:** "Bell, Gloria" <gloria\_bell@fws.gov>  
**Subject:** Re: 4(d) rules

Thanks Gloria. I read those and will have language after walking over to ASFWP in the morning. Thanks Greg Greg Sheehan Principal Deputy Director US Fish and Wildlife Service 202-208-4545 office 202-676-7675 cell > On Oct 23, 2017, at 4:12 PM, Bell, Gloria <gloria\_bell@fws.gov> wrote: > > Greg, > > Per your request, the 4(d) rules for African elephant and two lion > subspecies are attached below. The 4(d) rule for lion was done > concurrently with the listing. > > Gloria > > > Gloria Bell | Acting Assistant Director for International Affairs |

> U.S. Fish & Wildlife Service > 5275 Leesburg Pike, MS: IA, Falls Church, Virginia, 22041-3803, USA | > 703-358-1767 > [www.fws.gov/international](http://www.fws.gov/international) | Sign up > > for > our e-newsletter to learn how we're working around the globe to protect > species and their habitats! > > [image: Stamp out extinction with the > Save Vanishing Species Stamp] > > \*Learn more about Diversity Change Agents > .\* > <4d rule revision-African elephant\_6 June 2016.pdf> >

# Conversation Contents

USFWS Issues Permits For Lions From Zimbabwe and Zambia

"Recce, Susan" <SRecce@nrahq.org>

---

**From:** "Recce, Susan" <SRecce@nrahq.org>  
**Sent:** Mon Oct 23 2017 09:37:09 GMT-0600 (MDT)  
**To:** "gregory\_sheehan@fws.gov" <gregory\_sheehan@fws.gov>  
**Subject:** USFWS Issues Permits For Lions From Zimbabwe and Zambia

Hi Greg,

I wanted to see if the information below is correct and if there is anything available on this directly from the Service.

Appreciate the help!

Susan



## Member Alert

### USFWS Issues Permits For Lions From Zimbabwe and Zambia

Safari Club International has learned from hunting industry sources in Africa that the U.S. Fish and Wildlife Service is mailing out permits for the importation of lions taken in Zimbabwe and Zambia.

"This is good news for hunters and SCI," said SCI President Paul Babaz. "We are extremely grateful for the work that the FWS has done to recognize how hunting in these countries enhances the survival of the species."

SCI does not have all the details about the permits being issued, but will update members as soon as more is learned.

Safari Club International - First For Hunters is the leader in protecting the freedom to hunt and in promoting wildlife conservation worldwide. SCI's approximately 200 Chapters represent all 50 of the United States as well as 106 other countries. SCI's proactive leadership in a host of cooperative wildlife conservation, outdoor education and humanitarian programs, with the SCI Foundation and other conservation groups, research institutions and government agencies, empowers sportsmen to be contributing community members and participants in sound wildlife management and conservation. Visit the home page [www.SafariClub.org](http://www.SafariClub.org), or call (520) 620-1220 for more information.

International Headquarters Tucson, Arizona · Washington, District of Columbia · Ottawa, Canada  
[www.SafariClub.org](http://www.SafariClub.org)

###

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4800 W. Gates Pass Rd. | Tucson, AZ 85745  
[click here to unsubscribe](#)

**Gregory Sheehan <gregory\_sheehan@fws.gov>**

---

**From:** Gregory Sheehan <gregory\_sheehan@fws.gov>  
**Sent:** Mon Oct 23 2017 23:26:35 GMT-0600 (MDT)  
**To:** "Recce, Susan" <SRecce@nrahq.org>  
**Subject:** Re: USFWS Issues Permits For Lions From Zimbabwe and Zambia

Susan  
Here is our link to more information.  
Thanks  
Greg

<https://www.fws.gov/international/permits/by-activity/sport-hunted-trophies-lions.html>

Greg Sheehan  
Principal Deputy Director  
US Fish and Wildlife Service  
202-208-4545 office  
202-676-7675 cell

On Oct 23, 2017, at 11:43 AM, Recce, Susan <[SRecce@nrahq.org](mailto:SRecce@nrahq.org)> wrote:

Hi Greg,

I wanted to see if the information below is correct and if there is anything available on this directly from the Service.

Appreciate the help!

Susan



## Member Alert

### **USFWS Issues Permits For Lions From Zimbabwe and Zambia**

Safari Club International has learned from hunting industry sources in Africa that the U.S. Fish and Wildlife Service is mailing out permits for the importation of lions taken in Zimbabwe and Zambia.

"This is good news for hunters and SCI," said SCI President Paul Babaz. "We are extremely grateful for the work that the FWS has done to recognize how hunting in these countries enhances the survival of the species."

SCI does not have all the details about the permits being issued, but will update members as soon as more is learned.

Safari Club International - First For Hunters is the leader in protecting the freedom to hunt and in promoting wildlife conservation worldwide. SCI's approximately 200 Chapters represent all 50 of the United States as well as 106 other countries. SCI's proactive leadership in a host of cooperative wildlife conservation, outdoor education and humanitarian programs, with the SCI Foundation and other conservation groups, research institutions and government agencies, empowers sportsmen to be contributing community members and participants in sound wildlife management and conservation. Visit the home page [www.SafariClub.org](http://www.SafariClub.org), or call (520) 620-1220 for more information.

International Headquarters Tucson, Arizona · Washington, District of Columbia · Ottawa, Canada  
[www.SafariClub.org](http://www.SafariClub.org)

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## "Recce, Susan" <[SRecce@nrahq.org](mailto:SRecce@nrahq.org)>

---

**From:** "Recce, Susan" <[SRecce@nrahq.org](mailto:SRecce@nrahq.org)>  
**Sent:** Tue Oct 24 2017 04:46:47 GMT-0600 (MDT)  
**To:** Gregory Sheehan <[gregory\\_sheehan@fws.gov](mailto:gregory_sheehan@fws.gov)>  
**Subject:** Re: USFWS Issues Permits For Lions From Zimbabwe and Zambia

Thanks so much, Greg. I tried a word searches on FWS' website and nothing came up. I also contacted Tim Vannorman who returned my email, but did not include the link you did. I very much appreciate having this information.

Best Regards,

Susan

---

**From:** Gregory Sheehan <[gregory\\_sheehan@fws.gov](mailto:gregory_sheehan@fws.gov)>  
**Sent:** Tuesday, October 24, 2017 1:26 AM  
**To:** Recce, Susan  
**Subject:** Re: USFWS Issues Permits For Lions From Zimbabwe and Zambia

Susan  
Here is our link to more information.  
Thanks  
Greg

<https://www.fws.gov/international/permits/by-activity/sport-hunted-trophies-lions.html>

Greg Sheehan  
Principal Deputy Director  
US Fish and Wildlife Service  
202-208-4545 office  
202-676-7675 cell

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International Headquarters Tucson, Arizona · Washington, District of Columbia · Ottawa, Canada  
[www.SafariClub.org](http://www.SafariClub.org)

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# Conversation Contents

## Appeal of Denial of Permit Applications PRT-04846C and PRT-04205C and Request for Oral Argument

### Attachments:

/13. Appeal of Denial of Permit Applications PRT-04846C and PRT-04205C and Request for Oral Argument/1.1 Appeal.pdf

/13. Appeal of Denial of Permit Applications PRT-04846C and PRT-04205C and Request for Oral Argument/1.2 Attach Supporting Chart.pdf

/13. Appeal of Denial of Permit Applications PRT-04846C and PRT-04205C and Request for Oral Argument/1.3 Attach Request Letter Finding.pdf

/13. Appeal of Denial of Permit Applications PRT-04846C and PRT-04205C and Request for Oral Argument/2.1 Appeal.pdf

/13. Appeal of Denial of Permit Applications PRT-04846C and PRT-04205C and Request for Oral Argument/2.2 Attach Supporting Chart.pdf

/13. Appeal of Denial of Permit Applications PRT-04846C and PRT-04205C and Request for Oral Argument/2.3 Attach Request Letter Finding.pdf

**"Regina A. Lennox" <regina.lennox@conservationforce.org>**

---

**From:** "Regina A. Lennox" <regina.lennox@conservationforce.org>  
**Sent:** Tue Jun 27 2017 10:28:41 GMT-0600 (MDT)  
**To:** <gregory\_sheehan@fws.gov>  
**CC:** Craig Hoover <craig\_hoover@fws.gov>, "John J. Jackson, III" <jjj@conservationforce.org>  
**Subject:** Appeal of Denial of Permit Applications PRT-04846C and PRT-04205C and Request for Oral Argument  
**Attachments:** Appeal.pdf Attach Supporting Chart.pdf Attach Request Letter Finding.pdf

Dear Director Sheehan:

We write to appeal the denial of the referenced permit applications, which seek to import lawfully hunted elephant trophies from Zimbabwe.

We respectfully request oral argument on this appeal. We look forward to explaining the enhancement generated for the elephant by regulated tourist hunting in Zimbabwe and summarizing the extensive documentation provided by Zimbabwe's wildlife management authority, Conservation Force, and others in support of this showing.

Please do not hesitate to contact us if you have questions about this appeal. The attached documents were also sent today by Federal Express.

Kind regards,

Regina A. Lennox  
**Conservation Force**  
3240 S I-10 Service Road W, Suite 200

Metairie, Louisiana 70001 USA  
504-837-1233 (office)  
919-452-8652 (cell)  
[regina.lennox@conservationforce.org](mailto:regina.lennox@conservationforce.org)

**"Sheehan, Gregory" <greg\_j\_sheehan@fws.gov>**

---

**From:** "Sheehan, Gregory" <greg\_j\_sheehan@fws.gov>  
**Sent:** Sun Jul 02 2017 20:48:31 GMT-0600 (MDT)  
**To:** "Hoover, Craig" <craig\_hoover@fws.gov>  
**Subject:** Fwd: Appeal of Denial of Permit Applications PRT-04846C and PRT-04205C and Request for Oral Argument  
**Attachments:** Appeal.pdf Attach Supporting Chart.pdf Attach Request Letter Finding.pdf

Hi Craig

So I know we discussed the background of the importation program a bit but I'm not sure where we landed on this issue but I am not sure if I still owe a reply to this email. Any thoughts?

Thanks  
Greg

----- Forwarded message -----

**From:** **Regina A. Lennox** <[regina.lennox@conservationforce.org](mailto:regina.lennox@conservationforce.org)>  
**Date:** Tue, Jun 27, 2017 at 12:28 PM  
**Subject:** Appeal of Denial of Permit Applications PRT-04846C and PRT-04205C and Request for Oral Argument  
**To:** [gregory\\_sheehan@fws.gov](mailto:gregory_sheehan@fws.gov)  
**Cc:** Craig Hoover <[craig\\_hoover@fws.gov](mailto:craig_hoover@fws.gov)>, "John J. Jackson, III" <[jjj@conservationforce.org](mailto:jjj@conservationforce.org)>

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Regina A. Lennox  
**Conservation Force**  
3240 S I-10 Service Road W, Suite 200  
Metairie, Louisiana 70001 USA

504-837-1233 (office)  
919-452-8652 (cell)  
[regina.lennox@conservationforce.org](mailto:regina.lennox@conservationforce.org)

--

Greg Sheehan, Acting Director  
Principle Deputy Director  
US Fish and Wildlife Service  
202-208-4545

## Conversation Contents

### Lion conservation in Namibia

#### Attachments:

/13. Lion conservation in Namibia/3.1 Namibia Lion Conservation Strategy\_July 2017.pdf  
/13. Lion conservation in Namibia/3.2 NW Lion Management Plan\_July 2017.pdf  
/13. Lion conservation in Namibia/5.1 Namibia Lion Conservation Strategy\_July 2017.pdf  
/13. Lion conservation in Namibia/5.2 NW Lion Management Plan\_July 2017.pdf

**Malan Lindeque <Malan.Lindeque@met.gov.na>**

---

**From:** Malan Lindeque <Malan.Lindeque@met.gov.na>  
**Sent:** Wed Jul 12 2017 01:12:20 GMT-0600 (MDT)  
**To:** "Gregory\_sheehan@fws.gov" <Gregory\_sheehan@fws.gov>  
louisa mupetami <louisa.mupetami@met.gov.na>, colgar sikopo  
<colgar.sikopo@met.gov.na>, elly hamunyela  
**CC:** <elly.hamunyela@met.gov.na>, kenneth uiseb  
<kenneth.uisieb@met.gov.na>  
**Subject:** Lion conservation in Namibia

Dear Mr Sheehan

I am aware that the Fish and Wildlife Service is currently considering lion conservation issues in a number of countries, possibly including Namibia. I wish to inform you that we will shortly be able to send you two key documents that we have developed in this regard, namely a new Lion Conservation Strategy for Namibia and a Human-Lion Conflict Management Plan for Northwestern Namibia (which was approved only yesterday). The latter is the first of a series of sub-national plans to deal with conflict issues.

Yours sincerely

Malan Lindeque  
Permanent Secretary  
Ministry of Environment and Tourism  
Namibia

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**"Sheehan, Gregory" <greg\_j\_sheehan@fws.gov>**

---

**From:** "Sheehan, Gregory" <greg\_j\_sheehan@fws.gov>

**Sent:** Wed Jul 12 2017 06:16:06 GMT-0600 (MDT)  
**To:** Malan Lindeque <Malan.Lindeque@met.gov.na>  
louisa mupetami <louisa.mupetami@met.gov.na>, colgar sikopo  
<colgar.sikopo@met.gov.na>, elly hamunyela  
**CC:** <elly.hamunyela@met.gov.na>, kenneth uiseb  
<kenneth.uiseb@met.gov.na>, "Hoover, Craig"  
<craig\_hoover@fws.gov>  
**Subject:** Re: Lion conservation in Namibia

Thank you Mr. Lindeque

I am very much looking forward to receipt of those documents and plans. My contact information is detailed below should you not already have that information for our International office.

Thank you,  
Greg Sheehan

On Wed, Jul 12, 2017 at 3:12 AM, Malan Lindeque <[Malan.Lindeque@met.gov.na](mailto:Malan.Lindeque@met.gov.na)> wrote:

Dear Mr Sheehan

I am aware that the Fish and Wildlife Service is currently considering lion conservation issues in a number of countries, possibly including Namibia. I wish to inform you that we will shortly be able to send you two key documents that we have developed in this regard, namely a new Lion Conservation Strategy for Namibia and a Human-Lion Conflict Management Plan for Northwestern Namibia (which was approved only yesterday). The latter is the first of a series of sub-national plans to deal with conflict issues.

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Ministry of Environment and Tourism  
Namibia

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--  
Greg Sheehan, Acting Director  
Principle Deputy Director  
US Fish and Wildlife Service  
1849 C Street NW, Room 3358  
Washington, DC 20240 USA

Phone 202-208-4545

**kenneth uiseb <kenneth.uiseb@met.gov.na>**

---

**From:** kenneth uiseb <kenneth.uiseb@met.gov.na>  
**Sent:** Fri Aug 18 2017 04:37:15 GMT-0600 (MDT)

**To:** "Gregory\_sheehan@fws.gov" <Gregory\_sheehan@fws.gov>  
louisa mupetami <louisa.mupetami@met.gov.na>, colgar sikopo  
<colgar.sikopo@met.gov.na>, elly hamunyela  
**CC:** <elly.hamunyela@met.gov.na>, Malan Lindeque  
<Malan.Lindeque@met.gov.na>  
**Subject:** RE: Lion conservation in Namibia  
**Attachments:** Namibia Lion Conservation Strategy\_July 2017.pdf NW Lion  
Management Plan\_July 2017.pdf

Dear Mr. Sheehan,

I refer to the email below sent to you by Dr. Lindeque on 12 July 2017. Please find herewith attached the copies of the approved Lion Conservation Strategy for Namibia, and Human-Lion Conflict Management Plan for the North Western Namibia.

Yours sincerely,  
Kenneth Uiseb  
Deputy Director, Wildlife Monitoring and Research  
Ministry of Environment and Tourism

---

**From:** Malan Lindeque  
**Sent:** Wednesday, July 12, 2017 8:12 AM  
**To:** Gregory\_sheehan@fws.gov  
**Cc:** louisa mupetami <louisa.mupetami@met.gov.na>; colgar sikopo <colgar.sikopo@met.gov.na>; elly hamunyela <elly.hamunyela@met.gov.na>; kenneth uiseb <kenneth.uiseb@met.gov.na>  
**Subject:** Lion conservation in Namibia

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Ministry of Environment and Tourism  
Namibia

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**Gregory Sheehan <gregory\_sheehan@fws.gov>**

**From:** Gregory Sheehan <gregory\_sheehan@fws.gov>  
**Sent:** Fri Aug 18 2017 05:07:13 GMT-0600 (MDT)  
**To:** kenneth uiseb <kenneth.uiseb@met.gov.na>  
louisa mupetami <louisa.mupetami@met.gov.na>, colgar sikopo

**CC:** <colgar.sikopo@met.gov.na>, elly hamunyela  
<elly.hamunyela@met.gov.na>, Malan Lindeque  
<Malan.Lindeque@met.gov.na>, gloria\_bell@fws.gov, Craig  
Hoover <craig\_hoover@fws.gov>  
**Subject:** Re: Lion conservation in Namibia

Thank you Kenneth and Malan. I will forward these to the review team now so they can begin reviewing them to quickly provide feedback and hopefully get to a positive finding that would be desired. Thank you Greg  
Greg Sheehan Principal Deputy Director US Fish and Wildlife Service 202-208-4545 office 202-676-7675 cell  
> On Aug 18, 2017, at 6:47 AM, kenneth uiseb <kenneth.uisieb@met.gov.na> wrote: > > Dear Mr. Sheehan, >  
> I refer to the email below sent to you by Dr. Lindeque on 12 July 2017. Please find herewith attached the  
copies of the approved Lion Conservation Strategy for Namibia, and Human-Lion Conflict Management Plan  
for the North Western Namibia. > > Yours sincerely, > Kenneth Uiseb > Deputy Director, Wildlife Monitoring  
and Research > Ministry of Environment and Tourism > > From: Malan Lindeque > Sent: Wednesday, July  
12, 2017 8:12 AM > To: Gregory\_sheehan@fws.gov > Cc: louisa mupetami <louisa.mupetami@met.gov.na>;  
colgar sikopo <colgar.sikopo@met.gov.na>; elly hamunyela <elly.hamunyela@met.gov.na>; kenneth uiseb  
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from its receipt or use. > >

**Gregory Sheehan <gregory\_sheehan@fws.gov>**

---

**From:** Gregory Sheehan <gregory\_sheehan@fws.gov>  
**Sent:** Fri Aug 18 2017 05:07:42 GMT-0600 (MDT)  
**To:** gloria\_bell@fws.gov, Craig Hoover <craig\_hoover@fws.gov>  
**Subject:** Fwd: Lion conservation in Namibia  
**Attachments:** Namibia Lion Conservation Strategy\_July 2017.pdf NW Lion  
Management Plan\_July 2017.pdf

Per the prior email.  
Thanks  
Greg

Greg Sheehan  
Principal Deputy Director  
US Fish and Wildlife Service  
202-208-4545 office  
202-676-7675 cell

Begin forwarded message:

**From:** kenneth uiseb <[kenneth.uisieb@met.gov.na](mailto:kenneth.uisieb@met.gov.na)>  
**To:** "[Gregory\\_sheehan@fws.gov](mailto:Gregory_sheehan@fws.gov)" <[Gregory\\_sheehan@fws.gov](mailto:Gregory_sheehan@fws.gov)>  
**Cc:** louisa mupetami <[louisa.mupetami@met.gov.na](mailto:louisa.mupetami@met.gov.na)>, colgar sikopo

<[colgar.sikopo@met.gov.na](mailto:colgar.sikopo@met.gov.na)>, elly hamunyela <[elly.hamunyela@met.gov.na](mailto:elly.hamunyela@met.gov.na)>, Malan Lindeque <[Malan.Lindeque@met.gov.na](mailto:Malan.Lindeque@met.gov.na)>

**Subject: RE: Lion conservation in Namibia**

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Yours sincerely,  
Kenneth Uiseb  
Deputy Director, Wildlife Monitoring and Research  
Ministry of Environment and Tourism

---

**From:** Malan Lindeque  
**Sent:** Wednesday, July 12, 2017 8:12 AM  
**To:** [Gregory\\_sheehan@fws.gov](mailto:Gregory_sheehan@fws.gov)  
**Cc:** louisa mupetami <[louisa.mupetami@met.gov.na](mailto:louisa.mupetami@met.gov.na)>; colgar sikopo <[colgar.sikopo@met.gov.na](mailto:colgar.sikopo@met.gov.na)>; elly hamunyela <[elly.hamunyela@met.gov.na](mailto:elly.hamunyela@met.gov.na)>; kenneth uiseb <[kenneth.uiseb@met.gov.na](mailto:kenneth.uiseb@met.gov.na)>  
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Ministry of Environment and Tourism  
Namibia

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---

**"Hoover, Craig" <[craig\\_hoover@fws.gov](mailto:craig_hoover@fws.gov)>**

**From:** "Hoover, Craig" <[craig\\_hoover@fws.gov](mailto:craig_hoover@fws.gov)>  
**Sent:** Fri Aug 18 2017 06:11:45 GMT-0600 (MDT)  
**To:** Gregory Sheehan <[gregory\\_sheehan@fws.gov](mailto:gregory_sheehan@fws.gov)>  
**CC:** Gloria Bell <[gloria\\_bell@fws.gov](mailto:gloria_bell@fws.gov)>  
**Subject:** Re: Lion conservation in Namibia

Thanks Greg. We will begin reviewing ASAP.

craig

On Fri, Aug 18, 2017 at 7:07 AM, Gregory Sheehan <[gregory\\_sheehan@fws.gov](mailto:gregory_sheehan@fws.gov)> wrote:

Per the prior email.

Thanks

Greg

Greg Sheehan  
Principal Deputy Director  
US Fish and Wildlife Service  
202-208-4545 office  
202-676-7675 cell

Begin forwarded message:

**From:** kenneth uiseb <[kenneth.uisieb@met.gov.na](mailto:kenneth.uisieb@met.gov.na)>  
**To:** "[Gregory sheehan@fws.gov](mailto:Gregory_sheehan@fws.gov)" <[Gregory\\_sheehan@fws.gov](mailto:Gregory_sheehan@fws.gov)>  
**Cc:** louisa mupetami <[louisa.mupetami@met.gov.na](mailto:louisa.mupetami@met.gov.na)>, colgar sikopo <[colgar.sikopo@met.gov.na](mailto:colgar.sikopo@met.gov.na)>, elly hamunyela <[elly.hamunyela@met.gov.na](mailto:elly.hamunyela@met.gov.na)>, Malan Lindeque <[Malan.Lindeque@met.gov.na](mailto:Malan.Lindeque@met.gov.na)>  
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Kenneth Uiseb  
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Ministry of Environment and Tourism

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**From:** Malan Lindeque  
**Sent:** Wednesday, July 12, 2017 8:12 AM  
**To:** [Gregory sheehan@fws.gov](mailto:Gregory_sheehan@fws.gov)  
**Cc:** louisa mupetami <[louisa.mupetami@met.gov.na](mailto:louisa.mupetami@met.gov.na)>; colgar sikopo <[colgar.sikopo@met.gov.na](mailto:colgar.sikopo@met.gov.na)>; elly hamunyela <[elly.hamunyela@met.gov.na](mailto:elly.hamunyela@met.gov.na)>; kenneth uiseb <[kenneth.uisieb@met.gov.na](mailto:kenneth.uisieb@met.gov.na)>  
**Subject:** Lion conservation in Namibia

Dear Mr Sheehan

I am aware that the Fish and Wildlife Service is currently considering lion conservation issues in a number of countries, possibly including Namibia. I wish to inform you that we will shortly be able to send you two key documents that we have developed in this regard, namely a new Lion Conservation Strategy for Namibia and a Human-Lion Conflict Management Plan for Northwestern Namibia (which was approved only yesterday). The latter is the first of a series of sub-national plans to deal with conflict issues.

Yours sincerely

Malan Lindeque  
Permanent Secretary  
Ministry of Environment and Tourism  
Namibia

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caused to the unintended recipient and any unauthorized distribution by the unintended recipient. Any views expressed in this message are those of the individual sender, except where the sender expressly, and with authority, states them to be the views of Government of the Republic of Namibia. Although this email has been checked for viruses and other defects, no responsibility can be accepted for any loss or damage arising from its receipt or use.

--

Craig Hoover  
Chief, Division of Management Authority  
International Affairs  
U.S. Fish and Wildlife Service  
5275 Leesburg Pike  
Falls Church, VA 22041-3803  
ph: 703-358-2162  
[www.fws.gov/international](http://www.fws.gov/international)

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**kenneth uiseb <kenneth.uisieb@met.gov.na>**

---

**From:** kenneth uiseb <kenneth.uisieb@met.gov.na>  
**Sent:** Fri Aug 18 2017 06:16:05 GMT-0600 (MDT)  
**To:** Gregory Sheehan <gregory\_sheehan@fws.gov>  
louisa mupetami <louisa.mupetami@met.gov.na>, colgar sikopo <colgar.sikopo@met.gov.na>, elly hamunyela <elly.hamunyela@met.gov.na>, Malan Lindeque <Malan.Lindeque@met.gov.na>, "gloria\_bell@fws.gov" <gloria\_bell@fws.gov>, Craig Hoover <craig\_hoover@fws.gov>  
**CC:**  
**Subject:** RE: Lion conservation in Namibia

Dear Greg, Thank you very much for the confirmation of receipt of the documents. Kind regards, Kenneth -----  
Original Message----- From: Gregory Sheehan [mailto:gregory\_sheehan@fws.gov] Sent: Friday, August 18, 2017 12:07 PM To: kenneth uiseb <kenneth.uisieb@met.gov.na> Cc: louisa mupetami <louisa.mupetami@met.gov.na>; colgar sikopo <colgar.sikopo@met.gov.na>; elly hamunyela <elly.hamunyela@met.gov.na>; Malan Lindeque <Malan.Lindeque@met.gov.na>; gloria\_bell@fws.gov; Craig Hoover <craig\_hoover@fws.gov> Subject: Re: Lion conservation in Namibia Thank you Kenneth and Malan. I will forward these to the review team now so they can begin reviewing them to quickly provide feedback and hopefully get to a positive finding that would be desired. Thank you Greg  
Greg Sheehan Principal Deputy Director US Fish and Wildlife Service 202-208-4545 office 202-676-7675 cell > On Aug 18, 2017, at 6:47 AM, kenneth uiseb <kenneth.uisieb@met.gov.na> wrote: > > Dear Mr. Sheehan, > > I refer to the email below sent to you by Dr. Lindeque on 12 July 2017. Please find herewith attached the copies of the approved Lion Conservation Strategy for Namibia, and Human-Lion Conflict Management Plan for the North Western Namibia. > > Yours sincerely, > Kenneth Uiseb > Deputy Director, Wildlife Monitoring and Research Ministry of > Environment and Tourism > > From: Malan Lindeque > Sent: Wednesday, July 12, 2017 8:12 AM > To: Gregory\_sheehan@fws.gov > Cc: louisa mupetami <louisa.mupetami@met.gov.na>; colgar sikopo > <colgar.sikopo@met.gov.na>; elly hamunyela > <elly.hamunyela@met.gov.na>; kenneth uiseb <kenneth.uisieb@met.gov.na> > Subject: Lion conservation in Namibia > > Dear Mr Sheehan > > I am aware that the Fish and Wildlife Service is currently considering lion conservation issues in a number of countries, possibly including Namibia. I wish to inform you that we will shortly be able to send you two key documents that we have developed in this regard, namely a new Lion Conservation Strategy for Namibia and a Human-Lion Conflict Management Plan for Northwestern Namibia (which was approved only yesterday). The latter is

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# Conversation Contents

**FW: Zim Lion Hunting and Research Report - update 20160131**

**Attachments:**

/14. FW: Zim Lion Hunting and Research Report - update 20160131/1.1 ZIMBABWE LION HUNTING & RESEARCH REPORT USFWS BdP 20160131.pdf

/14. FW: Zim Lion Hunting and Research Report - update 20160131/1.2 \_Certification\_.htm

**Pete Fick <petefick@gatorzw.com>**

---

**From:** Pete Fick <petefick@gatorzw.com>  
**Sent:** Thu Nov 23 2017 22:14:00 GMT-0700 (MST)  
**To:** <Greg\_J\_Sheehan@fws.gov>, <exsec@ios.doi.gov>  
**Subject:** FW: Zim Lion Hunting and Research Report - update 20160131  
**Attachments:** ZIMBABWE LION HUNTING & RESEARCH REPORT USFWS BdP 20160131.pdf \_Certification\_.htm

Further info you may not have seen.

---

**From:** Pete Fick [mailto:petefick@gatorzw.com]  
**Sent:** Friday, 11 March 2016 9:01 AM  
**To:** 'Joel.Mcgregor@dfat.gov.au'; Amanda.McGregor@international.gc.ca; Meyers, Rachel L (Harare) (MeyersRL@state.gov) (MeyersRL@state.gov); v@hara.diplo.de; Tom.Oppenheim@fco.gov.uk; Michele.SCHIVO@eeas.europa.eu; Severin.MELLAC@eeas.europa.eu; Corkey, Christopher T (Harare) (CorkeyCT@state.gov) (CorkeyCT@state.gov); John.Culley@fco.gov.uk; Patrice.Laquerre@international.gc.ca; Plemons, Katherine L (Harare) (PlemonsKL@state.gov) (PlemonsKL@state.gov)  
**Subject:** FW: Zim Lion Hunting and Research Report - update 20160131

Hi All

Please see attached lion report sent to USFWS (Tim Van Norman) in case you have not seen this.  
Regards Pete

# Conversation Contents

**drafts for Secretary briefing**

**Attachments:**

/15. drafts for Secretary briefing/1.1 Inf memo lion and elephant hunting 7-10-17 rev.docx

/15. drafts for Secretary briefing/1.2 Lion and Elephant ESA Listings 1-pager.docx

/15. drafts for Secretary briefing/7.1 Lion and Elephant ESA Listings 1-pager public.docx

/15. drafts for Secretary briefing/7.2 Inf memo lion and elephant hunting 7-10-17 rev2.docx

**"Hoover, Craig" <craig\_hoover@fws.gov>**

---

**From:** "Hoover, Craig" <craig\_hoover@fws.gov>  
**Sent:** Mon Jul 10 2017 14:25:44 GMT-0600 (MDT)  
**To:** Gregory Sheehan <gregory\_sheehan@fws.gov>, "Sheehan, Gregory" <greg\_j\_sheehan@fws.gov>  
**CC:** Charisa Morris <charisa\_morris@fws.gov>, Tim Van Norman <tim\_vannorman@fws.gov>  
**Subject:** drafts for Secretary briefing  
**Attachments:** Inf memo lion and elephant hunting 7-10-17 rev.docx Lion and Elephant ESA Listings 1-pager.docx

Greg,

Please find attached a one-page document and a longer briefing paper for tomorrow's briefing with the Secretary. I hope these hit the right notes, but please let me know if there is anything you'd like included that is missing, etc. I will check in this evening and again tomorrow morning to help however you see fit.

Best,

Craig

--

Craig Hoover  
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ph: 703-358-2162  
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## Greg Sheehan <greg\_j\_sheehan@fws.gov>

---

**From:** Greg Sheehan <greg\_j\_sheehan@fws.gov>  
**Sent:** Mon Jul 10 2017 18:51:55 GMT-0600 (MDT)  
**To:** "Hoover, Craig" <craig\_hoover@fws.gov>  
**CC:** Gregory Sheehan <gregory\_sheehan@fws.gov>, Charisa Morris <charisa\_morris@fws.gov>, Tim Van Norman <tim\_vannorman@fws.gov>  
**Subject:** Re: drafts for Secretary briefing

Craig,

These look very good. Thank you for preparing them. Please work with Charisa to get those to the Department communications team in advance of the meeting. Please 14 hard copies of each of these for the meeting.

I will literally arrive at the Secretary's office right at 3 pm if all goes well as I land back at Dulles Airport at 1:40 pm.

Please plan to take an explanatory lead on these after I do a brief introduction.

Thanks  
Greg

Greg Sheehan, Acting Director  
Principal Deputy Director  
US Fish and Wildlife Service  
202-208-4545 office  
202-676-7675 cell

On Jul 10, 2017, at 2:26 PM, Hoover, Craig <[craig\\_hoover@fws.gov](mailto:craig_hoover@fws.gov)> wrote:

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<Inf memo lion and elephant hunting 7-10-17 rev.docx>

<Lion and Elephant ESA Listings 1-pager.docx>

## **Craig Hoover <craig\_hoover@fws.gov>**

---

**From:** Craig Hoover <craig\_hoover@fws.gov>  
**Sent:** Mon Jul 10 2017 19:00:56 GMT-0600 (MDT)  
**To:** Greg Sheehan <greg\_j\_sheehan@fws.gov>  
Gregory Sheehan <gregory\_sheehan@fws.gov>, Charisa Morris  
**CC:** <charisa\_morris@fws.gov>, Tim Van Norman  
<tim\_vannorman@fws.gov>  
**Subject:** Re: drafts for Secretary briefing

Thanks Greg. Safe travels. We will work together to have it all set. See you there.

Craig

Sent from my iPhone

On Jul 10, 2017, at 8:51 PM, Greg Sheehan <[greg\\_j\\_sheehan@fws.gov](mailto:greg_j_sheehan@fws.gov)> wrote:

Craig,

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<Inf memo lion and elephant hunting 7-10-17 rev.docx>

<Lion and Elephant ESA Listings 1-pager.docx>

**Gregory Sheehan <[gregory\\_sheehan@fws.gov](mailto:gregory_sheehan@fws.gov)>**

---

**From:** Gregory Sheehan <[gregory\\_sheehan@fws.gov](mailto:gregory_sheehan@fws.gov)>  
**Sent:** Tue Jul 11 2017 08:05:36 GMT-0600 (MDT)  
**To:** Greg Sheehan <[greg\\_j\\_sheehan@fws.gov](mailto:greg_j_sheehan@fws.gov)>  
"Hoover, Craig" <[craig\\_hoover@fws.gov](mailto:craig_hoover@fws.gov)>, Charisa Morris  
<[charisa\\_morris@fws.gov](mailto:charisa_morris@fws.gov)>, Tim Van Norman  
<[tim\\_vannorman@fws.gov](mailto:tim_vannorman@fws.gov)>  
**CC:**  
**Subject:** Re: drafts for Secretary briefing

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<Lion and Elephant ESA Listings 1-pager.docx>

**"Hoover, Craig" <[craig\\_hoover@fws.gov](mailto:craig_hoover@fws.gov)>**

---

**From:** "Hoover, Craig" <[craig\\_hoover@fws.gov](mailto:craig_hoover@fws.gov)>  
**Sent:** Tue Jul 11 2017 08:12:49 GMT-0600 (MDT)  
**To:** Gregory Sheehan <[gregory\\_sheehan@fws.gov](mailto:gregory_sheehan@fws.gov)>  
**CC:** Greg Sheehan <[greg\\_j\\_sheehan@fws.gov](mailto:greg_j_sheehan@fws.gov)>, Charisa Morris <[charisa\\_morris@fws.gov](mailto:charisa_morris@fws.gov)>  
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**"Morris, Charisa" <[charisa\\_morris@fws.gov](mailto:charisa_morris@fws.gov)>**

---

**From:** "Morris, Charisa" <[charisa\\_morris@fws.gov](mailto:charisa_morris@fws.gov)>  
**Sent:** Tue Jul 11 2017 09:17:00 GMT-0600 (MDT)  
**To:** "Hoover, Craig" <[craig\\_hoover@fws.gov](mailto:craig_hoover@fws.gov)>  
**CC:** Gregory Sheehan <[gregory\\_sheehan@fws.gov](mailto:gregory_sheehan@fws.gov)>, Greg Sheehan <[greg\\_j\\_sheehan@fws.gov](mailto:greg_j_sheehan@fws.gov)>  
**Subject:** Re: drafts for Secretary briefing

More specifically, in light of the fact that certain external parties may be present, should we bring SOL?

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[Charisa.Morris@fws.gov](mailto:Charisa.Morris@fws.gov) | Chief of Staff, Office of the Director | U.S. Fish & Wildlife Service | 1849 C Street NW, Room 3348 | Washington, DC 20240 | (202) 208-3843 | For urgent matters, please dial cell: 301-875-8937

**"Hoover, Craig" <craig\_hoover@fws.gov>**

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**From:** "Hoover, Craig" <craig\_hoover@fws.gov>  
**Sent:** Tue Jul 11 2017 09:41:09 GMT-0600 (MDT)  
**To:** "Morris, Charisa" <charisa\_morris@fws.gov>  
**CC:** Gregory Sheehan <gregory\_sheehan@fws.gov>, Greg Sheehan <greg\_j\_sheehan@fws.gov>  
**Subject:** Re: drafts for Secretary briefing  
**Attachments:** Lion and Elephant ESA Listings 1-pager public.docx Inf memo lion and elephant hunting 7-10-17 rev2.docx

Charisa,

Here's a one-pager that I would feel comfortable sharing with external stakeholders as well. Also, I am reattaching the briefing paper (which is still internal use only) with a few edits. There was reference to attachments that we are not providing in the previous version, which may be confusing. Addressed in this version.

craig

On Tue, Jul 11, 2017 at 11:17 AM, Morris, Charisa <[charisa\\_morris@fws.gov](mailto:charisa_morris@fws.gov)> wrote:  
| More specifically, in light of the fact that certain external parties may be present, should we

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<Inf memo lion and elephant hunting 7-10-17 rev.docx>

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Craig Hoover  
Chief, Division of Management Authority  
International Affairs  
U.S. Fish and Wildlife Service  
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--

[Charisa Morris@fws.gov](mailto:Charisa.Morris@fws.gov) | Chief of Staff, Office of the Director | U.S. Fish & Wildlife Service |  
1849 C Street NW, Room 3348 | Washington, DC 20240 | (202) 208-3843 | For urgent matters, please dial cell:  
301-875-8937

--

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## Conversation Contents

**Fwd: USA Import Permits for Free Roaming Lion; South Africa.**

**Attachments:**

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/15. Fwd: USA Import Permits for Free Roaming Lion; South Africa./2.1 Nuutbegin Header smaller 15.22.59 15.22.59 15.22.59.jpeg

/15. Fwd: USA Import Permits for Free Roaming Lion; South Africa./3.1 Nuutbegin Header smaller 15.22.59 15.22.59 15.22.59.jpeg

**"Regina A. Lennox" <[regina.lennox@conservationforce.org](mailto:regina.lennox@conservationforce.org)>**

---

**From:** "Regina A. Lennox" <[regina.lennox@conservationforce.org](mailto:regina.lennox@conservationforce.org)>  
**Sent:** Tue Jun 20 2017 10:08:02 GMT-0600 (MDT)  
**To:** "Vannorman, Tim" <[tim\\_vannorman@fws.gov](mailto:tim_vannorman@fws.gov)>, Craig Hoover <[craig\\_hoover@fws.gov](mailto:craig_hoover@fws.gov)>  
**CC:** <[greg\\_sheehan@fws.gov](mailto:greg_sheehan@fws.gov)>, <[gregory\\_sheehan@fws.gov](mailto:gregory_sheehan@fws.gov)>, "John J. Jackson, III" <[cf@conservationforce.org](mailto:cf@conservationforce.org)>, <[exsec@ios.doi.gov](mailto:exsec@ios.doi.gov)>  
**Subject:** Fwd: USA Import Permits for Free Roaming Lion; South Africa.  
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To avoid any further detriment for the lion, we respectfully request the DMA proceed with the update of the positive, 2016 enhancement finding for wild and wild-managed lion trophy imports from South Africa.

Sincerely,

Regina A. Lennox

**Conservation Force**

3240 S I-10 Service Road W, Suite 200

Metairie, Louisiana 70001 USA

504-837-1233 (office)

919-452-8652 (cell)

[regina.lennox@conservationforce.org](mailto:regina.lennox@conservationforce.org)

----- Forwarded message -----

From: **David Griesel**

Date: Thu, Jun 15, 2017 at 7:35 AM

Subject: USA Import Permits for Free Roaming Lion; South Africa.

To: [regina.lennox@conservationforce.org](mailto:regina.lennox@conservationforce.org)

Dear Madam Lennox

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Kind regards

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**"Hoover, Craig" <craig\_hoover@fws.gov>**

---

**From:** "Hoover, Craig" <craig\_hoover@fws.gov>  
**Sent:** Tue Jun 20 2017 15:34:53 GMT-0600 (MDT)  
**To:** "Regina A. Lennox" <regina.lennox@conservationforce.org>  
"Vannorman, Tim" <tim\_vannorman@fws.gov>,  
**CC:** greg\_sheehan@fws.gov, gregory\_sheehan@fws.gov, "John J. Jackson, III" <cf@conservationforce.org>, EXSEC EXSEC <exsec@ios.doi.gov>  
**Subject:** Re: USA Import Permits for Free Roaming Lion; South Africa.  
**Attachments:** Nuutbegin Header smaller 15.22.59 15.22.59 15.22.59.jpeg

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**"Regina A. Lennox" <regina.lennox@conservationforce.org>**

---

**From:** "Regina A. Lennox" <regina.lennox@conservationforce.org>  
**Sent:** Tue Jun 20 2017 16:11:43 GMT-0600 (MDT)  
**To:** "Hoover, Craig" <craig\_hoover@fws.gov>  
"Vannorman, Tim" <tim\_vannorman@fws.gov>,  
**CC:** <gregory\_sheehan@fws.gov>, "John J. Jackson, III" <cf@conservationforce.org>, EXSEC EXSEC <exsec@ios.doi.gov>  
**Subject:** Re: USA Import Permits for Free Roaming Lion; South Africa.  
**Attachments:** Nuutbegin Header smaller 15.22.59 15.22.59 15.22.59.jpeg

Dear Craig,  
Since you kindly opened the door to additional questions: have you anticipated any dates for preparation of the enhancement findings for lion trophy imports from Mozambique, Namibia, Tanzania, Zambia, or Zimbabwe?  
Thanks,  
Regina

Regina A. Lennox  
**Conservation Force**  
3240 S I-10 Service Road W, Suite 200  
Metairie, Louisiana 70001 USA  
[504-837-1233](tel:504-837-1233) (office)  
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[regina.lennox@conservationforce.org](mailto:regina.lennox@conservationforce.org)

On Tue, Jun 20, 2017 at 4:34 PM, Hoover, Craig <[craig\\_hoover@fws.gov](mailto:craig_hoover@fws.gov)> wrote:

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**Gregory Sheehan <[gregory\\_sheehan@fws.gov](mailto:gregory_sheehan@fws.gov)>**

**From:** Gregory Sheehan <[gregory\\_sheehan@fws.gov](mailto:gregory_sheehan@fws.gov)>  
**Sent:** Wed Jun 21 2017 09:24:30 GMT-0600 (MDT)  
**To:** "Hoover, Craig" <[craig\\_hoover@fws.gov](mailto:craig_hoover@fws.gov)>  
**Subject:** Re: USA Import Permits for Free Roaming Lion; South Africa.

Hi Craig.  
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Sent from my iPhone

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**"Hoover, Craig" <craig\_hoover@fws.gov>**

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**From:** "Hoover, Craig" <craig\_hoover@fws.gov>  
**Sent:** Wed Jun 21 2017 12:47:33 GMT-0600 (MDT)  
**To:** Gregory Sheehan <gregory\_sheehan@fws.gov>  
**CC:** Bryan Arroyo <bryan\_arroyo@fws.gov>, Gloria Bell <gloria\_bell@fws.gov>, Tim Van Norman <tim\_vannorman@fws.gov>  
**Subject:** Re: USA Import Permits for Free Roaming Lion; South Africa.

Greg,

First and foremost, welcome aboard! I look forward to meeting you and talking more about International Affairs' work. I'll reach out to Roslyn to set up a briefing today. It would be helpful to know how broad you want this discussion to be. We can certainly cover lions and South Africa specifically, or lion findings more broadly. I just want to be sure that we meet your expectations and have the right info for you. Let me know and I'll get the briefing set up.

Best,

Craig

On Wed, Jun 21, 2017 at 11:24 AM, Gregory Sheehan <[gregory\\_sheehan@fws.gov](mailto:gregory_sheehan@fws.gov)> wrote:

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U.S. clients lined up for lion hunts. But the clients are concerned about their ability to obtain U.S. import permits for their lion trophies.

We understand that the (undated) enhancement finding made in October 2016, which approves wild and wild-managed lion trophy imports from South Africa, is being applied only to the 2016 season. Although Tim advised that this finding was likely to be updated in January, it apparently has not been. My emails to Tim asking about the update status have received no response.

As Dr. Griesel's email explains, the reserve has a certain carrying capacity. The lion will need to be managed. But the DMA's delay in updating the positive, 2016 enhancement finding and failure to issue 2017 lion trophy import permits is limiting the options available to reserve managers like Dr. Griesel.

To avoid any further detriment for the lion, we respectfully request the DMA proceed with the update of the positive, 2016 enhancement finding for wild and wild-managed lion trophy imports from South Africa.

Sincerely,

Regina A. Lennox

**Conservation Force**

3240 S I-10 Service Road W, Suite 200

Metairie, Louisiana 70001 USA

504-837-1233 (office)

919-452-8652 (cell)

[regina.lennox@conservationforce.org](mailto:regina.lennox@conservationforce.org)

----- Forwarded message -----

From: **David Griesel**

Date: Thu, Jun 15, 2017 at 7:35 AM

Subject: USA Import Permits for Free Roaming Lion; South Africa.

To: [regina.lennox@conservationforce.org](mailto:regina.lennox@conservationforce.org)

Dear Madam Lennox

I am the owner of Nuutbegin Nature Reserve, situated on the South African - Botswana boundary in the far Northern area of the South African Kalahari area.

Nuutbegin (means a new beginning), is approximately  $\pm$  23,600ha (  $\pm$  60,000

acres) in extend. I was formerly an owner in the Timbavati Private Game Reserve, adjoining the world renowned Kruger National Park. I also served as chairman of the Timbavati's Executive Board for 14 years. From this, my passion for conservation of Nature and the pristine African Lion and game. Nuutbegin was established as a Nature Reserve by buying and consolidated 8 cattle ranches to re-introduce the original species that once prouded this beautiful part of the Kalahari. Our Lion population originated from the well known Kgalagadi Transfronterior National Park, well known for its black maned and golden faced Lion.

From the original 4 Lion introduced in 2011, we presently have 32 lion roaming Nuutbegin Nature Reserve. We appointed Prof Noel van Rooyen, co-author of the international book "Game Farm Management" edited by Prof J du P Bothma, to do a comprehensive habitat and management study for Nuutbegin. Prof van Rooyen advised that we should only accommodate 20- 24 lion, depending on our total plains game population and climatic conditions on Nuutbegin, to be in harmony with the carrying capacity for lion, plains game and area of Nuutbegin. It is thus vital for our long term healthy lion population of the indigenous Kalahari Lion, that we should manage our population.

We accordingly decided to have the excess males hunted before they form coalitions and start to prey on our Free Roaming buffalo herd. We proofed to be absolutely correct with our management decision because the first buffalo bull

was killed yesterday by 4 big males. These males were exactly the males we thought, to be hunted.

Our Local authorities are very well aware of the Nuutbegin as home of the Free Roaming Lion. They were involved of the inspection and certifying our facilities as above the expected standard to keep free roaming lion. They accordingly certified the Reserve as a full Exempted Property (Permit No 10059 and 25615, copies attached), and fully capable of keeping Free Roaming lion. A Hunting permit can and must be applied for if and when we have the detail of the hunter, Outfitter and date of the hunt.

It appears that there is some difficulties or objections from your dept. of Conservation and Fisheries. I cannot understand what these difficulties can possibly be. Our permits are indeed correct, we invested a large amount to ensure the conservation of our natural Kalahari Lion population. Our decision to have the obvious excessive lion hunted to maintain a sound and healthy ecosystem for them, is purely a sound management decision.

Madam, may I kindly beg your kind assistance, advice and recommendation in this matter.

I am taking the liberty to approach you because inter alia it is already late in the hunting season. Our prospective hunters from the USA must finalise their personal arrangements, get their air traveling arrangements in order. I do thank you with anticipation of your kind assistance.

Kind regards

Dr David Griesel.

<Nuutbegin Header smaller 15.22.59 15.22.59 15.22.59.jpeg>

--

Craig Hoover  
Chief, Division of Management Authority  
International Affairs  
U.S. Fish and Wildlife Service  
5275 Leesburg Pike  
Falls Church, VA 22041-3803  
ph: 703-358-2162  
[www.fws.gov/international](http://www.fws.gov/international)

***[Sign up](#) for our e-newsletter to learn how we're working around the globe to protect species and their habitats!***



--

Craig Hoover  
Chief, Division of Management Authority  
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**[Sign up](#) for our e-newsletter to learn how we're working around the globe to protect species and their habitats!**



## Conversation Contents

### Lion conservation in Namibia

#### Attachments:

- /16. Lion conservation in Namibia/3.1 Namibia Lion Conservation Strategy\_July 2017.pdf
- /16. Lion conservation in Namibia/3.2 NW Lion Management Plan\_July 2017.pdf
- /16. Lion conservation in Namibia/5.1 Namibia Lion Conservation Strategy\_July 2017.pdf
- /16. Lion conservation in Namibia/5.2 NW Lion Management Plan\_July 2017.pdf

**Malan Lindeque <Malan.Lindeque@met.gov.na>**

---

**From:** Malan Lindeque <Malan.Lindeque@met.gov.na>  
**Sent:** Wed Jul 12 2017 01:12:20 GMT-0600 (MDT)  
**To:** "Gregory\_sheehan@fws.gov" <Gregory\_sheehan@fws.gov>  
louisa mupetami <louisa.mupetami@met.gov.na>, colgar sikopo  
<colgar.sikopo@met.gov.na>, elly hamunyela  
**CC:** <elly.hamunyela@met.gov.na>, kenneth uiseb  
<kenneth.uisieb@met.gov.na>  
**Subject:** Lion conservation in Namibia

Dear Mr Sheehan

I am aware that the Fish and Wildlife Service is currently considering lion conservation issues in a number of countries, possibly including Namibia. I wish to inform you that we will shortly be able to send you two key documents that we have developed in this regard, namely a new Lion Conservation Strategy for Namibia and a Human-Lion Conflict Management Plan for Northwestern Namibia (which was approved only yesterday). The latter is the first of a series of sub-national plans to deal with conflict issues.

Yours sincerely

Malan Lindeque  
Permanent Secretary  
Ministry of Environment and Tourism  
Namibia

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**"Sheehan, Gregory" <greg\_j\_sheehan@fws.gov>**

---

**From:** "Sheehan, Gregory" <greg\_j\_sheehan@fws.gov>

**Sent:** Wed Jul 12 2017 06:16:06 GMT-0600 (MDT)  
**To:** Malan Lindeque <Malan.Lindeque@met.gov.na>  
louisa mupetami <louisa.mupetami@met.gov.na>, colgar sikopo  
<colgar.sikopo@met.gov.na>, elly hamunyela  
**CC:** <elly.hamunyela@met.gov.na>, kenneth uiseb  
<kenneth.uiseb@met.gov.na>, "Hoover, Craig"  
<craig\_hoover@fws.gov>  
**Subject:** Re: Lion conservation in Namibia

Thank you Mr. Lindeque

I am very much looking forward to receipt of those documents and plans. My contact information is detailed below should you not already have that information for our International office.

Thank you,  
Greg Sheehan

On Wed, Jul 12, 2017 at 3:12 AM, Malan Lindeque <[Malan.Lindeque@met.gov.na](mailto:Malan.Lindeque@met.gov.na)> wrote:

Dear Mr Sheehan

I am aware that the Fish and Wildlife Service is currently considering lion conservation issues in a number of countries, possibly including Namibia. I wish to inform you that we will shortly be able to send you two key documents that we have developed in this regard, namely a new Lion Conservation Strategy for Namibia and a Human-Lion Conflict Management Plan for Northwestern Namibia (which was approved only yesterday). The latter is the first of a series of sub-national plans to deal with conflict issues.

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Permanent Secretary  
Ministry of Environment and Tourism  
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--  
Greg Sheehan, Acting Director  
Principle Deputy Director  
US Fish and Wildlife Service  
1849 C Street NW, Room 3358  
Washington, DC 20240 USA

Phone 202-208-4545

**kenneth uiseb <kenneth.uiseb@met.gov.na>**

---

**From:** kenneth uiseb <kenneth.uiseb@met.gov.na>  
**Sent:** Fri Aug 18 2017 04:37:15 GMT-0600 (MDT)

**To:** "Gregory\_sheehan@fws.gov" <Gregory\_sheehan@fws.gov>  
louisa mupetami <louisa.mupetami@met.gov.na>, colgar sikopo  
<colgar.sikopo@met.gov.na>, elly hamunyela  
**CC:** <elly.hamunyela@met.gov.na>, Malan Lindeque  
<Malan.Lindeque@met.gov.na>  
**Subject:** RE: Lion conservation in Namibia  
**Attachments:** Namibia Lion Conservation Strategy\_July 2017.pdf NW Lion  
Management Plan\_July 2017.pdf

Dear Mr. Sheehan,

I refer to the email below sent to you by Dr. Lindeque on 12 July 2017. Please find herewith attached the copies of the approved Lion Conservation Strategy for Namibia, and Human-Lion Conflict Management Plan for the North Western Namibia.

Yours sincerely,  
Kenneth Uiseb  
Deputy Director, Wildlife Monitoring and Research  
Ministry of Environment and Tourism

---

**From:** Malan Lindeque  
**Sent:** Wednesday, July 12, 2017 8:12 AM  
**To:** Gregory\_sheehan@fws.gov  
**Cc:** louisa mupetami <louisa.mupetami@met.gov.na>; colgar sikopo <colgar.sikopo@met.gov.na>; elly hamunyela <elly.hamunyela@met.gov.na>; kenneth uiseb <kenneth.uiseb@met.gov.na>  
**Subject:** Lion conservation in Namibia

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Yours sincerely

Malan Lindeque  
Permanent Secretary  
Ministry of Environment and Tourism  
Namibia

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**Gregory Sheehan <gregory\_sheehan@fws.gov>**

**From:** Gregory Sheehan <gregory\_sheehan@fws.gov>  
**Sent:** Fri Aug 18 2017 05:07:13 GMT-0600 (MDT)  
**To:** kenneth uiseb <kenneth.uiseb@met.gov.na>  
louisa mupetami <louisa.mupetami@met.gov.na>, colgar sikopo

**CC:** <colgar.sikopo@met.gov.na>, elly hamunyela  
<elly.hamunyela@met.gov.na>, Malan Lindeque  
<Malan.Lindeque@met.gov.na>, gloria\_bell@fws.gov, Craig  
Hoover <craig\_hoover@fws.gov>  
**Subject:** Re: Lion conservation in Namibia

Thank you Kenneth and Malan. I will forward these to the review team now so they can begin reviewing them to quickly provide feedback and hopefully get to a positive finding that would be desired. Thank you Greg  
Greg Sheehan Principal Deputy Director US Fish and Wildlife Service 202-208-4545 office 202-676-7675 cell  
> On Aug 18, 2017, at 6:47 AM, kenneth uiseb <kenneth.uisieb@met.gov.na> wrote: > > Dear Mr. Sheehan, >  
> I refer to the email below sent to you by Dr. Lindeque on 12 July 2017. Please find herewith attached the  
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for the North Western Namibia. > > Yours sincerely, > Kenneth Uiseb > Deputy Director, Wildlife Monitoring  
and Research > Ministry of Environment and Tourism > > From: Malan Lindeque > Sent: Wednesday, July  
12, 2017 8:12 AM > To: Gregory\_sheehan@fws.gov > Cc: louisa mupetami <louisa.mupetami@met.gov.na>;  
colgar sikopo <colgar.sikopo@met.gov.na>; elly hamunyela <elly.hamunyela@met.gov.na>; kenneth uiseb  
<kenneth.uisieb@met.gov.na> > Subject: Lion conservation in Namibia > > Dear Mr Sheehan > > I am aware  
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from its receipt or use. > >

**Gregory Sheehan <gregory\_sheehan@fws.gov>**

---

**From:** Gregory Sheehan <gregory\_sheehan@fws.gov>  
**Sent:** Fri Aug 18 2017 05:07:42 GMT-0600 (MDT)  
**To:** gloria\_bell@fws.gov, Craig Hoover <craig\_hoover@fws.gov>  
**Subject:** Fwd: Lion conservation in Namibia  
**Attachments:** Namibia Lion Conservation Strategy\_July 2017.pdf NW Lion  
Management Plan\_July 2017.pdf

Per the prior email.  
Thanks  
Greg

Greg Sheehan  
Principal Deputy Director  
US Fish and Wildlife Service  
202-208-4545 office  
202-676-7675 cell

Begin forwarded message:

**From:** kenneth uiseb <[kenneth.uisieb@met.gov.na](mailto:kenneth.uisieb@met.gov.na)>  
**To:** "[Gregory\\_sheehan@fws.gov](mailto:Gregory_sheehan@fws.gov)" <[Gregory\\_sheehan@fws.gov](mailto:Gregory_sheehan@fws.gov)>  
**Cc:** louisa mupetami <[louisa.mupetami@met.gov.na](mailto:louisa.mupetami@met.gov.na)>, colgar sikopo

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**Subject: RE: Lion conservation in Namibia**

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Yours sincerely,  
Kenneth Uiseb  
Deputy Director, Wildlife Monitoring and Research  
Ministry of Environment and Tourism

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**Sent:** Wednesday, July 12, 2017 8:12 AM  
**To:** [Gregory\\_sheehan@fws.gov](mailto:Gregory_sheehan@fws.gov)  
**Cc:** louisa mupetami <[louisa.mupetami@met.gov.na](mailto:louisa.mupetami@met.gov.na)>; colgar sikopo <[colgar.sikopo@met.gov.na](mailto:colgar.sikopo@met.gov.na)>; elly hamunyela <[elly.hamunyela@met.gov.na](mailto:elly.hamunyela@met.gov.na)>; kenneth uiseb <[kenneth.uiseb@met.gov.na](mailto:kenneth.uiseb@met.gov.na)>  
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---

**"Hoover, Craig" <[craig\\_hoover@fws.gov](mailto:craig_hoover@fws.gov)>**

**From:** "Hoover, Craig" <[craig\\_hoover@fws.gov](mailto:craig_hoover@fws.gov)>  
**Sent:** Fri Aug 18 2017 06:11:45 GMT-0600 (MDT)  
**To:** Gregory Sheehan <[gregory\\_sheehan@fws.gov](mailto:gregory_sheehan@fws.gov)>  
**CC:** Gloria Bell <[gloria\\_bell@fws.gov](mailto:gloria_bell@fws.gov)>  
**Subject:** Re: Lion conservation in Namibia

Thanks Greg. We will begin reviewing ASAP.

craig

On Fri, Aug 18, 2017 at 7:07 AM, Gregory Sheehan <[gregory\\_sheehan@fws.gov](mailto:gregory_sheehan@fws.gov)> wrote:

Per the prior email.

Thanks

Greg

Greg Sheehan  
Principal Deputy Director  
US Fish and Wildlife Service  
202-208-4545 office  
202-676-7675 cell

Begin forwarded message:

**From:** kenneth uiseb <[kenneth.uisieb@met.gov.na](mailto:kenneth.uisieb@met.gov.na)>  
**To:** "[Gregory sheehan@fws.gov](mailto:Gregory_sheehan@fws.gov)" <[Gregory\\_sheehan@fws.gov](mailto:Gregory_sheehan@fws.gov)>  
**Cc:** louisa mupetami <[louisa.mupetami@met.gov.na](mailto:louisa.mupetami@met.gov.na)>, colgar sikopo <[colgar.sikopo@met.gov.na](mailto:colgar.sikopo@met.gov.na)>, elly hamunyela <[elly.hamunyela@met.gov.na](mailto:elly.hamunyela@met.gov.na)>, Malan Lindeque <[Malan.Lindeque@met.gov.na](mailto:Malan.Lindeque@met.gov.na)>  
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Kenneth Uiseb  
Deputy Director, Wildlife Monitoring and Research  
Ministry of Environment and Tourism

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**From:** Malan Lindeque  
**Sent:** Wednesday, July 12, 2017 8:12 AM  
**To:** [Gregory sheehan@fws.gov](mailto:Gregory_sheehan@fws.gov)  
**Cc:** louisa mupetami <[louisa.mupetami@met.gov.na](mailto:louisa.mupetami@met.gov.na)>; colgar sikopo <[colgar.sikopo@met.gov.na](mailto:colgar.sikopo@met.gov.na)>; elly hamunyela <[elly.hamunyela@met.gov.na](mailto:elly.hamunyela@met.gov.na)>; kenneth uiseb <[kenneth.uisieb@met.gov.na](mailto:kenneth.uisieb@met.gov.na)>  
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Yours sincerely

Malan Lindeque  
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Ministry of Environment and Tourism  
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Craig Hoover  
Chief, Division of Management Authority  
International Affairs  
U.S. Fish and Wildlife Service  
5275 Leesburg Pike  
Falls Church, VA 22041-3803  
ph: 703-358-2162  
[www.fws.gov/international](http://www.fws.gov/international)

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**kenneth uiseb <kenneth.uisieb@met.gov.na>**

---

**From:** kenneth uiseb <kenneth.uisieb@met.gov.na>  
**Sent:** Fri Aug 18 2017 06:16:05 GMT-0600 (MDT)  
**To:** Gregory Sheehan <gregory\_sheehan@fws.gov>  
louisa mupetami <louisa.mupetami@met.gov.na>, colgar sikopo <colgar.sikopo@met.gov.na>, elly hamunyela <elly.hamunyela@met.gov.na>, Malan Lindeque <Malan.Lindeque@met.gov.na>, "gloria\_bell@fws.gov" <gloria\_bell@fws.gov>, Craig Hoover <craig\_hoover@fws.gov>  
**CC:**  
**Subject:** RE: Lion conservation in Namibia

Dear Greg, Thank you very much for the confirmation of receipt of the documents. Kind regards, Kenneth -----  
Original Message----- From: Gregory Sheehan [mailto:gregory\_sheehan@fws.gov] Sent: Friday, August 18, 2017 12:07 PM To: kenneth uiseb <kenneth.uisieb@met.gov.na> Cc: louisa mupetami <louisa.mupetami@met.gov.na>; colgar sikopo <colgar.sikopo@met.gov.na>; elly hamunyela <elly.hamunyela@met.gov.na>; Malan Lindeque <Malan.Lindeque@met.gov.na>; gloria\_bell@fws.gov; Craig Hoover <craig\_hoover@fws.gov> Subject: Re: Lion conservation in Namibia Thank you Kenneth and Malan. I will forward these to the review team now so they can begin reviewing them to quickly provide feedback and hopefully get to a positive finding that would be desired. Thank you Greg  
Greg Sheehan Principal Deputy Director US Fish and Wildlife Service 202-208-4545 office 202-676-7675 cell > On Aug 18, 2017, at 6:47 AM, kenneth uiseb <kenneth.uisieb@met.gov.na> wrote: > > Dear Mr. Sheehan, > > I refer to the email below sent to you by Dr. Lindeque on 12 July 2017. Please find herewith attached the copies of the approved Lion Conservation Strategy for Namibia, and Human-Lion Conflict Management Plan for the North Western Namibia. > > Yours sincerely, > Kenneth Uiseb > Deputy Director, Wildlife Monitoring and Research Ministry of > Environment and Tourism > > From: Malan Lindeque > Sent: Wednesday, July 12, 2017 8:12 AM > To: Gregory\_sheehan@fws.gov > Cc: louisa mupetami <louisa.mupetami@met.gov.na>; colgar sikopo > <colgar.sikopo@met.gov.na>; elly hamunyela > <elly.hamunyela@met.gov.na>; kenneth uiseb <kenneth.uisieb@met.gov.na> > Subject: Lion conservation in Namibia > > Dear Mr Sheehan > > I am aware that the Fish and Wildlife Service is currently considering lion conservation issues in a number of countries, possibly including Namibia. I wish to inform you that we will shortly be able to send you two key documents that we have developed in this regard, namely a new Lion Conservation Strategy for Namibia and a Human-Lion Conflict Management Plan for Northwestern Namibia (which was approved only yesterday). The latter is

the first of a series of sub-national plans to deal with conflict issues. > > Yours sincerely > > Malan Lindeque > Permanent Secretary > Ministry of Environment and Tourism > Namibia > The information contained in this e-mail is confidential and may be subject to legal privilege and/or the subject of copyright. If you are not the intended recipient, you must not use, copy, distribute or disclose the e-mail or any part of its contents or take any action in reliance on it. If you have received this e-mail in error, please e-mail the sender by replying to this message. The Government of the Republic of Namibia shall not be held liable for any damages so caused to the unintended recipient and any unauthorized distribution by the unintended recipient. Any views expressed in this message are those of the individual sender, except where the sender expressly, and with authority, states them to be the views of Government of the Republic of Namibia. Although this email has been checked for viruses and other defects, no responsibility can be accepted for any loss or damage arising from its receipt or use. > Plan\_July 2017.pdf> The information contained in this e-mail is confidential and may be subject to legal privilege and/or the subject of copyright. If you are not the intended recipient, you must not use, copy, distribute or disclose the e-mail or any part of its contents or take any action in reliance on it. If you have received this e-mail in error, please e-mail the sender by replying to this message. The Government of the Republic of Namibia shall not be held liable for any damages so caused to the unintended recipient and any unauthorized distribution by the unintended recipient. Any views expressed in this message are those of the individual sender, except where the sender expressly, and with authority, states them to be the views of Government of the Republic of Namibia. Although this email has been checked for viruses and other defects, no responsibility can be accepted for any loss or damage arising from its receipt or use.

# Conversation Contents

**FW: Zimbabwe BVC Lion Research Report for USFWS 2016**

**Attachments:**

/37. FW: Zimbabwe BVC Lion Research Report for USFWS 2016/1.1  
BVCRLionReport.USFWS-BdP20160112\_Rose.docx  
/37. FW: Zimbabwe BVC Lion Research Report for USFWS 2016/1.2  
\_Certification\_.htm

**Pete Fick <petefick@gatorzw.com>**

---

**From:** Pete Fick <petefick@gatorzw.com>  
**Sent:** Fri Nov 24 2017 22:36:00 GMT-0700 (MST)  
**To:** <Greg\_J\_Sheehan@fws.gov>  
**Subject:** FW: Zimbabwe BVC Lion Research Report for USFWS 2016  
**Attachments:** BVCRLionReport.USFWS-BdP20160112\_Rose.docx  
\_Certification\_.htm

BVC lion report sent FWS January 2016.

---

**From:** Pete Fick [mailto:petefick@gatorzw.com]  
**Sent:** Wednesday, 13 January 2016 11:41 PM  
**To:** tim\_vannorman@fws.gov  
**Subject:** Zimbabwe BVC Lion Research Report for USFWS 2016

Sorry, had the wrong email address before.

---

**From:** Pete Fick [mailto:petefick@gatorzw.com]  
**Sent:** Wednesday, January 13, 2016 6:19 PM  
**To:** 'tim'  
**Cc:** mazunga@mazsaf.com; 'Byron du Preez'  
**Subject:** Zimbabwe BVC Lion Research Report for USFWS 2016

Dear Mr. Vannorman

I am a passionate conservationist very involved in the Buby Valley Conservancy.

I have attached an up to date report on our lion situation in the BVC – Zimbabwe.

I believe you are aware that the BVC has the biggest lion success story ever in Africa. Therefore, for the sake of our lions I truly hope we are not held ransom due to possibly other areas in our country not meeting USFWLS criteria.

I am in the US until 8 February if you wish to talk to me about the BVC lion situation – my cell 3476023993. I am also open to flying to DC to meet with you if you wish (?).

Kind regards, Pete Fick

**From:** Rose Mandisodza-Chikerema [mailto:(b)(6)@gmail.com]  
**Sent:** Tuesday, January 12, 2016 4:51 PM  
**To:** Pete Fick  
**Cc:** Mazunga Safaris; olivia mufute; Byron du Preez  
**Subject:** Re: FW: BVCR Lion Research Report for USFWS 2016

Dear All,

I have read the report and made a few editorials. I think you have done a great job to highlight the BVC lion issue. Please find the report attached.

Warm regards

Rose (Zim Parks)

On 12 January 2016 at 16:41, Rose Mandisodza-Chikerema <(b)(6)@gmail.com> wrote:

# Conversation Contents

## Tanzania Consultative Forum

### Attachments:

/39. Tanzania Consultative Forum/1.1 Invitation Letter\_USFWS\_Sheehan.pdf  
/39. Tanzania Consultative Forum/1.2 AWCF 2017\_Draft Agenda\_5September2017 (1).pdf

## "Hoover, Craig" <craig\_hoover@fws.gov>

---

**From:** "Hoover, Craig" <craig\_hoover@fws.gov>  
**Sent:** Thu Sep 14 2017 09:57:28 GMT-0600 (MDT)  
**To:** Gregory Sheehan <gregory\_sheehan@fws.gov>, "Sheehan, Gregory" <greg\_j\_sheehan@fws.gov>  
**CC:** Gloria Bell <gloria\_bell@fws.gov>, Tim Van Norman <tim\_vannorman@fws.gov>, Charisa Morris <charisa\_morris@fws.gov>  
**Subject:** Tanzania Consultative Forum  
**Attachments:** Invitation Letter\_USFWS\_Sheehan.pdf AWCF 2017\_Draft Agenda\_5September2017 (1).pdf

Greg,

As you may recall, I recently raised with you the possibility of your attending the African Wildlife Consultative Forum, co-hosted by the Government of Tanzania and Safari Club International Foundation, and scheduled for November 13-17. I know it may be a heavy lift in terms of approval, but we think it would be a very worthwhile meeting for you to attend. We typically attend to discuss ESA and CITES issues and to work with participating governments and other stakeholders to determine how legal obligations can be met.

Attached is an invitation and draft agenda for the meeting. We could also arrange additional opportunities for you to see our work in the region if that would add to the likelihood of approval.

Please let us know your thoughts and if you need anything else.

Best,

Craig

--

Craig Hoover  
Chief, Division of Management Authority  
International Affairs  
U.S. Fish and Wildlife Service  
5275 Leesburg Pike  
Falls Church, VA 22041-3803  
ph: 703-358-2162  
[www.fws.gov/international](http://www.fws.gov/international)

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## Gregory Sheehan <gregory\_sheehan@fws.gov>

---

**From:** Gregory Sheehan <gregory\_sheehan@fws.gov>  
**Sent:** Fri Sep 15 2017 06:20:15 GMT-0600 (MDT)  
**To:** "Hoover, Craig" <craig\_hoover@fws.gov>  
"Sheehan, Gregory" <greg\_j\_sheehan@fws.gov>, Gloria Bell  
<gloria\_bell@fws.gov>, Tim Van Norman  
**CC:** <tim\_vannorman@fws.gov>, Charisa Morris  
<charisa\_morris@fws.gov>  
**Subject:** Re: Tanzania Consultative Forum

Thank you Craig. I believe that the Foundation will reach out to DOI to request that I attend this meeting. It looks like it would be a huge assistance for me to continue to learn of these issues. Will let you know if I hear anything.

Thanks  
Greg

Greg Sheehan  
Principal Deputy Director  
US Fish and Wildlife Service  
202-208-4545 office  
202-676-7675 cell

On Sep 14, 2017, at 11:57 AM, Hoover, Craig <[craig\\_hoover@fws.gov](mailto:craig_hoover@fws.gov)> wrote:

Greg,

As you may recall, I recently raised with you the possibility of your attending the African Wildlife Consultative Forum, co-hosted by the Government of Tanzania and Safari Club International Foundation, and scheduled for November 13-17. I know it may be a heavy lift in terms of approval, but we think it would be a very worthwhile meeting for you to attend. We typically attend to discuss ESA and CITES issues and to work with participating governments and other stakeholders to determine how legal obligations can be met.

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Please let us know your thoughts and if you need anything else.

Best,

Craig

--

Craig Hoover  
Chief, Division of Management Authority  
International Affairs  
U.S. Fish and Wildlife Service  
5275 Leesburg Pike  
Falls Church, VA 22041-3803  
ph: 703-358-2162  
[www.fws.gov/international](http://www.fws.gov/international)

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<Invitation Letter\_USFWS\_Sheehan.pdf>

<AWCF 2017\_Draft Agenda\_5September2017 (1).pdf>

# Conversation Contents

**FW: Zimbabwe BVC Lion Research Report for USFWS 2016**

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/41. FW: Zimbabwe BVC Lion Research Report for USFWS 2016/1.2  
\_Certification\_.htm

**Pete Fick <petefick@gatorzw.com>**

---

**From:** Pete Fick <petefick@gatorzw.com>  
**Sent:** Fri Nov 24 2017 22:36:00 GMT-0700 (MST)  
**To:** <Greg\_J\_Sheehan@fws.gov>  
**Subject:** FW: Zimbabwe BVC Lion Research Report for USFWS 2016  
**Attachments:** BVCRLionReport.USFWS-BdP20160112\_Rose.docx  
\_Certification\_.htm

BVC lion report sent FWS January 2016.

---

**From:** Pete Fick [mailto:petefick@gatorzw.com]  
**Sent:** Wednesday, 13 January 2016 11:41 PM  
**To:** tim\_vannorman@fws.gov  
**Subject:** Zimbabwe BVC Lion Research Report for USFWS 2016

Sorry, had the wrong email address before.

---

**From:** Pete Fick [mailto:petefick@gatorzw.com]  
**Sent:** Wednesday, January 13, 2016 6:19 PM  
**To:** 'tim'  
**Cc:** mazunga@mazsaf.com; 'Byron du Preez'  
**Subject:** Zimbabwe BVC Lion Research Report for USFWS 2016

Dear Mr. Vannorman

I am a passionate conservationist very involved in the Buby Valley Conservancy.

I have attached an up to date report on our lion situation in the BVC – Zimbabwe.

I believe you are aware that the BVC has the biggest lion success story ever in Africa. Therefore, for the sake of our lions I truly hope we are not held ransom due to possibly other areas in our country not meeting USFWLS criteria.

I am in the US until 8 February if you wish to talk to me about the BVC lion situation – my cell 3476023993. I am also open to flying to DC to meet with you if you wish (?).

Kind regards, Pete Fick

**From:** Rose Mandisodza-Chikerema [mailto:(b)(6)@gmail.com]  
**Sent:** Tuesday, January 12, 2016 4:51 PM  
**To:** Pete Fick  
**Cc:** Mazunga Safaris; olivia mufute; Byron du Preez  
**Subject:** Re: FW: BVCR Lion Research Report for USFWS 2016

Dear All,

I have read the report and made a few editorials. I think you have done a great job to highlight the BVC lion issue. Please find the report attached.

Warm regards

Rose (Zim Parks)

On 12 January 2016 at 16:41, Rose Mandisodza-Chikerema <(b)(6)@gmail.com> wrote:

# Conversation Contents

**FW: Zim Lion Hunting and Research Report - update 20160131**

**Attachments:**

/50. FW: Zim Lion Hunting and Research Report - update 20160131/1.1 ZIMBABWE LION HUNTING & RESEARCH REPORT USFWS BdP 20160131.pdf

/50. FW: Zim Lion Hunting and Research Report - update 20160131/1.2 \_Certification\_.htm

**Pete Fick <petefick@gatorzw.com>**

---

**From:** Pete Fick <petefick@gatorzw.com>  
**Sent:** Thu Nov 23 2017 22:14:00 GMT-0700 (MST)  
**To:** <Greg\_J\_Sheehan@fws.gov>, <exsec@ios.doi.gov>  
**Subject:** FW: Zim Lion Hunting and Research Report - update 20160131  
**Attachments:** ZIMBABWE LION HUNTING & RESEARCH REPORT USFWS BdP 20160131.pdf \_Certification\_.htm

Further info you may not have seen.

---

**From:** Pete Fick [mailto:petefick@gatorzw.com]  
**Sent:** Friday, 11 March 2016 9:01 AM  
**To:** 'Joel.Mcgregor@dfat.gov.au'; Amanda.McGregor@international.gc.ca; Meyers, Rachel L (Harare) (MeyersRL@state.gov) (MeyersRL@state.gov); v@hara.diplo.de; Tom.Oppenheim@fco.gov.uk; Michele.SCHIVO@eeas.europa.eu; Severin.MELLAC@eeas.europa.eu; Corkey, Christopher T (Harare) (CorkeyCT@state.gov) (CorkeyCT@state.gov); John.Culley@fco.gov.uk; Patrice.Laquerre@international.gc.ca; Plemons, Katherine L (Harare) (PlemonsKL@state.gov) (PlemonsKL@state.gov)  
**Subject:** FW: Zim Lion Hunting and Research Report - update 20160131

Hi All

Please see attached lion report sent to USFWS (Tim Van Norman) in case you have not seen this.  
Regards Pete

# Conversation Contents

**FW: Zim Lion Hunting and Research Report - update 20160131**

**Attachments:**

/57. FW: Zim Lion Hunting and Research Report - update 20160131/1.1 ZIMBABWE LION HUNTING & RESEARCH REPORT USFWS BdP 20160131.pdf

/57. FW: Zim Lion Hunting and Research Report - update 20160131/1.2 \_Certification\_.htm

**Pete Fick <petefick@gatorzw.com>**

---

**From:** Pete Fick <petefick@gatorzw.com>  
**Sent:** Thu Nov 23 2017 22:14:00 GMT-0700 (MST)  
**To:** <Greg\_J\_Sheehan@fws.gov>, <exsec@ios.doi.gov>  
**Subject:** FW: Zim Lion Hunting and Research Report - update 20160131  
**Attachments:** ZIMBABWE LION HUNTING & RESEARCH REPORT USFWS BdP 20160131.pdf \_Certification\_.htm

Further info you may not have seen.

---

**From:** Pete Fick [mailto:petefick@gatorzw.com]  
**Sent:** Friday, 11 March 2016 9:01 AM  
**To:** 'Joel.Mcgregor@dfat.gov.au'; Amanda.McGregor@international.gc.ca; Meyers, Rachel L (Harare) (MeyersRL@state.gov) (MeyersRL@state.gov); v@hara.diplo.de; Tom.Oppenheim@fco.gov.uk; Michele.SCHIVO@eeas.europa.eu; Severin.MELLAC@eeas.europa.eu; Corkey, Christopher T (Harare) (CorkeyCT@state.gov) (CorkeyCT@state.gov); John.Culley@fco.gov.uk; Patrice.Laquerre@international.gc.ca; Plemons, Katherine L (Harare) (PlemonsKL@state.gov) (PlemonsKL@state.gov)  
**Subject:** FW: Zim Lion Hunting and Research Report - update 20160131

Hi All

Please see attached lion report sent to USFWS (Tim Van Norman) in case you have not seen this.  
Regards Pete

# Conversation Contents

Re: Zimbabwe Lion permits that have been issued.

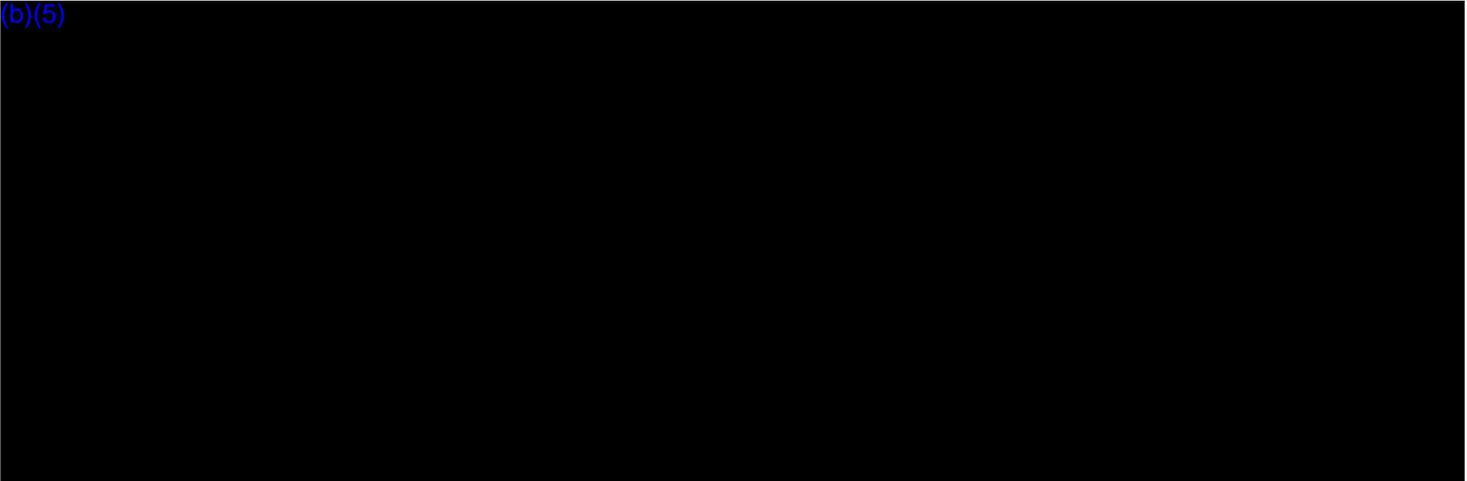
**"Hoover, Craig" <craig\_hoover@fws.gov>**

---

**From:** "Hoover, Craig" <craig\_hoover@fws.gov>  
**Sent:** Wed Nov 22 2017 11:33:27 GMT-0700 (MST)  
**To:** "Sheehan, Gregory" <greg\_j\_sheehan@fws.gov>, Gloria Bell <gloria\_bell@fws.gov>  
**CC:** "Vannorman, Tim" <tim\_vannorman@fws.gov>, "Moore, Mike" <mike\_moore@fws.gov>  
**Subject:** Re: Zimbabwe Lion permits that have been issued.

Greg/Gloria,

(b)(5)



Best,

craig

On Wed, Nov 22, 2017 at 12:11 PM, Moore, Mike <[mike\\_moore@fws.gov](mailto:mike_moore@fws.gov)> wrote:

Tim/Craig,

I still had the list of Zimbabwe/Zambia lion permits we issued and mailed out on 10/20/2017. In going through that list, we issued eighteen (18) permits for Zimbabwe lions. Here is a breakdown on information associated with these permits:

- All but three (3) of the permittee's is represented by John Jackson.
- thirteen (13) of the permits were issued for lions taken or to be taken in 2016.
- three (3) of the permits were issued for lions taken or to be taken in early to mid 2017.
- one (1) applicant indicated their trophy would be taken between August and December 2017, if they received their permit in time. The permit was issued for a trophy to be taken in 2017.
- one (1) permit was issued for a lion to be taken in 2018.

Keep in mind that the permits we issue only specify the year of take. It is not specific to the month and year of take that is typically indicated in each application.

I haven't run another SPITS report yet to see if any additional applications have been received since October, but will do so on Monday. We will need to have a conversation on how we move forward from here.

Michael M.

--

Craig Hoover  
Chief, Division of Management Authority  
International Affairs  
U.S. Fish and Wildlife Service  
5275 Leesburg Pike  
Falls Church, VA 22041-3803  
ph: 703-358-2162  
[www.fws.gov/international](http://www.fws.gov/international)

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## Conversation Contents

**Fwd: Re: Sport-hunted lion trophy enhancement findings**

**Attachments:**

/102. Fwd: Re: Sport-hunted lion trophy enhancement findings/1.1 signature9.jpg

**"John J. Jackson, III" <[cf@conservationforce.org](mailto:cf@conservationforce.org)>**

---

**From:** "John J. Jackson, III" <[cf@conservationforce.org](mailto:cf@conservationforce.org)>  
**Sent:** Mon Oct 02 2017 12:34:51 GMT-0600 (MDT)  
**To:** Gregory Sheehan <[greg\\_j\\_sheehan@fws.gov](mailto:greg_j_sheehan@fws.gov)>  
**Subject:** Fwd: Re: Sport-hunted lion trophy enhancement findings  
**Attachments:** signature9.jpg

FYI.



----- Forwarded Message -----

**Subject:** Re: Sport-hunted lion trophy enhancement findings  
**Date:** Mon, 2 Oct 2017 12:58:35 -0400  
**From:** Vannorman, Tim <[tim\\_vannorman@fws.gov](mailto:tim_vannorman@fws.gov)>  
**To:** Regina A. Lennox <[regina.lennox@conservationforce.org](mailto:regina.lennox@conservationforce.org)>  
**CC:** John J. Jackson, III <[jjj@conservationforce.org](mailto:jjj@conservationforce.org)>

Afternoon, Regina.

As you can imagine, the Department is very interested in these findings as well. It is my plan is to have a finding from all of the outstanding lion and elephant applications by the second week of November (before the AWCF in Tanzania). This may change, of course, due to additional review by the Department or other considerations, but I am hoping that will not be the case. Of course, nothing is set in stone.

Tim

On Mon, Oct 2, 2017 at 12:45 PM, Regina A. Lennox <[regina.lennox@conservationforce.org](mailto:regina.lennox@conservationforce.org)> wrote:

Dear Tim,

I hope you had a nice weekend!

We are checking in on the status of enhancement findings for the import of sport-hunted lion trophies from Zimbabwe, lion and elephant trophies from Zambia, and lion and possibly elephant trophies from Tanzania. From our August 10 meeting, we understood findings to be

in the works for Zimbabwe and Zambia, within a timeframe of approximately six weeks. We would appreciate any update to that timeframe so we can keep applicants in the loop.

Thanks very much,  
Regina

--

Timothy J. Van Norman, Chief  
Branch of Permits  
Division of Management Authority  
U.S. Fish and Wildlife Service  
(703) 358-2350

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# Conversation Contents

Powerpoint for Secretary

**Attachments:**

/107. Powerpoint for Secretary/1.1 Presentation rev 4.pptx

**Greg Sheehan** <(b) (6)>

---

**From:** Greg Sheehan <(b) (6)>  
**Sent:** Sun Nov 19 2017 22:02:58 GMT-0700 (MST)  
**To:** "Sheehan, Greg" <greg\_j\_sheehan@fws.gov>  
**Subject:** Powerpoint for Secretary  
**Attachments:** Presentation rev 4.pptx

Here is the revised powerpoint for consideration by the Secretary.

# Conversation Contents

Updated BP on lion trophies

**Attachments:**

/112. Updated BP on lion trophies/1.1 Inf memo lion and elephant hunting 8-3-17 final.docx

**"Guertin, Stephen" <stephen\_guertin@fws.gov>**

---

**From:** "Guertin, Stephen" <stephen\_guertin@fws.gov>  
**Sent:** Thu Aug 03 2017 08:57:28 GMT-0600 (MDT)  
**To:** Greg Sheehan <greg\_j\_sheehan@fws.gov>  
**CC:** Jim Kurth <Jim\_Kurth@fws.gov>, Charisa Morris <charisa\_morris@fws.gov>  
**Subject:** Updated BP on lion trophies  
**Attachments:** Inf memo lion and elephant hunting 8-3-17 final.docx

Greg

In addition to the update on the Feld Entertainment issue, the ASFWP requested an updated BP on the lion trophy issue, attached for you.

# Conversation Contents

## Second lion document

### Attachments:

/113. Second lion document/1.1 The Importance of Lion Hunting in Zimbabwe Final.docx  
/113. Second lion document/1.2 ATT00001

**John Jackson (b) (6)** >

---

**From:** John Jackson (b) (6)  
**Sent:** Sat Jul 22 2017 10:19:00 GMT-0600 (MDT)  
**To:** Greg Sheehan <Greg\_J\_Sheehan@fws.gov>  
**Subject:** Second lion document  
**Attachments:** The Importance of Lion Hunting in Zimbabwe Final.docx  
ATT00001

A second document . Our take on the issue.

**"Sheehan, Greg" <greg\_j\_sheehan@fws.gov>**

---

**From:** "Sheehan, Greg" <greg\_j\_sheehan@fws.gov>  
**Sent:** Sat Jul 22 2017 20:19:37 GMT-0600 (MDT)  
**To:** John Jackson (b) (6)  
**Subject:** Re: Second lion document

Thanks John

I had not heard about this situation with the Lion harvest but it is good to know about in case it comes up.

Thanks for sharing that detailed background information. Have a nice weekend.

Greg

On Sat, Jul 22, 2017 at 12:19 PM, John Jackson (b)(6) > wrote:  
| A second document . Our take on the issue.

--

Greg Sheehan, Acting Director  
Principle Deputy Director  
US Fish and Wildlife Service  
1849 C Street NW, Room 3358

Washington, DC 20240  
Office 202-208-4545  
Cell 202-676-7675

# Conversation Contents

## Lion Trophy Permits

### "Huggler, Matthew" <matthew\_huggler@fws.gov>

---

**From:** "Huggler, Matthew" <matthew\_huggler@fws.gov>  
**Sent:** Mon Oct 23 2017 08:41:19 GMT-0600 (MDT)  
**To:** Greg Sheehan <greg\_j\_sheehan@fws.gov>  
Barbara Wainman <barbara\_wainman@fws.gov>, Gloria Bell  
**CC:** <gloria\_bell@fws.gov>, Michael Gale <michael\_gale@fws.gov>, Charisa Morris <charisa\_morris@fws.gov>  
**Subject:** Lion Trophy Permits

Greg,

This is the information currently posted on the International program's webpage:

<https://www.fws.gov/international/permits/by-activity/sport-hunted-trophies-lions.html>

We have shared this link and information with Safari Club and other interested stakeholders, as well as used it to respond to incoming on social media.

Does this fit what you wanted in regard to a "news release" per our conversation this morning?

I am concerned that if we generate a news release at this point for the FWS homepage we will just draw criticism and be accused of being sneaky since we are already approving the permits.

Please advise. Thanks,

- Matt

---

Matthew C. Huggler  
Deputy Assistant Director - External Affairs  
U.S. Fish and Wildlife Service  
5275 Leesburg Pike, MS: EA  
Falls Church, VA 22041-3803  
(703) 358-2243 (office)  
(202) 460-8402 (cell)

### Greg Sheehan <greg\_j\_sheehan@fws.gov>

---

**From:** Greg Sheehan <greg\_j\_sheehan@fws.gov>  
**Sent:** Mon Oct 23 2017 09:00:23 GMT-0600 (MDT)

**To:** "Huggler, Matthew" <matthew\_huggler@fws.gov>  
Barbara Wainman <barbara\_wainman@fws.gov>, Gloria Bell  
<gloria\_bell@fws.gov>, Michael Gale <michael\_gale@fws.gov>,  
**CC:** Charisa Morris <charisa\_morris@fws.gov>  
**Subject:** Re: Lion Trophy Permits

That would generally work but I believe we need the date ranges of the approved plans in a fourth column of that matrix. Then hunters could better plan ahead out into the future with the realization that some of these reviews expire at some point.

Thanks  
Greg

Greg Sheehan  
Principal Deputy Director  
US Fish and Wildlife Service  
202-208-4545 office  
202-676-7675 cell

On Oct 23, 2017, at 10:41 AM, Huggler, Matthew <[matthew\\_huggler@fws.gov](mailto:matthew_huggler@fws.gov)> wrote:

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<https://www.fws.gov/international/permits/by-activity/sport-hunted-trophies-lions.html>

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Does this fit what you wanted in regard to a "news release" per our conversation this morning?

I am concerned that if we generate a news release at this point for the FWS homepage we will just draw criticism and be accused of being sneaky since we are already approving the permits.

Please advise. Thanks,

- Matt

---

Matthew C. Huggler  
Deputy Assistant Director - External Affairs  
U.S. Fish and Wildlife Service  
5275 Leesburg Pike, MS: EA  
Falls Church, VA 22041-3803  
(703) 358-2243 (office)  
(202) 460-8402 (cell)

---

**Matthew Huggler <[matthew\\_huggler@fws.gov](mailto:matthew_huggler@fws.gov)>**

**From:** Matthew Huggler <matthew\_huggler@fws.gov>  
**Sent:** Mon Oct 23 2017 09:01:54 GMT-0600 (MDT)  
**To:** Greg Sheehan <greg\_j\_sheehan@fws.gov>  
Barbara Wainman <barbara\_wainman@fws.gov>, Gloria Bell  
**CC:** <gloria\_bell@fws.gov>, Michael Gale <michael\_gale@fws.gov>, Charisa Morris <charisa\_morris@fws.gov>  
**Subject:** Re: Lion Trophy Permits

Sounds good. We will work with International to make the adjustment.

- Matt

On Oct 23, 2017, at 11:00 AM, Greg Sheehan <[greg\\_j\\_sheehan@fws.gov](mailto:greg_j_sheehan@fws.gov)> wrote:

That would generally work but I believe we need the date ranges of the approved plans in a fourth column of that matrix. Then hunters could better plan ahead out into the future with the realization that some of these reviews expire at some point.

Thanks  
Greg

Greg Sheehan  
Principal Deputy Director  
US Fish and Wildlife Service  
202-208-4545 office  
202-676-7675 cell

On Oct 23, 2017, at 10:41 AM, Huggler, Matthew <[matthew\\_huggler@fws.gov](mailto:matthew_huggler@fws.gov)> wrote:

Greg,

This is the information currently posted on the International program's webpage:

<https://www.fws.gov/international/permits/by-activity/sport-hunted-trophies-lions.html>

We have shared this link and information with Safari Club and other interested stakeholders, as well as used it to respond to incoming on social media.

Does this fit what you wanted in regard to a "news release" per our conversation this morning?

I am concerned that if we generate a news release at this point for the FWS homepage we will just draw criticism and be accused of being sneaky since we are already approving the permits.

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5275 Leesburg Pike, MS: EA  
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(202) 460-8402 (cell)

## Conversation Contents

**Fwd: Re: Sport-hunted lion trophy enhancement findings**

**Attachments:**

/128. Fwd: Re: Sport-hunted lion trophy enhancement findings/1.1 signature9.jpg

**"John J. Jackson, III" <[cf@conservationforce.org](mailto:cf@conservationforce.org)>**

---

**From:** "John J. Jackson, III" <[cf@conservationforce.org](mailto:cf@conservationforce.org)>  
**Sent:** Mon Oct 02 2017 12:34:51 GMT-0600 (MDT)  
**To:** Gregory Sheehan <[greg\\_j\\_sheehan@fws.gov](mailto:greg_j_sheehan@fws.gov)>  
**Subject:** Fwd: Re: Sport-hunted lion trophy enhancement findings  
**Attachments:** signature9.jpg

FYI.



----- Forwarded Message -----

**Subject:** Re: Sport-hunted lion trophy enhancement findings  
**Date:** Mon, 2 Oct 2017 12:58:35 -0400  
**From:** Vannorman, Tim <[tim\\_vannorman@fws.gov](mailto:tim_vannorman@fws.gov)>  
**To:** Regina A. Lennox <[regina.lennox@conservationforce.org](mailto:regina.lennox@conservationforce.org)>  
**CC:** John J. Jackson, III <[jjj@conservationforce.org](mailto:jjj@conservationforce.org)>

Afternoon, Regina.

As you can imagine, the Department is very interested in these findings as well. It is my plan is to have a finding from all of the outstanding lion and elephant applications by the second week of November (before the AWCF in Tanzania). This may change, of course, due to additional review by the Department or other considerations, but I am hoping that will not be the case. Of course, nothing is set in stone.

Tim

On Mon, Oct 2, 2017 at 12:45 PM, Regina A. Lennox <[regina.lennox@conservationforce.org](mailto:regina.lennox@conservationforce.org)> wrote:

Dear Tim,

I hope you had a nice weekend!

We are checking in on the status of enhancement findings for the import of sport-hunted lion trophies from Zimbabwe, lion and elephant trophies from Zambia, and lion and possibly elephant trophies from Tanzania. From our August 10 meeting, we understood findings to be

in the works for Zimbabwe and Zambia, within a timeframe of approximately six weeks. We would appreciate any update to that timeframe so we can keep applicants in the loop.

Thanks very much,  
Regina

--

Timothy J. Van Norman, Chief  
Branch of Permits  
Division of Management Authority  
U.S. Fish and Wildlife Service  
(703) 358-2350

**[Sign up](#) for our e-newsletter to learn how we're working around the globe to protect species and their habitats!**



# Conversation Contents

4d

**Attachments:**

/155. 4d/1.1 4D rule and Abstract Lions and Elephants.docx

**"Sheehan, Greg" <greg\_j\_sheehan@fws.gov>**

---

**From:** "Sheehan, Greg" <greg\_j\_sheehan@fws.gov>  
**Sent:** Tue Oct 24 2017 13:26:26 GMT-0600 (MDT)  
**To:** Charisa Morris <charisa\_morris@fws.gov>  
**Subject:** 4d  
**Attachments:** 4D rule and Abstract Lions and Elephants.docx

Please see attached.

--

Greg Sheehan  
Principal Deputy Director  
US Fish and Wildlife Service  
1849 C Street NW, Room 3358  
Washington, DC 20240  
Office 202-208-4545  
Cell 202-676-7675

# Conversation Contents

## 4(d) rules

### Attachments:

/158. 4(d) rules/1.1 4d rule revision-African elephant\_6 June 2016.pdf  
/158. 4(d) rules/1.2 Listing two lion subspecies\_final rule\_23 Dec 2015.pdf

**"Bell, Gloria" <gloria\_bell@fws.gov>**

---

**From:** "Bell, Gloria" <gloria\_bell@fws.gov>  
**Sent:** Mon Oct 23 2017 14:12:25 GMT-0600 (MDT)  
**To:** Greg Sheehan <greg\_j\_sheehan@fws.gov>  
**Subject:** 4(d) rules  
**Attachments:** 4d rule revision-African elephant\_6 June 2016.pdf Listing two lion subspecies\_final rule\_23 Dec 2015.pdf

Greg,

Per your request, the 4(d) rules for African elephant and two lion subspecies are attached below. The 4(d) rule for lion was done concurrently with the listing.

Gloria

Gloria Bell | Acting Assistant Director for International Affairs | U.S. Fish & Wildlife Service  
5275 Leesburg Pike, MS: IA, Falls Church, Virginia, 22041-3803, USA | 703-358-1767  
[www.fws.gov/international](http://www.fws.gov/international) | [Sign up](#) for our e-newsletter to learn how we're working around the globe to protect species and their habitats!



Learn more about [Diversity Change Agents](#).

**Greg Sheehan <greg\_j\_sheehan@fws.gov>**

---

**From:** Greg Sheehan <greg\_j\_sheehan@fws.gov>  
**Sent:** Mon Oct 23 2017 22:42:32 GMT-0600 (MDT)  
**To:** "Bell, Gloria" <gloria\_bell@fws.gov>  
**Subject:** Re: 4(d) rules

Thanks Gloria. I read those and will have language after walking over to ASFWP in the morning. Thanks Greg Greg Sheehan Principal Deputy Director US Fish and Wildlife Service 202-208-4545 office 202-676-7675 cell > On Oct 23, 2017, at 4:12 PM, Bell, Gloria <gloria\_bell@fws.gov> wrote: > > Greg, > > Per your request, the 4(d) rules for African elephant and two lion > subspecies are attached below. The 4(d) rule for lion was done > concurrently with the listing. > > Gloria > > > Gloria Bell | Acting Assistant Director for International Affairs |

> U.S. Fish & Wildlife Service > 5275 Leesburg Pike, MS: IA, Falls Church, Virginia, 22041-3803, USA | > 703-358-1767 > [www.fws.gov/international](http://www.fws.gov/international) | Sign up > > for > our e-newsletter to learn how we're working around the globe to protect > species and their habitats! > > [image: Stamp out extinction with the > Save Vanishing Species Stamp] > > \*Learn more about Diversity Change Agents > .\* > <4d rule revision-African elephant\_6 June 2016.pdf> >

# Conversation Contents

Updated BP on lion trophies

**Attachments:**

/172. Updated BP on lion trophies/1.1 Inf memo lion and elephant hunting 8-3-17 final.docx

**"Guertin, Stephen" <stephen\_guertin@fws.gov>**

---

**From:** "Guertin, Stephen" <stephen\_guertin@fws.gov>  
**Sent:** Thu Aug 03 2017 08:57:28 GMT-0600 (MDT)  
**To:** Greg Sheehan <greg\_j\_sheehan@fws.gov>  
**CC:** Jim Kurth <Jim\_Kurth@fws.gov>, Charisa Morris <charisa\_morris@fws.gov>  
**Subject:** Updated BP on lion trophies  
**Attachments:** Inf memo lion and elephant hunting 8-3-17 final.docx

Greg

In addition to the update on the Feld Entertainment issue, the ASFWP requested an updated BP on the lion trophy issue, attached for you.

# Conversation Contents

Add. Items for Weekly Report 2017-08-09

**"Gale, Michael" <michael\_gale@fws.gov>**

---

**From:** "Gale, Michael" <michael\_gale@fws.gov>  
**Sent:** Tue Aug 08 2017 09:12:11 GMT-0600 (MDT)  
**To:** "Foster, Maureen" <maureen\_foster@ios.doi.gov>  
Casey Hammond <casey\_hammond@ios.doi.gov>, Greg Sheehan <greg\_j\_sheehan@fws.gov>, Jim Kurth <jim\_kurth@fws.gov>, Stephen Guertin <stephen\_guertin@fws.gov>, Charisa Morris <charisa\_morris@fws.gov>  
**CC:**  
**Subject:** Add. Items for Weekly Report 2017-08-09

Hello Maureen,

Per the request of our International Affairs and External Affairs programs, I've been asked to add two last minute additions to the Weekly Report for August 9, 2017.

Charisa asked that I highlight these last minute additions in a different color (orange) so that you can spot them right away, and I've [added them to the Google document](#) as well as pasted here for your immediate reference:

## Week Ahead Announcement and Actions

In mid-August, FWS will announce that after reviewing updated information from South Africa, it will again authorize imports of wild and wild-managed lions from South Africa taken during 2017-2019. In 2016, FWS listed the lion in eastern and southern Africa as threatened under the ESA. FWS contacted each of the countries within this region that have conducted trophy lion hunts in the past few years to obtain information on the country's lion population, management of lions, and how sport-hunting has contributed to survival of the species. FWS then authorized the import of wild and wild managed lion sport-hunted trophies in 2016. No outreach is planned because the status is unchanged from 2016.

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At the end of August, FWS plans to publish in the *Federal Register* a change to the permitting status for imports of African elephant trophies from Zimbabwe. In 2014 and 2015, FWS was unable to determine that the hunting programs and subsequent imports of African elephant trophies from Zimbabwe met criteria under ESA regulations, so FWS could not authorize the issuance of import permits. After receiving information from Zimbabwe on a number of substantial improvements to their management program and elephant conservation efforts, FWS has determined that taking of African elephant trophy animals in Zimbabwe on or after January 21, 2016 (the date that Zimbabwe's new management plan was officially adopted) through 2017 would enhance the survival of African elephants, and import permits can be issued for these trophies. Planned outreach includes a news release, comprehensive FAQs and social

media.

Please let us know if you have any questions on this new material, and please accept our apologies for the last minute addition.

cheers,

Michael

--

Michael Gale

Deputy Chief of Staff (Acting), Director's Office  
U.S. Fish and Wildlife Service

202.208.4923 (office)  
571.982.2158 (cell)

**"Foster, Maureen" <maureen\_foster@ios.doi.gov>**

---

**From:** "Foster, Maureen" <maureen\_foster@ios.doi.gov>  
**Sent:** Tue Aug 08 2017 15:35:57 GMT-0600 (MDT)  
**To:** "Gale, Michael" <michael\_gale@fws.gov>  
Casey Hammond <casey\_hammond@ios.doi.gov>, Greg Sheehan <greg\_j\_sheehan@fws.gov>, Jim Kurth <jim\_kurth@fws.gov>, Stephen Guertin <stephen\_guertin@fws.gov>, Charisa Morris <charisa\_morris@fws.gov>  
**CC:**  
**Subject:** Re: Add. Items for Weekly Report 2017-08-09

Thanks much. No worries -- our office is reviewing the report now.

---

Maureen D. Foster  
Chief of Staff  
Office of the Assistant Secretary  
for Fish and Wildlife and Parks  
1849 C Street, NW, Room 3161  
Washington, DC 20240

202.208.5970 (desk)  
202.208.4416 (main)

[Maureen\\_Foster@ios.doi.gov](mailto:Maureen_Foster@ios.doi.gov)

On Tue, Aug 8, 2017 at 11:12 AM, Gale, Michael <[michael\\_gale@fws.gov](mailto:michael_gale@fws.gov)> wrote:

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cheers,

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Michael Gale

Deputy Chief of Staff (Acting), Director's Office  
U.S. Fish and Wildlife Service

202.208.4923 (office)  
571.982.2158 (cell)

## Conversation Contents

**Fwd: Re: Sport-hunted lion trophy enhancement findings**

**Attachments:**

/176. Fwd: Re: Sport-hunted lion trophy enhancement findings/1.1 signature9.jpg

**"John J. Jackson, III" <[cf@conservationforce.org](mailto:cf@conservationforce.org)>**

---

**From:** "John J. Jackson, III" <[cf@conservationforce.org](mailto:cf@conservationforce.org)>  
**Sent:** Mon Oct 02 2017 12:34:51 GMT-0600 (MDT)  
**To:** Gregory Sheehan <[greg\\_j\\_sheehan@fws.gov](mailto:greg_j_sheehan@fws.gov)>  
**Subject:** Fwd: Re: Sport-hunted lion trophy enhancement findings  
**Attachments:** signature9.jpg

FYI.



----- Forwarded Message -----

**Subject:** Re: Sport-hunted lion trophy enhancement findings  
**Date:** Mon, 2 Oct 2017 12:58:35 -0400  
**From:** Vannorman, Tim <[tim\\_vannorman@fws.gov](mailto:tim_vannorman@fws.gov)>  
**To:** Regina A. Lennox <[regina.lennox@conservationforce.org](mailto:regina.lennox@conservationforce.org)>  
**CC:** John J. Jackson, III <[jjj@conservationforce.org](mailto:jjj@conservationforce.org)>

Afternoon, Regina.

As you can imagine, the Department is very interested in these findings as well. It is my plan is to have a finding from all of the outstanding lion and elephant applications by the second week of November (before the AWCF in Tanzania). This may change, of course, due to additional review by the Department or other considerations, but I am hoping that will not be the case. Of course, nothing is set in stone.

Tim

On Mon, Oct 2, 2017 at 12:45 PM, Regina A. Lennox <[regina.lennox@conservationforce.org](mailto:regina.lennox@conservationforce.org)> wrote:

Dear Tim,

I hope you had a nice weekend!

We are checking in on the status of enhancement findings for the import of sport-hunted lion trophies from Zimbabwe, lion and elephant trophies from Zambia, and lion and possibly elephant trophies from Tanzania. From our August 10 meeting, we understood findings to be

in the works for Zimbabwe and Zambia, within a timeframe of approximately six weeks. We would appreciate any update to that timeframe so we can keep applicants in the loop.

Thanks very much,  
Regina

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Timothy J. Van Norman, Chief  
Branch of Permits  
Division of Management Authority  
U.S. Fish and Wildlife Service  
(703) 358-2350

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# Conversation Contents

## Second lion document

### Attachments:

/179. Second lion document/1.1 The Importance of Lion Hunting in Zimbabwe Final.docx

/179. Second lion document/1.2 ATT00001

## John Jackson <jjjiii@att.net>

---

**From:** John Jackson (b)(6) >  
**Sent:** Sat Jul 22 2017 10:19:00 GMT-0600 (MDT)  
**To:** Greg Sheehan <Greg\_J\_Sheehan@fws.gov>  
**Subject:** Second lion document  
**Attachments:** The Importance of Lion Hunting in Zimbabwe Final.docx  
ATT00001

A second document . Our take on the issue.

## "Sheehan, Greg" <greg\_j\_sheehan@fws.gov>

---

**From:** "Sheehan, Greg" <greg\_j\_sheehan@fws.gov>  
**Sent:** Sat Jul 22 2017 20:19:37 GMT-0600 (MDT)  
**To:** John Jackson (b)(6) >  
**Subject:** Re: Second lion document

Thanks John

I had not heard about this situation with the Lion harvest but it is good to know about in case it comes up.

Thanks for sharing that detailed background information. Have a nice weekend.

Greg

On Sat, Jul 22, 2017 at 12:19 PM, John Jackson (b)(6) > wrote:  
| A second document . Our take on the issue.

--  
Greg Sheehan, Acting Director  
Principle Deputy Director  
US Fish and Wildlife Service  
1849 C Street NW, Room 3358

Washington, DC 20240  
Office 202-208-4545  
Cell 202-676-7675

# Conversation Contents

Lion Fact vs fiction

**Attachments:**

/180. Lion Fact vs fiction/1.1 ZPHGA Statement.pdf  
/180. Lion Fact vs fiction/1.2 ATT00001

**John Jackson <jjjiii@att.net>**

---

**From:** John Jackson (b)(6) >  
**Sent:** Sat Jul 22 2017 10:09:50 GMT-0600 (MDT)  
**To:** Greg Sheenan <Greg\_J\_Sheehan@fws.gov>  
**Subject:** Lion Fact vs fiction  
**Attachments:** ZPHGA Statement.pdf ATT00001

Greg,  
Like with Cecil, the media has it wrong again but likes it that way. Thought you might want to know the truth as soon as possible. Will send you a bit more shortly and will try to keep it short.

Best,  
John J. Jackson III,  
Conservation Force  
[504 453 2754](tel:5044532754)

# Conversation Contents

Add. Items for Weekly Report 2017-08-09

**"Gale, Michael" <michael\_gale@fws.gov>**

---

**From:** "Gale, Michael" <michael\_gale@fws.gov>  
**Sent:** Tue Aug 08 2017 09:12:11 GMT-0600 (MDT)  
**To:** "Foster, Maureen" <maureen\_foster@ios.doi.gov>  
Casey Hammond <casey\_hammond@ios.doi.gov>, Greg Sheehan <greg\_j\_sheehan@fws.gov>, Jim Kurth <jim\_kurth@fws.gov>, Stephen Guertin <stephen\_guertin@fws.gov>, Charisa Morris <charisa\_morris@fws.gov>  
**CC:**  
**Subject:** Add. Items for Weekly Report 2017-08-09

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Michael

--

Michael Gale

Deputy Chief of Staff (Acting), Director's Office  
U.S. Fish and Wildlife Service

202.208.4923 (office)  
571.982.2158 (cell)

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Casey Hammond <casey\_hammond@ios.doi.gov>, Greg Sheehan <greg\_j\_sheehan@fws.gov>, Jim Kurth <jim\_kurth@fws.gov>, Stephen Guertin <stephen\_guertin@fws.gov>, Charisa Morris <charisa\_morris@fws.gov>  
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**Subject:** Re: Add. Items for Weekly Report 2017-08-09

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Maureen D. Foster  
Chief of Staff  
Office of the Assistant Secretary  
for Fish and Wildlife and Parks  
1849 C Street, NW, Room 3161  
Washington, DC 20240

202.208.5970 (desk)  
202.208.4416 (main)

[Maureen\\_Foster@ios.doi.gov](mailto:Maureen_Foster@ios.doi.gov)

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Michael Gale

Deputy Chief of Staff (Acting), Director's Office  
U.S. Fish and Wildlife Service

202.208.4923 (office)  
571.982.2158 (cell)

# Conversation Contents

**Fwd: AWCF**

**Attachments:**

/23. Fwd: AWCF/1.1 AWCF 2017\_Draft Agenda\_18October2017.docx

/23. Fwd: AWCF/3.1 AWCF 2017\_Draft Agenda\_18October2017.docx

/23. Fwd: AWCF/4.1 AWCF 2017\_Draft Agenda\_18October2017.docx

**Todd Willens <[todd\\_willens@ios.doi.gov](mailto:todd_willens@ios.doi.gov)>**

---

**From:** Todd Willens <[todd\\_willens@ios.doi.gov](mailto:todd_willens@ios.doi.gov)>  
**Sent:** Wed Nov 01 2017 09:10:38 GMT-0600 (MDT)  
**To:** douglas\_domenech@ios.doi.gov, scott\_cameron@ios.doi.gov  
**CC:** Downey Magallanes <[downey\\_magallanes@ios.doi.gov](mailto:downey_magallanes@ios.doi.gov)>, lori\_mashburn@ios.doi.gov, greg\_j\_sheehan@fws.gov, jason\_larrabee@ios.doi.gov  
**Subject:** Fwd: AWCF  
**Attachments:** AWCF 2017\_Draft Agenda\_18October2017.docx

Scott and Doug,

Can you please have the appropriate person in Int'l Affairs assist FWS with Greg Sheehan's paperwork, official passport and travel to attend this meeting for the Department. He is being approved to attend.

Thank you.

Todd Willens  
Assistant Deputy Secretary  
U.S. Department of the Interior  
1849 C Street, NW - MIB Room 6116  
Washington, DC 20240

Begin forwarded message:

**From:** John Green <[jgreen@crshq.com](mailto:jgreen@crshq.com)>  
**To:** Todd Willens <[todd\\_willens@ios.doi.gov](mailto:todd_willens@ios.doi.gov)>  
**Subject:** AWCF

Todd,

Thanks for the conversation and offer of assistance. As the Secretary stated in a meeting in July, DOI having a presence at important African wildlife conferences is critical and SCI couldn't agree more.

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Suite 800  
Washington, DC 20002  
202 559-0170

**Scott Cameron <scott\_cameron@ios.doi.gov>**

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**From:** Scott Cameron <scott\_cameron@ios.doi.gov>  
**Sent:** Wed Nov 01 2017 09:24:17 GMT-0600 (MDT)  
**To:** Todd Willens <todd\_willens@ios.doi.gov>, karen\_senhadji@ios.doi.gov  
"douglas\_domenech@ios.doi.gov"  
<douglas\_domenech@ios.doi.gov>, Downey Magallanes  
**CC:** <downey\_magallanes@ios.doi.gov>, "lori\_mashburn@ios.doi.gov" <lori\_mashburn@ios.doi.gov>, "greg\_j\_sheehan@fws.gov" <greg\_j\_sheehan@fws.gov>, "jason\_larrabee@ios.doi.gov" <jason\_larrabee@ios.doi.gov>  
**Subject:** Re: AWCF

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Karen

\*\*\*\*\*  
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**Attachments:**

/128. Fwd: AWCF/1.1 AWCF 2017\_Draft Agenda\_18October2017.docx

/128. Fwd: AWCF/3.1 AWCF 2017\_Draft Agenda\_18October2017.docx

/128. Fwd: AWCF/4.1 AWCF 2017\_Draft Agenda\_18October2017.docx

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## LAST WEEK'S Weekly FWS Secretarial Report + bonus

### Attachments:

- /8. LAST WEEK'S Weekly FWS Secretarial Report + bonus/1.1 FWS Weekly Report 2017-08-23.docx
- /8. LAST WEEK'S Weekly FWS Secretarial Report + bonus/1.2 FishBites 8.21.17.docx

**"Morris, Charisa" <charisa\_morris@fws.gov>**

---

**From:** "Morris, Charisa" <charisa\_morris@fws.gov>  
**Sent:** Mon Aug 28 2017 09:15:39 GMT-0600 (MDT)  
**To:** "FWS Directorate & Deputies" <fwsdirectanddep@fws.gov>  
**Subject:** LAST WEEK'S Weekly FWS Secretarial Report + bonus  
**Attachments:** FWS Weekly Report 2017-08-23.docx FishBites 8.21.17.docx

Good morning!

Attached is last week's Weekly FWS Secretarial Report (usually distributed on Friday); apologies for the late share! As a bonus, I'm also attaching last week's "Fish Bites" FYI, which are "good news" bullets we share weekly with the Department.

Have an extraordinary day,  
Charisa

--

[Charisa.Morris@fws.gov](mailto:Charisa.Morris@fws.gov) | Chief of Staff, Office of the Director | U.S. Fish & Wildlife Service | 1849 C Street NW, Room 3348 | Washington, DC 20240 | (202) 208-3843 | For urgent matters, please dial cell: 301-875-8937

**WEEKLY REPORT**  
**DEPARTMENT OF THE INTERIOR U.S. Fish and Wildlife Service**  
**August 23, 2017**

Nonresponsive Records [Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

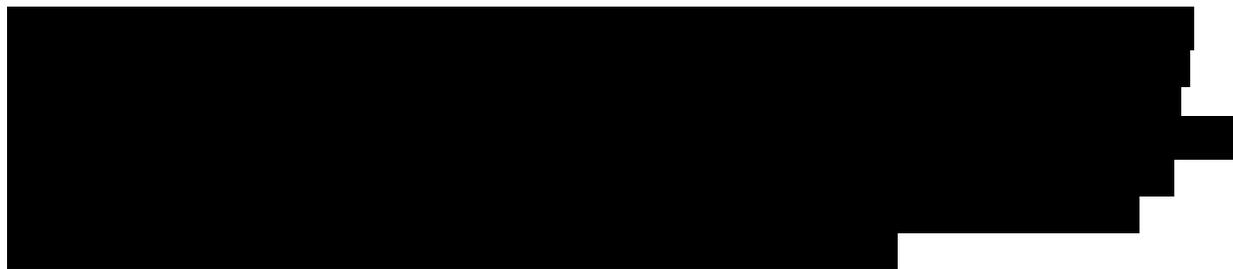
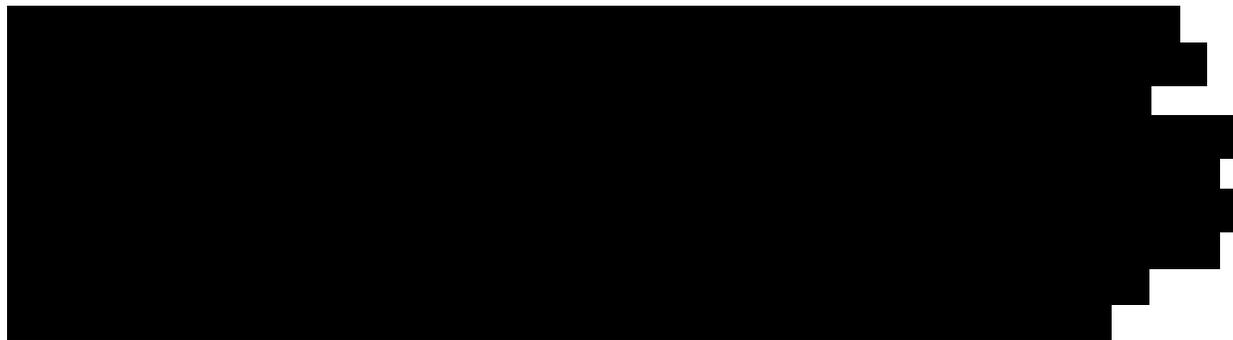
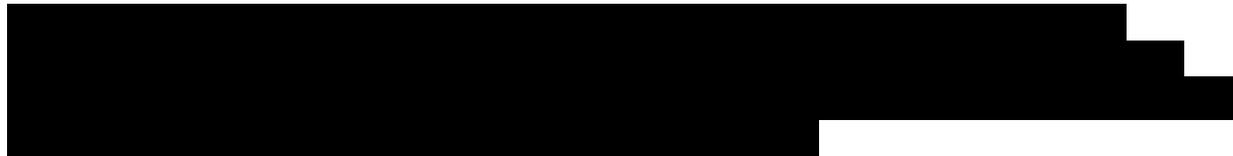
[Redacted]

[Redacted]

In late August, FWS will announce that after reviewing updated information, it will again authorize imports of wild and wild-managed lions from South Africa taken during 2017-2019. In

2016, FWS listed the lion in eastern and southern Africa as threatened under the ESA. FWS contacted each of the countries within this region that have conducted trophy lion hunts in the past few years to obtain information on the country's lion population, management of lions, and how sport hunting has contributed to survival of the species. FWS then authorized the import of wild and wild managed lion sport-hunted trophies in 2016. Outreach in the form of a blog is planned.

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[Redacted]

Nonresponsive Records

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

# Conversation Contents

## FWS Weekly Secretarial Report

### Attachments:

/11. FWS Weekly Secretarial Report/1.1 FWS Weekly Report 2017-08-09.docx

**"Morris, Charisa" <charisa\_morris@fws.gov>**

---

**From:** "Morris, Charisa" <charisa\_morris@fws.gov>  
**Sent:** Fri Aug 11 2017 16:15:33 GMT-0600 (MDT)  
**To:** "FWS Directorate & Deputies" <fwsdirectanddep@fws.gov>  
**Subject:** FWS Weekly Secretarial Report  
**Attachments:** FWS Weekly Report 2017-08-09.docx

Good afternoon!

Please see the FWS Weekly Secretarial Report, attached.

Have an extraordinary weekend,  
Charisa

--

[Charisa.Morris@fws.gov](mailto:Charisa.Morris@fws.gov) | Chief of Staff, Office of the Director | U.S. Fish & Wildlife Service | 1849  
C Street NW, Room 3348 | Washington, DC 20240 | (202) 208-3843 | For urgent matters, please dial cell: 301-875-  
8937

**WEEKLY REPORT**  
**DEPARTMENT OF THE INTERIOR U.S. Fish and Wildlife Service**  
**August 9**

Nonresponsive Records [Redacted]

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Nonresponsive Records

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In mid-August, FWS will announce that after reviewing updated information from South Africa, it will again authorize imports of wild and wild-managed lions from South Africa taken during 2017-2019. In 2016, FWS listed the lion in eastern and southern Africa as threatened under the ESA. FWS contacted each of the countries within this region that have conducted trophy lion hunts in the past few years to obtain information on the country's lion population, management of lions, and how sport-hunting has contributed to survival of the species. FWS then authorized the import of wild and wild managed lion sport-hunted trophies in 2016. No outreach is planned because the status is unchanged from 2016.

Nonresponsive  
Records

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[Redacted]

[Redacted]

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[Redacted text block]

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# Conversation Contents

**drafts for Secretary briefing**

**Attachments:**

/12. drafts for Secretary briefing/1.1 Inf memo lion and elephant hunting 7-10-17 rev.docx  
/12. drafts for Secretary briefing/1.2 Lion and Elephant ESA Listings 1-pager.docx  
/12. drafts for Secretary briefing/7.1 Lion and Elephant ESA Listings 1-pager public.docx  
/12. drafts for Secretary briefing/7.2 Inf memo lion and elephant hunting 7-10-17 rev2.docx

**"Hoover, Craig" <craig\_hoover@fws.gov>**

---

**From:** "Hoover, Craig" <craig\_hoover@fws.gov>  
**Sent:** Mon Jul 10 2017 14:25:44 GMT-0600 (MDT)  
**To:** Gregory Sheehan <gregory\_sheehan@fws.gov>, "Sheehan, Gregory" <greg\_j\_sheehan@fws.gov>  
**CC:** Charisa Morris <charisa\_morris@fws.gov>, Tim Van Norman <tim\_vannorman@fws.gov>  
**Subject:** drafts for Secretary briefing  
**Attachments:** Inf memo lion and elephant hunting 7-10-17 rev.docx Lion and Elephant ESA Listings 1-pager.docx

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Best,

Craig

--

Craig Hoover  
Chief, Division of Management Authority  
International Affairs  
U.S. Fish and Wildlife Service  
5275 Leesburg Pike  
Falls Church, VA 22041-3803  
ph: 703-358-2162  
[www.fws.gov/international](http://www.fws.gov/international)

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## Greg Sheehan <greg\_j\_sheehan@fws.gov>

---

**From:** Greg Sheehan <greg\_j\_sheehan@fws.gov>  
**Sent:** Mon Jul 10 2017 18:51:55 GMT-0600 (MDT)  
**To:** "Hoover, Craig" <craig\_hoover@fws.gov>  
**CC:** Gregory Sheehan <gregory\_sheehan@fws.gov>, Charisa Morris <charisa\_morris@fws.gov>, Tim Van Norman <tim\_vannorman@fws.gov>  
**Subject:** Re: drafts for Secretary briefing

Craig,

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I will literally arrive at the Secretary's office right at 3 pm if all goes well as I land back at Dulles Airport at 1:40 pm.

Please plan to take an explanatory lead on these after I do a brief introduction.

Thanks  
Greg

Greg Sheehan, Acting Director  
Principal Deputy Director  
US Fish and Wildlife Service  
202-208-4545 office  
202-676-7675 cell

On Jul 10, 2017, at 2:26 PM, Hoover, Craig <[craig\\_hoover@fws.gov](mailto:craig_hoover@fws.gov)> wrote:

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<Inf memo lion and elephant hunting 7-10-17 rev.docx>

<Lion and Elephant ESA Listings 1-pager.docx>

**Craig Hoover <craig\_hoover@fws.gov>**

---

**From:** Craig Hoover <craig\_hoover@fws.gov>  
**Sent:** Mon Jul 10 2017 19:00:56 GMT-0600 (MDT)  
**To:** Greg Sheehan <greg\_j\_sheehan@fws.gov>  
Gregory Sheehan <gregory\_sheehan@fws.gov>, Charisa Morris  
**CC:** <charisa\_morris@fws.gov>, Tim Van Norman  
<tim\_vannorman@fws.gov>  
**Subject:** Re: drafts for Secretary briefing

Thanks Greg. Safe travels. We will work together to have it all set. See you there.

Craig

Sent from my iPhone

On Jul 10, 2017, at 8:51 PM, Greg Sheehan <[greg\\_j\\_sheehan@fws.gov](mailto:greg_j_sheehan@fws.gov)> wrote:

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Craig

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<Inf memo lion and elephant hunting 7-10-17 rev.docx>

<Lion and Elephant ESA Listings 1-pager.docx>

**Gregory Sheehan <[gregory\\_sheehan@fws.gov](mailto:gregory_sheehan@fws.gov)>**

---

**From:** Gregory Sheehan <[gregory\\_sheehan@fws.gov](mailto:gregory_sheehan@fws.gov)>  
**Sent:** Tue Jul 11 2017 08:05:36 GMT-0600 (MDT)  
**To:** Greg Sheehan <[greg\\_j\\_sheehan@fws.gov](mailto:greg_j_sheehan@fws.gov)>  
"Hoover, Craig" <[craig\\_hoover@fws.gov](mailto:craig_hoover@fws.gov)>, Charisa Morris  
<[charisa\\_morris@fws.gov](mailto:charisa_morris@fws.gov)>, Tim Van Norman  
<[tim\\_vannorman@fws.gov](mailto:tim_vannorman@fws.gov)>  
**CC:**  
**Subject:** Re: drafts for Secretary briefing

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<Lion and Elephant ESA Listings 1-pager.docx>

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**From:** "Hoover, Craig" <[craig\\_hoover@fws.gov](mailto:craig_hoover@fws.gov)>  
**Sent:** Tue Jul 11 2017 08:12:49 GMT-0600 (MDT)  
**To:** Gregory Sheehan <[gregory\\_sheehan@fws.gov](mailto:gregory_sheehan@fws.gov)>  
**CC:** Greg Sheehan <[greg\\_j\\_sheehan@fws.gov](mailto:greg_j_sheehan@fws.gov)>, Charisa Morris <[charisa\\_morris@fws.gov](mailto:charisa_morris@fws.gov)>  
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<Inf memo lion and elephant hunting 7-10-17 rev.docx>

<Lion and Elephant ESA Listings 1-pager.docx>

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**"Morris, Charisa" <[charisa\\_morris@fws.gov](mailto:charisa_morris@fws.gov)>**

---

**From:** "Morris, Charisa" <[charisa\\_morris@fws.gov](mailto:charisa_morris@fws.gov)>  
**Sent:** Tue Jul 11 2017 09:17:00 GMT-0600 (MDT)  
**To:** "Hoover, Craig" <[craig\\_hoover@fws.gov](mailto:craig_hoover@fws.gov)>  
**CC:** Gregory Sheehan <[gregory\\_sheehan@fws.gov](mailto:gregory_sheehan@fws.gov)>, Greg Sheehan <[greg\\_j\\_sheehan@fws.gov](mailto:greg_j_sheehan@fws.gov)>  
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<Inf memo lion and elephant hunting 7-10-17 rev.docx>

<Lion and Elephant ESA Listings 1-pager.docx>

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[Charisa.Morris@fws.gov](mailto:Charisa.Morris@fws.gov) | Chief of Staff, Office of the Director | U.S. Fish & Wildlife Service | 1849 C Street NW, Room 3348 | Washington, DC 20240 | (202) 208-3843 | For urgent matters, please dial cell: 301-875-8937

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**Sent:** Tue Jul 11 2017 09:41:09 GMT-0600 (MDT)  
**To:** "Morris, Charisa" <charisa\_morris@fws.gov>  
**CC:** Gregory Sheehan <gregory\_sheehan@fws.gov>, Greg Sheehan <greg\_j\_sheehan@fws.gov>  
**Subject:** Re: drafts for Secretary briefing  
**Attachments:** Lion and Elephant ESA Listings 1-pager public.docx Inf memo lion and elephant hunting 7-10-17 rev2.docx

Charisa,

Here's a one-pager that I would feel comfortable sharing with external stakeholders as well. Also, I am reattaching the briefing paper (which is still internal use only) with a few edits. There was reference to attachments that we are not providing in the previous version, which may be confusing. Addressed in this version.

craig

On Tue, Jul 11, 2017 at 11:17 AM, Morris, Charisa <[charisa\\_morris@fws.gov](mailto:charisa_morris@fws.gov)> wrote:  
| More specifically, in light of the fact that certain external parties may be present, should we

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<Inf memo lion and elephant hunting 7-10-17 rev.docx>

<Lion and Elephant ESA Listings 1-pager.docx>

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## INFORMATION/BRIEFING MEMORANDUM FOR THE SECRETARY

DATE: July 10, 2017

FROM: Greg Sheehan, Acting Director, U.S. Fish and Wildlife Service

SUBJECT: Lion and Elephant ESA listings and the permitting process

The purpose of this memorandum is to provide background on lion and elephant listings under the Endangered Species Act (ESA), the process for obtaining authorization under the ESA to import sport-hunted trophies, and the status of ESA findings for certain African countries.

### BACKGROUND

In December 2015, The U.S. Fish and Wildlife Service (Service) listed the lion subspecies *Panthera leo leo*, located in India and west and central Africa, as endangered and listed *Panthera leo melanochaita*, located in eastern and southern Africa, as threatened. The Service also finalized a 4(d) rule for *Panthera leo melanochaita* that included the requirement that an import permit would need to be obtained prior to the import of any lion specimen.

The African elephant is listed as threatened (throughout its range) under the ESA and trade in African elephant specimens is regulated by a Section 4(d) rule of the Act (50 CFR 17.40(e)). On June 6, 2016, the Service published a final rule amending the Section 4(d) rule to, among other things, require the issuance of an ESA permit for all imports of African elephant trophies and ivory.

### DISCUSSION

In accordance with Service regulations for the implementation of the ESA (50 CFR 17.33), in order to issue an import permit for a personally hunted lion trophy, the applicant must demonstrate that the import of a sport-hunted lion trophy would enhance the propagation or survival of the species in the wild. However, for most sport-hunted trophy imports, the hunter typically does not have access to all of the information the Service needs to make a positive “enhancement finding.” To address this issue, the Service undertakes direct efforts to gather the information necessary to determine whether an “enhancement finding” can be made. To do so, the Service contacts the wildlife authority within the country where the trophy was taken to obtain information on the status of the species within the country, the management program for the species and how sport hunting is integrated into that management plan, how funds generated through hunting contribute to the conservation of the species, how local communities benefit from hunting operations, and other relevant information. Likewise, sport-hunted trophies of African elephants may only be authorized if the Service is able to find that the killing of the trophy animal will enhance the survival of the species, as called for in the 4(d) rule (50 CFR 17.40(e)).

Historically, more than 90% of sport-hunted lion trophies (approximately 400 per year) have been imported to the United States from South Africa. Therefore, the Service prioritized making an enhancement determination for South Africa. In October 2016, we completed a positive enhancement finding for “wild” and “wild-managed” lions from South Africa and a negative finding for “captive” lions. To date, the Service has authorized the import of nine wild/wild-managed lion trophies from South Africa taken in 2016. We have also denied five applications for the importation of captive-bred lions taken in South Africa in 2016. (See attachment 2 and 3).

As of July 10, 2017, we have the following pending applications for lions:

Mozambique –	3 applications for lions taken in 2016 or 2017
Namibia –	2 applications for lion taken in 2016 and 2017
Tanzania –	17 applications for lions taken in 2016 or 2017
South Africa –	11 applications for wild/wild-managed or captive-bred lions taken in 2017
Zambia –	16 applications for lions taken in 2016 or 2017
Zimbabwe –	17 applications for lions taken in 2016 or 2017

As of July 10, 2017, we have the following pending applications for elephants:

Namibia –	6 applications for elephants taken in 2014 (2 renewals), 2016 and 2017
Tanzania –	2 applications for elephants taken in 2016
South Africa –	11 applications for elephants taken in 2016 and 2017
Zambia –	4 applications for elephants taken in 2017
Zimbabwe –	37 applications for elephants taken in 2014 (3), 2016 or 2017

With regard to sport-hunted elephants, we currently have positive findings for the import of trophies from South Africa and Namibia. In 2014 and 2015, we completed negative findings for Tanzania and Zimbabwe, countries for which we previously had positive findings. We have not authorized the import of sport-hunted elephant trophies for any other countries that currently allow sport hunting. We are currently under litigation for our negative findings for both Tanzania and Zimbabwe.

## **NEXT STEPS**

Status of lion and elephant enhancement findings:

Mozambique – The Service has received information from Mozambique for both elephants and lions, and we are currently reviewing the material regarding the status of lions within the country and the management program that is currently in place for the species. Draft findings are underway.

Namibia – The Service has a positive finding for elephants. The Service has requested information regarding lions from Namibia on several occasions, but has not received any information regarding status of the lions in the country or the management regime for the species.

Tanzania – The Service has received information from Tanzania regarding the status of lions and elephants and their management programs. The material has been reviewed and we anticipate completing these findings by the end of July.

South Africa – The Service has a positive finding for elephants. Based on information received from South Africa and other sources, the Service made a positive finding for wild/wild-managed lions taken in 2016 and a negative finding for captive-bred lions taken in 2016. We are currently revising the finding for wild/wild-managed lions taken between 2017 and 2019 (South Africa's lion management plan for wild/wild-managed lions is valid until the end of 2019). We have received no new information for captive-bred lions that would change our current negative finding. The new finding will be completed by mid-July.

Zambia – The Service has received information from the Zambia Wildlife Authority on the status of lions in Zambia and their hunting programs for both lions and elephants. We have reviewed this information and have a draft finding that is currently being reviewed. We anticipate completing the finding by the end of July.

Zimbabwe – The Service has received and reviewed the information provided by Zimbabwe for both elephants and lions. We anticipate completing a new elephant finding in July, and a draft finding for lions is underway.

## **ATTACHMENTS**

None

## Lion and Elephant ESA Listings and the Permitting Process

- Lions (*Panthera leo melanochaita*) and African elephants (*Loxodonta africana*) are both listed as Threatened under the U.S. Endangered Species Act (ESA);
- Import of sport-hunted trophies requires an ESA permit, which can be issued if the Fish and Wildlife Service is able to make a finding that the sport-hunting activity enhances the survival of the species in the wild;
- For elephants, we currently have positive findings and allow the import of such trophies from South Africa and Namibia. We have negative findings for Tanzania and Zimbabwe for 2014 and 2015 and our reevaluating both countries for the 2016 and 2017 hunting seasons. We are completing findings for Mozambique and Zambia, where we do not currently have any finding in place;
- U.S. imports of sport-hunted elephant trophies in 2013: Botswana = 181; Namibia = 30; Tanzania = 34; South Africa = 60; Zambia = 5; Zimbabwe = 188;
- As of July 10, we have 55 permit applications for elephants taken in 2016 or 2017;
- For lions, we have a positive finding for “wild” and “wild-managed” lions from South Africa and a negative finding for “captive” lions for 2016. We are finalizing findings for South Africa for 2017-19 and for Tanzania, Zambia and Zimbabwe in July.
- U.S. imports of sport-hunted lion trophies in 2013: Burkino Faso = 3; Mozambique = 6; Namibia = 9; South Africa = 545 trophies; Tanzania = 3; Zambia = 17; Zimbabwe = 44 trophies.
- As of July 10, we have 66 pending permit applications for lions taken in 2016 or 2017.

## Conversation Contents

**Fwd: CBD HSUS HSI Supplemental Letter on Tanzania Elephant & Lion Trophy Imports**

**Attachments:**

/1. Fwd: CBD HSUS HSI Supplemental Letter on Tanzania Elephant & Lion Trophy Imports/1.1 Supplemental Letter to USFWS on Tanzania Trophy Imports (1.25.2018).pdf  
/1. Fwd: CBD HSUS HSI Supplemental Letter on Tanzania Elephant & Lion Trophy Imports/1.2 Lindsey et al 2013 bushmeat trade in savannaspdf.pdf  
/1. Fwd: CBD HSUS HSI Supplemental Letter on Tanzania Elephant & Lion Trophy Imports/1.3 Williams et al a roaring trade.pdf

**"Bell, Gloria" <gloria\_bell@fws.gov>**

---

**From:** "Bell, Gloria" <gloria\_bell@fws.gov>  
**Sent:** Mon Jan 29 2018 11:29:35 GMT-0700 (MST)  
**To:** Greg Sheehan <greg\_j\_sheehan@fws.gov>, Jim Kurth <jim\_kurth@fws.gov>, Barbara Wainman <barbara\_wainman@fws.gov>  
**CC:** Craig Hoover <craig\_hoover@fws.gov>  
**Subject:** Fwd: CBD HSUS HSI Supplemental Letter on Tanzania Elephant & Lion Trophy Imports  
**Attachments:** Supplemental Letter to USFWS on Tanzania Trophy Imports (1.25.2018).pdf Lindsey et al 2013 bushmeat trade in savannaspdf.pdf Williams et al a roaring trade.pdf

fyi

----- Forwarded message -----

**From:** **Gnam, Rosemarie** <[rosemarie\\_gnam@fws.gov](mailto:rosemarie_gnam@fws.gov)>  
**Date:** Thu, Jan 25, 2018 at 4:43 PM  
**Subject:** Fwd: CBD HSUS HSI Supplemental Letter on Tanzania Elephant & Lion Trophy Imports  
**To:** Gloria Bell <[Gloria\\_Bell@fws.gov](mailto:Gloria_Bell@fws.gov)>

FYI

----- Forwarded message -----

**From:** **Tanya Sanerib** <[TSanerib@biologicaldiversity.org](mailto:TSanerib@biologicaldiversity.org)>  
**Date:** Thu, Jan 25, 2018 at 4:28 PM  
**Subject:** CBD HSUS HSI Supplemental Letter on Tanzania Elephant & Lion Trophy Imports  
**To:** "[tim\\_vannorman@fws.gov](mailto:tim_vannorman@fws.gov)" <[tim\\_vannorman@fws.gov](mailto:tim_vannorman@fws.gov)>, Rosemarie Gnam <[rosemarie\\_gnam@fws.gov](mailto:rosemarie_gnam@fws.gov)>  
**Cc:** Anna Frostic <[afrostic@humanesociety.org](mailto:afrostic@humanesociety.org)>, Teresa Telecky <[ttelecky@hsi.org](mailto:ttelecky@hsi.org)>

Dear Mr. Van Norman and Dr. Gnam,

Attached is a supplemental letter regarding elephant and lion trophy imports from Tanzania, which follows up on our letters from October, 2017. We continue to encourage you to not grant import permits for elephant and lion trophies from Tanzania or make positive enhancement or NDF findings for Tanzania at this time. As you will see, our letter references several scientific studies, many of which we provide hyperlinks to in our references section. However, if you would prefer, we can provide all the cited references via email - please just let us know.

Thank you for consideration of the attached letter and please let me know if you have any troubles with the attachments, and feel free to contact us with any questions.

Sincerely,  
Tanya

Tanya Sanerib  
Senior Attorney &  
International Program Legal Director  
Center for Biological Diversity  
+1 (206) 379.7363 /Skype: t-maire.sanerib

This email may contain material that is confidential, privileged and/or attorney work product for the sole use of the intended recipient. Any review, reliance or distribution by others or forwarding without express permission is strictly prohibited. If you are not the intended recipient, please contact the sender and delete all copies.

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Rosemarie Gnam, Ph.D.  
Chief  
Division of Scientific Authority- International Affairs  
**U. S. Fish and Wildlife Service**  
**MS: IA**  
**5275 LEESBURG PIKE**  
**FALLS CHURCH, VA 22041-3803**

Phone: (703) 358-2497  
Fax: (703) 358-2276

[www.fws.gov/international](http://www.fws.gov/international)

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# Conversation Contents

Information Memo re: Secretarial Meeting with African Conservation Ministries' on Trophy Imports

**Attachments:**

/2. Information Memo re: Secretarial Meeting with African Conservation Ministries' on Trophy Imports/1.1 FWS African Ministries Memo 1.19.18.docx

**"Morris, Charisa" <charisa\_morris@fws.gov>**

---

**From:** "Morris, Charisa" <charisa\_morris@fws.gov>  
**Sent:** Fri Jan 19 2018 11:58:26 GMT-0700 (MST)  
**To:** Downey Magallanes <downey\_magallanes@ios.doi.gov>  
Greg Sheehan <greg\_j\_sheehan@fws.gov>, Stephen Guertin <stephen\_guertin@fws.gov>, Jim Kurth <jim\_kurth@fws.gov>, Kashif Askari <kashif\_askari@fws.gov>, Zachariah Gambill <zack\_gambill@fws.gov>, "Larrabee, Jason" <jason\_larrabee@ios.doi.gov>, Aurelia Skipwith <aurelia\_skipwith@ios.doi.gov>, "Foster, Maureen" <maureen\_foster@ios.doi.gov>, Wendy Fink <wendy\_r\_fink@ios.doi.gov>  
**CC:**  
**Subject:** Information Memo re: Secretarial Meeting with African Conservation Ministries' on Trophy Imports  
**Attachments:** FWS African Ministries Memo 1.19.18.docx

Good afternoon, Downey-

Please see the attached information memo, as requested, and let me know if you need any additional information.

Thanks!  
Charisa

--

[Charisa.Morris@fws.gov](mailto:Charisa.Morris@fws.gov) | Chief of Staff, Office of the Director | U.S. Fish & Wildlife Service | 1849 C Street NW, Room 3348 | Washington, DC 20240 | (202) 208-3843 | For urgent matters, please dial cell: 301-875-8937

# Conversation Contents

**Fwd: It ain't perfect, but....**

**Attachments:**

/4. Fwd: It ain't perfect, but..../1.1 Wildlife Trafficking Communications Strategy V2.docx

**"Wainman, Barbara" <barbara\_wainman@fws.gov>**

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**From:** "Wainman, Barbara" <barbara\_wainman@fws.gov>  
**Sent:** Mon Dec 04 2017 10:52:49 GMT-0700 (MST)  
**To:** Jim Kurth <jim\_kurth@fws.gov>  
**Subject:** Fwd: It ain't perfect, but....  
**Attachments:** Wildlife Trafficking Communications Strategy V2.docx

Barbara W. Wainman  
Assistant Director, External Affairs  
US Fish and Wildlife Service  
(202) 208-5256 (office)  
(571) 471-4159 (cell)

----- Forwarded message -----

**From:** **Shire, Gavin** <[gavin\\_shire@fws.gov](mailto:gavin_shire@fws.gov)>  
**Date:** Sun, Dec 3, 2017 at 6:01 PM  
**Subject:** It ain't perfect, but....  
**To:** Barbara Wainman <[barbara\\_wainman@fws.gov](mailto:barbara_wainman@fws.gov)>, Matthew Huggler <[matthew\\_huggler@fws.gov](mailto:matthew_huggler@fws.gov)>, Craig Hoover <[craig\\_hoover@fws.gov](mailto:craig_hoover@fws.gov)>, Danielle Kessler <[danielle\\_kessler@fws.gov](mailto:danielle_kessler@fws.gov)>, Laury Parramore <[laury\\_parramore@fws.gov](mailto:laury_parramore@fws.gov)>

...it's what I could do in the time. Thanks to Craig, Danielle Kessler, Doug, Lisa and Jeanne Van Lanker for all their help.

Next steps:

1. Logo
2. Theme tune
3. Ticker-tape parade

G

Gavin Shire  
Chief of Public Affairs  
U.S. Fish and Wildlife Service

MS: EA  
5275 Leesburg Pike  
Falls Church, VA 22041-3803  
703-358-2649 (o)  
703-346-9123 (c)  
[gavin\\_shire@fws.gov](mailto:gavin_shire@fws.gov)

# Conversation Contents

Re: New RIN assignments

**"Patel, Kashyap" <kashyap\_patel@fws.gov>**

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**From:** "Patel, Kashyap" <kashyap\_patel@fws.gov>  
**Sent:** Tue Nov 14 2017 08:59:07 GMT-0700 (MST)  
**To:** "Craghead, Anissa" <anissa\_craghead@fws.gov>  
Michael Gale <michael\_gale@fws.gov>, Susan Wilkinson  
**CC:** <susan\_wilkinson@fws.gov>, Megan Apgar  
<megan\_apgar@ios.doi.gov>, Jim Kurth <jim\_kurth@fws.gov>  
**Subject:** Re: New RIN assignments

Hi Anissa,

I talked to Jim. Go ahead and do whatever needs to be done so we can make the fall agenda. These dates seem to have the least consternation among everyone involved and they don't us from executing even faster than these targeted dates.

Please let us know if anything threatens our ability to publish in the fall agenda.

Thanks so much for looking out for us!  
Kashyap

On Tue, Nov 14, 2017 at 7:49 AM, Craghead, Anissa <[anissa\\_craghead@fws.gov](mailto:anissa_craghead@fws.gov)> wrote:

Hi, Kashyap. Are the projected publication dates for RINs 1018-BC93, 1018-BC94, and 1018-BC95 settled? I ask because the longer it takes to settle on dates, the greater the chance that these RINs will not appear, or could appear with incorrect information, in the Fall unified agenda.

In ROCIS (the database that tracks RINs for OMB), these RINs are marked as "future RINs," that is, not publishing in the Fall agenda because we haven't settled on projected publication dates. Being in "future RIN" status allows FWS to make updates to the RINs; as soon as we make them "active" RINs (that is, RINs that will appear in the next published agenda), we cannot make updates to them. We can ask GSA to make small changes to our active RINs on our behalf, but even that option is very quickly coming to a close. **I do not have a hard date for last changes.** As far as I know, and Megan Apgar (Exec Sec) may know more about this, OMB wants to publish the agenda in late November. As such, if we don't get the dates settled now, these RINs may not appear, or may appear with incorrect information, in the published agenda.

I need to know:

1. Are the following projected publication dates accurate?

1018-BC94 (Revising the Endangered Species Act Section 4(d) Rule for the African Elephant): **01/00/2018** (note: this may be difficult to achieve due to the time required for the clearance process together with the upcoming holidays)

1018-BC95 (Revising the Endangered Species Act Section 4(d) Rule for the African Lion):  
**02/00/2018**

2. If the projected publication dates haven't been finalized, does the DO want to change the status of the RINs from "future" to "active" now anyway, so that the RINs will publish in the Fall 2017 unified agenda, even if the information that publishes ends up being inaccurate?

Megan or Sue, do you have anything to add?

Thanks,  
Anissa

On Mon, Nov 13, 2017 at 11:01 AM, Patel, Kashyap <[kashyap\\_patel@fws.gov](mailto:kashyap_patel@fws.gov)> wrote:  
Hi Anisa,

I think we're going to set up 15-30 minutes for Jim, Shaun and Gary to discuss new proposed dates, and the utility of maybe breaking down the dates Greg saw in terms of program time, DO time and FWP time in the process. If we do, it may be helpful to have you on the line. I'll let you know.

Thanks,  
Kashyap

On Mon, Nov 13, 2017 at 10:29 AM, Craghead, Anissa <[anissa\\_craghead@fws.gov](mailto:anissa_craghead@fws.gov)> wrote:

Thanks, Michael!  
Kashyap, I'm working from home today (b)(6) if you want to talk. Otherwise, we can email.

Anissa

On Mon, Nov 13, 2017 at 10:25 AM, Michael Gale <[michael\\_gale@fws.gov](mailto:michael_gale@fws.gov)> wrote:  
+ Kashyap Patel

Kashyap is running point on this while he is acting as Deputy Chief of Staff this week.

Greg wanted to see if we could tighten these timelines, but the programs are not sure that is feasible. Kashyap has the specifics and can walk through them with you over the phone or email.

Michael

--

Michael Gale

Deputy Chief of Staff (Acting), Director's Office  
U.S. Fish and Wildlife Service

202.208.4923 (office)  
571.982.2158 (cell)

On Nov 13, 2017, at 9:27 AM, Craghead, Anissa <[anissa\\_craghead@fws.gov](mailto:anissa_craghead@fws.gov)> wrote:

Hi, Michael.

I had no idea Charisa was going to be out. Can you please read this email string and let me know if a decision has been made regarding the projected publication dates of the three new RINs (BC93, BC94, and BC95)?

Thanks,  
Anissa

----- Forwarded message -----

From: **Craghead, Anissa** <[anissa\\_craghead@fws.gov](mailto:anissa_craghead@fws.gov)>

Date: Mon, Nov 13, 2017 at 9:24 AM

Subject: Re: New RIN assignments

To: "Morris, Charisa" <[charisa\\_morris@fws.gov](mailto:charisa_morris@fws.gov)>

Hi, Charisa. Were decisions ever made about the projected publication dates of these proposed rule actions? In order for them to be included in the Fall 2017 agenda (if that is still possible---I don't know), we need to input the correct information as soon as possible.

Thanks,  
Anissa

On Tue, Nov 7, 2017 at 5:15 PM, Morris, Charisa <[charisa\\_morris@fws.gov](mailto:charisa_morris@fws.gov)> wrote:

Good afternoon, folks-

I have given FWP a heads up that Greg needs to have a discussion with them about reasonable timelines associated with these RINs. At this point, I have the following to suggest to Greg as reasonable timelines, per your responses to this thread:

1018-BC93 (Compatibility Regulations Pursuant to the National Wildlife Refuge System Improvement Act of 1997): **03/00/2018**

1018-BC94 (Revising the Endangered Species Act Section 4(d) Rule for the African Elephant): **TBD, after a discussion with Greg**

1018-BC95 (Revising the Endangered Species Act Section 4(d) Rule for the African Lion): **2/00/2017**

Let me know if these work, and we can try to work with FWP to clarify expectations.

Thanks,  
Charisa

On Tue, Nov 7, 2017 at 7:38 AM, Craghead, Anissa <[anissa\\_craghead@fws.gov](mailto:anissa_craghead@fws.gov)> wrote:

The "00" in the date means that it could be any day in the month, and

it's the way the database accepts dates unless you have a specific publication date and Federal Register citation to report.

Because, according to Charisa, Greg has expressed the following publication expectation:

- Lion target publication date is 12/15/17
- Elephant and refuges target publication date is 1/15/17 [sic]

I inserted the 01/00/2018 publication projection for your proposed rule. If you negotiate a different date with the Director's Office for your proposal, please let me know, and I'll update it in the database.

Anissa

On Tue, Nov 7, 2017 at 7:32 AM, Cynthia Martinez <[cynthia\\_martinez@fws.gov](mailto:cynthia_martinez@fws.gov)> wrote:

Since I don't know what day 00 is and we have been informed that no packages will be moving between December 15th and January 4th, We should push the Refuge one out to March 30, 2018.

Cynthia

On Nov 6, 2017, at 4:21 PM, Craghead, Anissa <[anissa\\_craghead@fws.gov](mailto:anissa_craghead@fws.gov)> wrote:

In ROCIS, I changed the projected publication dates as follows:

1018-BC93 (Compatibility Regulations Pursuant to the National Wildlife Refuge System Improvement Act of 1997): 01/00/2018

1018-BC94 (Revising the Endangered Species Act Section 4(d) Rule for the African Elephant): 01/00/2018

1018-BC95 (Revising the Endangered Species Act Section 4(d) Rule for the African Lion): 12/00/2017

On Mon, Nov 6, 2017 at 3:57 PM, Morris, Charisa <[charisa\\_morris@fws.gov](mailto:charisa_morris@fws.gov)> wrote:

Greg has expressed the following publication expectation:

- Lion target publication date is 12/15/17
- Elephant and refuges target publication date is 1/15/17

Please let me know if you need to visit with him about these dates before they are shared.

Thanks,  
Charisa

On Mon, Nov 6, 2017 at 12:05 PM, Craghead, Anissa <[anissa\\_craghead@fws.gov](mailto:anissa_craghead@fws.gov)> wrote:

1018-BC93: Compatibility Regulations Pursuant to the National Wildlife Refuge System Improvement Act of 1997

1018-BC94: Revising the Endangered Species Act Section 4(d) Rule for the African Elephant

1018-BC95: Revising the Endangered Species Act Section 4(d) Rule for the African Lion

**Megan, does Stu need to review these before Liz takes them out of future RIN status?**

*Please note:*

I received direct input from IA on BC94, but I didn't hear from Refuges or ES for the other two RIN assignments.

For all three proposed rules, I set the projected publication date at 02/00/2018, based on the (incomplete) information I have. These may be incorrect.

For all three proposed rules, I set the priority as "substantive, not significant," but this may be incorrect. I don't have definitive information for that field.

Agenda review reports are attached.

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[Charisa.Morris@fws.gov](mailto:Charisa.Morris@fws.gov) | Chief of Staff, Office of the Director | U.S. Fish & Wildlife Service | [1849 C Street NW, Room 3348](#) | Washington, DC 20240 | (202) 208-3843 | For urgent matters, please dial cell: 301-875-8937

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[Charisa.Morris@fws.gov](mailto:Charisa.Morris@fws.gov) | Chief of Staff, Office of the Director | U.S. Fish & Wildlife Service | [1849 C Street NW, Room 3348](#) | Washington, DC 20240 | (202) 208-3843 | For urgent matters, please dial cell: 301-875-8937

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Kashyap Patel  
Management Analyst  
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Telephone: 703-358-1957  
Fax: 703-358-1997

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Kashyap Patel  
Management Analyst  
Division of Policy, Performance, and Management Programs  
U.S. Fish and Wildlife Service  
Telephone: 703-358-1957  
Fax: 703-358-1997

## "Craghead, Anissa" <[anissa\\_craghead@fws.gov](mailto:anissa_craghead@fws.gov)>

---

**From:** "Craghead, Anissa" <[anissa\\_craghead@fws.gov](mailto:anissa_craghead@fws.gov)>  
**Sent:** Tue Nov 14 2017 09:15:09 GMT-0700 (MST)  
**To:** "Patel, Kashyap" <[kashyap\\_patel@fws.gov](mailto:kashyap_patel@fws.gov)>  
**CC:** Michael Gale <[michael\\_gale@fws.gov](mailto:michael_gale@fws.gov)>, Susan Wilkinson <[susan\\_wilkinson@fws.gov](mailto:susan_wilkinson@fws.gov)>, Megan Apgar <[megan\\_apgar@ios.doi.gov](mailto:megan_apgar@ios.doi.gov)>, Jim Kurth <[jim\\_kurth@fws.gov](mailto:jim_kurth@fws.gov)>  
**Subject:** Re: New RIN assignments

I've contacted our liaison at GSA-RISC. I will let you know when I hear back from her.

On Tue, Nov 14, 2017 at 10:59 AM, Patel, Kashyap <[kashyap\\_patel@fws.gov](mailto:kashyap_patel@fws.gov)> wrote:  
Hi Anissa,

I talked to Jim. Go ahead and do whatever needs to be done so we can make the fall agenda. These dates seem to have the least consternation among everyone involved and they don't us from executing even faster than these targeted dates.

Please let us know if anything threatens our ability to publish in the fall agenda.

Thanks so much for looking out for us!  
Kashyap

On Tue, Nov 14, 2017 at 7:49 AM, Craghead, Anissa <[anissa\\_craghead@fws.gov](mailto:anissa_craghead@fws.gov)> wrote:  
Hi, Kashyap. Are the projected publication dates for RINs 1018-BC93, 1018-BC94, and 1018-BC95 settled? I ask because the longer it takes to settle on dates, the greater the chance that these RINs will not appear, or could appear with incorrect information, in the Fall unified agenda.

In ROCIS (the database that tracks RINs for OMB), these RINs are marked as "future RINs," that is, not publishing in the Fall agenda because we haven't settled on projected publication dates. Being in "future RIN" status allows FWS to make updates to the RINs; as soon as we make them "active" RINs (that is, RINs that will appear in the next published agenda), we cannot make updates to them. We can ask GSA to make small changes to our active RINs on our behalf, but even that option is very quickly coming to a close. **I do not have a hard date for last changes.** As far as I know, and Megan Apgar (Exec Sec) may know more about this, OMB wants to publish the agenda in late November. As such, if we don't get the dates settled now, these RINs may not appear, or may appear with incorrect information, in the published agenda.

I need to know:

1. Are the following projected publication dates accurate?

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1018-BC94 (Revising the Endangered Species Act Section 4(d) Rule for the African Elephant): **01/00/2018** (note: this may be difficult to achieve due to the time required for the clearance process together with the upcoming holidays)

1018-BC95 (Revising the Endangered Species Act Section 4(d) Rule for the African Lion): **02/00/2018**

2. If the projected publication dates haven't been finalized, does the DO want to change the status of the RINs from "future" to "active" now anyway, so that the RINs will publish in the Fall 2017 unified agenda, even if the information that publishes ends up being inaccurate?

Megan or Sue, do you have anything to add?

Thanks,  
Anissa

On Mon, Nov 13, 2017 at 11:01 AM, Patel, Kashyap <[kashyap\\_patel@fws.gov](mailto:kashyap_patel@fws.gov)> wrote:  
Hi Anisa,

I think we're going to set up 15-30 minutes for Jim, Shaun and Gary to discuss new proposed dates, and the utility of maybe breaking down the dates Greg saw in terms of program time, DO time and FWP time in the process. If we do, it may be helpful to have you on the line. I'll let you know.

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Thanks, Michael!

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Anissa

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+ Kashyap Patel

Kashyap is running point on this while he is acting as Deputy Chief of Staff this week.

Greg wanted to see if we could tighten these timelines, but the programs are not sure that is feasible. Kashyap has the specifics and can walk through them with you over the phone or email.

Michael

--

## Michael Gale

Deputy Chief of Staff (Acting), Director's Office  
U.S. Fish and Wildlife Service

202.208.4923 (office)  
571.982.2158 (cell)

On Nov 13, 2017, at 9:27 AM, Craghead, Anissa <[anissa\\_craghead@fws.gov](mailto:anissa_craghead@fws.gov)> wrote:

Hi, Michael.  
I had no idea Charisa was going to be out. Can you please read this email string and let me know if a decision has been made regarding the projected publication dates of the three new RINs (BC93, BC94, and BC95)?

Thanks,  
Anissa

----- Forwarded message -----

From: **Craghead, Anissa** <[anissa\\_craghead@fws.gov](mailto:anissa_craghead@fws.gov)>  
Date: Mon, Nov 13, 2017 at 9:24 AM  
Subject: Re: New RIN assignments  
To: "Morris, Charisa" <[charisa\\_morris@fws.gov](mailto:charisa_morris@fws.gov)>

Hi, Charisa. Were decisions ever made about the projected publication dates of these proposed rule actions? In order for them to be included in the Fall 2017 agenda (if that is still possible---I don't know), we need to input the correct information as soon as possible.

Thanks,  
Anissa

On Tue, Nov 7, 2017 at 5:15 PM, Morris, Charisa <[charisa\\_morris@fws.gov](mailto:charisa_morris@fws.gov)> wrote:

Good afternoon, folks-

I have given FWP a heads up that Greg needs to have a discussion with them about reasonable timelines associated with these RINs. At this point, I have the following to suggest to Greg as reasonable timelines, per your responses to this thread:

1018-BC93 (Compatibility Regulations Pursuant to the National Wildlife Refuge System Improvement Act of 1997): **03/00/2018**

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1018-BC95 (Revising the Endangered Species Act Section 4(d) Rule for the African Lion): **2/00/2017**

Let me know if these work, and we can try to work with FWP to clarify expectations.

Thanks,  
Charisa

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The "00" in the date means that it could be any day in the month, and it's the way the database accepts dates unless you have a specific publication date and Federal Register citation to report.

Because, according to Charisa, Greg has expressed the following publication expectation:

- Lion target publication date is 12/15/17
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I inserted the 01/00/2018 publication projection for your proposed rule. If you negotiate a different date with the Director's Office for your proposal, please let me know, and I'll update it in the database.

Anissa

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<[cynthia\\_martinez@fws.gov](mailto:cynthia_martinez@fws.gov)> wrote:

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Cynthia

On Nov 6, 2017, at 4:21 PM, Craghead, Anissa  
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On Mon, Nov 6, 2017 at 3:57 PM, Morris, Charisa  
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Please let me know if you need to visit with him about these dates before they are shared.

Thanks,  
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**Megan, does Stu need to review these before Liz takes them out of future RIN status?**

*Please note:*

I received direct input from IA on BC94, but I didn't hear from Refuges or ES for the other two RIN assignments.

For all three proposed rules, I set the projected publication date at 02/00/2018, based on the (incomplete) information I have. These may be incorrect.

For all three proposed rules, I set the priority as "substantive, not significant," but this may be incorrect. I don't have definitive information for that field.

Agenda review reports are attached.

--

[Charisa Morris@fws.gov](mailto:Charisa_Morris@fws.gov) | Chief of Staff, Office of the Director | U.S. Fish & Wildlife Service | [1849 C Street NW, Room 3348](#) | Washington, DC 20240 | (202) 208-3843 | For urgent matters, please dial cell: 301-875-8937

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Kashyap Patel  
Management Analyst

Division of Policy, Performance, and Management Programs  
U.S. Fish and Wildlife Service  
Telephone: 703-358-1957  
Fax: 703-358-1997

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## **"Craghead, Anissa" <[anissa\\_craghead@fws.gov](mailto:anissa_craghead@fws.gov)>**

---

**From:** "Craghead, Anissa" <[anissa\\_craghead@fws.gov](mailto:anissa_craghead@fws.gov)>  
**Sent:** Tue Nov 14 2017 10:53:45 GMT-0700 (MST)  
**To:** "Patel, Kashyap" <[kashyap\\_patel@fws.gov](mailto:kashyap_patel@fws.gov)>  
**CC:** Michael Gale <[michael\\_gale@fws.gov](mailto:michael_gale@fws.gov)>, Susan Wilkinson <[susan\\_wilkinson@fws.gov](mailto:susan_wilkinson@fws.gov)>, Megan Apgar <[megan\\_apgar@ios.doi.gov](mailto:megan_apgar@ios.doi.gov)>, Jim Kurth <[jim\\_kurth@fws.gov](mailto:jim_kurth@fws.gov)>  
**Subject:** Re: New RIN assignments

All three are "active" RINs now and will be included in the Fall 2017 unified agenda (when it publishes; we don't know that date yet).

Anissa

On Tue, Nov 14, 2017 at 11:15 AM, Craghead, Anissa <[anissa\\_craghead@fws.gov](mailto:anissa_craghead@fws.gov)> wrote:  
I've contacted our liaison at GSA-RISC. I will let you know when I hear back from her.

On Tue, Nov 14, 2017 at 10:59 AM, Patel, Kashyap <[kashyap\\_patel@fws.gov](mailto:kashyap_patel@fws.gov)> wrote:  
Hi Anissa,

I talked to Jim. Go ahead and do whatever needs to be done so we can make the fall agenda. These dates seem to have the least consternation among everyone involved and they don't us from executing even faster than these targeted dates.

Please let us know if anything threatens our ability to publish in the fall agenda.

Thanks so much for looking out for us!  
Kashyap

On Tue, Nov 14, 2017 at 7:49 AM, Craghead, Anissa <[anissa\\_craghead@fws.gov](mailto:anissa_craghead@fws.gov)> wrote:  
Hi, Kashyap. Are the projected publication dates for RINs 1018-BC93, 1018-BC94, and 1018-BC95 settled? I ask because the longer it takes to settle on dates, the greater the chance that these RINs will not appear, or could appear with incorrect information, in the Fall unified agenda.

In ROCIS (the database that tracks RINs for OMB), these RINs are marked as "future RINs," that is, not publishing in the Fall agenda because we haven't settled

on projected publication dates. Being in "future RIN" status allows FWS to make updates to the RINs; as soon as we make them "active" RINs (that is, RINs that will appear in the next published agenda), we cannot make updates to them. We can ask GSA to make small changes to our active RINs on our behalf, but even that option is very quickly coming to a close. **I do not have a hard date for last changes.** As far as I know, and Megan Apgar (Exec Sec) may know more about this, OMB wants to publish the agenda in late November. As such, if we don't get the dates settled now, these RINs may not appear, or may appear with incorrect information, in the published agenda.

I need to know:

1. Are the following projected publication dates accurate?

1018-BC93 (Compatibility Regulations Pursuant to the National Wildlife Refuge System Improvement Act of 1997): **03/00/2018**

1018-BC94 (Revising the Endangered Species Act Section 4(d) Rule for the African Elephant): **01/00/2018** (note: this may be difficult to achieve due to the time required for the clearance process together with the upcoming holidays)

1018-BC95 (Revising the Endangered Species Act Section 4(d) Rule for the African Lion): **02/00/2018**

2. If the projected publication dates haven't been finalized, does the DO want to change the status of the RINs from "future" to "active" now anyway, so that the RINs will publish in the Fall 2017 unified agenda, even if the information that publishes ends up being inaccurate?

Megan or Sue, do you have anything to add?

Thanks,  
Anissa

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Kashyap Patel  
Management Analyst  
Division of Policy, Performance, and Management Programs  
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Fax: 703-358-1997

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Kashyap Patel  
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Telephone: 703-358-1957  
Fax: 703-358-1997

# Conversation Contents

Timing of RINS - seeking DO approval

**"Morris, Charisa" <charisa\_morris@fws.gov>**

---

**From:** "Morris, Charisa" <charisa\_morris@fws.gov>  
**Sent:** Thu Nov 09 2017 15:52:26 GMT-0700 (MST)  
**To:** Greg Sheehan <greg\_j\_sheehan@fws.gov>, Jim Kurth <jim\_kurth@fws.gov>, Stephen Guertin <stephen\_guertin@fws.gov>  
**CC:** Zachariah Gambill <zachariah\_gambill@fws.gov>, Michael Gale <michael\_gale@fws.gov>, Kashyap Patel <kashyap\_patel@fws.gov>  
**Subject:** Timing of RINS - seeking DO approval

Good afternoon-

At this point, I have the following to suggest to Greg as reasonable timelines, per the ADs:

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1018-BC95 (Revising the Endangered Species Act Section 4(d) Rule for the African Lion): **2/00/2017**

These timelines are based on staff work needed (revisions PLUS EAs if necessary) and surname deadlines. As a reminder, we need final dates to put into the system to fully process these RIN requests. Kashyap, please confirm DO-approved dates with Anissa Craighead.

Thanks!  
Charisa

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**Greg Sheehan <greg\_j\_sheehan@fws.gov>**

---

**From:** Greg Sheehan <greg\_j\_sheehan@fws.gov>  
**Sent:** Sun Nov 12 2017 13:29:27 GMT-0700 (MST)  
**To:** "Morris, Charisa" <charisa\_morris@fws.gov>  
Jim Kurth <jim\_kurth@fws.gov>, Stephen Guertin <stephen\_guertin@fws.gov>, Zachariah Gambill

**CC:** <zachariah\_gambill@fws.gov>, Michael Gale  
<michael\_gale@fws.gov>, Kashyap Patel  
<kashyap\_patel@fws.gov>

**Subject:** Re: Timing of RINS - seeking DO approval

Thanks Charisa

I believe that even with the EA process (if needed) and surname process that we could accelerate these dates by several weeks each.

Please reprioritize these in the workload to identify what can be placed on temporary hold to move these more quickly.

Kashyap please email me achievable revised timelines and anticipated needs for EA work and what that would entail on each.

Thanks

Greg

Greg Sheehan  
Principal Deputy Director  
US Fish and Wildlife Service  
202-208-4545 office  
202-676-7675 cell

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**"Gale, Michael"** <[michael\\_gale@fws.gov](mailto:michael_gale@fws.gov)>

**From:** "Gale, Michael" <[michael\\_gale@fws.gov](mailto:michael_gale@fws.gov)>  
**Sent:** Mon Nov 13 2017 09:31:43 GMT-0700 (MST)

**To:** Gary Frazer <Gary\_Frazer@fws.gov>, Shaun Sanchez <shaun\_sanchez@fws.gov>, Cynthia Martinez <cynthia\_martinez@fws.gov>, Gina Shultz <Gina\_Shultz@fws.gov>, Gloria Bell <Gloria\_Bell@fws.gov>, Richard Ruggiero <richard\_ruggiero@fws.gov>  
**CC:** Kashyap Patel <kashyap\_patel@fws.gov>, Jim Kurth <jim\_kurth@fws.gov>, Stephen Guertin <stephen\_guertin@fws.gov>  
**Subject:** Fwd: Timing of RINS - seeking DO approval

Hello ES, Refuges, and IA,

Here is the email chain with Greg's request to adjust the timelines for the latest round of RINS.

Please let Kashyap Patel know of the revised timelines you're working on. We want to be able to provide Jim and Steve this information this week to give to Greg when he returns. It sounds like what makes sense is to have a bulleted timeline of when the product will be drafted, submitted to the Director's Office, and etc. through the process leading up to a targeted publication date.

Thanks,

Michael

----- Forwarded message -----

From: **Greg Sheehan** <[greg\\_j\\_sheehan@fws.gov](mailto:greg_j_sheehan@fws.gov)>  
Date: Sun, Nov 12, 2017 at 3:29 PM  
Subject: Re: Timing of RINS - seeking DO approval  
To: "Morris, Charisa" <[charisa\\_morris@fws.gov](mailto:charisa_morris@fws.gov)>  
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## Conversation Contents

Updated BP on lion trophies

**Attachments:**

/8. Updated BP on lion trophies/1.1 Inf memo lion and elephant hunting 8-3-17 final.docx

**"Guertin, Stephen" <stephen\_guertin@fws.gov>**

---

**From:** "Guertin, Stephen" <stephen\_guertin@fws.gov>  
**Sent:** Thu Aug 03 2017 08:57:28 GMT-0600 (MDT)  
**To:** Greg Sheehan <greg\_j\_sheehan@fws.gov>  
**CC:** Jim Kurth <Jim\_Kurth@fws.gov>, Charisa Morris <charisa\_morris@fws.gov>  
**Subject:** Updated BP on lion trophies  
**Attachments:** Inf memo lion and elephant hunting 8-3-17 final.docx

Greg

In addition to the update on the Feld Entertainment issue, the ASFWP requested an updated BP on the lion trophy issue, attached for you.

## Conversation Contents

**Fwd: CBD HSUS HSI Supplemental Letter on Tanzania Elephant & Lion Trophy Imports**

**Attachments:**

/1. Fwd: CBD HSUS HSI Supplemental Letter on Tanzania Elephant & Lion Trophy Imports/1.1 Supplemental Letter to USFWS on Tanzania Trophy Imports (1.25.2018).pdf  
/1. Fwd: CBD HSUS HSI Supplemental Letter on Tanzania Elephant & Lion Trophy Imports/1.2 Lindsey et al 2013 bushmeat trade in savannaspdf.pdf  
/1. Fwd: CBD HSUS HSI Supplemental Letter on Tanzania Elephant & Lion Trophy Imports/1.3 Williams et al a roaring trade.pdf

**"Bell, Gloria" <gloria\_bell@fws.gov>**

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**From:** "Bell, Gloria" <gloria\_bell@fws.gov>  
**Sent:** Mon Jan 29 2018 11:29:35 GMT-0700 (MST)  
**To:** Greg Sheehan <greg\_j\_sheehan@fws.gov>, Jim Kurth <jim\_kurth@fws.gov>, Barbara Wainman <barbara\_wainman@fws.gov>  
**CC:** Craig Hoover <craig\_hoover@fws.gov>  
**Subject:** Fwd: CBD HSUS HSI Supplemental Letter on Tanzania Elephant & Lion Trophy Imports  
**Attachments:** Supplemental Letter to USFWS on Tanzania Trophy Imports (1.25.2018).pdf Lindsey et al 2013 bushmeat trade in savannaspdf.pdf Williams et al a roaring trade.pdf

fyi

----- Forwarded message -----

**From:** **Gnam, Rosemarie** <[rosemarie\\_gnam@fws.gov](mailto:rosemarie_gnam@fws.gov)>  
**Date:** Thu, Jan 25, 2018 at 4:43 PM  
**Subject:** Fwd: CBD HSUS HSI Supplemental Letter on Tanzania Elephant & Lion Trophy Imports  
**To:** Gloria Bell <[Gloria\\_Bell@fws.gov](mailto:Gloria_Bell@fws.gov)>

FYI

----- Forwarded message -----

**From:** **Tanya Sanerib** <[TSanerib@biologicaldiversity.org](mailto:TSanerib@biologicaldiversity.org)>  
**Date:** Thu, Jan 25, 2018 at 4:28 PM  
**Subject:** CBD HSUS HSI Supplemental Letter on Tanzania Elephant & Lion Trophy Imports  
**To:** "[tim\\_vannorman@fws.gov](mailto:tim_vannorman@fws.gov)" <[tim\\_vannorman@fws.gov](mailto:tim_vannorman@fws.gov)>, Rosemarie Gnam <[rosemarie\\_gnam@fws.gov](mailto:rosemarie_gnam@fws.gov)>  
**Cc:** Anna Frostic <[afrostic@humanesociety.org](mailto:afrostic@humanesociety.org)>, Teresa Telecky <[ttelecky@hsi.org](mailto:ttelecky@hsi.org)>

Dear Mr. Van Norman and Dr. Gnam,

Attached is a supplemental letter regarding elephant and lion trophy imports from Tanzania, which follows up on our letters from October, 2017. We continue to encourage you to not grant import permits for elephant and lion trophies from Tanzania or make positive enhancement or NDF findings for Tanzania at this time. As you will see, our letter references several scientific studies, many of which we provide hyperlinks to in our references section. However, if you would prefer, we can provide all the cited references via email - please just let us know.

Thank you for consideration of the attached letter and please let me know if you have any troubles with the attachments, and feel free to contact us with any questions.

Sincerely,  
Tanya

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January 25, 2018

***Via Electronic Mail***

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Re: Imports of Elephant and Lion Trophies from Tanzania

Dear Dr. Gnam and Mr. Van Norman,

On behalf of the Center for Biological Diversity, The Humane Society of the United States, and Humane Society International, we are writing to provide you with additional information and scientific studies that support a U.S. Fish and Wildlife Service (hereinafter “the Service”) decision to not grant import permits for elephant and lion trophies from Tanzania. This letter is supplemental to our October, 2017 letters to your agency. Given that public notice and comment has not been provided<sup>1</sup> on the Service’s advice regarding country-wide Non-Detriment Findings it makes under the Convention on International Trade in Endangered Species of Wild Fauna and Flora (CITES) or its country-wide enhancement findings under the Endangered Species Act (ESA), we are writing to further document our concerns about the impact of lion and elephant sport-hunting in Tanzania. We also request copies of any ESA enhancement determinations for lion or elephant trophies and/or CITES non-detriment finding that your agency makes for elephant trophies from Tanzania.<sup>2</sup>

**I. Supplemental Information**

As you are undoubtedly aware, there have been numerous conflicting news and social media postings regarding trophy hunting in Tanzania. On October 24, 2017, the Minister for Natural Resources and Tourism announced that he was revoking hunting permits that had been issued to hunting companies. It seems that the revocation applies to all hunting permits, not just those for elephants. He called for a new system for issuing permits through auction to be implemented in 60 days.<sup>3</sup> Then on December 18, 2017, the Officer-in Charge at the Tanzania Wildlife Management Authority (TAWA) said that they are issuing only 100 elephant hunting licenses

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<sup>1</sup> While such notice and comment has not been provided historically, as the Service is aware the D.C. Circuit Court of Appeals recently held that such notice and comment is required by the Administrative Procedure Act. *Safari Club Int'l v. Zinke*, No. 16-5358, 2017 WL 6544114 (D.C. Cir. Dec. 22, 2017).

<sup>2</sup> We applaud the Service for issuing a negative Non-Detriment Finding for Tanzanian elephant trophy imports for 2016-2017, and strongly encourage the Service to continue this prohibition on imports in 2018 and beyond.

<sup>3</sup> <https://www.safariclub.org/detail/news/2017/10/24/tanzania-official-announces-changes-involving-hunting-permits-in-that-country>

per year.<sup>4</sup> However, the Minister has since then responded on Twitter that the news is false and that he has not issued any hunting permits and will not do so in 2018.<sup>5</sup> Thereafter, the government announced formation of a committee to “review the hunting blocks licenses” and “come up with recommendations on the best way of allocating them to hunters.”<sup>6</sup> These news reports certainly indicate that concerns exist in the Tanzanian government over how trophy hunting is managed in the country. Therefore, the Service should refrain from authorizing the importation of any sport-hunted trophies from Tanzania until these issues have been resolved.

While this hunting permit issue is being resolved, the Service must consider in any analysis it conducts of the impact of trophy hunting the recent levels of trophy exports from Tanzania and Tanzania’s CITES export quotas. Based on information contained in the CITES trade database, Tanzania exported 21 lion trophies and 97 leopard trophies in 2016 but no elephant trophies. However, Tanzania’s CITES export quotas for 2016 and 2017 are much larger: 100 elephants/200 tusks and 500 leopards for 2016, and for 2017, 50 elephants/100 tusks and 500 leopards. The Service must base its considerations on the much larger CITES export quotas rather than actual offtakes.

The Service must also consider two recent studies about the impacts of trophy hunting and of offtake of rare species. Recent research from Queen Mary University of London revealed that trophy hunting has more profound impacts on wildlife than previously thought (Knell and Martínez-Ruiz 2017). The authors, relying upon sexual selection theory that the fittest males typically breed, found that “the sorts of selectivity associated with human predation can lead to uniquely severe impacts on harvested populations” particularly when environmental change, such as climate change, is considered (Ibid.). They concluded that “the effect of selective harvesting on extinction risk under environmental change appears to be strong and should at least be considered when strongly sexually selected species are harvested” (Ibid.). Both African elephants and lions are strongly sexually selected species. This study illustrates not only the need to consider environmental changes in decision-making about hunting quotas but to also consider the need for ensuring that such hunting does not increase extinction risk.

Another recent study recommends consideration of the price of poached individuals as a predictor of when already rare animal populations are headed toward extinction instead of stabilization (Holden et al. 2017). While more directly related to the on-going elephant poaching crisis and the emerging lion poaching crisis, the findings of this study are important for making decisions about the impact of “legal offtake” in the face of illegal offtake.

Below we provide new information specific to elephant and lions in Tanzania, for the Service’s consideration.

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<sup>4</sup> <http://allafrica.com/stories/201712180290.html>

<sup>5</sup> <https://twitter.com/HKigwangalla/status/942810586538156034>

<sup>6</sup> <http://allafrica.com/stories/201712130692.html> and <http://allafrica.com/stories/201712290591.html>

## A. Elephants

A recent study by Beale et al. (2017) documents collusion between rangers and poachers in Tanzania. While the data are several years old, the study nevertheless is indicative of the substantial work that Tanzania must perform to combat poaching and reduce corruption.

The latest Monitoring the Illegal Killing of Elephants (MIKE), Proportion of Illegally Killed Elephants (PIKE), and Elephant Trade Information System (ETIS) information presented to the 69th meeting of the CITES Standing Committee held in November and December 2017 included that:

- “Elephant numbers have declined by approximately 79,000 (taking into account new populations that have been surveyed since 2006) for sites with comparable survey techniques in 2006 and 2015. This has been largely attributed to an over 60% decline in Tanzania’s elephant population. Despite this, Tanzania remains the region's stronghold, with an estimate of 50,433 ( $\pm$  8,502) elephants in 2015.”<sup>7</sup>
- Tanzania’s existing national elephant action plan was specified to last from only 2010-2015 and is being updated.<sup>8</sup>
- Tanzania had lower PIKE numbers than previously reported. However, as many MIKE sites received increased funding for anti-poaching efforts, it is unclear if there has been an overall decline in poaching, or simply a decline in poaching at MIKE sites.
- Tanzania is still engaged in the National Ivory Action Plan (NIAP) process and is still considered a party of “primary concern.”<sup>9</sup>
- In light of Tanzania’s failure to make progress on its NIAP, it was given 60-days from the end of SC69 to demonstrate forward progress to the CITES Standing Committee or it will face a trade suspension.

The Service must consider this information when considering authorizing the importation of elephant trophies from Tanzania, especially in light of a possible CITES trade suspension.

## B. Lions

There are several forms of lion offtake that we ask that the Service consider when evaluating the impact of the importation of lion trophies from Tanzania. But first, to put offtake into context, we point out that in evaluating the sustainability of lion trophies from Tanzania, UNEP-WCMC (2015) raised questions about estimates of lion populations and the amount of habitat they occupy suggesting these numbers may be inflated.

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<sup>7</sup> SC69 Doc. 51.1, Annex at 3.

<sup>8</sup> *Id.* at 8.

<sup>9</sup> *Id.* at 30; <https://www.cites.org/eng/niaps> .

UNEP-WCMC (2015) also found that habitat loss and illegal killing were the greatest threats to lions in Tanzania. Likewise, Tanzania noted, in its response to a request for lion information:

“Human-lion conflict is the most significant threat to lions in Tanzania. Nearly 200 lions are killed each year in response to attacks on livestock (an estimated minimum of 500 livestock are lost to lions each year) and, in more rare occasions, in response to attacks on humans. Less than 10 lions are killed through official “problem animal control” (PAC) for this reason per year. Additionally, poisoning and increasing loss of habitat are becoming growing threats to lion survival. (Consultation of Mr. P.I. Sarakikya, Acting Director of Wildlife for Tanzania, submitted on 27/11/11). No global genetic threat was identified for the lion in Tanzania as recently demonstrated by a microsatellites study of 44 lion samples from a range of hunting areas throughout the whole country, showing a high level of heterozygosity and a low coefficient of consanguinity (Laura Bertrand, 2013).”<sup>10</sup>

Therefore, when evaluating the impact of hunting on lion populations, the Service must consider the impact of all offtake, both legal and illegal, because the offtake of lions for hunting is additive to the illegal offtake.

In addition to direct persecution, loss of prey base is also negatively impacting lions in Tanzania. Lindsey et al. (2013) reported, “in Tanzania, 2,078 tonnes of bushmeat are confiscated annually with a value of >US\$50 million.” The authors point out that prey depletion is only going to worsen as human populations increase and settle in previously unsettled areas.

The lion bone trade is also a concern. A recent study revealed that Tanzania is one of only four countries reporting legal exports of lion bones to Asian countries (Williams et al. 2017). While Tanzania’s role in the legal trade is limited, the authors noted that “incidences of poaching are recurrently reported across the African continent” and that the trade (both illegal and legal) is not limited to Africa to Asia but “may involve the wider Asian diaspora” (noting four seizures in the U.S. since 2009 of lion related products) (Ibid.).

African lions face disease outbreaks that may be worsened by the growing impacts of climate change. Munson et al. 2008 showed that extreme floods and droughts exacerbated by climate change led to two disease outbreaks, one that killed one-third of the Serengeti lion population in 1994, and another that killed one-third of the Ngorongoro Crater population in 2001 (Ibid.). In the two years, extreme drought followed by heavy seasonal rains led to the convergence of two diseases, Canine Distemper Virus and Babesia, a blood parasite, causing the mass die-offs.

Beyond these myriad problems, there is inadequate trophy hunting management and corruption. As noted by Nelson et al. (2013), the allocation of hunting blocks gives government officials the discretion to assign valuable hunting concessions thus “creating conditions conducive to corruption and the use of hunting blocks for political patronage” (Nelson and Agrawal, 2008 and Leader-Williams et al. 2009, as cited in Nelson et al. 2013). There is a tendency to establish

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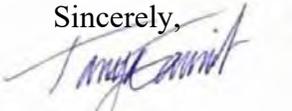
<sup>10</sup> *Panthera leo* Report of Kenya and Namibia, AC27 Doc. 24.3.3 at 7.

unsustainably high hunting quotas in order to generate funds. Such practices do not enhance the survival of lions.

## CONCLUSION

Thank you for your consideration of these additional studies and comments regarding the importation of trophies of elephants and lions from Tanzania. This letter serves as formal opposition to any application for an import permit for an elephant or lion trophy from Tanzania and HSUS, HSI, and CBD request that FWS provide at least ten days advance notification (via email, [afrostic@humaneociety.org](mailto:afrostic@humaneociety.org)) prior to the issuance of any such permits. See 50 C.F.R. §§ 17.22(e), 17.32.

Sincerely,



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International Program Legal Director  
Center for Biological Diversity



Anna Frostic  
Managing Attorney, Wildlife Litigation  
The Humane Society of the United States



Teresa M. Telecky, Ph.D.  
Senior Director, Wildlife Department  
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## The bushmeat trade in African savannas: impacts, drivers, and possible solutions

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## **Abstract**

The bushmeat trade, or the illegal acquisition and exchange of wild meat, has long been recognized as a severe problem in forest biomes, but receives little attention in savannas, perhaps due to a misconception that bushmeat hunting is a low-impact subsistence activity. Though data on impacts are scarce, indications are that bushmeat hunting is a widespread problem in savannas, with severe impacts on wildlife populations and wildlife-based land uses. The impacts of the bushmeat trade in savannas vary from edge-effects around protected areas, to disproportionate declines of some species, to severe wildlife declines in areas with inadequate anti-poaching. In some areas, bushmeat contributes significantly to food security, but these benefits are unsustainable, and hunting is

wasteful, utilizing a fraction of the wildlife killed or of its financial value obtainable through tourism, trophy hunting and/or legal game meat production. The bushmeat trade appears to be becoming increasingly commercialized due to elevated demand in rural areas, urban centres and even overseas cities. Other drivers for the trade include human encroachment of wildlife areas; poverty and food insecurity; and inadequate legal frameworks to enable communities to benefit legally from wildlife, and to create incentives for people to desist from illegal bushmeat hunting. These drivers are exacerbated by inadequate wildlife laws and enforcement and in some areas, political instability. Urgent efforts are needed to address these drivers and raise awareness among local and international governments of the seriousness of the threat. Failure to address this will result in severe wildlife declines throughout the region, with significant ecological, economic and social impacts.

**Key words:** CBNRM; community; conservation; game meat; poaching; SADC; snaring; trapping

## **1. Introduction**

The illegal bushmeat trade is recognized as a major threat to biodiversity in the forests of Central and West Africa (Fa et al., 2003), where it forms a significant component of local and even national economies (Bowen-Jones et al., 2003). Bushmeat contributes significantly to food security, often representing the most important source of protein in rural areas (Nasi et al., 2008), as well as providing a source of cash which is often used to purchase other foods and essentials during lean harvests. However, bushmeat hunting is unsustainable, causing widespread wildlife population declines and extirpation of larger-bodied species (Wilkie, 1999; Fa et al., 2000). Consequently, the current food security benefits associated with bushmeat will falter (Bennett, 2002); supplies from African forests are expected to drop by 81% over the next 50 years (Fa et al., 2003). The bushmeat trade is thus a crisis from both a conservation and human development perspective.

In contrast to the situation in forests, the bushmeat trade has received comparatively little attention in African savannas. We define African savannas as being areas that receive 300-1500 mm of rainfall annually (following Riggio et al. 2012), encompassing a broad array of habitats comprising an area of ~13.5 million km<sup>2</sup>. Lack of research focus has perhaps reflected a misconception that bushmeat hunting in savannas is typically a low impact, subsistence phenomenon (Barnett, 2000; Lindsey et al., 2011a). Literature on the bushmeat trade in savannas is limited to a review of the bushmeat trade in southern and East Africa (Barnett, 2000), and sporadic studies in Serengeti National Park (Hofer et al., 2000; Hofer et al., 2000; Loibooki et al., 2002; Marealle et al., 2010), other sites in Tanzania (Nielsen, 2006; Wilfred and MacColl, 2010), Mozambique (Fusari and Carpaneto, 2006; Lindsey and Bento, 2012), Zimbabwe (Gandiwa et al. 2012; Lindsey et al. 2011 a,b) and Zambia (Lewis and Phiri, 1998; Lewis, 2005; Brown, 2007; Lewis et al., 2011; Becker et al., 2012). While these studies demonstrate significant negative ecological impacts, the drivers, impacts and interventions needed to address the bushmeat trade in savannas are not well understood.

Lack of research and actions to address the bushmeat trade to date may reflect an under-appreciation of the problem's significance among contemporary governments, wildlife agencies, and non-governmental organizations in the region. Recently, however, the bushmeat issue received recognition that extended beyond forest biomes, when the Convention on Biological Diversity (CBD) established a liaison group on bushmeat (Secretariat of the Convention on Biological Diversity, 2011). In addition, growing concern over the impacts of the bushmeat trade in savannas catalyzed a meeting of conservation practitioners to brainstorm the issue in May 2012. This paper summarizes existing knowledge and the recommendations that emanated from the meeting.

## **2. Methods**

Participants for the meeting were selected based on known involvement in issues relating to the bushmeat trade in African countries encompassing savannas. The 29 attendees provided insights and experience from 18 African countries.

To describe the bushmeat hunting methods in savanna systems, a literature search was conducted using Web of Science® and search terms such as: bushmeat trade; bows; arrows; dogs; firearms; gin traps; hunting; poaching; snaring; trapping. The legality of hunting methods was assessed for 16 countries in the savanna biome by reviewing legislation derived from <http://faolex.fao.org/faolex/index.htm> (accessed June 2012). Information on the prevalence of various hunting methods, reasons and drivers for bushmeat hunting, and impacts on wildlife populations were gleaned from the literature and from the collective expertise, experience and data of the meeting attendees.

## **3. Bushmeat hunting and the law**

In most African countries, hunting is regulated by legal instruments, with harvests being controlled through systems of licensing and quotas. In terms of ownership, wildlife is generally either considered to be '*res nullius*' (without ownership) or belonging to the state or president. In southern Africa, however, varying degrees of ownership or user-rights are allocated to private (and in some instances, communal) landholders under conditions that vary from country to country, such as: following application for a quota (e.g. Zimbabwe, communal lands in Namibia); erection of fencing (e.g. South Africa, Botswana, Zambia); application for permits for the use of certain species (e.g. Namibia, South Africa); application for a temporary certificate of ownership (Zambia) (Barnett & Patterson, 2006; Cirelli and Morgera, 2009; Lindsey et al., In press). Using these user-rights, private land owners either hunt wildlife for their own use, or sell hunting rights to hunting operators or

tourists (Bond et al., 2004). Rights to hunt for trophies on communal and state lands are typically sold to private safari operators according to quotas (Lindsey et al., 2007). In some countries, e.g. Zambia, Tanzania, Botswana and Malawi, hunting licenses are allocated to citizens to hunt for meat, and in some scenarios subsistence hunting is allowed without a permit on certain categories of land (e.g. Malawi, Angola and Mozambique) (Cirelli and Morgera, 2009).

Hunting laws typically stipulate restrictions on the times of year that hunting is permitted, prohibitions on hunting in certain protected areas, hunting certain species, young or pregnant animals, on the use of certain hunting methods and without permits (Table 1) (Cirelli and Morgera, 2009). Hence, bushmeat hunting is illegal in most contexts within which it occurs, due to contravention of one or more of these restrictions. The meat obtained from illegal hunting is referred to as “bushmeat” to prevent confusion with legal harvest of wildlife for “game meat”.

#### **4. Bushmeat hunting methods**

Snares are the most common method used by bushmeat hunters (Table 2). Snares typically comprise a noose, usually attached to trees along trails (Hofer et al., 1996). Animals are caught when they put their head (or a leg) into the snare and pull it tight (Noss, 1998). Snares can be made from natural fibre, nylon or wire. Increasingly wire for snares is widely available from telephone and electricity lines, fencing, bicycle brakes and burnt tyres (Hofer et al., 1996; Lindsey et al., 2011a; Becker et al. 2012). Snares are cheap, difficult to detect and can cause rapid declines in wildlife populations (Lindsey et al., 2011a). They can catch species ranging from rodents to elephants (*Loxodonta africana*) depending on the snare size and material (Hofer et al., 1996; Noss, 1998; Hofer et al., 2000). Snares are unselective and frequently kill non-target animals (Lindsey et al., 2011a; Becker et al., 2012). Because of the low value of snares, hunters often check them infrequently, causing wastage (Noss, 1998). For example, in Zimbabwe’s Savé Valley Conservancy, at least 1,410 animals

Table 1. The legality of various bushmeat hunting methods in 15 African countries <sup>a</sup>

Country	Fire	Snares	Poison	Automatic weapons	Dogs	Nets	Traps	Reference
Benin	0	0	0	0	0	0	0	Loi n° 87-014 portant réglementation de la protection de la nature et de l'exercice de la chasse en République Populaire du Bénin
Burkina Faso	0	0	0	0	1	1	0	Décret N 96-061, portant réglementation de l'exploitation de la faune. Loi N 006/97/ADP du 31 janvier 1997 Portant Code Forestier
Cameroon	0	?	0	0	0	0 <sup>b</sup>	1	Loi n° 94/01 portant régime des forêts, de la faune et de la pêche (20 January 1994) ; Décret n° 95-466 fixant les modalités d'application du régime de la faune
Central African Republic	0	0	0	0	0	0	0	Ordonnance No. 84.045, portant protection de la faune sauvage et réglementant l'exercice de la chasse
Chad	0	0	0	0	0	0	0	Ordonnance n° 14-63 du 28 mars 1963 réglementant la chasse et la protection de la nature
Botswana	0	0	0	0	1	0	0	Wildlife Conservation and National Parks Act, 1992
Mozambique	0	0	0	0	1	0	0	Forest and Wildlife Act (No. 10/1999)
Namibia	0	0	0	0	0	0	0	Namibia Nature Conservation Ordinance, 1975
Niger	0	0	0	0	0	0	0	Loi N° 98-07 du 29 avril 1998 fixant le Régime de la Chasse et de la Protection de la Faune
Senegal	0	0	0	0	0	0	0	Code de la chasse et de la Protection de la faune. Loi N 86-04 du janvier 1986. Décret N 86-844 du juillet 1986
South Africa	0	?	0	0	0	0	0	Threatened and Protected Species regulations, 2006
Sudan	0	0	0	0	0	0	0	Wildlife Conservation and National Parks Act, 2003
Tanzania	0	0	0	0	0	0	0	Wildlife Conservation Act, 2009
Zambia	0	0	0	0	0	0	0	Zambia Wildlife Act, No.12 of 1998
Zimbabwe	0	0	0	0	1	0	0	Trapping of Animals (Control) Act (2002)
Average	0	0	0	0	0.27	0.13	0.6	

<sup>a</sup> The legality of hunting with single-shot firearms, muzzle-loading firearms, shot guns and bows and arrows is more complex as these methods are legal under some circumstances in some countries, albeit when in possession of the necessary permits and in some cases given specific calibres/bow strengths for particular species.

<sup>b</sup> 'Modern' nets prohibited

rotted in snares during 2001-2009 (Lindsey et al., 2011a). Finally, there are animal welfare issues associated with snares as they cause slow deaths and high rates of non-fatal wounding (Noss, 1998).

Dogs are often used by hunters to bay wildlife (Jachmann, 2008a; Grey-Ross et al., 2010) (Table 2). In some areas firearms are used, though automatic weapons are rarely used (Fusari 2001; Brown, 2007). In Mozambique, bushmeat hunters commonly use gin traps manufactured from vehicle leaf-springs to kill animals as large as buffalo *Syncerus caffer* and elephant (Fusari 2001; Lindsey & Bento 2012). Fire is used by hunters to flush wildlife, clear undergrowth, increase visibility, stimulate green-growth which concentrates wildlife, and cover tracks (Lindsey and Bento, 2012).

## **5. Spatial and temporal patterns in bushmeat hunting**

With wildlife disappearing from unprotected lands (Newmark, 2008), illegal hunters are increasingly focusing their efforts on protected areas. Within protected areas, bushmeat hunting is more prevalent close to the borders and near human settlements (Muchaal and Ngandjui, 1999; Hofer et al., 2000; Wato et al., 2006; Marealle et al., 2010). Greater distances mean increased time, effort and costs for hunters to find wildlife and transport meat, and higher risk of apprehension (Hofer et al., 2000). Bushmeat hunters typically focus efforts in areas where wildlife concentrates, such as near water, game trails, green-flushes or flowering/fruited trees (Lindsey and Bento, 2012; Becker et al., 2012).

There are consistent temporal patterns in bushmeat hunting, with peaks in the late dry season when wildlife concentrates around water (Brown, 2007; Holmern et al., 2007; Lindsey et al., 2011a), and following poor crop harvests (Lindsey et al., 2011a), and lulls during peak agricultural activity when hunters are often otherwise occupied (Knapp, 2007; Brashares et al., 2011). In the Serengeti, bushmeat hunting increases during the wildebeest (*Connochaetes taurinus*) migration (Holmern et

Table 2. The prevalence of methods used to hunt wildlife for bushmeat in savanna Africa (NB that in cases where information was sourced from literature, it may be the case that some hunting methods are used in the study areas but were not mentioned in the papers by the authors)

Area	Snares	Firearms	Dogs	Fire	Bows & arrows	Gin traps	Nets	Small mammal /bird traps	Pit fall traps	Source
Hunting concessions near Okavango, Botswana	1	1	1	1	0	0	0	0	0	K. Collins, unpublished data
Tsavu National Park, Kenya	1	0	0	0	0	0	0	0	0	(Wato et al., 2006)
Sokoike Forest, Kenya	0	0	1	0	1	0	0	1	0	(Fitzgibbon et al., 1995)
WAP complex, Benin, Burkina Faso, Niger	0	1	0	1	0	1	0	0	0	P Henschel unpublished data
Comoé NP, Ivory coast	0	1	0	1	0	1	0	0	0	P Henschel unpublished data
Batéké Plateau, SE Gabon	1	1	1	1	0	0	1	1	0	P Henschel unpublished data
Gile Game Reserve, Mozambique	1	0	0	1	0	1	1	0	0	(Fusari and Carpaneto, 2006)
Coutada 9, Mozambique	1	1	0	1	1	1	0	0	0	(Lindsey and Bento, 2012)
Niassa, Mozambique	1	1	1	1	0	0	1	1	1	C. Begg, unpublished data
Pafuri, South Africa	1	0	1	0	0	1	0	0	0	C. Roche, unpublished data
Dwesa / Cwebe Reserves, RSA	1	1	1	0	0	0	0	0	0	(Hayward, 2009)
Munyawana Game Reserve, RSA	1	1	1	0	0	0	0	0	0	J. Mattheus unpublished data
Ruaha ecosystem, Tanzania	1	1	1	0	1	1	0	1	0	A. Dickman unpublished data
Serengeti National Park, Tanzania	1	0	1	1	1	0	0	1	1	D. Rentsch unpublished data
North western Tanzania	1	1	0	1	1	0	0	0	0	(Jambiya et al., 2007)
North Luangwa National Park, Mukungule, Munyamadzi, and W/E Musalangu game management areas	1	1	0	0	0	0	0	0	0	(van der Westhuizen, 2007)
South Luangwa National Park, Upper and Lower Lupande, and Sandwe game management areas, Zambia	1	1	1	0	0	0	0	0	0	D. Lewis, R. McRobb, unpublished data, (Becker et al., In press)
Kafue National Park, Zambia	1	1	0	1	0	0	0	0	0	N.Midane, unpublished data
Private conservancies, Zimbabwe	1	0	1	0	1	0	1	0	0	(Lindsey et al., 2012)
Gonarezhou National Park, Zimbabwe	1	0	1	1	1	0	1	0	0	H. van der Westhuizen, unpublished data, Gandiwa 2011
Average	0.85	0.65	0.6	0.55	0.35	0.3	0.25	0.25	0.1	

al., 2007). Hunters using dogs are most active during moonlight when it is easy to see, and on rainy nights (Lindsey et al., 2011a; J. Mattheus, pers. comm.).

## **6. Scale of the bushmeat trade**

Sporadic (though largely meaningless) insights into the volumes of bushmeat traded are provided in the literature. For example; in Tanzania, 2,078 tonnes of bushmeat are confiscated annually with a value of >US\$50 million; in Central African Republic, an estimated 59,000 tonnes of bushmeat are sold illegally each year; and in Mozambique 182,000–365,000 tonnes are consumed annually, with an economic value of US\$365-730 million/year (Barnett, 2000; Secretariat of the Convention on Biological Diversity, 2011). The authors quoting those figures do not indicate whether those quantities are traded on a once off or ongoing basis, or shed light into trends in the scale of the trade. Accurately quantifying the amount of wildlife hunted or the quantity bushmeat traded is extremely difficult given the illicit nature of the activities and lack of research on the topic in savannas.

## **7. Impact of bushmeat hunting**

### *7.1 Ecological impacts*

Wildlife populations are declining in most African countries (Craigie et al., 2010; Scholte, 2011) and bushmeat hunting is a key contributor. In Kenya and Zambia, for example, bushmeat hunting has emerged as the primary threat to wildlife (Barnett, 2000; Okello and Kiringe, 2004). From our sample of 25 case studies (which often incorporate multiple sites, and providing insights from 14 countries), the impacts of bushmeat hunting on wildlife appear to fall into three categories (Table 3).

Table 3. Impacts on illegal hunting observed in multiple sites from the literature and a survey of n=12 attendees at a bushmeat meeting

Area	Edge-effects	Pronounced impacts on particular species	Catastrophic population declines	Notes	Source
Comoé NP, Ivory coast	1	1	1	- Near-collapse of populations of large mammals. Near extinction of buffalo, elephant and hippo	P. Henschel, unpublished data
Batéké Plateau, SE Gabon	1	1	1	- Decline in large ungulates, local extinction of waterbuck, reedbuck, lions and spotted hyaena (due to loss of their prey base)	P. Henschel, unpublished data
Private conservancies, SE Zimbabwe	1	1	1	-Near eradication of wildlife in areas settled during land reform and declining populations in adjacent areas, local extinction of wild dogs in several areas	(Lindsey et al., 2011a)
Gonarezhou National Park, Zimbabwe	1	1	1	- Wildlife population densities lower in areas adjacent to settlement within the park, suppressed lion population	H. Van der Westhuizen unpublished data
Pafuri, RSA	1	1	1	- On taking over the concession, illegal hunting had reduced wildlife populations to the point that a reintroduction of impala and zebra was deemed necessary to supplement remaining populations. Lions were entirely absent from the concession.	C. Roche, unpublished data
Coutada 9, Mozambique	1	1	1	- Reduced wildlife densities close to human settlements	(Lindsey and Bento, 2012)
Niokolo Koba National Park, Senegal	1	1	1	Five large mammal species have been extirpated (including endangered African wild dogs), wildlife densities reduced by >90%	(Renaud, 2011)
Kafue National Park, Zambia	1	1	0	- Ungulate populations declined by 66-97%, reduced densities close to edges, large species most affected	N. Midlane, unpublished data
South Luangwa National Park, Zambia	1	1	0	- Declining populations in areas close to human settlements, close to boundary of park, declining eland, buffalo and puku populations, strong edge effects from illegal hunting on large carnivores and herbivores	R. McRobb, M. Becker, D. Lewis unpublished data
Hunting concessions near Okavango, Botswana	1	1	0	- Declining populations near human settlements, declining giraffe, impala, wildebeest, lechwe populations	K. Collins, unpublished data
Village land around Ruaha National Park, Tanzania	1	1	0	- Declining large carnivore populations	A. Dickman unpublished data
Serengeti National Park, Tanzania	1	1	0	- Resident ungulates locally extirpated in some areas, reduced densities close to boundaries, 78,000-110,000 migratory wildebeest killed annually, skewed gender ratios in impala and giraffe	(Hofer et al., 2000)(Nyahongo et al., 2005)(Ndibalema and Songorwa, 2008)(Marealle et al., 2010)
WAP complex, Benin, Burkina Faso, Niger	1	0	1	- Major population declines have occurred in parts of the complex with weak law enforcement	P. Henschel, unpublished data
Niassa Reserve, Mozambique	0	1	0	- Low densities of lion with low litter sizes and instability in prides, rapid turnover in leopard populations, low densities of wildlife around villages.	C.Begg Unpublished data)
Dwesa / Cwebe Reserves, RSA	0	1	0	- Local extinction of red hartebeest, decline in zebra, wildebeest and white rhinoceros populations	(Hayward, 2009)
Private farms, Kwa-Zulu Natal, RSA	0	1	0	- Declining populations of oribi in some areas	(Grey-Ross et al., 2010)
Soko Forest, Kenya	1	0	0	- Large ungulate populations reduced to low densities throughout reserve, the density of small mammals has been reduced for 1-2 km from the boundary	(Fitzgibbon et al., 1995)(Fitzgibbon et al., 1995)(Fitzgibbon et al., 1995)(Fitzgibbon et al., 1995)(Fitzgibbon et al., 1995)
Niassa Reserve, Mozambique	1	0	0	- Reduced wildlife densities close to human settlements in the reserve, and generally depressed densities throughout the reserve	C. Begg, unpublished data
North Luangwa National Park,	1	0	0	- Reduced wildlife densities close to the reserve boundary	(van der Westhuizen, 2007)

Zambia					
North western Tanzania	0	0	1	- Wildlife populations in Burigi and Biharamulo Game Reserves were reduced to less than 10% of their former numbers largely through illegal exploitation by refugees and local populations	(Jambiya et al., 2007)
Ranches in the Kalahari ecoregion of north western Zimbabwe	0	0	1	- Reductions of wildlife populations of up to 90% due to excessive harvests to supply the bushmeat trade following the settlement of ranches during land reform	(du Toit, 2004)
Agricultural farms on the Zimbabwe central plateau	0	0	1	- Dramatic declines (50-60%) in antelope populations during the 1-2 years following the land reform programme, due to excessive off-takes for the bushmeat trade, 50% loss of national tsessebe population	(du Toit, 2004)
Game management areas, Zambia	0	0	1	- 24 out of 36 game management areas (which collectively cover 170,000 km <sup>2</sup> ) are 'under-stocked' or 'depleted', due primarily to illegal bushmeat hunting	(Simasiku et al., 2008)
Northern Central African Republic	0	0	1	94% decline in large mammal populations over 30 years, across an area of 95,000 km <sup>2</sup>	(Bouché et al., 2012)
Gorongosa National Park, Marromeu				90-100% population declines due to hunting for bushmeat and trophies during and after the civil war, several other reserves severely depleted but lacking 'before' data to make quantitative assessments	(Hatton et al., 2001)
Buffalo Reserve, Mozambique	0	0	1		
Average	0.64	0.60	0.56		

a) *Edge-effects*, including reduced effective park sizes and depressed wildlife densities close to human settlements (recorded in 64% of case-studies) (Table 3). Impacts of bushmeat hunting are exacerbated by the use of fire by hunters, which reduce dry-season grazing, and force wildlife from protected areas in search of grazing.

b) *Disproportionate impacts on particular species*, which can have severe consequences for ecosystem services (e.g. seed dispersal and predation) (Wright et al., 2007; Brodie et al., 2009). Such impacts were recorded in 60% of case-studies (Table 3). Large species are generally targeted by bushmeat hunters, and declining populations are reflected in their waning prevalence in bushmeat markets (Barnett, 2000). Wide-ranging predators are particularly affected by snaring, because they are attracted to carcasses of trapped animals and are also impacted by declining prey populations (Table 3).

c) *Dramatic, generalized wildlife population declines* have occurred at a number of sites where large-scale bushmeat hunting has been allowed to proceed in the absence of effective law enforcement (Table 3). For example, wildlife populations in Central and West African savannas are collapsing due to excessive bushmeat hunting (Fischer and Linsenmair, 2001; Renaud, 2011; Bouché et al., 2012) (Table 3). In some countries, vast wildernesses exist where wildlife has been depleted, and empty savannas are as real as 'empty forests' (Redford, 1992; Bouché et al., 2012). In Zambia, for example, wildlife populations have been severely depleted in 70% of game management areas (comprising 170,000 km<sup>2</sup>), largely through excessive bushmeat hunting (Simasiku et al., 2008). In some areas bushmeat hunting represents a more severe threat than habitat loss (Wilkie et al., 2011), and the two issues often act synergistically, with severe ecological consequences (Ogutu et al., 2009; Wilkie et al., 2011).

Available data preclude rigorous quantification of the ecological impact of bushmeat beyond that allowed for by the available case-studies. However, we are confident that the case-studies in Table 3 represent a tiny fraction of the areas in savannas that are severely impacted by bushmeat hunting.

Furthermore, one can expect the impacts to increase in future: as wildlife disappears from human-dominated landscapes, off-takes will focus increasingly on protected areas, resulting in greater proportional impacts on those populations. The scale and apparent ubiquity of the threat posed by bushmeat hunting suggests that without urgent intervention, wildlife resources will be lost in many areas with severe economic and social impacts in addition to the ecological implications.

### *7.2 Economic and social impacts*

Bushmeat hunting can reduce the viability of and even preclude wildlife-based land uses. Trophy hunting is financially unviable in many concessions (18.8-92.3% depending on the country) due to bushmeat hunting (Lindsey et al., 2012). For example, bushmeat hunting reduced trophy hunting income by 96% in Coutada 9 (Mozambique), by 67% in Burigi and Biharamulo Game Reserves in Tanzania, and by US\$1.1 million per year in Savé Valley Conservancy (Jambiya et al., 2007; Lindsey et al., 2011a; Lindsey and Bento, 2012). Ecotourism operations are even more sensitive to bushmeat hunting as they require higher densities of wildlife (Wilkie and Carpenter, 1999). For example, in the Makuleke concession of Kruger National Park, ecotourism operators incurred losses for the first six years of operation as wildlife recovered from previously high levels of bushmeat hunting (which was reflected by the removal of >2,000 snares during the first two years of operations) (C. Roche, pers. comm.).

Social consequences of illegal bushmeat trade include negative impacts on food security in the long term through the loss of a potentially sustainable and greatly elevated supply of meat protein through legal wildlife-based land uses, the loss of tourism-based employment and the loss of wildlife heritage. In some cases, bushmeat hunting is done primarily by communities living away from wildlife populations, with the effect that the people bearing the costs of living with wildlife are not those who benefit from bushmeat (van der Westhuizen, 2007).

## 8. Bushmeat hunters and traders

Hunting is an almost exclusively male activity, though women often butcher meat (Brown, 2007; Lindsey et al., 2011b). Where hunting grounds are distant from hunters' homes, meat carriers are employed (Brown, 2007). In many cases, bushmeat hunters are poor, unemployed, with little education and few livestock (Loibooki et al., 2002; Knapp 2007; Lindsey et al., 2011b). Bushmeat hunting can be lucrative, however, and in Tanzania, hunters are wealthier than non-hunters (Knapp, 2007). Similarly, in Zambia, some hunters earn nearly US\$100 from a single expedition, which approaches the mean per capita annual income for citizens of US\$120, and hunters are among the wealthiest community members (Brown, 2007). In some cases, hunters enjoy elevated social status as a result of their profession (Brown, 2007) and are preferred by women (D. Rentsch unpublished data).

Bushmeat hunting is rarely practised purely for subsistence and operates on a continuum from provisioning meat for local consumption and trade, up to providing meat for urban or even international markets (Brashares et al., 2011) (Table 4). In several southern and East African countries, well-developed and complex rural-urban trade supply networks exist (Barnett, 2000). Outlets for the sale of bushmeat, such as open-air markets, chop-bars and butcheries, have arisen in some areas, and full-time commercial bushmeat traders occur in most southern and East African countries (Barnett, 2002). In the Serengeti area for example, 34.3% of traders rely on bushmeat as their sole source of income, and sell meat up to 200 km away (Barnett, 2000). In central Mozambique, middlemen purchase bushmeat from hunters to re-sell in urban centres (Lindsey and Bento, 2012). Bushmeat is dried or smoked for preservation, and transported to urban markets via foot, bicycle, vehicle or train (Edderai and Dame, 2006; Lindsey et al., 2011a).

Table 4. The most common reasons for bushmeat hunting in various savanna sites in Africa

Area	Own use	Local commercial trade	Commercial trade to urban areas	For body parts for traditional medicine / ceremonies	Prestige of hunting /social status	Sport	Source
Hunting concessions near Okavango, Botswana	0	1	1	0	0	0	K. Collins, unpublished data
WAP complex, Benin, Burkina Faso, Niger	0	1	1	1	0	0	P Henschel unpublished data
Comoé NP, Ivory coast	1	0	1	1	0	0	P Henschel unpublished data
Batéké Plateau, SE Gabon	1	1	1	0	0	0	P Henschel unpublished data
Sokoke Forest, Kenya	1	1	0	0	0	0	Fitzgibbon 2005
Gile Game Reserve, Mozambique	1	1	1	0	0	0	Fusari & Carpaneto 2006
Coutada 9, Mozambique	1	1	1	1	0	0	Lindsey & Bento 2012
Niassa Reserve, Mozambique	1	1	0	1	0	0	C. Begg, unpublished data
Pafuri, RSA	1	1	0	1	0	0	C. Roche, unpublished data
Various reserves, RSA	1	1	0	0	0	1	Warchol & Johnson 2009
Private farms, Kwa-Zulu Natal, RSA	1	0	0	0	0	1	Grey-Ross et al. 2010
Ruaha ecosystem, Tanzania	1	1	1	0	1	0	A. Dickman, unpublished data
Serengeti National Park, Tanzania	1	1	1	1	1	0	Hofer 2000; Barnett 2002; Ndibalema & Songorwa 2002; Nyahongo et al. 2005; D. Loibooki et al. 2002; Rentsch unpublished data
North western Tanzania	1	1	0	0	0	0	Jambiya et al. 2007
Kafue National Park, Zambia	1	1	1	0	0	0	N. Midlane, unpublished data
North Luangwa National Park, Mukungule, Munyamadzi, and W/E, Musalangu game management areas	1	1	1	1	1	1	Van der Westhuizen, 2007
South Luangwa National Park, Upper and Lower Lupande, and Sandwe game management areas, Zambia	1	1	1	1	1	0	D. Lewis, R. McRobb, M. Becker, unpublished data, (Becker et al., In press)
Private conservancies, SE Zimbabwe	1	1	0	1	0	0	Lindsey et al. 2011
Gonarezhou National Park, Zimbabwe	1	1	1	1	0	0	H. van der Westhuizen unpublished data
Average	0.90	0.90	0.60	0.50	0.17	0.17	

The price of bushmeat is related to distance from harvestable wildlife populations (Brashares et al., 2011), with prices relative to alternatives (livestock, poultry, and fish) significantly higher in urban (by  $1.57 \pm 0.28$  times [mean  $\pm$  S.E.],  $n=10$  published studies) than rural areas (where prices are  $0.72 \pm 0.07$  those of alternatives,  $n=19$ ) (Mann Whitney Test,  $U=21.0$ ,  $p<0.01$ ). Bushmeat transported  $\geq 90$  km from its source costs almost 50% more than fish and chicken (Brashares et al., 2011). Correspondingly, hunters operating close to urban centres sell more of their catch than distant hunters (Brashares et al., 2011). Rural consumers typically select bushmeat over alternatives because it is cheaper or more available (78.5% of buyers,  $n=12$  published studies), whereas urban consumers select it for its taste (100% of buyers,  $n=5$  sites) (Fisher's Exact Test,  $p<0.01$ ).

## **9. Drivers of bushmeat hunting and trade**

### **9.1 Increasing demand for bushmeat**

Human populations are growing faster in Africa than elsewhere, high population densities occur close to wildlife populations in some areas, urban populations in African cities are becoming wealthier and there are increasing African populations in international cities, resulting in elevated demand for bushmeat from multiple markets. Bushmeat comprises a small proportion of the protein consumed by urban societies (e.g. 2% in Gabon), but the large human populations involved mean that demand for the commodity is significant (Wilkie et al., 2011). There are significant inflows of bushmeat into Europe and the US, where it is sold for elevated prices (Chaber et al., 2010). Such demand is driving increased commercialization of trade, greater numbers of hunters, erosion of traditional hunting seasons and taboos (which meant that certain species were spared in some areas and that some cultures eschewed hunting), and the adoption of more effective hunting techniques, placing unprecedented pressure on wildlife populations (Barnett, 2000; Stiles, 2011).

## 9.2 Increasing human encroachment of wildlife areas

Growing human populations are increasingly encroaching wildlife areas (Kiringe et al., 2007), driving elevated bushmeat hunting (Table 5). For example, various categories of protected areas in Ethiopia, Mozambique, Tanzania and Zambia are increasingly settled (Simasiku et al., 2008; Lindsey and Bento, 2012). Human population growth rates are high on the boundaries of protected areas and may even be higher in such areas than elsewhere (Wittemyer et al., 2008) (though that postulation is contested (Joppa et al., 2009)). In Zambia, for example, population growth rates in game management areas are higher than the mean in some cases (e.g. 4.1% in Mambwe District, which encompasses two GMAs c.f. 2.8% for Zambia as a whole) (Zambia Central Statistical Office, 2011).

Human encroachment can be greatly exacerbated by poorly planned infrastructure such as roads, clinics, schools and boreholes in or close to wildlife areas (van der Westhuizen, 2007; Dobson et al., 2010). Though well-intentioned, such developments tend to result in influxes of people into areas poorly suited to human settlement, creating dependency on exploitation of natural resources such as wildlife. In some cases, human influxes may be the result of failure of different government ministries to communicate effectively and plan in a coordinated fashion. For example, human encroachment has been worsened through efforts to control tsetse flies (*Glossina* spp.) which has enabled livestock-keeping and subsequent settlement in previously unfavourable areas (Muriuki et al., 2005). Similarly, encroachment of wildlife areas is exacerbated by forestry and mining, which increase the prevalence of bushmeat hunting due to road construction and human influxes (Clark et al., 2009; Poulsen et al., 2009). Logging companies often perceive bushmeat as a free commodity with which to supplement workers' income (Wilkie et al., 2011). The frequency of bushmeat hunting and rate of bushmeat consumption declines with distance from human settlements (Hofer et al.,

Table 5. Drivers for illegal hunting and the bushmeat trade in the savanna biome (NB that where information was extracted from literature, the lack of mention of some drivers does not necessarily mean those drivers are not in play in those areas)

	Inadequate enforcement	Money making opportunity	Protein shortages	Poverty/lack of alternative livelihoods/employment	Weak penal systems	Corrupt game scouts/employees	Human influxes / population increase	Livestock held as assets/lack of livestock	Lack of benefits from wildlife
Hunting concessions near Okavango, Botswana <sup>1</sup>	1	1	0	0	1	1	0	1	0
WAP complex, Benin, Burkina Faso, Niger <sup>2</sup>	1	1	0	0	1	1	0	0	0
Comoé NP, Ivory coast <sup>3</sup>	1	1	0	1	0	0	0	0	0
Batéké Plateau, SE Gabon <sup>3</sup>	1	1	1	1	0	0	0	0	0
Sokoke Forest, Kenya <sup>3</sup>	0	0	1	0	0	0	0	0	0
Protected areas in Kenya <sup>4</sup>	1	1	1	1	1	0	1	0	0
Gile Game Reserve, Mozambique <sup>5</sup>	1	1	1	1	0	0	1	0	0
Coutada 9, Mozambique <sup>6</sup>	1	1	1	1	1	1	1	1	1
Niassa Reserve, Mozambique	1	1	1	1	1	1	1	1	1
Pafuri, RSA <sup>7</sup>	1	1	1	1	1	0	0	1	0
Various reserves, RSA <sup>8</sup>	1	1	1	1	1	1	0	1	1
Private farms, Kwa-Zulu Natal, RSA <sup>9</sup>	1	0	1	1	1	1	0	0	0
Kilombero, Tanzania <sup>10</sup>	1	0	0	0	0	0	0	0	1
Ruaha ecosystem, Tanzania <sup>11</sup>	1	1	1	1	1	1	1	0	1
Serengeti National Park, Tanzania <sup>12</sup>	1	1	1	1	1	1	1	1	1
North western Tanzania <sup>13</sup>	1	1	1	1	1	0	1	0	0
Kafue National Park, Zambia <sup>14</sup>	1	1	1	1	1	1	1	1	1
North Luangwa NP, Mukungule, Munyamadzi, and W/E Musalangu game management areas <sup>15</sup>	0	1	1	1	0	0	0	0	1
South Luangwa National Park, Upper and Lower Lupande, and Sandwe game management areas, Zambia <sup>16</sup>	1	1	1	1	1	0	1	1	1
Savé Valley Conservancy, Zimbabwe <sup>17</sup>	1	1	1	1	1	1	1	1	1
Gonarezhou National Park, Zimbabwe <sup>18</sup>	1	1	1	1	1	1	1	1	1
Average	0.90	0.86	0.81	0.81	0.71	0.52	0.52	0.48	0.52

<sup>1</sup> K. Collins, unpublished data; <sup>2</sup> P. Henschel, unpublished data; <sup>3</sup> (Fitzgibbon et al., 1995); <sup>4</sup> (Saru, 2012); <sup>5</sup> (Fusari and Carpaneto, 2006); <sup>6</sup> (Lindsey and Bento, 2012); <sup>7</sup> C. Roche, unpublished; (Warchol and Johnson, 2009) data; <sup>10</sup> (Haule et al., 2002); <sup>11</sup> A. Dickman, pers. comm.; <sup>12</sup> Hofer 2000, Barnett 2002,

1996; Muchaal and Ngandjui, 1999; Brashares et al., 2011; Lindsey et al., 2011a) and wildlife populations fare better where human settlement is not permitted (Stoner et al., 2007).

### **9.3 Poverty and food insecurity**

Rural African communities suffer high levels of unemployment and poverty (Brown, 2007), and the quick income possible from selling meat is a common incentive for bushmeat hunting (Table 5).

Individuals with part-time or seasonal employment allocate more time to hunting than those with full-time jobs (Brashares et al., 2011). Lands where wildlife persists are frequently poorly suited to agriculture and food shortages prevail. Reliance on bushmeat is created by shortages of alternative proteins and carbohydrates (as meat is often traded for grain (Lindsey et al., 2011b)) (Table 5).

Demand for bushmeat is exacerbated in some areas by diseases such as trypanosomiasis and Newcastle's disease which preclude or reduce livestock production (Lewis, 2005). Furthermore, communities often retain livestock as assets and use bushmeat for daily protein needs (Barnett, 2000). Consequently, bushmeat contributes significantly to food security in many areas (Nyahongo et al., 2005). Around the Serengeti, bushmeat comprises 31% of meat consumed (D. Rentsch, unpublished data). However, declining wildlife populations in many areas mean that the contribution of bushmeat to food security will wane without interventions to make harvests sustainable.

### **9.4 Lack of clear rights over wildlife or land**

In many countries, communities lack rights over their land or the wildlife that they live with, meaning that bushmeat hunting is the only way they can access benefits from wildlife. In some places, efforts have been made to remedy this situation via devolution of user-rights over wildlife to communities and development of community-based natural resource management (CBNRM)

programmes. However, in most cases (e.g. Botswana, Tanzania, Zambia and Zimbabwe), governments retain significant proportions of revenue from wildlife and incentives for conservation are weak (Suich et al., 2009). Marginalizing local people from benefits of wildlife can create strained relations with the wildlife sector, which are often worsened by human-wildlife conflict, heavy-handed anti-poaching and historical grievances over land. In such instances, bushmeat hunting may be a form of protest (Holmes, 2007).

## **10. Contributing factors that facilitate the bushmeat trade**

### **10.1 Inadequate legal protection for wildlife, law enforcement or penal systems**

In many countries, gazetted punishments for bushmeat hunting are inadequate and do not reflect the value of wildlife (Barnett, 2000). Penalties typically comprise warnings, community service or fines of lower value than the meat obtained from bushmeat hunting (Barnett, 2000), and in many cases, bushmeat hunters are not convicted at all. For example, 60 hunters were arrested in the NG26 concession in Botswana from 2010-2012, but none were convicted (K. Collins, pers. comm.). Due to poor record-keeping, magistrates often fail to consider the criminal history of bushmeat hunters, so first-time and repeat offenders receive similarly weak punishments (V. Opyene, unpublished data). Wildlife laws are not harmonized among neighbouring countries, which can create loopholes and encourage cross-border poaching (V. Opyene, unpublished data). Wildlife offences are typically granted much lower priority than those involving livestock, despite the fact that the wild animals killed often have a much higher value, prejudicing the development of wildlife-based land uses (Lindsey et al., 2011a).

Many governments lack the will, and most state wildlife agencies lack the necessary resources or expertise to enforce laws effectively (Manousrian and Dudley, 2008) (Table 5). The Zambia Wildlife

Authority (ZAWA), for example, has a force of 1,179 scouts to protect a wildlife estate of ~233,000 km<sup>2</sup> (ZAWA, pers. comm.). Consequently, the risk of bushmeat hunters being caught is low in many places. In the Serengeti, for example, <1% of illegal hunters are apprehended (Loibooki et al., 2002). In some cases, protected areas are simply overwhelmed by the scale of the threat; for example, ~9,600 poachers were arrested in two months following establishment of refugee camps in Tanzania in the mid-1990s, 7,480 of whom escaped from custody (Jambiya et al., 2007).

The efficacy of anti-poaching is often undermined by poor morale resulting from low salaries, corruption, and lack of equipment and supervision (Lindsey et al., 2011a). Scouts are sometimes bribed by bushmeat hunters to turn a blind-eye, and scouts themselves sometimes poach (Lindsey et al., 2011a). In Mozambique, police and local government officials (those responsible for penalizing bushmeat hunters) often buy bushmeat (Lindsey and Bento, 2012) and in Central Africa, government officials sometimes pay poachers to hunt elephants for ivory, who then accrue the meat for sale (Stiles, 2011).

## **10.2 Political instability**

Bushmeat hunting typically increases during periods of political instability due to a breakdown in law enforcement and reduced availability of alternative food. This was observed on wildlife ranches in Zimbabwe during land 'reform', in North West Tanzania following the establishment of refugee camps, and in Mozambique, Democratic Republic of Congo and Central African Republic during periods of armed conflict (de Merode et al., 2007; Bouché et al., 2012).

### **10.3 Demand for wildlife body parts for traditional use**

Wildlife body-parts are often used for traditional medicines and cultural practises, and the sale of such items can increase the profitability of bushmeat hunting. For example, the skins of spotted carnivores such as leopards (*Panthera pardus*) and genets (*Genetta* spp.) fetch high prices (e.g. US\$83-\$2,500 for leopard skins in Mozambique, C. Begg, unpublished data). In addition expanded trade of wildlife parts such as the recent practice of selling lion (*Panthera leo*) as tiger (*Panthera tigris*) bones in Asian markets is an indication that such trade may increase in future (Lindsey et al., 2012).

### **10.4 Abundant material for making snares**

Controlling bushmeat hunting is made difficult in some areas due the abundance of wire which is used to make snares. In Zambia, the electricity supply corporation has increased wire availability in rural areas during expansion of the national grid, particularly in areas with expanding wildlife-based tourism economies (Becker et al., 2012). In Savé Valley Conservancy, most of the >84,000 snares removed during 2002-2009 were made from wire from the perimeter fence (Lindsey et al., 2012). Where wire is scarce, illegal hunters are forced to use materials (e.g. gin traps) that are easier to control and harder to replace (Lindsey and Bento, 2012).

## **11. Potential solutions and associated challenges**

### **11.1 Land use planning**

Creating distance or minimizing the interface between people and wildlife is a key means of reducing bushmeat hunting (Lindsey et al., 2011a). Developing and maintaining large protected areas is

essential as there is a positive relationship between reserve size and retention of wildlife diversity (Newmark, 2008). Effective reserve size can be increased in some cases by creating transfrontier protected areas (Newmark, 2008). Gazetting semi-protected areas and promoting of wildlife-based land uses adjacent to reserves can create buffers, help conserve critical habitats and reduce edge-effects (Stokes et al., 2010). Where human settlement in reserves is prohibited, enforcing such prohibitions is crucial. Furthermore, human movement through and within parks should be controlled, as livestock grazing and resource collection are used as covers for bushmeat hunting (Lindsey and Bento, 2012; H. van der Westhuizen unpublished data). Where human settlement in reserves is permitted/tolerated, land zoning can help reconcile conservation and human needs (Naughton-Treves et al., 2005). Zoning can help protect wildlife areas and encourage agencies to focus human development initiatives in defined settlement and agricultural areas. Zoning has been implemented in Coutada 9 in Mozambique, resulting in reduced bushmeat hunting and recovering wildlife populations (Lindsey and Bento, 2012).

Fencing can assist land-use planning, limit edge-effects in habitat fragments and reduce bushmeat hunting by reducing wildlife movement from and human incursion into reserves (Lindsey et al., 2012). Fences demarcate reserves and emphasize the illegality of entering and hunting therein (Hayward, 2009). Fences can also assist anti-poaching as the cleared ground maintained within fence lines enables detection of human incursion (Lindsey et al., 2012). Fences can also sometimes reduce human-wildlife conflicts, thereby improving relations between the wildlife-sector and adjacent communities (Lindsey et al., 2012).

Careful positioning of infrastructure development can discourage human influxes into wildlife areas. Similarly, other land uses that occur within wildlife areas require careful management. When allocating forestry rights, for example, governments should ensure that concessions are large and contain patches of unlogged forest (Clark et al., 2009). Care is required to prevent an unregulated

influx of people to forestry and mining concessions, restrict movement within wildlife areas and ensure that workers are supplied with protein (Poulsen et al., 2009). Mining and forestry companies should also be encouraged to actively protect wildlife populations as part of their corporate responsibility. The De Beers mining company, for example, actively protects wildlife across 2,300 km<sup>2</sup> of concessions (<http://www.debeersgroup.com/Sustainability/Environment/Biodiversity/>, accessed November 2012). Finally, care is required with refugee camp establishment, to ensure that they are not located near wildlife areas and to ensure that adequate meat protein is provided (Jambiya et al., 2007).

#### *11.1.1 Challenges associated with land-use planning*

Effective land use planning is likely to require cross-ministerial communication and cooperation. Such cooperation is likely to require significant efforts to raise awareness among ministries of the ecological impacts associated with human encroachment in wildlife areas. Zoning is costly, time consuming and only effective with local support (Naughton-Treves et al., 2005). Where wildlife or people are dependent on seasonal migration to exploit natural resources, zoning is of limited applicability (Goldman, 2003). Convincing governments to consider issues such as bushmeat hunting will be challenging when they are implementing land uses as profitable as mining and forestry. Finally, fences are costly to erect and maintain, can impose ecological impacts by blocking seasonal movements of wildlife and can create massive supplies of snare-wire if designed poorly (Lindsey et al., 2011a; Hayward, 2012).

#### **11.2 Promoting development of alternative livelihoods**

Providing alternative income options is vital for reducing reliance of communities on bushmeat. To this end, integrated conservation and development projects (ICDPs) have been established around

several reserves (Naughton-Treves et al., 2005). ICDPs are designed to promote sustainable development options (e.g. ecotourism, agro-forestry and sustainable harvest of biological resources) compatible with conservation objectives (Naughton-Treves et al., 2005). Several small-scale projects have been attempted close to wildlife areas, such as honey production, crafts production, nurseries, and food-crop production (Van Vliet, 2011). Agricultural projects have particular potential given the relationship between bushmeat hunting/consumption and food insecurity. In Zambia, the Community Markets for Conservation project aims to improve farming skills adjacent to wildlife areas and reward conservation-compliant communities with elevated prices for their produce, and is succeeding at reducing bushmeat hunting (Lewis et al. 2011).

### **11.3 Providing alternative protein and carbohydrate supplies**

Several options exist for reducing reliance on bushmeat for food. a) Protecting/increasing fish supplies. Fish represents a direct replacement for bushmeat in some areas (Wilkie et al., 2005). In Ghana, for example, bushmeat hunting consumption is negatively correlated with fish supplies (Brashares et al., 2004). Fish supplies per person in Africa declined by 14% during 1984-2000 (Ronnback et al., 2002), and improved management of fish stocks is necessary to help reduce demand for illegal bushmeat. Fresh-water and coastal aquaculture has potential to supply fish, molluscs, crustaceans and seaweed and reduce demand for wild fish and bushmeat (Ronnback et al., 2002). b) Addressing veterinary diseases and promoting poultry production. For example, vaccinating chickens against Newcastle disease (coupled with improved husbandry) can increase poultry production by 3-4 times (Lewis, 2005). c) Farming of indigenous mammals such as cane rats (*Thryonomys spp.*) can potentially generate sustainable supplies of bushmeat (Jori 1995). d) Legal production of game meat has significant potential and is discussed in more detail below.

Ensuring that availability of grain foods are sufficient for the entire year is also essential, to prevent reliance on the sale of bushmeat to generate cash to buy grain. The effectiveness of alternative protein approaches may be improved by interventions to increase the price and/or reduce the supply of illegal bushmeat such as by imposing controls on transport of the product, increasing anti-poaching, and providing hunters with alternative livelihoods.

### *11.3.1 Challenges with solutions based on alternative livelihoods and proteins*

There is little information on the success of alternative livelihood or protein projects on bushmeat hunting (Van Vliet, 2011). ICDPs have been criticized for failing to improve livelihoods or confer conservation gains (Naughton-Treves et al., 2005). Where development projects are successful, there is a risk of local population influxes (Wittemyer et al., 2008). There is no guarantee that alternative income or protein options would reduce bushmeat hunting. Hunting and selling bushmeat yields quick profits, confers elevated social status, is usually low risk and requires relatively little time or capital: characteristics often not true of alternative livelihood options (Van Vliet, 2011). Promoting the preferential use of alternative proteins will be challenging where bushmeat prices are low, such as near wildlife areas. There is no guarantee that the income/protein will not be used to augment that from bushmeat, or that other individuals would not take the place of 'reformed' hunters. Such augmentation may be discouraged by including conditional clauses in alternative livelihood/protein projects whereby participation is contingent on the community involved desisting from hunting (Van Vliet, 2011) and by combining such approaches with law enforcement.

There is a risk that increased wealth will increase demand for bushmeat. Relationships between wealth, livestock ownership and bushmeat consumption are complex and variable (Wilkie et al., 2005; Wilkie et al., 2011; Foerster et al., 2012). In Gabon and Equatorial Guinea, bushmeat

consumption increases with income (East et al., 2005; Wilkie et al., 2005; Fa et al., 2009). In the Serengeti, livestock ownership is a poor predictor of bushmeat use, and a chicken vaccination programme increased household cash income and bushmeat usage (D. Rentsch unpublished data). By contrast, on Bioko island in Equatorial Guinea, bushmeat consumption declined with increasing income, as costlier proteins were selected (Albrechtsen et al., 2005; Fa et al., 2009). In western Tanzania, as income from agriculture and livestock increases, the frequency of bushmeat hunting declines (Wilfred and MacColl, 2010). Generally, in rural areas the poorest households consume the most bushmeat, whereas in urban settings wealthier households consume more (Brashares et al., 2011). This finding stresses the importance of alternative income approaches targeting poor households in communities adjacent to protected areas.

Meat from domestic sources may not be considered acceptable replacements for bushmeat by some communities, due to cultural preferences (Van Vliet, 2011) and demand for the product is unlikely to disappear regardless of the availability of alternative proteins. Consequently providing legislative and policy frameworks to allow communities to access meat and other benefits from wildlife in a legal and sustainable way are important.

There are potentially significant negative environmental externalities associated with improved livestock production and aquaculture, though such impacts can be reduced through proper management (Ronnback et al., 2002). Aquaculture and indigenous species farming requires significant start-up capital and expertise, and can create reliance on protracted donor support. Farming of indigenous species has had limited success as hunting is often easier, productivity sometimes suffers from disease outbreaks; and the necessary legal and policy frameworks, markets, and extension services are lacking (Van Vliet, 2011).

As a result of these challenges, alternative livelihoods and protein supplies are unlikely to be effective at reducing bushmeat hunting in isolation, and must be combined with other interventions such as enforcement and legal bases for communities to benefit from wildlife.

#### **11.4 Developing formal wildlife-based land uses**

Bushmeat hunting is an inefficient form of wildlife-use due to wastage, lack of selectivity of the gender and age of animals killed, failure to capture the tourism or trophy values of the animals killed, and low prices often obtained for bushmeat. In Zimbabwe, bushmeat hunters capture <1% of the value of the wildlife they destroy (Lindsey et al., 2011a). Efficient, regulated and selective wildlife harvesting can potentially produce significant quantities of meat sustainably. Legal harvest can yield a fresher, more hygienic product, of guaranteed and preferred species-origin, with lower risks of zoonoses (Lindsey et al., 2011a; Alexander et al., 2012). Legal wildlife-based land uses can generate income from trophy hunting, ecotourism and the sale of by-products such as skins, which is why wildlife-ranching has replaced (or complements) livestock production across large areas of private land in semi-arid southern Africa (Bond et al. 2004). Wildlife-based land uses could be used to address bushmeat hunting and trade in the following contexts:

##### *11.4.1 Wildlife-ranching on private land*

In several southern African countries, user-rights over wildlife were devolved to private land owners during the 1960-70s, resulting in the rapid spread of wildlife-ranching (Bond et al., 2004). Wildlife-ranching is practised across ~287,000km<sup>2</sup> in Namibia, 200,000km<sup>2</sup> in South Africa and 27,000km<sup>2</sup> in Zimbabwe (pre- land reform), with smaller (but expanding) areas in Botswana, Zambia and Mozambique (Bond et al., 2004; Lindsey et al., In press). In Namibia, 16,000-26,000 tonnes of game meat are produced annually on wildlife ranches (Lindsey et al., In press), and 2.4 million tonnes were produced annually in Zimbabwe prior to the land seizures (Le Bel et al., 2004). In South Africa, game meat may comprise 10% of total meat consumption during the hunting season (Dry 2010). These meat harvests have been achieved sustainably and wildlife populations on private land in Namibia, South Africa and Zimbabwe (pre-land reform) have increased dramatically (Bond et al., 2004). In

countries with little private land, governments could encourage wildlife-ranching on state land by allocating long leases to private investors and/or communities.

In southern Africa, wildlife ranches could potentially reduce demand for bushmeat both in urban and rural areas if ranched meat is channelled appropriately. There is scope for the export of game meat from countries with large legal supplies (e.g. South Africa, Namibia) to countries with high demand and low legal supplies (e.g. Zambia, Mozambique, Tanzania). Concurrent with efforts to promote legal game meat production, there is a need to streamline procedures for transporting legal game meat (while addressing the potential for disease transmission), and to impose tighter controls on transporting illegal bushmeat.

#### *11.4.2 Wildlife-based land uses on communal land*

Significant potential exists for developing wildlife-based land uses and producing game meat on communal lands if governments devolve user-rights over wildlife to communities adequately, to provide incentives for the conservation of the resource. The most successful CBNRM programme is the communal conservancy programme in Namibia, where a combination of relatively complete devolution of wildlife user-rights, adequate technical and funding support, and low human densities have resulted in strong incentives for sustainable use of wildlife, sharp reductions in bushmeat hunting, the development of 76 communal conservancies covering ~155,000 km<sup>2</sup>, and recovering wildlife populations

([http://www.nacso.org.na/SOC\\_profiles/Namibia's%20Communal%20Conservancies.pdf](http://www.nacso.org.na/SOC_profiles/Namibia's%20Communal%20Conservancies.pdf), accessed June 2012). Tourism and trophy hunting in Namibian communal conservancies currently generate US\$26.4 million, 2,850 jobs and 315,000 kg of game meat annually (significant quantities accruing to households: e.g. 120 kg/household/year in Nyae Nyae) (R. Diggle unpublished data). Similarly, in

Ankasa in Ghana, the devolution of user-rights over wildlife to communities has resulted in reduced bushmeat hunting and increasing wildlife populations (M. Murphree unpublished data).

In some cases alternative models of developing wildlife-based land uses on communal land may be appropriate. One option is for the development of wildlife ranches in communal areas through establishment of private-community partnerships. If established correctly, such arrangements could provide the capital necessary to re-stock wildlife (if necessary) and develop infrastructure required for hunting or photo-tourism (and/or meat harvesting), while creating scope for ongoing benefits for communities and incentives for desisting from bushmeat hunting. Scope exists for such arrangements where there are blocks of wilderness remaining in areas partially occupied by communities, such as the Zambian Game Management Areas, Mozambican hunting Coutadas, or Tanzanian Open/Game Controlled Areas (Lindsey, unpublished data).

Finally, in some community areas (including Guruve in Zimbabwe, and adjacent to Serengeti NP), legal wildlife-cropping has been attempted in order to replace bushmeat with a regulated harvest, though these initiatives all failed (Feron, 1995; Holmern et al., 2002; Le Bel et al., 2004).

#### *11.4.3 Extending benefits from protected areas to communities*

Extending the benefits from protected areas to neighbouring communities can create disincentives for bushmeat hunting. Various possibilities exist, including: employment; allocating portions of park earnings; involving communities in park management; environmental education; purchasing of produce for tourism from communities; cultural tourism; and allocating stake-holdings (or even complete ownership) of conservation areas to communities (Grossman & Holden 2008). For example, in Namibia, communities are granted concessions in state reserves which they can use to attract tourism opportunities (Weaver, 2011). Ownership of state/private protected areas could be

converted into shareholdings available for purchase by communities (perhaps with donor support) and private companies, thus developing public-private-community partnerships. Such models are business-like and create linkages between park-performance and income for communities, thus creating disincentives for bushmeat hunting.

#### *11.4.4 Challenges associated with developing legal wildlife-based land uses*

Pressure from Western protectionist and animal welfare organisations for restrictions on the sustainable use of wildlife and on the international movement of hunting trophies poses a threat to wildlife-based land uses (Norton-Griffiths 2007). Maximizing the financial value of wildlife through legal forms of utilization is an essential to allow wildlife-based and uses to compete with alternatives and international restrictions on the imports of hunting trophies should be avoided (Lindsey et al. 2012).

Internal policy and legislative constraints also limit the development of wildlife-based land uses in several countries, perhaps most notably a failure of governments to devolve user rights adequately to private landowners and/or communities and a tendency to introduce bureaucratic barriers to the use of wildlife and/or legal sale of wildlife products (Child 2009; Lindsey et al. in press). Challenges associated with replacing illegal bushmeat with legally sourced game meat include the difficulty of achieving competitive pricing and overcoming veterinary restrictions on the movement of wildlife products in many countries. There is a need for altered marketing strategies by game ranchers to ensure that game meat produced is distributed to the areas where demand for bushmeat is highest. Finally, there is a risk that illegal bushmeat could be laundered and sold as legal game meat, and some kind of certification system may be required. Another barrier to the development of wildlife-based land uses is the misconception, particularly among politicians, that they threaten food security (du Toit, 2004).

There are a number of challenges specifically associated with CBNRM, including; the need for protracted technical and donor input; difficulty associated with defining communities; and limited returns per household in areas with high human population densities (Jones, 2007). Wildlife harvesting programmes in communal areas have faced a number of challenges, including: low financial viability; elite capture of benefits; high start-up costs; failure to generate comparable quantities of meat to that produced from bushmeat hunting; failure to capture other value streams from wildlife; uncertainty over appropriate recipients of meat and income; veterinary restrictions on meat distribution; competing claims for shared resources; erratic meat supplies and the low purchasing power of local communities (Parker, 1986; Balakrishnan and Ndhlovu, 1992; Féron et al., 1998; Holmern et al., 2002; Le Bel et al., 2004). Combinations of these factors have led to the dissolution of operations described by Féron et al. (1998) and Le Bel et al. (2004). Wildlife cropping is only likely to be viable as part of CBNRM programmes which aim to capture multiple-use values from wildlife.

### **11.5 Payments to encourage coexistence**

Payments to promote coexistence with wildlife and to encourage communities to desist from hunting illegally represent an additional option to address the bushmeat trade. Such payments can help overcome the mismatch between external groups who capture the actual and existence values of wildlife and the local people who bear the costs associated with living with it. Diverse income streams (e.g. from legal wildlife-use and external financing) could be combined into payments to encourage coexistence, to be allocated if conservation objectives are achieved (e.g. reduced bushmeat hunting or recovering wildlife populations) and to help compensate for wildlife damages (Dickman et al., 2011). This approach would link conservation investment directly to actual conservation success and help reduce poverty and food insecurity (Groom and Palmer, 2010). This

kind of economic approach can attract more funding than traditional conservation from a wider range of donors (Goldman et al., 2008).

#### *11.5.1 Challenges associated with payments for coexistence*

A key challenge would be securing long-term, reliable funding, as markets for biodiversity off-sets have not yet been fully developed. Once a payment scheme is established, stopping it could cause elevated antagonism towards wildlife (Montag, 2003). Other challenges include: identifying reliable indicators of success; dealing with fluctuating environmental conditions; determining who should receive payments (in a manner agreeable to the whole community) and ensuring that payments are transparent, equitable and sufficient to offset the costs of wildlife presence; and, avoiding corruption and elite capture of funds (Dickman et al., 2011).

#### **11.6 Adequate legal protection and law enforcement**

While 'fortress conservation' has rightly been eschewed in favour of approaches that combine conservation and local development, wildlife laws are often not complied with voluntarily (Rowcliffe et al., 2004) so enforcement through anti-poaching and measures to control bushmeat transport and sale is essential. The need for enforcement is acknowledged in the Lusaka Agreement (<http://www.lusakaagreement.org/Documents/3.5.pdf>, accessed May 2012), the African Convention on the Conservation of Nature and Natural Resources (<http://www.africa-union.org/root/au/Documents/Treaties/Text/nature%20and%20natural%20recesource.pdf>, accessed May 2012) and the SADC (southern African Development Community) Protocol on Law Enforcement and Wildlife Conservation (SADC Protocol on Law Enforcement and Wildlife Conservation, accessed November 2012). By increasing the costs associated with bushmeat hunting, effective enforcement can increase the likelihood of alternative livelihood-type interventions

working. Governments (and NGO partners) can improve law enforcement in various ways. In the short term, the most important step is to improve the level of investment in and quality of management associated with anti-poaching.

#### *11.6.1 Improved anti-poaching security*

There is abundant evidence that elevated anti-poaching security can be effective at reducing bushmeat hunting (Hilborn et al., 2006; van der Westhuizen, 2007; Jachmann, 2008a; Stokes et al., 2010) and compelling evidence that stiff punishments for bushmeat hunting are ineffective if the risks of being caught are low (Leader-Williams and Milner-Gulland, 1993; Hofer et al., 2000).

Bushmeat hunting is generally less well addressed than other threats in protected areas (Bruner et al., 2001) and greatly elevated investment in anti-poaching is needed in many reserves (Scholte, 2011). There are several key steps that can be taken by governments to improve enforcement:

a) Allocation of adequate funding. In Ghana, snaring was effectively controlled in six savanna parks with an enforcement budget of US\$51/km<sup>2</sup>/year (Jachmann, 2008a). In the 3,872 km<sup>2</sup> Coutada 9 in Mozambique, an expenditure of US\$28.4/km<sup>2</sup> on anti-poaching has been sufficient to enable wildlife populations to start recovering following historical illegal harvest (Lindsey and Bento, 2012). In the 3,500 km<sup>2</sup> Save Valley Conservancy, a security budget of US\$72/km<sup>2</sup> was sufficient to prevent wildlife population declines everywhere but the highest-pressure areas close to areas settled during the recent land seizures (Lindsey et al., 2012).

b) Adequate manpower to enable sufficient patrol days per month. The manpower and funding needed to control illegal hunting is likely to vary with: the degree of threat from illegal hunting; terrain; vegetation; the size and shape (surface area:volume) of the wildlife area; and, the presence/absence of rhinoceroses (which are a key target for trophy poachers) (van der Westhuizen, 2007; Jachmann, 2008a).

c) Strategic deployment of scouts to cater for temporal and spatial patterns of bushmeat hunting and prevent hunters from predicting timing and location of patrols (Jachmann, 2008a).

d) Employment of experienced staff, qualified for all anti-poaching tasks, and ongoing training programmes to maintain and improve their skills. In addition, there is a need for wildlife agencies to take measures to avoid being burdened by high proportions of inadequately skilled, unfit or sick employees.

e) Adequate working conditions, salaries and equipment (taking into account the strenuous and dangerous nature of the work), to maintain morale, prevent high rates of staff turnover and reduce the likelihood of collusion between scouts and hunters (Jachmann and Billiouw, 1997; Lindsey et al., 2011a). Essential equipment for scouts includes uniforms, hats, boots, radios, handcuffs, GPS units, and firearms.

f) Timely payment of sufficient bonuses for arrests or confiscation of weapons (Jachmann and Billiouw, 1997).

g) Adequate management and supervision of anti-poaching scouts, to maintain morale, reduce corrupt practises among scouts and ensure optimal allocation of effort (Jachmann, 2008a). In Ghanaian parks, visits of scout camps by senior staff members increased the effectiveness of anti-poaching patrol teams (Jachmann, 2008a).

h) Intelligence gathering on planned activities of bushmeat hunters, as this can dramatically improve the effectiveness of anti-poaching (Martin, 1996). Such information can be gathered by employing appropriately connected individuals and/or by paying informants within nearby communities.

i) Developing a good working relationship with the police and local magistrates to ensure effective processing of detainees following apprehension.

j) Adequate monitoring of law enforcement efforts to allow for adaptive deployment of resources and assessment of the performance of staff (discussed in more depth below).

### *11.6.2 Reform of wildlife laws*

An additional step needed over the longer term is to reform wildlife laws to achieve greater uniformity among neighbouring countries and provide stronger deterrents. Databases of bushmeat hunters are needed to enable identification of repeat offenders. Efforts are needed to raise awareness among the judiciary and law enforcement agencies of the value of wildlife and the threat posed by bushmeat hunting. Such efforts were made by the Uganda Wildlife Authority and achieved a shift from minor penalties for bushmeat hunting (small fines [~US\$10-20] or community service) to custodial sentences of 6-12 months for first-time offenders (V. Opyene pers. comm.).

### *11.6.3 Challenges associated with law enforcement*

Communities who rely most on bushmeat are often also the poorest and most food insecure, so efforts to enforce wildlife laws should be combined with efforts to provide alternative livelihoods (Brashares et al., 2011). Anti-poaching is expensive and specialized, and can create animosity with local communities if not handled sensitively and not coupled with efforts to extend benefits from wildlife to communities (Keane et al., 2008).

## **11.7 Reducing availability of snare wire**

Reducing the availability of wire is essential to help control snaring. This can be achieved by securing wire stocks and by using alternative materials for fences. Fencing constructed from barbed or steel wire can be readily converted to snares, whereas that made with kinked, mesh (bonnox/veldspan™) fencing cannot (Lindsey et al., 2012). It is important to raise awareness among governments, businesses and landowners about the negative environmental impacts of wire, which wire-types are less amenable to use in snares, and the need to secure wire to reduce theft by hunters.

## **12. Monitoring the effectiveness of interventions**

Monitoring of illegal hunting and the bushmeat trade can provide insights into the effectiveness of interventions. The event-book system is a simple method for monitoring the incidence of illegal hunting that is easily applied and interpreted by anti-poaching scouts and not reliant on high-levels of training or education (Stuart-Hill et al., 2005). Alternatively, higher-tech monitoring systems such as the Management Information System or Spatial Monitoring and Reporting Tool programmes offer scope for monitoring the nature and extent of illegal hunting (corrected for anti-poaching effort), evaluating the efficacy of law enforcement and assessing the personnel performance. Such tools allow adaptive management of law enforcement in line with temporal and spatial trends in the threat. In Ghanaian parks, evaluation of the effectiveness of anti-poaching patrol teams created a spirit of competition among parks which improved performance (Jachmann, 2008b). Finally, monitoring of the bushmeat trade, via assessment of indices such as catch-per-unit-effort of hunters or species compositions in bushmeat markets can provide insights into the impacts of off-takes (Fa et al., 2000; Rist et al., 2010).

## **13. Funding the necessary interventions**

Necessary interventions will require substantial funding. Providing adequate performance-based funding for state wildlife agencies represents an essential step, as declining budgets severely undermine their ability to protect wildlife (Cumming, 2004). For example, ZAWA operates with a budget of <20% of that needed to function effectively, and consequently their mandate of protecting the vast wildlife estate is impossible to fulfil (World Bank, 2012).

Maximizing the economic value of wildlife is important to generate funds for wildlife management and restrictions on legal sustainable use are inadvisable (Lindsey et al., 2012). Where state land is

leased to tourism and hunting operators, long-term leases should be allocated to incentivize investment in anti-poaching (Lindsey et al., 2007). Funding for reserves could be generated by developing the shareholding structures discussed earlier and encouraging external investment, or by seeking co-management arrangements with NGOs or the private sector. Co-management agreements have potentially to significantly bolster the funding and capacity available to manage protected areas and have achieved some notable successes at reducing illegal bushmeat harvests (e.g. North Luangwa, Lower Zambezi and Liuwa Plains national parks in Zambia and Gonarezhou National Park in Zimbabwe) (Child et al., 2004). Finally, the potential for generating funding for protected area management via markets for carbon off-sets and biodiversity credits should be pursued.

There is a need to raise awareness amongst the international community of the threat posed by bushmeat hunting, to leverage more funding to address the problem. Because of the obvious links between bushmeat and food security, gaining funding from development and humanitarian agencies is a realistic possibility (Lindsey et al., 2011a; Lindsey et al., 2011b); however attention must be paid to evidence of repeated failures of development aid (Moyo, 2009).

#### **14. Differences between savanna and forest biomes**

Key differences exist between forest and savanna biomes with regard to bushmeat hunting and potential solutions. Bushmeat hunting is easier and cheaper to control in savannas (Jachmann, 2008a). There are better established and larger tourism and trophy hunting industries in many savanna countries (Wilkie and Carpenter, 1999), so there is likely to be stronger political recognition of the value of wildlife, and greater wildlife-management and scientific capacity. Frameworks necessary to enable land owners and communities to benefit legally from wildlife are better developed in some southern African countries (Bond et al., 2004). Savannas are more productive

than forests, and so wildlife-based land uses are more likely to be viable (Robinson and Bennett, 2004). Savannas can also support higher densities of livestock, so communities need not necessarily rely on bushmeat for protein (H. Eves, personal communication).

In the literature on bushmeat in forests, the idea is often espoused that bushmeat hunting should be accepted, but regulated (Muchaal and Ngandjui, 1999; Wilkie et al., 2005; Mockrin et al., 2011). In savannas, however, accepting wasteful, inefficient utilization of wildlife via illegal bushmeat hunting is not advisable or likely to be politically acceptable. Rather, the legal and sustainable utilization of wildlife should be pursued in a manner that confers maximal benefits to communities, in conjunction with other the interventions highlighted.

## **15. Research needs**

There is an urgent need for more research on bushmeat hunting and trade in the savanna biomes. Lack of available data makes it difficult to assess the extent of the threat relative to other issues, to determine whether (as suspected) the threat is increasing in scope, or to identify how the threat varies in time and space. This lack of information undermines efforts to mobilize governments to develop coordinated, inter-ministerial responses to address the issue, or to encourage greater focus and investment from NGOs. Research is urgently needed to assess the scale, distribution, trends and patterns associated with bushmeat hunting and trade, and to quantify the ecological, economic and social impacts. In addition, an assessment of the role played by bushmeat in meeting food security needs is needed. Finally, there is a need to assess the scale of potential meat and financial benefits that could be generated from legal wildlife-based land uses in areas where they do not currently occur (or succeed), and to identify the legislative, policy and marketing frameworks necessary for them to arise and work.

## **16. Conclusions**

Bushmeat hunting is a severe threat to wildlife in savannas. The drivers of bushmeat hunting are complex and varied, so multiple interventions will often be required, with the suite of appropriate solutions varying between sites. Failure to address the problem will have dire consequences for wildlife in savanna ecosystems. Economic impacts will include the loss of potentially significant revenues from tourism and legal wildlife-based land uses. Social impacts will be felt through the loss of actual (and potentially greatly elevated) food security benefits from wild meat, the loss of tourism-based employment and the loss of wildlife heritage.

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RESEARCH ARTICLE

# A roaring trade? The legal trade in *Panthera leo* bones from Africa to East-Southeast Asia

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## Abstract

The African lion is the only big cat listed on CITES Appendix II, and the only one for which international commercial trade is legal under CITES. The trade in lion body parts, and especially the contentious trade in bones from South Africa to Asia, has raised concerns spanning continents and cultures. Debates were amplified at the 2016 CITES Conference of the Parties (CoP17) when a proposal to up-list lions to Appendix I was not supported and a compromise to keep them on Appendix II, with a bone trade quota for South Africa, was reached instead. CoP17 underscored a need for further information on the lion bone trade and the consequences for lions across the continent. Legal international trade in bones to Asia, allegedly to supply the substitute 'tigerbone' market, began in South Africa in February 2008 when the first CITES permits were issued. It was initially unclear the degree to which bones were sourced from captive-origin lions, and whether trade was a threat to wild lion populations. Our original assessment of the legal CITES-permitted lion bone trade from South Africa to East-Southeast Asia was for the period 2008±2011 (published 2015). In this paper, we consolidate new information that has become available for 2012±2016, including CITES reports from other African countries, and data on actual exports for three years to 2016 supplied by a freight forwarding company. Thus, we update the figures on the legal trade in lion bones from Africa to East-Southeast Asia in the period 2008±2016. We also contextualise the basis for global concerns by reviewing the history of the trade and its relation to tigers, poaching and wildlife trafficking. CITES permits issued to export bones escalated from ±314y<sup>-1</sup> skeletons from 2008±2011, to ±1312y<sup>-1</sup> skeletons from 2013±2015. South Africa was the only legal exporter of bones to Asia until 2013 when Namibia issued permits to export skeletons to Vietnam. While CITES permits to export ±5363 skeletons from Africa to Asia from 2008±2015 were issued (99.1% from South Africa; 0.7% from Namibia) (51% for Laos), actual exports were less than stated on the permits. However, information on actual exports from 2014±2016 indicated that >3400 skeletons were exported in that period. In total, >6000 skeletons weighing no less than 70 tonnes have been shipped to East-Southeast Asia since 2008. Since few wild lions are hunted and poached within South African protected areas, skeletons for the legal trade appear to be derived from captive bred lions. However, confirmation of a 116kg shipment from Uganda to Laos, and reports of lion poaching in neighbouring countries, indicate that urgent proactive monitoring

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**Data Availability Statement:** Trade data on CITES permits issued for lion bones from Africa are fully available and can be accessed online from the CITES Trade Database maintained by UNEP-WCMC (<https://trade.cites.org/>). Government data obtained from the South African Department of Environmental Affairs (DEA) and the South African CITES Scientific Authority (based at the South African Biodiversity Institute), and specifically the unpublished data on reports submitted to the CITES Secretariat and the permit endorsement records, can only be granted by the respective departments. VLW was the only co-author granted

access to these data; hence, none of the other co-authors had access to it, except through the synthesis of the results as presented in this paper. Since these records are confidential, each researcher must, like VLW, request and motivate for access to these records on a project specific basis, hence VLW cannot confirm that these data will be available on request to all interested researchers. Contact [mtjiane@environment.gov.za](mailto:mtjiane@environment.gov.za) at DEA, or the Scientific Authority from <http://www.sanbi.org/biodiversity-science-policyaction/scientific-authority>. Regarding the availability of the air waybill data, there are tighter restrictions regarding access. The data were supplied by a freight forwarding company with the permission of six lion bone traders. Only VLW was granted access to this data, and only because of the work she is conducting for the South African Scientific Authority on the lion bone trade to support SANBI's mandate to supply the DEA with information on the trade. The data were supplied to VLW on the strict condition of anonymity – i.e. that neither the company, nor the traders, could be identified due to the sensitive nature of this information. We have published a large proportion of the data in this paper that we were provided with in a synthesized manner. However, given the condition for absolute confidentiality, VLW cannot make the entire record available for public access, nor can the contact details of the company who provided access to these data be shared. Furthermore, since this work is being conducted for government, researchers would also need permission for the data to be released.

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and evaluation of the legal and illegal trade is necessary in African lion range states where vulnerable wild lion populations are likely to be adversely affected.

## Introduction

“*Anger over lion bones sales*” was the first South African media headline to proclaim publicly the existence of a legal trade in African lion bones, allegedly to supply the substitute ‘tiger bone’ market in East-Southeast Asia (E-SEA) [1]. The December 2009 story provoked widespread outrage when it was revealed that a CITES permit had been issued to a farmer to legally sell lion bones. Unbeknownst to the public however, and contrary to what was reported, South Africa had issued its first CITES export permit 22 months earlier in February 2008 for ‘10 skulls/skins’ and ‘20 floating bones’ to an importer in Lao People’s Democratic Republic (Laos) (erroneously recorded on the permit as Vietnam) [2]. A second CITES permit was issued in July 2008 to export 35 lion skeletons and 16 skins, followed by a third permit four months later for 15 skeletons. But by the time evidence for the legal trade became public knowledge in December 2009, permits to export another 197 lion skeletons of captive-origin to Laos had already been issued.

The existence of a market for lion skeletons in Southeast Asia, and the export of captive-origin bones from South Africa in 2008 (Fig 1), took the conservation community by surprise. The captive lion and canned hunting industries had previously courted controversy in 2007 when the South African Predator Breeders Association (SAPBA, now SAPA) challenged the Minister of Environmental Affairs over proposed regulations that captive lions could be hunted only after a 24-month ‘self-sustaining’ release period [3±5]±a case that SAPBA eventually won, and a matter that was later relevant to the lion bone trade. Two years later, when related concerns about the sources of skeletons for the lion bone trade emerged, pertinent questions raised included: were captive-bred and/or trophy hunted (including ‘canned-hunted’) lions the source of the bones, and was commercial and domestic trade an incipient latent risk that that could adversely affect vulnerable wild lion populations across Africa?

To answer these questions we undertook two investigations of the bone trade, starting in 2013. The first investigation was an assessment of the South African lion bone trade for the period 2008±2011 [2,6,7], and the second a pan-African stakeholder survey in 2014±2015 to record the then prevailing knowledge on the utilisation and trade of lion body parts (including bones) across current and former range states [8]. In the first investigation we concluded that skeletons from South Africa were typically a so-called ‘by-product’ of the trophy hunting industry that originated from captive-produced lions; and, despite there being no cultural history of consuming lion parts in Asia, the emergence and persistence of the South African±Asian lion bone trade is inextricably linked to the market for tiger products (and other large felids) [2]. However, while the trade did not appear to be impacting specifically on South African wild lion populations in formally proclaimed protected areas, the status and collateral impacts of the bone trade on wild lion populations in other range states was subject to debate and concern and was largely undocumented [2]. The second investigation revealed that domestic utilisation and international trade of lion bones within and among African countries for traditional purposes (especially zootherapeutic, or medicinal) is an evident cultural stimulus for trade in addition to the demand from markets in East-Southeast Asia [8]. Hence, there are concerns that the legalised sale of lion bones, supplied by captive-bred lions, from South Africa is (i) impeding efforts to curb the tiger trade because access to lion parts might be perpetuating and/or expanding the market for large felid bones, and thereby rekindling efforts to



**Fig 1. Lion skeletons, skull and claws before being sent for taxidermy, and a box of cleaned and prepared lion bones ready for export to Southeast Asia (bottom right) (V.L. Williams).**

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poach tigers as the demand is supplied, and (ii) abetting the illegal acquisition and trade in lion bones and derivatives across Africa (seemingly evinced through the rise in incidences of lion poaching and trafficking).

The debate on the international trade in lion derivatives came to the fore at the October 2016 17<sup>th</sup> Conference of the Parties to CITES (CoP17). Nine lion range states proposed that *Panthera leo* be up-listed to Appendix I status based on threats to the species, including the international bone trade [9]. However, the proposal was not strongly supported because “neither the biological nor the trade criteria required to list the African Lion under Appendix I were met” [10]. A controversial compromise was reached, allowing African lion to remain on Appendix II but with the following annotations: (i) a zero annual export quota for specimens of bones, bone pieces, bone products, claws, skeletons, skulls and teeth removed from lions in the wild and traded for commercial purposes, and (ii) South Africa must establish a national export quota for commercial trade in lion bones, bone pieces, bone products, claws, skeletons, skulls and teeth derived from captive breeding operations [10,11]. Furthermore, studies on the legal and illegal trade in lions (including the bone trade) must be conducted, in part to inform the quota setting process, and so that CITES Parties can re-evaluate the status of lions at CoP18 in 2019. The African lion is the only big cat listed on CITES Appendix II and as such, the only one for which international commercial trade is legal under CITES, up until the CoP17 Decision, when it was limited to a quota for South African exports. The 2017 lion bone export quota was set at 800 skeletons, with or without the skull, in July 2017; however, no export quota has been set for teeth, claws or individual bones.

Considering the requirement for information on the lion bone trade, the purpose of this paper is to re-examine information for the East-Southeast Asian lion bone trade from 2008 by (i) consolidating and updating new information available for the period 2012±2016, and (ii) including information on concurrent legal trade reported from other African countries. Hence this paper reports on the export of lion bones from Africa to East-Southeast Asia from 2008±2016. Furthermore, we contextualise the basis for global concerns regarding the lion bone trade by reviewing the history of the East-Southeast Asian trade and its relation to tigers, poaching, wildlife trafficking and Asian wildlife trade syndicates.

## Rise of the lion bone trade to East-Southeast Asia

The illegal trade in tiger body parts is a persistent and significant threat to wild tiger populations across Asia [12,13,14], and their bones (an ingredient in Traditional Chinese Medicines, TCM) are one of the most lucrative products sold on the illegal wildlife market [15]. But while there are diverse strategies, policy interventions and efforts that are intended to protect tigers by securing habitats and landscapes, prevent poaching, strengthen compliance with existing trade bans, and effect constructive trade reduction measures, felid substitutes (most notably lions, but also leopards) for tigers are maintaining a supply of bones and may be foiling efforts to curtail the market [2].

As Chinese wild tiger populations rapidly declined, it was noted that purveyors of tiger products turned to other tiger range-states, and later other large Asian felids, to source bones. Tiger poaching in India, for example, was noted in the mid-1980s [16±19] and eventually incidents involving leopards and the Gir/Asiatic Lion (*Panthera leo* subsp. *persica*) were reported there about 20 years later [19±22]. In 1997, Khoshoo predicted that derivatives from big cats would eventually be substituted for tiger parts in Chinese medicines: “*once tiger is decimated, the next target will be lion, followed by leopard (even bear) and all other felines from Asia and Africa*” [23].

An increased prevalence in tiger bone substitutes was observed across East Asia and in shops selling Traditional Asian Medicines (and associated purported tonic preparations) in the USA and Australia from the mid-1990s [14,24±27]. Images of lions appeared on labels of manufactured Chinese medicines c.1995 [24,27], but there was no evidence then that bones from wild lions were being used±however, there was speculation that bones from captive animals in China were being substituted illegally [27]. Sales of products with lion bone are not banned in China [14], hence using substitutes (or, pretending to use *Panthera* species substitutes by mislabelling the products and/or excluding derivatives from the mixtures) was a way to avoid attracting regulatory action for products that did not contain tiger [S. Broad, pers. comm., March 2015].

An investigation by TRAFFIC in 2005 confirmed that African lions were an ingredient in ‘tiger’ ‘bonestrengthening wine’ [28]. A company in southeast China was given permission to produce the wine, but ‘Pantheraleo’ bones were listed as the approved ingredient [12,27,28]. Furthermore, a nearby tiger breeding farm that was a subsidiary of the company also kept African lions on its premises [22,29]. Despite the company insisting that the product was made from tiger carcasses, an investigation by the Chinese government in 2006 reported that “*only 16 legally obtained lion carcasses were found, and no tiger bones were used to produce the wine*” [28].

Khoshoo's [23] projection that lion would be a target was confirmed a decade later. In March 2007 the first of three incidents occurred that police said implicated TCM as the motive behind the poaching of at least eight Asiatic lions over a six-week period in the Gir National Park, Gujarat, India, which led to a gang of poachers being convicted in 2008 [2,19,21,22,30±

33; Wildlife Protection Society of India, pers. comm. 11/05/2014]. These incidents caught Indian officials unawares since no one suspected that the market for medicines would be implicated in, and lead to, incidents of lion poaching [19].

Preceding and coinciding with these incidents, and ones that followed in South Africa in 2008, were the series of policy interventions (at national and international levels [13]), including Decisions and Resolutions adopted at various Conferences of the Parties to CITES pertaining to Asian Big Cats (Tiger, Leopard, Clouded Leopard, Snow Leopard) that were intended to diminish and ban the trade in tiger and Asian felid products, enhance enforcement and compliance, and protect tigers and other Asian big cats. In response, syndicates involved in the illicit trade found legislative loopholes and alternative sources for tiger bones to circumvent (and/or ignore) trade bans and other measures that delimited their activities [2]. Henry [26] reported that “*as tigers received greater protection and attention, the demand for tiger parts used in traditional medicines shifted to other Asian big cats and further threatened their survival*”. A Decision taken at CITES CoP14 in June 2007 might also have been an inadvertent factor in the beginnings of the South African lion bone trade, viz. *Decision 14.69*. The Decision stated that countries with tiger breeding programmes (such as China, Vietnam, Thailand, Laos) should phase out breeding for commercial purposes and limit the size of their captive populations [34±37] (note: there is no indication that captive tiger populations have been reduced in response to this Decision, which thus led to a series of new decisions at CoP17 focussed on tiger farming [38]). Eight months later in February 2008, the first CITES permit to export lion bones from South Africa was issued±but warnings of Asian interests in African lions, and potential threats to another of the continent's big five flagship species, were only sounded the following year.

In March 2009, conservation officials were alerted to an illicit trade in lion parts when Nguyen Van Hai, a Vietnamese immigrant, was arrested in Pretoria (South Africa) for being in possession of several lion carcasses [2,39±46]. Detectives found “*recently-executed lions and . . . rhino*” on the premises, and speculated that he was involved in killing endangered African mammals ‘to-order’ for a syndicate operating from the ‘Far East’ [41,45]. Thereafter, there was no overt evidence of trade for the next eight months until December 2009 when it was reported that there was a growing trade in bones to Asia (sourced from hunting facilities) after a lion farmer had been issued a CITES permit to legally sell bones [1,2,47]. To Asian importers, skeletons from captive-origin lions were plentiful, cheaper, and mostly legal alternatives to tigers and other large felids. And, since it was known: (i) that demand was driven from East-Southeast Asia, (ii) that big cat bone traders accepted lion bones as an alternative to tiger bone, and (iii) that lion bones were reportedly being passed off as tiger bones in medicines and tonics, the conservation world was becoming increasingly nervous about the trajectory of the trade and what impact it might have on wild lion populations.

The next arrests occurred in June 2011 when two Thai men (Phichet Thongpai and Punpitak Chunchom) were found with lion bones in Johannesburg [48,49]. They admitted in court that they worked for “*Vichai Company*” (the Xaysavang Export-Import Company, headed by Vixay Keosavang, in Laos [22,47,50]), and that the main business of the company was to trade in lion bones [48,51]. Furthermore, they said they “*were sent to South Africa by the company to view and approve lion bones to be bought and shipped to the company*” [48,51]. Thongpai also admitted that the “*company for which I worked is usually contacted by farm owners in South Africa and advised that they have lion bones for sale*” [48]. Both men were fined and repatriated [48]. A month later in July 2011, police arrested the leader of a rhino poaching syndicate±±Chumlong Lemtongthai±±at the same residence as Thongpai and Chunchom [47,49,52,53]. Hence, Lemtongthai was part of the same syndicate working for Xaysavang and also trading in bones [[47,52,54,55]. Details of Lemtongthai's rhino poaching

activities are covered extensively by Rademeyer [47] and TRAFFIC [56]. Chunchom, however, was rearrested on arrival in Johannesburg in November 2011 [57]; it was suspected that he had returned to buy lion bones and 'engage in illicit activities'±but this time he was also accused of running a rhino horn smuggling syndicate with Lemtongthai [51,58,59]. Chunchom's case was joined with Lemtongthai's and the case came to trial a year later; while Lemtongthai was eventually sentenced in November 2012 to 40 years imprisonment for charges relating to illegal rhino hunting and horn exports, the charges against Chunchom were dropped and he fled the country illegally [2,60].

Lemtongthai appealed his sentence twice [61,62]; admissions published in court documents after his appeal in 2014 (when his sentence was reduced to 13 years) publically revealed: (i) that the Xaysavang Company dealt in the trade of rhino horn, lion bones, teeth and claws; (ii) Lemtongthai was sent to South Africa by Keosavang to enquire about the purchase of lion bones; (iii) on Lemtongthai's arrival in South Africa, he saw various adverts for the hunting of the big five, including rhino; and (iv) Keosavang said he would fund any trade in rhino horn [62]. It was also reported that he wanted to buy 300 sets of lion bones [63,64]. Thus, the admissions made by Lemtongthai, Chunchom and Thongphai during their 2011±2014 court cases, and other evidence provided by informants to our research, suggests that Xaysavang's involvement in the lion bone trade precedes their involvement in the rhino horn trade, and that the company started legally procuring lion bones from farmers c. February 2008 when the first CITES export permit was issued [2]. However, there are allegations that the illegal export of bones and Xaysavang's relationship with South African lion breeders through Lemtongthai commenced earlier [e.g. 54]. Furthermore, it seems likely that the surge in the number of rhinos killed in poaching incidents from 2008 was entangled with Xaysavang and the commencement of the legal lion bone trade the same year [2].

Keosavang, however, is reportedly no longer a kingpin in the Laotian wildlife trade, having allegedly stepped back in 2014 due to pressure placed on him by the US government, and also the revoking of his licence to trade wildlife by the Lao government in January 2014 [50,54,65]. His step down coincides with the 2014 decline of bone exports to Laos (see Table 1). But, there are other Laotian-, Vietnamese- and Thai-based customers and syndicates involved in the lion bone trade (see [54,65]), and the legal trade will continue from South Africa while a quota is in effect. The extent to which the trade is conducted through lawful sources is examined next.

## Methods

### Information sources

Trade data on legal exports of lion bones from Africa were obtained from: (i) the online CITES Trade Database maintained by UNEP-WCMC (<https://trade.cites.org/>) for 2008±2015; (ii) unpublished data supplied on request by the South African Department of Environmental Affairs (DEA) and the South African CITES Scientific Authority, including the annual reports of issued permits that were submitted to the CITES Secretariat for 2008±2015; and (iii) actual export data for 2014±2016 provided by the freight forwarding company that has handled most of the bone consignments destined for East-Southeast Asia (E-SEA) since 2013. The export data from the freight forwarding company were only supplied with the consent of their customers (i.e. six of the main traders of lion bones in South Africa, who buy bones from farms and hunting facilities) and on the strict condition that their identities were not revealed; only the corresponding author of this paper has communicated with the people concerned. This company and the traders also supplied pertinent anecdotal information that are included as anonymous personal communications. Since evidence showed that the legal lion bone trade to E-SEA commenced in early 2008, and that there were only sporadic, low-volume records of

**Table 1. Total number of lion skeletons and bodies <sup>a</sup> originating from Africa listed on issued CITES permits and destined for East-Southeast Asia from 2008±2015.** Figures do not represent the actual annual exported quantities <sup>b</sup>.

Year	Laos	Vietnam	Thailand	China	Total
<i>Skeletons (SKE)</i>					
2008	60	0	0	0	60
2009	171	2	0	48	221
2010	240	117	0	0	357
2011	531	64	20	2	617
2012	87	85	0	0	172
2013	974	309	14	0	1297
2014	433	892	0	0	1325
2015	230	936	148	0	1314
<b>Total SKE</b>	<b>2726</b>	<b>2405</b>	<b>182</b>	<b>50</b>	<b>5363<sup>c</sup></b>
<i>Bodies (BOD)</i>					
2008	0	0		1	1
2009	0	0		0	0
2010	0	0		10	10
2011	0	0		21	21
2012	61	104		15	180
2013	0	0		27	27
2014	0	2		0	2
2015	0	0		0	0
<b>Total BOD</b>	<b>61</b>	<b>106</b>		<b>74</b>	<b>241<sup>d</sup></b>
<b>Total no. SKE &amp; BOD</b>	<b>2787</b>	<b>2511</b>	<b>182</b>	<b>124</b>	<b>5604<sup>b</sup></b>
<b>Total %</b>	<b>50%</b>	<b>45%</b>	<b>3%</b>	<b>2%</b>	

<sup>a</sup> The CITES database lists more bodies, but most records were converted to skeletons (see [Methods](#))

<sup>b</sup> The actual annual exported quantities are less than what was listed on the issued CITES permits because traders do not typically export all of what they applied to export, and/or they don't use the permit in the same year it was issued

<sup>c</sup> 99.1% (5316 SKE) from South Africa; 0.9% (47 SKE) from Namibia (all to Vietnam 2013±2015) (South African provincial data in [Table 2](#))

<sup>d</sup> 97.9% (236 BOD) from South Africa; 2.1% (5 BOD) from other African countries viz. Namibia (2 BOD), Tanzania (2 BOD) and Zimbabwe (1 BOD) (all to China) (South African provincial data in [S1 Table](#))

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lion products being exported there up to 2007 (see Figure 24 in [2]), we have only included permit reports from 2008 onwards.

CITES export permit data indicate the total quantity (e.g. sets of bones) that specific export permits were issued for; hence, an exported consignment should not exceed the quantity stated on the permit. Actual quantities of legally exported bones can only be deduced from (1) records of CITES permits that have been inspected and 'endorsed' by a nature conservation inspector at the port of exit (for which we had access to an incomplete set of records while preparing this manuscript) (see [Results](#)), and/or (2) from the air waybills (AWB) generated by freight forwarding companies [2], and/or (3) from records kept by the exporting traders. Data supplied by the freight forwarding company from the AWBs from 2014±2016 was on behalf of the lion bone traders, and these data contained: (i) combined monthly totals of the sets of bones exported, and (ii) the destination countries (but not the names of the cargo recipients) in E-SEA.

### Cross-checking and correcting the CITES trade data

The annual CITES reports are the most accessible means available for monitoring the maximum levels of legal international trade [66], but they rely on consistent and accurate reporting

by CITES Parties. We had concerns over the fidelity of the reports submitted to the Secretariat when cross-checking the detailed South African annual reports with the CITES Database (compared by using the variables: importer, reported quantities, trade term, purpose and source). One concern relates to the interpretation of trade terms—for example, the CITES trade term ‘bone’ (BON) is different to ‘skeleton’ (SKE). Whereas ‘bone’ is in units of individual bones (e.g. floating bones), and/or the mass thereof, ‘skeleton’ refers to the number of “*substantially whole skeletons*” [66]. A ‘skeleton’ is further differentiated from a ‘body’ (BOD), which refers to “*substantially whole dead animals, including. . . whole stuffed hunting trophies, etc.*”. During crosschecking, we found that BON, SKE and BOD destined for E-SEA were inconsistently classified on South Africa’s annual reports—in part because (1) there is no CITES trade term guideline for interpreting the description ‘carcass’, and (2) there were different interpretations of what constitutes a ‘set’ of lion bones. For example: (i) 5 ‘*skull & bones of 5 carcasses*’ were captured as ‘5 SKE’; (ii) 32 carcasses were captured as ‘32 BON’ (instead of 32 SKE); (iii) 50 carcasses (947kg) were captured as ‘50 BOD’ (instead of 50 SKE); (iv) 117X9 Bones were captured as ‘117BON’ (instead of either 1053 BON or 9 SKE, partially complete, see below), (v) *bones of 15 lions* was recorded as ‘15 BON’ (instead of 15 SKE), and (vi) 2 (*two*) sets of bones, was recorded as ‘2 BON’ (instead of 2 SKE). These inconsistencies were consequently incorporated into the Trade Database and thus some of the quantities available for BON, SKE and BOD for South Africa are misleading, sometimes inflated, and punctuated with errors. [Note: under the 2017 quota system, record anomalies should not occur because (i) only complete skeletons are allowed to be exported, with or without the skull, and (ii) issued CITES export permits will show the actual quantity of skeletons permitted in a shipment per trader (viz. number, and the total weight), instead of quantities that traders used to sometimes ‘*guestimate*’ they could export when they applied for permits from Issuing Authorities prior to procuring bones from facilities].

These inconsistencies thus necessitated that all the lion bone data on the CITES Trade Database be crosschecked with the original DEA information to standardize, correct and/or reclassify records wherever appropriate (as done in the examples described). Further examination of the permits established that ‘bones’ exported for the lion bone trade to E-SEA are usually ‘sets’ of lion bones and thus ‘skeletons’ of varying degrees of completeness (where one ‘set’ comprises bones derived from the skeleton of one lion). Bones like the skull, jaw and clavicles (paired ‘floating bones’) are typically absent from a set if the lion was a hunting trophy. From our estimates for the period 2006±2011, ±14% of skeletons of trophy-hunting origin were complete sets [2] (a lion bone trader subsequently confirmed that it was unlikely that >20% were complete sets [Anonymous, pers. comm., July 2017]). Hence, while lions have up to 309 bones (including teeth and sesamoids), a set from a trophy could have up to 206 bones (minus the skull, jaw, clavicles, teeth and sesamoids), or a partial skeleton could have a set of 117 bones if the vertebrae are excluded [2].

Wherever the mass of a set of bones was captured on a CITES permit, it was converted to units of skeletons (e.g. 1573 individual bones declared to weigh 107.5kg was calculated to be equivalent to ±11 SKE following Williams et al [6]). It was by these means that some anomalous permit declarations were identified and corrected for, such as 947kg of bones being listed as 50 SKE instead of ±100 SKE (see Williams et al [6]). The biggest error detected was for ‘2910 SKE’ and ‘14SKE’ destined for Thailand in 2013; on re-examination of the original provincial record, the permit entry was for ‘2910 bones from 14 skeletons’—hence this record was corrected in our analyses to reflect 14 SKE only. In re-interpreting the data, all but one of the records for ‘bones’ listed on the Trade Database could be subsumed within the category ‘skeletons’. A 2013 permit for ‘531BON’ destined for Vietnam was not converted to SKE because there was

no corresponding information in the annual report from DEA (compiled for CITES) to compare with.

Since the issued CITES permits are listed provincially in the annual reports submitted by DEA to the CITES Secretariat, we could request that anomalous permit records be re-examined by the provinces. Consequently, an error was found in the 'country of import' on the first permit issued by the Free State province (South Africa) to export lion bones in February 2008. Despite 'Vientiane, Lao PDR' being typed on the original permit, the country was incorrectly listed as VN (ISO code for Vietnam) instead of LA (ISO code for Lao PDR). Further queries for the other permits issued that year also established that all the 2008 records on the CITES Trade Database for lion 'bodies' exported to 'VN' were incorrect, and they were amended to 'skeletons' exported to 'LA' accordingly.

Since we could not satisfactorily quantify the extent of illegal trade for lion bones, this aspect is not mentioned much in this paper. TRAFFIC International, which annually publishes records of some seizures and prosecutions that have come to its attention, had only published two cases to date of seizures involving African lion bones and skeletons in E-SEA (which incidentally have not been reported on the CITES database as source code 'I'), and three cases involving Asian nationals arrested in Africa with claws and/or teeth [67±69]. Furthermore, there are no CITES records of (i) legal inter-Asian trade in lion bones, medicines or derivatives, or (ii) illegal trade (i.e. seizures) between Africa and E-SEA for lion products (using source code I). However, the US has made four seizures since 2009 of lion derivatives/medicines from China, including one coded 'commercial' for 200 units. This suggests commercial 'medicinal' trade in lions is not restricted to Asia and Africa; like the tiger trade, it may involve the wider Asian diaspora [K. Nowell, pers. comm., May 2017].

Throughout the paper 'East-Southeast Asia' (E-SEA) collectively refers to key destination countries for lion bone exports, namely China, Laos, Thailand and Vietnam. The E-SEA sub-region technically comprises 22 mainland and maritime countries sometimes referred to colloquially as the 'Far East'. The 18 other countries or territories in E-SEA were excluded from the study because there were no records of legal lion bone trade in the 2008±2015 period. South Korea had, however, reported at least 29 lion bodies, of which three were allegedly wild-sourced (W) and originated in South Africa and the remainder were captive-bred (C) from Europe; the trade purpose was mainly listed by the importers as being for 'circus or travelling exhibition' (Q), whereas the exporters listed the purpose as commercial (T).

## Results and discussion

### The African lion bone trade: 2008±2016

In addition to hunting trophies, African countries have issued permits to legally export 22 other categories of lion body parts since 1977 (CITES Trade Database). Lion skeletons, bones and bodies have been exported to E-SEA since 1998, and especially since 2008. South Africa is the primary exporter (with bones mostly obtained from trophy hunted captive-bred lions), however other African countries have also issued CITES export permits (all wild-origin).

The CITES export data presented here for 2008±2015 are based on the adjusted quantities listed on the export permits issued for skeletons (SKE) and bodies (BOD) (see [Methods](#))±in other words, quantities traders had usually 'guestimated' they could export when they applied for the permits, and *not* the actual quantities exported. However, most traders say they tend to use the entire permit, so actual exports should be close to the quantities listed on the issued permits [Anonymous, pers. comm., July 2017].

From the permit endorsement records it was noted that some exported consignments were smaller than the maximum allowed by the corresponding permit, and some permits were not

used in the same year they were issued. Lion bone traders said that this happened quite frequently in the past because hunting establishments had a tendency to stockpile all, or most, of the skeletons resulting from hunts in a year until ca. November, after which they would sell them to "[lion bone traders] to assist with travel expenses during January and February when most of the international [hunting] tradeshows take place" [Anonymous, pers. comm., July 2017]. And, since the traders were unable to complete the applications for permits (including CITES) in time due to the December vacation period in South Africa, the export of those stockpiled bones was typically delayed until January/February of the following year [Anonymous, pers. comm., July 2017]. However, bone traders also said that uncertainty in the industry from January 2016 resulted in this practice (of stockpiling) being abandoned, and most hunting farms sold bones on a monthly basis for the rest of that year [Anonymous, pers. comm., July 2017].

As noted in the Methods, records of CITES export permits that are 'endorsed' at a port of exit can be used to compile the annual number of exported skeletons. To endorse a permit requires a nature conservation official to inspect the shipment, certify the quantity declared, and return the third page of the permit to the Issuing or Management Authority [2]. However, CITES permits for lion bone shipments were not consistently endorsed until April 2015; hence, we were unable to determine what proportion of skeletons/bodies listed on the permits were documented to have been exported prior to that period. Officials at OR Tambo International Airport (ORTA, Johannesburg) (reliably believed to be the only port of exit for South Africa's legally exported lion bones) keep a record of endorsed permits and submit these to the South African Management Authority (DEA, pers. comm., 8 March 2017). Data supplied to us for permits endorsed at ORTA for the period October 8, 2015 to November 26, 2016 showed that 89% of the bone quantities listed on those permits issued in that period were exported. However, this data set is incomplete. Hence, except for the air waybill (AWB) data from the freight forwarding company on actual exports from 2014±2016, our results are a guide to the maximum quantities that could have been legally exported from Africa to E-SEA from 2008 to 2015. Traders say that under the 800 skeleton per year quota, 100% of the permit will be used because the maximum quantity allowed for 2017 is less than what they can be supplied with [Anonymous, pers. comm., July 2017].

**Skeletons: CITES permit records.** Quantities listed on CITES permits for the worldwide legal export of lion skeletons before 2008 totalled 14 specimens that were mostly wild-sourced (W) for scientific (S) and educational (E) purposes (average  $<1\text{yr}^{-1}$  from 1982±2007; six from Africa). The only export permits South Africa issued in that period was for three skeletons to Denmark in 2001. In 2008, South Africa issued the first permits to export 60 captive-origin (C) skeletons to Laos for 'personal' purposes (P) (erroneously reported on the CITES Trade Database as 60 'bones' to Vietnam). Thereafter, the quantities reported on permits issued in Africa grew at a rapid rate and averaged  $314\text{yr}^{-1}$  from 2008±2011, but  $1312\text{yr}^{-1}$  from 2013±2015 (Table 1). In the period 2008±2015, permits allowing ±5363 skeletons to be exported from Africa to E-SEA were issued (5316 from South Africa; 47 from Namibia in 2013±2015). Laos was the primary destination (2726 SKE; 51%), followed by Vietnam (2405 SKE; 45%), Thailand (182 SKE, 3%) and China (50 SKE; 1%) (Table 1).

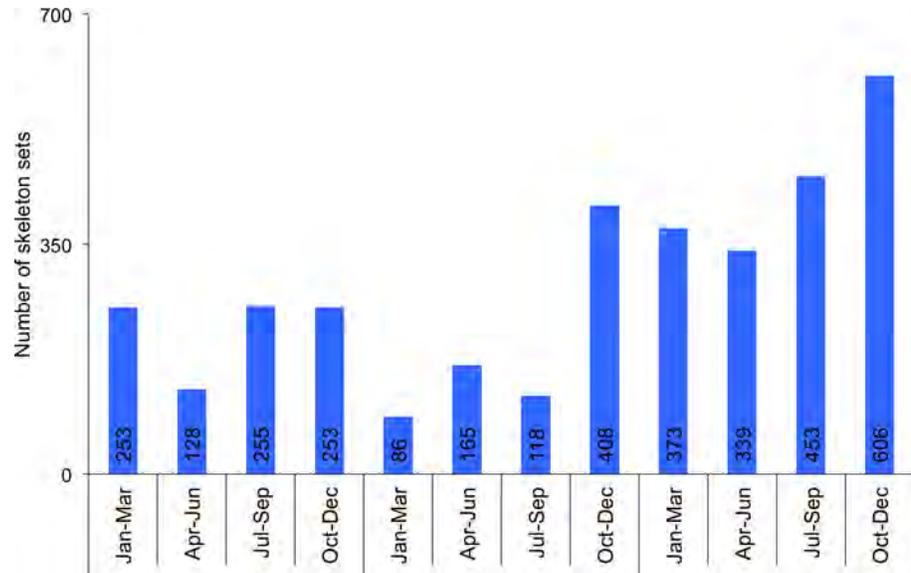
We have not established reasons for the 2012 drop in the number of SKE listed on permits (Table 1) although the number of BOD that year was more than five times the average for 2011 and 2013 (Table 1). However, lion bone traders said that the quantities they exported in 2012 increased from 2011 and they therefore attribute the 2012 figure to errors in record keeping, and/or incorrect data capture, by the provincial CITES permit Issuing Authorities [Anonymous, pers. comm., April 2017].

In 2014 and 2015 there was a sharp decline in the annual number and proportion of skeletons that bone traders applied to export to Laos (Table 1). The quantities dropped from 76% of SKE for 2008±2013, to 25% of SKE for 2014±2015. The drop was attributed to be a consequence of: (i) the Laos-based Xaysavang company, the primary importer of bones, being weakened by pressure from the USA and having its licence revoked to trade wildlife in January 2014 (see later), and (ii) a seven-month commercial trade suspension of CITES-listed species that Laos received from March 2015 because of their failure to submit a National Ivory Action Plan (NIAP) timeously and in accordance with recommendations previously adopted by the CITES Standing committee [70±72; Anonymous, pers. comm., April 2017]. After the NIAP was received, CITES Parties lifted the suspension of trade in September 2015 and bone exports to Laos resumed in November 2015 (Anonymous, pers. comm., April 2017). Importantly, these factors resulted in (i) a reduction in the average monthly exports of skeletons in 2015 [Anonymous, pers. comm., April 2017] (see also Fig 2), and (ii) trade being diverted to other countries because South African bone traders sought new customers in E-SEA. Trade was mostly diverted to Vietnam during the involuntary market restructuring (Table 1; Fig 3), however some traders ceased exporting for eight months in 2015 because their only customers were in Laos [Anonymous, pers. comm., April 2017]. Regarding their customers, South African traders suspect there are 3±5 main customers for lion bones in E-SEA±however, traders said that they typically do not deal with these customers directly and that they liaise instead with numerous agents representing these customers [Anonymous, pers. comm., April 2017].

Besides South Africa, only Namibia is known to have issued CITES export permits for skeletons up to 2015 (99.1% and 0.9% of the total quantity respectively). Furthermore, only South Africa and Namibia have issued permits to export skeletons to non-Asian destinations (three from South Africa to Australia in 2014; six from Namibia to an unknown destination in 2013). Hence South Africa has issued permits to export 99% of all lion skeletons listed on the CITES Trade Database up to the end of 2015. As noted earlier, our figures include the reclassified permit entries and will thus not align completely with the CITES database entries.

It remains to be seen whether other African countries issued CITES permits to export lion bones to E-SEA in 2016, but there are no records of non-African countries exporting skeletons there. However, there is AWB evidence for a 116 kg consignment of lion bones being exported from Uganda to Laos in 2016 (±10±12 SKE, using [6]) [V.L. Williams, pers. obs., May 2017]; whether this consignment was legal and had a CITES permit is unknown. Furthermore, several South African lion bone traders (i) believe there are illegal, but not substantial, exports of bones from other African countries, and (ii) heard rumours that Zimbabweans were investigating exporting skeletons, but they had no evidence that trade had actually occurred [Anonymous, pers. comm., April and July 2017]. The CoP17 annotation, however, will quash any plans by lion range states other than South Africa to legally export bones from 2017.

The main South African provinces issuing CITES permits from 2008±2015 were the Free State (2023 SKE; 38%), Gauteng (1371 SKE; 26%) and North West (1342 SKE; 25%) (Table 2). Except for Gauteng, these provinces are the main role-players in the lion hunting and/or captive-breeding industries. The Free State has the most lions in captivity, but most trophy hunting takes place in North West [2]. An audit of captive breeding facilities in South Africa in 2016 revealed that 29% of these facilities had sold lion bones in the past [DEA, pers. comm., January 2017]. While the Free State has consistently issued permits to exporters from the province since 2008, Gauteng exporters are only recorded from 2013. Lion bones, however, most likely do not originate from the same province in which a CITES permit is issued±especially in the case of Gauteng-origin permits. The traders buy skeletons from multiple facilities in different provinces, consolidate the shipments, and then apply for permits from a province (usually their home province) to export multiple sets of bones, irrespective of skeleton origin [2;

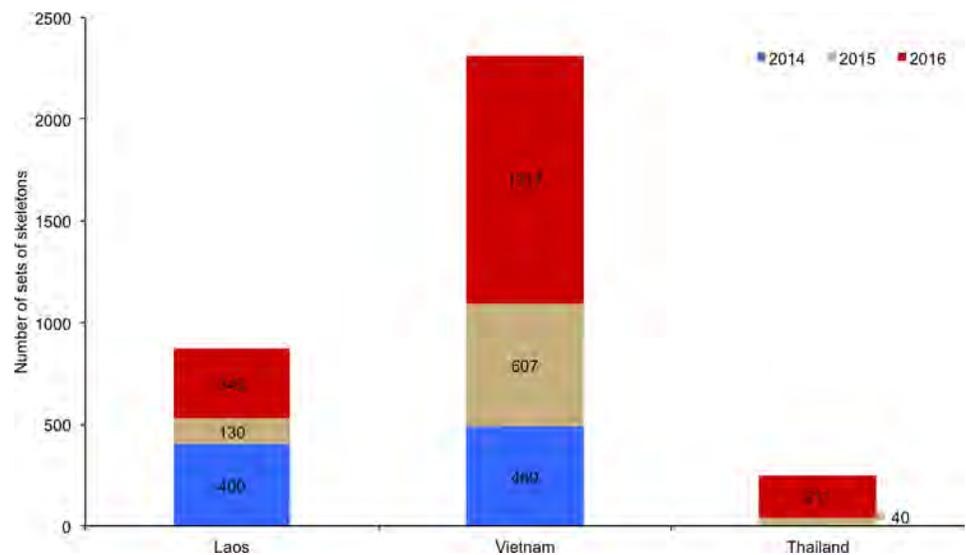


**Fig 2. Actual annual quarterly exports of sets of lion skeletons from South Africa to East-Southeast Asia from 2014±2016, obtained from air waybill records provided by a freight forwarding company handling the exports on behalf of six lion bone traders.**

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Anonymous, pers. comm., July 2017]. In 2011, DEA published the names of six South African exporters and four or five E-SEA importers [73]; we presently know there to be six exporters (five from Gauteng, none of whom own a breeding or hunting facility), only one of whom was listed in the 2011 DEA document.

**Skeletons: Air waybill records.** Information on annual lion skeleton exports to E-SEA in 2014±2016, compiled by the freight forwarding company from the air waybills (AWB) (with the consent of their clients), revealed that 3437 sets of bones weighing 44531kg were exported



**Fig 3. Actual annual exports of sets of lion skeletons from South Africa to Laos, Vietnam and Thailand from 2014±2016, obtained from air waybill records provided by a freight forwarding company handling the exports on behalf of six lion bone traders.**

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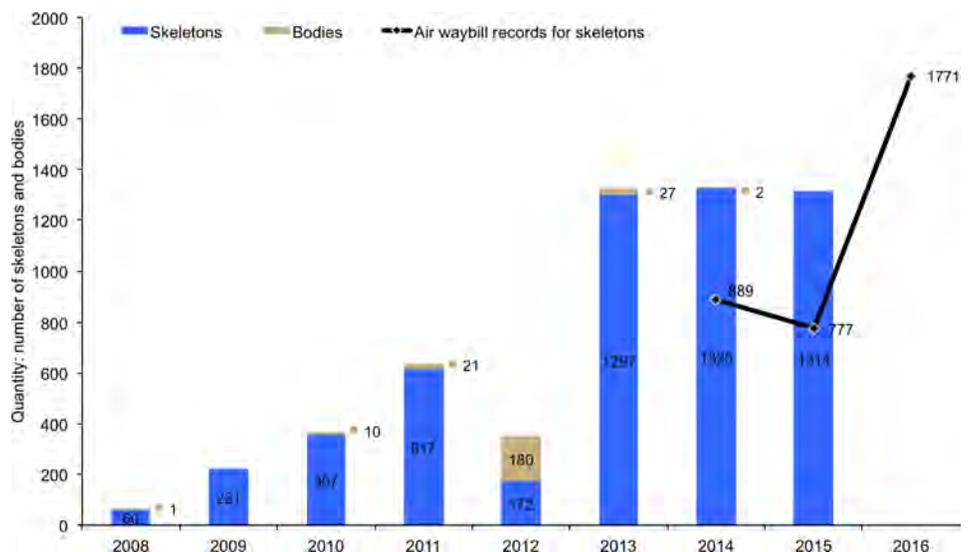
**Table 2. Quantities listed on CITES permits issued by South African provinces to export lion skeletons (SKE) to East-Southeast Asia from 2008±2015.**

Year	Free State	Gauteng	North West	Eastern Cape	Mpumalanga	Limpopo	Unknown	Total SKE
2008	60							60
2009	15				158		48	221
2010	83		221	53				357
2011	116		437	64				617
2012	68		25	77			2	172
2013	282	247	659	48			48	1284
2014	781	439				6	76	1302
2015	618	685						1303
<b>Total no. SKE</b>	<b>2023</b>	<b>1371</b>	<b>1342</b>	<b>242</b>	<b>158</b>	<b>6</b>	<b>174</b>	<b>5316</b>
<b>Total %</b>	<b>38%</b>	<b>26%</b>	<b>25%</b>	<b>5%</b>	<b>3%</b>	<b>0.1%</b>	<b>3%</b>	

<https://doi.org/10.1371/journal.pone.0185996.t002>

to Laos, Vietnam and Thailand in three years: 889 sets in 2014; 777 sets in 2015; 1771 sets in 2016 (Fig 2). Laos received 873 sets (25%), Vietnam 2313 sets (67%), and Thailand 251 sets (7%) (Fig 3). When compared with the CITES permits issued in 2014 and 2015, the actual exports indicate that <70% of what traders applied to export in a calendar year were actually exported (see Fig 4 later).

The effect of the trade restrictions placed on Laos in 2015 is evident from the AWB data. First, total quarterly exports to E-SEA from January to September were lower than in previous years (Fig 2), resulting in an overall drop in exports for 2015 compared to 2014 (see Fig 4 later); and second, the annual exports to Vietnam and Thailand increased (Fig 3). When the trade ban was lifted, exports to Laos rose sharply in the last quarter of 2015, and stayed elevated into the first quarter of 2016 as traders resumed business and tried to catch up on lost sales (Fig 2).



**Fig 4. Combined number of lion skeletons and bodies sourced from Africa and listed on issued CITES permits from 2008±2015 (histogram), compared to air waybill records (black line, South Africa only) for actual exports of skeletons to East-Southeast Asia from 2014±2016. CITES permit records for skeletons and bones represent the maximum permitted annual quantity and not the actual annual exports.**

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The 2016 figures, however, also show a significant increase in actual exported quantities compared to previous years (Figs 2 & 4). Because of prevailing uncertainty in the industry, the surge was partly indicative of the regular availability of skeletons due to farms selling available bones monthly to South African traders rather than stockpiling them to the end of the year (which also means that bones are likely to be wetter, and the average skeleton mass heavier, than estimated by Williams et al [6]). The most evident increase was in the last quarter of 2016 following the October 2016 outcome of CoP17 that a quota on bone exports was to be implemented in 2017. The surge after CoP17 was mostly indicative of traders buying and exporting as many skeletons as possible in anticipation of a zero quota, or a quota that would be lower than the quantities that they knew could be bought from facilities [Anonymous, pers. comm., July 2017].

Another probable reason for the 2016 increase in actual exports, evident from January±September, was the U.S.'s decision to ban their hunters from importing captive origin lion trophies (notification received 19 January 2016). Since U.S. hunters usually represent ±50% of the foreign hunting clients in South Africa [2], and they imported >50% of the farmed lion trophies originating in South Africa [CITES Trade Database], it was predictable that the loss of American clients and the consequent decline in lion hunting would reduce the numbers of skeletons available for export as a by-product of the trophy hunting industry. Hence, there were legitimate concerns that breeding and hunting facilities with a surplus of lions (that were bred and/or kept for trophy hunting that could no longer be sold to foreign hunters), would reduce captive lion numbers by other means (such as euthanasia) and sell the bones±thereby increasing the potential availability of complete skeletons (i.e. with skulls) available for export (and also the average mass thereof). The quantities (sets of skeletons and mass) exported from January to September 2016 before CoP17 show a higher than average increase in exports compared to previous years, and an increase in the average mass per skeleton (see [6]). Actual exports for 2016 are more than double the quantities of previous years, and thus appear to be a reaction to the various trade restrictions that were imposed, proposed and/or anticipated. South African lion bone traders agreed that these are all valid reasons for the 2016 figures [Anonymous, pers. comm., April and July 2017]. It is further noteworthy that, while the international market for South African lion hunts has declined markedly since 2016, the domestic market has allegedly expanded (partially due to hunts being sold at reduced rates); however, South African hunters tend not to take the skulls as trophies, and so complete skeletons from trophy hunted lions are entering the supply chain more frequently [Anonymous, pers. comm., August 2017].

**Bodies: CITES permit records.** There were sporadic permit records of lion bodies exported from Africa to E-SEA prior to 2008 (average  $<1\text{yr}^{-1}$  from 2000±2007). However, quantities listed on the permits increased to ±34 bodies per year from 2008±2014 (Table 1). The total quantity for the period is 241 'bodies' (98% from South Africa; reflects the adjusted data). While 'bodies' exported to regions besides E-SEA might typically resemble the CITES definition of 'body', their inclusion here is because 'bodies' destined for Asia were sometimes described as 'carcasses' on South African permit applications, and/or were confused with skeletons, and were increasingly exported after 2008. We know that trade terms have been applied inappropriately by Issuing Authorities at times and that some 'bodies' are actually sets of bones, possibly including some that were not thoroughly cleaned and prepared and which are therefore heavier than boiled and/or taxidermied specimens. A trader believes that most, if not all, *'bodies on the permits are actually skeletons incorrectly captured'* [Anonymous, pers. comm., July 2017]. The South African provincial exporters of lion bodies annually to E-SEA are in S1 Table.

**Combined exports of skeletons and bodies.** The combined maximum permitted legal export of lion skeletons and bodies from Africa to E-SEA from 2008±2015 (based on permits issued) amounts to 5604 units (SKE & BOD), 50% of which were destined for Laos and 45% to Vietnam (Table 1). The quantities average 322yr<sup>-1</sup> from 2008±2011, but 1322yr<sup>-1</sup> from 2013±2015 (Fig 4). The only African countries reporting legal exports of these products are South Africa, Namibia, Tanzania and Zimbabwe.

The 2014±2015 AWB records are the only confirmations we have of actual exports relative to the permits that were issued by Parties (Fig 4). However, these annual figures must be viewed in the context of interpreting the limitations of the CITES reports, namely that: (i) actual exports do not necessarily occur in the same year that the CITES permit was issued (especially if the permit was issued towards the end of a calendar year, in which case skeletons will be exported at the beginning of the following year), and (ii) the fidelity of the data depends on the accuracy and completeness of the information submitted to the Secretariat (including whether Parties submit their reports for permits that were issued in a calendar year). The 2016 exports confirmed by the South African AWB data (black line in Fig 4) partially show the trajectory of actual trade had the quota not been implemented, albeit with the additional factors in evidence that relate to the various market uncertainties that probably resulted in more annual exports than might have otherwise occurred.

**Wild-sourced or captive-produced?.** Most lion skeletons and bodies originating from South Africa are listed on permits as captive-bred (C) (94% and 69% respectively) (Table 3). In addition, five bodies and 47 skeletons (all wild-sourced) were listed on permits from other African countries. However, the actual proportion of wild-sourced bodies and skeletons from South Africa is less than these data show because some provincial permit Issuing Authorities were, until early 2012, erroneously recording some captive-produced lions as 'wildsourced'. This error happened because certain Issuing Authorities misinterpreted the regulation that lions must be 'free-roaming' for a specified period before they can be hunted. Some took this to mean that captive-bred lions could be considered 'wild-origin' if they were hunted after the mandatory release period set by the province. However, this free-roaming release period before trophy hunters can hunt ranges from four days to 24 months, depending on the South African province (see page 23 Williams et al [2]), and captive-bred lions can never be reclassified as wild. Hence the proportion of 'wild-sourced' lion over the period 2008±2015 is erroneously elevated to an unknown degree and is likely to be closer to zero.

**Purpose of trade.** The purpose of trade listed for most lion skeletons and bodies originating in South Africa from 2008±2015 was commercial (T) (80% and 64% respectively) (Fig 5 insert). However, 'educational' was listed as the sole purpose for skeletons in 2008, 2009 and 2011 (amounting to 850 SKE) (Fig 5), and nearly 30% of the quantity to Laos was for this code (S1 Fig). From 2013, however, the purpose of nearly all skeleton exports was captured as commercial on issued permits (Fig 5).

**Table 3. Number and proportion of wild-sourced and captive-bred lion bodies and skeletons originating in South Africa listed on issued CITES permits and destined for East-Southeast Asia from 2008±2015.**

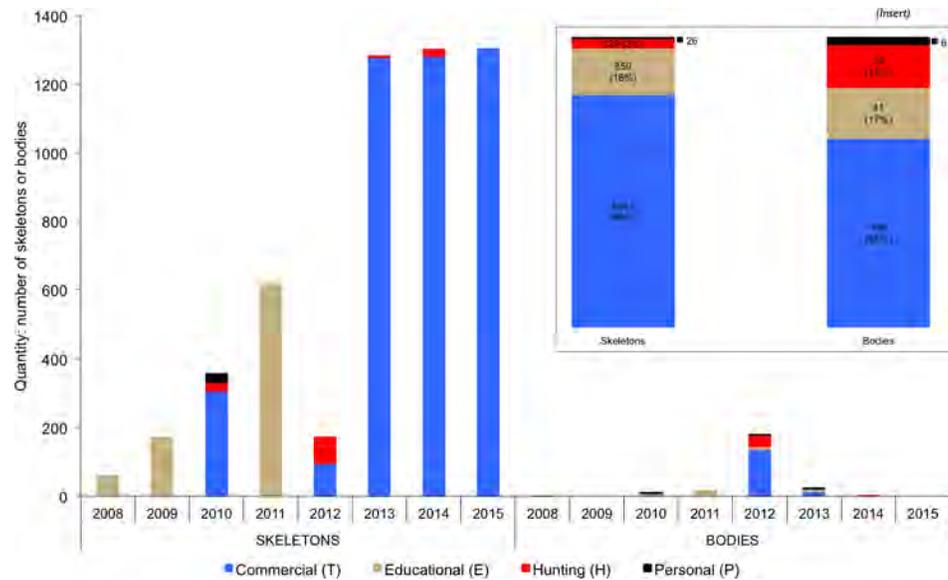
	Wild-sourced (W) <sup>a,b</sup>	Captive-bred (C)	Other <sup>c</sup>	Total
<b>Skeletons</b>	315 (6%)	4981 (94%)	20 (0.4%)	5316
<b>Bodies</b>	71 (30%)	164 (69%)	1 (0.4%)	236

<sup>a</sup> Figures for wild-sourced lion skeletons and bodies from South Africa are elevated to an unknown degree due to a misinterpretation prior to 2012 of the meaning of 'wild'

<sup>b</sup> Excluded from the wild-sourced column are 47 skeletons from Namibia and 5 bodies (from Namibia, Tanzania or Zimbabwe)

<sup>c</sup> 20 Unknown (U); 1 Ratched (R)

<https://doi.org/10.1371/journal.pone.0185996.t003>



**Fig 5. Annual number of lion skeletons and bodies by purpose code originating in South Africa listed on issued CITES permits and destined for East-Southeast Asia from 2008±2015.** In addition, permits for five bodies and 47 skeletons, all for commercial purposes, were issued from other African countries in the same period. The insert shows the total quantity and percentage for skeletons and bodies. See S1 Fig for the purpose codes for skeletons on permits issued to Laos, Vietnam, Thailand and China.

<https://doi.org/10.1371/journal.pone.0185996.g005>

A clue to why the early exports of lion bones were listed as being for ‘educational’ purposes might lie in the investigation of Asia’s animal trafficking network by Davies & Holmes [54]. Companies operating wildlife farms in Laos are alleged to have imported captive-bred tigers, “which was legal as long as they were used for science and education, not for commercial trade” [54]. The Keosavang Trading Company, a Laos-based importer of South African bones, was one of the companies named to be operating a wildlife farm in Laos [54]. Thus, in order to export lion bones legally from South Africa, did traders initially copy the established procedures for purchasing tigers in Asia by declaring consignments ‘educational’?

## Overview

It is evident that the trade in lion bones is a complex issue that spans continents and cultures with a mosaic of stakeholders. From the results of both our investigations (this one and [8]), there appear to be at least three supply-related trade chains in the market for lion bones across Asia and Africa that stimulate and support the demand. First, the legal but rapacious E-SEA trade, derived annually from hundreds of captive-bred South African lions and a limited number of wild-origin ones from other African countries (the latter amounting to 0.9% of the total quantity listed on issued CITES permits to 2015, all from Namibia, Table 1). Second, the same trade to E-SEA, but conducted illegally (e.g. no permits, or sourced by poaching) (not quantified here). And third, the relatively more widespread but comparatively modest, but no less threatening, pan-African utilisation of bones that is mostly for ‘traditional’ purposes and is typically sourced outside South Africa from wild lion populations killed in human-lion conflicts (‘problemlions’) and poaching [8], or in South Africa from poaching of captive-bred lions or sales from captive-facilities to traditional medicine (‘muti’) traders [Anonymous, pers. comm., August 2017]. A South African trader was hesitant when asked about whether more frequent media reports of incidences of lion poaching in South Africa since c.2015 were signs

that there has been an actual rise in poaching attributable to the Asian trade compared to the *muti* trade [Anonymous, pers. comm., August 2017]±hence, substantiated evidence for this is required.

The domestic trade in lion bone is, along with other cultural and socio-economic drivers of lion utilisation, and to different degrees, an anthropogenic threat to wild lion populations across the African continent. The transnational market network is typically supplied through captive-bred and privately-owned lions in South Africa (mostly trophy hunted), or wild lions procured illegally by wildlife harvesters in other countries (to an unknown extent). Since the Asia-driven tiger parts trade provoked and aggravated negative consequences for lions and other large felids, pertinent questions are being asked about how the lion bone trade counter-influences the tiger trade. Furthermore, (i) to what extent is lion poaching that is directly attributable to the Asian and broader pan-African domestic trades occurring in South Africa and other African countries; (ii) what are suppliers and importers doing with the lion bones, (iii) are bones being processed into products prior to export to evade detection and circumvent the mandatory permit regulations (and hence to what extent), and (iv) are lion bones that are processed and sold to Asian consumers being marketed as lion or tiger? Accordingly, these questions merit further scrutiny, as the body of evidence is limited and/or has not been accessed yet.

Regarding the legal global wildlife trade, the CITES Trade Database is the best available source of information; however, there are limitations to using it as a proxy for assessing the actual amount of illegal trade [74] including, that not all illegal transactions are detected and seized, and not all seizures are reported to the Secretariat by Parties. Relatedly, the database (i) is not a suitable proxy for estimating the total number of skeletons in the resource base derived from trophy hunting (for this, one needs to examine national hunting registers [2]), and (ii) is an imprecise proxy for quantifying the total number of skeletons of individual lions entering into the bone trade. CITES trade data obtained from the UNEP-WCMC database have several inherent deficiencies that must be noted in any discussion on their usefulness and accuracy. For example, most CITES permits are issued to traders based on the number of specimens stated in their application documents. As relatively few governments check the actual number of specimens exported, it is usually hard to say whether exports are higher or lower than stated on the permit unless the permits are endorsed. Furthermore, although importing and exporting countries are meant to record the volume of shipments at both ends, this often does not occur and so once again it may be impossible to confirm the volume of actual imports. Confounding CITES data, which generally represents legal trade, is the fact that in some high value species there is often an undocumented parallel illegal trade±the size of which has yet to be assessed for lions. Therefore, to improve confidence in CITES trade data it is necessary to corroborate it by comparison against independent data obtained from field surveys of legal suppliers and/or illegal harvester activities and/or illegal trade in consumer nations±which is what we were partly able to do through access to the AWB records for legal bone exports. The more independent data sets that can be used to check CITES permit data, the better it is for deciding its reliability.

From 2017, South Africa is the only country legally authorised to export lion skeletons to E-SEA±but attempts to illegally procure and trade in lion body parts and bones (from wild and captive lions) will persist (most likely in neighbouring countries [Anonymous, pers. comm. August 2017]), and thus requires vigilance and monitoring. Illegal trade includes attempts to smuggle parts (e.g. teeth and claws, for which there is no quota) and bones to E-SEA and elsewhere that (i) exceeds the allocated quota and does not comply with permit regulations, (ii), originates from other countries, or (iii) are wild-sourced. However, depending on the range state, intercepted illegal consignments might not necessarily originate from wild lions. In

South Africa, provided a ToPS (Threatened or Protected Species) permit has been issued permitting restricted activities for lions (e.g. possessing, buying, moving, receiving, etc), the domestic trade in lion parts is generally legal. Therefore, it is not inconceivable that captive facilities might sell lion parts to persons with ToPS permits who ultimately intend exporting them illegally (as a whole, in parts, or processed).

## Conclusion

The trade in lion bones from South Africa to E-SEA has risen consistently since 2008, as evidenced by the quantities recorded on the issued CITES permits. If actual exports were at least  $\pm 89\%$  of the permitted quantity, then bones from  $\pm 2621$  individual lions were exported from 2008 $\pm$ 2013. In addition, AWB records show that a further 3437 skeletons were actually exported from 2014 $\pm$ 2016, bringing the estimated total from Africa to E-SEA in the period 2008 $\pm$ 2016 to around 6058 skeletons (i.e. no less than 70 metric tonnes, 64% in the last three years from 2014). While the CoP17 annotation restricting trade to captive-origin bones from South Africa only will change the trajectory of legally exported bone quantities, of concern is the trajectory and *modus operandi* for illegal trade since incidences of poaching are recurrently reported across the African continent; these incidences in South Africa, however, mostly end in the removal of teeth, paws and claws from privately-owned lions, seemingly to supply separate markets for these products in Africa and Asia [8; Anonymous, pers. comm., August 2017].

The international trade in lion bones to E-SEA for tonics/medicines coexists with the more widespread trade in lion bones and body parts for mainly zootherapeutic purposes across the African continent [see 8]. In African lion range states with no farmed lions, and/or those with smaller and/or less protected wild populations, vulnerability to poaching is informed by the drivers of trade and the magnitude thereof. While there is minimal evidence to suggest that the East-Southeast Asian bone trade is presently adversely affecting wild lions in protected areas in South Africa, the extent of this specific trade in other lion range states still requires urgent proactive monitoring and evaluation to substantiate and clarify these impacts and also those resulting from the trade in lion body parts for other purposes. And, of particular concern are reports of Asian nationals enquiring about lion bones in Eastern and Southern African lion range states [8], and the evidence of at least one consignment exported from Uganda to Laos in 2016, because this implies deliberate bioprospecting and a more organised and less opportunistic approach to sourcing and acquiring wild lion body parts and bones.

## Supporting information

**S1 Table. South African provincial exporters of lion bodies to East-Southeast Asia from 2008 $\pm$ 2015.**

(PDF)

**S1 Fig. Purpose codes on CITES permits issued for skeletons destined for Laos, Vietnam, Thailand and China.**

(TIFF)

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# Conversation Contents

Information Memo re: Secretarial Meeting with African Conservation Ministries' on Trophy Imports

**Attachments:**

/2. Information Memo re: Secretarial Meeting with African Conservation Ministries' on Trophy Imports/1.1 FWS African Ministries Memo 1.19.18.docx

**"Morris, Charisa" <charisa\_morris@fws.gov>**

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**From:** "Morris, Charisa" <charisa\_morris@fws.gov>  
**Sent:** Fri Jan 19 2018 11:58:26 GMT-0700 (MST)  
**To:** Downey Magallanes <downey\_magallanes@ios.doi.gov>  
Greg Sheehan <greg\_j\_sheehan@fws.gov>, Stephen Guertin <stephen\_guertin@fws.gov>, Jim Kurth <jim\_kurth@fws.gov>, Kashif Askari <kashif\_askari@fws.gov>, Zachariah Gambill <zack\_gambill@fws.gov>, "Larrabee, Jason" <jason\_larrabee@ios.doi.gov>, Aurelia Skipwith <aurelia\_skipwith@ios.doi.gov>, "Foster, Maureen" <maureen\_foster@ios.doi.gov>, Wendy Fink <wendy\_r\_fink@ios.doi.gov>  
**CC:**  
**Subject:** Information Memo re: Secretarial Meeting with African Conservation Ministries' on Trophy Imports  
**Attachments:** FWS African Ministries Memo 1.19.18.docx

Good afternoon, Downey-

Please see the attached information memo, as requested, and let me know if you need any additional information.

Thanks!  
Charisa

--

[Charisa Morris@fws.gov](mailto:Charisa.Morris@fws.gov) | Chief of Staff, Office of the Director | U.S. Fish & Wildlife Service | 1849 C Street NW, Room 3348 | Washington, DC 20240 | (202) 208-3843 | For urgent matters, please dial cell: 301-875-8937



**United States Department of the Interior**  
Washington, D.C. 20240  
**INFORMATION MEMORANDUM FOR THE SECRETARY**

**DATE:** 1/19/18  
**FROM:** Greg Sheehan, Principal Deputy Director, US Fish and Wildlife Service  
**SUBJECT:** Secretarial Meeting with African Conservation Ministries' on Trophy Imports

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**I. INTRODUCTION:**

In preparation for the potential Secretarial meeting with African Conservation Ministries on imports of sport-hunted trophies, the following memo summarizes the U.S. Fish & Wildlife Service's relationship and historical findings with Namibia, Tanzania, Mozambique, Zambia, Zimbabwe and South Africa and Uganda.

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**II. ISSUE BACKGROUND:**

Sport hunting is an effective conservation tool for countries with stable, well-regulated population management that enhance the survival of species in the wild. Several African countries have made significant strides in managing regulated sports hunting, including collecting well researched population data on sports hunted species, including, but not limited to, lion, rhino and elephant.

However, other countries, due to issues of corruption and/or other issues of governance, have yet to develop conservation plans robust enough to ensure that the import of trophies would be compliant with U.S. law. In these instances, the U.S. Fish & Wildlife Service has not been able to issue authorization for imports, but continues to work with these countries to address ongoing issues.

**III. ANALYSIS AND POSITIONS OF INTERESTED PARTIES:**

**Namibia:** Namibia is an excellent demonstration of conservation management and responsible sport hunting programs. Considered the hallmark example, Namibia's wildlife sector is highly transparent and well-regarded. Due to aridity, Namibia has very little suitable habitat for elephants, but has shown recent increases to 22,754 elephants. Namibia has also experienced recent rhino poaching, but remains the second most numerous black rhino country and has been very proactive in responding to and reversing the crisis. The hunting industry and government regulators are, in general, operating to a high standard, and having pioneered innovative programs to return revenue to local residents who harbor wildlife on their communal land. The Service's relationship with the Ministry of Environment and Tourism (MET) is robust and open to enhanced recreational opportunities.

The Service has authorized the import of elephant trophies and a limited number of black rhino trophies that were taken under very specific conditions.

**Tanzania:** While one of the most popular destinations for sport hunting, Tanzania has experienced a sharp decline in accountability regarding the management of wildlife populations. Many issues stem from corruption, and the issuance of illegal permits for unrecorded sport hunts.

For many years, Tanzania had the second largest population of elephants in Africa, but the most recent survey data indicate that Tanzania has lost more than 63% of its elephants in ten years (2006-2015). The country has vast areas set aside for hunting or photographic tourism but unrelenting poaching pressure, corruption, and conflict with people have resulted in depletion. Quotas reports for hunting of these species in country remain ambiguous. However, by the Tanzania Government's own estimates, the famous elephant hunting destination, Selous Game Reserve, dropped from 80,000 elephants to 13,084 in that period. Tanzania's rhinos have collapsed from thousands of animals to only 130 surviving individuals. Although Tanzania has signed the Elephant Protection Initiative, Tanzania has refused to allow an independent audit and inventory of its ivory stockpile – believed to be the biggest in the world with 132 tons of ivory.

The decline in accountability dates back to 2008. Up until 2013, the Service was able to maintain a positive finding for elephant trophy imports from the country. However, Since 2014, the Service has been unable to authorize imports. The US Government and other multilateral donors have attempted to support Tanzania to halt this decline and protect the remaining wildlife, thus far with unimpressive results. That said, the Service remains committed to working with the country's leadership to address persistent issues of corruption and management.

**Mozambique:** Emerging from decades of civil war, the governance of Mozambique remains in flux.

Mozambique has been identified by CITES as a country of concern for uncontrolled ivory and rhino horn trade. The USFWS was petitioned to determine if Mozambique is compromising existing treaties, through a Pelly petition, and is currently evaluating the situation. Elephants in Mozambique are in alarming decline, with recent reports that the primary hunting destination, Niassa Reserve, has only 2,000 elephants left, down from 11,000 a few years ago. Rhinos have been hunted to extinction, and Mozambique is heavily implicated in the trafficking of poached rhino horn out of South Africa to black markets in Asia. The wildlife sector is challenged with large human settlements inside of all of Mozambique's national parks, and lack of resources and capacity in the ministry, and corruption.

Notwithstanding this, the country has taken steps and made improvements in its management structures. But thus far, for the reasons above, the Service has been unable to authorize imports for sport hunting from the country. The Service remains committed to exploring opportunities with the country and hopes to gain a better understanding of its

government structure as the country continues to become more stable so these issues can be addressed.

**South Africa:** The Service has a good relationship with the Department of Environmental Affairs (DEA) which oversees sport hunting in the country. South Africa has an unusual governance structure, in that the wildlife on privately held property is owned by the property owners, and not by the government.

Before improving its wildlife management structures, South Africa eliminated most of its elephants in the early 1900s. The remaining 18,841 elephants are stable, however. Many elephants are under private ownership, on fenced game farms and private reserves. We have allowed the import of elephant trophies and wild lion trophies from the country. However, we have been unable to authorize imports of captive bred lions in that it remains unclear how these hunts support wild lion populations.

South Africa has more than 80% of Africa's surviving rhinos, but since 2009 has experienced a massive increase in rhino poaching activity, which has killed more than 1,000 rhinos per year for the last 3 years. This trend remains an alarming concern for the Service and the conservation community at large.

**Zambia:** Zambia first opened elephant sport hunting in 2005 and it remained open until 2011, improving in management all the while. By 2011, the Service was able to find enhancement for the country and allowed elephant trophy imports. However, the Zambian government shut down sport hunting of elephants of their own volition from 2013 – 2014, reopening in 2015. Reviewing their 2015 data, the Service decided to again allow imports of lion and elephant from 2016 – 2017.

Zambia has around 22,000 elephants. This is a small fraction of the population in recent history, but has held steady for the past decade. The country's rhinos were hunted to extinction in 1994. But with US assistance, they now have a small, highly secured reintroduced, wild population of >30 rhinos (donated from South Africa). In spite of significant hunting revenues, Zambia's wildlife authority has struggled to pay for its own operations and recently reorganized into a department again. We welcome further discussion about their financial sustainability and continued conservation management.

**Zimbabwe:** Prior to 2014, elephant trophies could be imported into the United States. However, due to concern over management, between 2014 – 2015 the Service had negative findings for elephant trophy imports from the country. But as an example of a success story, Zimbabwe has made significant improvements, showcased in their elephant management plans and species census data. Between 2016 – Nov. 14 2017, the Service was able to find enhancement for elephant (and later, lion) trophies. However, with the coup d'état having taken place, the Service has held off on issuing new permits, as we investigate the stability and conservation practices of the new government. Thus far, it appears that the new government shares the old government's conservation practices.

Zimbabwe now has the second largest population of elephants with 82,630 (second to Botswana which has an estimated 131,626 elephants). In the four major elephant populations in Zimbabwe, two (Sebungwe and Zambezi Valley) showed decline in the most recent survey, while two showed stable or increasing populations (Hwange and Gonarezhou). In spite of political instability, economic decline, and an upsurge in poaching, heroic individuals and organizations and landowners have safeguarded key populations of black rhinos. The Service has partnered with these individuals during the past years with very positive results and we hope that the new government in Zimbabwe continues to be an important contributor to conservation.

**Uganda:** Uganda is a heavily settled, human-modified environment with a fraction of its mammal fauna remaining. Its rhino subspecies is extinct in the wild, and elephants number fewer than 5,000 in the whole country. We have strong partnerships with individuals investigating wildlife crime and trafficking of ivory, rhino horn, and pangolin out of Central and East Africa through Uganda.

Lions are in extreme decline, with continent-wide total revised downward to possibly 20,000 individuals. Tanzania, Kenya, Botswana, Mozambique, South Africa, and Zimbabwe have the largest remaining number of individuals, with populations numbering more than 1,000 each. Zambia has fewer than those six countries, but remains an important lion range.

The Service has not had any import applications from Uganda in the past 15 years. Thus far, we have not discussed the potential of ESA listed trophy imports, although it is possible that they may seek to expand their sports hunting to other species. Presently, most of the sport hunting that takes place is for more esoteric species, such as zebra duiker and yellow-back duiker.

# Conversation Contents

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# Conversation Contents

**Fwd: It ain't perfect, but....**

**Attachments:**

/4. Fwd: It ain't perfect, but..../1.1 Wildlife Trafficking Communications Strategy V2.docx

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## "Wainman, Barbara" <barbara\_wainman@fws.gov>

**From:** "Wainman, Barbara" <barbara\_wainman@fws.gov>  
**Sent:** Mon Dec 04 2017 10:52:49 GMT-0700 (MST)  
**To:** Jim Kurth <jim\_kurth@fws.gov>  
**Subject:** Fwd: It ain't perfect, but....  
**Attachments:** Wildlife Trafficking Communications Strategy V2.docx

Barbara W. Wainman  
Assistant Director, External Affairs  
US Fish and Wildlife Service  
(202) 208-5256 (office)  
(571) 471-4159 (cell)

----- Forwarded message -----

**From:** **Shire, Gavin** <[gavin\\_shire@fws.gov](mailto:gavin_shire@fws.gov)>  
**Date:** Sun, Dec 3, 2017 at 6:01 PM  
**Subject:** It ain't perfect, but....  
**To:** Barbara Wainman <[barbara\\_wainman@fws.gov](mailto:barbara_wainman@fws.gov)>, Matthew Huggler <[matthew\\_huggler@fws.gov](mailto:matthew_huggler@fws.gov)>, Craig Hoover <[craig\\_hoover@fws.gov](mailto:craig_hoover@fws.gov)>, Danielle Kessler <[danielle\\_kessler@fws.gov](mailto:danielle_kessler@fws.gov)>, Laury Parramore <[laury\\_parramore@fws.gov](mailto:laury_parramore@fws.gov)>

...it's what I could do in the time. Thanks to Craig, Danielle Kessler, Doug, Lisa and Jeanne Van Lanker for all their help.

Next steps:

1. Logo
2. Theme tune
3. Ticker-tape parade

G

Gavin Shire  
Chief of Public Affairs  
U.S. Fish and Wildlife Service

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# WILDLIFE TRAFFICKING COMMUNICATIONS STRATEGY

## ULTIMATE GOALS

1. Halt the declines and recover populations of elephants, rhinos, pangolins and other species threatened by poaching and wildlife trafficking
2. Reverse the destabilizing impacts that poaching and wildlife trafficking have on governance around the world
3. Expand the Department of the Interior and U.S. Fish and Wildlife Service role as a global leader and source of expertise in combating wildlife trafficking
4. Ensure that the United States, the second largest wildlife consuming country, is not contributing to poaching and wildlife trafficking
5. Provide an opportunity for bipartisan legislative wins

## INTRODUCTION

Elephants, lions, tigers, rhinos and other iconic animals hold a special place in our hearts and minds, a place that crosses partisan, socio-economic and national lines. Despite this universal sentiment, we have been unable to slow the devastating declines in many of the populations of these magnificent creatures. We now face a global wildlife crisis. For many of these species, the primary driver of population declines is the scourge of poaching and wildlife trafficking, resulting in the slaughter of tens of millions of animals every year, which exacerbates other threats, such as loss of habitat and human/wildlife conflict.

This is not just about saving the greatest creatures on the planet. This is about national security; the fight against insurgent groups that destabilize foreign governments; and the opioid and other drug, arms and human trafficking wars that are inextricably linked to wildlife trafficking. Under the *National Strategy for Combatting Wildlife Trafficking*, DOI/FWS has been a significant player in the push to regain ground in the war to save wildlife. We can do more.

The recent national outcry against elephant and lion trophy hunting, while understandable at an emotional level, is misplaced in the conservation context. But the heightened national awareness that now exists creates opportunity: opportunity to become part of and thereby change the dialog, focus the public's emotion on the real threats; opportunity to turn public support into action; opportunity to make bipartisan governance decisions; opportunity to work across federal agencies and bureaus on a single, clear, righteous issue with a real possibility of success; opportunity to work with for-profit corporations, national governments and NGOs to deliver conservation results; and opportunity to put U.S. expertise on the ground where it can lead the global effort to combat poaching and wildlife trafficking.

## OVERARCHING STRATEGY

This effort will bring attention to tactics and actions already being undertaken as part of the National Strategy and help further expand capacity.. We will focus on four strategic fronts:

**Strategy 1 – Public education and mobilization:** America is the second largest consumer of wildlife and wildlife products. Public understanding of the issue, its causes and solutions, is fundamental to effecting change. We will:

- a. Frame and lead the discussion
- b. Focus on positive actions individuals and organizations can take on both the demand and supply side
- c. Engage other voices to amplify our message
- d. Communicate our successes and generate public engagement

**Strategy 2 – Funding:** There is a huge imbalance in resources available to those fighting wildlife traffickers compared with those possessed by the traffickers themselves. We can address this discrepancy by generating new sources of funding for prevention while cutting off funding for criminal cartels. We will:

- a. Push for legislation that generates sustainable, deficit-neutral funding
- b. Disrupt funding sources of traffickers
- c. Help facilitate sustainable income streams that replace the income locals desperately need and currently get from poaching

**Strategy 3 – National and international collaboration and partnerships:** We cannot win this fight alone. It requires a sustained and coordinated international effort involving range states and transit and consumer nations as well as domestic and international private and NGO partners. We will:

- a. Engage in critical global dialog with range states and consumer nations
- b. Provide support, expertise and innovation to other countries
- c. Work with international partners to deliver consistent international messaging
- d. Engage private sector partners to expand our conservation reach
- e. Strengthen CITES efforts to combat wildlife trafficking and ensure that wildlife trade is legal and sustainable

**Strategy 4 – Enforcement mobilization:** On-the-ground action, in tandem with leading the modernization of wildlife intelligence, is critical in stopping poachers in the field and traffickers wherever they hide. We will:

- a. Communicate our victories at home and abroad
- b. Expand our enforcement capacity
- c. Seek support for new enforcement avenues, including military
- d. Develop technological advances, including a world-class wildlife intelligence infrastructure
- e. Increase foreign capacity to combat wildlife trafficking

## **IMMEDIATE TACTICS AND ACTIONS**

**Tactic 1: Change the dialog:** The anger and aggression toward trophy hunting is detracting from the real threats to the conservation of these species, particularly poaching and wildlife trafficking. We need to get the debate back on track and redirect public attention to the greatest threats facing wildlife today.

**Action:** Announce the hold on the positive Zimbabwe lion and elephant findings, using it as an opportunity to frame and message the issue; Similarly announce Tanzania findings when they are completed.

- Send out a well-messaged news release to a comprehensive media list
- Re-engage on social media to counter misinformation and incorrect assertions
- Post key information and messages to the FWS website home, international and law enforcement pages
- Post one or more blogs explaining the issue in clear, resonant, common language
- Set up interviews for Greg Sheehan/Secretary Zinke with the New York Times, Washington Post, Fox News, CNN and/or other major news outlets (use previously crafted messages and TPs)

**Action:** Rebrand/recast the International Wildlife Conservation Council

- Republish in the Federal Register with changes to the mandate to reflect broader scope
- Talk to key wildlife NGO partners to reassure them of the intended purpose and desired dynamic of the council, and invite them to participate
- Proactively identify and recruit target organizations for membership
- Place a secretarial (or joint partner) op-ed in a key publication explaining the council's purpose
- Invite media to the first council meeting

**Tactic 2: Establish DOI-FWS leadership:** No other organization has the experience, skillset, reach and influence that exist in the Department of the Interior and U.S. Fish and Wildlife Service when it comes to the issue of wildlife trafficking. The partnerships we have established and our track record of success can be greatly expanded to put the Department out in front of this issue globally.

**Action:** Begin a high-profile outreach campaign aimed at changing behaviors

- Identify and recruit new partners to leverage a campaign, including shared messaging, coordinated campaigns, co-branding on materials/videos/events, etc.
- Open the planned BWI wildlife trafficking exhibit with a ceremony involving the Secretary
- Start a dialog with other airports/public places on similar exhibits
- Create a series of TV PSAs with the Secretary
- Secretarial attendance at March 3 UN event and/or Jackson Wildlife Film Festival in celebration of World Wildlife Day (big cat theme)
- Undertake a targeted campaign with JetBlue, United Airlines and other carriers and travel companies to educate travelers and reduce purchases of illegal wildlife

- Identify new partners for the Be Informed, Buy Informed travel guides

**Action:** Engage international leaders

- Invite African leaders to a wildlife trafficking summit in Washington (or Las Vegas) in February when those leaders are in America for the SCI conference
- Conduct follow up visits to AFRICOM to discuss USFWS enforcement activity throughout Africa and future engagement
- Secretarial or FWS Principal Deputy Director attendance at SCI Convention in February to engage international counterparts from Africa

**Action:** Engage domestic partners

- Working through the Green Sports Alliance, begin dialog with key professional sports teams that use wildlife as mascots or symbols. Investigate creation of a competitive league among teams for who can do the most for wildlife
- Hold first IWCC meeting
- Hold roundtable with member organizations of the Wildlife Trafficking Alliance (eBay, Google, etc.)
- Identify key domestic NGO organizations and influencers (those not represented on the IWCC), and host a summit meeting (similar to the Ramp Up Access Summit) to begin engagement and garner positive media attention for DOI/FWS efforts to craft solutions to the issues

**Tactic 3: Engage Congress as part of the solution:** DOI leadership can be used to move lawmakers to make game-changing legislation that helps turn the tide against traffickers and poachers by facilitating international collaboration, creating dedicated anti-trafficking funds

**Action:** Cultivate Congressional champions (including Reps. Royce and Poe, and Sens. Coons and Flake)

- Arrange for Greg to meet with members to discuss FWS and DOI's commitment to combating wildlife trafficking, and new strategy for continued engagement.
- Ask members to find venues on Capitol Hill for major FWS announcements and events.
- Identify opportunities to invite members to participate in FWS events.
- Ask members to provide quotes for key FWS announcements and press releases related to combat wildlife trafficking.
- Continue to offer assistance for member CODELs, hearings, briefings, legislative efforts, etc.

**Action:** Assist with legislative proposals

- Reauthorization of the Multinational Species Conservation Funds
- Reauthorization of the Multinational Species Conservation Funds Semipostal Stamp (Tiger Stamp)

- Legislation to allow the U.S. government to deny visas to foreigners who have committed wildlife trafficking crimes
- Legislation to strengthen the provision that makes wildlife trafficking a predicate offense for money laundering in the END Wildlife Trafficking Act.
- Legislation to direct the development of a national database for intelligence on wildlife trafficking, led by FWS OLE LEMIS database.
- Legislation creating a new grant fund administered by FWS specifically targeted to efforts to combat wildlife trafficking that is authorized to accept donations from non-federal sources.

**Tactic 4: Turn the dial on the ground:**

**Action:** Modernize and expand intelligence and operational capabilities

- Request the Director of National Intelligence publicly support and endorse the implementation of a proven, game-changing information technology infrastructure currently in prototype form
- Place an attaché at the U.S. Embassy in Jakarta, Indonesia, to provide support to our key allies in Southeast Asia and support our fight against wildlife trafficking in this strategically important region
- Conduct multiple training missions, beginning with training of mid- to high-level investigators and rangers from Kenya and Uganda
- Hold a roundtable of U.S. military leaders to discuss their potential role
- Begin staffing newly created positions for wildlife trafficking at the Special Operations Division and the Organized Crime Drug Enforcement Task Force (OCDETF)
- Announce the creation and staffing of the first Wildlife Intelligence Unit

**Action:** Provide technical and financial assistance to combat wildlife trafficking on the ground in producer, transit and consumer countries

- Post Notices of Funding Opportunities for the Multinational Species Conservation Funds, regional programs and combating wildlife trafficking program to target financial assistance to the most critical species, places and issues that are threatening species loss due to poaching and wildlife trafficking.
- Begin preparations for the 18th Meeting of the Conference of the Parties to CITES to be held in Sri Lanka in 2019, including publication of a series of Federal Register notices soliciting information from the public on species listings and implementation of the treaty.

**PRIMARY CAMPAIGN MESSAGES**

- Poaching and wildlife trafficking must be stopped if elephants, rhinos, tigers, pangolins and other beloved animals are to continue to roam the planet. Stopping it needs to be a global effort, but every American can play a part. We need you to help!

- The poverty rife across Africa and Asia creates an economic void that is now filled by the exploitation of wildlife for easy money. Together with range states, we must provide other incentives that fill this void.
- This is a U.S. national security issue. The fight against wildlife trafficking is intrinsically entwined with our fight against opioid and other drug, arms and human trafficking, corruption and other forces that destabilize developing nations and
- The North American Model is the single greatest asset to wildlife conservation in America today. It is responsible for turning around a similarly dire situation that existed here for iconic U.S. wildlife species and maintaining millions of acres in nature for wildlife and people. This gold standard model can serve as an example for other nations to preserve their special places and the unique animals that live there.
- America leads the world in preventing wildlife crime and catching the perpetrators. Our law enforcement and military expertise can stop poachers in the field, shut down trafficking cartels and bring criminals to justice.

## **SECONDARY MESSAGES**

### **Trophy Hunting in Africa**

- We recognize that some people feel passionately that hunting elephants and lions is unnecessary and incompatible with their values. We do not dismiss those concerns; however, our mission is to conserve species in the long term so that our children and future generations can live on a planet where elephants, lions and other animals still roam.
- Conservation is about making difficult decisions. Our job is to ensure African trophy hunting programs are well-managed and help combat the real threats to elephants and lions – habitat loss and poaching for the illegal wildlife trade.
- Like us, African countries are passionate about conserving their wildlife for future generations. This commitment is shared by the U.S. hunting community that has done so much for the conservation of wildlife here in America and around the world. Funds generated by U.S. hunters can be the backbone of conservation efforts in Africa, helping combat the scourge of poaching and wildlife trafficking that is threatening Africa's wildlife.
- Well-managed trophy hunting has been demonstrated as a valuable conservation tool as part of a comprehensive wildlife conservation program. It can and does provide much needed funds to stop poaching to supply illegal wildlife trade, protect habitat from deforestation and unregulated grazing practices, and generate millions of dollars to benefit conservation and support local economies. Independent organizations such as the Wildlife Society and the International Union for Conservation of Nature (IUCN) have stated that well-managed hunting can and does benefit species.

### **Law Enforcement**

- The United States is a global leader in the fight against wildlife trafficking. Wildlife inspectors at ports work to ensure imports are legal and block those that aren't. Special agents investigate wildlife crimes under special operations such as Operation Crash, Operation Jungle Book and Operation Journey, and track perpetrators around the world, working with the Department of Justice to bring criminals to trial.
- The Service's forensics lab is unique in the world and at the vanguard of criminal investigative science. The cutting edge technology and techniques specific to wildlife crime it has developed over the years have been used by many other countries to catch and prosecute criminals.
- The Service's Wildlife Detector Dog program uses dogs' acute sense of smell to sniff out wildlife crime. These specially trained canines are not just man's best friend, but wildlife's too.
- The Service has special agent attachés posted at U.S. embassies in Beijing, China; Libreville, Gabon; Bangkok, Thailand; Gaborone, Botswana; Lima, Peru; and Dar es Salaam, Tanzania. By stationing these experts around the world in strategic international locations, the Service has bolstered ongoing international partnerships to protect the world's wildlife from poaching and illegal trade. The Service continues to work with the U.S. Department of State (DOS) to place additional special agent attachés.

### **International Conservation**

- The Service delivers critical financial resources to address the greatest conservation needs around the world, helping to combat poaching and wildlife trafficking in range countries as well as transit and consumer countries.
- We strengthen protected area management, provide resources to support rangers and increase patrolling, and provide incentives for local communities to live with and benefit from wildlife.
- We support conservation of elephants, rhinos, tigers, sea turtles and great apes through our Multinational Species Conservation Funds, targeting critical resources to the places where these species are most at risk, including the threats of poaching and wildlife trafficking.
- We also have a specialized financial and technical assistance program for combating wildlife trafficking and strengthening CITES implementation, delivering approximately \$5 million to address the most critical conservation needs globally.
- In addition, our regional programs also deliver critical financial and technical support to address the most important conservation issues in Africa, Eurasia, Mexico, South America and the Caribbean, where poaching and wildlife trafficking threaten hundreds of at risk species.
- As the U.S. Government lead for CITES, the Service spearheads efforts to strengthen CITES implementation, ensure that measures are in place to combat illegal and unsustainable trade, push countries to live up to their international commitments, and hold them accountable when they fail to do so.

## Conversation Contents

Updated BP on lion trophies

**Attachments:**

/8. Updated BP on lion trophies/1.1 Inf memo lion and elephant hunting 8-3-17 final.docx

**"Guertin, Stephen" <stephen\_guertin@fws.gov>**

---

**From:** "Guertin, Stephen" <stephen\_guertin@fws.gov>  
**Sent:** Thu Aug 03 2017 08:57:28 GMT-0600 (MDT)  
**To:** Greg Sheehan <greg\_j\_sheehan@fws.gov>  
**CC:** Jim Kurth <Jim\_Kurth@fws.gov>, Charisa Morris <charisa\_morris@fws.gov>  
**Subject:** Updated BP on lion trophies  
**Attachments:** Inf memo lion and elephant hunting 8-3-17 final.docx

Greg

In addition to the update on the Feld Entertainment issue, the ASFWP requested an updated BP on the lion trophy issue, attached for you.

## INFORMATION/BRIEFING MEMORANDUM FOR THE DEPUTY SECRETARY

DATE: August 3, 2017

FROM: Greg Sheehan, Acting Director, U.S. Fish and Wildlife Service

SUBJECT: Lion and Elephant ESA listings and the permitting process

The purpose of this memorandum is to provide background on lion and elephant listings under the Endangered Species Act (ESA), the process for obtaining authorization under the ESA to import sport-hunted trophies, and the status of ESA findings for certain African countries.

### BACKGROUND

In December 2015, The U.S. Fish and Wildlife Service (Service) listed the lion subspecies *Panthera leo leo*, located in India and west and central Africa, as endangered and listed *Panthera leo melanochaita*, located in eastern and southern Africa, as threatened. The Service also finalized a 4(d) rule for *Panthera leo melanochaita* that included the requirement that an import permit would need to be obtained prior to the import of any lion specimen.

The African elephant is listed as threatened (throughout its range) under the ESA and trade in African elephant specimens is regulated by a Section 4(d) rule of the Act (50 CFR 17.40(e)). On June 6, 2016, the Service published a final rule amending the Section 4(d) rule to, among other things, require the issuance of an ESA permit for all imports of African elephant trophies and ivory.

The Service's International Affairs Program (IA) is responsible for making the required findings for both species prior to issuing an import permit. IA issued a total of 10,700 permits in the first half of last year for all activities for which it has permit issuance responsibility. In the half of this year, IA has issued approximately 21,000 permits.

Secretary Zinke hosted a meeting with several sport-hunting stakeholder groups on July 11, where import of sport-hunted lions and elephants were discussed. As an outcome of that meeting, the Service is evaluating the recommendations of these groups and intends to hold follow-up discussions to determine how we can more effectively work together to ensure that hunting is contributing to conservation of these species.

### DISCUSSION

In accordance with Service regulations for the implementation of the ESA (50 CFR 17.33), in order to issue an import permit for a personally hunted lion trophy, the applicant must demonstrate that the import of a sport-hunted lion trophy would enhance the propagation or survival of the species in the wild. However, for most sport-hunted trophy imports, the hunter typically does not have access to all of the information the Service needs to make a positive "enhancement finding." To address this issue, the Service undertakes direct efforts to gather the

information necessary to determine whether an “enhancement finding” can be made. To do so, the Service contacts the wildlife authority within the country where the trophy was taken to obtain information on the status of the species within the country, the management program for the species and how sport hunting is integrated into that management plan, how funds generated through hunting contribute to the conservation of the species, how local communities benefit from hunting operations, and other relevant information. Likewise, sport-hunted trophies of African elephants may only be authorized if the Service is able to find that the killing of the trophy animal will enhance the survival of the species, as called for in the 4(d) rule (50 CFR 17.40(e)).

Historically, more than 90% of sport-hunted lion trophies (approximately 400 per year) have been imported to the United States from South Africa. Therefore, the Service prioritized making an enhancement determination for South Africa. In October 2016, we completed a positive enhancement finding for “wild” and “wild-managed” lions from South Africa and a negative finding for “captive” lions. To date, the Service has authorized the import of nine wild/wild-managed lion trophies from South Africa taken in 2016. We have also denied five applications for the importation of captive-bred lions taken in South Africa in 2016.

Although initial findings for lions have taken more time than anticipated, in part due to the lack of information from the countries involved, once these findings are in place and baseline information has been obtained, we expect that additional country-level findings will require far less time.

As of August 3, 2017, we have the following pending applications for lions:

Mozambique –	3 applications for lions taken in 2016 or 2017
Namibia –	1 application for lion to be taken in 2017
Tanzania –	17 applications for lions taken in 2016 or 2017
South Africa –	11 applications for wild/wild-managed or captive-bred lions taken in 2017
Zambia –	17 applications for lions taken in 2016 or 2017
Zimbabwe –	17 applications for lions taken in 2016 or 2017

As of August 3, 2017, we have the following pending applications for elephants:

Namibia –	8 applications for elephants taken in 2014 (2 renewals), 2016 and 2017
Tanzania –	2 applications for elephants taken in 2016
South Africa –	7 applications for elephants taken in 2016 and 2017
Zambia –	1 applications for elephants taken in 2017
Zimbabwe –	37 applications for elephants taken in 2014 (3), 2016 or 2017

With regard to sport-hunted elephants, we currently have positive findings for the import of trophies from South Africa and Namibia. In 2014 and 2015, we completed negative findings for Tanzania and Zimbabwe, countries for which we previously had positive findings. We have not authorized the import of sport-hunted elephant trophies for any other countries that currently allow sport hunting. We are currently under litigation for our negative findings for both Tanzania and Zimbabwe.

## NEXT STEPS

Status of lion and elephant enhancement findings:

Mozambique – The Service has received information from Mozambique for both elephants and lions, and we are currently reviewing the material regarding the status of lions within the country and the management program that is currently in place for the species. Draft findings are underway.

Namibia – The Service has a positive finding for elephants. The Service has requested information regarding lions from Namibia on several occasions, but has not received any information regarding status of the lions in the country or the management regime for the species. Namibia has promised to provide that information as soon as possible, and we will undertake a review of that information when it is received.

Tanzania – The Service has received information from Tanzania regarding the status of lions and elephants and their management programs. The material has been reviewed and we anticipate completing these findings by the end of August.

South Africa – The Service has a positive finding for elephants. Based on information received from South Africa and other sources, the Service made a positive finding for wild/wild-managed lions taken in 2016 and a negative finding for captive-bred lions taken in 2016. We are currently revising the finding for wild/wild-managed lions taken between 2017 and 2019 (South Africa's lion management plan for wild/wild-managed lions is valid until the end of 2019). We have received no new information for captive-bred lions that would change our current negative finding. The new finding will be completed this week and we will proceed to issue or deny applications immediately.

Zambia – The Service has received information from the Zambia Wildlife Authority on the status of lions in Zambia and their hunting programs for both lions and elephants. We have reviewed this information and have a draft finding that is currently being reviewed. We anticipate completing the finding by mid-August.

Zimbabwe – The Service has received and reviewed the information provided by Zimbabwe for both elephants and lions. We have completed a new elephant finding and are developing a communications plan and *Federal Register* notice to announce this finding in August. A draft finding for lions is underway.

## ATTACHMENTS

None

# Conversation Contents

Re: New RIN assignments

**"Patel, Kashyap" <kashyap\_patel@fws.gov>**

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**From:** "Patel, Kashyap" <kashyap\_patel@fws.gov>  
**Sent:** Tue Nov 14 2017 08:59:07 GMT-0700 (MST)  
**To:** "Craghead, Anissa" <anissa\_craghead@fws.gov>  
Michael Gale <michael\_gale@fws.gov>, Susan Wilkinson  
**CC:** <susan\_wilkinson@fws.gov>, Megan Apgar  
<megan\_apgar@ios.doi.gov>, Jim Kurth <jim\_kurth@fws.gov>  
**Subject:** Re: New RIN assignments

Hi Anissa,

I talked to Jim. Go ahead and do whatever needs to be done so we can make the fall agenda. These dates seem to have the least consternation among everyone involved and they don't us from executing even faster than these targeted dates.

Please let us know if anything threatens our ability to publish in the fall agenda.

Thanks so much for looking out for us!  
Kashyap

On Tue, Nov 14, 2017 at 7:49 AM, Craghead, Anissa <[anissa\\_craghead@fws.gov](mailto:anissa_craghead@fws.gov)> wrote:

Hi, Kashyap. Are the projected publication dates for RINs 1018-BC93, 1018-BC94, and 1018-BC95 settled? I ask because the longer it takes to settle on dates, the greater the chance that these RINs will not appear, or could appear with incorrect information, in the Fall unified agenda.

In ROCIS (the database that tracks RINs for OMB), these RINs are marked as "future RINs," that is, not publishing in the Fall agenda because we haven't settled on projected publication dates. Being in "future RIN" status allows FWS to make updates to the RINs; as soon as we make them "active" RINs (that is, RINs that will appear in the next published agenda), we cannot make updates to them. We can ask GSA to make small changes to our active RINs on our behalf, but even that option is very quickly coming to a close. **I do not have a hard date for last changes.** As far as I know, and Megan Apgar (Exec Sec) may know more about this, OMB wants to publish the agenda in late November. As such, if we don't get the dates settled now, these RINs may not appear, or may appear with incorrect information, in the published agenda.

I need to know:

1. Are the following projected publication dates accurate?

1018-BC94 (Revising the Endangered Species Act Section 4(d) Rule for the African Elephant): **01/00/2018** (note: this may be difficult to achieve due to the time required for the clearance process together with the upcoming holidays)

1018-BC95 (Revising the Endangered Species Act Section 4(d) Rule for the African Lion):  
**02/00/2018**

2. If the projected publication dates haven't been finalized, does the DO want to change the status of the RINs from "future" to "active" now anyway, so that the RINs will publish in the Fall 2017 unified agenda, even if the information that publishes ends up being inaccurate?

Megan or Sue, do you have anything to add?

Thanks,  
Anissa

On Mon, Nov 13, 2017 at 11:01 AM, Patel, Kashyap <[kashyap\\_patel@fws.gov](mailto:kashyap_patel@fws.gov)> wrote:  
Hi Anisa,

I think we're going to set up 15-30 minutes for Jim, Shaun and Gary to discuss new proposed dates, and the utility of maybe breaking down the dates Greg saw in terms of program time, DO time and FWP time in the process. If we do, it may be helpful to have you on the line. I'll let you know.

Thanks,  
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Thanks, Michael!  
Kashyap, I'm working from home today (b)(6) if you want to talk. Otherwise, we can email.

Anissa

On Mon, Nov 13, 2017 at 10:25 AM, Michael Gale <[michael\\_gale@fws.gov](mailto:michael_gale@fws.gov)> wrote:  
+ Kashyap Patel

Kashyap is running point on this while he is acting as Deputy Chief of Staff this week.

Greg wanted to see if we could tighten these timelines, but the programs are not sure that is feasible. Kashyap has the specifics and can walk through them with you over the phone or email.

Michael

--

Michael Gale

Deputy Chief of Staff (Acting), Director's Office  
U.S. Fish and Wildlife Service

202.208.4923 (office)  
571.982.2158 (cell)

On Nov 13, 2017, at 9:27 AM, Craghead, Anissa <[anissa\\_craghead@fws.gov](mailto:anissa_craghead@fws.gov)> wrote:

Hi, Michael.

I had no idea Charisa was going to be out. Can you please read this email string and let me know if a decision has been made regarding the projected publication dates of the three new RINs (BC93, BC94, and BC95)?

Thanks,  
Anissa

----- Forwarded message -----

From: **Craghead, Anissa** <[anissa\\_craghead@fws.gov](mailto:anissa_craghead@fws.gov)>

Date: Mon, Nov 13, 2017 at 9:24 AM

Subject: Re: New RIN assignments

To: "Morris, Charisa" <[charisa\\_morris@fws.gov](mailto:charisa_morris@fws.gov)>

Hi, Charisa. Were decisions ever made about the projected publication dates of these proposed rule actions? In order for them to be included in the Fall 2017 agenda (if that is still possible---I don't know), we need to input the correct information as soon as possible.

Thanks,  
Anissa

On Tue, Nov 7, 2017 at 5:15 PM, Morris, Charisa <[charisa\\_morris@fws.gov](mailto:charisa_morris@fws.gov)> wrote:

Good afternoon, folks-

I have given FWP a heads up that Greg needs to have a discussion with them about reasonable timelines associated with these RINs. At this point, I have the following to suggest to Greg as reasonable timelines, per your responses to this thread:

1018-BC93 (Compatibility Regulations Pursuant to the National Wildlife Refuge System Improvement Act of 1997): **03/00/2018**

1018-BC94 (Revising the Endangered Species Act Section 4(d) Rule for the African Elephant): **TBD, after a discussion with Greg**

1018-BC95 (Revising the Endangered Species Act Section 4(d) Rule for the African Lion): **2/00/2017**

Let me know if these work, and we can try to work with FWP to clarify expectations.

Thanks,  
Charisa

On Tue, Nov 7, 2017 at 7:38 AM, Craghead, Anissa <[anissa\\_craghead@fws.gov](mailto:anissa_craghead@fws.gov)> wrote:

The "00" in the date means that it could be any day in the month, and

it's the way the database accepts dates unless you have a specific publication date and Federal Register citation to report.

Because, according to Charisa, Greg has expressed the following publication expectation:

- Lion target publication date is 12/15/17
- Elephant and refuges target publication date is 1/15/17 [sic]

I inserted the 01/00/2018 publication projection for your proposed rule. If you negotiate a different date with the Director's Office for your proposal, please let me know, and I'll update it in the database.

Anissa

On Tue, Nov 7, 2017 at 7:32 AM, Cynthia Martinez <[cynthia\\_martinez@fws.gov](mailto:cynthia_martinez@fws.gov)> wrote:

Since I don't know what day 00 is and we have been informed that no packages will be moving between December 15th and January 4th, We should push the Refuge one out to March 30, 2018.

Cynthia

On Nov 6, 2017, at 4:21 PM, Craghead, Anissa <[anissa\\_craghead@fws.gov](mailto:anissa_craghead@fws.gov)> wrote:

In ROCIS, I changed the projected publication dates as follows:

1018-BC93 (Compatibility Regulations Pursuant to the National Wildlife Refuge System Improvement Act of 1997): 01/00/2018

1018-BC94 (Revising the Endangered Species Act Section 4(d) Rule for the African Elephant): 01/00/2018

1018-BC95 (Revising the Endangered Species Act Section 4(d) Rule for the African Lion): 12/00/2017

On Mon, Nov 6, 2017 at 3:57 PM, Morris, Charisa <[charisa\\_morris@fws.gov](mailto:charisa_morris@fws.gov)> wrote:

Greg has expressed the following publication expectation:

- Lion target publication date is 12/15/17
- Elephant and refuges target publication date is 1/15/17

Please let me know if you need to visit with him about these dates before they are shared.

Thanks,  
Charisa

On Mon, Nov 6, 2017 at 12:05 PM, Craghead, Anissa <[anissa\\_craghead@fws.gov](mailto:anissa_craghead@fws.gov)> wrote:

1018-BC93: Compatibility Regulations Pursuant to the National Wildlife Refuge System Improvement Act of 1997

1018-BC94: Revising the Endangered Species Act Section 4(d) Rule for the African Elephant

1018-BC95: Revising the Endangered Species Act Section 4(d) Rule for the African Lion

**Megan, does Stu need to review these before Liz takes them out of future RIN status?**

*Please note:*

I received direct input from IA on BC94, but I didn't hear from Refuges or ES for the other two RIN assignments.

For all three proposed rules, I set the projected publication date at 02/00/2018, based on the (incomplete) information I have. These may be incorrect.

For all three proposed rules, I set the priority as "substantive, not significant," but this may be incorrect. I don't have definitive information for that field.

Agenda review reports are attached.

--

[Charisa Morris@fws.gov](mailto:Charisa.Morris@fws.gov) | Chief of Staff, Office of the Director | U.S. Fish & Wildlife Service | [1849 C Street NW, Room 3348](#) | Washington, DC 20240 | (202) 208-3843 | For urgent matters, please dial cell: 301-875-8937

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[Charisa Morris@fws.gov](mailto:Charisa.Morris@fws.gov) | Chief of Staff, Office of the Director | U.S. Fish & Wildlife Service | [1849 C Street NW, Room 3348](#) | Washington, DC 20240 | (202) 208-3843 | For urgent matters, please dial cell: 301-875-8937

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Kashyap Patel  
Management Analyst  
Division of Policy, Performance, and Management Programs  
U.S. Fish and Wildlife Service  
Telephone: 703-358-1957  
Fax: 703-358-1997

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Kashyap Patel  
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Telephone: 703-358-1957  
Fax: 703-358-1997

## "Craghead, Anissa" <[anissa\\_craghead@fws.gov](mailto:anissa_craghead@fws.gov)>

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**To:** "Patel, Kashyap" <[kashyap\\_patel@fws.gov](mailto:kashyap_patel@fws.gov)>  
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**Subject:** Re: New RIN assignments

I've contacted our liaison at GSA-RISC. I will let you know when I hear back from her.

On Tue, Nov 14, 2017 at 10:59 AM, Patel, Kashyap <[kashyap\\_patel@fws.gov](mailto:kashyap_patel@fws.gov)> wrote:  
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Anissa

----- Forwarded message -----

From: **Craghead, Anissa** <[anissa\\_craghead@fws.gov](mailto:anissa_craghead@fws.gov)>  
Date: Mon, Nov 13, 2017 at 9:24 AM  
Subject: Re: New RIN assignments  
To: "Morris, Charisa" <[charisa\\_morris@fws.gov](mailto:charisa_morris@fws.gov)>

Hi, Charisa. Were decisions ever made about the projected publication dates of these proposed rule actions? In order for them to be included in the Fall 2017 agenda (if that is still possible---I don't know), we need to input the correct information as soon as possible.

Thanks,  
Anissa

On Tue, Nov 7, 2017 at 5:15 PM, Morris, Charisa <[charisa\\_morris@fws.gov](mailto:charisa_morris@fws.gov)> wrote:

Good afternoon, folks-

I have given FWP a heads up that Greg needs to have a discussion with them about reasonable timelines associated with these RINs. At this point, I have the following to suggest to Greg as reasonable timelines, per your responses to this thread:

1018-BC93 (Compatibility Regulations Pursuant to the National Wildlife Refuge System Improvement Act of 1997): **03/00/2018**

1018-BC94 (Revising the Endangered Species Act Section 4(d) Rule for the African Elephant): **TBD, after a discussion with Greg**

1018-BC95 (Revising the Endangered Species Act Section 4(d) Rule for the African Lion): **2/00/2017**

Let me know if these work, and we can try to work with FWP to clarify expectations.

Thanks,  
Charisa

On Tue, Nov 7, 2017 at 7:38 AM, Craghead, Anissa  
<[anissa\\_craghead@fws.gov](mailto:anissa_craghead@fws.gov)> wrote:

The "00" in the date means that it could be any day in the month, and it's the way the database accepts dates unless you have a specific publication date and Federal Register citation to report.

Because, according to Charisa, Greg has expressed the following publication expectation:

- Lion target publication date is 12/15/17
- Elephant and refuges target publication date is 1/15/17 [sic]

I inserted the 01/00/2018 publication projection for your proposed rule. If you negotiate a different date with the Director's Office for your proposal, please let me know, and I'll update it in the database.

Anissa

On Tue, Nov 7, 2017 at 7:32 AM, Cynthia Martinez  
<[cynthia\\_martinez@fws.gov](mailto:cynthia_martinez@fws.gov)> wrote:

Since I don't know what day 00 is and we have been informed that no packages will be moving between December 15th and January 4th, We should push the Refuge one out to March 30, 2018.

Cynthia

On Nov 6, 2017, at 4:21 PM, Craghead, Anissa  
<[anissa\\_craghead@fws.gov](mailto:anissa_craghead@fws.gov)> wrote:

In ROCIS, I changed the projected publication dates as follows:

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On Mon, Nov 6, 2017 at 3:57 PM, Morris, Charisa  
<[charisa\\_morris@fws.gov](mailto:charisa_morris@fws.gov)> wrote:

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Please let me know if you need to visit with him about these dates before they are shared.

Thanks,  
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**Megan, does Stu need to review these before Liz takes them out of future RIN status?**

*Please note:*

I received direct input from IA on BC94, but I didn't hear from Refuges or ES for the other two RIN assignments.

For all three proposed rules, I set the projected publication date at 02/00/2018, based on the (incomplete) information I have. These may be incorrect.

For all three proposed rules, I set the priority as "substantive, not significant," but this may be incorrect. I don't have definitive information for that field.

Agenda review reports are attached.

--

[Charisa Morris@fws.gov](mailto:Charisa_Morris@fws.gov) | Chief of Staff, Office of the Director | U.S. Fish & Wildlife Service | [1849 C Street NW, Room 3348](#) | Washington, DC 20240 | (202) 208-3843 | For urgent matters, please dial cell: 301-875-8937

--

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Kashyap Patel  
Management Analyst

Division of Policy, Performance, and Management Programs  
U.S. Fish and Wildlife Service  
Telephone: 703-358-1957  
Fax: 703-358-1997

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## **"Craghead, Anissa" <[anissa\\_craghead@fws.gov](mailto:anissa_craghead@fws.gov)>**

---

**From:** "Craghead, Anissa" <[anissa\\_craghead@fws.gov](mailto:anissa_craghead@fws.gov)>  
**Sent:** Tue Nov 14 2017 10:53:45 GMT-0700 (MST)  
**To:** "Patel, Kashyap" <[kashyap\\_patel@fws.gov](mailto:kashyap_patel@fws.gov)>  
**CC:** Michael Gale <[michael\\_gale@fws.gov](mailto:michael_gale@fws.gov)>, Susan Wilkinson <[susan\\_wilkinson@fws.gov](mailto:susan_wilkinson@fws.gov)>, Megan Apgar <[megan\\_apgar@ios.doi.gov](mailto:megan_apgar@ios.doi.gov)>, Jim Kurth <[jim\\_kurth@fws.gov](mailto:jim_kurth@fws.gov)>  
**Subject:** Re: New RIN assignments

All three are "active" RINs now and will be included in the Fall 2017 unified agenda (when it publishes; we don't know that date yet).

Anissa

On Tue, Nov 14, 2017 at 11:15 AM, Craghead, Anissa <[anissa\\_craghead@fws.gov](mailto:anissa_craghead@fws.gov)> wrote:  
I've contacted our liaison at GSA-RISC. I will let you know when I hear back from her.

On Tue, Nov 14, 2017 at 10:59 AM, Patel, Kashyap <[kashyap\\_patel@fws.gov](mailto:kashyap_patel@fws.gov)> wrote:  
Hi Anissa,

I talked to Jim. Go ahead and do whatever needs to be done so we can make the fall agenda. These dates seem to have the least consternation among everyone involved and they don't us from executing even faster than these targeted dates.

Please let us know if anything threatens our ability to publish in the fall agenda.

Thanks so much for looking out for us!  
Kashyap

On Tue, Nov 14, 2017 at 7:49 AM, Craghead, Anissa <[anissa\\_craghead@fws.gov](mailto:anissa_craghead@fws.gov)> wrote:  
Hi, Kashyap. Are the projected publication dates for RINs 1018-BC93, 1018-BC94, and 1018-BC95 settled? I ask because the longer it takes to settle on dates, the greater the chance that these RINs will not appear, or could appear with incorrect information, in the Fall unified agenda.

In ROCIS (the database that tracks RINs for OMB), these RINs are marked as "future RINs," that is, not publishing in the Fall agenda because we haven't settled

on projected publication dates. Being in "future RIN" status allows FWS to make updates to the RINs; as soon as we make them "active" RINs (that is, RINs that will appear in the next published agenda), we cannot make updates to them. We can ask GSA to make small changes to our active RINs on our behalf, but even that option is very quickly coming to a close. **I do not have a hard date for last changes.** As far as I know, and Megan Apgar (Exec Sec) may know more about this, OMB wants to publish the agenda in late November. As such, if we don't get the dates settled now, these RINs may not appear, or may appear with incorrect information, in the published agenda.

I need to know:

1. Are the following projected publication dates accurate?

1018-BC93 (Compatibility Regulations Pursuant to the National Wildlife Refuge System Improvement Act of 1997): **03/00/2018**

1018-BC94 (Revising the Endangered Species Act Section 4(d) Rule for the African Elephant): **01/00/2018** (note: this may be difficult to achieve due to the time required for the clearance process together with the upcoming holidays)

1018-BC95 (Revising the Endangered Species Act Section 4(d) Rule for the African Lion): **02/00/2018**

2. If the projected publication dates haven't been finalized, does the DO want to change the status of the RINs from "future" to "active" now anyway, so that the RINs will publish in the Fall 2017 unified agenda, even if the information that publishes ends up being inaccurate?

Megan or Sue, do you have anything to add?

Thanks,  
Anissa

On Mon, Nov 13, 2017 at 11:01 AM, Patel, Kashyap <[kashyap\\_patel@fws.gov](mailto:kashyap_patel@fws.gov)> wrote:  
Hi Anisa,

I think we're going to set up 15-30 minutes for Jim, Shaun and Gary to discuss new proposed dates, and the utility of maybe breaking down the dates Greg saw in terms of program time, DO time and FWP time in the process. If we do, it may be helpful to have you on the line. I'll let you know.

Thanks,  
Kashyap

On Mon, Nov 13, 2017 at 10:29 AM, Craghead, Anissa <[anissa\\_craghead@fws.gov](mailto:anissa_craghead@fws.gov)> wrote:

Thanks, Michael!

Kashyap, I'm working from home today (b)(6) if you want to talk. Otherwise, we can email.

Anissa

On Mon, Nov 13, 2017 at 10:25 AM, Michael Gale <[michael\\_gale@fws.gov](mailto:michael_gale@fws.gov)> wrote:  
+ Kashyap Patel

Kashyap is running point on this while he is acting as Deputy Chief of Staff this week.

Greg wanted to see if we could tighten these timelines, but the programs are not sure that is feasible. Kashyap has the specifics and can walk through them with you over the phone or email.

Michael

--

Michael Gale

Deputy Chief of Staff (Acting), Director's Office  
U.S. Fish and Wildlife Service

[202.208.4923](tel:202.208.4923) (office)

[571.982.2158](tel:571.982.2158) (cell)

On Nov 13, 2017, at 9:27 AM, Craghead, Anissa <[anissa\\_craghead@fws.gov](mailto:anissa_craghead@fws.gov)> wrote:

Hi, Michael.

I had no idea Charisa was going to be out. Can you please read this email string and let me know if a decision has been made regarding the projected publication dates of the three new RINs (BC93, BC94, and BC95)?

Thanks,  
Anissa

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Kashyap Patel  
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Fax: 703-358-1997

# Conversation Contents

Timing of RINS - seeking DO approval

**"Morris, Charisa" <charisa\_morris@fws.gov>**

---

**From:** "Morris, Charisa" <charisa\_morris@fws.gov>  
**Sent:** Thu Nov 09 2017 15:52:26 GMT-0700 (MST)  
**To:** Greg Sheehan <greg\_j\_sheehan@fws.gov>, Jim Kurth <jim\_kurth@fws.gov>, Stephen Guertin <stephen\_guertin@fws.gov>  
**CC:** Zachariah Gambill <zachariah\_gambill@fws.gov>, Michael Gale <michael\_gale@fws.gov>, Kashyap Patel <kashyap\_patel@fws.gov>  
**Subject:** Timing of RINS - seeking DO approval

Good afternoon-

At this point, I have the following to suggest to Greg as reasonable timelines, per the ADs:

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These timelines are based on staff work needed (revisions PLUS EAs if necessary) and surname deadlines. As a reminder, we need final dates to put into the system to fully process these RIN requests. Kashyap, please confirm DO-approved dates with Anissa Craighead.

Thanks!  
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**Greg Sheehan <greg\_j\_sheehan@fws.gov>**

---

**From:** Greg Sheehan <greg\_j\_sheehan@fws.gov>  
**Sent:** Sun Nov 12 2017 13:29:27 GMT-0700 (MST)  
**To:** "Morris, Charisa" <charisa\_morris@fws.gov>  
Jim Kurth <jim\_kurth@fws.gov>, Stephen Guertin <stephen\_guertin@fws.gov>, Zachariah Gambill

**CC:** <zachariah\_gambill@fws.gov>, Michael Gale  
<michael\_gale@fws.gov>, Kashyap Patel  
<kashyap\_patel@fws.gov>

**Subject:** Re: Timing of RINS - seeking DO approval

Thanks Charisa

I believe that even with the EA process (if needed) and surname process that we could accelerate these dates by several weeks each.

Please reprioritize these in the workload to identify what can be placed on temporary hold to move these more quickly.

Kashyap please email me achievable revised timelines and anticipated needs for EA work and what that would entail on each.

Thanks

Greg

Greg Sheehan  
Principal Deputy Director  
US Fish and Wildlife Service  
202-208-4545 office  
202-676-7675 cell

On Nov 9, 2017, at 5:53 PM, Morris, Charisa <[charisa\\_morris@fws.gov](mailto:charisa_morris@fws.gov)> wrote:

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**"Gale, Michael"** <[michael\\_gale@fws.gov](mailto:michael_gale@fws.gov)>

**From:** "Gale, Michael" <[michael\\_gale@fws.gov](mailto:michael_gale@fws.gov)>  
**Sent:** Mon Nov 13 2017 09:31:43 GMT-0700 (MST)

**To:** Gary Frazer <Gary\_Frazer@fws.gov>, Shaun Sanchez <shaun\_sanchez@fws.gov>, Cynthia Martinez <cynthia\_martinez@fws.gov>, Gina Shultz <Gina\_Shultz@fws.gov>, Gloria Bell <Gloria\_Bell@fws.gov>, Richard Ruggiero <richard\_ruggiero@fws.gov>  
**CC:** Kashyap Patel <kashyap\_patel@fws.gov>, Jim Kurth <jim\_kurth@fws.gov>, Stephen Guertin <stephen\_guertin@fws.gov>  
**Subject:** Fwd: Timing of RINS - seeking DO approval

Hello ES, Refuges, and IA,

Here is the email chain with Greg's request to adjust the timelines for the latest round of RINS.

Please let Kashyap Patel know of the revised timelines you're working on. We want to be able to provide Jim and Steve this information this week to give to Greg when he returns. It sounds like what makes sense is to have a bulleted timeline of when the product will be drafted, submitted to the Director's Office, and etc. through the process leading up to a targeted publication date.

Thanks,

Michael

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