

African Lion



**Department of Interior
U.S. Fish and Wildlife Service
Federal Fish and Wildlife Permit Application Form**

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

Type of Activity

**IMPORT OF SPORT-HUNTED TROPHIES OF SOUTHERN
AFRICAN LEOPARD AND NAMIBIAN SOUTHERN WHITE
RHINOCEROS**

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

Section A: Complete if applying as an individual

1.a. Last Name Bailey		1.b. First Name Michelle		1.c. Middle Name/Initial Dawn		1.d. Suffix	
2. Date of Birth (mm/dd/yyyy) (b) (6)		3. Telephone Number		3.a. Alternate Telephone Number		4. E-mail address	

Section B: Complete if applying on behalf of a business, corporation, public agency, Tribe, or institution

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

Section C: All applicants complete address information

1.a. Physical address (Street address; Apartment #, Suite #, or Room #; no P.O. Boxes) (b) (6)									
1.b. City Roswell		1.c. State New Mexico		1.d. Zip code/Postal code (b) (6)		1.e. County/Province		1.f. Country USA	
2.a. Mailing address (include if different than physical address; include name of contact person if applicable) Same--									
2.b. City		2.c. State		2.d. Zip code/Postal code		2.e. County/Province		2.f. Country	

Section D: All applicants MUST complete

1. Attach the nonrefundable application processing fee in the form of a check or money order payable to the U.S. FISH AND WILDLIFE SERVICE in the amount of \$100. Federal, Tribal, State, and local government agencies, and those acting on behalf of such agencies, are exempt from the processing fee – attach documentation of fee exempt status as outlined in instructions [50 CFR 13.11(d)].	
2. Certification: I hereby certify that I have read and am familiar with the regulations contained in Title 50 Part 13 of the Code of Federal Regulations and the other applicable parts in subchapter B of Chapter I of Title 50, and I certify that the information submitted in this application for a permit is complete and accurate to the best of my knowledge and belief. I understand that any false statement herein may subject me to the criminal penalties of 18 U.S.C. 1001.	
Signature of Applicant/Authorized Officer for permit (No photocopied or stamped signatures) Date of signature (mm/dd/yyyy) (b) (6) <i>attly in fact</i> 02/22/2019	
Please continue to next page	

E. IMPORT OF SPORT-HUNTED TROPHIES OF SOUTHERN AFRICAN LEOPARD AND NAMIBIAN SOUTHERN WHITE RHINOCEROS

Note 1: If you hold an import permit for trophy/trophies that you did not use, please **return the unused original permit to the address on page one.**

Note 2: If you are requesting reissuance of a permit because you have taken a trophy, but were unable to import it prior to the expiration of the permit, please use the renewal form (3-200-52) and return your original permit with that form.

Note 3: *Sport-hunted trophy* is defined at 50 CFR 23.74 as follows: *Sport-hunted trophy* means a whole dead animal or a readily recognizable part or derivative of an animal specifically identified on the accompanying CITES document that meets the following criteria:

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

Note 4: Certain hunting trophies, including leopard and rhinoceros hunting trophies, are subject to restrictions on their use after import into the United States. Please see 50 CFR 23.55 for more information or contact the Division of Management Authority.

- **Complete all questions on the application.**
- **Mark questions that are not applicable with "N/A".**
- **If applying for more than one trophy, be sure to answer questions 2 and 3 for each trophy.**
- **If importing trophies from more than one country, you must submit a separate application for each shipment in order to obtain separate import permits.**

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

Pro Cargo - attn: Cindi Rulon --- via enclosed FED EX
15619 Morales Rd.
Houston, Texas 77032

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

Cindi Rulon --- Pro Cargo - 281-220-3176 --- cindi.rulon@procargousa.com

3. Have you or your client (if a broker applying on behalf of your client), been assessed a civil penalty or convicted of any criminal provision of any statute or regulation relating to the activity for which the application is filed; been convicted, or entered a plea of guilty or nolo contendere, for a felony violation of the Lacey Act, the Migratory Bird Treaty Act, or the Bald and Golden Eagle Protection Act; forfeited collateral; OR are currently under charges for any violation of the laws mentioned above?

No Yes

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

4. ENTER the quantity next to the name of the species you are applying to import (you may apply to import specimens of more than one species provided they have been/are being hunted in the same country):
- a. Leopard (*Panthera pardus*) Quantity: 1 (Limited to the import of two per calendar year). If you wish to import a leopard taken in northern or western Africa, please use form 3-200-20.

- ~~b. Southern white rhinoceros (*Ceratotherium simum simum*) from Namibia
Quantity: (An import permit is not required for trophies harvested in South Africa or Swaziland. If you are looking to import from a different country, please use Form 3-200-20).~~

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

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

Upper Lupande, South Luangwa Region Zambia- GPS-S13 01 54.08S and 31 53 04.97E

- b. Date wildlife is to be hunted:

July- August 2019

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

Jason Stone of Stone Hunting Safaris

6. **IF THE ANIMAL HAS ALREADY BEEN TAKEN**, please enter the following:

- d. Country and place (area, region, GIS coordinates, ranch, conservancy, management area, or hunting block, AND nearest city) where wildlife is to be taken from the wild:
- e. Date wildlife was hunted:
- f. Name of hunting outfitter, safari company, or professional hunter you will be hunting with:
- g. The current location of the trophy (address and country) [the U.S. import permit will identify this country as the country of export/re-export and must match with the export/re-export document]:

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

NOT HUNTED YET

8. Complete name and address of overseas person or business shipping the trophy to you.

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

Name: Trophy Tracker Consult
 Business Name: P O Box 39131
 Address: Lusaka, 10101
 Address: Zambia
 City: Zambia
 State/Province:
 Country, Postal Code:

CERTIFICATION STATEMENT (original signature must be provided for either 9 or 10 below)

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

I acknowledge that the sport-hunted trophy/trophies to be imported has been/will be personally hunted by my client and is being imported only for my client's personal use (i.e., **not for sale, transfer, donation, or exchange that is reasonably likely to result in economic use, gain, or benefit**). If applying for the import of a leopard trophy, I understand that my client may only import two leopard trophies in one calendar year.

Taxidermist/Broker's signature

(b) (6)

attorney in fact Date: 02/22/2019

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

I acknowledge that the sport-hunted trophy/trophies to be imported has been/will be personally hunted by me and is being imported only for my personal use (i.e., **not for sale, transfer, donation, or exchange that is reasonably likely to result in economic use, gain, or benefit**). If applying to import a leopard trophy, I understand that I may only import two leopard trophies in one calendar year.

Applicant's signature: _____ **Date:** _____

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

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

Conservation Force
Operator Enhancement Questionnaire

v.5/8/18

1. Name of area operator: LUPANDE GMA
 - a. Years in business: THREE YEARS
 - b. Name of company conducting hunt: WESTGATE PROPERTIES LTD
2. Name of concession: UPPER LUPANDE GMA Size in km²: 1,226 KM2 (LUPANDE)
 - a. Land tenure: Government lease Community Private ranch Private conservancy
 - b. Length of concession agreement: SEVEN YEARS Can it be renewed? Yes No
 - c. Are there any special obligations under the concession agreement such as annual reporting, poaching control, community investment, community employment, etc.? If so, please explain:
YES WE ARE SUPPOSED TO PROVIDE A REPORT ON THE PLEDGES WE HAVE DONE TO THE COMMUNITY AND FUNDS THAT HAVE BEEN SPENT ON LAW ENFORCEMENT TO CURB POACHING IN THE AREA. THIS REPORT IS TAKEN INTO ACCOUNT AT THE TIME OF RENEWING THE CONCESSION IF WE WERE CONSISTENT DURING THE SEVEN YEARS TENURE
 - d. Please provide the concession location and nearest city. Please attach a map or maps with the boundaries marked and showing the nearest city: NEAREST TOWN IS MFUWE
 - e. If the concession borders a national park, please provide the park name: SOUTH LUANGWA NATIONAL PARK AND NSEFU NATIONAL PARK
 - f. Description of general and distinctive habitat features and any water features: HABITAT INCLUDES SAVANNA GRASSLANDS, MOPANE WOODLANDS, LAGOONS AND THE LUANGWA RIVER FLOWS THROUGH THE GMA
3. Are there any communities living in the concession? Yes No
 - a. If so, estimated number of people or villages in the concession? ABOUT 250 PEOPLE ONLY IN ONE VILLAGE IN THE GMA
4. Are there communities bordering this concession? Yes No
 - a. If so, estimated number of people or villages around the concession? THE POPULATION IS SPARSE AROUND THE GMA
5. Relevant game populations in the concession:¹

¹ The new FWS import permit application form asks the applicant: "9. a. Do you have any information regarding the population status or trend on the species hunted?"

**Conservation Force
Operator Enhancement Questionnaire**

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Species name	Relative Abundance (dense/avg./sparse)	Est. population	3-Year trend (up/ down/ stable)	How monitored?
Elephant	ABUNDANT	600 AND ABOVE	UPWARD	PATROL DATA AND OBSERVATIONS
Lion	FREQUENT		UPWARD	-TRAIL CAMERAS -OBSERVATIONS- -PATROL DATA
Leopard	FREQUENT		UPWARD	-TRAIL CAMERAS -OBSERVATIONS- -PATROL DATA
Prey species	ABUNDANT PREY BASE	ABUNDANT	UPWARD	-TRAIL CAMERAS -OBSERVATIONS- -PATROL DATA

6. Total employment number: **25 PERMANENT EMPLOYEES AND 50 CASUALS BEGINNING OF THE SEASON FOR CAMP BUILDING AND OPENING UP THE ROADS.**

a. Please identify the number and type of all employees:

Type	Total number of this type	Number of this type who are local/from nearby communities
Professional Hunters	FOUR	NONE
Trackers	FOUR	FOUR
Anti-poaching scouts/rangers	TWELVE	TWELVE
Other anti-poaching	THREE	THREE
Cooks/housekeepers	TEN	TEN
Community coordinators	ONE	ONE
Managers	ONE	NONE
Biologists	NONE	NONE
Others: <u>SKINNERS</u>	THREE	THREE

7. Number of staff employed in the off-season: **FIVE (5)**

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a. Please identify the number and type of staff that are engaged when the season is not open:

Type	Total number of this type	Number of locals/from nearby communities	When employed?
Anti-poaching staff	12	12	THROUGHOUT THE YEAR
Managers	1		
Maintenance	2		
Road opening/construction	30	25	BEGINNING OF THE SEASON
Community relations personnel	2	2	
Others: _____	NONE		

8. Anti-poaching efforts:²

- a. Number of anti-poaching staff: **TWELVE**
- b. Are anti-poaching patrols conducted during the hunting season, off-season, or both? **BOTH**
- c. Months during which anti-poaching patrols are conducted: **THROUGH OUT THE YEAR**
- d. Number of anti-poaching patrols per month: **WE DO THREE PATROLS (SETS OF 4 PEOPLE PER TEAM HEADED BY NATIONAL PARKS RANGERS.**
- e. Description of anti-poaching equipment, vehicles, etc.: **ONE 4X4 LANDCRUISER, BICYCLES, SATELLITE PHONES AND FIREARMS**
- f. Who is responsible for organizing and coordinating anti-poaching from prevention through successful prosecution? **WE DO TOGETHER WITH DEPARTMENT OF NATIONAL PARKS**
- g. Do you offer rewards to poaching informants leading to arrest? **X** Yes No
- h. Do you offer rewards to poaching informants upon conviction? **X** Yes No
- i. Please describe the company's anti-poaching expenditures below. What currency are the expenditures given in? **ZAMBIAN KWACHA**

Type of expense	Spending 2015	Spending 2016	Spending 2017	Remarks
Salaries for anti-poaching scouts	130 800	140,000	157,500	AMOUNT FOR 12 SCOUTS PER ANNUM
Equipment	30,000	43,000	50,000	UNIFORMS, BOOTS, TORCHES, RAINCOATS ETC
Vehicles	400,000		250,000	USED TO BUY A LANCRUISER IN THE FIRST YEAR FOR USE BY DNPWS

² The new FWS import permit application asks for activities that provide a "conservation benefit" to the species. The FWS considers anti-poaching a "conservation benefit."

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Operator Enhancement Questionnaire**

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Petrol	57,600	55,100	63,000	200 LITRES IS USED EVERY MONTH.THE CHANGE IN AMOUNTS IS DUE TO PRICE FLACTUATIONS
Rewards paid	12,000	8,000	28,500	REWARDS ARE IN FORM OF BICYCLES ,TELEVISION SETS AND KITCHEN UTENSILS
Other: _RANDOM PATROLS_____	15,000	17,000	25,000	RANDOM PATROLS USING OFFICERS FROM OTHER AREAS
Other: _____				
TOTALS	645,400	263,100	574,000	

9. Anti-poaching results:

Category	2015	2016	2017	Remarks
Poaching incidents discovered	185	127	103	THIS INCLUDED STATISTICS FROM DNPW AND GUN SHOTS HEARD
Ivory poachers arrested	12	5	2	THESE WERE TAKEN TO THE CHIEF
Meat poachers arrested	85	72	62	THESE WANTED MEAT FOR FOOD
Other poachers arrested	7	8	2	THESE POACHERS HAD NO SPECIFIC REASON FOR POACHING MAYBE FOR FUN
Poachers convicted	7	4	2	THESE GUYS THEIR CASES WERE TRIED AND DISPOSED OFF IN COURT
Snares/gin traps collected	478	352	275	THESE WERE FOUND DURING PATROLS ALL YEAR ROUND
Firearms confiscated	17	8	9	FIREARMS WERE GIVEN TO DNPWS
Vehicles confiscated	0	0	0	NO VEHICLES WERE CONFISCATED
Bicycles confiscated	19	8	3	A NUMBER OF THEM USE THESE AS MODE OF TRANSPORT
Boats/nets confiscated				
Tusks recovered	0	0	0	ITS HARD TO RECOVER TUSKS BECAUSE THEY CUT THEM INTO SMALLER PIECES IMMEDIATELY THEY ARE REMOVED FROM THE ELEPHANT

**Conservation Force
Operator Enhancement Questionnaire**

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Carcasses observed	22	15	9	THESE WERE DROPPED ON THE WAY AFTER THE POACHERS WERE PERSUED
Other: _____				

10. Community investment:³

- a. Does the company contribute money or goods/services to local communities? Yes No
- b. If so, what percentage or amount is shared, how often, and why (e.g., required by law, required by contract, voluntary contribution)? WE PAY 300,000 KWACHA AS COMMUNITY OBLIGATION AND 70,000 KWACHA FOR INFRASTRUCTURE DEVELOPMENT. THIS IS CONTAINED IN THE CONTRACT. BESIDES THE COMPANY MAKES ITS OWN VOLUTARY DONATIONS LIKE DONATING HAMMERMILLS, CLOTHES AND OFFERING HELP TO THE COMMUNITY WHEN NEED ARISES. WE HAVE BUILT PERMANENT STRUCTURES FOR CEREMONIES AND DUG BOREHOLES WHERE THERE IS NO CLEAN WATER.
- c. Does the company provide game meat to nearby communities? Yes No
- d. If so, please estimate the amount and/or value of meat contributed in prior year and describe THE MEAT CONTRIBUTION PROGRAM: 50% OF EDIBLE MEAT IS CONTRIBUTED TO THE COMMUNITY DURING THE HUNTING SEASON
- e. If the company performs problem animal activities for surrounding communities (e.g., patrolling fields during the harvest, chasing away problem animals, conducting PAC hunts or PAC killings), please describe. OUR MANAGER GOES AROUND THE VILLAGES TO ASK IF THE WILD ANIMALS HAVE CAUSED ANY DAMAGE TO THE CROPS
- f. Please describe any consolation payments made to local residents damaged by game species. What currency are the expenditures reported in? ZAMBIAN KWACHA

Species	Damage caused	Consolation paid 2015	Consolation paid 2016	Consolation paid 2017
Elephant	VEGETABLE FIELDS WERE EATEN	17,000	23,700	31,000
Lion	NIL			
Leopard	NIL			
Other	NIL			

- g. Please describe any community projects paid for by the company. What currency are the expenditures reported in? ZAMBIAN KWACHA

³ The new FWS import permit application asks for activities that provide a "conservation benefit" to the species. The FWS considers community investment a "conservation benefit."

**Conservation Force
Operator Enhancement Questionnaire**

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Type of project	Spending 2015	Spending 2016	Spending 2017	Remarks
Education (e.g., classrooms, offices)		60,000	90,000	Most of the schools in this Area are in a deplorable state. Westgate safaris has embarked on a program to renovate these schools so that children have better learning environment.
Education (e.g., school fees, supplies)				
Health (e.g., clinics, offices)				
Health (e.g., medical salaries, equipment)				
Community scout salaries	75,600	97,200	124,200	EMPLOY SCOUTS FROM COMMUNITY
Other community anti-poaching	20,000	25,000	30,000	ANTI POACHING AND ROAD BLOCKS FUNDED
Local government activities				
Water infrastructure improvements	40,000		40,000	DUG BOREHOLES
Sports teams funded	2,000	4,000	4,000	HELD AND HOSTED SOCCER TOURNAMENT
Construction materials donated	10,000	17,000	22,000	RUNNING WATER TOILETS
Other: _____				
Other: _____				
TOTALS	147,600	203,200	310,200	

11. How many U.S. clients did the company have in the past three years, and what percentage of the company's clients were from the U.S.?

	2015 (number and percentage of U.S. clients)	2016 (number and percentage of U.S. clients)	2017 (number and percentage of U.S. clients)
U.S. clients (total)	0	3(65%)	5 (70%)
-- hunting lion		0	1
-- hunting elephant		0	0
-- hunting leopard	0	3	3

12. Dollar amount and percentage of the company's revenue from U.S. clients: 60%

Conservation Force
Operator Enhancement Questionnaire

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13. Other information: Please provide a narrative of other enhancement information about the company, such as any special hunting policies (e.g., aging, size, resting areas), concession

-WE ONLY SHOOT LIONS OF 5 YEARS AND OVER

-WE ONLY SHOOT ELEPHANT OF 15 KGS WEIGHT OF IVORY AND OVER

-WE KEEP PATROL DATA FORMS AND MONITOR GAME POPULATIONS EVERY 2YEARS

Improvements (e.g., digging and maintaining boreholes, restocking), management activities, research, etc.

14. I declare that the foregoing is true and correct.

Signature: *[Handwritten Signature]*

Name: *Jedann M. Gita*

Title: DIRECTOR





John Rulon CHB

15619 Morales Rd. Houston, Texas 77032 281-220-3158

BELOW IS A POWER OF ATTORNEY FORM WHICH IS REQUIRED BY U.S. CUSTOMS, TO ALLOW US TO TRANSACT U.S. CUSTOMS CLEARANCE ON YOUR BEHALF.
U.S. Customs Services 141.32 C.R.

CUSTOMS POWER OF ATTORNEY

SS# (b) (6)
Cell Phone (b) (6)
Email address (b) (6)

Individual

KNOW ALL MEN BY THESE PRESENTS: That x Michelle Bailey (Full Name of Person), residing at x (b) (6) Roswell NM (b) (6) hereby constitutes and appoints each of the following persons - John Rulon CHB

may act through any of its offices or any employees with Power of Attorney on file with this licensed broker as required by the Regional Commission of Customs as a true and lawful agent and attorney of the grantor named above for and in the name, place, stead of said grantor from this date and in all Customs Districts, and in no other name, to make, endorse, sign, declare, or swear to any entry, withdrawal, declaration, certificate, bill of lading, or other document required by law or regulation in connection with the importation, transportation, or exportation of any merchandise shipped or consigned by or to said grantor; to perform any act or condition which may be required by law or regulation in connection with such merchandise; to receive any merchandise deliverable to said grantor: To make endorsements on bills of lading conferring authority to transfer title, make entry or collect drawback, and to make, sign, declare, or swear to any statement, supplemental statement, schedule, supplemental schedule, certificate of delivery, certificate of manufacture, certificate, and delivery abstract of manufacturing records, declaration of proprietor on drawback entry, declaration of exporter on drawback entry, or any other affidavit or document which may be required by law or regulation for drawback purposes, regardless of whether such bill of lading, sworn statement, schedule, certificate, abstract, declaration, or other affidavit or document is intended for filing in any customs district. To sign, seal, and deliver for and as the act of said grantor any bond required by law or regulation in connection with the entry or withdrawal of imported merchandise or merchandise exported with or without benefit of drawback, or in connection with the entry, clearance, lading, unloading or navigation of any vessel or other means of conveyance owned or operated by said grantor, and any and all bonds which may be voluntarily given and accepted under applicable laws and regulations, consignee's and owners declarations provided for in section 485, Tariff Act of 1930, as amended, or affidavits in connection with the entry of merchandise: To sign and swear to any document, and to perform any act that may be necessary or required by law or regulation in connection with the entering, clearing, lading, unloading, or operation of any vessel or other means of conveyance owned or operated said grantor. To authorize other Customs Brokers to act as grantor's agent; to receive, endorse and collect checks issued for Customs duty refunds in grantors name drawn on the Treasurer of the United States; if the grantor is a nonresident of the United States, to accept service of process on behalf of the grantor. And generally to transact at the customhouses in said district any and all customs business, including making, signing, and filing of protests under section 514 of the Tariff Act of 1930. In which said grantor is or may or may be concerned or interested and which may properly be transacted or performed by an agent and attorney, giving to said agent attorney full power and authority to do anything whatever requisite and necessary to be done in the premises as fully as said grantor could do if present and acting, hereby ratifying and confirming all that the said agent and attorney shall lawfully do by virtue of these presents; the forgoing power of attorney to remain in full force and effect until notice of revocation in writing is duly given to and received by the District Director of customs of the district aforesaid. If the donor of this power of attorney is a partnership, the said power shall in no case have any force or effect after the expiration of 2 years from the date of its execution. Or until revoked. Pursuant to 19 CFR 111.36(a), election is made waiving the right to receive invoices, supporting documents and correspondences from John Rulon CHB, who is directed to forward all documents and inquiries concerning our imports to their customs brokerage services, to our freight forwarder, who will pay John Rulon CHB, for duties, and services performed on our behalf. It is understood the right to revoke said waiver is continuing.

Customs Rules on Discharge of Importers Liability for Duties

The U.S. Customs Service has issued a final amendment of the regulations to provide an alternative procedure for an Importer record to pay duties on imported merchandise through a licensed customhouse broker. Present rules provide for the payment of duties to Customs by a broker on behalf of the importer. Under the alternative procedure, the Importer may elect to submit to the broker a separate check or bank draft for the duties payable to the "U.S. Customs Service". The broker would then deliver the Importer's check or bank draft to Customs. The new rule also requires brokers to provide written notification to their clients, advising that if the client is an Importer of record, payment to the broker will not relieve the client of liability for Customs charges in the event that the charges are not paid by the broker. Brokers will be required to provide this notification to all active clients annually during the month of February. Additionally, brokers will be required to provide such information on a power of attorney executed on or after the effective date of the new rule. These amendments are effective as of September 27, 1982

(Print name) x Michelle Bailey
has caused these presents to be sealed and signed:

(Signature) x (b) (6)

((Date) x 2-11-19

U.S. Fish and Wildlife Service
Division of Scientific Authority
Convention on International Trade in Endangered Species of Wild Fauna and Flora
(CITES)
Record of Advice on Import Permit Application

Application Number: 30487D

Date Received by DSA: March 15, 2019

DMA Contact: Stephanie Whitley

Applicant: Michelle Bailey
Roswell, New Mexico

Specimens and Species: Leopard (*Panthera pardus*)

Wild (Zambia)

One (1) personal sport-hunted trophy
(life-sized mount; skin, skull, and claws)

Recipient: Self

Type of Permit: Appendix I Import (CITES)

ADVICE

After reviewing the above permit application, we find that the proposed import is likely to be for purposes that are not detrimental to the survival of the species.

Species Background:

The leopard (*Panthera pardus*) has one of the largest geographic ranges of any terrestrial mammal in the world and ranges from southern Africa, through the Middle East, to eastern Asia from South Africa to eastern China and Russian Federation (Stein et al. 2016). The African leopard (*P. p. pardus*) is one of about nine leopard subspecies and occurs primarily in sub-Saharan regions (Jacobson et al. 2016). A habitat generalist, the leopard – all subspecies considered – occupies mesic woodlands, grassland savannas, and forests (Hunt 2011). Trees are an essential habitat component. Leopards are solitary, nocturnal, and territorial (Hunt 2011). Home ranges are about 13–35 km² (Hunt 2011). Ambush predators, leopards prey primarily on

medium-sized ungulates, especially deer (Family Cervidae) (Hanssen et al. 2017). They also scavenge prey taken by other carnivores. These carcasses are often cached in trees beyond the reach of smaller, more numerous predators (Stein et al. 2016). Adult leopards have few natural predators (Hunt 2011). The total population size of the leopard is unknown. In southern Africa, a regional range loss of approximately 21% has been reported (Stein et al. 2016). Given their larger body size, males are more desirable and thus more susceptible than females to being harvested by trophy hunters (Braczkowski et al. 2015). In general, the current population trend is declining due to harvest and habitat loss and fragmentation (Stein et al. 2016).

In 1975, the leopard as *Panthera pardus* was included in CITES Appendix I (UNEP 2018). In accordance with Resolution Conf. 10.14 (Rev. CoP16) on *Quotas for leopard hunting trophies and skins for personal use*, there are numerical limits to the quantity of trophies and skins from some sub-Saharan countries that have been approved by the CITES Parties that can be traded annually (CITES 2013).

In 1970, the leopard as *Panthera pardus* with (three subspecies) was listed as Endangered on the *United States' List of Endangered Foreign Fish and Wildlife*, the precursor to the Endangered Species Act of 1973, as amended (Service 1970). This listing was revised in 1972 with the three subspecies being deleted as separate listings and all leopard subspecies included with the species listing (*Panthera pardus*; Service 1972). This listing was modified in 1982 when certain populations were classified as Threatened (Service 1982; "In Africa, in the wild, south of, and including, the following countries: Gabon, Congo, Zaire, Uganda, Kenya"). The leopard currently is subject to a 90-day status review (Service 2016, 2017, 2018).

In 2016, the African leopard as *Panthera pardus* ssp. *pardus* was categorized as Vulnerable A2cd (ver 3.1) by the IUCN Red List (Stein et al. 2016). This rangewide finding was based on loss of habitat and prey, and exploitation. These conservation threats are not well understood, have not ceased, and are likely to continue (Stein et al. 2016).

The leopard is part of a joint initiative by the Convention on Migratory Species (CMS) and CITES: Joint CMS-CITES African Carnivores Initiative (CMS 2017a,b). Recognizing the potential benefits of working together, the two organizations have agreed to conduct joint activities addressing shared species and issues of common interest. In this regard, the two organizations have prioritized actions on the leopard, as well as the African lion (*Panthera leo*), cheetah, (*Acinonyx jubatus*), and wild dog (*Lycaon pictus*). The conservation threats to be addressed include: habitat loss and fragmentation, conflict with humans, depletion of the prey base, and unsustainable or illegal trade practices. Specific joint actions are being developed and will be implemented over the next several years (CMS 2017a). These actions include cooperative conservation programs for carnivores in the several range States, as well as specific conservation activities (e.g., illegal trade analyses, biological monitoring, and capacity building).

According to Zambia's Department of National Parks and Wildlife (DNPW), there are two main leopard populations in Zambia which are centered in the Kafue and Luangwa Ecosystems and are comprised of several national parks (NP) and game management areas (GMA) (CITES 2018a:3). Five smaller populations occur in northwest Zambia in the Lunga NP area, Liuwa NP area in the west, Sioma-Ngwezi NP area in the southwest, and in the NPs and GMAs in the

Bangweulu area and Lake Mweru-Wantipa area in the north (CITES 2018a:3). DNPW reports that the current total leopard range in Zambia is at least 220,000 km² (CITES 2018a:3), which is similar to the extant range of 218,000 km² determined by Jacobson et al. (2016:Supp. Table 5).

No countrywide estimate of the leopard population in Zambia has been made (CITES 2018a:5). Previous research conducted in 2011, 2016 and 2017, on leopard densities in some NPs and GMAs within Zambia found densities between 1.88 leopards/100 km² and 8.2 leopards/100 km² (CITES 2018a:5). Therefore, given the extent of leopard range in the country and assuming a conservatively low overall density of between one and two leopards per 100 km², DNPW reports that the overall leopard population in Zambia is likely to be 2,000 – 4,000 individuals (CITES 2018a:5).

In the 2016 IUCN Red List assessment, Stein et al. (2016) stated that it is generally thought that the Zambia leopard population is healthy but declining outside of human dominated areas. The leopard population in Zambia appears to be decreasing from previous estimates with leopards disappearing from areas with increased human development and intensive conflict with humans (Haton et al. 2001, du Toit 2004, Fusari et al. 2006, Lindsay et al. 2014, as cited in Stein et al. 2016.)

According to DNPW, threats to the persistence of the leopard population in Zambia include habitat encroachment and fragmentation, bush meat poaching/snaring, human leopard conflict and prey depletion (CITES 2018a:36). In addition, illegal harvest is a potential threat to the species in Zambia as DNPW confiscated 110 illegal leopard skins between 2013 and 2017 (CITES 2018a:12).

BASIS FOR ADVICE

A. Applicant Information:

1. The applicant (Michelle Bailey; Roswell, New Mexico) requests authorization to import one leopard (*Panthera pardus pardus*) personal, sport-hunted trophy from Zambia.
2. The purpose of the proposed import is personal use. The leopard will be taken from the wild in Lupande Upper Game Management Area, Zambia, during a hunt scheduled for July – August 2019. The 2019 leopard hunting quota allocated for Lupande Upper GMA has not yet been posted.

B. Zambia Information:

3. Leopards in Zambia are managed under a sustainable use program that includes trophy hunting and are the beneficiary of several protective measures. The Wildlife Act of 2015 (Act) is the principal legislation guiding the management of wildlife in Zambia, and the DNPW is the only government department responsible for the management of wildlife, including leopards, in Zambia (CITES 2018a:7). The Act also provides for the promotion of opportunities for the equitable and sustainable use of public wildlife estates; provides for the establishment, control

and co-management of Community Partnership Parks for the conservation and restoration of ecological structures for non-consumptive forms of recreation and environmental education; provides for the sustainable use of wildlife and the effective management of the wildlife habitat in Game Management Areas; enhances the benefits of Game Management Areas to local communities and wildlife; involves local communities in the management of Game Management Areas; and provides for the development and implementation of management plans (CITES 2018a:7).

The Act also provides for stiffer penalties related to poaching and enforcing all wildlife related violations in Zambia (CITES 2018a:7). Hunting of all wild animals without a permit in Zambia is illegal (CITES 2018a:7). Further, it is a criminal offense to hunt, kill, capture or be in possession of a leopard specimen without a license (CITES 2018a:7). The leopard is considered a protected species under the Act and therefore attracts stiffer penalties without option of a fine (CITES 2018a:7). Other legislation includes regulations (Private Wildlife Estates) and Statutory Instruments already in force such as CITES, Hunting, and Elephant Hunting (CITES 2018a:7). According to DNPW, other Statutory Instruments are in preparation for the implementation of the Wildlife Act of 2015 and are currently under review, including (CITES 2018a:1,7-8):

- formulating specific regulations which place certain conditions on the hunting of leopards (and lions) in GMAs, including but not limited to: age-based regulations, banning the hunting of females, and setting a minimum number of days to hunt; and
- formulating regulations regarding off-take quota management that will regulate how quotas are set, approved and utilized, and will be based on the precautionary principle that requires the most up-to-date information be used on setting quotas.

4. Leopard hunting in Zambia is carried out in hunting blocks located in Game Management Areas surrounding National Parks in the Luangwa, Kafue and Lower Zambezi ecosystem and in Open Game Ranches/Conservancies (CITES 2018a:16). Game Management Areas (GMA) are a category of protected areas in Zambia designed to form buffer zones between National Parks and Open Areas (CITES 2018a:16). The main land use form in GMAs has been safari and resident hunting; however, a few GMAs have included photographic tourism (CITES 2018a:16). There are 36 Game Management Areas in Zambia covering 177,404 km². Open Game Ranches are unfenced private wildlife estates outside public protected areas that are reserved by a person or local community for wildlife conservation and management (CITES 2018a:16). The private sector and the community agree to protect wildlife on these privately owned or communal lands and in exchange for protecting the wildlife, DNPW issues the Open Game Ranches annual non-resident hunting quotas (CITES 2018a:16). Zambia currently has 17 registered Open Game Ranches covering over 2,500 km², of which 8 have a quota for leopards (CITES 2018a:16-17).

5. Quotas are set annually and are issued to hunting blocks in GMAs and Open Game Ranches (CITES 2018a:18). With quotas allocated on an annual basis, DNPW can react quickly to any difficulties in specific areas, whenever necessary to adjust or even suspend quotas (CITES 2018a:52).

6. Zambia has a participatory quota setting process that is based on scientific information derived from aerial surveys, ground counts, patrol sightings, local and expert opinion, and hunting monitoring, as well as information provided by Community Resource Boards (CRBs),

DNPW, lease holders/operators/professional hunters, and other organizations (CITES 2018a:18). The quota for leopards is set using information from hunting records and field observations derived from professional hunters, operators, and field officers (CITES 2018a:18). According to DNPW, this allows CRBs and DNPW to review the previous hunting season's offtake before setting the quota for the upcoming year (CITES 2018a:18). In approving the quota, management developed the sustainable maximum harvest rates which it uses to allocate and approve the leopard quota as follows (CITES 2018a:18):

- Prime hunting blocks = 3 leopard per 1,000 km²
- Secondary hunting blocks and open game ranches = 1 leopard per 1,000 km²
- Under stocked hunting blocks = 0 leopard per 1,000 km²

DNPW states that in using these rates, the total number of leopards on quota that can possibly be issued in the entire country in any hunting season is 162 (CITES 2018a:18), which is 54 percent of the CITES approved export quota for Zambian leopard trophies and skins.

7. The Zambian government suspended leopard trophy hunting from 2013 to 2015 due to concerns and uncertainty about the conservation status of the population (Stein et al. 2016). According to DNPW, the suspension was lifted in 2016 when rural communities requested that the suspension be lifted due to the detrimental impact on their livelihoods of increased human-livestock-carnivore conflict with offsets from hunting revenues (CITES 2018a:1). In view of this, Zambia established a limited offtake that was within the CITES approved quota and that they believed was sustainable (CITES 2018a:1).

8. In reopening leopard hunting in 2016, DNPW consulted with independent leopard experts to get advice and held a workshop with stakeholders in April 2016, which resulted in the formulation of guidelines on leopard (and lion) hunting in Zambia (CITES 2018a:23). According to DNPW, the guidelines have since been re-drafted for gazetting as a Statutory Instrument and are considered as part of an adaptive process to manage leopard hunting in the country (CITES 2018a:23). In addition, DNPW states that the guidelines will be further reviewed at the end of the 2018 hunting season taking into account the experiences from the first two years of implementation since the suspension was lifted (CITES 2018a:23). The guidelines include (CITES 2018a:23):

1. Utilization must be based on scientific principles: use area size and leopard density, population status trends and prey availability;
2. Hunted leopards must be an adult; and
3. Use adaptive approaches in managing leopards. This may include varying quotas according to population status in a hunting area. Therefore, it is important to establish a monitoring mechanism that provides information on:
 - A. Indicators that show the leopard trends in an area, such as:
 - Hunting effort - time spent to find the desirable trophy;
 - Hunting success – was the hunted leopard of desired and acceptable trophy size;
 - Trophy size - Size of skull, tooth measurements, body length, shoulder height, etc.; and
 - Age – the average age of lawful trophies.
 - B. The status of habitat and prey in an area, including:
 - Satellite images of the area;

- Encroachment levels; and
 - Quantitative and qualitative indication of prey.
- C. Regular collection of data on the hunted leopard with prompt checking on the accuracy of information provided, with:
- Skull, teeth, and hide to be examined, sampled and permanently tagged; and
 - Certificates provided for proof of sampling and rating of trophy.

The guidelines also recommend (CITES 2018a:23-24): no hunting of female leopards, no hunting of any leopard born or held in captivity, no use of pre-recorded sounds in the hunting of leopards, no leopard hunting on fenced game ranches, leopard hunting only in Prime and Secondary areas and Open Game Ranches known to be rich in leopards and prey, and establishing a central place for trophy measurements and ageing of hunted leopards for export. According to DNPW, the long-term implementation and monitoring of the effectiveness of these guidelines and indicators allow for adaptive adjustment of leopard quotas (CITES 2018a:24).

9. As a result, Zambia’s new management approach to leopard hunting is based on three pillars (CITES 2018a:24):

- I. A conservative, precautionary quota, well below the recommended thresholds for sustainability;
- II. An age-based harvest limit and strong monitoring of leopard offtakes; and
- III. Significant and direct community benefits. This will ensure that leopard hunting in Zambia is sustainable and does not negatively affect the population. In addition, in the hunting concession agreements signed in 2015, no hunting outfitter has been guaranteed a leopard on quota. It is made clear that the quota for any species shall be based on scientific methods including the latest available survey and aging techniques.

10. To monitor quotas and trophy hunting in Zambia, wildlife officers accompany hunters on all hunts during the hunting season (CITES 2018a:28). The officer records activities related to the hunt on specified forms (i.e., Safari Hunting monitoring forms, trophy measurement forms, and a client questionnaire) (CITES 2018a:28). The officer endorses used licenses ensuring that they cannot be used again (CITES 2018a:28). In addition, the law requires that all harvested trophies be registered (CITES 2018a:28).

DNPW is also introducing a monitoring system specific for leopards (and lions). This monitoring system will be based on a Statutory Instrument which is in preparation, which will introduce a mandatory sampling system that requires trophy leopards meet or exceed a minimum size (or possibly age) as one measure for harvesting trophy leopards (CITES 2018a:29). The monitoring system will be based on specific forms that will help ensure proper compliance with the provisions of the law, including confirmation of legal licenses and collection of data associated with the hunt (including but not limited to: location, date, participants, and photos) (CITES 2018a:29). The monitoring system will be complemented by regular surveys for leopards throughout the GMAs using camera trap and other indirect monitoring techniques (CITES 2018a:29).

11. Leopard-human conflicts occur on the interface between communities and leopard range, often resulting in “problem animals” being removed through lethal means (CITES 2018a:35).

Fortunately, DNPW reports that the number of incidents of leopard–human conflict (HLC) is low in Zambia and retaliatory killings by livestock owners are not as prevalent as in other areas of Africa, however with increasing human populations, this may become an issue as human settlements expand (CITES 2018a:35,38). DNPW states that they apply an adaptive system that includes a procedure whereby reported cases of leopard damage are investigated by field officers and complete reports are reviewed by the most senior officer for immediate feedback (CITES 2018a:38). Interventions include: scaring leopards through blasting or killing the animals suspected to be responsible for the attack on livestock and humans (CITES 2018a:38). DNPW admits that this approach is considered incompatible with sustainable conservation of wildlife and may contribute to the decline in the leopard population; however, they state that they are committed to implement the best practices on HLC (for example, the HLC toolkit developed by the Niassa Carnivore Project) (CITES 2018a:38). According to DNPW, this will be done through the development of a specific policy on Human Wildlife Conflict that the department, pending the availability of funding, would like to devise as soon as possible (CITES 2018a:38).

12. According to DNPW, direct poaching of leopards is not believed to be significant (CITES 2018a:38). Between 2013 and 2017, DNPW confiscated 110 illegal leopard skins (CITES 2018a:12). As a result, DNPW is establishing an investigation into current levels of illegal trade and use of leopard skins (CITES 2018a:33). DNPW states that identifying levels and source routes will be a first step in controlling this potential threat to Zambia’s wild leopard population (CITES 2018a:33).

13. Given the elusive nature of leopards, the vast areas where they occur in Zambia and its wide-ranging biology, DNPW states that it is almost impossible to obtain reliable population estimates that can be used with confidence for management purposes (CITES 2018a:14). Moreover, DNPW states that the cost of undertaking long-term intensive surveys across the many habitats where leopards occur in Zambia is beyond the financial capacity of the DNPW (CITES 2018a:14). For these reasons, DNPW is adopting an adaptive management framework approach to determine reliable estimates of population trends to assess how leopard populations are changing over time and at a scale relevant to management (CITES 2018a:14). Going forward, DNPW will adopt “best practices” that use a combination of intensive monitoring (i.e. systematic camera trap surveys at 20 strategic sites across the country), extensive monitoring that captures relative abundance indices, and information captured from leopards that are harvested by the hunting industry (CITES 2018a:14). DNPW acknowledges that these relative abundance indices are generally less accurate and precise, but they can be collected rapidly at a landscape scale and within the capacity of the DNPW and its stakeholders (CITES 2018a:14). DNPW also recognizes that more reliable and robust monitoring techniques are required to better assess and measure the population trend and therefore, they state that they are committed to developing long-term rigorous monitoring programs that can be used to monitor the status of leopard populations across its range in Zambia (CITES 2018a:14).

14. The CITES Scientific Authority of Zambia has considered the country’s population of leopards, the quota-setting system and current precautionary quota, the newly implemented age-based harvest policy, the limited offtake, the adaptive management of leopards, and the current threats to leopards in Zambia, including loss of habitat, human-leopard conflicts, and levels of illegal trade (CITES 2018a:51). Upon considering these factors and in accordance with Article

IV of CITES and Resolution Conf. 16.7 (Rev. CoP17) on *Non-detriment findings*, the *Zambian Scientific Authority* concludes that the low level of offtake generated by trophy hunting is not detrimental to the survival of the leopard in Zambia (CITES 2018a:51). According to DNPW, the newly developed leopard management systems, Statutory Instruments and hunting reforms employ an adaptive management approach thereby ensuring long-term sustainability, health and enjoyment of Zambia's wild leopard populations (CITES 2018a:51).

C. CITES Export Quota Program

15. Within the context of CITES, Zambia initially had an approved export quota of 80 leopard skins established in 1983 at CoP4 (CITES 2018a:3). At CoP5 in 1985, Zambia proposed to increase its CITES export quota to 300 leopard trophies and skins per year in order to maintain and encourage sport hunting which had been a source of employment for local people (IUCN/SSC Cat Specialist Group 2017:94). The increase of the quota to 300 was adopted by the Conference of the Parties and has remained at that level ever since.

Although the approved CITES export quota has been 300 leopard trophies and skins per year, the annual leopard quotas established by Zambia and the actual hunting trophy exports have been less. Between 2005 and 2017, the DNPW issued a total of 1,177 leopards on quota of which 687 were utilized (58% of the annual quota) (CITES 2018a:23). During this period, the highest number of leopards issued on quota was 126 individuals in 2011 and the lowest was 37 individuals in 2015 (CITES 2018a:23). Before the hunting ban was implemented in 2013 – 2014, the average annual leopard quota was 120 individuals per year (CITES 2018a:23). Since the ban was lifted, the annual leopard quotas have increased from 37 individuals per year in 2015 to 105 individuals per year in 2017 (CITES 2018a:23). The annual leopard quota for 2018 was set at 102 individuals (CITES 2018a:20-21).

16. Since 2006, according to UNEP-WCMC (2018), reported gross exports have averaged 66 trophies annually and 4 skins annually.

17. Given that leopard export quotas are developed using various methods, the Parties at CoP17 adopted four interrelated decision on Quotas for leopard hunting trophies (see AC29 Doc. 16; CITES 2017a,b). According to Decision 17.114:

Parties, which have quotas, established under Resolution Conf. 10.14 (Rev. CoP16) on *Quotas for leopard hunting trophies and skins for personal use* are requested to review these quotas, and consider whether these quotas are still set at levels which are non-detrimental to the survival of the species in the wild, and to share the outcomes of the review and the basis for the determination that the quota is not detrimental, with the Animals Committee at its 30th meeting (July 2018).

18. The results of these reviews were considered by the Animals Committee at AC30 (CITES 2018b). During this time, a working group reviewed information submitted by leopard range states and made recommendations concerning quotas for 12 African countries to the Animals Committee. For Zambia:

“The WC recommends to the Animals Committee to inform the Standing

Committee that it considers that the quotas for Leopards for Zambia, as mentioned in Resolution Conf. 10.14 (Rev. CoP16), are set at levels which are non-detrimental to the survival of the species in the wild.”

The Animals Committee adopted this recommendation (CITES 2018c:6).

19. At the 70th meeting of the Standing Committee (SC70; Sochi, October 2018), the Chair of the Animals Committee submitted a document SC70 Doc. 55 on *Quotas for leopard hunting trophies (Panthera pardus): Report of the Animals Committee*. In the document, the Animals Committee informed the Standing Committee of the above recommendation. The Standing Committee noted the evaluation of the Animals Committee concerning the quotas for Zambia in Resolution Conf. 10.14 (Rev. CoP16) and invited the Secretariat to propose to the Conference of the Parties draft amendments to Resolution Conf. 9.21 (Rev. CoP13) on *Interpretation and application of quotas for species included in Appendix I* concerning approaches to review quotas for Appendix-I species, taking into consideration the recommendations of the Animals Committee in paragraph 5 f) of document SC70 Doc. 55 and opportunities to provide assistance to range States (CITES 2018d). These results will be taken up by the 18th meeting of the Conference of the Parties in Colombo, Sri Lanka, from May 23 – June 3, 2019, under document CoP18 Doc. 46 on *Quotas for Leopard Hunting Trophies*.

20. Therefore, based on the above information, we find that the current harvest levels are sustainable. As such, we advise that this import is likely to be for purposes that are not detrimental to the survival of the species.

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CONVENTION ON INTERNATIONAL TRADE IN ENDANGERED SPECIES OF WILD FAUNA AND FLORA

IMPORT PERMIT

1. Original Permit/Certificate No. 19US30487D/9
2. Valid 04/08/2020

3. Permittee (name and address, country)

MICHELLE DAWN BAILEY

(b) (6) ROSWELL, NM (b) U.S.A.

4. Consignor (name and address, country)

TROPHY TRACKER CONSULT P.O. BOX 39131 LUSAKA 10101 ZAMBIA

5. Special Conditions

ALL APPLICABLE FOREIGN, LOCAL, STATE, OR OTHER FEDERAL LAWS, INCLUDING THOSE REQUIRING PERMITS, MUST BE OBSERVED.

SPECIMEN MAY NOT BE SOLD OR TRANSFERRED FOR ANY FINANCIAL REMUNERATION.

U.S. THREATENED SPECIES [50 CFR 17.40(f)].

MUST IMPORT THROUGH A DESIGNATED PORT LISTED IN CONDITION 10. PERMITTEE MAY ONLY IMPORT TWO LEOPARD TROPHIES PER CALENDAR YEAR.

EACH LEOPARD SKIN MUST HAVE SELF-LOCKING TAG ATTACHED TO IT WHICH INDICATES THE STATE OF EXPORT, THE NUMBER OF THE SPECIMEN IN RELATION TO THE ANNUAL QUOTA, AND THE CALENDAR YEAR TO WHICH THE QUOTA APPLIES. THE EXPORT PERMIT (OR RE-EXPORT CERTIFICATE) MUST CONTAIN THE TAGGING INFORMATION AS OUTLINED ABOVE.

TROPHY MUST HAVE BEEN TAKEN DURING 2019 HUNTING SEASON.

-May not be used for commercial purposes. For live animals, only valid if the transport conditions comply with the CITES Guidelines for Transport of Live Animals or, in the case of air transport, with IATA Live Animals Regulations.

5a. Purpose of Transaction

H

6. U.S. Management Authority

Department of the Interior U.S. FISH AND WILDLIFE SERVICE DIVISION OF MANAGEMENT AUTHORITY BRANCH OF PERMITS, MS: IA 5275 LEESBURG PIKE FALLS CHURCH VA 22041-3803

U.S. CITES Management Authority

04/09/2019

Issuing Date

United States Management Authority

AUTHORITY: Endangered Species Act of 1973 (16 USC 1531 et. seq.)

7/8. Common Name and Scientific name (genus and species) of Animal or Plant

9. Description of Part or Derivative, including identifying marks or numbers (age/sex if live)

10. Appendix No. and Source

A. Common Name

LEOPARD

Scientific Name PANTHERA PARDUS

9. IMPORT IMPORT PERSONAL SPORT-HUNTED TROPHY (shipment may contain bones, claws, hide, skull, teeth, or any taxidermied part, as well as worked, manufactured, or handicraft items such as curios or jewelry, that must accompany raw or tanned parts.)

10. 1 W

11. Quantity (including units)

1 NO

12. Country of Origin ZAMBIA

B. Common Name

Scientific Name

9. [Redacted]

10. [Redacted]

11. Quantity (including units)

12. Country of Origin

C. Common Name

Scientific Name

9. [Redacted]

10. [Redacted]

11. Quantity (including units)

12. Country of Origin

D. Common Name

Scientific Name

9. [Redacted]

10. [Redacted]

11. Quantity (including units)

12. Country of Origin

E. Common Name

Scientific Name

9. [Redacted]

10. [Redacted]

11. Quantity (including units)

12. Country of Origin



Department of Interior
U.S. Fish and Wildlife Service
Federal Fish and Wildlife Permit Application Form

Type of Activity

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

IMPORT OF SPORT-HUNTED TROPHIES under Appendix I of the Convention on International Trade in Endangered Species (CITES) and/or U.S. Endangered Species Act (ESA)

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

Section A: Complete if applying as an individual

1.a. Last Name Bailey		1.b. First Name Brian		1.c. Middle Name/Initial	1.d. Suffix
2. Date of Birth (mm/dd/yyyy) (b) (6)		3. Telephone Number		3.a. Alternate Telephone Number ---	
				4. E-mail address cindi.rulon@procargousa.com	

Section B: Complete if applying on behalf of a business, corporation, public agency, Tribe, or institution

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

Section C: All applicants complete address information

1.a. Physical address (Street address; Apartment #, Suite #, or Room #; no P.O. Boxes) (b) (6)					
1.b. City Roswell	1.c. State New Mexico	1.d. Zip code/Postal code (b) (6)		1.e. County/Province	1.f. Country USA
2.a. Mailing address (include if different than physical address; include name of contact person if applicable) Same---					
2.b. City	2.c. State	2.d. Zip code/Postal code		2.e. County/Province	2.f. Country

Section D: All applicants MUST complete

1. Attach the nonrefundable application processing fee in the form of a check or money order payable to the U.S. FISH AND WILDLIFE SERVICE in the amount of \$100 . Federal, Tribal, State, and local government agencies, and those acting on behalf of such agencies, are exempt from the processing fee—attach documentation of fee exempt status as outlined in instructions [50 CFR 13.11(d)].
2. Certification: I hereby certify that I have read and am familiar with the regulations contained in Title 50 Part 13 of the Code of Federal Regulations and the other applicable parts in subchapter B of Chapter I of Title 50 , and I certify that the information submitted in this application for a permit is complete and accurate to the best of my knowledge and belief. I understand that any false statement herein may subject me to the criminal penalties of 18 U.S.C. 1001.
Signature of applicant/Principal Officer for permit (No photocopied or stamped signatures) Date of signature (mm/dd/yyyy) (b) (6) <i>atty in fact</i> 02/22/2019

Please continue to next page

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

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

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

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

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

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

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

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

Please provide the following information. Complete all questions on the application. Mark questions that are not applicable with "N/A". If needed, use a separate sheet of paper. On all attachments or separate sheets you are submitting; please indicate the application question number you are addressing. If applying for more than one trophy, be sure to answer questions 4-6 for each trophy addressed in this application. If importing trophies from more than one country, you must submit a separate application for each shipment in order to obtain separate import permits.

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

Pro Cargo- attn: Cindi Rulon -- enclosed FED EX envelope
15619 Morales Rd. Houston, Texas 77032

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

Cindi Rulon- 281-220-3176 -- cindi.rulon@procarbousa.com

3. Disqualification factor. A conviction, or entry of a plea of guilty or nolo contendere, for a felony violation of the Lacey Act, the Migratory Bird Treaty Act, or the Bald and Golden Eagle Protection Act disqualifies any such person from receiving or exercising the privileges of a permit, unless such disqualification has been expressly waived by the Service Director in response to a written petition. (50 CFR 13.21(c)) Have you or any of the owners of the business, if applying as a business, been convicted, or entered a plea of guilty or nolo contendere, forfeited collateral, or are currently under charges for any violations of the laws mentioned above?

No Yes

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

4. For each trophy to be imported, provide:

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

Lion-- Panthera Leo

b. Sex (if known). Male

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

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

Upper Lupande, South Luangwa, near Mfuwe, Zambia- GPS S13 01 54.08 S and 31 53 04.97 E

b. Date wildlife is to be hunted:

July-August 2019

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

Jason Stone of Stone Hunting Safaris

6. **IF THE TROPHY HAS ALREADY BEEN TAKEN**, please enter the following information:

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

b. Date wildlife was hunted:

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

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

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

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

Name:

Business Name: Trophy Trackers Consult.

Address: P O Box 39131

City: Lusaka, 10101

State/Province: Zamiba

Country, Postal Code:

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

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

Operator Enhancement Report attached.....

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

The 28 day Safari hunt will cost \$265,000. This includes 19 trophies and \$160,000. in Daily Fees and Government Fees -- see attached report to see that these funds are used for anti-poaching efforts, scouts, camp employees from the community.

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

See Attached Enhancement Report-----

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

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

I acknowledge that the sport-hunted trophy/trophies to be imported has been/will be personally hunted by my client and is being imported only for my client's personal use (i.e., not for sale, transfer, donation, or exchange that is reasonably likely to result in economic use, gain, or benefit). If applying for the import of an elephant trophy, I understand that my client may import no more than two elephant trophies in one calendar year.

Taxidermist/Broker's signature: (b) (6) *pretty in fact* Date: 02/22/2019

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

I acknowledge that the sport-hunted trophy/trophies to be imported has been/will be personally hunted by me and is being imported only for my personal use (i.e., not for sale, transfer, donation, or exchange that is reasonably likely to result in economic use, gain, or benefit). If applying to import an elephant trophy, I understand that I may import no more than two elephant trophies in one calendar year.

Applicant's signature: _____ Date: _____

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

- 12. All international shipments must be through a designated port. A list of designated ports (where an inspector is posted) is available from the list of designated ports. If you wish to use a port not listed, please contact the Office of Law Enforcement for a Designated Port Exemption Permit (form 3-200-2).

Conservation Force
Operator Enhancement Questionnaire

v.5/8/18

1. Name of area operator: LUPANDE GMA
 - a. Years in business: THREE YEARS
 - b. Name of company conducting hunt: WESTGATE PROPERTIES LTD
2. Name of concession: UPPER LUPANDE GMA Size in km²: 1,226 KM2 (LUPANDE)
 - a. Land tenure: Government lease Community Private ranch Private conservancy
 - b. Length of concession agreement: SEVEN YEARS Can it be renewed? Yes No
 - c. Are there any special obligations under the concession agreement such as annual reporting, poaching control, community investment, community employment, etc.? If so, please explain:
YES WE ARE SUPPOSED TO PROVIDE A REPORT ON THE PLEDGES WE HAVE DONE TO THE COMMUNITY AND FUNDS THAT HAVE BEEN SPENT ON LAW ENFORCEMENT TO CURB POACHING IN THE AREA. THIS REPORT IS TAKEN INTO ACCOUNT AT THE TIME OF RENEWING THE CONCESSION IF WE WERE CONSISTENT DURING THE SEVEN YEARS TENURE
 - d. Please provide the concession location and nearest city. Please attach a map or maps with the boundaries marked and showing the nearest city: NEAREST TOWN IS MFUWE
 - e. If the concession borders a national park, please provide the park name: SOUTH LUANGWA NATIONAL PARK AND NSEFU NATIONAL PARK
 - f. Description of general and distinctive habitat features and any water features: HABITAT INCLUDES SAVANNA GRASSLANDS, MOPANE WOODLANDS, LAGOONS AND THE LUANGWA RIVER FLOWS THROUGH THE GMA
3. Are there any communities living in the concession? Yes No
 - a. If so, estimated number of people or villages in the concession? ABOUT 250 PEOPLE ONLY IN ONE VILLAGE IN THE GMA
4. Are there communities bordering this concession? Yes No
 - a. If so, estimated number of people or villages around the concession? THE POPULATION IS SPARSE AROUND THE GMA
5. Relevant game populations in the concession:¹

¹ The new FWS import permit application form asks the applicant: "9. a. Do you have any information regarding the population status or trend on the species hunted?"

**Conservation Force
Operator Enhancement Questionnaire**

v.5/8/18

Species name	Relative Abundance (dense/avg./sparse)	Est. population	3-Year trend (up/ down/stable)	How monitored?
Elephant	ABUNDANT	600 AND ABOVE	UPWARD	PATROL DATA AND OBSERVATIONS
Lion	FREQUENT		UPWARD	-TRAIL CAMERAS -OBSERVATIONS- -PATROL DATA
Leopard	FREQUENT		UPWARD	-TRAIL CAMERAS -OBSERVATIONS- -PATROL DATA
Prey species	ABUNDANT PREY BASE	ABUNDANT	UPWARD	-TRAIL CAMERAS -OBSERVATIONS- -PATROL DATA

6. Total employment number: **25 PERMANENT EMPLOYEES AND 50 CASUALS BEGINNING OF THE SEASON FOR CAMP BUILDING AND OPENING UP THE ROADS.**

a. Please identify the number and type of all employees:

Type	Total number of this type	Number of this type who are local/from nearby communities
Professional Hunters	FOUR	NONE
Trackers	FOUR	FOUR
Anti-poaching scouts/rangers	TWELVE	TWELVE
Other anti-poaching	THREE	THREE
Cooks/housekeepers	TEN	TEN
Community coordinators	ONE	ONE
Managers	ONE	NONE
Biologists	NONE	NONE
Others: SKINNERS	THREE	THREE

7. Number of staff employed in the off-season: **FIVE (5)**

**Conservation Force
Operator Enhancement Questionnaire**

v.5/8/18

a. Please identify the number and type of staff that are engaged when the season is not open:

Type	Total number of this type	Number of locals/from nearby communities	When employed?
Anti-poaching staff	12	12	THROUGHOUT THE YEAR
Managers	1		
Maintenance	2		
Road opening/construction	30	25	BEGINNING OF THE SEASON
Community relations personnel	2	2	
Others: _____	NONE		

8. Anti-poaching efforts:²

- a. Number of anti-poaching staff: **TWELVE**
- b. Are anti-poaching patrols conducted during the hunting season, off-season, or both? **BOTH**
- c. Months during which anti-poaching patrols are conducted: **THROUGH OUT THE YEAR**
- d. Number of anti-poaching patrols per month: **WE DO THREE PATROLS (SETS OF 4 PEOPLE PER TEAM HEADED BY NATIONAL PARKS RANGERS.**
- e. Description of anti-poaching equipment, vehicles, etc.: **ONE 4X4 LANDCRUISER, BICYCLES, SATELLITE PHONES AND FIREARMS**
- f. Who is responsible for organizing and coordinating anti-poaching from prevention through successful prosecution? **WE DO TOGETHER WITH DEPARTMENT OF NATIONAL PARKS**
- g. Do you offer rewards to poaching informants leading to arrest? Yes No
- h. Do you offer rewards to poaching informants upon conviction? Yes No
- i. Please describe the company's anti-poaching expenditures below. What currency are the expenditures given in? **ZAMBIAN KWACHA**

Type of expense	Spending 2015	Spending 2016	Spending 2017	Remarks
Salaries for anti-poaching scouts	130 800	140,000	157,500	AMOUNT FOR 12 SCOUTS PER ANNUM
Equipment	30,000	43,000	50,000	UNIFORMS, BOOTS, TORCHES, RAINCOATS ETC
Vehicles	400,000		250,000	USED TO BUY A LANCRUISER IN THE FIRST YEAR FOR USE BY DNPWS

² The new FWS Import permit application asks for activities that provide a "conservation benefit" to the species. The FWS considers anti-poaching a "conservation benefit."

**Conservation Force
Operator Enhancement Questionnaire**

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Petrol	57,600	55,100	63,000	200 LITRES IS USED EVERY MONTH.THE CHANGE IN AMOUNTS IS DUE TO PRICE FLACTUATIONS
Rewards paid	12,000	8,000	28,500	REWARDS ARE IN FORM OF BICYCLES ,TELEVISION SETS AND KITCHEN UTENSILS
Other: _RANDOM PATROLS	15,000	17,000	25,000	RANDOM PATROLS USING OFFICERS FROM OTHER AREAS
Other:				
TOTALS	645,400	263,100	574,000	

9. Anti-poaching results:

Category	2015	2016	2017	Remarks
Poaching incidents discovered	185	127	103	THIS INCLUDED STATISTICS FROM DNPW AND GUN SHOTS HEARD
Ivory poachers arrested	12	5	2	THESE WERE TAKEN TO THE CHIEF
Meat poachers arrested	85	72	62	THESE WANTED MEAT FOR FOOD
Other poachers arrested	7	8	2	THESE POACHERS HAD NO SPECIFIC REASON FOR POACHING MAYBE FOR FUN
Poachers convicted	7	4	2	THESE GUYS THEIR CASES WERE TRIED AND DISPOSED OFF IN COURT
Snares/gin traps collected	478	352	275	THESE WERE FOUND DURING PATROLS ALL YEAR ROUND
Firearms confiscated	17	8	9	FIREARMS WERE GIVEN TO DNPWS
Vehicles confiscated	0	0	0	NO VEHICLES WERE CONFISTICATED
Bicycles confiscated	19	8	3	A NUMBER OF THEM USE THESE AS MODE OF TRANSPORT
Boats/nets confiscated				
Tusks recovered	0	0	0	ITS HARD TO RECOVER TUSKS BECAUSE THEY CUT THEM INTO SMALLER PIECES IMMEDIATELY THEY ARE REMOVED FROM THE ELEPHANT

**Conservation Force
Operator Enhancement Questionnaire**

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Carcasses observed	22	15	9	THESE WERE DROPPED ON THE WAY AFTER THE POACHERS WERE PERSUED
Other: _____				

10. Community investment:³

- a. Does the company contribute money or goods/services to local communities? Yes No
- b. If so, what percentage or amount is shared, how often, and why (e.g., required by law, required by contract, voluntary contribution)? **WE PAY 300,000 KWACHA AS COMMUNITY OBLIGATION AND 70,000 KWACHA FOR INFRASTRUCTURE DEVELOPMENT. THIS IS CONTAINED IN THE CONTRACT. BESIDES THE COMPANY MAKES ITS OWN VOLUNTARY DONATIONS LIKE DONATING HAMMERMILLS, CLOTHES AND OFFERING HELP TO THE COMMUNITY WHEN NEED ARISES. WE HAVE BUILT PERMANENT STRUCTURES FOR CEREMONIES AND DUG BOREHOLES WHERE THERE IS NO CLEAN WATER.**
- c. Does the company provide game meat to nearby communities? Yes No
- d. If so, please estimate the amount and/or value of meat contributed in prior year and describe **THE MEAT CONTRIBUTION PROGRAM: 50% OF EDIBLE MEAT IS CONTRIBUTED TO THE COMMUNITY DURING THE HUNTING SEASON**
- e. If the company performs problem animal activities for surrounding communities (e.g., patrolling fields during the harvest, chasing away problem animals, conducting PAC hunts or PAC killings), please describe. **OUR MANAGER GOES AROUND THE VILLAGES TO ASK IF THE WILD ANIMALS HAVE CAUSED ANY DAMAGE TO THE CROPS**
- f. Please describe any consolation payments made to local residents damaged by game species. What currency are the expenditures reported in? **ZAMBIAN KWACHA**

Species	Damage caused	Consolation paid 2015	Consolation paid 2016	Consolation paid 2017
Elephant	VEGETABLE FIELDS WERE EATEN	17,000	23,700	31,000
Lion	NIL			
Leopard	NIL			
Other	NIL			

- g. Please describe any community projects paid for by the company. What currency are the expenditures reported in? **ZAMBIAN KWACHA**

³ The new FWS import permit application asks for activities that provide a "conservation benefit" to the species. The FWS considers community investment a "conservation benefit."

**Conservation Force
Operator Enhancement Questionnaire**

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Type of project	Spending 2015	Spending 2016	Spending 2017	Remarks
Education (e.g., classrooms, offices)		60,000	90,000	Most of the schools in this Area are in a deplorable state. Westgate safaris has embarked on a program to renovate these schools so that children have better learning environment.
Education (e.g., school fees, supplies)				
Health (e.g., clinics, offices)				
Health (e.g., medical salaries, equipment)				
Community scout salaries	75,600	97,200	124,200	EMPLOY SCOUTS FROM COMMUNITY
Other community anti-poaching	20,000	25,000	30,000	ANTI POACHING AND ROAD BLOCKS FUNDED
Local government activities				
Water infrastructure improvements	40,000		40,000	DUG BOREHOLES
Sports teams funded	2,000	4,000	4,000	HELD AND HOSTED SOCCER TOURNAMENT
Construction materials donated	10,000	17,000	22,000	RUNNING WATER TOILETS
Other: _____				
Other: _____				
TOTALS	147,600	203,200	310,200	

11. How many U.S. clients did the company have in the past three years, and what percentage of the company's clients were from the U.S.?

	2015 (number and percentage of U.S. clients)	2016 (number and percentage of U.S. clients)	2017 (number and percentage of U.S. clients)
U.S. clients (total)	0	3(65%)	5 (70%)
-- hunting lion		0	1
-- hunting elephant		0	0
-- hunting leopard	0	3	3

12. Dollar amount and percentage of the company's revenue from U.S. clients: 60%

Conservation Force
Operator Enhancement Questionnaire

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13. Other information: Please provide a narrative of other enhancement information about the company, such as any special hunting policies (e.g., aging, size, resting areas), concession

-WE ONLY SHOOT LIONS OF 5 YEARS AND OVER

-WE ONLY SHOOT ELEPHANT OF 15 KGS WEIGHT OF IVORY AND OVER

-WE KEEP PATROL DATA FORMS AND MONITOR GAME POPULATIONS EVERY 2YEARS

Improvements (e.g., digging and maintaining boreholes, restocking), management activities, research, etc.

14. I declare that the foregoing is true and correct.

Signature: White

Name: Iskander M. Taha

Title: DIRECTOR

Taxidermist: BRUSH COUNTRY



John Rulon CHB

15619 Morales Rd. Houston, Texas 77032 281-220-3158

BELOW IS A POWER OF ATTORNEY FORM WHICH IS REQUIRED BY U.S. CUSTOMS, TO ALLOW US TO TRANSACT U.S. CUSTOMS CLEARANCE ON YOUR BEHALF.
U.S. Customs Services 141.32 C.R.

CUSTOMS POWER OF ATTORNEY

SS#

Cell Phone

Email address

(b) (6)
(b) (6)

Individual

KNOW ALL MEN BY THESE PRESENTS: That BRUSH COUNTRY (b) (6) (Full Name of Person), residing at x BAILEY ROSWELL NM (b) (6) hereby constitutes and appoints each of the following persons - John Rulon CHB

may act through any of its offices or any employees with Power of Attorney on file with this licensed broker as required by the Regional Commission of Customs as a true and lawful agent and attorney of the grantor named above for and in the name, place, stead of said grantor from this date and in all Customs Districts, and in no other name, to make, endorse, sign, declare, or swear to any entry, withdrawal, declaration, certificate, bill of lading, or other document required by law or regulation in connection with the importation, transportation, or exportation of any merchandise shipped or consigned by or to said grantor; to perform any act or condition which may be required by law or regulation in connection with such merchandise; to receive any merchandise deliverable to said grantor; To make endorsements on bills of lading conferring authority to transfer title, make entry or collect drawback, and to make, sign, declare, or swear to any statement, supplemental statement, schedule, supplemental schedule, certificate of delivery, certificate of manufacture, certificate, and delivery abstract of manufacturing records, declaration of proprietor on drawback entry, declaration of exporter on drawback entry, or any other affidavit or document which may be required by law or regulation for drawback purposes, regardless of whether such bill of lading, sworn statement, schedule, certificate, abstract, declaration, or other affidavit or document is intended for filing in any customs district. To sign, seal, and deliver for and as the act of said grantor any bond required by law or regulation in connection with the entry or withdrawal of imported merchandise or merchandise exported with or without benefit of drawback, or in connection with the entry, clearance, lading, unlading or navigation of any vessel or other means of conveyance owned or operated by said grantor, and any and all bonds which may be voluntarily given and accepted under applicable laws and regulations, consignee's and owners declarations provided for in section 485, Tariff Act of 1930, as amended, or affidavits in connection with the entry of merchandise; To sign and swear to any document, and to perform any act that may be necessary or required by law or regulation in connection with the entering, clearing, lading, unlading, or operation of any vessel or other means of conveyance owned or operated said grantor. To authorize other Customs Brokers to act as grantor's agent; to receive, endorse and collect checks issued for Customs duty refunds in grantors name drawn on the Treasurer of the United States; if the grantor is a nonresident of the United States, to accept service of process on behalf of the grantor. And generally to transact at the customhouses in said district any and all customs business, including making, signing, and filling of protests under section 514 of the Tariff Act of 1930. In which said grantor is or may or may be concerned or interested and which may properly be transacted or performed by an agent and attorney, giving to said agent attorney full power and authority to do anything whatever requisite and necessary to be done in the premises as fully as said grantor could do if present and acting, hereby ratifying and confirming all that the said agent and attorney shall lawfully do by virtue of these presents; the forgoing power of attorney to remain in full force and effect until notice of revocation in writing is duly given to and received by the District Director of customs of the district aforesaid. If the donor of this power of attorney is a partnership, the said the power shall in no case have any force or effect after the expiration of 2 years from the date of its execution. Or until revoked. Pursuant to 19 CFR 111.36(a), election is made waiving the right to receive invoices, supporting documents and correspondences from John Rulon CHB, who is directed to forward all documents and inquiries concerning our imports to their customs brokerage services, to our freight forwarder, who will pay John Rulon CHB, for duties, and services performed on our behalf. It is understood the right to revoke said waiver is continuing.

Customs Rules on Discharge of Importers Liability for Duties

The U.S. Customs Service has issued a final amendment of the regulations to provide an alternative procedure for an importer record to pay duties on imported merchandise through a licensed customhouse broker. Present rules provide for the payment of duties to Customs by a broker on behalf of the importer. Under the alternative procedure, the importer may elect to submit to the broker a separate check or bank draft for the duties payable to the "U.S. Customs Service". The broker would then deliver the importer's check or bank draft to Customs. The new rule also requires brokers to provide written notification to their clients, advising that if the client is an importer of record, payment to the broker will not relieve the client of liability for Customs charges in the event that the charges are not paid by the broker. Brokers will be required to provide this notification to all active clients annually during the month of February. Additionally, brokers will be required to provide such information (b) (6) of September 27, 1998 effective date of the new rule. These amendments are effective as

(Print name) x

has caused these presents to be sealed and signed:

(Signature) x

((Date) x

1-19-2019

BEN B. WALLACE

February 19, 2019

U.S. Fish and Wildlife Service
Division of Management Authority
Branch of Permits
5275 Leesburg Pike
Falls Church, VA 22041-3803

RCVD MAR 04 2019

To Whom It May Concern,

I am applying for a two CITES permits. One is to harvest and import a leopard and the other is to harvest and import an African lion, both from Tanzania to the United States. The hunt will take place from August 16 to September 6, 2019. Please note my enclosed applications for each.

Also enclosed, please find two checks, each for \$100, for the processing fee for each species.

Thank you for your consideration in advance.

Sincerely,

(b) (6)

Benjamin B. Wallace

(b) (6)

CORPUS CHRISTI, TX

(b) (6)

(b) (6)



RCVD MAR 04 2019 LB

**Department of Interior
U.S. Fish and Wildlife Service
Federal Fish and Wildlife Permit Application Form**

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

Type of Activity

IMPORT OF SPORT-HUNTED TROPHIES under Appendix I of the Convention on International Trade in Endangered Species (CITES) and/or U.S. Endangered Species Act (ESA)

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

Section A: Complete if applying as an individual

1.a. Last Name Wallace		1.b. First Name Benjamin		1.c. Middle Name/Initial Bird	1.d. Suffix
2. Date of Birth (mm/dd/yyyy) (b) (6)	3. Telephone Number	3.a. Alternate Telephone Number	4. E-mail address		

Section B: Complete if applying on behalf of a business, corporation, public agency, Tribe, or institution

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

Section C: All applicants complete address information

1.a. Physical address (Street address, Apartment #, Suite #, or Room #; no P.O. Boxes) (b) (6)				
1.b. City Corpus Christi	1.c. State Texas	1.d. Zip code/Postal code (b) (6)	1.e. County/Province	1.f. Country USA
2.a. Mailing address (include if different than physical address; include name of contact person if applicable)				
2.b. City	2.c. State	2.d. Zip code/Postal code	2.e. County/Province	2.f. Country

Section D: All applicants MUST complete

1. Attach the nonrefundable application processing fee in the form of a check or money order payable to the U.S. FISH AND WILDLIFE SERVICE in the amount of \$100. Federal, Tribal, State, and local government agencies, and those acting on behalf of such agencies, are exempt from the processing fee—attach documentation of fee exempt status as outlined in instructions [50 CFR 13.11(d)].	
2. Certification: I hereby certify that I have read and am familiar with the regulations contained in Title 50 Part 13 of the Code of Federal Regulations and the other applicable parts in subchapter B of Chapter I of Title 50, and I certify that the information submitted in this application for a permit is complete and accurate to the best of my knowledge and belief. I understand that any false statement herein may subject me to the criminal penalties of 18 U.S.C. 1001. (b) (6)	
Signature of applicant/Principal Officer for permit (No photocopied or stamped signatures)	Date of signature (mm/dd/yyyy) 12/20/2018

Please continue to next page

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

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

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

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

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

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

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

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

Please provide the following information. Complete all questions on the application. Mark questions that are not applicable with "N/A". If needed, use a separate sheet of paper. On all attachments or separate sheets you are submitting; please indicate the application question number you are addressing. If applying for more than one trophy, be sure to answer questions 4-6 for each trophy addressed in this application. If importing trophies from more than one country, you must submit a separate application for each shipment in order to obtain separate import permits.

1. Name and address where you wish the permit to be mailed, if different from page 1. If you would like expedited shipping, please enclose a self-addressed, pre-paid, computer-generated, courier service airway bill. If unspecified, all documents will be mailed via the U.S. Postal Service.
2. Who should we contact if we have questions about the application (name, phone number, and e-mail)?

Ben B Wallace (b) (6)

3. Disqualification factor. A conviction, or entry of a plea of guilty or nolo contendere, for a felony violation of the Lacey Act, the Migratory Bird Treaty Act, or the Bald and Golden Eagle Protection Act disqualifies any such person from receiving or exercising the privileges of a permit, unless such disqualification has been expressly waived by the Service Director in response to a written petition. (50 CFR 13.21(c)) Have you or any of the owners of the business, if applying as a business, been convicted, or entered a plea of guilty or nolo contendere, forfeited collateral, or are currently under charges for any violations of the laws mentioned above?

No Yes

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

4. For each trophy to be imported, provide:

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

Panthera leo, African Lion

b. Sex (if known). male

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

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

Tanzania - Rungwa Mpera Game Reserve, Manyoni District, Singida Region

b. Date wildlife is to be hunted:

August 16, 2019 to September 6, 2019

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

Rungwa Game Safaris, Ltd., P.O. Box 13946, Arusha, Tanzania

6. IF THE TROPHY HAS ALREADY BEEN TAKEN, please enter the following information:

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

b. Date wildlife was hunted:

- c. Name of hunting outfitter, safari company, or professional hunter you hunted with:
- d. The current location of the trophy (address and country) [the U.S. import permit will identify this country as the country of export/re-export and must match with the foreign export/re-export document]:
7. Please provide a copy of any applicable foreign government permits or licenses that were required to remove this animal from the wild (if you have not hunted yet and do not currently hold any such permits or licenses, please indicate so). I have not hunted yet and do not currently hold any such permits.
8. Complete name and address of overseas person or business shipping the trophy to you. If you are applying to import a trophy directly from **Namibia**, you must provide the name and address of the professional hunter listed on your Namibian hunting permit [this name will appear on the face of the export permit].
Name:
Business Name:
Address:
City:
State/Province:
Country, Postal Code:
9. For species listed under the U.S. Endangered Species Act, please be aware that the U.S. Fish and Wildlife Service (Service) must make a finding that your activities will enhance or benefit wild populations of the species involved. While we will communicate with the range country for the species you will hunt or hunted when making the required findings, if you have any information that could support this finding, it would be helpful for our review if you could provide it. Please submit such information on a separate page with your application.
- a. Do you have any information regarding the population status or trend data on the species hunted?
Please see the information provided on the attached document.
- b. In order to hunt, you likely paid for licenses or trophy fees. What were those fees and do you have any information on how those funds were used by either the landowner, local community, or government?
Please see the information provided on the attached document.
- c. Do you have information on other funding activities that are being carried out, or were carried out, by the safari outfitter, professional hunter, concession holder, or landowner that provide a conservation benefit to the species being hunted/species hunted?
Please see the information provided on the attached document.

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

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

I acknowledge that the sport-hunted trophy/trophies to be imported has been/will be personally hunted by my client and is being imported only for my client's personal use (i.e., not for sale, transfer, donation, or exchange that is reasonably likely to result in economic use, gain, or benefit). If applying for the import of an elephant trophy, I understand that my client may import no more than two elephant trophies in one calendar year.

Taxidermist/Broker's signature: _____ Date: _____

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

I acknowledge that the sport-hunted trophy/trophies to be imported has been/will be personally hunted by me and is being imported only for my personal use (i.e., not for sale, transfer, donation, or exchange that is reasonably likely to result in economic use, gain, or benefit). If applying to import an elephant trophy, I understand that I may import no more than two elephant trophies in one calendar year.

Applicant's signature: _____ Date: _____

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

12. All international shipments must be through a designated port. A list of designated ports (where an inspector is posted) is available from [the list of designated ports](#). If you wish to use a port not listed, please contact the Office of Law Enforcement for a Designated Port Exemption Permit (form 3-200-2).

ATTACHMENT TO
BENJAMIN BIRD WALLACE
FEDERAL FISH AND WILDLIFE PERMIT APPLICATION FORM
2019 LION

I realize that the U.S. Fish and Wildlife Service will evaluate each application in accordance with their permits issuance criteria at 50 CFR 17.32(a)(2). As described in the Endangered Species Act (ESA) special rule for threatened lions, you may consider factors such as those below [see 50 CFR 17.40(r)]. To the best of my ability, I have attempted to address each of them. The questions and answers below correspond to the ones on my application.

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

According to the Tanzanian Wildlife Management Authority, Tanzania holds the most important lion population in Africa and on Earth. Approximately 50 percent of Africa's lion population (total of 16,800 lions) resides in Tanzania, with 56.8 percent of the lions being in hunting areas alone. Like the United States places great value on the conservation and management of private lands to benefit a diversity of species, Tanzania relies on these hunting areas for the protection of lions and their habitat. The Tanzanian Wildlife Management Authority and its research arm, the Tanzanian Wildlife Research Institute, have an ongoing program to monitor lion habitat and populations. While the population trend of lions in Rungwa is unknown, the population in another lion hunting area, the Selous Game Reserve, is stable. In the past few years, the offtake of lions due to a reduction in lion trophy hunting has declined approximately 40 percent. Tanzania greatly values both consumptive and non-consumptive uses of lions; its economy and conservation programs are dependent on the sustainable offtake of this species.

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

The trophy fee for an African lion in Tanzania is \$16,500.00. Hunting is the major source of revenue for the Tanzanian Wildlife Management Authority. Fees generated from these hunts fund anti-poaching, habitat conservation, research, and conservation activities directly. Rungwa Game Safaris (RGS) works to reduce human-lion conflicts near its concession areas. RGS has programs established to assist village schools around the hunting areas with funding for projects to understand and respect native wildlife and how they are important to the community, both culturally and economically.

Again, RGS has donated medical supplies, televisions, and supplies to schools, assisted children who are malnourished by providing clean water to local villages through the use of its drilling rig, and has helped renovate wells to provide water versus increasing the risk of children to lions and crocodiles by removing water from local rivers. These efforts benefit the people living the villages surrounding RGS's concession areas.

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

The management program in Tanzania and on the concession is based on sound, scientific principles. Julius Kambarage Nyerere, the first president of Tanzania, said, as part of The Arusha Manifesto, "...The survival of our wildlife is a matter of grave concern to all of us in Africa...these wild creatures amid wild places they inhabit are not only important as a source of wonder and inspiration, but they're an integral part of our natural resources and our future livelihood and well being." As such, the Tanzanian Wildlife Management Authority strives to manage its wildlife in a scientific manner to improve the quality of life of its citizens. Furthermore, the management program at RGS is based on science and includes the taking of no more than one lion per 2000 square kilometers of concession area. The mission of RGS is "to conserve Tanzania's wildlife by effectively managing its precious resources so that our children and their children will be able to enjoy the natural heritage of Africa...wildlife."

The management program of RGS identifies mechanisms that would arrest the loss of habitat or increase available habitat (*i.e.*, by establishing protected areas and ensuring adequate protection from human encroachment). RGS recognizes the threat of human encroachment to the loss of habitat in Tanzania. RGS works with local people, including the employment of them, in villages and surrounding areas as they are an integral part of ensuring that wildlife and its habitat loss are curtailed or at least minimized by understanding the direct economic benefit from hunting and wildlife-associated tourism. RGS has its own anti-poaching program which works in conjunction with the Tanzanian Wildlife Management Authority. RGS provides its team vehicles, fuel, food, equipment, allowances, rewards, GPS devices, radios, and various other expenses associated with anti-poaching. This joint program works continuously to protect the wildlife and human resources in and around the concession areas. Furthermore, it protects part of its hunting areas by not allowing the take of game in certain areas. RGS also funds infrastructure projects around the concession areas to improve road and bridge conditions to further help with anti-poaching efforts. RGS also invests in innovative, programmatic and results oriented conservation programs for local citizens so they further understand the many values (*e.g.*, natural, cultural and economic) of wildlife and its habitat to Tanzania.

The management program of RGS actively addresses the loss of the lion's prey base by addressing poaching or unsustainable off take within Tanzania. The area of the lion

hunt will be the Rungwa Game Reserve. There are no people nor livestock living within the Reserve and is supported by the sustainable off-take of game at a minimum of a level as possible. Furthermore, RGS also invests conservation programs for local citizens so they further understand the importance of wildlife, including the lion and its prey base, as well as their habitat, to Tanzania. As a result of these combined activities, RGS has witnessed the annual improvement of wildlife populations and the quality of the hunting experience.

The Tanzanian Wildlife Management Authority has incentives in place that encourage habitat protection by private landowners and communities and incentives to local communities to reduce the incursion of livestock into protected areas or to actively manage livestock to reduce conflicts with lions. The part of the Rungwa Game Reserve that the lion will be hunted has neither people nor livestock in or adjacent to it. However, RGS and the Tanzanian Wildlife Management Authority have programs established to assist the nearest village schools with funding for projects to understand and respect native wildlife and how they are important to the community, both culturally and economically. RGS believes that in order to practice wildlife conservation, the welfare of the local people that live near the concessions must first be addressed. For example, RGS has donated medical supplies, televisions, supplies to schools, assisted children who are malnourished by providing clean water to local villages through the use of its own drilling rig, and has helped renovate wells to provide water versus increasing the risk of children to lions and crocodiles by removing water from local rivers. These efforts benefit the people living the villages surrounding RGS's concession areas, furthering the link between the conservation of wildlife and its habitat, and the people.

RGS's management program works to ensure the long-term survival of the lion, its prey base, and habitat. The off-take number and the constant patrolling through the joint RGS's and Tanzanian Wildlife Management Authority's anti-poaching program ensures the long-term survival of the lion, thus benefitting local communities and villages from the revenue generated from the sale of lion hunts. Furthermore, Rungwa works to reduce human-lion conflicts near its concession areas.

Finally, a U.S. hunter's participation in the hunting program contributes to the overall management of lions within Tanzania. Hunters from the United States play a major role in the overall management of lions in Tanzania, both from a source of revenue and from the harvest of older lions not in a pride. Furthermore, U.S. hunters and RGS help with funding other activities previously stated to benefit schools and improve health, purchase educational and sporting equipment, purchase building materials, and improve agricultural conditions in local communities and help to alleviate poverty around RGS's concessions. Through RGS's help through teaching and experience, children can see first-hand that the conservation of wildlife and the protection of habitat leads to the increase in tourism and a better quality of life for themselves and their village

THIS DOCUMENT HAS A COLORED BACKGROUND AND MICROPRINTING. THE REVERSE SIDE INCLUDES AN ARTIFICIAL WATERMARK.

BEN B. WALLACE

9 (b) 9
CORPUS CHRISTI, TX 78466-8469

9 (b) 9

AMERICAN BANK
CORPUS CHRISTI
CORPUS CHRISTI, TX 78466-8469
88-328-1149

2/20/2019

9 (b) 9

Pay to the
Order of

U. S. FISH AND WILDLIFE SERVICE

\$100.00

One Hundred and 00/100*****

*****DOLLARS

**U. S. FISH AND WILDLIFE SERVICE
4401 N. FAIRFAX DRIVE, ROOM 700
ARLINGTON, VA 22203**

(b) (6)

LION PERMIT

9 (b) 9



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

OMB No. 1018-0093
Expires 05/31/2017

Federal Fish and Wildlife Permit Application Form

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

Type of Activity:
Import of Sport-hunted Trophies of
Southern African Leopard, African Elephant, and
Namibian Southern White Rhinoceros

RCUD MAR 5 2019

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

Section A: Complete if applying as an individual. Fields include: 1.a. Last name (Shea), 1.b. First name (Christopher), 1.c. Middle name or initial (Michael), 1.d. Suffix, 2. Date of birth, 3. Social Security No., 4. Occupation, 5. Affiliation, 6.a. Telephone number, 6.b. Alternate telephone number, 6.c. Fax number, 6.d. E-mail address.

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

Section C: All applicants complete address information. Fields include: 1.a. Physical address (Street address; Apartment #, Suite #, or Room #; no P.O. Boxes), 1.b. City (Shelby Township), 1.c. State (MI), 1.d. Zip code/Postal code, 1.e. County/Province, 1.f. Country (USA), 2.a. Mailing Address, 2.b. City, 2.c. State, 2.d. Zip code/Postal code, 2.e. County/Province, 2.f. Country.

Section D: All applicants MUST complete. 1. Attach check or money order payable to the U.S. FISH AND WILDLIFE SERVICE in the amount of \$100, nonrefundable processing fee. 2. Do you currently have or have you ever had any Federal Fish and Wildlife permits? Yes [] If yes, list the number of the most current permit you have held or that you are applying to renew/re-issue: No [x]. 3. Certification: I hereby certify that I have read and am familiar with the regulations contained in Title 50, Part 13 of the Code of Federal Regulations and the other applicable parts in subchapter B of Chapter I of Title 50, and I certify that the information submitted in this application for a permit is complete and accurate to the best of my knowledge. Signature: [Redacted], Date of signature: 02/18/19.

Please continue to next page

E. IMPORT OF SPORT-HUNTED TROPHIES OF SOUTHERN AFRICAN LEOPARD, AFRICAN ELEPHANT, AND NAMIBIAN SOUTHERN WHITE RHINOCEROS

Note 1: If you hold an import permit for trophy/trophies that you did not use, please **return the unused original permit**. If you are requesting reissuance of a permit because you have taken a trophy, but were unable to import it prior to the expiration of the permit, please use the renewal form (3-200-52; <http://www.fws.gov/international/permits/by-form-number/index.html>) and return your original permit with that form.

Note 2: The U.S. FWS has determined that a trophy consists of raw or tanned parts of a specimen taken by a hunter during a sport hunt for personal use. It may include the bones, claws, hair, head, hide, hooves, horns, meat, skull, teeth, tusks, or any taxidermied part, including, but not limited to, a rug or taxidermied head, shoulder, or full mount. It does not include articles made from a trophy, such as worked, manufactured, or handicraft items for use as clothing, curios, ornamentation, jewelry, or other utilitarian items. If you wish to import such products, please contact the Division of Management Authority for the proper application form.

Note 3: Certain hunting trophies, including leopard, elephant, and rhinoceros hunting trophies, are subject to restrictions on their use after import into the United States. Please see 50 CFR 23.55 for more information or contact the Division of Management Authority.

Please provide the following information. Complete all questions on the application. Mark questions that are not applicable with "N/A". If applying for more than one trophy, be sure to answer questions 2 and 3 for each trophy. If importing trophies from more than one country, you must submit a separate application for each shipment in order to obtain separate import permits.

1. ENTER the quantity next to the name of the species you are applying to import (you may apply to import specimens of more than one species provided they have been/are being hunted in the same country):

Leopard (*Panthera pardus*) Quantity: ² _____ (Limited to the import of two per calendar year)

African elephant (*Loxodonta africana*) Quantity: _____ (Import permit is not required for trophies harvested in Botswana, Namibia, South Africa, or Zimbabwe). **Note: once imported, ivory cannot be re-exported.**

Southern white rhinoceros (*Ceratotherium simum simum*) from Namibia Quantity: _____ (An import permit is not required for trophies harvested in South Africa or Swaziland. If you are looking to import from a different country, please use form 3-200-37).

2. **IF ANIMAL IS CURRENTLY LIVING IN THE WILD**, please enter the following:
 - a. Country and place (area, region, GIS coordinates, ranch AND nearest city) where wildlife is to be taken from the wild:
 - b. Date wildlife is to be hunted:
 - c. Description of the trophy and parts you intend to import (e.g., skin, skull, shoulder mount, life size mount, claws, horns, tusks).
3. **IF THE ANIMAL IS DEAD**, please enter the following:
 - a. Country and place (area, region, GIS coordinates, ranch, and/or AND nearest city) where trophy was removed from the wild: Chewore Safari Area - North Mashonaland West
 - b. Date wildlife was hunted:
October 05, 2018 and October 8, 2018

- c. Description of the trophy and parts you intend to import (e.g., skin, skull, shoulder mount, life size mount, claws, horn, tusks):
- d. The current location of the trophy (address and country) [the U.S. import permit will identify this country as the country of export/re-export and must match with the export/re-export document]:

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

Name: Dee Gilmour
 Business Name: Trophy Consultants International (T.C.I.)
 Address: 4 Josiah Chinamano Road
 Address: Belmont
 City: Bulawayo
 State/Province: Zimbabwe
 Country, Postal Code:

5. Please be aware that the U.S. Fish and Wildlife Service may need to make a finding that your activities will enhance or benefit wild populations of the species involved. If you have any information that could support this finding (e.g., how the funds from license/trophy fees will be spent, what portion of the hunting fee will support conservation), please submit such information on a separate page with your application.

CERTIFICATION STATEMENT (original signature must be provided for either 6 or 7 below)

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

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

Taxidermist/Broker's signature: _____ **Date:** _____

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

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

Applicant's signature: (b) (6) _____ **Date:** 2/18/19

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

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

9. Name and address where you wish the permit to be mailed, **if** different from page 1 (All permits will be mailed via the U.S. Postal Service, unless you identify an alternative means below):

10. If you wish the permit to be delivered by means other than USPS regular mail, provide an air bill, pre-paid envelope, or billing information. If you do not have a pre-paid envelope or air bill and wish to pay for a courier service with your credit card, please check the box below. Please **DO NOT** include credit card number or other information; you will be contacted for this information.

If a permit is issued, please send it via a courier service to the address on page 1 or question 9. I understand that you will contact me for my credit card information once the application has been processed.

11. Who should we contact if we have questions about the application? (Include name, phone number, and email):

12. **Disqualification Factor.** A conviction, or entry of a plea of guilty or nolo contendere, for a felony violation of the Lacey Act, the Migratory Bird Treaty Act, or the Bald and Golden Eagle Protection Act disqualifies any such person from receiving or exercising the privileges of a permit, unless such disqualification has been expressly waived by the Service Director in response to a written petition. (50 CFR 13.21(c)) Have you or any of the owners of the business, if applying as a business, been convicted, or entered a plea of guilty or nolo contendere, forfeited collateral, or are currently under charges for any violations of the laws mentioned above?

Yes No If you answered "Yes" provide: a) the individual's name, b) date of charge, c) charge(s), d) location of incident, e) court, and f) action taken for each violation.

ZW 072/500
/2018-PAR

ZW 072/500
/2018-PAR

LEOPARD

TROPHY EXPORT TAG

ZW 072/500/2018-PAR



ZW 073/500
/2018-PAR

ZW 073/500
/2018-PAR

LEOPARD

TROPHY EXPORT TAG

ZW 073/500/2018-PAR



HUNTING RETURN FORM - TRAS2 APPLICATION FOR HUNTING NP/CITES

Issued in terms of Exchange Control Act (Chapter 22:05),
The Parks and Wild Life Act (Chapter 20:14) and the Tourism Act (Chapter 14:20)

0000081216
HUNT_FUNDS_CAPTURED

1. DETAILS OF THE SAFARI OPERATOR

Name of Operator	Big Five Safaris (Pvt) Ltd	Client's Full Name	CHRISTOPHER MICHAEL SHEA
ZTA (HOP) No.	HOP0143	Passport Number	(b) (6)
Address	Chewore North Safari Area, 54 Edinburg Rd, Vainona, Borrowdale - P O Box CY 1949, Harare bigfivesafaris@gmail.com	Country of Issue	UNITED STATES
Name of Professional Hunter	LOUIS MULLER	Address	(b) (6) BONITA SPRINGS, FL
Telephone		Licence No.	200
Number of Accompanying Guests		Fax	N/A
Are the trophies being exported after tanning and mounting?		Number of Accompanying Guests	0
Are the trophies being exported after primary treatment?		Name of Processing Agent or Taxidermist	TROPHY CONSULTANTS INTERNATIONAL
Name of Processing Agent or Taxidermist	TROPHY CONSULTANTS INTERNATIONAL	Address	4 JOSIAH CHINAMANO RD BELMONT BULAWAYO
Name of Shipping Agent	MAPLE SHIPPING AND FREIGHT	Address	4 BELMONT ROAD, BULAWAYO
Name of Foreign Agent		Address	

2. HUNTING AREAS

	Hunting Area Name	Province	Signature of Land Authority
1	Chewore Safari Area - North	Mashonaland West	
2			
3			
4			
5			
6			
7			
8			
9			
10			
11			
12			
13			
14			
15			

Date of Safari From	01-10-2018
Date of Safari To	21-10-2018
Daily Rate Charged For Big Game USD	1,350.00
Daily Rate Charged For Plains Game USD	1,350.00
Daily Rate Charged for Non hunting guests USD	1,350.00
Number of Accompanying Guests	0

ZPWMA
Date Stamp

(b) (6)

CHRIS D. PEYERK (b) (6)

(b) (6)

SHELBY TOWNSHIP, MI (b) (6)

J.P.Morgan

JPMorgan Chase Bank, N.A.
Detroit, Michigan

9-32/720

Check Fraud
Protection for Business

2/14/2019

PAY TO THE
ORDER OF

U.S. Fish & Wildlife Service

\$ **100.00

One Hundred and 00/100*****

DOLLARS

U. S. Fish & Wildlife Service



(b) (6)
AUTHORIZED SIGNATURE

MEMO

Import Permit for 2 Leopards for Chris Shea

(b) (6)

CHRIS D. PEYERK (b) (6)

(b) (6)

U.S. Fish & Wildlife Service

2/14/2019

Date	Type	Reference	Original Amt.	Balance Due	Discount	Payment
2/14/2019	Bill	Import Permit LeapCS	100.00	100.00		100.00
					Check Amount	100.00

Chase CP (b) (6) Import Permit for 2 Leopards for Chris Shea

100.00

U.S. Fish and Wildlife Service
Division of Scientific Authority
Convention on International Trade in Endangered Species of Wild Fauna and Flora
(CITES)
Record of Advice on Import Permit Application

Application Number: 31034D

Date Received by DSA: April 12, 2019

DMA Contact: Ailteas Braxton

Applicant: Christopher Michael Shea
Shelby Township, Michigan

Specimens and Species: Leopard (*Panthera pardus*)

Wild (Zimbabwe)

Two (2) personal sport-hunted trophies
(life-sized mount; skin, skull, and claws)

Recipient: Self

Type of Permit: Appendix I Import (CITES)

ADVICE

After reviewing the above permit application, we find that the proposed import is likely to be for purposes that are not detrimental to the survival of the species.

Species Background:

The leopard (*Panthera pardus*) has one of the largest geographic ranges of any terrestrial mammal in the world and occurs from southern Africa, through the Middle East, to eastern Asia from South Africa to eastern China and Russian Federation (Stein et al. 2016). The African leopard (*P. p. pardus*) is one of about nine leopard subspecies and occurs primarily in sub-Saharan regions (Jacobson et al. 2016). A habitat generalist, the leopard – all subspecies considered – occupies mesic woodlands, grassland savannas, and forests (Hunt 2011). Trees are an essential habitat component. Leopards are solitary, nocturnal, and territorial (Hunt 2011).

Home ranges are about 13–35 km² (Hunt 2011). Ambush predators, leopards prey primarily on medium-sized ungulates, especially deer (Family Cervidae) (Hanssen et al. 2017). They also scavenge prey taken by other carnivores. These carcasses are often cached in trees beyond the reach of smaller, more numerous predators (Stein et al. 2016). Adult leopards have few natural predators (Hunt 2011). The total population size of the leopard is unknown. In southern Africa, a regional range loss of approximately 21% has been reported (Stein et al. 2016). Given their larger body size, males are more desirable and thus more susceptible than females to being harvested by trophy hunters (Braczkowski et al. 2015). In general, the current population trend is declining due to harvest and habitat loss and fragmentation (Stein et al. 2016).

In 1975, the leopard as *Panthera pardus* was included in CITES Appendix I (UNEP 2018). In accordance with Resolution Conf. 10.14 (Rev. CoP16) on *Quotas for leopard hunting trophies and skins for personal use*, there are numerical limits to the quantity of trophies and skins from some sub-Saharan countries that have been approved by the CITES Parties that can be traded annually (CITES 2013).

In 1970, the leopard as *Panthera pardus* with (three subspecies) was listed as Endangered on the *United States' List of Endangered Foreign Fish and Wildlife*, the precursor to the Endangered Species Act of 1973, as amended (Service 1970). This listing was revised in 1972 with the three subspecies being deleted as separate listings and all leopard subspecies included with the species listing (*Panthera pardus*; Service 1972). This listing was modified in 1982 when certain populations were classified as Threatened (Service 1982; “In Africa, in the wild, south of, and including, the following countries: Gabon, Congo, Zaire, Uganda, Kenya”). The leopard currently is subject to a 90-day status review (Service 2016, 2017, 2018).

In 2016, the African leopard as *Panthera pardus* ssp. *pardus* was categorized as Vulnerable A2cd (ver 3.1) by the IUCN Red List (Stein et al. 2016). This rangewide finding was based on loss of habitat and prey, and exploitation. These conservation threats are not well understood, have not ceased, and are likely to continue (Stein et al. 2016).

The leopard is part of a joint initiative by the Convention on Migratory Species (CMS) and CITES: Joint CMS-CITES African Carnivores Initiative (CMS 2017a,b). Recognizing the potential benefits of working together, the two organizations have agreed to conduct joint activities addressing shared species and issues of common interest. In this regard, the two organizations have prioritized actions on the leopard, as well as the African lion (*Panthera leo*), cheetah, (*Acinonyx jubatus*), and wild dog (*Lycaon pictus*). The conservation threats to be addressed include: habitat loss and fragmentation, conflict with humans, depletion of the prey base, and unsustainable or illegal trade practices. Specific joint actions are being developed and will be implemented over the next several years (CMS 2017a). These actions include cooperative conservation programs for carnivores in the several range States, as well as specific conservation activities (e.g., illegal trade analyses, biological monitoring, and capacity building).

According to Zimbabwe Parks and Wildlife Management Authority (ZPWMA), leopards are present in protected areas including National Parks and Safari Areas, as well as private conservancies such as Bubye and Save Valley Conservancies (CITES 2018a:5). Protected areas with persisting leopard populations include Hwange, Zambezi, Matusadona, and Mana Pools

National Parks as well as Matetsi, Chirisa, Chete, Charara, Hurungwe, Chewore, Doma and Umfurundzi Safari Areas (Jacobson et al. 2016: Supp. Doc. 1). Though leopards reportedly occur outside of protected areas, they have much lower densities in areas that have been subject to human disturbance and may be extinct in the majority of unprotected areas (CITES 2018a:5; Jacobson et al. 2016: Fig. 1). Jacobson et al. estimate the extant range of leopards in Zimbabwe to be 160,000 km² (2016: Supp. Table 5), which is similar to ZPWMA's estimate of 145,000 km² (CITES 2018a:12).

No countrywide estimate of the leopard population in Zimbabwe has been made (CITES 2018a:4). Several projects are currently underway to establish population estimates, including a study by ZPWMA, Zimbabwe Professional Hunting Guides Association (ZPHGA), and Safari Operators Association of Zimbabwe (SOAZ). With guidance from an independent researcher, the team aims to use spoor transects, camera trap data, and offtake trends to estimate the leopard population and use this information to manage the population (CITES 2018a:6). Several population estimates from specific regions within Zimbabwe have been made using a combination of spoor surveys and camera traps: 193 leopards in Save Valley Conservancy in 2008, 54 leopards in the Northern Tuli Game Reserve in 2010, 315 leopards in Gonarezhou National Park in 2009, and 19 leopards in the Mangwe District in 2010 (Jacobson et al. 2016: Supp. Doc 1; IUCN/SSC Cat Specialist Group 2017:57). In 2012, landowners estimated a leopard population of 13,521 individuals on private lands (Lindsey & Chikerema-Mandisodze 2012, as cited in IUCN/SSC Cat Specialist Group 2017:58), however this estimate would mean that leopards on private lands would occur at 8.2 times the density as on Kruger National Park, South Africa, which is highly unlikely (Zimbabwe 2012:4).

In the 2016 IUCN Red List assessment, Stein et al. (2016:5) stated that it is generally thought that the Zimbabwe leopard population is healthy but declining outside of human dominated areas. The leopard population in Zimbabwe appears to be decreasing from previous estimates with leopards disappearing from areas with increased human development and intensive conflict with humans (Haton et al. 2001, du Toit 2004, Fusari et al. 2006, Lindsay et al. 2014, as cited in Stein et al. 2016:9.)

According to ZPWMA, threats to the persistence of the leopard population in Zimbabwe include habitat loss and fragmentation, decreased prey base, persecution from the growing human population, illegal wildlife trade, harvesting for ceremonial use of skins, and poorly managed hunting (CITES 2018a:4). Widespread habitat loss in combination with prey loss is estimated to have caused a 30% decline in sub-Saharan leopard populations over the last 3 generations; the projected increase in human population and their dependence on agriculture and livestock will likely contribute to the continued decline of leopards in Zimbabwe (Stein et al. 2016).

BASIS FOR ADVICE

A. Applicant Information:

1. The applicant (Christopher Michael Shea, Shelby Township, Michigan) requests authorization to import two leopard (*Panthera pardus pardus*) personal, sport-hunted trophies from

Zimbabwe.

2. The purpose of the proposed import is personal use. The leopards were taken from the wild at/near: Chewore Safari Area-North, Mashonaland West, Zimbabwe; with Trophy Consultants International; on/about October 5 and 8, 2018. Copies of Hunting Return Form – TRAS2 # 81216 and Leopard Trophy Export Tags ## ZW 072/500/2018-PAR and 073/500/2018-PAR were submitted along with the application.

B. Zimbabwe Information:

3. Leopards in Zimbabwe are managed under a sustainable use program that includes trophy hunting and are the beneficiary of several protective measures. The Parks and Wildlife Act 22/2001 (Act) is the principal legislation guiding the management of wildlife in Zimbabwe, and the ZPWMA is the governmental authority responsible for the conservation of Zimbabwe's wildlife, including leopards (CITES 2018a:11, IUCN/SSC Cat Specialist Group 2017:159). According to the ZPWMA, Zimbabwe's wildlife policy seeks to maintain a network of protected areas to conserve the country's biodiversity and natural resources, including through rural economic development and encouraging the protection of wild animals and habitats outside of protected areas (CITES 2018a:11).

The Act was amended in 2011 to increase penalties for illegal hunting, sale of illegally hunted trophies or meat, and other wildlife-related crimes (IUCN/SSC Cat Specialist Group 2017:159). The Act prohibits the hunting of any animal on any land without a permit, the hunting of wildlife in protected areas, trade in trophies or animals without a permit, and the sale of animals or trophies that were hunted without a permit (Obank et al. 2015:458). Penalties for these crimes may include fines of up to \$500 and imprisonment up to 20 years for offenses involving specially protected animals (IUCN/SSC Cat Specialist Group 2017:159). The leopard is not listed as a specially protected animal under the Act, and illegal hunting of leopards therefore does not carry these increased penalties (Obank et al. 2015:464). Other legislation includes the Protection of Wildlife Indemnity Act 21/1989, the Trapping of Animals Control Act 34/1973, and the Environmental Management Act 13/2002, which give the government of Zimbabwe the authority to protect wildlife from poachers and from harmful and dangerous hunting methods (Obank et al. 2015:462-463).

4. Zimbabwe's legislative framework is comprehensive, though it is unclear whether the penalties create a meaningful deterrent as wildlife crime remains widespread in the country (Obank et al. 2015:464, 469). There is evidence that sentences for wildlife-related crimes are applied inconsistently as courts have a wide discretion when it comes to imposing penalties (Obank et al. 2015:469). Zimbabwe has passed regulatory measures over the last decade to address corruption, however these appear to have had little impact: there have been documented incidences of known poachers avoiding investigation and prosecution, as well as allegations of ministers and officials facilitating wildlife crime (Obank et al. 2015:456). Widespread corruption must be addressed in order for the regulatory framework to effectively protect the country's wildlife.

5. In a letter dated December 6, 2017, President of Zimbabwe E. D. Mnangagwa communicated

to the United States Zimbabwe's political stability and commitment to conserving wildlife. Though the letter specifically discusses elephant conservation and trophy hunting programs, President Mnangagwa makes assurances that after a smooth transition from the previous administration, all conservation initiatives being undertaken by Zimbabwe will not be reversed, but enhanced (Zimbabwe 2017).

6. According to ZPWMA, one of the most important aspects of the country's hunting program is the delegation of authority to private and communal landowners to manage and benefit from the wildlife on their land (CITES 2018a:11). Leopard hunting in Zimbabwe occurs on private land, state land, and areas managed under the Communal Areas Management Plan for Indigenous Resources (CAMPFIRE) (CITES 2018a:11; Zimbabwe 2012:17). CAMPFIRE aims to change rural communities' perceptions of wildlife resources from a threat to their livelihoods to a sustainable revenue stream (IUCN/SSC Cat Specialist Group 2017:97). Trophy hunting has become a main source of income for the CAMPFIRE program, and has shown beneficial effects for both wildlife conservation and rural community members (Loveridge et al. 2006:230). Rural district councils within the program area set aside an estimated 36,000 km² of land for wildlife in Zimbabwe (Loveridge et al. 2006:231).

7. National leopard quotas are set annually and issued to state and private landowners (CITES 2018a:7). Allocating quotas on an annual basis allows ZPWMA to use inputs from monitoring data and stakeholders in an adaptive process (CITES 2018a:7).

8. Zimbabwe has a participatory quota setting process that is based on population data, distribution patterns, trophy quality data, local and ranger monitoring, habitat quality, hunting success rates, poaching statistics, natural mortality, diseases, and other offtakes (CITES 2018a:7-8). The quota for leopards is determined with input from stakeholders including ZPWMA field and research staff, members of local communities, hunting operators, and non-governmental biologists and researchers (CITES 2018a:7). Almost all quotas are based on a 1988 survey and distribution model done by Martin and de Meulenaer that assumes that all suitable habitat is occupied, all habitat supports maximum leopard densities, and leopard numbers can be predicted by rainfall (Zimbabwe 2016:3). The model omits other threats such as human impact and habitat fragmentation (Zimbabwe 2016:3). As accurate and current population data is largely unavailable and effective trophy monitoring hasn't been established, in practice, quotas are set based primarily on opinions of stakeholders and final approval is given by ZPWMA or the Minister of Environment and Natural Resources (Zimbabwe 2012:10). Quotas and actual offtakes have been reduced in recent years as a precautionary measure (CITES 2018a:7). A new system developed at a participatory workshop in 2016 adjusts a hunting area's allocated quota based on the ages of leopards hunted, in which hunting young leopards results in a reduced quota (CITES 2018a:10). Hunting older leopards, or no leopards, results in a maintenance of the same quota, or in some cases an increase in the area's quota (CITES 2018a:10). ZPWMA is currently testing this system and monitoring compliance through the submission of photographs, hunt returns, and other data requested by ZPWMA (CITES 2018a:10).

9. There is currently no management plan for leopards in Zimbabwe (Zimbabwe 2012:16), nor does there appear to be any formal criteria for leopard trophies (CITES 2018a:9). In 2012, Zimbabwe reported that the hunting of female leopards was prohibited based on an agreement

between ZPWMA and the Safari Operators Association of Zimbabwe (SOAZ), and that leopard trophies with a skull size smaller than 13.75 inches (width plus length) would not be allowed to be exported (Zimbabwe 2012:11). However, in their 2018 review of the CITES leopard quota, Zimbabwe did not make it clear whether only males were taken as trophies; in fact, ZPWMA states that leopards taken are “usually males” (CITES 2018a:3). Leopard trophy monitoring began in the 2009 hunting season to assess catch per unit effort, hunting success, and trophy quality (Zimbabwe 2016:5). In 2013 the monitoring began to include photographs used to age hunted leopards and it was determined that between 2013 and 2015, 90% of the leopards taken were very young (between 2-3 years of age) (Zimbabwe 2016:5-8). Though Zimbabwe incentivizes hunters and hunting areas to take older males by setting quota allocations based on trophy quality, there is currently no indication of any formal mechanism requiring compliance.

10. The long term goal of ZPWMA is sustainable leopard hunting supported across a range of land uses that contributes to maintaining wildlife, biodiversity, rural livelihoods and the national economy (CITES 2018a:9). The country’s immediate objective is to achieve a well-regulated, viable and sustainable leopard hunting operation that complies with requirements of a rigorous formal non-detriment finding (CITES 2018a:9). Zimbabwe has identified five key components for a hunting program that meets their goals (CITES 2018a:9-10):

- I. Monitoring population status and trends of leopard populations
- II. Criteria for leopard trophies
- III. Evidence-based adaptive management of quotas for hunting leopards
- IV. Reviews of policy and legislation governing leopard hunting
- V. Coordination, collaboration and program management

11. Human-leopard conflict in response to perceived or actual livestock depredation is a major threat to leopard populations in Zimbabwe (IUCN/SSC Cat Specialist Group 2017:131). Many of Zimbabwe’s wildlife reserves border agro-pastoral lands, increasing the frequency of conflict incidents (Butler 2000 as cited in IUCN/SSC Cat Specialist Group 2017:131). The projected increase of the human population in sub-Saharan Africa from 1.2 billion to 2.5 billion over the next 50 years will likely lead to expansion of human land use and intensify human-wildlife conflict (Loveridge et al. 2017:2). Lethal problem animal control (PAC) is legal in Zimbabwe, though according to the Parks and Wildlife Act (123/1991), destruction of a leopard through PAC is only allowed if an incident threatens human life (Zimbabwe 2012:9, 11). Problem animals are reported to the nearest Rural District Council office if on communal land or to ZPWMA if on private land or near a national park (Zimbabwe 2012:11). The report must then be verified by the responsible agency to ensure that a leopard has been correctly identified as the cause of conflict (Zimbabwe 2012:11). ZPWMA considers three options when dealing with a problem animal: improving livestock husbandry to reduce losses, capturing and translocating the leopard, or hunting the problem leopard as a trophy (Zimbabwe 2012:11). In most cases, ZPWMA attempts to relocate the animal, though data on the success of reducing livestock losses within Zimbabwe is unavailable (Zimbabwe 2012:11). Elsewhere, translocation has been shown to be largely ineffective in mitigating human-leopard conflict (Athreya et al. 2011 and Weilenmann et al. 2011 as cited in Zimbabwe 2012). Hunting problem animals also raises concerns about false reporting in order to obtain additional hunting permits, and it is highly likely that some leopards are killed illegally under the name of PAC (Zimbabwe 2012:9, 11).

12. Significant demand for leopard skins drives illegal killing of leopards in southern Africa (Zimbabwe 2012:9, IUCN/SSC Cat Specialist Group 2017:131). ZPWMA stated in 2012 that such killings appeared to be rare and few records of seizures occurred (Zimbabwe 2012:9), though there is now evidence for a rapid increase in wildlife crime including poaching in Zimbabwe (Obank et al. 2015). ZPWMA is lacking financial resources to effectively control protected areas within Zimbabwe, and there have been allegations that ZPWMA has been forced to allow hunting in national parks to raise funds (Obank et al. 2015:460).

13. Due to the cryptic nature and vast range of leopards in Zimbabwe, ZPWMA states that it is difficult to census the total leopard population, though many studies are currently being undertaken to get a better understanding of population (CITES 2018a:4). These studies involve academic researchers, non-profits, students, and Zimbabwe agencies and officials (CITES 2018a:6-7). They aim to measure the impacts of trophy hunting on behavioral ecology and population dynamics, train personnel in predator monitoring, estimate the national leopard population, and disseminate this information to the public (CITES 2018a:7). Zimbabwe is currently keeping quotas and actual offtake at conservative levels as a precautionary measure, demonstrating their commitment to sustainable hunting (CITES 2018a:7).

14. The CITES Scientific Authority of Zimbabwe has considered the country's leopard population and trend, the past and current levels of offtake, adaptive management of the leopard population and of leopard hunting, benefits derived from hunting, and other factors relevant to the sustainability of the export quota (CITES 2018a:12). Upon considering these factors and in accordance with Article IV of CITES and Resolution Conf. 16.7 (Rev. CoP17) on *Non-detriment findings*, the Scientific Authority of Zimbabwe concludes that the current level of offtake and the current export quota is set at a level that is not detrimental to the survival of the species in the wild (CITES 2018a:12). According to ZPWMA, the quota of 500 leopards per year is conservative and in the best interest of the conservation of the species. Zimbabwe will continue to monitor the leopard population and adaptively manage the hunting program, informing the CITES Secretariat if a significant management change occurs (CITES 2018a:51).

C. CITES Export Quota Program

15. Within the context of CITES, Zimbabwe initially had an approved export quota of 80 leopard skins established in 1983 at CoP4 (IUCN/SSC Cat Specialist Group 2017:96). At CoP5 in 1985, Zimbabwe proposed to increase its CITES annual export quota to 350 leopard trophies and skins per year to prevent the species from being viewed as an agricultural pest (CITES 1985). The increase of the quota to 350 was adopted by the Conference of the Parties in Resolution 5.13 (IUCN/SSC Cat Specialist Group 2017:96). At CoP6 in 1987, Zimbabwe requested to increase its quota to 500; the increase of the quota was deemed sustainable, accepted, and has remained at that level ever since (CITES 1987, CITES 2018a).

Although the approved CITES export quota has been 500 leopard trophies and skins per year, the actual hunting trophy exports have been less. Between 2010 and 2017, actual annual offtake ranged from 133 leopards in 2017 to 186 leopards in 2014 (averaging about 33% of the quota across this period) (CITES 2018a:9). Zimbabwe establishes national leopard quotas annually in an adaptive process that relies on monitoring data and stakeholder input. National hunting quotas

may be set higher than CITES export quotas to mitigate human-animal conflict, but hunting offtakes have been lower than both national and CITES quotas (CITES 2018a:7). Zimbabwe issued between 578 and 882 leopard hunting permits annually between 2004 and 2012, but actual hunting offtakes during this period were between 160 and 302 (Zimbabwe 2012:7-8).

16. Since 2006, according to UNEP-WCMC (2018), reported gross exports have averaged 207 trophies annually and 43 skins annually.

17. Given that leopard export quotas are developed using various methods, the Parties at CoP17 adopted four interrelated decision on Quotas for leopard hunting trophies (see AC29 Doc. 16; CITES 2017a,b). According to Decision 17.114:

Parties, which have quotas, established under Resolution Conf. 10.14 (Rev. CoP16) on *Quotas for leopard hunting trophies and skins for personal use* are requested to review these quotas, and consider whether these quotas are still set at levels which are non-detrimental to the survival of the species in the wild, and to share the outcomes of the review and the basis for the determination that the quota is not detrimental, with the Animals Committee at its 30th meeting (July 2018).

18. The results of these reviews were considered by the Animals Committee at AC30 (CITES 2018b). During this time, a working group reviewed information submitted by leopard range states and made recommendations concerning quotas for 12 African countries to the Animals Committee. For Zimbabwe:

“The WC recommends to the Animals Committee to inform the Standing Committee that it considers that the quotas for Leopards for Zimbabwe, as mentioned in Resolution Conf. 10.14 (Rev. CoP16), are set at levels which are non-detrimental to the survival of the species in the wild.”

The Animals Committee adopted this recommendation (CITES 2018c:6).

19. At the 70th meeting of the Standing Committee (SC70; Sochi, October 2018), the Chair of the Animals Committee submitted a document SC70 Doc. 55 on *Quotas for leopard hunting trophies (Panthera pardus): Report of the Animals Committee*. In the document, the Animals Committee informed the Standing Committee of the above recommendation. The Standing Committee noted the evaluation of the Animals Committee concerning the quotas for Zimbabwe in Resolution Conf. 10.14 (Rev. CoP16) and invited the Secretariat to propose to the Conference of the Parties draft amendments to Resolution Conf. 9.21 (Rev. CoP13) on *Interpretation and application of quotas for species included in Appendix I* concerning approaches to review quotas for Appendix-I species, taking into consideration the recommendations of the Animals Committee in paragraph 5 f) of document SC70 Doc. 55 and opportunities to provide assistance to range States (CITES 2018d). These results will be taken up by the 18th meeting of the Conference of the Parties in Colombo, Sri Lanka, from May 23 – June 3, 2019, under the document CoP18 Doc. 46 on *Quotas for Leopard Hunting Trophies*.

20. Therefore, based on the above information, we find that the current harvest levels are

sustainable. As such, we advise that this import is likely to be for purposes that are not detrimental to the survival of the species.

* * * * *

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* * * * *

DSA BIOLOGIST:

DSA CONCUR:



Jeffrey P. Jorgenson, Ph.D.
Biologist
Division of Scientific Authority



Eleanora Babij, Ph.D.
Chief, Branch of Consultation and Monitoring
Division of Scientific Authority



Braxton, Ailteas <ailteas_braxton@fws.gov>

Sport hunted trophy import permits....31031D, and 31034D

1 message

Braxton, Ailteas <ailteas_braxton@fws.gov>

Fri, May 3, 2019 at 10:46 AM

To: Linda Jurda-Wensink (b) (6)

Good morning,

I am trying to finalize your applications for Christopher Shea, and Chris Peyerk. Please forward their home addresses as soon as possible.

Thank you for your patience
Ailteas Braxton
Legal Examiner
U.S. Fish and Wildlife Services
Division of Management Authority
ailteas_braxton@fws.gov
703 358-1978 direct dial
703 358-2281 fax

If the information requested above is not received within 45 days, your application will be considered incomplete and will be administratively closed.



Braxton, Ailteas <ailteas_braxton@fws.gov>

[EXTERNAL] RE: Sport hunted trophy import permits....31031D, and 31034D

1 message

Linda Jurda-Wensink (b) (6)
To: "Braxton, Ailteas" <ailteas_braxton@fws.gov>

Fri, May 3, 2019 at 10:57 AM

Chris Peyerk

(b) (6)

Christopher Shea

(b) (6)

Linda

(b) (6)

@fws.gov>

Sent: Friday, May 03, 2019 10:46 AM
To: Linda Jurda-Wensink <(b) (6)>
Subject: Sport hunted trophy import permits....31031D, and 31034D

Good morning,

I am trying to finalize you applications for Christopher Shea, and Chris Peyerk. Please forward their home addresses as soon as possible.

Thank you for your patience

Ailteas Braxton

Legal Examiner

U.S. Fish and Wildlife Services

Division of Management Authority

ailteas_braxton@fws.gov

703 358-1978 direct dial

703 358-2281 fax

If the information requested above is not received within 45 days, your application will be considered incomplete and will be administratively closed.

(b) (6)

TRANSMITTAL

To:	U.S. Fish & Wildlife Service
	Division of Management Authority
	Branch of Permits, MS: IA
	5275 Leesburg Pike
	Falls church, VA 22041-3803

Date:	2-27-19
Project No.:	
Project Name:	
Location:	
DEI Job No.	

We are sending you the following:

Copies	Date	Description
1		Completed Application for 1 Lion for Chris Peyerk with Check # 21266
1		Completed Application for 2 Leopards for Chris Peyerk with C21265heck #
1		Return UPS Envelope for Chris Peyerk
1		Completed Application for 1 Leopard for Irvin Rupersburg with Check # 21269
1		Completed Application for 1 Elephant for Irvin Rupersburg with Check # 21270
1		Return UPS Envelope for Irvin Rupersburg
1		Completed Application for 1 Lion for Chris Shea with Check # 21268
1		Completed Application for 2 Leopards for Chris Shea with Check # 21267
1		Return UPS Envelope for Chris Shea

Transmitted for your action:

Comments

Linda Jurda-Wensink

Distribution: File

By:



RCVD MAR 5 2019

**Department of Interior
U.S. Fish and Wildlife Service
Federal Fish and Wildlife Permit Application Form**

Type of Activity

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

**IMPORT OF SPORT-HUNTED TROPHIES under Appendix I of
the Convention on International Trade in Endangered
Species (CITES) and/or U.S. Endangered Species Act (ESA)**

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

Section A: Complete if applying as an individual

1.a. Last Name Shea		1.b. First Name Christopher		1.c. Middle Name/Initial Michael		1.d. Suffix	
2. Date of Birth (mm/dd/yyyy)		3. Telephone Number		3.a. Alternate Telephone Number		4. E-mail address	
(b) (6)							

Section B: Complete if applying on behalf of a business, corporation, public agency, Tribe, or institution

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

Section C: All applicants complete address information

1.a. Physical address (Street address; Apartment #, Suite #, or Room #; no P.O. Boxes)					
(b) (6)					
1.b. City Shelby Township		1.c. State MI	1.d. Zip code/Postal code (b) (6)	1.e. County/Province	1.f. Country USA
2.a. Mailing address (include if different than physical address; include name of contact person if applicable)					
2.b. City		2.c. State	2.d. Zip code/Postal code	2.e. County/Province	2.f. Country

Section D: All applicants MUST complete

1. Attach the nonrefundable application processing fee in the form of a check or money order payable to the U.S. FISH AND WILDLIFE SERVICE in the amount of \$100. Federal, Tribal, State, and local government agencies, and those acting on behalf of such agencies, are exempt from the processing fee-- attach documentation of fee exempt status as outlined in instructions [50 CFR 13.11(d)].	
2. Certification: I hereby certify that I have read and am familiar with the regulations contained in Title 50 Part 13 of the Code of Federal Regulations and the other applicable parts in subchapter B of Chapter 1 of Title 50, and I certify that the information submitted in this application for a permit is complete and accurate to the best of my knowledge and belief. I understand that any false statement herein may subject me to the criminal penalties of 18 U.S.C. 1001.	
Signature of applicant/Principal Officer for permit (No photocopied or stamped signatures) Date of signature (mm/dd/yyyy)	
(b) (6) 02/18/19	
Please continue to next page	

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

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

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

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

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

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

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

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

Please provide the following information. Complete all questions on the application. Mark questions that are not applicable with "N/A". If needed, use a separate sheet of paper. On all attachments or separate sheets you are submitting; please indicate the application question number you are addressing. If applying for more than one trophy, be sure to answer questions 4-6 for each trophy addressed in this application. If importing trophies from more than one country, you must submit a separate application for each shipment in order to obtain separate import permits.

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

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

3. Disqualification factor. A conviction, or entry of a plea of guilty or nolo contendere, for a felony violation of the Lacey Act, the Migratory Bird Treaty Act, or the Bald and Golden Eagle Protection Act disqualifies any such person from receiving or exercising the privileges of a permit, unless such disqualification has been expressly waived by the Service Director in response to a written petition. (50 CFR 13.21(c)) Have you or any of the owners of the business, if applying as a business, been convicted, or entered a plea of guilty or nolo contendere, forfeited collateral, or are currently under charges for any violations of the laws mentioned above?

No Yes

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

4. For each trophy to be imported, provide:

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

Lion

b. Sex (if known). Male

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

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

b. Date wildlife is to be hunted:

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

6. **IF THE TROPHY HAS ALREADY BEEN TAKEN**, please enter the following information:

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

Chewore Safari Area - North

b. Date wildlife was hunted:

04-Oct-2018

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

Big Five Safaris (Pvt) LTD, HOP0143, Chewore North Safari Area, 54 Edinburg Rd., Vainona,
Borrowdale - P O Box CY 1949, Harare

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

Trophy Consultants International, 4 Josiah Chinamano Road
Belmont, Bulawayo, Zimbabwe

7. Please provide a copy of any applicable foreign government permits or licenses that were required to remove this animal from the wild (if you have not hunted yet and do not currently hold any such permits or licenses, please indicate so).
8. Complete name and address of overseas person or business shipping the trophy to you. If you are applying to import a trophy directly from **Namibia**, you must provide the name and address of the professional hunter listed on your Namibian hunting permit [this name will appear on the face of the export permit].
Name:
Business Name:
Address:
City:
State/Province:
Country, Postal Code:
9. For species listed under the U.S. Endangered Species Act, please be aware that the U.S. Fish and Wildlife Service (Service) must make a finding that your activities will enhance or benefit wild populations of the species involved. While we will communicate with the range country for the species you will hunt or hunted when making the required findings, if you have any information that could support this finding, it would be helpful for our review if you could provide it. Please submit such information on a separate page with your application.
- a. Do you have any information regarding the population status or trend data on the species hunted?
- b. In order to hunt, you likely paid for licenses or trophy fees. What were those fees and do you have any information on how those funds were used by either the landowner, local community, or government?
- c. Do you have information on other funding activities that are being carried out, or were carried out, by the safari outfitter, professional hunter, concession holder, or landowner that provide a conservation benefit to the species being hunted/species hunted?

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

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

I acknowledge that the sport-hunted trophy/trophies to be imported has been/will be personally hunted by my client and is being imported only for my client's personal use (i.e., not for sale, transfer, donation, or exchange that is reasonably likely to result in economic use, gain, or benefit). If applying for the import of an elephant trophy, I understand that my client may import no more than two elephant trophies in one calendar year.

Taxidermist/Broker's signature: _____ Date: _____

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

I acknowledge that the sport-hunted trophy/trophies to be imported has been/will be personally hunted by me and is being imported only for my personal use (i.e., not for sale, transfer, donation, or exchange that is reasonably likely to result in economic use, gain, or benefit). If applying to import an elephant trophy, I understand that I may import no more than two elephant trophies in one calendar year.

Applicant's signature (b) (6) _____ Date: 02/18/19

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

- 12. All international shipments must be through a designated port. A list of designated ports (where an inspector is posted) is available from [the list of designated ports](#). If you wish to use a port not listed, please contact the Office of Law Enforcement for a Designated Port Exemption Permit (form 3-200-2).

(b) (6)

J.P.Morgan

JPMorgan Chase Bank, N.A.
Detroit, Michigan

9-32/720

EZShieldSM Check Fraud
Protection for Business

2/14/2019

(b) (6)
(b) (6)
(b) (6)

PAY TO THE ORDER OF U.S. Fish & Wildlife Service

\$ **100.00

One Hundred and 00/100*****

DOLLARS

U. S. Fish & Wildlife Service

(b) (6)



MEMO

Import Permit for Lion for Chris Shea

(b) (6)

CHRIS D. PEYERK (b) (6)

(b) (6)

U.S. Fish & Wildlife Service

2/14/2019

Date	Type	Reference	Original Amt.	Balance Due	Discount	Payment
2/14/2019	Bill	Import Permit LionCS	100.00	100.00		100.00
					Check Amount	100.00

Chase CP (b) (6) Import Permit for Lion for Chris Shea 100.00

Security features. Details on back.



RCVD MAR 11 2019

LB

**Department of Interior
U.S. Fish and Wildlife Service
Federal Fish and Wildlife Permit Application Form**

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

Type of Activity

IMPORT OF SPORT-HUNTED TROPHIES under Appendix I of the Convention on International Trade in Endangered Species (CITES) and/or U.S. Endangered Species Act (ESA)

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

Section A: Complete if applying as an individual

1.a. Last Name Lott	1.b. First Name James	1.c. Middle Name/Initial Dan	1.d. Suffix
2. Date of Birth (mm/dd/yyyy)	3. Telephone Number	3.a. Alternate Telephone Number	4. E-mail address

(b) (6)

Section B: Complete if applying on behalf of a business, corporation, public agency, Tribe, or institution

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

Section C: All applicants complete address information

1.a. Physical address (Street address, Apartment #, Suite #, or Room #; no P.O. Boxes)				
(b) (6)				
1.b. City Roswell	1.c. State GA	1.d. Zip code/Postal code (b) (6)	1.e. County/Province	1.f. Country U.S.
2.a. Mailing address (Include if different than physical address; include name of recipient)				
(b) (6)				
2.b. City	2.c. State	2.d. Zip code/Postal code	2.e. County/Province	2.f. Country

Section D: All applicants MUST complete

<p>1. Attach the nonrefundable application processing fee in the form of a check or money order payable to the U.S. FISH AND WILDLIFE SERVICE in the amount of \$100. Federal, Tribal, State, and local government agencies, and those acting on behalf of such agencies, are exempt from the processing fee--attach documentation of fee exempt status as outlined in instructions [50 CFR 13.11(d)].</p> <p>2. Certification: I hereby certify that I have read and am familiar with the regulations contained in <i>Title 50 Part 13 of the Code of Federal Regulations</i> and the other <i>applicable parts in subchapter B of Chapter I of Title 50</i>, and I certify that the information submitted in this application for a permit is complete and accurate to the best of my knowledge and belief. I understand that any false statement herein may subject me to the criminal penalties of 18 U.S.C. 1001.</p>	<p>(b) (6)</p> <p align="right">3/1/2019</p>
Signature of applicant/Principal officer for permit (no photocopied or stamped signatures) Date of signature (mm/dd/yyyy)	
Please continue to next page	

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

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

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

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

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

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

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

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

Please provide the following information. Complete all questions on the application. Mark questions that are not applicable with "N/A". If needed, use a separate sheet of paper. On all attachments or separate sheets you are submitting; please indicate the application question number you are addressing. If applying for more than one trophy, be sure to answer questions 4-6 for each trophy addressed in this application. If importing trophies from more than one country, you must submit a separate application for each shipment in order to obtain separate import permits.

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

Same

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

Same

3. Disqualification factor. A conviction, or entry of a plea of guilty or nolo contendere, for a felony violation of the Lacey Act, the Migratory Bird Treaty Act, or the Bald and Golden Eagle Protection Act disqualifies any such person from receiving or exercising the privileges of a permit, unless such disqualification has been expressly waived by the Service Director in response to a written petition. (50 CFR 13.21(c)) Have you or any of the owners of the business, if applying as a business, been convicted, or entered a plea of guilty or nolo contendere, forfeited collateral, or are currently under charges for any violations of the laws mentioned above?

No Yes

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

4. For each trophy to be imported, provide:

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

Panthera leo - Lion

- b. Sex (if known).

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

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

*South Africa - Limpopo - Cosmopolite (conservancy)
Nearest town - Lephalale
LP0619*

- b. Date wildlife is to be hunted: *August 2, 2019 to August 9, 2019*

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

*Riaan Vosloo
Shingani Safaris
www.shingani.com*

6. IF THE TROPHY HAS ALREADY BEEN TAKEN, please enter the following information:

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

Not yet taken

- b. Date wildlife was hunted:

- c. Name of hunting outfitter, safari company, or professional hunter you hunted with:
- d. The current location of the trophy (address and country) [the U.S. import permit will identify this country as the country of export/re-export and must match with the foreign export/re-export document]:

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

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

Name:

Business Name: *Trophex Taxidermy*

Address: *4 Hendrik Pistorius Ave*

City: *Lephalale*

State/Province:

Country, Postal Code: *South Africa 0556*

admin@trophex.co.za

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

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

No

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

Trophy fee to be paid - \$15,000
According to the outfitter the lion concession supports 25 families - 14 people directly employed by him. There are more game per square mile than anywhere else.

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

See above
Most of the employees are involved in hunting and managing habitat for various game.

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

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

I acknowledge that the sport-hunted trophy/trophies to be imported has been/will be personally hunted by my client and is being imported only for my client's personal use (i.e., not for sale, transfer, donation, or exchange that is reasonably likely to result in economic use, gain, or benefit). If applying for the import of an elephant trophy, I understand that my client may import no more than two elephant trophies in one calendar year.

Taxidermist/Broker's signature: _____ Date: _____

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

I acknowledge that the sport-hunted trophy/trophies to be imported has been/will be personally hunted by me and is being imported only for my personal use (i.e., not for sale, transfer, donation, or exchange that is reasonably likely to result in economic use, gain, or benefit). If applying to import an elephant trophy, I understand that I may import no more than two elephant trophies in one calendar year.

Applicant's signature: _____ (b) (6) _____ Date: 3/1/2019

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

12. All international shipments must be through a designated port. A list of designated ports (where an inspector is posted) is available from [the list of designated ports](#). If you wish to use a port not listed, please contact the Office of Law Enforcement for a Designated Port Exemption Permit (form 3-200-2).

(b) (6)

3/1/19
Date

(b) (6)
2522

Pay to the Order of U.S. Fish & Wildlife Service \$ 100 -

One hundred & no/100

Dollars



Bank of America

ACH R/T 081 000052

For

(b) (6)

(b) (6)



Department of Interior
U.S. Fish and Wildlife Service
Federal Fish and Wildlife Permit Application Form

RCUD MAR 21 2019

LB

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

Type of Activity

IMPORT OF SPORT-HUNTED TROPHIES under Appendix I of the Convention on International Trade in Endangered Species (CITES) and/or U.S. Endangered Species Act (ESA)

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

Section A: Complete if applying as an individual

1.a. Last Name Fryer	1.b. First Name Kenneth	1.c. Middle Name/Initial B	1.d. Suffix (b) (6)
2. Date of Birth (mm/dd/yyyy) (b) (6)	3. Telephone Number	3.a. Alternate Telephone Number	4. E-mail address
1.a. Name of business, agency, Tribe, or institution		1.b. Doing business as (DBA)	
2. Tax identification no.		3. Description of business, agency, Tribe, or institution	
4.a. Principal officer Last name	4.b. Principal officer First Name	4.c. Principal officer Middle name/initial	4.d. Suffix
5. Principal officer title		6. Primary contact name	
7.a. Business telephone number	7.b. Alternate telephone number	7.c. Business fax number	7.d. Business e-mail address

Section C: All applicants complete address information

1.a. Physical address (Street address, Apartment #, Suite #, or Room #; no P.O. Boxes) (b) (6)				
1.b. City SAN HUIOBISPO CALIFORNIA	1.c. State (b) (6)	1.d. Zip code/Postal code (b) (6)	1.e. County/Province	1.f. Country U.S.A.
2.a. Mailing address (include if different than physical address; include name of contact person if applicable)				
2.b. City	2.c. State	2.d. Zip code/Postal code	2.e. County/Province	2.f. Country

Section D: All applicants MUST complete

1. Attach the nonrefundable application processing fee in the form of a check or money order payable to the U.S. FISH AND WILDLIFE SERVICE in the amount of \$100. Federal, Tribal, State, and local government agencies, and those acting on behalf of such agencies, are exempt from the processing fee--attach documentation of fee exempt status as outlined in instructions [50 CFR 13.11(d)].
2. Certification: I hereby certify that I have read and am familiar with the regulations contained in Title 50 Part 13 of the Code of Federal Regulations and the other applicable parts in subchapter B of Chapter I of Title 50, and I certify that the information submitted in this application for a permit is complete and accurate to the best of my knowledge and belief. I understand that any false statement herein may subject me to the criminal penalties of 18 U.S.C. 1001.
Signature of applicant/Principal Officer for permit (No photocopied or stamped signatures) Date of signature (mm/dd/yyyy) (b) (6) 3/12/19

Please continue to next page

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

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

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

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

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

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

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

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

Please provide the following information. Complete all questions on the application. Mark questions that are not applicable with "N/A". If needed, use a separate sheet of paper. On all attachments or separate sheets you are submitting; please indicate the application question number you are addressing. If applying for more than one trophy, be sure to answer questions 4-6 for each trophy addressed in this application. If importing trophies from more than one country, you must submit a separate application for each shipment in order to obtain separate import permits.

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

SAME AS page 1

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

Kenneth Feyer

3. Disqualification factor. A conviction, or entry of a plea of guilty or nolo contendere, for a felony violation of the Lacey Act, the Migratory Bird Treaty Act, or the Bald and Golden Eagle Protection Act disqualifies any such person from receiving or exercising the privileges of a permit, unless such disqualification has been expressly waived by the Service Director in response to a written petition. (50 CFR 13.21(c)) Have you or any of the owners of the business, if applying as a business, been convicted, or entered a plea of guilty or nolo contendere, forfeited collateral, or are currently under charges for any violations of the laws mentioned above?

No Yes

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

4. For each trophy to be imported, provide:

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

Panthero leo

b. Sex (if known).

MALE

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

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

SAVE CONSERVANCY
ZIMBABWE, AFRICA
see attached.

b. Date wildlife is to be hunted:

July 15, 2019 to August 5 2019

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

PRO SAFARIS-AFRICA
Louis Muller
INFO @ PRO-SAF.COM

6. IF THE TROPHY HAS ALREADY BEEN TAKEN, please enter the following information:

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

N/A

b. Date wildlife was hunted:

N/A

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

N/A

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

N/A

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

Have Not Hunted yet.

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

Name:

Louis Muller owner Part-Hunter Adam Goosen

Business Name:

PRO SAFARIS - AFRICA

Address:

20 HADDON AVE.

City:

KHUMALO, Bulawayo, Zimbabwe, Africa.

State/Province:

Country, Postal Code:

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

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

See attached

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

Trophy fee for lion \$35,000 if taken
Daily rate 450⁰⁰ x 18.
See attached.

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

See attached.

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

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

I acknowledge that the sport-hunted trophy/trophies to be imported has been/will be personally hunted by my client and is being imported only for my client's personal use (i.e., not for sale, transfer, donation, or exchange that is reasonably likely to result in economic use, gain, or benefit). If applying for the import of an elephant trophy, I understand that my client may import no more than two elephant trophies in one calendar year.

Taxidermist/Broker's signature: _____ Date: _____

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

I acknowledge that the sport-hunted trophy/trophies to be imported has been/will be personally hunted by me and is being imported only for my personal use (i.e., not for sale, transfer, donation, or exchange that is reasonably likely to result in economic use, gain, or benefit). If applying to import an elephant trophy, I understand that I may import no more than two elephant trophies in one calendar year.

Applicant's signature: _____ (b) (6) _____ Date: 2/12/19

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

- 12. All international shipments must be through a designated port. A list of designated ports (where an inspector is posted) is available from [the list of designated ports](#). If you wish to use a port not listed, please contact the Office of Law Enforcement for a Designated Port Exemption Permit (form 3-200-2).

SAN Francisco, California
Broker: Coppermith



Carnivore Densities in the Savé Valley Conservancy
Results of the 2017 Spoor Survey & Wild Dog Monitoring Project
Jessica Watermeyer and Dr Rosemary Groom, African Wildlife Conservation Fund

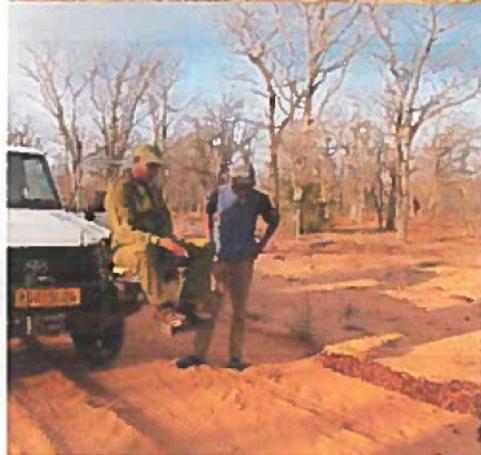
Introduction

The African Wildlife Conservation Fund carries out an annual large carnivore spoor survey in order to assess population trends of carnivores within the Savé Valley Conservancy (SVC / the conservancy) to aid management decisions. A standardised methodology is used to ensure consistency through time and comparability with other studies. Since 2008, the spoor surveys have been done using the same roads and the same observer.

Spoor surveys have been shown to be an effective and efficient means to assess wildlife densities (Stander 1998; Funston et al. 2001; Davidson & Romañach 2007; Funston et al 2010) with strong correlations existing between spoor density and true density. The technique is considered to produce reliable estimates for lions, spotted hyenas, and leopards, when sample sizes (spoor encounter rates) are sufficient. Other carnivores are included in our counts simply to monitor trends over time.

This report presents the results of the October 2017 carnivore spoor survey for the SVC, together with results from the long term wild dog monitoring project, and looks at trends in the main carnivore species over time.

AWCF head scout, Rueben Bote, and attachment student, Nkosilathi Ngwenya, identifying spoor.



Methodology

The 2017 carnivore spoor survey used the methods pioneered in SVC by Davidson and Romañach (2007), based on those used by Stander (1998) in Namibia. Exactly the same methodology has been used annually since 2008. Road transects were chosen throughout the SVC to represent a fair coverage of all (non-resettled) areas, and these transects were scanned for spoor. The number of kilometres of transects surveyed was chosen to maintain consistency with previous spoor surveys. Thus, for every 6-7km² of

sample area, 1km of transect was surveyed, creating a penetration density (expressed as a ratio of kilometres of transect surveyed to total sample area) of between 1:6 and 1:7.

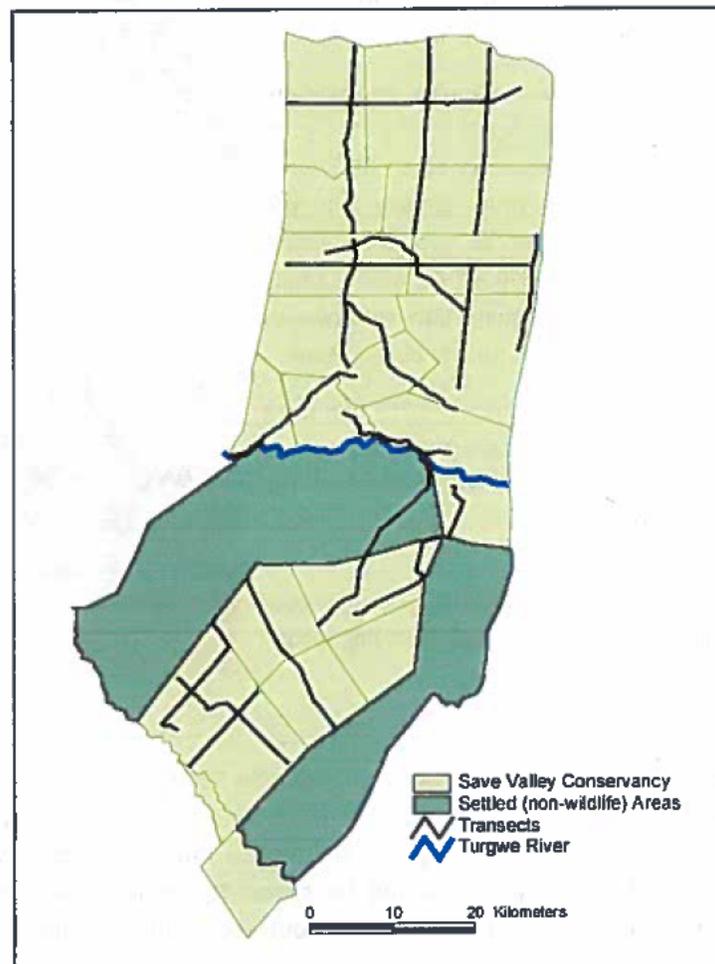
The total area of the Savé Valley Conservancy is 3490km². However, the effective wildlife area (excluding the 1051km² of resettled land), comes to only 2439km²; 1639km² north of the Turgwe river and 800km² south of the Turgwe (see Table 1).

In northern SVC, the total length of all transects combined was 259.7 km, giving a penetration ratio of 6.31. In southern SVC, the combined transect length was 144 km, giving a penetration ratio of 5.56. For the conservancy as a whole, 403.7 km were driven (penetration ratio 6.04).

Transects surveyed were the same as those used in 2007-2017 (Figure 1). Each transect was driven at a speed of between 10 and 20 km/hr with one tracker, AWCF head scout Rueben Bote, sitting on the front of the vehicle scanning for spoor. Transects ranged between 12.7 km and 29.2 km in length, with a mean transect length of 21.2 km.

Each transect survey started as close to sunrise as possible, and wherever feasible was driven from west to east to ensure the best possible tracking conditions. Only tracks less than 24 hours old were counted. Road conditions are generally sandy, such that spoor is relatively easy to see. Where possible, spoor of individual animals were followed to reduce the likelihood of that individual being counted twice on a given transect. Spoor was recorded for all mammalian carnivores bigger than a genet.

Figure 1. Map of the transects driven – October 2017



Results

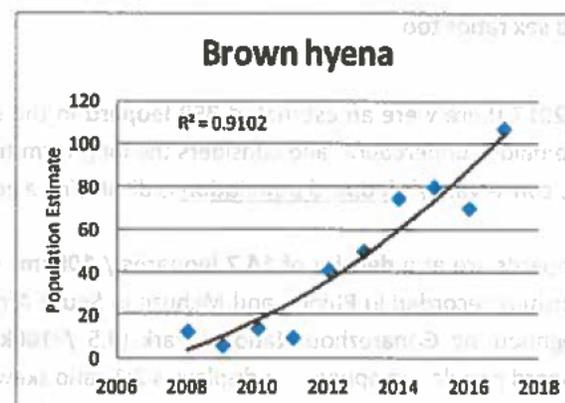
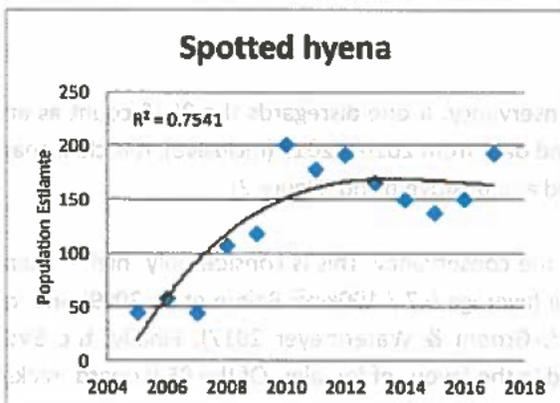
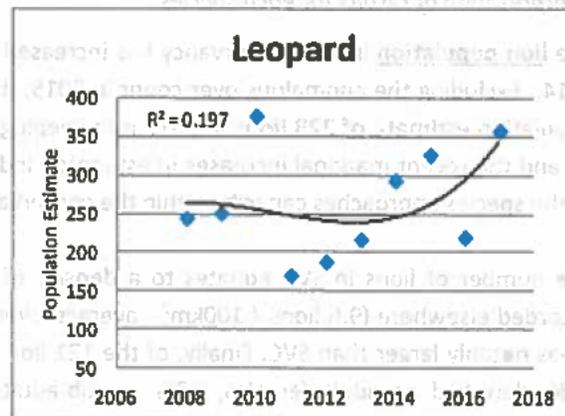
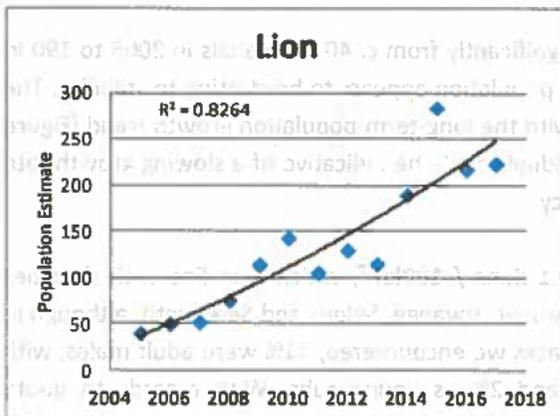
Table 1: Summary of survey parameters (2017)

Parameter	Northern SVC	Southern SVC	Total SVC
Area (km ²)	1639	800	2439
Total number of km driven	269.7	132	401.7
Penetration ratio	6.08	6.06	6.07

Table 2: Population estimates of the key carnivore species in the whole of Savé Valley Conservancy from 2008-2017 (from 2005 – 2017 for lion and spotted hyena).

Data for lion, leopard, spotted and brown hyenas and black backed jackal are from spoor surveys; data for wild dogs is from the Lowveld Wild Dog Project's direct monitoring efforts (counts are taken from April of each year and include adult and yearling wild dogs).

Species	2005	2006	2007	2008	2009	2010	2011	2012	2013	2014	2015	2016	2017
Lion	40	50	52	76	114	143	105	130	115	190	284	217	223
Leopard				245	252	378	172	189	218	295	328	221	359
Spotted hyena	44	58	44	107	118	201	178	192	166	150	137	150	193
Brown hyena				12	6	14	10	41	50	75	80	70	107
African Wild dog				45	60	64	61	86	90	81	91	99	94
Black backed jackal				188	190	157	141	151	199	229	241	234	296



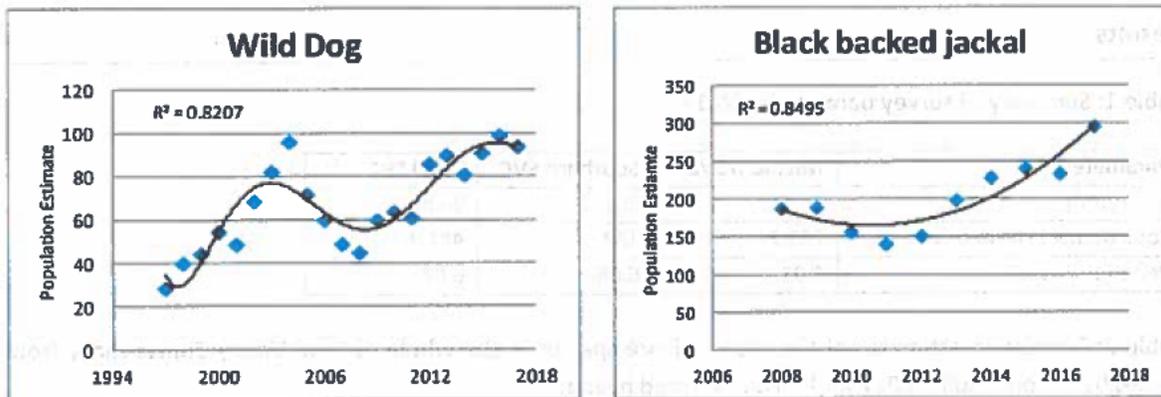


Figure 2: Trends in the populations of key carnivores in SVC for all years for which data is available. Data for lion, leopard and spotted and brown hyenas and black backed jackal are from spoor surveys; data for wild dogs is from the Lowveld Wild Dog Project's direct monitoring efforts (counts are taken from April of each year and include adult and yearling wild dogs). A breakdown of all survey results for all species between the north and south of the conservancy is given in Appendix 1.

Discussion

The results for each species are stable/increasing. The trend data suggests that 2016 was a slight undercount for all species (as was also the case in the Gonarezhou National Park survey), and that 2015 was most likely an over count for lion (and maybe for leopard).

Interpretation of results for each species

The **lion population** in the conservancy has increased significantly from c. 40 individuals in 2005 to 190 in 2014. Excluding the anomalous over count in 2015, the population appears to be starting to stabilise. The population estimate of 223 lions in 2017 is in keeping with the long-term population growth trend (Figure 2), and the recent marginal increases in estimated individuals could be indicative of a slowing growth rate as the species approaches capacity within the conservancy.

The number of lions in SVC equates to a density of 9.1 lions / 100km², which is in line with densities recorded elsewhere (9.6 lions / 100km² - average over Kruger, Hwange, Selous and Serengeti), although in areas notably larger than SVC. Finally, of the 121 lion tracks we encountered, 31% were adult males, with 55% identified as adult females, 12% as sub-adults and 2% as young cubs. With regards to quota considerations, it is important to not only consider the population trend of the species, but age grouping and sex ratios too.

In 2017 there were an estimated 359 leopard in the conservancy. If one disregards the 2016 count as an anomalous undercount, and considers the long-term trend data from 2010 – 2017 (inclusive), it is clear that the conservancy's **leopard population** is displaying a good and positive trend (Figure 2).

Leopards are at a density of 14.7 leopards / 100km² in the conservancy. This is considerably higher than densities recorded in Phinda and Mkhuze in South Africa (average 9.7 / 100km²; Balme et al. 2009) and in neighbouring Gonarezhou National Park (9.5 / 100km²; Groom & Watermeyer 2017). Finally, the SVC leopard population appears to displays a 2:1 ratio skewed in the favour of females. Of the 85 leopard tracks

we recorded, 32% were adult males, 64% were adult females, with one sub-adult (1%) being recorded and three cubs (3%).

Derivation of population estimates from spoor densities is controversial for leopards (there are several different equations available which give different numbers) so the numbers themselves should be treated with caution. Looking ahead, it may be useful to adopt alternative research methods (e.g. mark recapture camera trap survey) to calibrate the survey results, and obtain a more comprehensive understanding of leopard numbers in the conservancy.

Spotted hyenas appear to have stabilised over the last few years at between 150-200 individuals. There were an estimated **193 spotted hyenas** in 2017. The hyena population could be doing better in light of the recently stabilising lion population, but we will need to monitor the population to determine if a true trend is emerging. Likewise, one must not overlook that the possible causes of the recent slight population decline between 2012-2016 (prey availability, intra-specific competition, hunting pressure, anthropogenic mortality etc.) may still be of consequence.

Spotted hyena's are at a density of **7.9 spotted hyenas / 100km²**. This is lower than other populations; 13.5 / 100km² in Kruger (Mills 1985), 17.0 / 100km² in Hwange (Bowler 1992), and 9.7 / 100km² in Gonarezhou National Park (Groom & Watermeyer 2017). Given the relatively lower density of the species in the conservancy, they may still increase more.

There were an estimated **107 brown hyenas** in the conservancy in 2017. Overall and ignoring the 2016 undercount, the **brown hyena population** is displaying a stable and positive growth trend (Figure 2). The estimated density of brown hyenas was **4.4 brown hyenas / 100km²** in 2017, which is higher than the average (2.5 brown hyenas / 100km²) over the last few years (2012-2015).

The **African wild dog** population appears to be levelling off. From our comprehensive and direct monitoring of the species, there are **94 adult and yearling wild dogs** in the conservancy (**3.9 wild dogs / 100km²**). Average wild dog densities are generally lower (average 2.5 wild dogs / 100km² across five populations; Pole 1999). The spoor survey results estimated 313 wild dogs in the conservancy, with a density of **12.8 African wild dogs / 100km²**. This is clearly a significant overestimate of the wild dog population, and serves to demonstrate that spoor surveys are not a reliable indicator of wild dog numbers.

When counts include pups (as spoor surveys do); the numbers are likely to be higher (particularly in October when densities are highest because it is directly after the denning season). Further, there is the potential to 'hit' or 'miss' a large pack of wild dogs during a spoor survey which can have a large effect on the results. However, looking at the detailed monitoring results, the long term trend for the species is as expected. Wild dogs are a classic 'boom and bust' species showing major population fluctuations over time.

There has been a notable increase in the **black backed jackal** population in the conservancy, from an estimated 241 jackals in 2015 and 234 jackals in 2016, to **296 black backed jackals** in 2017. Overall, the jackal population is displaying a stable positive growth trend (Figure 2). The estimated density of jackals was **12.1 jackals / 100km²** in 2017.

We once again stress, that the spoor encounter rate for **cheetahs** in the conservancy is very low, and thus it is impossible to accurately estimate the number of resident cheetahs, even with large confidence intervals. However, data from the spoor survey suggests there to be a minimum of four cheetahs in the whole

conservancy at a density of 0.2 cheetahs / 100 km². This is on the low end of the spectrum when one considers the range of cheetah densities elsewhere (excluding highly managed fenced reserves in South Africa); for example, 0.2 cheetah / 100km² on Namibian farmlands and in the Sahara, and up to 2.5 cheetah / 100km² in the Serengeti National Park (IUCN/SSC 2015).

Although anecdotal evidence suggests the population may be picking up slightly, we can safely say the population is still very low (only two cheetah tracks were seen in the 403.7 km of transects driven). However, spoor surveys are not appropriate techniques for monitoring cheetah because they use the roads a lot less than other large carnivores, and the species would be more accurately surveyed by a mark recapture camera trap survey using cheetah play trees and other key areas. The Cheetah Conservation Project Zimbabwe, which collected updated photographic information on cheetah throughout Zimbabwe, estimates c. 12 adult cheetahs in SVC (van der Meer, 2016).

Word of caution

When interpreting the results in the graphs and tables at the end, please do so with caution, especially to quote specific numbers. For lions and hyenas we are confident that these spoor surveys are relatively accurate in the numbers they predict, although anomalous over and undercounts can hinder this. Likewise, we can trust the numbers for wild dogs, as they are from the detailed population monitoring study. For leopards however, several different equations (all considered suitable for estimating leopard numbers from spoor) can give different population estimates from each other. The spoor survey technique has not been calibrated for species like jackals, civets, even brown hyenas, so while the data is useful for looking at trends, using population figures directly from the graphs for these species is inadvisable.

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Appendix 1: All Spoor Survey Results for All Species Counted (2017)

NORTH SVC												
Species	Survey Area (km ²)	Est. population (Total area)	Equation Used	Est. density (Animals/100km ²)	Distance covered (km)	No. of spoor counted	Spoor frequency (km/spoor)	Transsect length (km)	Penetration (Area/length)	Spoor density (Spoor/100km)	Sum of transects	Sum of routes
Black-backed Jackal	1639	278,042,434	Leopard (Y=0.6993X)	16,96415094	259.7	63	4.122222222	259.7	6.311128225	24.25876011		
Brown hyaena	1639	92,364,6238	Lion (Y=0.3049X)	5.635425491	259.7	48	5.410416667	259.7	6.311128225	18.48286484		
Cheetah	1639	3,848,525,992	Lion (Y=0.3049X)	0.234809395	259.7	2	129.85	259.7	6.311128225	0.770119369		
Civet	1639	759,099,9784	Leopard (Y=0.6993X)	46.3148248	259.7	172	1.509883721	259.7	6.311128225	66.23026569		
Honey Badger	1639	119,161,0431	Leopard (Y=0.6993X)	7.270350404	259.7	27	9.618518519	259.7	6.311128225	10.39661147		
Leopard	1639	291,282,5499	Leopard (Y=0.6993X)	17.77196765	259.7	66	3.934848485	259.7	6.311128225	25.41393916		
Lion	1639	188,577,7736	Lion (Y=0.3049X)	11.50566038	259.7	98	2.65	259.7	6.311128225	37.73584906		
Spotted hyaena	1639	138,546,9357	Lion (Y=0.3049X)	8.453138236	259.7	72	3.606944444	259.7	6.311128225	27.72429727		
Wild dog	1639	277,093,8714	Lion (Y=0.3049X)	16.90627647	259.7	144	1.803472222	259.7	6.311128225	55.44859453		
African Wildcat	1639	22,066,85984	Leopard (Y=0.6993X)	1.346361186	259.7	5	51.94	259.7	6.311128225	1.925298421		
SOUTH SVC												
Species	Survey Area (km ²)	Est. population (Total area)	Equation Used	Est. density (Animals/100km ²)	Distance covered (km)	No. of spoor counted	Spoor frequency (km/spoor)	Transsect length (km)	Penetration (Area/length)	Spoor density (Spoor/100km)	Sum of transects	Sum of routes
Black-backed Jackal	800.57	27,214,37644	Leopard (Y=0.6993X)	3.399375	144	7	20.57142857	144	5.559513889	4.861111111		
Brown hyaena	800.57	16,950,95785	Lion (Y=0.3049X)	2.117361111	144	10	14.4	144	5.559513889	6.944444444		
Cheetah	800.57	0	Lion (Y=0.3049X)	0	144	0	0	144	5.559513889	0		
Civet	800.57	233,266,0838	Leopard (Y=0.6993X)	29.1375	144	60	2.4	144	5.559513889	41.66666667		
Honey Badger	800.57	3,887,768,063	Leopard (Y=0.6993X)	0.485625	144	1	144	144	5.559513889	0.6944444444		
Leopard	800.57	73,867,59319	Leopard (Y=0.6993X)	9.226875	144	19	7.578947368	144	5.559513889	13.194444444		
Lion	800.57	38,987,20305	Lion (Y=0.3049X)	4.869930556	144	23	6.260869565	144	5.559513889	15.972222222		
Spotted hyaena	800.57	55,938,1609	Lion (Y=0.3049X)	6.987291667	144	33	4.365636364	144	5.559513889	22.91666667		
Wild dog	800.57	44,072,4904	Lion (Y=0.3049X)	5.505138889	144	26	5.538461538	144	5.559513889	18.05555556		
African Wildcat	800.57	0	Leopard (Y=0.6993X)	0	144	0	0	144	5.559513889	0		

TOTAL SVC		Survey Area	Est. population	Equation Used	Est. density	Distance covered	No. of spoor	Spoor frequency	Transsect length	Penetration	Spoor density
Species	Total SVC (km2)	(Total area)	Stander-1998	(Animals/100km2)	(km)	counted	(km/spoor)	(km)	(Area/length)	(Spoor/100km)	
				Y=0.3049X Y=0.6993X	Sum of transects			Sum of routes			
Black-backed Jackal	2439	295,7430988	Leopard (Y=0.6993X)	12.12558831	403.7	70	5.767142857	403.7	6.041615061	17.33960862	
Brown hyaena	2439	106,8411291	Lion (Y=0.3049X)	4.380530097	403.7	58	6.960344828	403.7	6.041615061	14.36710429	
Cheetah	2439	3,684176864	Lion (Y=0.3049X)	0.151052762	403.7	2	201.85	403.7	6.041615061	0.495417389	
Civet	2439	980,1771276	Leopard (Y=0.6993X)	40.18766411	403.7	232	1.740086207	403.7	6.041615061	57.46841714	
Honey Badger	2439	118,2972395	Leopard (Y=0.6993X)	4.850235323	403.7	28	14.41785714	403.7	6.041615061	6.935843448	
Leopard	2439	359,11662	Leopard (Y=0.6993X)	14.72392866	403.7	85	4.749411765	403.7	6.041615061	21.05523904	
Lion	2439	222,8927003	Lion (Y=0.3049X)	9.138692098	403.7	121	3.336363636	403.7	6.041615061	29.97275204	
Spotted hyaena	2439	193,4192854	Lion (Y=0.3049X)	7.930270002	403.7	105	3.844761905	403.7	6.041615061	26.00941293	
Wild dog	2439	313,1550334	Lion (Y=0.3049X)	12.83948477	403.7	170	2.374705882	403.7	6.041615061	42.11047808	
African Wildcat	2439	21,12450706	Leopard (Y=0.6993X)	0.866113451	403.7	5	80.74	403.7	6.041615061	1.238543473	

The Savé Valley Conservancy Lion Management Plan, 2011

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Executive summary

Although lion populations in African savannas are generally declining, there are several examples in southern Africa where lions have been reintroduced to private land, and where due to the protection afforded, are increasing in numbers. Although increases are typically a desired management outcome, inevitably most reserves reach a point when management decides that there are now sufficient lions to meet the reserves objectives, necessitating population control measures. Population control of lions does, however, often create management dilemmas as it is not always clear what approach will work best given the specific set of circumstances and budgetary constraints. In order of seeming preference the measures typically employed to control lion populations include a) translocation of subadults to new reserves, b) contraception of breeding lionesses, c) culling (including trophy hunting), and d) social manipulation.

All of these management options require a degree of population monitoring, which is often more costly than the management intervention itself. Although excess subadult, and even adult, lions could be removed from the Savé Valley Conservancy, it is not clear that there are any immediate destinations that would be suitable for these animals to be reintroduced into. Thus translocation, although useful, is not likely to remove sufficient lions to be

considered as a key approach for the conservancy. Contraception can be successfully applied in small reserves where resources, habitat and lion behaviour allow intensive monitoring and the manipulation of breeding rates. However, currently in the conservancy the degree of lion monitoring precludes contraception being considered as the main approach to population regulation.

As the numbers of lions in many southern African reserves have reached saturation, now days many reserves are faced with the need to cull lions. Typically this is achieved through the shooting of excess independent subadults, male coalitions, and occasionally lionesses from prides. The latter option is problematic in that it induces fear in the lions and thus affects game viewing opportunities. Few reserves are large enough for more natural population regulation mechanisms to be applied, but these can be simulated on most. Logically population control methods that simulate natural processes are likely to produce the most desirable outcome, with the minimum intervention, and thus minimum social disruption. Social disruption *per se* is a fourth population management approach that can be applied but is generally avoided because of how it may affect the tourism value of lions in many reserves.

Thus although all feasible approaches to lion population control should be investigated, currently culling, ideally as a trophy hunting exercise, is the most suitable option for the Savé Valley Conservancy. However, the lion population in the conservancy is large enough that a culling approach whereby lions of the appropriate sex and age are trophy hunted may be sufficient to induce population stability without having to resort to a more generalised culling approach. To date the aim for trophy hunting lions in the conservancy has been economic, with population management recently having become an additional objective. The challenge for conservancy management is to reliably set an off take or quota that meets the economic expectations and effectively limits lion population growth.

The basis of this plan draws on research findings that indicate that lion populations are more resilient to trophy hunting when only adult male lions are hunted. However, it is possible that stabilizing lion population growth when they have not reached carrying capacity may not be achieved through sustainable use models based on only hunting mature males. Thus it is likely that female lions will have to comprise a proportion of the quota to effectively limit population growth. Using this premise lion hunting in the conservancy could be manipulated in the following ways to maximise hunting returns while effectively limiting population growth:

1. Hunting male lions at an age threshold that will stabilize population growth

Although infanticide by adult male lions can increase the risk of population extinction, trophy hunting can be sustained simply by hunting males above a minimum age threshold. This strategy can maximize both the quantity and the quality of the long-term kill. Thus any

male older than five years of age can be safely hunted without negative effects on the population. This is proposed as the key lion population management tool to be employed in the conservancy.

2. Hunting males out of male coalitions that are large or defend key territories

Male lions reach peak reproductive success (as measured by the number of offspring surviving to 2 years of age) at 8 years of age. But males ≥ 7 -8 years of age are the most suitable age class for high quality trophies. However, in certain circumstances very large coalitions acquire territories at 4-5 years of age. These coalitions can usefully be reduced in size by hunting males out of them, which may delay the age at which they breed.

3. Hunting lionesses in areas where there has been a history of conflict

By monitoring problem animal reports it should be possible to identify areas of the conservancy that are particularly prone to these issues. While it is not advocated that problem causing lions are hunted as trophies, it could be useful to proactively hunt either subadult lionesses or lionesses from small less important prides in these areas. This intervention could reduce the future risk of livestock killing, but alleviates the possibility of unnecessarily classifying any lioness as a problem animal in order to get an allocation to hunt. In terms of problem animal control, sometimes repeat offending lions or lionesses are best shot to resolve conflict problems. For the reasons given, however, it is not suggested that these problem animals are trophy hunted. They should preferably be destroyed by conservancy members in collaboration with conservancy management.

4. Hunting older females from key prides

Although it has been reported in the literature that hunting lionesses can lead to population declines, there are natural scenarios that induce adult female mortality that could be simulated to control lion population growth in the conservancy. Lionesses in large dominant prides sometime kill lionesses from neighbouring prides in territorial fights. But in a population below carrying capacity one might expect fewer territorial fights. Thus one might simulate the 'predatory effect' of neighbours. Thus females to be hunted should be selected from less important prides keeping the nucleus of the dominant prides intact, especially if that meets emerging photo tourism objectives. Dominant prides typically occupy territories including multiple river intersections and have large resident herds of buffalo.

For the seasons 2012-2014 it is proposed that all male lions of five years or older are placed on quota, and that some lionesses are additionally placed on quota. This should equate to a male quota of at least eight males, and 3-5 females, per year. The outcome of this should be monitored by annual spoor surveys, a second conservancy-wide lion census in 2015, and a radio-tracking based monitoring program for the next three years. The objective of the radio-tracking study will be to try and determine the effects of this hunting strategy on key

demographic patterns. The off take strategy for lions in the Savé Valley Conservancy should be supported by the following activities:

1. Lion populations should be monitored via spoor counts, manager's estimates and for the next three years via radio-tracking and direct counts compiled during an annual workshop to help set the following year's quota.
2. Long-term records of quotas, number of licenses issued, and off take should be maintained and reported by the conservator on annual basis.
3. Measurements of lion skull size as well as body size should be recorded according to the guidelines specified in Appendix 2 of this plan for all lion shot, and where possible the individual should be identified by reserve management to assure all involved that an appropriate lion was shot.
4. Trophy age should be assessed by a combination of tooth development and wear, nose pigmentation, mane development, etc (see Appendix 2).
5. Hunters should record locations as accurately as possible of all lion shot using a GPS with records going to a central database to monitor intensity of use of certain areas.
6. The professional hunters should adhere to high ethical standards in terms of what is fair chase and in trophy selection.
7. Safaris should not be marketed to clients as "sure things," to relieve professional guides somewhat from pressure at having to deliver a lion, regardless of quality.

Problems with the implementation of any lion management plan, however, include the fact that lions are difficult to census and available techniques are prone to statistical problems. These issues of population monitoring can be resolved in four ways with increasing levels of certainty and cost, from surveys of landowners and managers to get estimates of population size and structure, to long-term direct monitoring. It is proposed that manager surveys (manager estimates) and track frequency estimates are conducted annually, and that the call-in survey conducted in June/July 2011 be repeated in 2015. However, it is also important to secure funding for long term direct monitoring. Additionally careful monitoring of hunted lions should be mandatory (see Appendix 1). Based on the respective recent surveys there currently seem to be about 170 lions in the conservancy, as detailed in the table below.

Survey method used	SVC lion population estimate
Spoor estimate from 2010	148
Call-up estimate	168 (95% confidence limits: 128-207)
Managers estimate	162

An additional concern is the management of livestock predating lions. Although more comprehensive details are presented in the plan, the two key issues to address with all stakeholders to reduce conflict are that:

- a. All grazing livestock should be accompanied by a herder and at least two dogs and donkeys that are wary of lions (and other predators).
- b. All livestock should be kraaled at night in lion proof bomas (at least 6 foot high and non-see-through) with at least two herders (owners) and two dogs in attendance.

If these fairly simple measures are in place relatively few conflict situations will arise. The appropriate materials for boma construction vary from site to site, but in the conservancy there should be no shortage of mopane trees for stout pole boma constructions, augmented by old fencing materials (see page 7, 10 and 21 of the toolkit). One of the key weak points in bomas is the gates. Corrugated iron, or flattened oil/diesel drums, can be fashioned into useful and effective gates. Dogs are key to the success of most mitigation measures (see page 16 and 17 of the toolkit), but must be vaccinated to avoid disease transmission. Conservancy members should lobby the authorities in the area for comprehensive vaccination of all dogs.

It is also important to reach out to the communities to assist in educating about predators and how to live with them, and for creating awareness and better attitudes generally (see pages 26 to 31 of the toolkit). Existing outreach programs by various conservancy constituencies should be supported by conservancy members and by a conservancy conservation fund.

All livestock predation events should be well reported and any interventions should follow a protocol best established in a work shop process with all stakeholders involved. While habitual livestock killing lions might best be destroyed, this should only be done when other mitigation measures have been attempted, and should not be used as a trophy hunting opportunity. Thus all destruction of problem lions should be undertaken by conservancy members and staff.

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1. Introduction

Lions are a powerful cultural symbol of Africa, and an important indicator of an area's wildness. Lions are also a key species for photo-tourism, safari trophy hunting, and research. As a key member of the Big Five they form an integral component of the classical African hunting safari. However, lions are increasingly threatened, with much of their former range now lost. Where lions still survive, they can be a major predator of domestic livestock, presenting challenges and hardship to those who live amongst them. Thus whilst lions are a major source of economic benefit being one of Africa's most important tourism attractions, they can also be an economic and dangerous liability.

In 2002 the Zimbabwe lion population was estimated to be between 1,000-1,700 animals (Chardonnet 2002, Bauer and Van der Merwe 2004,) with an estimated range of c. 90,000 km². However, to date information on population status, current distribution and trends still remain lacking for most major wildlife areas in Zimbabwe, although there are estimates of numbers for some areas. Lion specific surveys and research have largely been limited to national parks and wildlife estates, notably Hwange National Park, the Matetsi Safari Area in northwest Matabeleland, and Mana and Matusadona National Parks in the Zambezi Valley (Monks 2005). In the south-east lowveld lions have been monitored in different areas using a combination of track frequency counts, call-in surveys, and direct monitoring. Track surveys have been conducted in Savé Valley Conservancy from 2007-2010 (Groom 2008-2010). Call-in surveys have been conducted in Gonarezhou National Park (Groom & Funston 2010, Groom & Funston in prep) and sporadically in Savé Valley Conservancy from 1996 to 2007 (Pole 1999; Pole 2003), and lions have been directly monitored in Malilangwe.

Previously in this region lions were largely extirpated by cattle ranchers and until quite recently were only resident in and around Gonarezhou National Park. They did, however, re-colonise the Savé Valley Conservancy in about 2000, and have been increasing ever since. The recent rate of recovery has fuelled concerns about the impact on various ecological and economic processes, necessitating a comprehensive management plan with appropriate options.

1.1 Savé Valley Conservancy

During the 1980s and 1990s game ranching developed as a major land use in the south-east Lowveld of Zimbabwe. In several areas, ranchers cooperated to form large collaboratively-managed wildlife areas, or conservancies. The most notable example of this was the 3,450 km² Savé Valley Conservancy, created in 1991 from 18 former cattle ranches (Figure 1). The natural land cover is deciduous woodland savanna dominated by *Colophospermum mopane*, Acacia-Combretum woodland and *Acacia tortillis* woodland (Pole 2004). Following a bad drought in 1991/1992, most of the conservancy's cattle were removed and the focus shifted

to development of multi-use wildlife production systems based on high quality tourism (Pole 1999). All internal fences were removed and a double 350 km perimeter game fence was constructed around the perimeter of the conservancy. Today, the conservancy comprises 23 individual properties, constituting 18 management units.

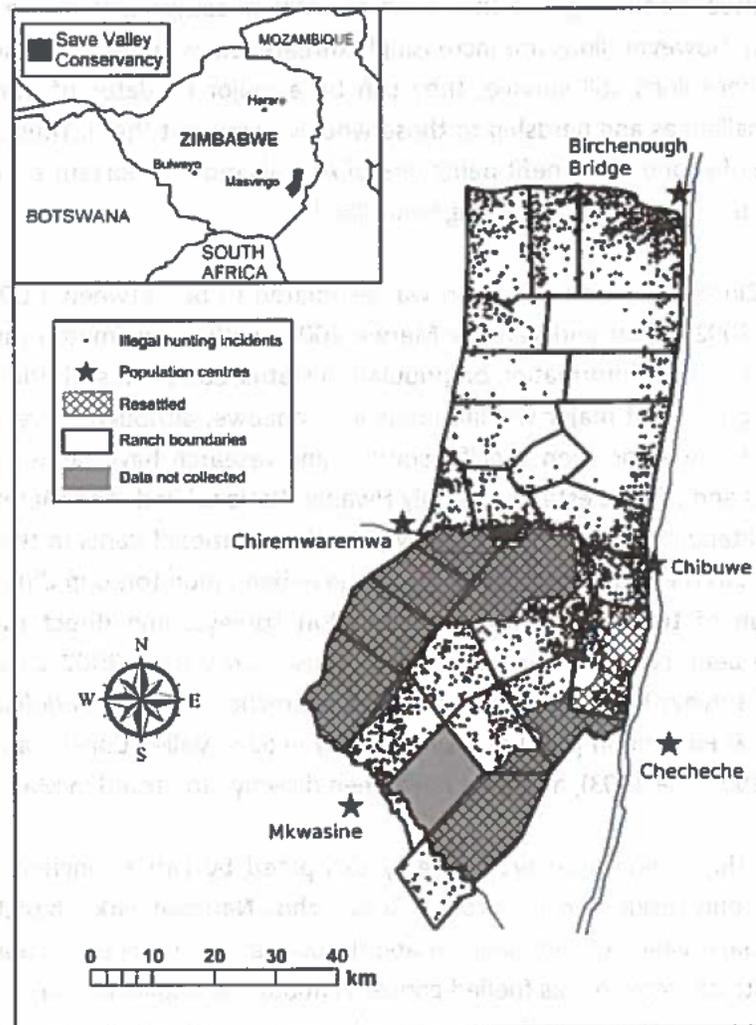


Figure 1. Map of the Savé Valley Conservancy highlighting settled land and the distribution of illegal hunting incidences from 2005 to 2009 (from Lindsey *et al.* 2010)

Prior to the development of the area for cattle ranching in the 1920's, the Savé Valley was one of Zimbabwe's major wildlife refuges (Pole 1999). To facilitate the development of the cattle ranching industry, however, almost all predators and most large herbivores were virtually eradicated. This included wild dogs, lions, cheetahs and spotted hyenas, with leopards managing to exist at reasonable densities (du Toit 1994, Pole 1999). When the conservancy was formed, 3,950 animals of 14 species were reintroduced and a security system was established, including ranch-based anti-poaching teams to control illegal

survey. On 7 May 2007 tracks of two male, three female and two-three cubs were seen at B3-trough (C10) and were named the Makonde pride. By September 2007 it was estimated that the lion population on Sango stood at about 24 lions.”

Track index surveys conducted from 2007 to present indicate that lions in the conservancy are currently undergoing exponential population increase (Figure 2, Groom 2008-2010). It is thus clear that the numbers of lions are increasing rapidly, and may yet double in numbers before reaching equilibrium. Financial assessments suggest that this would not be a viable situation (Funston, Groom & Lindsey *in prep*) and thus some population control mechanisms are desired by the landowners. This could be effectively achieved through trophy hunting, although some consideration may need to be given to the large female segment of the population.

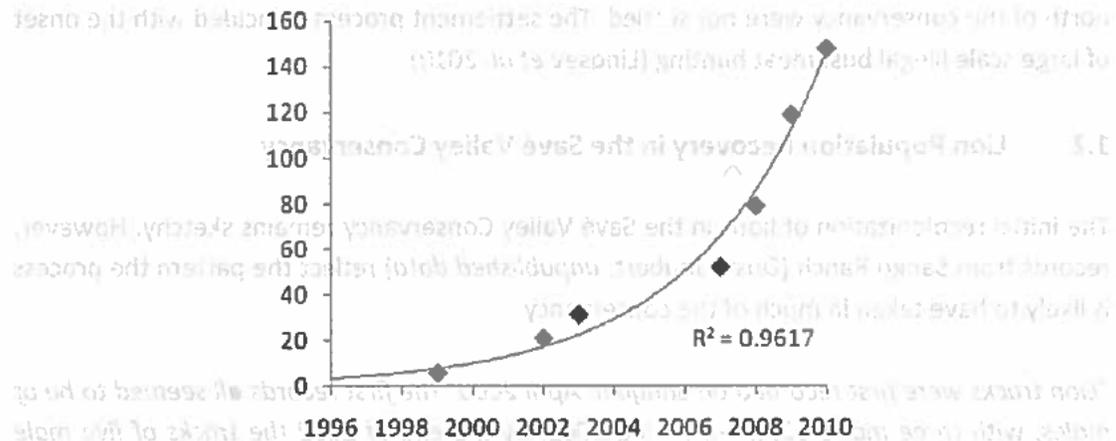


Figure 2. Rate of increase of lions in the Savé Valley Conservancy from 1996 to 2010 as determined by call-in and track index surveys. Average growth rate is 35%^{year}

1.3 Background to Conservation and Modern-Day Trophy Hunting of Lions

Large carnivore species, including lions, are becoming increasingly threatened in Africa, especially when not protected in large conservation areas (Woodroffe & Ginsberg 1998). Fortunately, the popular appeal of charismatic carnivores such as lions has often led to the conservation of habitat that sustains a host of other species. In southern Africa, game reserves and game ranchers recognize the importance of maintaining lion populations and in some game reserves lion populations have been re-established to attract tourists and hunters (Anderson 1981, Mills 1991, Van Dyk 1997, Hunter 1999, Hoare & Williamson 2001, Funston 2008).

Photo-tourism and safari trophy hunting are two industries that have developed to create revenues whilst maintaining wildlife and wild lands. Although these industries differ considerably in their use of wildlife, it is clear that both can help to maintain parks, reserves,

hunting. Wildlife abundance and diversity increased rapidly during the 1990s, as did financial returns from photographic tourism and safari trophy hunting (Lindsey *et al.* 2008). Since the formation of the wildlife conservancy, however, predator numbers have increased, largely through natural recolonization (although 13 lions were reintroduced between 1995 and 2005). Nonetheless, and despite no eradication attempts since 1991, lion and spotted hyaena densities in the conservancy remained low for several years (see Pole 1999), and only began increasing significantly in 2007/2008.

The conservancy's positive development trends were, however, reversed in 2000-2001 with the onset of national land reform in Zimbabwe. Nine properties in the south of the conservancy (comprising 33% of the total land area) were settled by subsistence farmers, and approximately 80 km of 2m twin perimeter game fences was removed. Properties in the north of the conservancy were not settled. The settlement process coincided with the onset of large scale illegal bushmeat hunting (Lindsey *et al.* 2010).

1.2 Lion Population Recovery in the Savé Valley Conservancy

The initial recolonization of lions in the Savé Valley Conservancy remains sketchy. However, records from Sango Ranch (Dusty Joubert, *unpublished data*) reflect the pattern the process is likely to have taken in much of the conservancy:

"Lion tracks were first recorded on Sango in April 2000. The first records all seemed to be of males, with three males observed during 2001. By the end of 2002 the tracks of five male lions were known, but as yet no females had been identified. However tracks of female lions were recorded in the Bedford Block in 2003. In 2003 a male and female lion were recorded on Mokore Ranch. This lioness was reported with cubs on Mokore in 2004. On 18 August 2005, ten lions (4 lionesses, 6 small cubs) were captured at Malilangwe Conservancy and released on Sango Ranch. These lions remained for approximately two weeks in the Chanurwe hill area, and were driven away by a male and female lion that was now moving regularly along the B-line. The newly released lions moved to Chisangaurwe hill where they would hide in the day and hunt in the Savé River area during the night. On 18 November 2005 two of the 10 lions were found dead in snares with a third lion that had broke the snare. This had a devastating effect on the pride with the remaining lions splitting up. It is not clear how many lions survived but it seems from sightings and track records that three adult females and one cub remained. Over the next few years the lions on Sango increased to about 10 individuals by 2007.

In April 2007 a lion monitoring census was conducted throughout in the conservancy. Two methods were used to determine the number of lions in the area. The first being the call-up method with a tape played of a dying buffalo calf, while the second was a track count

wildlife, and the communities around them (Wilkie & Carpenter 1999, Lindsey *et al.* 2006). Although photo-tourism is generally perceived as less invasive, and therefore seems more in line with conservation efforts, hunters spend substantially more money towards their safaris and generate high revenues that can be used to support wildlife conservation (Wilkie & Carpenter 1999, Lindsey *et al.* 2006). Due to political instability safari trophy hunting, and meat sales from shot animals, currently generates most income in the Savé Valley Conservancy, although some landowners have expressed interest in attempting to shift their economic activities towards photo-tourism.

In Africa, safari trophy hunting generally occurs in areas not suitable for other livelihoods, such as farming or photographic tourism, and generates considerable revenue for land that would otherwise be considered of marginal value (Kiss 1990). The wealthy foreign elite have continued to demonstrate “willingness-to-pay” for the opportunity to hunt. If harnessed responsibly, this motivation may prove to be both an economically and biologically sustainable solution for making wildlife pay for itself (Child & Child 1990, Eltringham 1994). However, this “use-it-or-lose-it” philosophy (Baskin 1994, Kock 1995) is not without its critics (for a review see: Lavigne, Callaghan & Smith 1996). Central to the arguments against hunting is the notion that profit-oriented short-term gains go largely to an elite few at the expense of the masses and increase the risk for over-exploitation. Therefore, given that some target species are especially vulnerable to over-exploitation, in large part due to their life histories (e.g. lions), relative demand by trophy hunters, and economic potential, it is critical that they be managed conservatively and responsibly in order to assure their future existence.

As one of the principal attractions for safari hunters, lions are economically important to the hunting industry. However, a high risk of infanticide associated with the removal of resident males, combined with high demand, unsustainable quotas, and an industry plagued by mismanagement, make lions particularly vulnerable to over-exploitation (Whitman 2002, Yamazaki 1996, Loveridge *et al.* 2007, Packer *et al.* 2009, 2011). For these reasons, lions have a high “extinction potential”. This easily sets up a situation of “killing the goose that lays the golden egg” when profit-oriented short-term gains become the driving force behind lion management, rather than sustainable quotas and long-term conservation. Likewise, because harvesting a socially complex species, such as lions, may result in unforeseen cumulative effects, traditional models used for the harvesting of ungulates may be misleading to even the well-intentioned manager, if not at odds with sustainable use (Whitman & Packer 1997, Greene *et al.* 1998).

Currently, only a few scientific studies have examined the extent to which sport hunting affects lion populations (Zambia: Yamazaki, 1996; Tanzania: Creel & Creel 1997, Whitman & Packer 1997, Whitman *et al.* 2004; Zimbabwe: Loveridge *et al.* 2007), and the long-term management implications from an economic or biological perspective have yet to be fully

understood (Whitman 2002). In order to effectively hunt lions within an area, without causing negative impacts on the population, it is imperative to study populations to determine the status of the individuals within the local prides (Whitman & Packer 1997).

Lions tend to be relatively resilient in recovering from population declines, and even catastrophic events, when conditions are good. For example, in the Serengeti National Park, after experiencing a particularly virulent form of canine distemper in 1994-95 that killed approximately 30% of the population, the lion population was fully recovered within a few years (Packer *et al.* 1999). Similar recoveries were recorded in the Kruger National Park after intensive culling programs (Smuts 1976, 1978). However, despite a lion population's ability to recover quickly, local population reductions and extirpations are not uncommon and may result from a combination of a number of factors: illicit game meat hunting, civil unrest, human encroachment, problem animal control, habitat loss, and unsustainable trophy quotas, to name a few. By targeting specific individuals based on their social status, safari hunting could however become a useful management tool to facilitate and maintain population growth and management.

Furthermore lions are also known to affect populations of prey (Mills & Shenk 1992) and smaller carnivore competitors, such as the African wild dog (Mills & Gorman 1997) and cheetah (Kelly & Durant 2000), adding to the uncertain future of several endangered species. Additionally nomads, dispersing subadults and resident lions often become problem animals creating conflicts with farmers and local people.

Large carnivores frequently symbolise Africa's wilderness to the general public who support their relocation or reintroduction. The lion holds a deep emotional appeal to the general public and is the single most sought-after species for tourists visiting reserves. Revenue from increased eco-tourism to South Africa is viewed as a potentially lucrative alternative to either hunting or subsistence and intensive farming practices, which are usually at odds with wildlife. As a result, government and private landowners in South Africa are attempting wildlife reintroduction projects on a scale that is not occurring anywhere else in Africa (Hunter 1999, Funston 2008).

2. Motivation for Trophy Hunting Lions in the Savé Valley Conservancy

To date the main aim of hunting lions in the Savé Valley Conservancy has been to raise revenue. From 2005 to 2009 seventeen lions were hunted (mean = 3.4 lions year⁻¹), yielding gross income of US\$912,900 (US\$182,580 year⁻¹). Currently the conservancy has a lion population of similar density (160 lions = 6.9 lions/100 km²) to similarly vegetated areas in northern Kruger National Park with medium prey density (Ferreira & Funston 2010). However, projections based on prey biomass suggest further increase can be expected. Being surrounded by communal settlement areas the conservancy is a net source for lions in

viability of this population, and its resilience to limited sport hunting of adult males. However, a limited off take of adult lionesses (<3%) should be sustainable (Van Vuuren *et al.* 2005).

Although adult females are crucial members of the population, consideration should also be given to the effect that mortality of pride males might have on the survival of age-classes that are vulnerable to intra-specific competition or conflict, namely dependent cubs that are susceptible to infanticide. The most important shortcoming of most models thus far is that they are unable to monitor or detect socio-ecological changes in the population (Van Vuuren *et al.* 2005), which may be of particular importance if lion persecution were to cause changes in social behaviour (Yamazaki 1996, Whitman & Packer 1997). This has largely been overcome in a model published by Whitman *et al.* (2004), which shows that although infanticide increases the risk of population extinction, trophy hunting could be sustained simply by hunting males above a minimum age threshold, and this strategy maximizes both the quantity and quality in the long-term. Whitman *et al.* (2004) conclude that any males ≥ 6 years of age can be safely hunted without negative effects on the population. This figure, however, is being widely debated as being too young, and may represent the market forces in the country (Tanzania) where the research was conducted.

The mechanism by which the loss of mature males is thought to influence the population is that it may result in an increased rate of young cubs succumbing due to the pride being irregularly guarded by the fathers (Loveridge *et al.* 2007) or infanticide when new adult males become the pride owners (Schaller 1972, Packer *et al.* 1988), ultimately having a detrimental effect on the growth of the population (Starfield *et al.* 1981, Whitman & Packer 1997). Thus the role of the territorial males in defending their territories against other challenging males, and the protection they afford their offspring, should not be dismissed. While it is possible as suggested by Whitman *et al.* (2004) that younger males can impregnate lioness, the experience and maturity of adult males may be very important for successful rearing of cubs.

In areas depopulated of mature males the remaining mature males cover very large areas incorporating several prides (Yamazaki 1996, Loveridge *et al.* 2007). This obviously reduces their ability to effectively defend their prides ranges, and results in average pride size, as measured by the number of lionesses, declining to ≤ 3 , as well as cub survival declining to low levels (Loveridge *et al.* 2007). Packer *et al.* (1988) showed that prides of 3-10 adult lionesses have a higher individual fitness than smaller or larger prides, and thus prides reduced to <3 adult females have lower probability of persisting.

Adult males in the Selous Game Reserve, Tanzania, were shown to be able to sustain sport hunting that removed between 2.7 and 4.3 percent of the population annually (Creel & Creel 1997), while the removal of 10 to 16 percent is suggested to be unsustainable in the

the area, and is no longer a sink for dispersing lions from other areas. Therefore, the population needs to be managed as a distinct population, largely isolated from other populations, but still with the possibility of genetic material coming in from other areas. As a source area, with dispersal of animals to surrounding areas, trophy hunting may be an appropriate management tool to reduce conflict with adjoining land users by targeting specific males before dispersal and possibly small prides in high conflict areas (Venter & Hopkins 1988). In fenced reserves in South Africa intensive removals of dispersing lions are routinely done to reduce the risk of lions breaking out into communal areas (Van Dyk 1997) and to control population growth (Kettles & Slotow 2009).

3. The Potential of Safari Hunting to Impact Lion Populations

Literary sources indicate that excessive safari hunting of lions has the potential to negatively affect lion populations (Yamazaki 1996, Whitman 2002, Loveridge *et al.* 2007, Groom & Funston in prep), especially when lion quotas are large in relation to population size and animals taken from the population are in the early part of their reproductive prime. It is, however, very important that this impact is measured appropriately, and that the results of various data analyses are carefully interpreted. For example, professional hunters throughout Africa generally suggest that “suitable” trophy males appear to be declining in many areas over the last few decades, which may in many cases be true (Yamazaki 1996, Loveridge *et al.* 2007), and may serve as an index of a negative trend within the population. However, it would also seem that immature males are often easier to find because they readily scavenge from baits and are often less wary than older males, thus making them more vulnerable to hunters (Whitman 2002). This could thus in part account for the higher proportion of substandard trophies exported from Africa each year.

The sex and age of the lions hunted is thus important when assessing sustainability. The importance of adult survival for population growth has been reported for numerous moderate- to long-lived (*k*-selected) animal species (Wu & Botkin 1980, Crouse *et al.* 1987, Caswell 1989, Crooks *et al.* 1997). Since adult survival acts upon individuals with the highest reproductive value repeatedly, changes in this demographic rate are likely to strongly affect population growth. Van Vuuren, Herrmann and Funston (2005) using a deterministic spreadsheet model, found that adult female survival is the most important factor influencing population growth, and that human-livestock-conflict accounted for significant numbers of adult lionesses being shot each year in areas adjacent to the Kgalagadi Transfrontier Park. Loveridge *et al.* (2007) showed that persistence of boundary prides in Hwange National Park is negatively affected both by excessive adult mortality through hunting, as well as adult female mortality through sport hunting and human-livestock-conflict. It would thus seem that the frequency of adult lioness mortality a particular lion population is exposed too might be decisive in forecasting its long-term viability. Until recently lionesses were not hunted in the conservancy and as such this strongly increase the

long-term (Starfield *et al.* 1981, Venter & Hopkins 1988) in a closed population. In Zimbabwe a quota of 8% of the male population (Martin & Thomas 1991) has been shown to be difficult to sustain (Loveridge *et al.* 2007), although it is debatable whether the starting populations were accurately estimated. Thus it appears that adult males are more resilient to trophy hunting than are adult females, and that off takes of about 5-10 % per year of the adult males in the population are probably sustainable provided that the individual lions are selected carefully (Starfield *et al.* 1981, Venter & Hopkins 1988, Whitman *et al.* 2004).

The challenge that management is thus confronted with is to reliably estimate population size and structure and set a sustainable off take. This is, however, more complex in a reserve such as the SVC, which also supports a sizeable ecotourism sector incorporating safari lodges and photo-tourism vehicle safaris, for which reliable and satisfactory sightings of species such as lions are paramount.

4. Lion Survey Techniques to Determine Quotas

Conventional census techniques are inappropriate for estimating numbers of nocturnal, low-density carnivore species such as lions. The difficulties include that due to their cryptic shy nature, and because many lion areas are wooded further reducing visibility (Norton-Griffiths 1978), which makes aerial censusing inappropriate for lions. Furthermore in areas where lions are intensively hunted they are more likely to be shy, affecting most censusing techniques (Whitman 2002, Funston & Janse van Rensburg 2003). The best method to obtain a reliable population count and demographic assessment of a lion population is via a direct count, whereby each individual in the population is identified and counted. Packer *et al.* (1999) clearly demonstrates the benefits of using individual identification in terms of tracking population fluctuations in the Serengeti over 30 years. However, direct counts are generally not only prohibitively expensive and time consuming, but are also potentially impractical for anything but small areas.

Once direct counts have been discounted for surveying the size of a specific lion population can be effectively determined through total counts using a baited call-up station methodology, as developed by Smuts *et al.* (1977). Mills, Juritz & Zucchini (2001) developed a calling station method (limited time without bait) for censusing spotted hyaena (*Crocuta crocuta*), which has been adapted for censusing lions (Ogutu & Dublin 1998, Ferreira & Funston 2010). Call-ups surveys are generally conducted by broadcasting hyena vocalizations at a kill and/or wildebeest or buffalo distress calls across loudspeakers, and are useful at estimating lion numbers (Mills, 1985; Creel & Creel, 1997; Ogutu & Dublin, 1998, Ferreira & Funston 2010). Calling stations rely on a single, independent experiment to estimate the probability of the response to sounds, which might be different for different regions (Loveridge *et al.* 2001). Thus, call-ups have not yet been clearly shown to be effective for censusing lion populations in all situations, and may be biased by lion response

probabilities being variable as well as by poor experimental design or incorrect analysis. Response to call-ups seems to be particularly low in low-density (Funston 2001) and trophy hunted lion populations (Whitman 2002, Funston & Janse van Rensburg 2003). Furthermore, the effective luring range for predators varies considerably with regards to the vegetation density, topography as well as the season. Smuts *et al.* (1977) suggested that the dry season is definitely the best time of the year to carry out surveys.

There have been recent advances in using track frequency as an index to estimate lion density (Stander 1998, Funston & Ferreira 2010). The Savé Valley Conservancy is a good site for this monitoring technique as it largely has suitable road substrate, available tracking skills, and the possibility of accurate direct counts. As will be presented below it is likely that the combined knowledge of safari guides and landowners could be effectively collated to determine annual estimates of the lion population size and structure within the conservancy.

Given the difficulties generally encountered when trying to estimate lion abundance in a particular area, it is not surprising to find that lion quotas for hunting concessions in Africa are in most cases based on little more than educated guesses (Severre 1995). Thus, as most hunting areas do not have a reliable count of lions, recommending a number based upon a certain percentage for sustainable harvest is inherently problematic in most areas. Lion hunting is thus generally adaptively managed in the sense that off take is generally a reflection of what hunters were able to find in the previous year. In contrast, with good monitoring it should be possible to set lion hunting quotas in the conservancy more carefully based on good estimates of population size and structure. Adaptive management is an accepted technique in resource management (Holling 1978, Walters 1986), and should be the guiding principle in the conservancy to set annual quotas.

However, in practice sound guidelines and adaptive approaches are often flawed in a few important ways specific to the lion hunting industry. This is because standards in trophy quality are often not maintained, quotas are often set beyond sustainable limits, and lions are often then lured out of national parks into adjacent hunting areas. The problems encountered in the lion hunting industry are primarily because much profit is to be made by shooting lions, and government issued policies and quotas are not always conducive to long-term management, nor are government employees beyond corruption whether it be at the lowest or highest level (Overton, 1998). Thus, unless the professional hunter adheres to a higher standard in selecting trophies and companies follow suit by insisting upon (if not suggesting) sustainable quotas, the profit-based quota system as it stands now is not sustainable in the long-term for most countries.

It is, however, clear that the Savé Valley Conservancy collectively desires to conduct safari hunting in a responsible and conservative manner and will police unethical behaviour. This is

important both in terms of sustainability, and to ensure minimum disruption of the photo-tourism potential within the reserve.

5. Population Dynamics and Regulating Lion Population Growth

Although lion populations in African savannas are generally declining, there are several examples in southern Africa where lions have been reintroduced to private land and due to the protection afforded are increasing in numbers (Funston 2008). Although increases are typically a desired management outcome inevitably most reserves reach a point when management decides that there are now sufficient lions to meet the reserves objectives and thus population control measures need to be instituted (Kettles and Slotow 2009; Slotow & Hunter 2009). Population control of lions does, however, often create a management dilemma as it is not always clear what approach will work best given the specific set of circumstances and budgetary constraints. In order of seeming preference, the measures typically employed to control lion populations include translocation of subadults to new reserves, contraception of breeding lionesses, culling (including trophy hunting) and social manipulation (Kettles & Slotow 2009).

All of these management options require a degree of population monitoring, which is often more costly than the management intervention. Although excess subadult, and even adult, lions could be removed from the Savé Valley Conservancy, it is not clear that there are any immediate destinations that would be suitable for these animals. Thus although a useful approach, translocation is not likely to remove sufficient lions to be considered as the key approach for the conservancy. Contraception can be successfully applied in small reserves where resources, habitat and lion behaviour allow intensive monitoring and manipulation of breeding rates. However, currently in the conservancy the degree of lion monitoring precludes contraception being considered as the main approach to population regulation. Lions are just too shy in the conservancy and not well enough understood to effectively apply contraception. However, this could change with time if more resources are invested in monitoring, and particularly if trophy hunting pressures were eased in areas of the conservancy wanting to focus on photo tourism.

As the numbers of lions in many southern African reserves have reached saturation, generally most reserves are currently faced with the need to cull lions (Kettles & Slotow 2009). Typically this is achieved through the shooting of excess independent subadults, adult male coalitions, and occasionally lionesses from prides. The latter option is problematic mainly in that it induces fear in the lions and thus affects game viewing opportunities. Few reserves are large enough to allow natural population regulation mechanisms to be applied or simulated. However, population control methods that largely simulate natural processes are likely to produce the most desirable outcome, with the

minimum intervention, and thus minimum social disruption. The Savé Valley Conservancy is, however, large enough to allow simulated approaches.

Social disruption *per se* is a fourth population management approach that can be applied but is generally avoided because of how it may affect the tourism value of lions in many reserves. Thus although all feasible approaches to lion population control should be investigated, currently culling as a trophy hunting exercise is the most suitable option for the conservancy. Thus the lion population in the conservancy is large enough that a culling approach whereby lions of the appropriate sex and age are trophy hunted may be sufficient to induce population stability without having to resort to a more generalised culling approach.

To date the aim for trophy hunting lions in the conservancy to date has been economic, with population management recently having become an additional objective. The challenge for conservancy management is to reliably set an off take or quota that meets the economic expectations and effectively limits lion population growth. The basis of this plan draws on research findings that indicate that lion populations are more resilient to trophy hunting when only adult male lions are hunted. However, it is possible that stabilizing lion population growth when they have not reached carrying capacity may not be achieved through sustainable use models based on only hunting mature males. Thus it is likely that female lions will have to comprise a proportion of the quota to effectively limit population growth.

The various estimates suggest that currently there are about 170 lions in the conservancy (Appendix 1). An older male biased trophy hunting system, with limited hunting of adult lionesses in certain contexts should stabilize population growth. To be successfully implemented, however, trophy age needs to be carefully monitored, and accurate hunting records kept. The aging criteria and required hunt records are outlined in Appendix 2. As it is the stated goal of conservancy members to hunt lions for profit, and as the threshold lion population that will not induce financial cost is relatively low (Appendix 3), various trophy hunting options to regulate lion population growth are proposed here. The strategies that are suggested are outlined below and discussed in detail in the following four sections:

5.1 Hunting male lions at an age threshold that will stabilize population growth

Whitman *et al.* (2004) showed that although infanticide increases the risk of population extinction, trophy hunting could be sustained simply by hunting males above a minimum age threshold, and this strategy maximizes both the quantity and the quality of the long-term kill. Whitman *et al.* (2004) conclude that any males ≥ 6 years of age can be safely hunted without negative effects on the population. Thus logically if one wanted to reduce a lion population one might hunt males below this age threshold, whereas stability should be

achieved hunting at the age-threshold (see Figure 3). This is proposed as the key lion management tool to be employed in the conservancy.

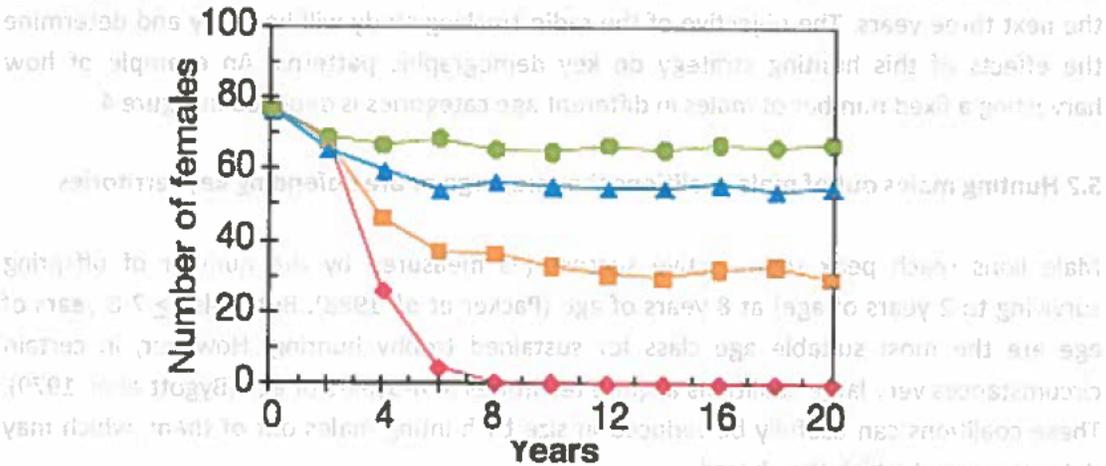


Figure 3. The effects of trophy hunting on the number of adult females after 20 years, as a function of quota size and male age. Average outcome after 100 runs is shown from shooting males of the following ages: ≥ 3 yr old (red), ≥ 4 yr (orange), ≥ 5 yr (blue), ≥ 6 yr (green)(from Whitman *et al.* 2004).

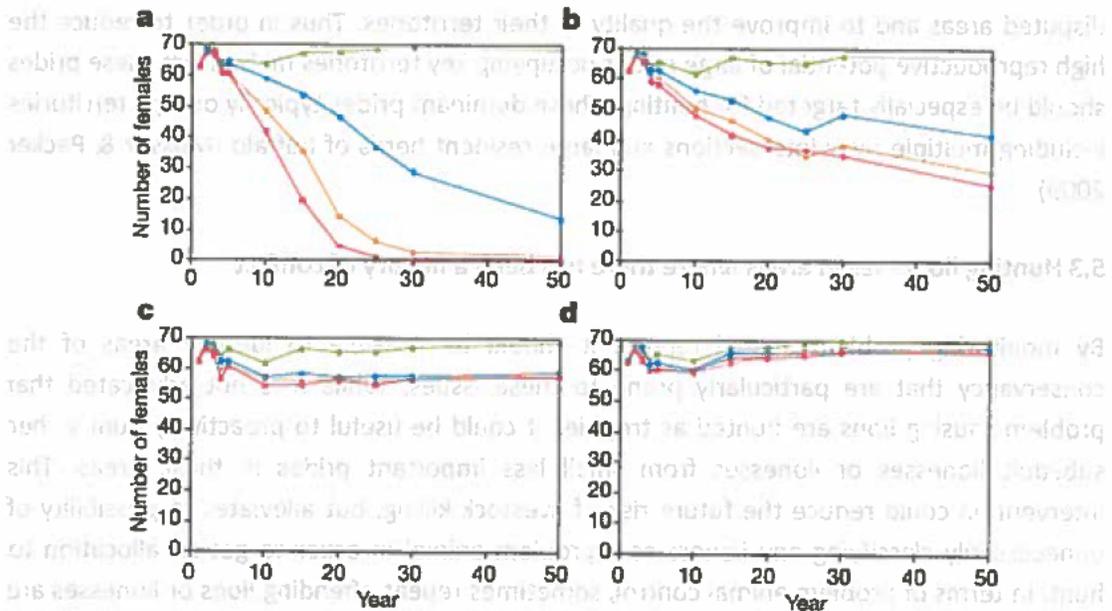


Figure 4. The effect of quota size and male age on female population size through time as a function the age at which males are hunted. Red indicates average outcome over 100 runs from annual quota of 10 males, orange from quota of 6 males, blue from quota of 4, and green from quota of 2. a–d, Female population size when hunters shoot males that are ≥ 3 yr old (red), ≥ 4 yr (orange), ≥ 5 yr (blue), ≥ 6 yr (green)(from Whitman *et al.* 2004).

For the seasons 2012-2014 it is proposed that all male lions of five years or older are placed on quota. The outcome of this should be monitored by annual spoor surveys, a second conservancy-wide lion census in 2015, and a radio-tracking based monitoring program for the next three years. The objective of the radio-tracking study will be to try and determine the effects of this hunting strategy on key demographic patterns. An example of how harvesting a fixed number of males in different age categories is depicted in Figure 4.

5.2 Hunting males out of male coalitions that are large or are defending key territories

Male lions reach peak reproductive success (as measured by the number of offspring surviving to 2 years of age) at 8 years of age (Packer *et al.* 1988). But males ≥ 7 -8 years of age are the most suitable age class for sustained trophy hunting. However, in certain circumstances very large coalitions acquire territories at 4-5 years of age (Bygott *et al.* 1979). These coalitions can usefully be reduced in size by hunting males out of them, which may delay the age at which they breed.

Mosser and Packer (2009) found that territorial competition directly affected critical components of female fitness, and that larger prides gained and maintained access to the highest-quality habitat. Neighbours had a significant negative effect on female reproductive success and survival, and larger prides were significantly more likely to maintain control of disputed areas and to improve the quality of their territories. Thus in order to reduce the high reproductive potential of large prides occupying key territories males from these prides should be especially targeted for hunting. These dominant prides typically occupy territories including multiple river intersections and large resident herds of buffalo (Mosser & Packer 2009).

5.3 Hunting lionesses in areas where there has been a history of conflict

By monitoring problem animal reports it should be possible to identify areas of the conservancy that are particularly prone to these issues. While it is not advocated that problem causing lions are hunted as trophies it could be useful to proactively hunt either subadult lionesses or lionesses from small less important prides in these areas. This intervention could reduce the future risk of livestock killing, but alleviates to possibility of unnecessarily classifying any lioness as a problem animal in order to get an allocation to hunt. In terms of problem animal control, sometimes repeat offending lions or lionesses are best shot to resolve conflict problems (Stander 1998). For the reasons given, however, it is not suggested that these problem animals are trophy hunted. They should preferably be destroyed by conservancy members in collaboration with conservancy management. See section on problem animal control for more details.

5.4 Hunting older females from key prides to stabilize population growth

Although it has been reported generally that hunting lionesses can lead to population declines (Whitman *et al.* 2004, Van Vuuren *et al.* 2004), there are natural scenarios that induce adult female mortality that could be simulated to control lion population growth in the conservancy. Lionesses in large dominant prides sometime kill lionesses from neighbouring prides in territorial fights (Mosser & Packer 2009). But in a population below carrying capacity one might expect fewer territorial fights. Thus one might simulate the 'predatory effect' of neighbours and if females are to be hunted select females from less important prides keeping the nucleus of the dominant prides intact, especially if that meets emerging photo-tourism objectives.

6. Offtake Strategies and Final Recommendations

It is recommended that the off take strategy for lions in the Savé Valley Conservancy should be supported by the following activities:

1. Lion populations should be monitored via track frequency, manager's estimates and for the next three years via radio-tracking and direct counts compiled during an annual workshop to help set the following year's quota.
2. Long-term records of quotas, number of licenses issued, and off take should be maintained and reported on an annual report.
3. Measurements of lion skull size as well as body size should be recorded according to the guidelines specified in Appendix 2 of this plan for all lion shot, and where possible the individual should be identified by reserve management to assure all involved that an appropriate lion was shot.
4. Trophy age should be assessed by a combination of tooth development and wear, nose pigmentation, mane development, etc (see Appendix 2).
5. Hunters should record locations as accurately as possible of all lion shot using a GPS with records going to a central database to monitor intensity of use of certain areas.
6. The professional hunters should adhere to high ethical standards in terms of what is fair chase and in trophy selection.
7. Safaris should not be marketed to clients as "sure things," to relieve professional guides somewhat from pressure at having to deliver a lion, regardless of quality.

7. Response to stock raiding lions (and other predators)

In the Savé Valley Conservancy area there are four main constituencies involved in issues to do with problems of livestock depredation by lions (and large predators). These include:

1. Land owners/managers of private ranches in the conservancy
2. Settled communities within the conservancy
3. Neighbouring communities outside the conservancy, and
4. Zimbabwe National Parks and Wildlife Authority

When incidences of live-stock depredation occur these constituencies have different roles to play in addressing the problem. Ideally these roles, and the procedures to be followed, should be decided as part of a consultative workshop process, which is recommended as a next step. The recommendations presented here are synthesised from other published sources (Funston 2001). The keys to minimising conflict include primarily mitigating or preventing livestock depredation from occurring in the first place, and good communication and effective resolution of problems when they do arise.

7.1 Mitigating (preventing) livestock depredation

Much has been written in the literature about conflict between man, predators and livestock and this remains a highly contentious issue. Clearly findings to date indicate that the best way to minimise the development of conflict situations is through the appropriate livestock husbandry or management practices. Essentially the parties should attempt to minimise the contact between predators and livestock, and have measures in place to warn of the presence of predators in the vicinity of livestock. Once the predators have been detected they can often be chased off without incidence. Accompanying this management plan is a Human-Lion Conflict Toolkit document with all the practical steps that should be implemented to minimise conflict (see page 3 of the toolkit). This toolkit should be made available to all landowners, and representatives of all villages of both settled and neighbouring communities.

Where possible it would be in the long-term interests of landowners within the conservancy to engage, particularly with settled communities, to help them implement the recommendations of the Human-Lion Conflict Toolkit. In summary conflict can largely be mitigated by the following fairly simple husbandry techniques:

- a. All grazing livestock should be accompanied by a herder and at least two dogs and donkeys that are wary of lions (and other predators)
- b. All livestock should be kraaled at night in lion proof bomas (at least 6 foot high and non-see-through) with at least two herders (owners) and two dogs in attendance.

If these fairly simple measures are in place relatively few conflict situations will arise. The appropriate materials for boma construction vary from site to site, but in the conservancy there should be no shortage of mopane trees for stout pole boma constructions, augmented by old fencing materials (see page 7, 10 and 21 of the toolkit). One of the key weak points in bomas is the gates. Corrugated iron, or flattened oil/diesel drums, can be fashioned into useful and effective gates. Dogs are key to the success of most mitigation measures (see page 16 and 17 of the toolkit), but must be vaccinated to avoid disease transmission. Conservancy members should lobby the authorities in the area for comprehensive vaccination of all dogs.

It is also important to reach out to the communities to assist in educating about predators and how to live with them, and for creating awareness and better attitudes generally (see pages 26 to 31 of the toolkit). Existing outreach programs by various conservancy constituencies should be supported by conservancy members and by a conservancy conservation fund.

7.2 Response to livestock depredation events

7.2.1 Settled and Neighbouring communities

- a. Promptly report livestock depredation events to the landowner with title deed for that area, the conservator, and ideally the Zimbabwe National Parks and Wildlife Authority. Report accurately the characteristics of the offending large predators or incident so that all have a better idea of what to expect when planning how to respond. This should include descriptions of a) location b) time of day c) was the livestock animal in a kraal at the time d) what are the specifications of that kraal e) has this happened before recently in this area.
- b. Settled communities should invest in the necessary communication technology to effectively and timeously report any incidents.

7.2.2 Landowners with title deeds and conservator

- a. Respond promptly to reports of offending large predators and livestock predation incidences.
- b. Visit the site where the incident occurred and assess the severity of the situation. Just having someone come and investigate can largely reduce tensions.
- c. Consult with livestock owners about their livestock management and if possible offer assistance or advice on how to improve their animal husbandry to minimise conflict. The Human-Lion Conflict Toolkit (see Appendix 2) should be consulted to facilitate solving the problem and advising the most appropriate mitigation measures.
- d. In the event of repeat problems in that area, and failing of implementing mitigation measures the best option may be to remove or destroy the offending predators. The actions need to be very focused with the specific offending animals targeted. From 2011

to 2015 there will be a lion conservation and management project running in the conservancy and in Gonarezhou National Park. The park has relatively few lions at present.

- e. These suggestions are preliminary and need further deliberation through a workshop before being implemented.
- f. Different response guidelines for 'occasional' and 'habitual stock raiders' should be followed.

7.2.3 Stock raider classification

a. Occasional stock raiders (first or one incidence reported)

- Attempt the recommended mitigation measures to determine whether this resolves the problem

b. Habitual stock raiders/problem animals (two or more incidences reported)

- Decide whether to translocate or destroy. For example if a lion eats 10 cows over the course of three weeks because those cows are left wandering around the conservancy at night without any protection, that lion is simply an opportunist, not a problem. If however, a lion takes only 3 cows (3 different incidences) out of a well constructed boma, where there are people and dogs sleeping nearby, it is possibly a genuine problem animal. Once there is evidence that livestock was being properly looked after at the time the incident occurred, mitigation measures may be taken.

7.2.4 Record keeping of incidents and co-operation

- a. Community, conservancy and park management staff need to improve their record keeping systems to yield more information about offending animals, e.g. sex, age, status, etc., and communicate this in an annual report to all constituencies.
- b. Hold an annual farmers meeting to discuss problems and report back on recent incidents.

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Appendix 1: Savé Valley Conservancy Lion Population Survey 2011

Introduction

To augment lion monitoring efforts conducted thus far in the conservancy a baited call-up lion survey was conducted from June 20 to July 10, 2011. This short report is thus largely intended for immediate decision making of lion quotas for 2012-2014. The lion survey was largely designed to determine whether the population increases estimated from spoor counts (Groom 2008-2010; Figure 1), and reported by landowners, were supported by an alternative survey technique. Such a survey would also provide information on the population's age and sex structure which spoor counts cannot do. The average growth rate of the SVC lion population from 1999 to 2010, as estimated largely by spoor counts, was calculated at 35% per year. Such high growth rates have been recorded in re-introduced lion populations elsewhere (Funston 2008), but we wanted to verify if such a high population and growth rate was indeed characteristic of the SVC lion population.

Methods

The survey method used was baited call-up stations as described by Smuts, Whyte & Dearlove (1977), with a modification to the method in the use of camera traps to photograph shy or elusive lions. We used a density of 13 call-up stations per 1,000 km², to ensure that we sampled an area of 1886 km² assuming a response radius of 5 km (Smuts et al. 1977). A total of 25 stations were surveyed (Figure 5). We attempted to space all stations about 10 km apart from each other, but various logistic constraints precluded an ideal distribution of calling sites in some areas. Notably we would like to survey one or two additional sites on Sango. We were also not granted permission to survey the Msaize and Mapari ranches, and thus positioned calling stations close to their boundaries. For Savuli we had comprehensive camera trap records that further surveying was not necessary in that area. As the stations were placed on the conservancy in a series of concentric 5km radii we assumed this design would achieve as close as possible to a total count, realizing though that the response probability of the lions was not known.

Unlike the non-baited call-up station technique of Ferreira & Funston (2010), the baited call-up design of Smuts et al. (1977) was not calibrated to determine response radius and response probability. However, surveys using this technique in Kruger National Park have consistently revealed close to comprehensive total counts. As we conducted the call-ups for five to six hours, instead of the recommended all night (Smuts et al. 1977), we analyzed our data both with a total count tally, as well as with the relationship defined by Ferreira & Funston (2010) for calling stations to get an idea of how both compared with annual spoor counts (Groom 2008-2010), and with land-owner estimates. A few weeks before the survey

the land owners/managers were asked to collate as much information as possible on the status of lions on their farms. This information was collected in the form of maps where the size, composition, and approximate area of activity of each known lion group were noted. Camera traps placed for hunting purposes greatly facilitated this process.

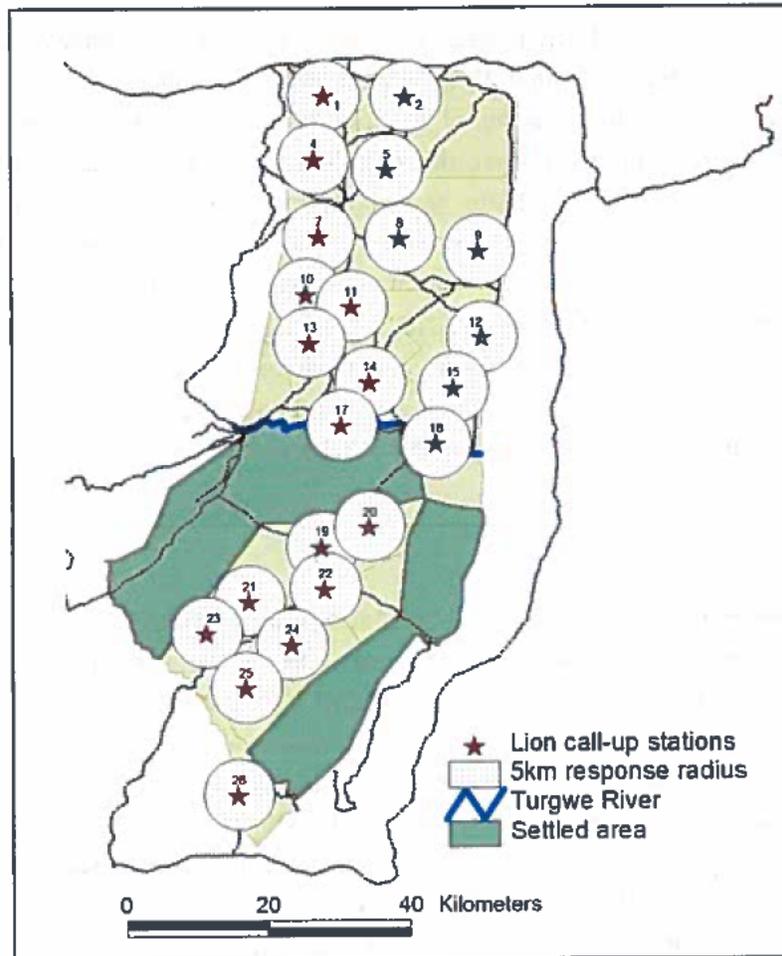


Figure 1. Map of the Savé Valley Conservancy indicating settled area and the planned position of calling stations for the 2011 lion survey

For the survey we used bait in the form of either whole or halved wildebeest and zebra carcasses, and in some cases legs of elephant from culled animals. The gut contents of carcasses were kept and dragged along roads for about 1-3 km in the vicinity of capture stations. Once the drags were completed the carcasses were tied to the base of a stout tree, and branches packed behind the bait to ensure that the lions would feed on the right side of the carcass for identification photographs to be taken, and to permit darting. Camera traps were placed at about 45° relative to the vehicle bait axis on either side 6-10 m from the carcass. At most stations two cameras were used. Just after sunset the sounds of a buffalo calf in distress, and hyaenas and lions feeding, were broadcast in thirty to sixty minute

intervals with sporadic quiet periods interspersed in between. We used an iPod connected to a 12 volt, 60 watt amplifier, connected to two 4-ohm horn speakers, each with a 40 watt driver unit. The speakers were connected in series and placed c. 2.5m above the ground either on the roof of the vehicle, a steel tripod, or suitable tree, facing 180° direction from each other. The vocalisations were broadcast at full volume, with speakers rotated 180° every 30 minutes to get an all-round sound distribution.

At least two observers sat in the back of the vehicle. When any animal was heard approaching, a torch and/or a red-filtered spotlight were used to identify the animal or group of animals. Parameters recorded included species, number of individuals, group composition (age and sex) and time of arrival at the station. Once all lions in the group had arrived, and were accounted for we darted an adult lioness from each pride encountered, and a sample of males above three years of age, for the fitting of Sirtrack VHF radio-collars.

Results and Discussion

A total of 25 stations were sampled over 14 nights. A total of 44 lions were recorded at the stations (Table 1). During the survey ten lions were immobilized of which eight were large enough to be fitted with radio-collars. These included four male and four female lions (Table 2). An additional five radio-collars are still available to be deployed.

Table 1. The sex and age composition and numbers of lions recorded at calling station during the SVC 2011 lion survey

Station	Time	Number	Group composition
5	20:38	2	2 adult females
7	18:20	4	2 adult males (c. 4-5 years) and 2 adult females (c. 7-8 years)
10	20:05	5	1 adult female, 2 large cubs (c 18 months old), 2 young cubs
11	18:00	2	2 subadult males
13	22:00	1	1 adult female (possibly lactating)
14	23:20	2	1 adult male, 1 adult female
18	18:42	2	2 subadult males (3-4 years)
19	17:55	3	3 large male cubs (c. 18 months)
19	21:50	2	2 subadult males(3-4 years)
19	23:00	4	4 subadult females (2-3 years)
20	18:20	4	2 subadult males, 2 subadult females
21	23:42	1	1 subadult male
22	23:20	5	2 subadult males, 3 females
23	20:30	2	2 adult females
23	22:40	2	2 subadult males
26	18:05	3	2 adult females, 1 adult male
	Total	44	

Table 2. Details of lions collared during the SVC 2011 lion survey

Station	Ranch	Collared animal	Collar Frequency
7	Sango/Chishakwe	Adult female (c. 7-8 years)	149.3990
	Boundary (Vuma hills)	Adult male (c. 4-5 years)	149.0700
11	Sango - Central	Subadult male (c. 3-4 years)	149.2210
19	Humani - near Mbizi dip	Subadult male (c. 3-4 years)	149.0600
20	Humani - Zambara area	Subadult female (c. 3-4 years)	149.3200
23	Hammond - Near	Adult female (c. 4-5 years)	149.4200
	Mopane Pan	Subadult male (c. 3-4 years)	149.2390
26	Impala - central	Adult female (c. 3-4 years)	149.4400

The current lion population estimate for SVC (Table 3) is synthesised from several approaches including an estimate based on the 2010 spoor estimate compounded by the average growth rate from 2007 to 2010 (Groom 2008-2010) to give a 2011 estimate, an estimate of the lion population based on extrapolation of the call up survey, the application of the calling station equation (Ferreira & Funston 2010), and the sum of the managers estimates. A synthesised view from all of these is that there are probably about 160-170 lions in the non-settled areas of the SVC at present. The available data does not allow any better estimate but it is encouraging that the spoor, calling station and managers estimates are all very much in line with each other.

Table 3. Estimates of the lion abundance in the SVC as determined by the 2011 lion survey

Survey method used	SVC lion population estimate
Spoor estimate from 2010	148
Call-up estimate	168 (95% confidence limits: 128-207)
Managers estimate	162

The sex and age composition of the 44 lions recorded during the survey are presented in Table 4. During the survey adults comprised 41% (n = 18) of the lions observed, subadults 43 % (n = 19), and cubs 16% (n = 7). These are similar ratios of adults to other studies, but the subadult segment of the population comprised a higher percentage than is typically found. Thus fewer cubs were recorded than is typical. Either lionesses were not willing to bring their young cubs to calling stations or at present the SVC lion population is dominated by young adults and a high proportion of subadults. The latter explanation seems most likely as the lion population only really started increasing dramatically in 2007. Thus it would be expected that as this 'young' lion population matures a subsequent pulse of reproduction is

expected. This is largely supported by the manager's estimates which recorded a slightly higher cub percentage, but nevertheless lower than typical lion populations.

Table 4. The sex and age ratios of lions in the Savé Valley Conservancy from to 2011 lion survey and managers estimates

Sex / Age classes		Total count	Managers estimate
Adults	Adult females (>4 years)	14	62
	Mature adult males (>6 years)	0 41%	2 50%
	Young adult males (4-6 years)	4	17
Subadults	Subadult females (2-4 years)	6	3
	Subadult males (2-4 years)	13 43%	19 28%
	Subadults unknown	0	8
Cubs	Cubs	7 16%	36 22%
Total		44	162

Both estimates (total count and managers estimates) sex and age proportions indicate that the SVC lion population has a relatively high number (and proportion) of adult females, very few mature (>6 year) and young adult (4-6 years) males, and a high proportion of subadult (3-4 years) males, with relatively few cubs. Adult lionesses also outnumber adult males by a ratio of 1:3.3 to 1:3.5. This is a relatively high ratio typical of hunted populations where adult males are removed by hunting.

Recommendations

It is clear that a high number (and proportion) of the SVC lion population are sub-adult males suggesting that many of them will mature into the adult age class in the next few years. However, the relatively distorted adult sex ratio indicates that trophy hunting is removing almost all the mature (>6 years) males in the population. During the survey the oldest male lion we observed was only 4-5 years of age and none were suitable trophies. From the managers estimates we only got reports of two mature adult males, with 17 young adult (4-6 years) males being reported. This is further evidence of the fact that trophy hunting in SVC is effectively removing the mature adult male age class from the population.

The lack of mature males does not seem to be problematic in terms of reproduction, as there are relatively high numbers of cubs, and particularly subadults, in the population. The lack of mature males may, however, be problematic for SVC in terms of hunter satisfaction as clients are unlikely to be consistently satisfied with only hunting young males that do not have heavy manes.

As the landowners generally seem to feel that there are either enough, or in many cases too many lions, the method to halt population growth will of necessity have to include the shooting of either adult or subadult lionesses. This is unfortunately unavoidable when the objective is to halt population growth and a population is not at carrying capacity. This is generally accepted practice when the stated objectives of a wildlife production system dictate that a large carnivore population is too abundant (Packer et al. 2009). Managed hunting of lions will also need to consider illegal killing of problem animals especially by poisoning, but also by shooting.

Thus when setting annual quotas SVC managers need to balance economic returns from good quality trophies, remove the appropriate number of lionesses, and factor in illegal killing, to result in population stability and halt population growth. It may thus be wise to market three types of lion hunts in SVC, which could include a limited number of high quality older male trophies, a larger segment of young relatively poorer quality trophies, and a similar number of lioness trophies. The lionesses should ideally be as young as is acceptable for a trophy, and of an animal not associating in recognised prides. Young lionesses breed at higher rates than older lionesses, with mature pride-living lionesses perhaps being better utilised for photo-tourism opportunities. An additional advantage of shooting young lions is that this age class are the ones most likely to kill livestock.

Ultimately the decision on what and how to hunt lions in SVC lies with the landowners, and needs to be integrated into the overall conservation and management objectives of the conservancy.

Appendix 2: Assessment of trophy hunted lion and leopard trophies

Guidelines for data collection

Sport hunting can provide considerable benefits to conservation if managed sustainably. However, this requires careful regulation and a high degree of compliance with “best practice” standards. This is particularly important for large carnivore species such as lion and leopard that are sensitive to human disturbance and have recently suffered widespread declines. There is a need to standardize data collected from lion and leopard trophies across their range to allow independent assessment of trophy age, trophy quality, and hunt effort. Such data can enable wildlife agencies to track population trends of hunted species over time and react to changes accordingly. The sex and age of harvested individuals will also influence the biological impacts of hunting, and must therefore be monitored closely. In addition, blood and skin samples can easily be taken from trophies to provide valuable information on disease and genetics in wild lion and leopard populations. These data would add immeasurably to conservation efforts.

Effective monitoring requires collaboration between professional hunters (PHs), operators, conservation authorities, and researchers. In this document we provide guidelines on the information and measurements that should routinely be taken from every trophy animal and each hunt. Some of the information is collected in the field by the professional hunter immediately after the hunt, while other data are collected at a later date by examining the cleaned skull. It requires no technical ability or special equipment other than a GPS, digital camera, and measuring tape; all of which are commonly used by sport hunters.

Section A: Information to be provided by professional hunters/operators

1. Hunt return forms

Measures of hunting effort can be used as an index to gauge population trends. This information is best collected on a printed hunt return form filled in by the PH after *every* lion and leopard hunt (i.e. for successful and unsuccessful hunts). Questions should not exceed one page (an example of a hunt return form is provided in Appendix I). The submission of hunt return forms must be mandatory; these data are only useful if collected in a rigorous and consistent manner. Operators must be penalised for failure to submit forms. The onus is on the operator to ensure that all information is sent to the relevant authority by the end of the hunting season. Self addressed envelopes can be provided if postage is necessary.

2. Measurements (included on the hunt return form)

Accurate measurements of body and skull size can assist authorities to age lion and leopard trophies. The Division of Scientific Authority from the U.S. Fish and Wildlife Service require measurements of body size to permit importation of leopard trophies into the United States. In addition, PHs and operators routinely measure skull width and height to provide a Safari Club International rating (width + height in inches) to clients. However, the SCI rating on its own is of limited use; the individual metrics in millimeters are needed to estimate age.

The following body measurements should be taken for every lion and leopard trophy before the animal is skinned:

- a) Body length (cm, tip of nose to tip of tail; Measurement A–C)
- b) Shoulder height (cm, tip of scapula to end of forepaw; Measurement E)
- c) Neck circumference - *only for leopard* (cm, immediately behind the ear; Measurement D)

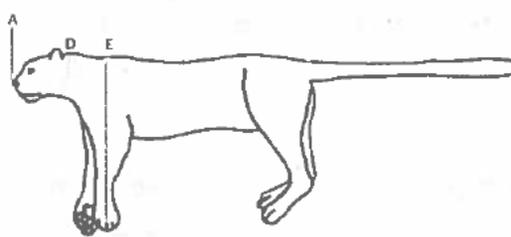


Figure 1: Body measurements to be taken for each trophy before skinning.

Skull measurements should preferably be done by wildlife officials with the skull in hand. However, if this is not possible, operators must provide accurate measurements from the cleaned skull. The following data should be collected:

- a) Skull length (mm, greatest length of skull, measured as a straight line between pegs)
- b) Skull width (mm, greatest width measured across zygomatic arches)
- c) Distance between the post-orbital processes

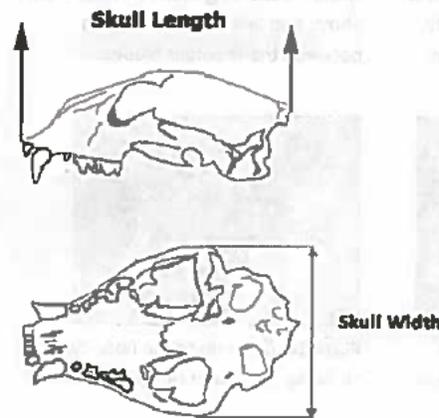


Figure 2: Skull measurements to be taken for each lion and leopard trophy.

3. Photographs

Photographs of the trophy can be used to age hunted lion and leopard effectively. While the traditional photographs taken by clients are useful, more detailed photographs showing body size, facial characteristics, nose pigmentation, tooth wear, and skull dimensions are required for reliable aging. They must be taken from the correct angle and at the highest possible resolution (minimum of 1MB per photo). Nose, teeth, and skull photographs are best taken with the macro-function setting (which is a feature on most cameras) to prevent blurring. The time and date must be correctly set for digital images. Images must also be labeled/tagged with the individual ID number (as appears on the hunt return form), the name of the operator, the name of the client, and the name of the hunting block or property where the hunt was undertaken. Digital images can either be sent by email or placed on a CD and posted with the hunt return form.

Six photographs are required for each lion and leopard trophy before it is skinned (Plates 1a-f and 2a-f) and a further six photographs from the cleaned skull (Plate 3a-f). The skull photographs and measurements should preferably be done by wildlife officials with the skull in hand. However, if this is not possible, operators must submit all twelve photographs.

Plate 1. Lion (before the trophy is skinned):



Plate 1a: Side view showing the entire body with the hunter directly behind for scale. Useful for assessing body size and condition, and basic mane development.



Plate 1d: Frontal view of the face showing facial scarring and the nose from directly in front.

Plate 1b: Side view of the head and shoulder showing mane development above and behind the ears, and between the shoulder blades.



Plate 1e: Close up of the nose clearly showing the extent of pigmentation.

Plate 1c: Frontal view of the head and chest. Useful for assessing mane development on the chest and between the ears.



Plate 1f: Frontal view of the teeth showing coloration and wear on the canines and incisors.

Plate 2. Leopard (before the trophy is skinned).



Plate 2a: Side view showing the entire body with the hunter directly behind for scale. Useful for assessing body size and condition.



Plate 2b: Side view of the head (lifted) and shoulders. Useful for assessing neck circumference and dewlap development.



Plate 2c: Frontal view of the face showing the position and condition of the ears, and facial scarring.



Plate 2d: Close up of the nose clearly showing the extent of pigmentation.



Plate 2e: Frontal view of the teeth showing coloration and wear on the canines and incisors.



Plate 2f: Posterior view of the hindquarters clearly showing the presence or absence of a scrotum.

Plate 3. Clean skull (same for lion and leopard)

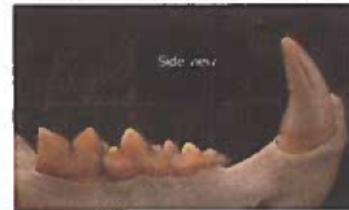


Plate 3a: Lower jaw showing all the teeth and chipping of the enamel ridge on the back of the canines.



Plate 3b: Upper jaw showing all the teeth and chipping of the enamel ridge on the back of the canines.



Plate 3c: Side view of the lower jaw (either side) showing the canine and wear on the cusps of molars and premolars

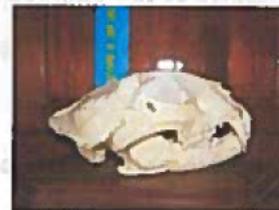


Plate 3d: Wide shot of all the teeth showing wear, broken teeth, and teeth coloration

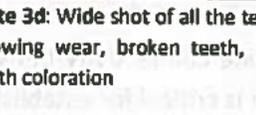


Plate 3e: Top view of the skull displaying the distance between the postorbital processes. A measure of scale must be included.

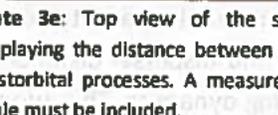
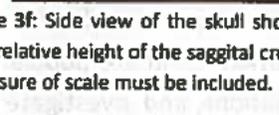


Plate 3f: Side view of the skull showing the relative height of the sagittal crest. A measure of scale must be included.



4. Removal of single rooted premolar (P²) for x-ray assessment

Post mortem x-rays of teeth can assist with aging trophies - the pulp cavity fills in as lion and leopard get older. The best tooth to remove is the first upper premolar (P² below); it does not matter from which side of the skull. P² is small and will not affect the overall appearance of the trophy. The tooth can be removed from the skull using a pair of pliers although care must be taken not to crack it. The tooth can be placed in an envelope and sent with the hunt return form and photographs. It is essential the envelope is correctly labeled with the individual ID number (as appears on the hunt return form), the name of the operator, the name of the client, the date the trophy was taken, and the name of the hunting block or property where the hunt was undertaken.



Section B: Additional information that should be collected from trophy animals

Trophy hunted lions and leopards provide a valuable opportunity to collect samples for ongoing conservation research projects. These samples may be particularly important from

areas where research is not currently taking place. They can be collected voluntarily by interested PHs and provided to researchers for analysis. The onus is on the researcher to provide collection materials, details of how the samples must be collected, and to collect the samples at the end of the season. Accurate labeling of each sample is essential with a GPS location (in decimal degrees), the name of the collector, the species, and the date as a minimum.

1. Skin, hair, and scat samples for genetic analysis:

Genetic samples collected from lion and leopard trophies can be used to assess sub-speciation, estimate population size and dispersal distance, examine connectivity between populations, and investigate inbreeding dynamics. This information is critical for establishing range-wide conservation strategies for large carnivores.

DNA can be collected from the trophy by cutting a very small (3-4 mm) disc of skin (that includes both tissue and hair) from anywhere on the carcass. This can be stored in a small cryotube containing either 95% ethanol or salt. If a sterile container is not available, several hairs can be plucked from the trophy (ensuring that the hair root is attached) and placed in a paper envelope.

Genetic material can also be sourced from lion and leopard scat collected by hunters (scat is often found near baits). The best way to handle the samples is to air dry them thoroughly and then to store them individually in sealed plastic bags.

2. Blood samples for disease analysis:

Certain feline diseases such FIV and canine distemper can be tested from blood samples taken by placing a Whatman blotting (filter) paper on the bullet wound until it has soaked through. The paper is then air-dried for 5-10 minutes and stored in an envelope in a cool place. No special techniques or materials are needed other than the Whatman paper, which will be provided by the researcher.

3. Trail camera photographs:

Many hunters now place trail cameras at baits to assess trophy quality prior to setting a blind. Photographs taken by trail cameras can be used by researchers to identify individuals in an area, estimate the relative abundance and vulnerability of different age cohorts in a population, and assess hunter selectivity. PHs must ensure that the date and time information is set correctly on cameras. They should also record the number of cameras that are deployed each day, the number of days that each camera is deployed, and the location (GPS position in decimal degrees) where cameras are deployed.

HUNT PERMIT NUMBER	<input type="text"/>	CLIENT NAME	<input type="text"/>
PROFESSIONAL HUNTER	<input type="text"/>	HUNTING OUTFITTER	<input type="text"/>
HUNTING BLOCK	<input type="text"/>	CONCESSION HOLDER	<input type="text"/>
HUNT START DATE	<input type="text"/>	HUNT FINISH DATE	<input type="text"/>

1. Was the hunt successful? YES NO
If no, why not? _____

2. Number of lion / leopard seen during hunt (please provide photographs if possible):

Free ranging: On baits:

3. Number of baits used (specify number and species e.g. 5 Impala, 1 zebra): _____

4. Number of bait sites: 5. Number of sites fed on by lion / leopard:

6. Sex and age of lion / leopard on baits (male, female, subadult, cubs) and how determined (tracks, camera-trapped, seen): _____

IF TROPHY WAS TAKEN:

7. Date trophy taken: 8. Time shot:

9. Location GPS (in decimal degrees):

10. Condition of animal (e.g. thin, fat, parasites, scars, wounds, sick, radio-collared, snare wounds, etc.): _____

MEASUREMENTS:

11. Skull length (mm):	<input type="text"/>	12. Skull width (mm):	<input type="text"/>
13. Body length (cm):	<input type="text"/>	14. Shoulder height (cm):	<input type="text"/>
15. Neck circumference (mm):	<input type="text"/>		

PHOTOGRAPHS (before skinning):

- Side view of entire body
- Side view of head and shoulders
- Front view of head and chest (for lion)
- Front view of face
- Close up of nose
- Hindquarters showing scrotum (for leopard)

PHOTOGRAPHS (clean skull)

- Posterior view of lower jaw
- Posterior view of upper jaw
- Side view of lower jaw
- Wide shot of all teeth

SAMPLES

- 2 x premolar for x-ray analysis
- DNA (4-mm tissue plug including hair)
- Saturated blood collection paper

Return form to:

Name:

Organisation:

Address:

Fax Number:

Email:

Appendix 3: Balancing financial and conservation imperatives: trade-offs to maintain viable large carnivore populations and profitable trophy hunting

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Summary

1. Large African carnivores are financially valuable for ecotourism and trophy hunting operations on private, communal and multiple-use state land utilised for wildlife production. However, above certain densities, such species may impose economic costs through impacts on populations of ungulates that are also valuable for trophy hunting. High densities of large carnivores may adversely affect conservation efforts involving smaller carnivore species such as vulnerable cheetahs (*Acinonyx jubatus*) and endangered African wild dogs (*Lycaon pictus*).
2. We investigated the economic and conservation trade-offs associated with managing various species of large carnivores on large, often privately or co-managed communal land (>1000km²), using a collaboratively managed private wildlife area in south-eastern Zimbabwe, Savé Valley Conservancy (3440km²) as a case study.
3. Lions (*Panthera leo*) impose substantial economic costs through predation on ungulates, specifically, but for leopards (*Panthera pardus*), trophy hunting benefits significantly outweigh their predation costs. Poaching further disturbed ecological processes.
4. We argue that introducing lions to wildlife production systems necessitates that income from lions is increased by either raising the price of lion hunts, or that income derived from photo-tourism is needed to offset the economic impact of lions.
5. Other members of the large carnivore guild do not influence financial and ecological dynamics nearly as strongly as do lions, and species such as endangered cheetahs and wild dogs may benefit from managed lower densities of lions in hunting concessions and private ranches.
6. Although lions fulfil many important ecological processes, that we have not quantified, there is a need to balance ecological and economic imperatives on private and co-managed communal land to ensure that wildlife-based land uses continue to compare favourably in financial terms with alternative and less conservation-friendly land uses, such as livestock production.

Key words, lions, leopards, predation, trophy hunting, financial implications, management, balancing costs

Introduction

Wild large herbivores provide goods and income to rural communities, have major impacts on land use and habitats of conservation importance and, in some cases, face local or global extinction. As a result, substantial effort is applied to their management across the globe (Gordon, Hester & Festa-Bianchet 2004). In areas where herbivores are commercially utilized, large carnivores can create both economic costs and benefits (Peel & Montagu 1999; Power 2002; Caro *et al.* 2009). In Africa, lions (*Panthera leo*) and leopards (*Panthera pardus*) are unambiguously valuable for ecotourism operations, are high value trophy hunting species, and attract high-paying international tourists (Grobbelaar & Masulani 2003; Booth 2004; Loveridge *et al.* 2007). However, all carnivores impose a cost by consuming herbivores. Thus while sport hunting has provides important economic incentives for conserving wild herbivores, the benefits of wildlife-ranching with large carnivores are less clear (Lindsey *et al.* 2005b).

At natural densities African large carnivores regulate herbivore populations (Fryxell, Greever & Sinclair 1988; Mills & Shenk 1992; Grange *et al.* 2004; Grange & Duncan 2006). Lions especially are the key drivers of this process, being one of the strongest ecological drivers in African savannas (Funston & Mills 2006; Grange & Duncan 2006). Thus, there is a limit to the number of herbivores that can be sustainably removed when lion populations approach equilibrium (Peel & Montagu 1999). These effects are also strongly cyclical, influenced by rainfall variability (Mills, Biggs & Whyte 1995; Funston & Mills 2006; Owen-Smith & Mills 2008a). Predator numbers must be accounted for when calculating harvests of herbivores. Many wildlife populations are additionally impacted by poaching (Lindsey *et al.* 2011).

While most large African carnivores tend to kill smaller, less valuable prey species (Pole *et al.* 2004; Radloff & du Toit 2004; Hayward *et al.* 2006a; Hayward *et al.* 2006b), lions select mainly medium- to large-sized ungulates (Funston *et al.* 1998; Radloff & du Toit 2004; Hayward & Kerley 2005, 2008) that are valuable. If lions and other carnivores reduce the sustainable yield of herbivores, they come into direct competition with hunting operators and local communities that benefit from these resources. This is a world-wide phenomenon where large carnivores occur (Langholz *et al.* 2000). In most countries in Africa, the surface area that is designated either communal or national hunting concessions/game reserves is substantially larger than areas covered by national parks where no hunting is generally allowed (Wilkie & Carpenter 1999; Archabald & Naughton-Treves 2001).

Many of these areas offer the possibility of conserving lions, leopard and spotted hyena (*Crocuta crocuta*), but these species often result in conflict leading to persecution (Ogada *et al.* 2003; Woodroffe & Frank 2005; Kissui 2008; MacIennan *et al.* 2009) or are overhunted (Loveridge *et al.* 2007; Packer *et al.* 2009). However these areas offer ideal habitat for rarer large carnivore species such as cheetahs (*Acinonyx jubatus*) (Durant 2000; Gros 2002; Marker *et al.* 2003) and wild dogs (*Lycaon pictus*) (Woodroffe & Ginsberg 1999; Creel & Creel 2002; Lindsey, du Toit & Mills 2004; Woodroffe *et al.* 2007). Dominant large carnivores, however, can also impact cheetah and wild dog

populations negatively through direct and indirect mechanisms (Caro 1994; Laurenson 1994; Laurenson, Wielebnowski & Caro 1995; Creel & Creel 1996; Durant 2000; Creel, Mills & McNutt 2004). As a model for other areas we examined the Savé Valley Conservancy (SVC), a 3,440 km² privately owned ranch in Zimbabwe, where hunting provides the main source of income (Lindsey *et al.* 2011). We used spreadsheet models to evaluate the financial implications of large carnivores in private wildlife areas, and discuss the need for management of lion populations for both economic and ecological sustainability.

Methods and methods

2.1. Study area

Savé Valley Conservancy (3,440km²), located in a semi-arid area of southeast Zimbabwe, was formed in 1991 by amalgamating 20 cattle ranches, into which 14 species of wildlife reintroduced, and land use shifted to high quality ecotourism and trophy hunting (Lindsey *et al.* 2008). These land use objectives were pursued successfully until a third of the conservancy was annexed in 2001 during Zimbabwe's land 'reform' program (Lindsey *et al.* 2008). Photo-tourism is now almost non-existent and there are high levels of poaching (Lindsey *et al.* 2011).

Large carnivores were all but extirpated by the cattle ranchers (du Toit 1994; Pole 1999). However, in SVC all have increased through natural recolonization, or augmentation, with lion and spotted hyenas populations showing the longest lag effect. Wild dogs, however, increased rapidly following recolonization of the area in 1992 (Pole 1999), due to their high fecundity, the absence of lions, and abundant prey. They peaked at 3.9 wild dogs/100 km² in 2004, the highest density on record (Pole 2006; Lindsey *et al.* 2008). Cheetah populations also increased rapidly, but for unexplained reasons declined 2005. Leopard densities seem to have remained relatively high throughout (C.J. Joubert, *pers. comm.*).

2.2. Population estimates

Annual total-count aerial surveys of larger herbivores from 2004 to 2010 (Joubert & Joubert 2010), with adjustment for undercounting (Bothma *et al.* 1990), estimated populations of ten key large carnivore prey species. For large carnivores wild dogs were estimated annually from 1996 through individual monitoring. Lion and spotted hyena populations were estimated sporadically from 1996 to 2007 using call-up surveys (Pole 1999; Pole 2003). From 2007 estimates for large carnivores other than wild dogs were by annual track density index surveys (Funston *et al.* 2010). The generalised model of Funston *et al.* (2010) was used for all species other than leopards where Stander's (1998) model was more appropriate. Cheetah and leopard populations were assumed to be relatively stable from 2005 to 2008. Population estimates for years without surveys were estimated from graph trend lines. Population carrying capacities of large carnivores were determined based on herbivore abundance models (Hayward, O'Brien & Kerley 2007).

2.4. Model development

To assess the impact of all forms of mortality on economics and ungulate trends we built a spreadsheet model with various key inputs.

2.4.1. Prey preferences of large carnivores

To determine the relative proportion of various ungulate species in the diet of large carnivores, where possible we used data from SVC. Scat analyses (Mbizah 2009) provided the basis for determining the prey preferences, but low numbers of lion and cheetah scats necessitated using data from nearby Kruger National Park (Kruger) (Radloff & du Toit 2004). Importantly, eland (*Taurotragus oryx*) and sable antelope (*Hippotragus niger*) did not occur in the area sampled by Radloff & du Toit (2004), and were thus factored into our prey preferences relative to abundance, and accounted for all 'other' species killed by lions, being relatively preferred by lions (Hayward & Kerley 2005).

2.4.2. Predation rates

To estimate annual predation rates we used daily minimum food requirements (Table 1) to calculate the number of adult female equivalents, based on body mass (Skinner & Smithers 1990), of each herbivore that would need to have been killed to meet their needs, in proportion to the prey preference ratios. The available biomass per kill was an estimate of the relative proportion of meat available from small- (<100 kg = 75%), medium- (100-300 kg = 66%) and large-sized (>300 kg = 60%) ungulates. Adults were assumed to make up 50% of each large carnivore population, and sub-adults and cubs were assumed to consume 50% of the adult female requirement (Table 1). However, due to differences in the diets of male and female lions (Funston *et al.* 1998; Radloff & du Toit 2004), we calculated predation rates for each sex.

Table 1. Minimum daily food requirements of the various large carnivore species

	Adults (kg)	Sub-adults and cubs (kg)	Literature source
Female lions	5	2.50	(Schaller 1972)
Male lions	7.5		(Schaller 1972)
Leopards	2.5	1.25	(Bailey 1993)
Cheetahs	2.8	1.20	(Frame 1999)
Wild dogs	2.8	1.40	(Pole 1999)
Spotted hyenas	4.0	2.00	(Henschel & Tilson 1988)

The total numbers of ten important herbivores killed per large carnivore species per year was estimated by combining the relative proportions of herbivores in the diet, the biomass requirements of each large carnivore, and the numbers each prey species that an individual would kill, multiplied by the annual population estimate of each large carnivore species. We halved this for spotted hyenas as in nearby Kruger spotted hyenas hunted only 50% of their diet, scavenging the rest (Henschel & Skinner 1990).

2.4.3. Determining ungulate population trends

We estimated mortality by summing all quantifiable causes of ungulate mortality. These included trophy hunting, live-capture, poaching and predation estimates. The number of animals found poached from 2005-2009 was adjusted following Lindsey *et al.* (2011). To validate this section of the model we calculated growth rates for time t to time $t+1\text{year}$ that would have been required to reach the population estimates of the following year.

2.4.3. Economic calculations

The financial gains from trophy hunting were calculated as the trophy fee value and the meat value of each animal hunted. However, for buffalo (*Syncerus caffer*) and sable, which were used to sell hunting packages commanding a daily rate in addition to trophy fees, hunt-package fees were also included in the model (calculated as minimum hunt duration x daily rate). The financial losses attributable to predation, poaching and live sales were calculated by summing the value lost in terms of meat, foregone trophy fees, and for buffalo and sable for foregone hunt-package fees. Removals of zebra (*Equus burchelli*) was assumed to result in the additional loss of the value of skins (US\$200/individual) (Lindsey *et al.* 2011). All trophy values, daily rates and minimum hunt durations were taken from the main hunting outfitter in the area (Zambezi Hunters 2010).

The value of meat was estimated from the mean adult female body mass of each species (Skinner & Smithers 1990), the mean percentage of body mass comprised of flesh (Bothma, van Rooyen & du Toit 2010), and the mean price that meat was sold for (USD 1.50kg⁻¹). As animals lost to either predation or poaching would not necessarily have been trophy animals, only the average percentage of the overall population of each species hunted from 2005-2009, were considered to be trophies, for which the relevant fee or combined hunt package fee was used to determine that proportion of the losses incurred to large carnivores. To estimate the net economic cost or benefit of various large carnivore species we calculated the annual value of herbivores killed by each carnivore species from the model. We then compared this with the total financial value accrued from hunting those species.

Results

3.1. Population estimates

Buffalo were the only herbivore species that increased in numbers from 2004-2010 (Fig. 2). Populations of giraffe (*Giraffa camelopardalis*), sable antelope, and wildebeest (*Connochaetes taurinus*) remained relatively stable, while eland, kudu (*Tragelaphus strepsiceros*), waterbuck (*Kobus ellipsiprymnus*), zebra, impala (*Aepyceros melampus*) and warthog (*Phacochoerus aethiopicus*) declined. Most large carnivores increased over a ten year period (Fig. 3), with the numbers of lions,

spotted hyenas and cheetahs in SVC being significantly lower than would be expected based on available prey ($\chi^2 = 203$, $df = 4$, $P < 0.01$) (Table 2).

Table 2. Actual population estimates and predicted population sizes for SVC based on average adjusted herbivore numbers from 2005 to 2009, based on the model of Hayward *et al.* (2007)

	Estimated population in 2009	Potential carrying capacity
Lions	148	271
Leopards	249	136
Cheetahs	5	55
Wild dogs	60	63
Spotted hyenas	123	427

3.2. Large carnivore utilization

From 2005 to 2009 seventeen lions were hunted (mean = 3.4 lions year⁻¹), yielding gross income of US\$912,900 (US\$182,580 year⁻¹). During the same time 144 leopards were hunted (mean = 28.8 leopards year⁻¹), generating a gross income of US\$2,135,232 (US\$427,046 year⁻¹). A few cheetahs (n = 5) and spotted hyenas (n = 6) were also hunted, with wild dogs being legally protected.

3.3. Model results

The estimated relative proportion of herbivore prey in the diet of large carnivores was used to estimate the number of prey species killed by each individual large carnivore per year (Table 3). Data showed that lions preyed mostly on large herbivores, with male lions preying more heavily on buffalo (Table 3). Herbivore growth rates, determined from aerial surveys, showed that the average required population growth rates generated by the model were similar to those recorded elsewhere (Table 4).

3.3.4. Economic calculations

The model showed that lions, poaching and spotted hyena predation had the greatest proportional financial impact, whereas the costs of leopards, wild dogs and cheetahs were proportionally very much less (Fig. 4). It also showed that at all lion abundances the net cost to predation by lions exceeds the gross income from hunting them, irrespective of the formula used (Fig. 5). It should be noted though that gross income from trophy hunting the selected herbivores, lions and leopards, exceeded the financial losses to poaching and predation by an average of 74%, (Table 5).

Even relatively low earnings per landowner from photo-tourism that could be attributed to the presence of lions (e.g. US\$5,000 per year⁻¹), combined with a 5% male lion harvest, resulted in a positive gross financial benefit for up to 70 individuals. These benefits increase as the tourism income ascribed to the presence of lions increases, with 135 lions resulting in no gross costs if each landowner was earning

Table 3. Percentage of herbivores in the diet of the large carnivores used in the development of the model, with the estimated number of each key ungulate species caught per individual predator per year

Prey size / species	Percentage of each prey species (number of prey species caught year ⁻¹)					
	Male lions	Female lions	Leopards	Cheetahs	Wild dogs	Spotted hyenas
Large (>350 kg)						
Buffalo	45.0 (4.50)	1.2 (1.20)	4.8 (0.00)	0.1 (0.02)	-	2.6 (0.05)
Eland	4.0 (1.00)	4.5 (0.22)	0.0 (0.05)	-	-	1.3 (0.03)
Giraffe	19.3 (1.10)	4.3 (0.12)	-	-	-	-
Medium (100 – 350 kg)						
Kudu	1.4 (0.40)	9.3 (1.23)	7.5 (0.50)	3.7 (0.23)	12.5 (1.16)	19.2 (1.01)
Sable	1.1 (0.20)	2.0 (0.23)	0.1 (0.35)	-	0.1 (0.11)	6.4 (0.20)
Waterbuck	1.4 (0.30)	3.1 (0.36)	1.5 (0.26)	1.2 (0.07)	4.2 (0.34)	2.6 (0.12)
Wildebeest	2.1 (0.50)	10.9 (1.17)	6.0 (0.32)	2.7 (0.14)	1.4 (0.11)	6.4 (0.28)
Zebra	6.4 (0.90)	8.4 (0.58)	-	-	-	-
Small (<100 kg)						
Impala	13.6 (12.10)	40.2 (17.94)	60.3 (14.99)	67.7 (14.50)	73.6 (16.46)	46.2 (8.25)
Warthog	5.7 (3.70)	11.3 (3.65)	7.5 (0.24)	4.2 (0.65)	2.8 (0.63)	-
Other	0.0	1.2	17.2	20.6	5.5	15.3

Table 4. Mean growth rates of the key herbivore populations in the Savé Valley Conservancy from 2005 to 2009, and the growth rates needed to match the next year's aerial estimates after all mortality had been accounted for. These growth rates were compared with mean growth rates of herbivores in Kruger National Park and a variety of South African game ranches and reserves (from Bothma *et al.* 2010)

	In SVC from 2005-2010	Required to achieve the years estimate	Kruger National Park (high predator densities)	Game ranches (low predator densities)
Buffalo	8.9	14.7	16*	12-18
Eland	-6.2	0.2		11-38
Giraffe	-0.2	6.9	5.2	12
Kudu	-17.1	23.4	14.8	13-28
Sable	-2.1	11.0		12-28
Waterbuck	-14.0	9.6	13.4	15-35
Wildebeest	-2.2	5.2	17.4	28-38
Zebra	-11.1	0.8	12.4	21-29
Impala	-8.7	26.8	11.6	23-48
Warthog	-18.4	10.2	12.3	

Table 5. The relative gross financial benefits (in US dollars) of trophy hunting ten key herbivores species, leopards and lions, relative to the costs incurred by poaching and predation

	2005	2006	2007	2008	2009
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Hunting income:					
Selected herbivores	1,689,670	2,104,260	2,11,8750	2,470,990	2,423,870
Lions	161,100	161,100	161,100	107,400	322,200
Leopards	400,356	504,152	504,152	370,700	355,872
Total	2,251,126	2,769,512	2,784,002	2,949,090	3,101,942
Income lost to poaching (%)	132,065 (5.9)	90,506 (3.3)	139,969 (5.0)	171,091 (5.8)	179,279 (5.8)
Income lost to predators (%)	437,670 (19.4)	496,561 (17.9)	457,874 (16.4)	693,357 (23.5)	906,450 (29.2)

US\$10,000 year⁻¹ from lion related photo tourism (Fig. 5). For leopards, however, there was a gross financial benefit at all abundance levels (Fig. 5).

4. Discussion

4.1 Ungulate populations

Large carnivores influence herbivore populations in profound ways that are often associated with climatic variability. Thus managers need to monitor trends and interpret them in the context of rainfall patterns, predation pressure, and human mortality. In our case study combined pressures of hunting, live sales, poaching, and predation may be negatively influencing the populations of some herbivore species, such as eland, kudu, waterbuck, zebra, impala and warthog. Buffalo, the highest value species, however, showed positive population growth and sable antelope, another high value species, seemed to be stable. There are several explanations for, and implications of, these trends. Firstly, climatically SVC has experienced wetter than average rainfall conditions in the last decade that would be expected by to induce predation driven declines for kudu, waterbuck, zebra, wildebeest and warthog (Mills *et al.* 1995; Funston & Mills 2006; Owen-Smith & Mills 2008b). Zebra are important prey species of lions (Mills & Shenk 1992; Hayward & Kerley 2005) and can be vulnerable to over predation as they have foals throughout the year that are preferred by lions, and show relatively slow development when compared with other ungulates (Grange *et al.* 2004; Grange & Duncan 2006). This cautions against the over utilization of zebra with lions potentially shifting to more valuable herbivore species should the zebra population decline. Eland are highly preferred prey of lions (Hayward & Kerley 2005), and due to their very mobile nature may also be more susceptible to poaching, both of which may be driving population declines. Impala are important prey of all large carnivores (Hayward & Kerley 2008; Owen-Smith & Mills 2008a), which when combined with high hunting, management offtake and poaching may be driving population declines.

4.2. Large carnivore populations

Large carnivore populations were stable or increasing. In terms of their impact on the herbivore-economic dynamic, management mainly needs to decide the best course of action with respect to the dominant influence of lions. Currently lions are at about half of expected ecological equilibrium, at which point lions would have an economic impact that could not be offset by hunting. Moreover

with current herbivore offtakes through hunting, poaching and live sales, such predation levels would be expected to result in herbivore collapse.

In Africa, interactions within the large carnivore guild result in cheetahs (Laurenson 1994; Durant 2000) and wild dogs (Mills & Gorman 1997; Creel & Creel 2002) declining in response to high lion and spotted hyena abundance. Conversely mesopredator release can benefit these species, as well as leopards, when lions and spotted hyenas abundances are low (Crooks & Soulé 1999; Pole 1999; Packer *et al.* 2009). Generally dominant larger carnivores have negative effects on rarer smaller species (Kitchen, Gese & Schauster 1999; Bonesi & Macdonald 2004). These effects have implications for attempts to conserve smaller carnivores both generally and through reintroductions (Lindsey *et al.* 2005a). In SVC, where the wild dog population comprises a significant component (c. 17%) of a small and declining national population, local declines are a concern. Therefore, for lion populations to be temporarily controlled to achieve conservation objectives for endangered species could be considered reasonable practice (Linnell & Strand 2000).

4.3 Economic implications

Several key deductions can be made from the economic model. Firstly, the gross income from trophy hunting of herbivores and carnivores, plus live sales of herbivores, collectively outweighed the losses incurred by predation by a substantial margin. This is likely to be true of any area. However, the net income was not known, and the initial capital investments and running costs of the ranch and hunting safaris, as well as losses to predation and poaching, may well exceed income from hunting. Several landowners reported that with a hunting-only model they were making a net loss, and that if hunting only was applied to remedy this, this would not be sustainable. Seemingly in SVC the only way to make lions more financially viable would be to incorporate photo-tourism, or not have high value species such as sable antelope on the conservancy with lions, or buffalo vulnerable to lions.

We do though make one important caveat in our conclusions. In our case study we were dealing with a recovering lion population substantially below carrying capacity. Lions need to hunt in large groups to successfully hunt buffalo (Scheel & Packer 1991; Funston, Mills & Biggs 2001). We did not have kill data available and it is possible that we overestimated the predation rates on buffalo. Furthermore, lion predation on buffalo varies dramatically with rainfall regimes (Mills *et al.* 1995; Owen-Smith & Mills 2008b) and under current rainfall lions would not be expected to predate heavily on buffalo. However, buffalo remain an important prey species for lions and in terms of the general applicability of the model we believe that without data to the contrary one has to assume that on average buffalo would comprise roughly the proportions in the diet of lions that we used.

Lion predation accounted for the bulk of the loss (47%) to large carnivores, which when the income generated from trophy hunting lions was subtracted, resulted in a net loss of US\$115,705 year⁻¹ specifically for lions. Leopards, on the other hand resulted in a net benefit of US\$ 395,151 year⁻¹. Thus while it is clear that lions impose a substantial cost to a wildlife production system (about 8% loss relative to gross income), the impact of this needs to be evaluated against the objectives of the reserve. The model presented in Fig. 5 indicates a harvesting percentage of five percent of the population. This quota may, however, be too high, and result in social instability in a lion population, with harvest rates of about three percent (Creel & Creel 1997), and the hunting of older males

generally being recommended (Whitman *et al.* 2004; Loveridge *et al.* 2007). Adding a small number of lionesses to the hunting quota did not increase the relative profitability of lions substantially, but may be needed if regulating the population of lions was defined as a management need (Packer *et al.* 2009). In order to protect large carnivore populations from declining, national authorities worldwide generally only allow the hunting of male large carnivores as trophies (Whitman *et al.* 2004; Packer *et al.* 2009). However, livestock and wildlife producers and local communities may need, under certain circumstances, to shoot adult female large carnivores to either halt or reduce population levels (Packer *et al.* 2009).

Lion trophy fees in Zimbabwe (US\$5,983) are substantially lower than the average trophy fees in other African countries (US\$14,584) (Booth 2009). However, even if lion hunt prices were increased from the current SVC price of US\$53,700 (Zambezi Hunters 2010), or the Zimbabwe average of US\$51,918 to the African average of US\$70,115 (Booth 2009), at a harvest rate of 3% lions would not be any more profitable. Before applying this model, elsewhere, it should be parameterised by local values of all variables, which might influence findings. Lion hunting is an important income generator in Africa hunting concessions (Booth 2009), especially in arid areas without mega-herbivores and buffalo, and where leopards occur at low densities (Stander 1998; Martin 2008). If lions were listed on CITES Appendix 1 this would impose severe restriction on hunting lions and essentially terminate this avenue of income generation. Such a listing would have major implications for management decisions in private wildlife and communal areas, where other interventions (including poisoning) may be employed to reduce lion densities to protect populations of herbivores (both wild and domestic).

Overutilization of leopards was possibly occurring in SVC. Leopards, like lions, are susceptible to overharvesting of adult males as they are an infanticidal species (Packer *et al.* 2009; Packer *et al.* 2011). In SVC the high current abundance of leopards may be as a result mesopredator release owing to low sympatric lion abundances. However, a higher lion population, combined with sustained high hunting pressure, is likely to result in a decline in leopard abundance. Thus in areas where leopard hunting predominates as an economic activity, it may be advisable to regulate lions at a level where they do not impact additionally on the leopards.

4.4 Management implications

Due to the relatively high costs associated with lion predation, landowners in wildlife production systems or rural communities co-existing with lions should consider generating income from lions in other ways. High quality ecotourism operations in areas of exceptional scenery and wildlife resources have clear economic potential, and should be encouraged wherever possible (Barnes 2001). Lions are one of the cornerstones of the photo-tourism industry worth substantially more alive than dead in most areas (Thresher 1981). However, photo-tourism is susceptible to political instability (Reid 1999), and is often not viable in areas lacking high densities of wildlife, scenic splendour, client safety or adequate infrastructure (Krüger 2005). Zimbabwe has been politically unstable for an extended time period, and there is currently little photo-tourism demand or suitable tourism infrastructure in SVC.

Consequently, to allow wildlife-based land uses to compete with alternative options (e.g. livestock ranching or agriculture) it is important that landholders and communities are able to utilize wildlife to generate sufficient income to offset the costs of wildlife. This may include well managed sustainable trophy hunting, which in many areas is the only viable means of generating income from wildlife (Child 1996). Ultimately the responsibility to decide how many lions should occupy a private area lies with landholders. This model is applicable anywhere in the world where large carnivores live on private or rural land, but because of their size and preferred prey is particularly relevant to areas with African lions.

In private or communally owned wildlife areas, management of larger carnivores may be necessary to maximize other returns (Packer *et al.* 2009). This may in turn create favourable opportunities that ensure the persistence of competitively inferior and endangered large carnivores, and may even be justifiable on these grounds alone in some small state protected areas.

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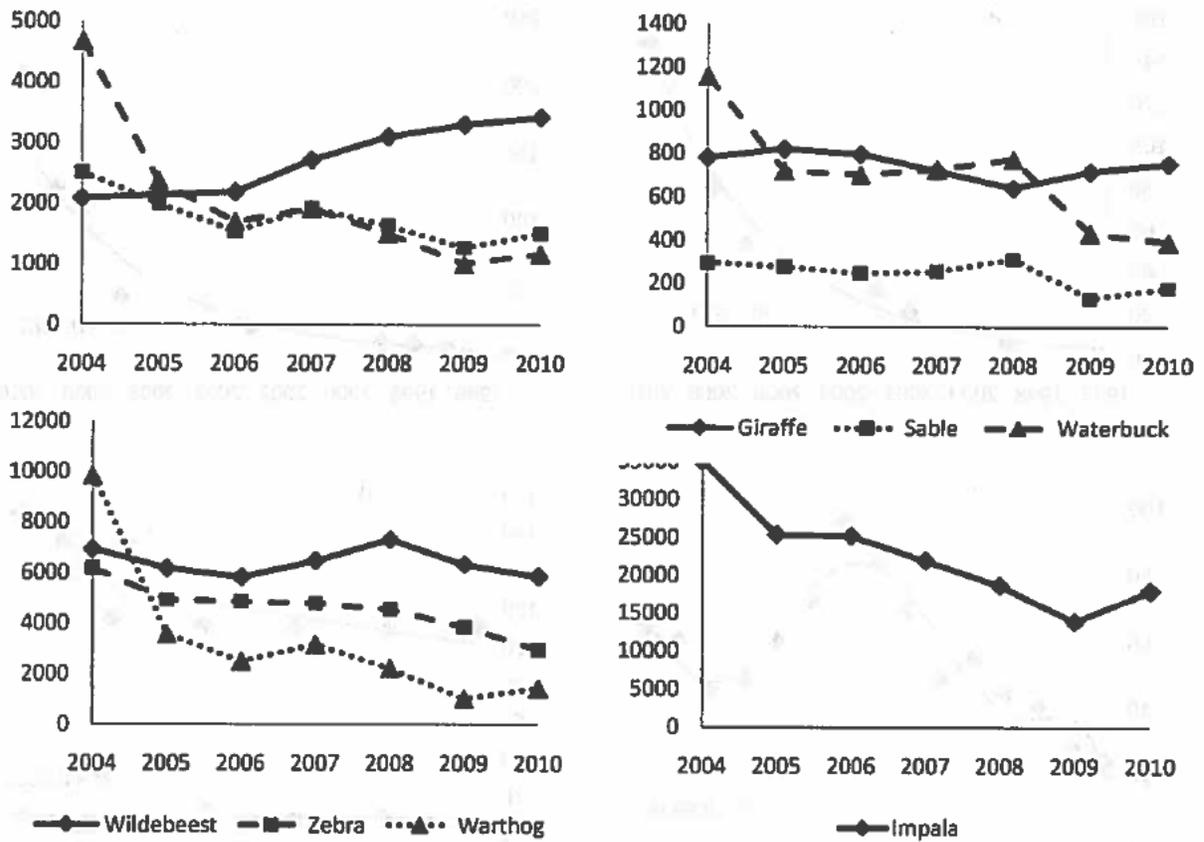


Figure 1. Population trends of ten key herbivore species in Savé Valley Conservancy from 2004 to 2010

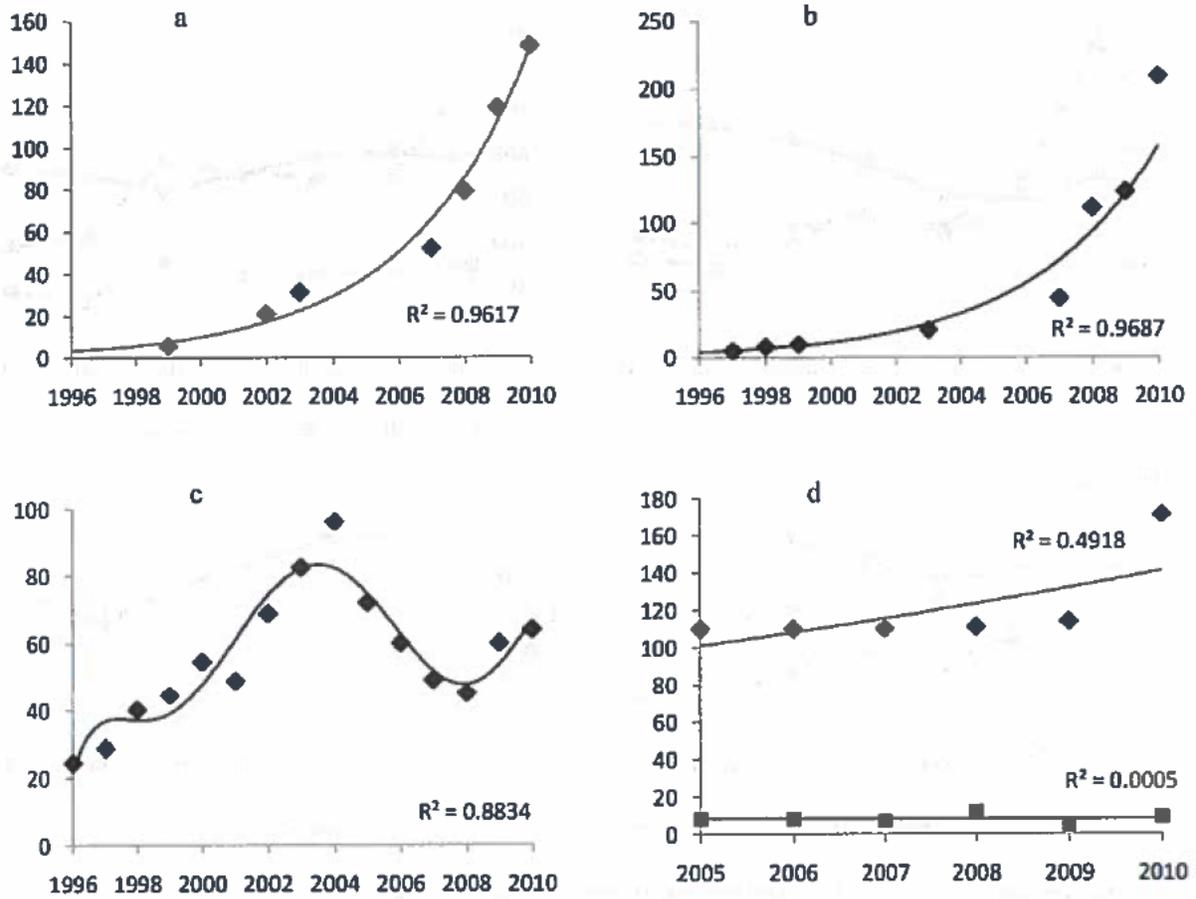


Figure 3. Population trends of a) lions, b) spotted hyenas, c) African wild dogs, and d) leopards (diamonds) and cheetahs (squares) in the Savé Valley Conservancy from 2000 to 2010. Best fit trend lines are fitted: exponential for lions, hyenas and leopard, polynomial order 6 for wild dogs and linear for cheetah

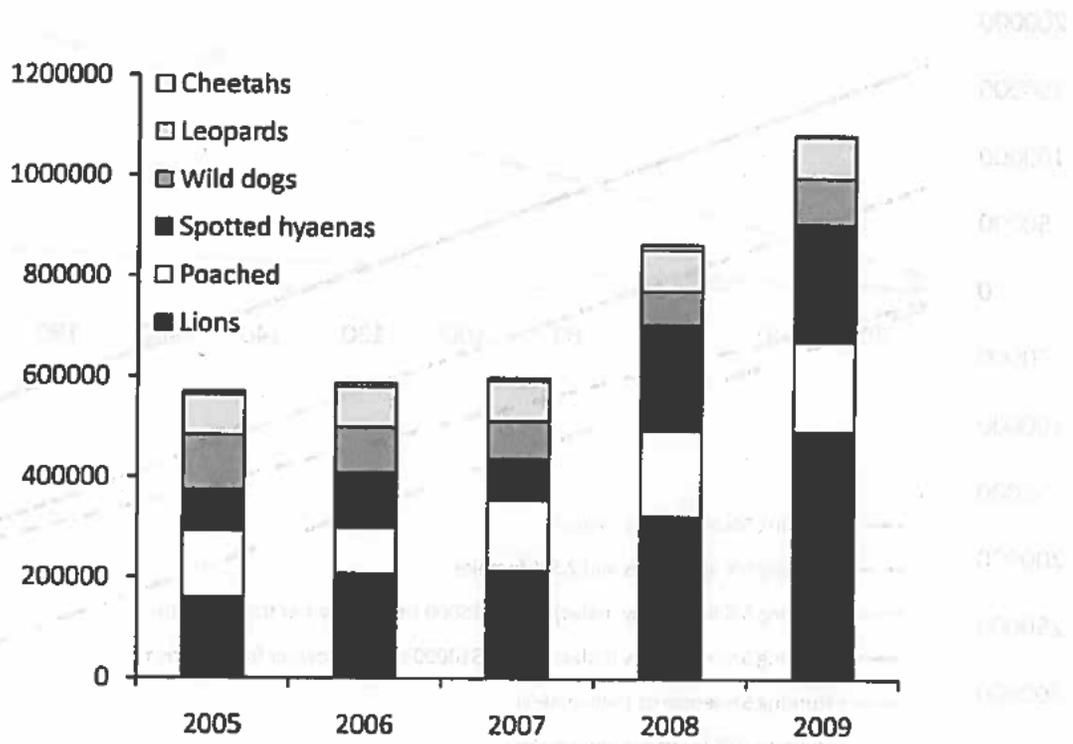


Figure 4. Stacked bar graph depicting the proportional economic losses in US dollars lost in the SVC to the five main predators and poaching from 2005 to 2009

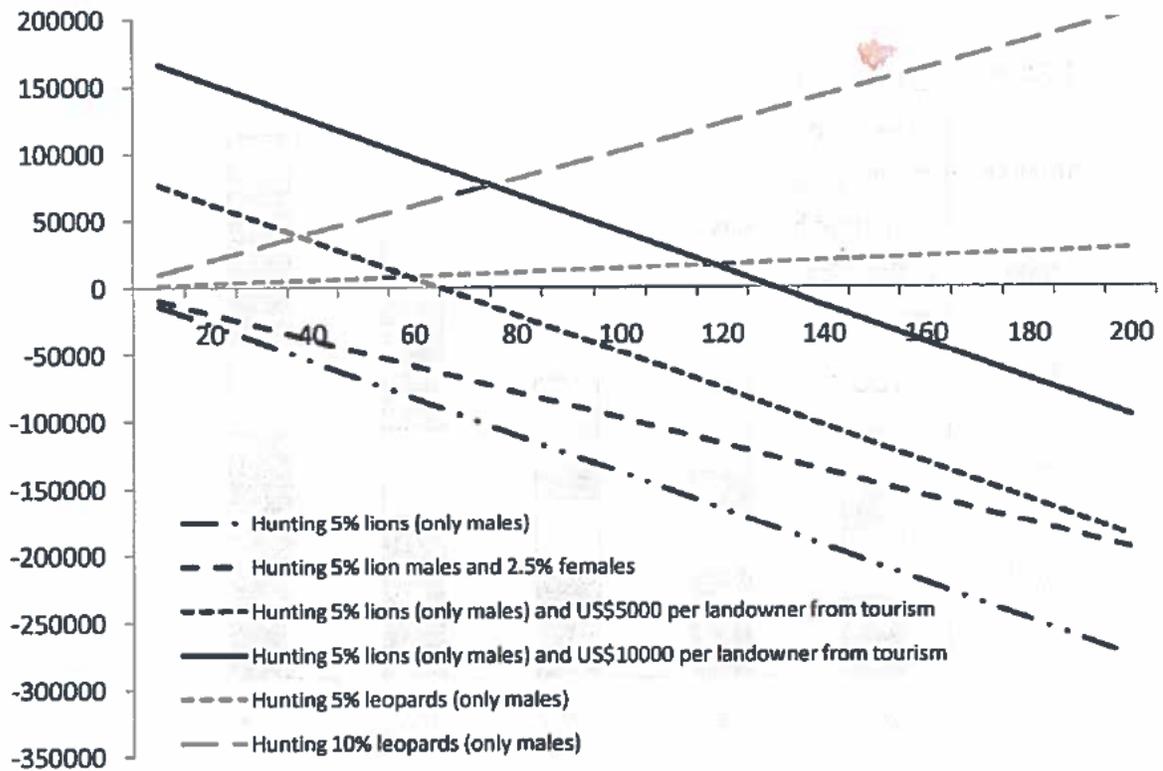


Figure 5. Projected net benefits of trophy hunting and photo-tourism based on 2009 trophy and day hunting fees for landowners in the Savé Valley Conservancy using various hunting offtake percentages. Number of individuals is displayed on the X axis.

80-3842/1222

(b) (6)

DATE 8/16/19

(b) (6)

PAY TO THE ORDER OF U.S. Fish and Wildlife Service \$ 100⁰⁰ ~~100~~ ⁰⁰ ~~100~~

one hundred and No/100

DOLLARS

(b) (6)

*

Rabobank, N.A.
P.O. Box 6002
Arroyo Grande, CA 93421-6002
Customer Service 800-943-6223



Lion permit

MEMO

(b) (6)



RCVD MAR 28 2019

Department of Interior U.S. Fish and Wildlife Service Federal Fish and Wildlife Permit Application Form

Type of Activity

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

IMPORT OF SPORT-HUNTED TROPHIES under Appendix I of the Convention on International Trade in Endangered Species (CITES) and/or U.S. Endangered Species Act (ESA)

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

Section A: Complete if applying as an individual

1.a. Last Name NIMMONS	1.b. First Name THOMAS	1.c. Middle Name/Initial ANDERSON	1.d. Suffix
2. Date of Birth (mm/dd/yyyy) (b) (6)	3. Telephone Number	3.a. Alternate Telephone Number	4. E-mail address

Section B: Complete if applying on behalf of a business, corporation, public agency, Tribe, or institution

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

Section C: All applicants complete address information

(b) (6)				
1.b. City LEXINGTON	1.c. State GA.	1.d. Zip code/Postal code (b) (6)	1.e. County/Province	1.f. Country USA
2.a. Mailing address (include if different than physical address; include name of contact person if applicable) N/A				
2.b. City	2.c. State	2.d. Zip code/Postal code	2.e. County/Province	2.f. Country

Section D: All applicants MUST complete

1. Attach the nonrefundable application processing fee in the form of a check or money order payable to the U.S. FISH AND WILDLIFE SERVICE in the amount of \$100. Federal, Tribal, State, and local government agencies, and those acting on behalf of such agencies, are exempt from the processing fee-- attach documentation of fee exempt status as outlined in instructions [50 CFR 13.11(d)].
2. Certification: I hereby certify that I have read and am familiar with the regulations contained in Title 50 Part 13 of the Code of Federal Regulations and the other applicable parts in subchapter B of Chapter I of Title 50, and I certify that the information submitted in this application for a permit is complete and accurate to the best of my knowledge and belief. I understand that any false statement herein may subject me to the criminal penalties of 18 U.S.C. 1001.
Signature of applicant/Principal Officer for permit (No photocopied or stamped signatures) Date of signature (mm/dd/yyyy) (b) (6) 03/08/2019

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

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

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

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

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

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

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

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

Please provide the following information. Complete all questions on the application. Mark questions that are not applicable with "N/A". If needed, use a separate sheet of paper. On all attachments or separate sheets you are submitting; please indicate the application question number you are addressing. If applying for more than one trophy, be sure to answer questions 4-6 for each trophy addressed in this application. If importing trophies from more than one country, you must submit a separate application for each shipment in order to obtain separate import permits.

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

THOMAS NIMMONS

SAME AS PG. 1

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

THOMAS A. NIMMONS

(b) (6)

3. Disqualification factor. A conviction, or entry of a plea of guilty or nolo contendere, for a felony violation of the Lacey Act, the Migratory Bird Treaty Act, or the Bald and Golden Eagle Protection Act disqualifies any such person from receiving or exercising the privileges of a permit, unless such disqualification has been expressly waived by the Service Director in response to a written petition. (50 CFR 13.21(c)) Have you or any of the owners of the business, if applying as a business, been convicted, or entered a plea of guilty or nolo contendere, forfeited collateral, or are currently under charges for any violations of the laws mentioned above?

No Yes

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

4. For each trophy to be imported, provide:

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

PANTHERA LEO

b. Sex (if known). MALE

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

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

REPUBLIC OF SOUTH AFRICA -
TOWN - WINBURG RANCH SMALDEEL
PROVINCE FREE STATE

b. Date wildlife is to be hunted:

+ - SEPTEMBER 2019

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

HUNTING OUTFITTER
GABRIEL G VAN SCHALKWYK } (KALAHARI)
PRIDE }
SAFARIS }

6. IF THE TROPHY HAS ALREADY BEEN TAKEN, please enter the following information:

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

N/A

b. Date wildlife was hunted:

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

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

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

HAVEN'T HUNTED YET

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

Name: JOE REGAL

Business Name: JOE REGAL TAXIDERMY

Address: FARM Thelma PO BOX 339

City: ODENDAALSRUS

State/Province: R.S.A.

Country, Postal Code:

9460

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

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

YES see ADDITIONAL SHEETS

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

YES SEE ADDITIONAL SHEETS

LICENSE FEES / PERMITS S.A.GOUT. / TROPHY FEES

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

YES SEE ADDITIONAL SHEETS

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

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

I acknowledge that the sport-hunted trophy/trophies to be imported has been/will be personally hunted by my client and is being imported only for my client's personal use (i.e., not for sale, transfer, donation, or exchange that is reasonably likely to result in economic use, gain, or benefit). If applying for the import of an elephant trophy, I understand that my client may import no more than two elephant trophies in one calendar year.

Taxidermist/Broker's signature: _____ Date: _____

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

I acknowledge that the sport-hunted trophy/trophies to be imported has been/will be personally hunted by me and is being imported only for my personal use (i.e., not for sale, transfer, donation, or exchange that is reasonably likely to result in economic use, gain, or benefit). If applying to import an elephant trophy, I understand that I may import no more than two elephant trophies in one calendar year.

Applicant's signature

(b) (6)

Date:

03/08/2019

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

12. All international shipments must be through a designated port. A list of designated ports (where an inspector is posted) is available from [the list of designated ports](#). If you wish to use a port not listed, please contact the Office of Law Enforcement for a Designated Port Exemption Permit (form 3-200-2).

THE ROLE OF SAPA IN THE RANCH LION INDUSTRY

- Ensure legal and ethical conduct of SAPA members through:
 - SAPA Code of Conduct;
 - SAPA Norms & Standards for breeding, keeping and hunting;
 - Accreditation of lion facilities for breeding, keeping and hunting;
 - Involvement of independent professionals in evaluating compliance and facilities;
 - Identification and traceability of lions belonging to SAPA members;
- Liaise and co-operate with organizations within the wildlife ranching and hunting industry;
- Liaise and co-operate with relevant local and international legislative authorities;
- Promote internationally accepted and approved standards and conduct;
- Active involvement in conservation of lions in the wild;
- Promote conservation through sustainable utilization;
- Active involvement in local rural community upliftment, education and communal projects;
- Offer specific wildlife related training opportunities for employees within the industry;
- Actively work toward correcting incorrect perceptions about the wildlife and hunting industries;
- Conduct business with openness, integrity and transparency;
- Act decisively against any member whose conduct is not aligned to the standards upheld by SAPA; and
- Protect and ensure the survival of the *Panthera leo* specie.

SAPA

Conserving our natural heritage

Is not just a dream



SAPA

SOUTH AFRICAN
PREDATOR ASSOCIATION

Contact

P.O. Box 2618

VRVBURG

8600

SOUTH AFRICA

Tel: +27 (0)53 050 0192 / +27 (0) 83 616 8104

E-mail: sapaoffice@sapredators.co.za

Website: www.sapredators.co.za

Our office is located on the farm Brandwagf.,
Vryburg, SOUTH AFRICA

RESPONSIBLE OWNERS

RESPONSIBLE BREEDERS

RESPONSIBLE HUNTERS

WE DO NOT SUPPORT ANY KILLING



SAPA

SOUTH AFRICAN
PREDATOR ASSOCIATION

THE RANCH LION INDUSTRY





95 SAPA RANCHES

SAPA LION POPULATION OF £5 000

MEMBERS OWN £495 000 ACRES OF LAND

MEMBERS SUSTAIN £1 000 JOBS

SUPPORT RELATED INDUSTRIES



SAPA FACTS WITHIN THE RANCH LION INDUSTRY IN SOUTH AFRICA



LEGAL & LEGITIMATE



STRICTLY REGULATED

SAPA ACCREDITATION OF RANCHES

INCREASES AVAILABLE HABITAT

SURVIVAL & CONSERVATION OF SPECIES

THE ANNUAL ECONOMIC CONTRIBUTION OF THE SOUTH AFRICAN LION INDUSTRY IS R493 614 000



OFFICIAL PERMIT

113 ST ANDREW STREET
ST ANDREW BUILDING
THIRD FLOOR
BLOEMFONTEIN, 9300
FREE STATE
SOUTH AFRICA

PERMIT OFFICE
PRIVATE BAG X20801
BLOEMFONTEIN, 9300

TEL: +27 (0) 51 400 9527/26



destea
department of
economic, small business development,
tourism and environmental affairs
FREE STATE PROVINCE

PERMIT HOLDER DETAILS

ID NUMBER	87424 5101 083		
NAME	C G Botha		
PHYSICAL ADDRESS	Farm Smaldeel	POSTAL ADDRESS	P O Box 2
	Theunissen		Winburg
	9410		9410
MOBILE NUMBER:	082-565-5527		
EMAIL ADDRESS	glenda@kukama.co.za		

**THIS PERMIT IS ISSUED IN TERMS OF THE NATIONAL ENVIRONMENTAL MANAGEMENT: BIODIVERSITY ACT (10 OF 2004) (THREATENED OR PROTECTED SPECIES REGULATIONS) AND IN TERMS OF THE FREE STATE NATURE CONSERVATION ORDINANCE (8 OF 1969).
AUTHORISATION IS HEREBY GRANTED TO THE HOLDER OF THIS PERMIT TO:**

KEEP LIVE WILD ANIMALS IN CAPTIVITY

Species	Scientific name	Total
Lion 4A5F006247, 4C063B5854, 4C2B27422E, 4948432402, 4724090C4A	Panthera Leo	5
Lion 4C476F202A, 945000001369182, 945000000873989, 900115000506701	Panthera Leo	4
Lion 900115000506702, 7110350264, 7110350A01, 945000001611647, 7110350D6E	Panthera Leo	5
Lion 900085000036506, 900115000502781, 900115000506703, 900115000506704	Panthera Leo	4
Lion 900115000502782, 945000001615308, 900115000502783, 900115000502784	Panthera Leo	4
Lion 900115000502785, 900115000502814, 900115000502815, 900115000502816	Panthera Leo	4
Lion 900115000502817, 900115000502786, 900115000502819, 900115000502820	Panthera Leo	4
Lion 900115000506705, 900115000506706, 900115000502843, 900115000502844	Panthera Leo	4
Lion 900115000502845, 900115000502787, 900115000502788, 900115000502789	Panthera Leo	4
Lion 900115000502790, 900115000502791, 900115000502792, 900115000502793	Panthera Leo	4
Lion 900115000502794, 900115000502795, 900115000502796, 900115000502797	Panthera Leo	4
Lion 900115000502798, 900115000502799, 900115000502800, 900115000502801	Panthera Leo	4
Lion 900115000502802, 900115000502803, 900115000502804, 900115000502805	Panthera Leo	4
Lion 945000001869571, 945000001869572, 945000001869573, 945000001869574	Panthera Leo	4
Lion 945000001869575, 945000001869576, 945000001869577, 945000001869578	Panthera Leo	4
Lion 945000001869579, 945000001869580, 900115000506707, 900115000506708	Panthera Leo	4
Lion 900115000506709, 900115000506710, 900115000506711, 900115000506712	Panthera Leo	4
Lion 900115000506713, 900115000506714, 900115000506715, 900115000506716	Panthera Leo	4
Lion 900115000506717, 900115000506718, 900115000506719, 900115000506720	Panthera Leo	4
Lion 900115000506881, 900115000506882, 900115000506883, 900115000506884	Panthera Leo	4

The permit holder is authorised to possess the specified animal/s above, subject to the conditions at the back.

PERMIT HOLDER'S SIGNATURE 	APPROVED BY THE MEC DEPARTMENT OF ECONOMIC, SMALL BUSINESS DEVELOPMENT, TOURISM AND ENVIRONMENTAL AFFAIRS 		
EXPIRY DATE 30 May 2019 RETURN PERMIT AFTER EXPIRY	Department of Economic & Small Business Development Tourism & Environmental Affairs 08 JUN 2018 Private bag X 20801 Bloemfontein 9300 Free State Province	PERMIT NUMBER LP.0354/2018	DATE ISSUED 20/06/18

OFFICIAL PERMIT

113 ST ANDREW STREET
ST ANDREW BUILDING
THIRD FLOOR
BLOEMFONTEIN, 9300
FREE STATE
SOUTH AFRICA

PERMIT OFFICE
PRIVATE BAG X3001
BLOEMFONTEIN, 9300



destea

department of
economic, small business development,
tourism and environmental affairs
FREE STATE PROVINCE

TEL: +27 (0) 51 400 932773

PERMIT HOLDER DETAILS

ID NUMBER	87424 5101 093		
NAME	C G Botha		
PHYSICAL ADDRESS	Farm Smaaleel	POSTAL ADDRESS	P O Box 2
	Theunissen		Winburg
	9410		9410
MOBILE NUMBER:	082-566-6527		
EMAIL ADDRESS	glenda@kukama.co.za		

THIS PERMIT IS ISSUED IN TERMS OF THE NATIONAL ENVIRONMENTAL MANAGEMENT: BIODIVERSITY ACT (10 OF 2004) (THREATENED OR PROTECTED SPECIES REGULATIONS) AND IN TERMS OF THE FREE STATE NATURE CONSERVATION ORDINANCE (3 OF 1969).
AUTHORISATION IS HEREBY GRANTED TO THE HOLDER OF THIS PERMIT TO:

KEEP LIVE WILD ANIMALS IN CAPTIVITY

Species	Scientific name	Total
Lion 900115000506885, 900115000506886, 900115000506887, 900115000506888	Panthera Leo	4
Lion 900115000506889, 900115000506890, 900115000506891, 900115000506892	Panthera Leo	4
Lion 900115000506893, 900115000506894, 900115000506895, 900115000506896	Panthera Leo	4
Lion 900115000506897	Panthera Leo	1
Tiger 900115000506898, 900115000506899, 900115000506900	Panthera tigris	3

The permit holder is authorised to possess the specified animal/s above, subject to the conditions at the back.

PERMIT HOLDER'S SIGNATURE 	APPROVED BY THE MEC DEPARTMENT OF ECONOMIC, SMALL BUSINESS DEVELOPMENT, TOURISM AND ENVIRONMENTAL AFFAIRS 	
EXPIRY DATE 30 May 2019 RETURN PERMIT AFTER EXPIRY	PERMIT NUMBER LP.0354/2018	DATE ISSUED 2018/06/12

Department of Economic & Small Business
Development Tourism & Environmental Affairs

08 JUN 2018
Private bag X 2001
Bloemfontein 9300
Free State Province

RCVD MAR 28 2019

(b) (6)



3-18-19
Date

(b) (6)



CHECK ARMOR
FALSIFICATION PROTECTION

Pay to the Order of USFWS

\$ 100⁰⁰

One Hundred

Dollars

Photo Safe Deposit®
Details on back



(b) (6)



For

(b) (6)



MP



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

OMB Control No. 1018-0093
Expires Rev. 08/31/2020

Federal Fish and Wildlife Permit Application Form

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

Type of Activity:

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

RCVD APR 15 2019

LB

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

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

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

C. All applicants complete address information				
1.a. Physical address (Street address; Apartment #, Suite #, or Room #; no P.O. Boxes) (If Broker or Taxidermist is applying on behalf of a foreign national, provide Broker or Taxidermist's name and address in this block; U.S. hunters must provide their U.S. address) (b) (6)				
1.b. City Riverton	1.c. State Utah	1.d. Zip code/Postal code: (b) (6)	1.e. County/Province	1.f. Country United States
2.a. Mailing Address (include if different than physical address; include name of contact person if applicable)				
2.b. City	2.c. State	2.d. Zip code/Postal code:	2.e. County/Province	2.f. Country

D. All applicants MUST complete	
1. Attach check or money order payable to the U.S. FISH AND WILDLIFE SERVICE in the amount of \$100, nonrefundable processing fee. Federal, Tribal, State, and local government agencies, and those acting on behalf of such agencies, are exempt from the processing fee - <i>attach documentation of fee exempt status as outlined in instructions.</i> (50 CFR 13.11(d))	
2. Certification: I hereby certify that I have read and am familiar with the regulations contained in Title 50, Part 13 of the Code of Federal Regulations and the other applicable parts in subchapter B of Chapter I of Title 50, and I certify that the information submitted in this application for a permit is complete and accurate to the best of my knowledge and belief. I understand that any false statement herein may subject me to the criminal penalties of 18 U.S.C. 1001. (b) (6)	
Signature of applicant/Principal Officer for permit (No photocopied or stamped signatures)	Date of signature (mm/dd/yyyy) 04-11-2019

Please continue to next page

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

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

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

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

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

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

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

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

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

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

Weldon Noland (b) (6) Riverton Ut (b) (6)

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

Weldon Noland (b) (6)
Conservation Force, 504-837-1233, cf@conservationforce.org

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

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

No X Yes _____

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

4. For each trophy to be imported, provide:

- a. Scientific name (genus, species, and, if applicable, subspecies) and common name.
Panthera Leo genus, Species (Lion)
- b. Sex (if known). Male

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

- a. Country and place (area, region, GIS coordinates, ranch, conservancy, management area, or hunting block, AND nearest city) where wildlife is to be taken from the wild:
Zimbabwe, Matendere Ranch, Save Valley Conservancy, Nyika Province, Masivngo (nearest city)
19.992789 32.109837
- b. Date wildlife is to be hunted: August 21 2019 to Septmeber 09 2019
- b. Name of hunting outfitter, safari company, or professional hunter you will be hunting with:
Save Safaris Mike Payne

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

- a. Country and place (area, region, GIS coordinates, ranch, conservancy, management area, or hunting block, AND nearest city) where trophy was removed from the wild:
N/A
- b. Date wildlife was hunted:
- b. Name of hunting outfitter, safari company, or professional hunter you hunted with:
- c. The current location of the trophy (address and country) [the U.S. import permit will identify this country as the country of export/re-export and must match with the export/re-export document]:

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

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

Name: Mike Payne
Business Name: Save Safaris
Address: 54 Harare Dr.
City: Chisipite
State/Province: Harare
Country, Postal Code: Zimbabwe

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

- a. Do you have any information regarding the population status or trend data on the species hunted? No

- b. In order to hunt, you likely paid for licenses or trophy fees. What were those fees and do you have any information on how those funds were used by either the landowner, community, or government? Trophy fee = \$15000.00
Hunting fee = \$39600.00

Total = \$54600.00

- c. Do you have information on other funding activities that are being carried out, or were carried out, by the safari outfitter, professional hunter, concession holder, or land owner that provide a conservation benefit to the species being hunted/species hunted? No

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

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

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

Taxidermist/Broker's signature: _____ Date: _____

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

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

Applicant's signature: (b) (6) _____ Date: 04-11-2019

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

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

Conservation Force
Operator Enhancement Questionnaire

v.5/8/18

1. Name of area operator: Save Safaris
 - a. Years in business: 9 years
 - b. Name of company conducting hunt: Save Safaris
2. Name of concession: Matendere and mapari ranches Size in km²: + - 364
 - a. Land tenure: Government lease Community Private ranch Private conservancy X
 - b. Length of concession agreement: 10 years Can it be renewed? Yes No
 - c. Length of renewal, if applicable: 5 years
 - d. Estimated total amount received in trophy fees last year, if applicable: \$ 129200.00
 - e. Are there any special obligations under the concession agreement such as annual reporting, poaching control, community investment, community employment, etc.? If so, please explain:
annual aerial game count, own anti poaching units and conservancy anti poaching unit local employment where possible
 - f. Please provide the concession location and nearest city. Please attach a map or maps with the boundaries marked and showing the nearest city:
In the north of the Save Valley Conservancy. Masvingo
 - g. If the concession borders a national park, please provide the park name: N/A
 - h. Description of general and distinctive habitat features and any water features:
Mapari has the Devuli and Save Rivers as a boundary, matendere has a large dam to provide water
3. Are there any communities living in the concession? Yes No
 - a. If so, estimated number of people or villages in the concession? Nil
4. Are there communities bordering this concession? Yes No
 - a. If so, estimated number of people or villages around the concession? + - 600 people
5. Relevant game populations in the concession:¹

Species name	Relative Abundance (dense/avg./sparse)	Est. population	3-Year trend (up/down/stable)	How monitored?
Elephant	Dense	350	up	aerial surveys and
Lion	Dense	80 - 90 (M + F)	up	scouts on the ground
Leopard	Dense	60 - 70 (m + f)	up	Spoor surveys
Prey species	Dense	very large numbers	up	

6. Total employment number: 43
 - a. Please identify the number and type of all employees:
2 management, 1 camp manager, 5 camp staff, 14 anti poaching, 2 tractor drivers, 6 trackers, 13 general

¹ The new FWS import permit application form asks the applicant: "9. a. Do you have any information regarding the population status or trend on the species hunted?"

**Conservation Force
Operator Enhancement Questionnaire**

v.5/8/18

Type	Total number of this type	Number of this type who are local/from nearby communities
Professional Hunters	2	1
Trackers	6	6
Anti-poaching scouts/rangers	14	8
Other anti-poaching		
Cooks/housekeepers	5	5
Community coordinators	1	1
Managers	3	2
Biologists	0	
Others: _____	14	14

7. Number of staff employed in the off-season: 42

a. Please identify the number and type of staff that are engaged when the season is not open:

Type	Total number of this type	Number of locals/from nearby communities	When employed?
Anti-poaching staff	20	14	all year
Managers	2	2	all year
Maintenance	6	6	all year
Road opening/construction	8	8	all year
Community relations personnel	1	1	all year
Others: <u>Camp staff</u>	5	5	all year

8. Anti-poaching efforts:²

a. Number of anti-poaching staff: 14 - 20

b. Are anti-poaching patrols conducted during the hunting season, off-season, or both? both

c. Months during which anti-poaching patrols are conducted: all year

d. Number of anti-poaching patrols per month: Always a team out daily

e. Description of anti-poaching equipment, vehicles, etc.: toyota landcruiser mazda 4 x 4 pick up

f. Who is responsible for organizing and coordinating anti-poaching from prevention through successful prosecution? The managers co ordinate with the local police and National Parks

g. Do you offer rewards to poaching informants leading to arrest? Yes No

h. Do you offer rewards to poaching informants upon conviction? Yes No

i. Please describe the company's anti-poaching expenditures below. What currency are the expenditures given in? + - \$48500.00 USD on average. This year we are replacing radios and equipment so it will be higher

² The new FWS import permit application asks for activities that provide a "conservation benefit" to the species. The FWS considers anti-poaching a "conservation benefit."

**Conservation Force
Operator Enhancement Questionnaire**

v.5/8/18

Type of expense	Spending 2015	Spending 2016	Spending 2017	Remarks
Salaries for anti-poaching scouts	29120.00	30000.00	40040.00	We also contribute to the Save Valley Conservancy anti poaching unit
Equipment				
Vehicles	2130.00	2300.00	14400.00	Another vehicle purchased 2017
Petrol Diesel	3000.00	3500.00	3500.00	
Rewards paid	1000.00	400.00	600.00	
Other: _____				
Other: _____				
TOTALS				

9. Anti-poaching results:

Category	2015	2016	2017	Remarks
Poaching incidents discovered	43	26	36	
Elephant carcasses observed				nil from poaching
Lion carcasses observed				nil from poaching
Leopard carcasses observed				nil from poaching
Ivory poachers arrested				nil from poaching
Meat poachers arrested	10	8	8	
Other poachers arrested				
Poachers convicted	10	8	8	
Snares/gin traps collected	460	330	250	no gin traps
Firearms confiscated	2	0	0	muzzle loaders
Vehicles confiscated	0	0	0	
Bicycles confiscated	1	0	0	
Boats/nets confiscated	1	0	0	net
Tusks recovered	0	0	0	
Other: _____				

10. Community investment:³

- a. Does the company contribute money or goods/services to local communities? Yes No
- b. If so, what percentage or amount is shared, how often, and why (e.g., required by law, required by contract, voluntary contribution)? Voluntary donations to local clinic/school
- c. Does the company provide game meat to nearby communities? Yes No
- d. If so, please estimate the amount and/or value of meat contributed in prior year and describe the meat contribution program: If elephant trophies are hunted up to 10 ton frsh meat delivered to surrounding community
- e. If the company performs problem animal activities for surrounding communities (e.g., patrolling fields during the harvest, chasing away problem animals, conducting PAC hunts or PAC killings), please describe. PAC lion and elephant shot and chased back to the SVC. Occasionally lion darted and returned to SVC. PAC is a weekly occurance and lion pressure on the cattle around the svc is big

³ The new FWS import permit application asks for activities that provide a "conservation benefit" to the species. The FWS considers community investment a "conservation benefit."

**Conservation Force
Operator Enhancement Questionnaire**

v.5/8/18

f. Please describe any consolation payments made to local residents damaged by game species. What currency are the expenditures reported in? Nil

Species	Damage caused	Consolation paid 2015	Consolation paid 2016	Consolation paid 2017
Elephant	SVC policy is not to pay compensation. Where possible to help with PAC or to chase the animals back into			
Lion	the conservancy			
Leopard				
Other				

g. Please describe any community projects paid for by the company. What currency are the expenditures reported in? USD

Type of project	Spending 2015	Spending 2016	Spending 2017	Remarks
Education (e.g., classrooms, offices)	Across the whole SVC around \$50000.00 per year in donor and own funding			
Education (e.g., school fees, supplies)	as above			
Health (e.g., clinics, offices)	Donation of meat and medical supplies like bandages, maternity pads etc			
Health (e.g., medical salaries, equipment)				
Community scout salaries				
Other community anti-poaching	500	600	600	Payments to informers
Local government activities				
Water infrastructure improvements				
Sports teams funded	Soccer balls donated			
Construction materials donated	15000.00			Help with building a dam
Other: _____				
Other: _____				
TOTALS				

11. How many U.S. clients did the company have in the past three years, what percentage of the company's clients were from the U.S., and what fees did they pay? 90% from the US

	Hunting elephant	Hunting lion	Hunting leopard	Hunting all species
Number of U.S. clients	2015: 2 2016: 2 2017: 0	2015: 1 2016: 1 2017: 2	2015: 4 2016: 3 2017: 4	2015: 18 2016: 14 2017: 19
Percentage of U.S.	2015:	2015:	2015:	2015:

**Conservation Force
Operator Enhancement Questionnaire**

v.5/8/18

clients	2016: 2017:	2016: 2017:	2016: 2017:	2016: 2017:
Trophy fees paid by U.S. clients	2015: 440000 2016: 312000 2017: 410000	2015: 2016: 2017:	2015: 2016: 2017:	2015: 2016: 2017:

12. Approximate dollar amount and/or percentage of the company's revenue from U.S. clients:
90%

13. Other information: Please provide a narrative of other enhancement information about the operation, such as any special hunting policies (e.g., aging, size, resting areas), concession improvements (e.g., digging and maintaining boreholes, restocking), management activities, research, etc.

14. I declare that the foregoing is true and correct.

Signature:  _____

Name: Melanie Payne Title: Public Officer

All trophies are aged by G Connear who is employed by the SVC. This has been ongoing for more than 10 years and quota is based on the number of animals hunted the previous year that are of the minimum recommended age or older. Penalty's on quota if underage animals are hunted. All properties on the SVC have water points fed either from boreholes or dams built by the concession holders. There is a number of research teams on the conservancy that study all the properties, there is the African wild dog foundation, large carnivore research done in conjunction with road counts for spoor and the Lowveld rhino trust that monitor the black and white rhino populations as well as provide assistance with anti poaching resources. There is also the Special Species Protection Unit which is paid for the by SVC and donors which does anti poaching with special emphasis on pangolins, rhino and elephant. This includes the use of a microlight, dog unit and several vehicles and motorbikes.

(b) (6)

(b) (6)

† LICENSED IN TEXAS
° LICENSED IN MISSISSIPPI
◊ LICENSED IN NEW YORK
◩ LICENSED IN PENNSYLVANIA
£ LICENSED IN OKLAHOMA
µ LICENSED IN ILLINOIS

(b) (6)

(b) (6)

In Reply Refer to: FWS/AIA/DMA/PRT-02378D – Reconsideration

US Fish & Wildlife Service
5275 Leesburg Pike, MS:IA
Falls Church VA 22041-3803

Dear Mary Cogliano, Chief:

This letter is in response to your denial for my request of a permit number to import a sport-hunted trophy of one lion (*Panthera leo melanochaita*) I am requesting a reconsideration of my application on the below bases.

After reviewing your reply, it was brought to my attention that we had the incorrect permits and information on my application and after conferring with my guides I was able to obtain the correct permits that have been submitted and approved by the parks. I have also been advised that they reached out to USFW confirming that all the permits are now in the appropriate order. Please review the corrected information attached.

If you have any questions you can reach me at (b) (6) cell (b) (6) office or via email to (b) (6) additionally Christina Nicklas my office manger may also be able to help you with any questions, she can be reached at (b) (6) office or (b) (6)

Sincerely,
(b) (6)

Jason C. Webster

Enclosures



**Department of Interior
U.S. Fish and Wildlife Service
Federal Fish and Wildlife Permit Application Form**

Type of Activity

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

**IMPORT OF SPORT-HUNTED TROPHIES under Appendix I of
the Convention on International Trade in Endangered
Species (CITES) and/or U.S. Endangered Species Act (ESA)**

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

Section A: Complete if applying as an individual

1.a. Last Name Webster	1.b. First Name Jason	1.c. Middle Name/Initial C	1.d. Suffix
2. Date of Birth (mm/dd/yyyy)	3. Telephone Number	3.a. Alternate Telephone Number	4. E-mail address

Section B: Complete if applying on behalf of a business, corporation, public agency, Tribe, or institution

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

Section C: All applicants complete address information

1.a. Physical address (Street address, Apartment #, Suite #, or Room #; no P.O. Boxes)				
(b) (6)				
1.b. City Houston	1.c. State Texas	1.d. Zip code/Postal code (b) (6)	1.e. County/Province	1.f. Country USA
2.a. Mailing address (include if different than physical address; include name of contact person if applicable)				
2.b. City	2.c. State	2.d. Zip code/Postal code	2.e. County/Province	2.f. Country

Section D: All applicants MUST complete

<p>1. Attach the nonrefundable application processing fee in the form of a check or money order payable to the U.S. FISH AND WILDLIFE SERVICE in the amount of \$100. Federal, Tribal, State, and local government agencies, and those acting on behalf of such agencies, are exempt from the processing fee—attach documentation of fee exempt status as outlined in instructions [50 CFR 13.11(d)].</p> <p>2. Certification: I hereby certify that I have read and am familiar with the regulations contained in Title 50 Part 13 of the Code of Federal Regulations and the other applicable parts in subchapter B of Chapter I of Title 50, and I certify that the information submitted in this application for a permit is complete and accurate. I understand that any false statement herein may subject me to the criminal penalties of 18 U.S.C. 1001.</p>	<p align="center">(b) (6)</p> <p align="center">4-15-19</p>
Signature _____ Date of signature (mm/dd/yyyy)	
Please continue to next page	

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

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

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

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

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

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

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

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

Please provide the following information. Complete all questions on the application. Mark questions that are not applicable with "N/A". If needed, use a separate sheet of paper. On all attachments or separate sheets you are submitting; please indicate the application question number you are addressing. If applying for more than one trophy, be sure to answer questions 4-6 for each trophy addressed in this application. If importing trophies from more than one country, you must submit a separate application for each shipment in order to obtain separate import permits.

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

Same as page 1

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

Same as applicant or Christina Nicklas (b) (6)

3. Disqualification factor. A conviction, or entry of a plea of guilty or nolo contendere, for a felony violation of the Lacey Act, the Migratory Bird Treaty Act, or the Bald and Golden Eagle Protection Act disqualifies any such person from receiving or exercising the privileges of a permit, unless such disqualification has been expressly waived by the Service Director in response to a written petition. (50 CFR 13.21(c)) Have you or any of the owners of the business, if applying as a business, been convicted, or entered a plea of guilty or nolo contendere, forfeited collateral, or are currently under charges for any violations of the laws mentioned above?

No Yes

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

4. For each trophy to be imported, provide:

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

Lion - Leo Melanochaita

b. Sex (if known). Male

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

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

b. Date wildlife is to be hunted:

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

6. **IF THE TROPHY HAS ALREADY BEEN TAKEN**, please enter the following information:

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

Upper Lupande, GPS Coordinates 13.00598, 32.08455

b. Date wildlife was hunted:

July 21, 2018 - Aug 10, 2018

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

Westgate Properties Ltd

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

Mike Borman, Bangweulu Taxidermy Limited, 4142/K Chidwema Rd New Kasama Lusaka Zambia

7. Please provide a copy of any applicable foreign government permits or licenses that were required to remove this animal from the wild (if you have not hunted yet and do not currently hold any such permits or licenses, please indicate so).
8. Complete name and address of overseas person or business shipping the trophy to you. If you are applying to import a trophy directly from **Namibia**, you must provide the name and address of the professional hunter listed on your Namibian hunting permit [this name will appear on the face of the export permit].
Name: Mike Borman
Business Name: Bangweulu Taxidermy Limited
Address: 4142/K Chifwema Road
City: New Kasama
State/Province: Lusaka, Zambia
Country, Postal Code:
9. For species listed under the U.S. Endangered Species Act, please be aware that the U.S. Fish and Wildlife Service (Service) must make a finding that your activities will enhance or benefit wild populations of the species involved. While we will communicate with the range country for the species you will hunt or hunted when making the required findings, if you have any information that could support this finding, it would be helpful for our review if you could provide it. Please submit such information on a separate page with your application.
- a. Do you have any information regarding the population status or trend data on the species hunted?
Unknown
- b. In order to hunt, you likely paid for licenses or trophy fees. What were those fees and do you have any information on how those funds were used by either the landowner, local community, or government?
Unknown
- c. Do you have information on other funding activities that are being carried out, or were carried out, by the safari outfitter, professional hunter, concession holder, or landowner that provide a conservation benefit to the species being hunted/species hunted?
Unknown

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

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

I acknowledge that the sport-hunted trophy/trophies to be imported has been/will be personally hunted by my client and is being imported only for my client's personal use (i.e., not for sale, transfer, donation, or exchange that is reasonably likely to result in economic use, gain, or benefit). If applying for the import of an elephant trophy, I understand that my client may import no more than two elephant trophies in one calendar year.

Taxidermist/Broker's signature: _____ Date: _____

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

I acknowledge that the sport-hunted trophy/trophies to be imported has been/will be personally hunted by me and is being imported only for my personal use (i.e., not for sale, transfer, donation, or exchange that is reasonably likely to result in economic use, gain, or benefit). If applying to import an elephant trophy, I understand that I may import no more than two elephant trophies in one calendar year.

Applicant's signature: (b) (6) _____ Date: 4-15-19

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

12. All international shipments must be through a designated port. A list of designated ports (where an inspector is posted) is available from **the list of designated ports**. If you wish to use a port not listed, please contact the Office of Law Enforcement for a Designated Port Exemption Permit (form 3-200-2).

ORIGINAL

0001618

S/No



REPUBLIC OF ZAMBIA
The Zambia Wildlife Act
(No. 14 of 2015)
(Licences and Fees) Regulations, 2007
(Regulation 7(5))

RECORD OF GAME AND/OR PROTECTED ANIMALS KILLED OR WOUNDED

Name of Professional Hunter: M. G. Mwanika NRC/Passport No: (b) (6)
Residential Address: (b) (6) LEPPAOS HILL, LUSAKA
Name of Safari Company on behalf of which the Professional Hunter is submitting this return: WESTGATE PROPERTIES
DETAILS OF CLIENT
Name of client: J. WEBSTER NRC/Passport No: (b) (6)
Tel/Mobile No: 90 WESTGATE Nationality: USA
Postal Address: 90 WESTGATE Residential Address: 6403 WHITEHALL LANE, PUNNARD, TX, USA
Type of Licence: CLASSIC Licence No.: 0000666
Date of Issue: 13/7/18 Place of Issue: G.MILANDA
Name of Hunting Block where hunting was conducted: UPPER LUPANDE
Hunting period From: 20/7/18 To: 11/8/18

Date Killed or wounded	Species	Sex	Number killed	Number Wounded	GPS Location	Trophy for export		Foreign currency value charged to client
						Yes	No	
7/8/18	LION	M	1		13-00548 32-03455	✓		LION 0000607

DETAILS OF TROPHY MEASUREMENTS

Species	Length of Skin	Length of Tusk	Average length of horn	Length of Skull
LION				23 3/4"

Certification by -

(a) Client

I certify that the animals listed on this return were hunted or wounded by me during the period stated and that the total amount of foreign currency stated and paid by me to the safari company is the full amount I was charged.

(b) Professional Hunter

I certify that the animals listed in this return were actually hunted by the client in accordance with the terms and conditions of the Safari Hunting Licence and that the amount paid by the client for the hunt is the full amount stated above is the full amount paid by the client for the hunt.

Date: 11/8/18

Date: 11/8/18

Date: 11/8/18

Signature of Client: (b) (6)

Signature of Professional Hunter: (b) (6)

Name of Wildlife Police Officer: NAMECK MWALA

Employment No. of W.P.O.: 27715

Signature of W.P.O.: (b) (6)

Notes: Original copy to Committee ** Duplicate to Safari Company ** Triplicate to Commercial ** Quadruplicate to be retained in the book

(b) (6)

88-1198
1131 63

(b) (6)

DATE 4/15/2019



PAY TO THE
ORDER OF

U.S. Fish & Wildlife Services \$ 100 —

one hundred & 00/100

DOLLARS



Security Features
Included.
Details on Back.



CommunityBank
OF TEXAS

www.communitybankoftx.com

(b) (6)

MEMO

app to Permit

MP

(b) (6)



RCVD APR 23 2019

**Department of Interior
U.S. Fish and Wildlife Service
Federal Fish and Wildlife Permit Application Form**

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

Type of Activity

**IMPORT OF SPORT-HUNTED TROPHIES under Appendix I of
the Convention on International Trade in Endangered
Species (CITES) and/or U.S. Endangered Species Act (ESA)**

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

Section A: Complete if applying as an individual

1.a. Last Name <i>WEATHERBY</i>	1.b. First Name <i>JEFFERY</i>	1.c. Middle Name/Initial <i>LEE</i>	1.d. Suffix
------------------------------------	-----------------------------------	--	-------------

(b) (6)

Section B: Complete if applying on behalf of a business, corporation, public agency, Tribe, or institution

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

Section C: All applicants complete address information

1.a. Physical address (Street address, Apt. #, Suite #, or P.O. Box) (b) (6)					
1.b. City <i>Big Lake</i>	1.c. State <i>Tx.</i>	1.d. Zip code/Postal code (b) (6)	1.e. County/Province	1.f. Country <i>U.S.A.</i>	
2.a. Mailing address (include if different than physical address; include name of contact person if applicable)					
2.b. City	2.c. State	2.d. Zip code/Postal code	2.e. County/Province	2.f. Country	

Section D: All applicants MUST complete

1. Attach the nonrefundable application processing fee in the form of a check or money order payable to the U.S. FISH AND WILDLIFE SERVICE in the amount of \$100 . Federal, Tribal, State, and local government agencies, and those acting on behalf of such agencies, are exempt from the processing fee—attach documentation of fee exempt status as outlined in instructions [50 CFR 13.11(d)].
2. Certification: I hereby certify that I have read and am familiar with the regulations contained in Title 50 Part 13 of the Code of Federal Regulations and the other applicable parts in subchapter B of Chapter I of Title 50 , and I certify that the information submitted in this application for a permit is complete and accurate to the best of my knowledge and belief. I understand that any false statement herein may subject me to the criminal penalties of 18 U.S.C. 1001.
Sign: (b) (6) _____ Date of signature (mm/dd/yyyy) <i>04/16/2019</i> (Do not photocopy or stamp signatures)
Please continue to next page

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

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

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

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

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

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

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

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

Please provide the following information. Complete all questions on the application. Mark questions that are not applicable with "N/A". If needed, use a separate sheet of paper. On all attachments or separate sheets you are submitting; please indicate the application question number you are addressing. If applying for more than one trophy, be sure to answer questions 4-6 for each trophy addressed in this application. If importing trophies from more than one country, you must submit a separate application for each shipment in order to obtain separate import permits.

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

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

Jeff Weatherby (b) (6)

3. Disqualification factor. A conviction, or entry of a plea of guilty or nolo contendere, for a felony violation of the Lacey Act, the Migratory Bird Treaty Act, or the Bald and Golden Eagle Protection Act disqualifies any such person from receiving or exercising the privileges of a permit, unless such disqualification has been expressly waived by the Service Director in response to a written petition. (50 CFR 13.21(c)) Have you or any of the owners of the business, if applying as a business, been convicted, or entered a plea of guilty or nolo contendere, forfeited collateral, or are currently under charges for any violations of the laws mentioned above?

No Yes

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

4. For each trophy to be imported, provide:

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

Panthera Leo - Lion

b. Sex (if known). *Male*

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

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

N.A.

b. Date wildlife is to be hunted:

N.A.

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

N.A.

6. **IF THE TROPHY HAS ALREADY BEEN TAKEN**, please enter the following information:

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

*Mapungubwe Game Reserve
Vhembe, Limpopo, Allday, Republic of South Africa.*

b. Date wildlife was hunted: *06/24/2017 thru 07/14/2017*

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

*Eugene Small
Mapungubwe Game Reserve*

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

*Universal Trophy Services CC
P.O. Box 11526, Tiegerpoort
Plot 114 Bushwera
Pretoria, Gauteng, Republic of South Africa 0056*

7. Please provide a copy of any applicable foreign government permits or licenses that were required to remove this animal from the wild (if you have not hunted yet and do not currently hold any such permits or licenses, please indicate so). *included*
8. Complete name and address of overseas person or business shipping the trophy to you. If you are applying to import a trophy directly from **Namibia**, you must provide the name and address of the professional hunter listed on your Namibian hunting permit [this name will appear on the face of the export permit].
Name: *Rupert Inkinde*
Business Name: *Universal Trophy Services CC*
Address: *P.O. Box 11526, Tiegerpoort, Plot 114 Bushwera 0056*
City: *Pretoria*
State/Province: *Gauteng*
Country, Postal Code: *Republic of South Africa*
9. For species listed under the U.S. Endangered Species Act, please be aware that the U.S. Fish and Wildlife Service (Service) must make a finding that your activities will enhance or benefit wild populations of the species involved. While we will communicate with the range country for the species you will hunt or hunted when making the required findings, if you have any information that could support this finding, it would be helpful for our review if you could provide it. Please submit such information on a separate page with your application.

- a. Do you have any information regarding the population status or trend data on the species hunted?
This was an old lion (estimated 12-13 years old) that was out of the pride, accompanied by an old, barren lioness.
- b. In order to hunt, you likely paid for licenses or trophy fees. What were those fees and do you have any information on how those funds were used by either the landowner, local community, or government?
\$50,000⁰⁰. Money was used for habitat improvement, cameras to study lion movement and to fund aerial game counts.
- c. Do you have information on other funding activities that are being carried out, or were carried out, by the safari outfitter, professional hunter, concession holder, or landowner that provide a conservation benefit to the species being hunted/species hunted?
See b. above

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

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

I acknowledge that the sport-hunted trophy/trophies to be imported has been/will be personally hunted by my client and is being imported only for my client's personal use (i.e., not for sale, transfer, donation, or exchange that is reasonably likely to result in economic use, gain, or benefit). If applying for the import of an elephant trophy, I understand that my client may import no more than two elephant trophies in one calendar year.

Taxidermist/Broker's signature: _____ Date: _____

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

I acknowledge that the sport-hunted trophy/trophies to be imported has been/will be personally hunted by me and is being imported only for my personal use (i.e., not for sale, transfer, donation, or exchange that is reasonably likely to result in economic use, gain, or benefit). If applying to import an elephant trophy, I understand that I may import no more than two elephant trophies in one calendar year.

Applicant's signature (b) (6) _____ Date: 04/16/2019

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

- 12. All international shipments must be through a designated port. A list of designated ports (where an inspector is posted) is available from [the list of designated ports](#). If you wish to use a port not listed, please contact the Office of Law Enforcement for a Designated Port Exemption Permit (form 3-200-2).



ORDINARY PERMIT

PERMIT NUMBER: O No 12028

(Issued in terms of the provisions of the National Environmental Management Biodiversity Act 2004, Act 10 of 2004)

NAME	LEDET.
ADDRESS	30 Mr. D. Munnika Avenue EQUISTICHAT ST.
PROVINCE	LIMPOPO

DETAILS OF PERMIT HOLDER	
NAME	JEFFERY LEE WEATHERBY
SURNAME	WEATHERBY
POSTAL ADDRESS	
RESIDENTIAL ADDRESS	(b) (6)
ADDRESS	(b) (6)
ADDRESS	BIG LAKE TEXAS
ADDRESS	N/A.
TOWN	TEXAS
POSTAL CODE	(b) (6)
PROVINCE	USA

PROPERTY WHERE RESTRICTED ACTIVITIES WILL BE CARRIED OUT	
NAME AND SURNAME OF APPLICANT	Mr. J. L. Weatherby
NAME AND SURNAME: RESPONSIBLE PERSON	Mr. E. Small
NAME AND SURNAME OF AGENT	N/A.
PHYSICAL ADDRESS OF FACILITY	MAPUNGUBWE GAME RESERVE
PHYSICAL ADDRESS OF FACILITY	ALLDAYS
DISTRICT	NHEMBE
PROVINCE	LIMPOPO
REGISTERED NAME AND NUMBER (in the case of game farm)	MAPUNGUBWE GAME RESERVE

DETAILS OF SPECIES INVOLVED				
COMMON NAME	SCIENTIFIC NAME	SEX (if known)	QUANTITY	MARKING (if applicable)
LION	Panthera leo	MALE	001(001)	

DETAILS OF RESTRICTED ACTIVITIES INVOLVED	
TO HUNT ONE MALE LION ON THE PROPERTY - MAPUNGUBWE GAME RESERVE - ALLDAYS - NHEMBE - LIMPOPO BY AN OVERSEAS CLIENT FROM USA - Mr. J. L. WEATHERBY.	

NAME AND SURNAME OF PURCHASER/SELLER	
RESIDENTIAL ADDRESS OF PURCHASER/SELLER	

IN THE CASE OF INTERNATIONAL IMPORT/EXPORT:	
NAME AND SURNAME OF CONSIGNEE/CONSIGNOR	
RESIDENTIAL ADDRESS OF CONSIGNEE/CONSIGNOR	

IN THE CASE OF A HUNT:	
NAME AND SURNAME OF HUNTING CLIENT (if applicable)	Mr. J. L. Weatherby
NAME AND SURNAME OF PROFESSIONAL HUNTER (if applicable)	Mr. E. Small
NAME AND SURNAME OF HUNTING OUTFITTER (if applicable)	Mr. E. Small
WEAPON AND METHOD OF HUNTING	PIC - VIKING
BASE CIRCUMFERENCE OF ELEPHANT IVORY OR RHINOCEROS HORN	
WEIGHT OF EACH PIECE APPLIED FOR	VIKING - KYRILLASIK
IN THE CASE OF POSSESSION OF ELEPHANT IVORY OR RHINOCEROS HORN:	
WEIGHT OF EACH PIECE APPLIED FOR	
LENGTH OF THE ELEPHANT IVORY	
BASE CIRCUMFERENCE OF ELEPHANT IVORY OR RHINOCEROS HORN	
REGISTRATION NUMBER	(b) (6)
SIGNATURE OF ISSUING OFFICER:	SIGNATURE OF PERMIT HOLDER:
PERIOD OF VALIDITY FROM: 19/06/2017 TO: 19/07/2017	
RECEIPT NUMBER 1095325 - 2017	
SIGNATURE OF ISSUING OFFICER: Dalea SF.	(b) (6)

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2017-06-19



CONVENTION ON INTERNATIONAL TRADE IN ENDANGERED SPECIES OF WILD FAUNA AND FLORA

EXPORT
 RE-EXPORT
 IMPORT
 OTHER

ORIGINAL

2. Valid until 09/03/2018

3. Importer (name and address)
 Jeff Lee, Weatherby
 (b) (6)
 Big Lake (b) (6) TEXAS USA

4. Exporter / Re-exporter (name, address and country)
 Universal Trophy Services CC
 Plot 114 Bashewa
 0056 PRATORIA RSA

3a. Country of import USA

5. Special conditions
 (Invalid without attached permit conditions page 2012)
 Integrated permit doc attached

6. Name, address, national seal / stamp and country of Management Authority
 Department of Environmental Affairs
 Private Bag X447
 PRETORIA
 0001
 SOUTH AFRICA



5a. Purpose of the transaction (see reverse) H
 5b. Security stamp No. 1367786

7.8 SCIENTIFIC NAME (genus and species) AND COMMON NAME OF ANIMAL OR PLANT	9. Description of specimens, including identifying marks or numbers (age/sex) if live	10. Appendix No. and source (see reverse)	11. Quantity (including unit)	11a. Total exported / quota
A (Panthera leo) Lion	Skull	11C	1 (one)	11a.
B (Panthera leo) Lion	Full skin	11C	1 (one)	11a.
C				
D				

* Country in which the specimens were taken from the wild, bred in captivity or artificially propagated (only in case of re-export)
 ** Only for specimens of Appendix I species bred in captivity or artificially propagated for commercial purposes
 *** For Pre-Convention specimens

13. THIS PERMIT / CERTIFICATE IS ISSUED BY:
 LA Lötter
 Pretoria 10/10/2017

GAUTENG PROVINCIAL GOVERNMENT
 DEPARTMENT OF AGRICULTURE AND RURAL DEVELOPMENT
 10 OCT 2017
 DIRECTORATE OF CONSERVATION PERMITS OFFICE
 P.O. BOX 8769, JOHANNESBURG 2000

14. EXPORT ENDORSEMENT:

Block	Quantity
A	
B	
C	
D	

15. Bill of Lading/Air Waybill Number:
 Port of Export: _____ Date: _____
 Signature: _____ Official stamp and title: _____

INTEGRATED PERMIT NO.: 205629

This is an integrated permit for species listed in the CITES- and Threatened or Protected Species Regulations under the National Environmental Management: Biodiversity Act, 2004 (Act 10 of 2004).



Signature

GAUTENG PROVINCIAL GOVERNMENT
DEPARTMENT OF AGRICULTURE
AND RURAL DEVELOPMENT
Date:
10 OCT. 2017
DIRECTORATE OF CONSERVATION
PERMITS OFFICE
P.O. BOX 8769, JOHANNESBURG 2000

PERMIT CONDITIONS FOR THE NATIONAL/ INTERNATIONAL IMPORT, EXPORT OR RE-EXPORT OF CITES AND NON-CITES SPECIES AND ANY PRODUCTS THEREOF; NON-CITES LIVE WILD ANIMALS, LIVE EXOTIC ANIMALS, HUNTING TROPHIES, WILD ANIMAL PRODUCTS, PROTECTED PLANTS AND LIVE FISH

These conditions will be applicable to all National/ International Imports, Exports and Re-Exports of CITES and Non-CITES species and any products thereof; live wild animals, live exotic animals, hunting trophies, wild animal products, protected plants and live fish by air, mail, rail and road within the Gauteng Province of which the first port of entry into and/ or the last port of exit out of the Province of Gauteng/ South Africa will be OR Tambo International Airport.

Import permits are not valid unless the imported consignment is accompanied by a valid original export permit from the country/ province of origin (if required), which must be handed to the authorized Environmental Management Inspector on inspection.

THE FOLLOWING CONDITIONS ARE APPLICABLE TO:

(A) ALL NATIONAL/ INTERNATIONAL IMPORTS, EXPORTS AND RE-EXPORTS OF CITES AND NON-CITES SPECIES AND ANY PRODUCTS THEREOF; LIVE WILD ANIMALS, LIVE EXOTIC ANIMALS, HUNTING TROPHIES, WILD ANIMAL PRODUCTS, PROTECTED PLANTS AND LIVE FISH (INCLUDING AIR, MAIL, RAIL, ROAD)

THIS PERMIT:

1. Shall not be transferable;
 - a) Shall be invalid until the signature of the holder/ Recipient thereof been appended thereto;
 - b) This permit is not valid unless it has been endorsed and released by an authorized Environmental Management Inspector/ official prior to the import, export or re-export taking place. In cases of importation of live animals, which are to be quarantined at OR Tambo International Airport's Quarantine Station, the permit must be released prior to the animals leaving quarantine. Original import permits to be inserted into a sealed envelope and placed in the Environmental Management Inspector box that's provided at the quarantine station, no more than 14 working days after import.
 - c) Shall be subject to the provisions of any other law and or regulation;
 - d) Shall be valid for one consignment only;
 - e) This permit is subject to the compliance of Veterinary and Agricultural requirements; and to the compliance of IATA Live Animal Regulations.
2. The permit holder or his delegated-agent must contact one of the authorized Environmental Management Inspector/ officials, per telephone and confirm per fax a minimum of 48 hours prior to the import, export or re-export taking place to book an inspection (the inspection booking must be requested a minimum of 48 hours prior to the intended inspection), applicable for shipments done over weekends and public holidays, with the following information:
 - a) Name / Company Name of Importer / Exporter;
 - b) Name of Airline and Warehouse where intended inspection will take place;
 - c) Date and Time of Import / Export / Re-Export;
 - d) Date and Time of intended inspection (subject to approval);
 - e) Agents particulars (if applicable), Carrier Name, Flight Number, Flight Time and Waybill Number;
 - f) The applicable permit number/s and relevant expiry dates; and
 - g) Detailed packing list as per condition 7.
3. Inspections are by appointment only and early booking is necessary. An authorized Environmental Management Inspector/ official may be contacted at the following telephone numbers during office hours (07:00 – 15:30):
 Office: +27 (11) 390-3687/ 2311
 Fax: +27 (11) 390-1720
4. All relevant documentation, including original permits (CITES permits must include original and coloured copy), Packing List/s, Waybill/s and Bill of entry/s (SAD/ DA 550) must be presented for inspection. A photo copy of all these documents must also be handed to the Environmental Management Inspector/ official on inspection. The original permit/s, these conditions and packing list/s must accompany the consignment/s.
5. All transport containers must be numbered and the numbers must coincide with the numbers on the packing list/s. The country/ province of destination as shown on the containers must coincide with the country/ province of destination as on the permit. The details on the packing list/s must coincide with the details on the permit/s and Waybill/s.
6. Detailed packing list/s, that are signed and dated must accompany the consignment/s, with the following information:
 - a) Details of Importer and Exporter (Names, addresses and contact numbers);
 - b) Waybill number/s and name of carrier, flight number, date and time;
 - c) Transport container number/s;
 - d) Scientific name of species (In full) with relevant transponder / tag / ring numbers; a detailed description of specimen / product and the origin thereof;
 - e) Common name of species (In full);
 - f) Number per species per container (actual number exported / imported); and
 - g) Applicable permit number/s
7. If this permit is not used, the original permit (CITES permits must include coloured copy) must be returned to the issuing authority within 14 working days after expiry thereof. Import permits must be returned to the issuing authority within 14 working days after use. Export permits must be handed to a Management Authority of the importing country/ province within 14 working days after use.
8. The permit holder must make and retain photo copies of permit/s for audit inspections. Copies of import permits must be made and retained after endorsement, for Re-export permit applications. When applying for a Re-export permit, a copy of the endorsed import permit must be submitted to the Permit office with the application.
9. Only A person authorized thereto by the Premier or Minister may make any alteration on the permit.
10. Failure to comply with any of the permit conditions renders the permit invalid and may result in criminal proceedings, cancellation of the permit/s and seizure of the consignment/s.
11. The holder of the permit and / or his/ her delegated agent will be held responsible for any legal costs; costs incurred for delays and / or storage fees due to irregularities and / or due to the consignment being withheld due to incorrect documentation, and / or incorrect consignment/s and / or failure to comply with permit conditions.
12. Permit holders or their delegated agents must inform the Environmental Management Inspector/ official if an inspection is cancelled, or if they are to be late for an inspection within a reasonable time before the inspection is due to take place.

Signature of Issuing Officer
 LA. Lotter

GAUTENG PROVINCIAL GOVERNMENT
 DEPARTMENT OF AGRICULTURE
 10 OCT 2017
 Date
 DIRECTORATE OF CONSERVATION
 PERMITS OFFICE
 Full Name
 P.O. BOX 8769, JOHANNESBURG 2000

Signature of Recipient _____ Date _____
 Full Name _____

RCVD APR 23 2019

(b) (6)

88-2127/1113

(b) (6)

DATE

4-16-19

PAY TO
THE ORDER OF

U.S. Fish + Wildlife Service \$ 100.00

one hundred and 00/100

DOLLARS



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included.
Details on Back.



SECURITY BANK

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Member FDIC

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Lion permit

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(b) (6)



APR 23 2019

**Department of Interior
U.S. Fish and Wildlife Service
Federal Fish and Wildlife Permit Application Form**

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

Type of Activity

IMPORT OF SPORT-HUNTED TROPHIES under Appendix I of the Convention on International Trade in Endangered Species (CITES) and/or U.S. Endangered Species Act (ESA)

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

Section A: Complete if applying as an individual

1.a. Last Name PATTERSON	1.b. First Name DENNIS	1.c. Middle Name/Initial E	1.d. Suffix
2. Date of Birth (mm/dd/yyyy) (b) (6)	2. Telephone Number	2.a. Alternate Telephone Number	4. E-mail Address

Section B: Complete if applying on behalf of a business, corporation, public agency, Tribe, or institution

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

Section C: All applicants complete address information

1.a. Physical address (Street address; Apartment #, Suite #, or Room #: no P.O. Boxes) (b) (6)					
1.b. City TRUSSVILLE	1.c. State ALABAMA	1.d. Zip code/Postal code (b) (6)	1.e. County/Province	1.f. Country USA	
2.a. Mailing address (include if different than physical address; include name of contact person if applicable) SAME					
2.b. City	2.c. State	2.d. Zip code/Postal code	2.e. County/Province	2.f. Country	

Section D: All applicants MUST complete

1. Attach the nonrefundable application processing fee in the form of a check or money order payable to the U.S. FISH AND WILDLIFE SERVICE in the amount of \$100 . Federal, Tribal, State, and local government agencies, and those acting on behalf of such agencies, are exempt from the processing fee—attach documentation of fee exempt status as outlined in instructions [50 CFR 13.11(d)].
2. Certification: I hereby certify that I have read and am familiar with the regulations contained in Title 50 Part 13 of the Code of Federal Regulations and the other applicable parts in subchapter B of Chapter I of Title 50 , and I certify that the information submitted in this application for a permit is complete and true. My false statement herein may subject me to the criminal penalties of 18 U.S.C. 1001. (b) (6)
Signature: (b) (6) Date of signature (mm/dd/yyyy) 2-20-19 02/29/2019

Please continue to next page

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

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

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

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

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

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

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

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

Please provide the following information. Complete all questions on the application. Mark questions that are not applicable with "N/A". If needed, use a separate sheet of paper. On all attachments or separate sheets you are submitting; please indicate the application question number you are addressing. If applying for more than one trophy, be sure to answer questions 4-6 for each trophy addressed in this application. If importing trophies from more than one country, you must submit a separate application for each shipment in order to obtain separate import permits.

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

SAME

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

ME

3. Disqualification factor. A conviction, or entry of a plea of guilty or nolo contendere, for a felony violation of the Lacey Act, the Migratory Bird Treaty Act, or the Bald and Golden Eagle Protection Act disqualifies any such person from receiving or exercising the privileges of a permit, unless such disqualification has been expressly waived by the Service Director in response to a written petition. (50 CFR 13.21(c)) Have you or any of the owners of the business, if applying as a business, been convicted, or entered a plea of guilty or nolo contendere, forfeited collateral, or are currently under charges for any violations of the laws mentioned above?

No Yes

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

4. For each trophy to be imported, provide:

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

PANTHERA LEO

b. Sex (if known). *MALE*

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

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

SOUTH AFRICA: BOSS SAFARIS IT'S A PRIVATELY-OWNED 6,000 ACRE HIGH-FENCE RANCH, THERE NO PHYSICAL ADDRESS BUT ILL BE HUNTING NEAR LICHTENBURG, S.A.

b. Date wildlife is to be hunted:

OCTOBER 6-13, 2019

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

BOSS SAFARIS

6. IF THE TROPHY HAS ALREADY BEEN TAKEN, please enter the following information:

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

N/A

b. Date wildlife was hunted:

- c. Name of hunting outfitter, safari company, or professional hunter you hunted with:
- d. The current location of the trophy (address and country) [the U.S. import permit will identify this country as the country of export/re-export and must match with the foreign export/re-export document]:
7. Please provide a copy of any applicable foreign government permits or licenses that were required to remove this animal from the wild (if you have not hunted yet and do not currently hold any such permits or licenses, please indicate so). *I HAVENIT BEEN HUNTING YET, SO I HAVE NO LICENSES OR PERMITS.*
8. Complete name and address of overseas person or business shipping the trophy to you. If you are applying to import a trophy directly from **Namibia**, you must provide the name and address of the professional hunter listed on your Namibian hunting permit [this name will appear on the face of the export permit].
 Name: *NOT YET DETERMINED, BUT I'LL GET IT LATER*
 Business Name: *IF THIS IS APPROVED.*
 Address:
 City:
 State/Province:
 Country, Postal Code:
9. For species listed under the U.S. Endangered Species Act, please be aware that the U.S. Fish and Wildlife Service (Service) must make a finding that your activities will enhance or benefit wild populations of the species involved. While we will communicate with the range country for the species you will hunt or hunted when making the required findings, if you have any information that could support this finding, it would be helpful for our review if you could provide it. Please submit such information on a separate page with your application.
- a. Do you have any information regarding the population status or trend data on the species hunted?
IT'S A PRIVATE 6,000 ACRE RANCH. THERE ARE APPROXIMATELY 2,000 ANIMALS ON THE RANCH, INCLUDING APPROXIMATELY 150 MALE LIONS
- b. In order to hunt, you likely paid for licenses or trophy fees. What were those fees and do you have any information on how those funds were used by either the landowner, local community, or government?
TOTAL HUNT COST \$16,000 FOR ONE MALE LION AND FIVE OTHER TROPHIES. I DON'T KNOW HOW THE MONEY IS DISTRIBUTED, BUT IF LION HUNTS, SOLD, ALL ANIMALS MUST BE KILLED. ARE NOT
- c. Do you have information on other funding activities that are being carried out, or were carried out, by the safari outfitter, professional hunter, concession holder, or landowner that provide a conservation benefit to the species being hunted/species hunted?
THE OUTFITTER RUNS A GAME PRESERVE RANCH. LION HUNTS ARE SOLD TO SUPPORT OTHER LIONS AND THOUSANDS OF OTHER ANIMALS ON THE HIGH-FENCE RANCH.

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

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

I acknowledge that the sport-hunted trophy/trophies to be imported has been/will be personally hunted by my client and is being imported only for my client's personal use (i.e., not for sale, transfer, donation, or exchange that is reasonably likely to result in economic use, gain, or benefit). If applying for the import of an elephant trophy, I understand that my client may import no more than two elephant trophies in one calendar year.

Taxidermist/Broker's signature: _____ Date: _____

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

I acknowledge that the sport-hunted trophy/trophies to be imported has been/will be personally hunted by me and is being imported only for my personal use (i.e., not for sale, transfer, donation, or exchange that is reasonably likely to result in economic use, gain, or benefit). If applying to import an elephant trophy, I understand that I may import no more than two elephant trophies in one calendar year.

Applicant's signature: (b) (6) _____ Date: 02/20/2019

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

- 12. All international shipments must be through a designated port. A list of designated ports (where an inspector is posted) is available from **the list of designated ports**. If you wish to use a port not listed, please contact the Office of Law Enforcement for a Designated Port Exemption Permit (form 3-200-2).

NOT YET DETERMINED

(b) (6)

(b) (6)

4-14-19

DATE

PAY TO THE
ORDER OF

U.S. FISH & WILDLIFE

\$100⁰⁰

ONE HUNDRED & 00/100

DOLLARS



Security
Features
Details on
Back.



REGIONS

(b) (6)

FOR

LION IMPORT PERMIT



MP

(b) (6)