



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 Threatened-listed  
(Appendix I of CITES and/of ESA) lion

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 Atkinson	1 b. First name Carl	1 c. Middle name or initial R	1 d. Suffix
2. Date of birth (mm/dd/yyyy) (b) (6)	3. Social Security No.	4. Occupation	5. Affiliation/Doing business as (see instructions)

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 phone	
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. (b) (6)			
1 b. City Orlando	1 c. State FL.	1 d. Zip code/Postal code (b) (6)	1 e. 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. Country/Province

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 - attach documentation of fee exempt status as outlined in instructions. (50 CFR 13.11(d))	
2. Do you currently have or have you ever had any Federal Fish and Wildlife permits? Yes <input checked="" type="checkbox"/> If yes, list the number of the most current permit you have held or that you are applying to renew/re-issue: _____ No <input type="checkbox"/>	
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 and belief, and understand that any false statement herein may subject me to the criminal penalties of 18 U.S.C. 1001. (b) (6) _____ 11/1/16 11/1/2016 Signature (in blue ink) of applicant/person responsible 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:** 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 are 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:** 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 3:** USFWS has determined that a trophy consists of raw or tanned parts of a specimen taken by a hunter during 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 4:** 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 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 1-5 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. For each trophy to be imported, provide:
  - a. Scientific name (genus, species, and, if applicable, subspecies) and common name.  
P. l. melanochaita (African lion)

- b. Sex (if known).  
Male

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: Tanzania, Area: Lukwati North Game Reserve, Piri West Game Reserve,

Chunya Masami Game Reserve, Chunya Lukwati open area

Region: Chunya Nearest city: Chunya

GIS: 7.22° 37.80 S 32.50° 8.62 E (Chunya Camp)

- b. Date wildlife is to be hunted:

9/6/2017 — 9/25/2017

- c. Description of the trophy and parts you intend to import (e.g., skin, skull, shoulder mount, life size mount, claws, horn, tusks). SKIN, SKULL, ~~life size mount~~, claws, teeth

All parts including skin, skull, teeth, and claws.

3. IF THE ANIMAL IS DEAD, please enter the following:

- a. Country and PLACE (area, region, GIS coordinates, ranch AND nearest city) where wildlife was removed from the wild (provide a map if possible):

N/A

- b. Date wildlife was hunted:

N/A

c. Description of the trophy and parts you intend to import (e.g., skin, skull, shoulder mount, life size mount, claws, horn, tusks).

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 export/re-export documents]:

N/A

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 also appear on your Namibian export permit and must match the U.S. import permit].

Name:

Business Name: Old Nyika Safaris

Address: SAKINA AREA OFF NAIROBI ROAD

Address: ARUSHA, TANZANIA

City:

State/Province:

Country, Postal Code:

5. 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. If you have any information that could support this finding (e.g., population status or trend data; 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.

Please see information provided by Conservation Force and Tanzanian authorities and operators, including any non-CERTIFICATION STATEMENT (original signature must be provided for either 6 or 7 below) detriment findings or responses to USFWS information requests.

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. (b) (5)

Applicant's signature: \_\_\_\_\_ Date: November 11, 2016

Be aware that there may be additional permitting or approval requirements by your local or state government, as well as required by other Federal agencies or foreign government to conduct your propose activity. While the Service will attempt to assist you, 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 permit 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):  
John J. Jackson, III or Regina Lennox of Conservation Force  
504-837-1233, jjw-no2@att.net or regina.lennox@conservationforce.org
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.

[EXTERNAL] Re:

7 messages

Carl Atkinson (b) (6) >  
To: "Butzler, Julia" <julia\_butzler@fws.gov>  
Cc: jjj@conservationforce.org

Wed, Mar 27, 2019 at 1:53 PM

Dear Julia,

No animal has been harvested yet, but I will be going hunting with Mike Angelides - Safari Royal between July 11, 2019 and August 8, 2019. The hunting area for this hunt and these dates is Lukwati North Game Reserve. If you need any additional information please let me know.

Thank you,  
Carl Atkinson

On Mar 27, 2019, at 12:55 PM, Butzler, Julia <julia\_butzler@fws.gov> wrote:

Mr. Atkinson,

I am in the process of reviewing your application to import a lion from Tanzania. Can you please provide me with information about the harvest, e.g., location and date?

Thank you,

--

Julia Butzler, Biologist  
Branch of Permits  
Division of Management Authority  
U.S. Fish and Wildlife Service  
(703) 358-1988

**Please respond to any requests for information or documentation within 45 days from the date of this message; if not received within 45 days, your application will be considered incomplete and will be placed in our inactive files and we will not complete your request for a permit.**

Butzler, Julia <julia\_butzler@fws.gov>  
To: Carl Atkinson (b) (6)

Wed, Mar 27, 2019 at 2:04 PM

sounds good.

thank you!

[Quoted text hidden]

Carl Atkinson (b) (6) >  
To: "Butzler, Julia" <julia\_butzler@fws.gov>

Tue, Apr 30, 2019 at 2:04 PM

Dear Julia,

My safari starts fairly soon and I was wondering if you could update me on the status of my application.

Thank you,  
Carl Atkinson  
[Quoted text hidden]

Butzler, Julia <julia\_butzler@fws.gov>  
To: Carl Atkinson (b) (6)

Wed, May 1, 2019 at 4:24 PM

Mr. Atkinson,

I have drafted the permit, and it is in review. I'm sorry that I can't give you a date when it will be finalized, but we ARE processing it!

Feel free to contact me if you have any further questions or concerns.

Thank you  
[Quoted text hidden]

Carl Atkinson (b) (6) >  
To: "Butzler, Julia" <julia\_butzler@fws.gov>

Wed, May 1, 2019 at 5:06 PM

Dear Julia,

I appreciate you letting me know that it's in review. I appreciate the work you've done, and hopefully, it will be approved before my safari. I'll keep my fingers crossed.

Thanks again,  
Carl  
[Quoted text hidden]

Butzler, Julia <julia\_butzler@fws.gov>  
To: Carl Atkinson (b) (6)

Thu, May 2, 2019 at 9:34 AM

you are the first TZ lion application that we are drafting, since our visit to Tanzania, so it IS taking a long time. Feel free to reach out to me at any time in the near future for an update.

[Quoted text hidden]

Carl Atkinson (b) (6)

Thu, May 2, 2019 at 10:58 AM

To: "Butzler, Julia" <julia\_butzler@fws.gov>

Thank you.

[Quoted text hidden]



Butzler, Julia <julia\_butzler@fws.gov>

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## USFWS lion enhancement finding for Tanzania / additional information request

8 messages

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Butzler, Julia <julia\_butzler@fws.gov>

Wed, May 15, 2019 at 11:46 AM

To: james.wakibara@tawa.go.tz, jwakibara@yahoo.com, iman.nkuwi@tawa.go.tz, nkuwiimani@gmail.com

Dr. Wakibara and Mr. Nkuwi,

Good morning.

First, let me thank you and your colleagues for hosting our delegation in Tanzania in November, 2018. It was an informative experience, and has proven to be invaluable in our evaluation of the management of lion hunting in your country.

As you are aware, part of making a determination as to whether the authorization of import of sport-hunted trophies into the United States would serve to enhance the propagation or survival of the lion includes an assessment of Tanzania's CITES non-detriment finding (NDF) for lions. The non-detriment finding provided by TAWA in 2016 states that, "Once fully operational, the Tanzania Wildlife Management Authority (TAWA), will retain 100% of the hunting revenues, thereby changing the [previous] system...TAWA should be fully operational in the second half of 2016". Can you please verify the following:

- 1/ When was TAWA deemed fully operational?
- 2/ Does TAWA retain 100% of the hunting revenues? Exactly what fees does this include?

I would like to thank you in advance for your time and consideration in your response.

Sincerely,

Julia Butzler

--

Julia Butzler, Biologist  
Branch of Permits  
Division of Management Authority  
U.S. Fish and Wildlife Service  
(703) 358-1988

**Please respond to any requests for information or documentation within 45 days from the date of this message; if not received within 45 days, your application will be considered incomplete and will be placed in our inactive files and we will not complete your request for a permit.**

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Imani Nkuwi <nkuwiimani@gmail.com>

Wed, May 15, 2019 at 11:47 AM

To: julia\_butzler@fws.gov

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**Imani Richard Nkuwi, ndc**  
**Director of Tourism and Business Services**  
**Tanzania Wildlife Management Authority**  
**+255784999191**  
**Official email: [iman.nkuwi@tawa.go.tz](mailto:iman.nkuwi@tawa.go.tz)**

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Imani Nkuwi <nkuwiimani@gmail.com>

Wed, May 15, 2019 at 11:55 AM

To: "Butzler, Julia" <julia\_butzler@fws.gov>

Cc: james.wakibara@tawa.go.tz, jwakibara@yahoo.com, iman.nkuwi@tawa.go.tz

Dear Dr Julia

Greetings from Tanzania

I am delighted to hear from USFWS.

We will reply two questions raised as soon as possible

Thank you

**Imani Richard Nkuwi, ndc**  
**Director of Tourism and Business Services**  
**Tanzania Wildlife Management Authority (TAWA)**  
**+255784999191**

[iman.nkuwi@tawa.go.tz](mailto:iman.nkuwi@tawa.go.tz)

[Quoted text hidden]

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**Imani Nkuwi** <nkuwiimani@gmail.com>  
To: "Butzler, Julia" <julia\_butzler@fws.gov>  
Cc: james.wakibara@tawa.go.tz, jwak bara@yahoo.com, iman.nkuwi@tawa.go.tz

Thu, May 16, 2019 at 8:14 AM

Dear Julia,

Thank you for your email, we truly appreciate for your efforts in making a positive determination of import of lion sport-hunted trophies into the United States of America. We wish to provide clarification as per request:

1. Tanzania Wildlife Management Authority was operational on 1<sup>st</sup> July 2016 and the headquarters are located in Morogoro. TAWA manages wildlife in Game Reserves (GRs), Game Controlled Areas (GCAs), Wetland Reserves and Wildlife Open Areas used as hunting blocks.
2. TAWA operations largely depend on revenue generated from sustainable utilization of resources in the areas of its mandate and hunting account for 70% of TAWA revenue. Since its inception in 1<sup>st</sup> July 2016, TAWA retains 100% of revenue generated from hunting. The major sources of revenue from hunting include;
  - i. Bock fees,
  - ii. Block application fees,
  - iii. Block transfer request fees,
  - iiii. Block transfer fees,
  - v. Permit fees,
  - vi. Conservation fees,
  - vii. Observer fees,
  - viii. Game Fees,
  - ix. Intercompany hunting fees,
  - x. Trophy handling fees,
  - xi. Professional Hunters licence fees,
  - xii. Professional Hunters examination fees,

Should you need further clarifications, please do not hesitate to ask.

Regards

**Imani Richard Nkuwi,ndc**  
Director of Tourism and Business Services  
Tanzania Wildlife Management Authority (TAWA)  
+255784999191  
[iman.nkuwi@tawa.go.tz](mailto:iman.nkuwi@tawa.go.tz)

On 15 May 2019, at 18:46, Butzler, Julia <julia\_butzler@fws.gov> wrote:

[Quoted text hidden]

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**iman.nkuwi@tawa.go.tz** <iman.nkuwi@tawa.go.tz>  
To: "Butzler, Julia" <julia\_butzler@fws.gov>  
Cc: nkuwiimani@gmail.com, jwakibara@yahoo.com, james.wakibara@tawa.go.tz

Thu, May 16, 2019 at 8:35 AM

Dear Julia,

Thank you for your email, we truly appreciate for your efforts in making a positive determination of import of lion sport-hunted trophies into the United States of America. We wish to provide clarification as per request:

1. Tanzania Wildlife Management Authority was operational on 1st July 2016 and the headquarters are located in Morogoro. TAWA manages wildlife in Game Reserves (GRs), Game Controlled Areas (GCAs), Wetland Reserves and Wildlife Open Areas used as hunting blocks.
2. TAWA operations largely depend on revenue generated from sustainable utilization of resources in the areas of its mandate and hunting account for 70% of TAWA revenue. Since its inception in 1st July 2016, TAWA retains 100% of revenue generated from hunting. The major sources of revenue from hunting include;
  - i. Bock fees,
  - ii. Block application fees,
  - iii. Block transfer request fees,
  - iiii. Block transfer fees,
  - v. Permit fees,
  - vi. Conservation fees,
  - vii. Observer fees,
  - viii. Game Fees,
  - ix. Intercompany hunting fees,
  - x. Trophy handling fees,
  - xi. Professional Hunters licence fees,
  - xii. Professional Hunters examination fees,

Should you need further clarifications, please do not hesitate to ask.

Regards

Imani

<br>-----

<br>----- Message from "Butzler, Julia" <julia\_butzler@fws.gov> -----

Date: Wed, 15 May 2019 11:46:07 -0400

From: "Butzler, Julia" <julia\_butzler@fws.gov>

Subject: USFWS lion enhancement finding for Tanzania / additional information request

To: james.wakibara@tawa.go.tz, jwakibara@yahoo.com, iman.nkuwi@tawa.go.tz, nkuwiimani@gmail.com

Dr. Wak bara and Mr. Nkuwi,

Good morning.

First, let me thank you and your colleagues for hosting our delegation in Tanzania in November, 2018. It was an informative experience, and has proven to be invaluable in our evaluation of the management of lion hunting in your country.

As you are aware, part of making a determination as to whether the authorization of import of sport-hunted trophies into the United States would serve to enhance the propagation or survival of the lion includes an assessment of Tanzania's CITES non-detriment finding (NDF) for lions. The non-detriment finding provided by TAWA in 2016 states that, "Once fully operational, the Tanzania Wildlife Management Authority (TAWA), will retain 100% of the hunting revenues, thereby changing the [previous] system...TAWA should be fully operational in the second half of 2016". Can you please verify the following:

- 1/ When was TAWA deemed fully operational?
- 2/ Does TAWA retain 100% of the hunting revenues? Exactly what fees does this include?

I would like to thank you in advance for your time and consideration in your response.

Sincerely,

Julia Butzler

----- End message from "Butzler, Julia" <julia\_butzler@fws.gov> -----

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**Butzler, Julia** <julia\_butzler@fws.gov>  
To: Imani Nkuwi <nkuwiimani@gmail.com>

Tue, May 21, 2019 at 2:08 PM

Dear, Imani,

Thank you for your quick response.

One final question: Is this statement ("TAWA operations largely depend on revenue generated from sustainable utilization of resources in the areas of its mandate and hunting account for 70% of TAWA revenue. Since its inception in 1<sup>st</sup> July 2016, TAWA retains 100% of revenue generated from hunting" codified in regulations somewhere, so that I can reference it?

We are INCHING closer to a determination!

Thank you so much for your help!

Julia

[Quoted text hidden]

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**Imani Nkuwi** <nkuwiimani@gmail.com>  
To: julia\_butzler@fws.gov

Tue, May 21, 2019 at 2:08 PM

--

**Imani Richard Nkuwi, ndc**  
Director of Tourism and Business Services

**Tanzania Wildlife Management Authority**  
**+255784999191**  
**Official email: [iman.nkuwi@tawa.go.tz](mailto:iman.nkuwi@tawa.go.tz)**

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**Imani Nkuwi** <nkuwiimani@gmail.com>  
To: "Butzler, Julia" <julia\_butzler@fws.gov>  
Cc: Dr James Wak bara <jwakibara@yahoo.com>

Wed, May 22, 2019 at 12:55 PM

Dear Julia,

Greetings from TAWA,

I thank you for your comments, it is so encouraging and we are hoping that soon you will issue a positive determination.

The mandate to collect and retain revenue from the trophy hunting is enshrined in "***The Wildlife Conservation (The Tanzania Wildlife Management Authority) Establishment Order, 2014***" (TAWA Order).

This is the subsidiary legislation made under the Wildlife Conservation Act No. 5 of 2009.

Thank you for a continued cooperation

**Imani Richard Nkuwi,ndc**  
Director of Tourism and Business Services  
Tanzania Wildlife Management Authority (TAWA)  
+255784999191  
[iman.nkuwi@tawa.go.tz](mailto:iman.nkuwi@tawa.go.tz)  
[Quoted text hidden]

JUN 11 2019

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



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

Federal Fish and Wildlife Permit Application Form

Return to: U.S. Fish and Wildlife Service  
(Enter address from pages 5 and 6 of application)

Type of Activity:  
**REISSUANCE, RENEWAL, OR AMENDMENT OF A PERMIT**  
(For this application, all permits, registrations, and certificates are referred to as a permit.)

Complete Sections A or B, 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 <b>ATKINSON</b>	1.b. First name <b>CARL</b>	1.c. Middle name or initial <b>R</b>	1.d. Suffix
2. Date of birth (mm/dd/yyyy) <b>(b) (6)</b>	3. Social Security No. <b>(b) (6)</b>	4. Occupation <b>(b) (6)</b>	5. Affiliation/ Doing business as (see instructions)
6.a. Telephone number <b>(b) (6)</b>	6.b. Alternate telephone number <b>(b) (6)</b>	6.d. 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 <b>(NA)</b>		
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) <b>(b) (6)</b>					
1.b. City <b>ORLANDO</b>	1.c. State <b>FL.</b>	1.d. Zip code/Postal code: <b>(b) (6)</b>	1.e. County/Province	1.f. Country <b>USA</b>	
2.a. Mailing Address (include if different than physical address; include name of contact person if different) <b>SAME</b>					
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 indicated on pages 6 and 7. 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)) <b>(NA)</b>	
2. Do you currently have or have you ever had any Federal Fish and Wildlife permits? Yes <input checked="" type="checkbox"/> If yes, list the number of the most current permit you have held or that you are applying to renew/re-issue: <b>12548C</b> No <input type="checkbox"/>	
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 instructions. 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 that any false statement herein may subject me to the criminal penalties of 18 U.S.C. 1001. <b>(b) (6)</b> Responsible for permit (No photocopied or stamped signatures) <b>06/11/2019</b> Date of signature (mm/dd/yyyy)	

prepaid shipping label sent to  
Julia Butzler, Biologist  
USFWS

**E. REISSUANCE, RENEWAL, OR AMENDMENT OF A PERMIT** (For this application, all permits, registrations, and certificates are referred to as a permit.)

**NOTE 1:** If you are renewing your Designated Port Exemption permit, use form 3-200-2 (<http://www.fws.gov/forms/3-200-2.pdf>) and submit to appropriate Office of Law Enforcement address. If you are renewing your Import/Export license (required for commercial activities), use form 3-200-3 (<http://www.fws.gov/forms/3-200-3.pdf>) and submit to appropriate Office of Law Enforcement address.

**NOTE 2:** This form **cannot** be used for lost or damaged permit. If you need to replace a lost or damaged permit, please use form 3-200-66, <http://www.fws.gov/international/pdf/permit-application-form-3-200-66-replacement-document.pdf>. The application **must** be submitted to the office that issued the initial permit. Lost or damaged permit

**NOTE 3:** Some activities, such as all master files for multiple shipments, Certificate of Scientific Exchange (COSE), circus/traveling exhibits, and artificially propagated plants, can only be re-issued, renewed, or amended by submitting a new application for permits for those activities. Please refer to <http://www.fws.gov/international/permits/by-form-number/index.html> to determine if another application form would be more appropriate or contact the Division of Management Authority for more information.

1. **Permit number.** Enter the permit number to be reissued/renewed/amend 1254BC.
2. Submit the original permit with this application.  
*Never received original*
3. **Past activities.**
  - a. Provide copies of all cleared documents and form 3-177 (FWS declaration of wildlife) associated with this permit.
  - b. Provide a summary detailing activities conducted under this permit, as well as a brief statement of why you are seeking reissuance/renewal.
4. **Annual Report.** If required by your permit, provide an annual report as conditioned (Please disregard if you have already submitted your annual report.)
5. **Sport-hunted trophies:** If you did not hunt during the hunting season stated in your original application, you are not eligible for a renewal. Please submit a new application form.

6. **Certification** - Complete one of the statements below and supply any additional documentation requested: (original signature is required)

a. For **NO CHANGES** to original application:

I certify that the information submitted in support of my original application for the permit indicated above has not changed and is still currently correct. I hereby request reissuance or renewal of this permit.

Permittee's signature: \_\_\_\_\_ Date: \_\_\_\_\_

b. For **CHANGES** to original application:

On an attached page(s), provide a complete description of any changes (e.g., change in principal officer, personnel, address, location of activities, types of activities). Please sign each attached page. Also note that we need to request additional information regarding the changes after reviewing your initial request.

I certify that the information submitted in support of my original application for the permit indicated above is still currently correct EXCEPT for the changes noted on the attached, signed page(s). I hereby request re-issuance or renewal of this permit with the indicated changes.

Permittee's signature: (b) (6) \_\_\_\_\_ Date: 06/11/2019

7. All international shipment(s) must be through a designated port, unless otherwise authorized. 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 either the Office of Law Enforcement for a Designated Port Exemption Permit (form 3-200-2) or the Division of Management Authority.

8. 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):

Prepaid shipping label already provided to Julia Butzler, USFWS  
(b) (6) Orlando, FL (b) (6)

9. 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 8. I understand that you will contact me for my credit card information once the application has been processed.

Prepaid shipping label provided to Julia Butzler

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

CARL ATKINSON

(b) (6)

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.

6.

b. I'm requesting a change in my physical address from  
(b) (6) Orlando, FL (b) (6) to my  
my current address at (b) (6) Orlando, FL.  
32804. We moved from our old house to our new one  
in November, 2017.

(b) (6)

06/11/2019



# United States Department of the Interior



FISH AND WILDLIFE SERVICE  
International Affairs  
5275 Leesburg Pike, MS: IA  
Falls Church, VA 22041-3803

In Reply Refer To:  
FWS/AIA/DMA/PRT-12548C

Enhancement Finding  
Applicant: Carl R. Atkinson

## I. Summary:

Mr. Atkinson submitted an application on November 9, 2016, for the importation of one male African lion (*Panthera leo melanochaita*) from Tanzania for the purpose of enhancing the propagation or survival of the species in the wild. This subspecies of African lion is listed in Appendix II of the Convention on International Trade in Endangered Species of Wild Fauna and Flora (CITES) and is listed as threatened under the U.S. Endangered Species Act (Act or ESA). As such, export of a hunted African lion from Tanzania requires prior issuance of a CITES export permit from the CITES Management Authority of Tanzania, and import into the United States requires prior issuance of an ESA import permit by the U.S. Fish and Wildlife Service (Service). The Service, therefore, may authorize the import of a sport-hunted lion trophy from Tanzania, but only if it first makes a finding that permitting import of a trophy would enhance the propagation or survival of the species in the wild.

After evaluating the available information submitted with the application, information provided by the government of Tanzania, and other information available to the Service, the Service has determined that the importation of the sport-hunted trophy to be taken between July 11 and August 8, 2019, from the Lukwati North Game Reserve in the Rukwa, Tabora and Mbeya Regions of central and western Tanzania meets the enhancement criteria under 50 CFR 17.32.

The Service recognizes that legal, well-regulated hunting as part of a sound management program can benefit the conservation of certain species by providing incentives to local communities to conserve the species and by putting much-needed revenue back into conservation. A management program for a species such as *P. l. melanochaita* is expected to address, at a minimum, an evaluation of population trends; the biological needs of the species; quotas; management practices; legal protection; local community involvement; and use of hunting fees for conservation; we work closely with the range countries and interested parties to obtain the information. In evaluating whether the importation of Mr. Atkinson's trophy of *P. l. melanochaita* would be authorized in accordance with our permit issuance criteria, we were particularly interested in examining how Tanzania's management program for lions addresses the three main threats that have led to the decline of the subspecies: habitat loss, loss of prey base, and human-lion conflict. We considered whether the management program is actively addressing the current and longer term threats to the subspecies based on sound scientific principles. We evaluated how, and how well, the hunting component of the management program addresses these threats by looking at whether hunting concessions/tracts are managed to ensure the long-term survival of the lion, its prey base, and habitat. We also considered how the participation of a U.S. hunter, in this case, Mr. Atkinson, contributes to the overall management of lions within a country.

The government of Tanzania has provided a series of documents, including Tanzania's "enhancement"<sup>1</sup> and non-detriment finding for lions (TAWA, 2016). These documents, verbal updates/presentations at the 16<sup>th</sup> Annual African Wildlife Consultative Forum (Uganda, November 2018), information received in Mr. Atkinson's application, the Tanzania Wildlife Research Institute (TAWIRI), open sources (e.g., IUCN, published literature), and a field mission in November, 2018, were the basis of this finding.

## II. U.S. Governance of the Lion:

On December 23, 2015, the Service published in the Federal Register a final rule effective January 22, 2016, listing the lion subspecies *P. l. melanochaita* (southern and eastern Africa) as a threatened species under the Act with a rule under Section 4(d) of the Act, which is set forth at 50 CFR 17.40(r) (USFWS 2015; 80 Fed. Reg. 79999). Therefore, as of January 22, 2016, the lion subspecies *Panthera leo melanochaita*, whose range includes Tanzania, is listed as threatened under the ESA and is regulated under an ESA species-specific 4(d) rule [50 CFR 17.40(r)].

Where a rule is promulgated for a threatened species under Section 4(d) of the Act, the species-specific 4(d) rule contains the applicable prohibitions and exceptions for the threatened species (50 CFR 17.31(c)). Under the 4(d) rule for *P. l. melanochaita* (50 CFR 17.40(r)), all of the prohibitions of 50 CFR 17.31 and permit provisions of 50 CFR 17.32 apply to *P. l. melanochaita* specimens. The prohibitions, in part, make it illegal for any person subject to the jurisdiction of the United States to "take" (which includes harass, harm, pursue, hunt, shoot, wound, kill, trap, capture, or to attempt any of these) within the United States or upon the high seas; import or export; deliver, receive, carry, transport, or ship in interstate or foreign commerce, by any means whatsoever, in the course of a commercial activity; or sell or offer for sale in interstate or foreign commerce any lion specimens. It also is illegal to possess, sell, deliver, carry, transport, or ship any such wildlife that has been taken in violation of the ESA. Permits may be issued to carry out these otherwise prohibited activities, including import, under certain circumstances (e.g., scientific purposes or activities that enhance the propagation or survival of the species), in accordance with the Service's regulations at 50 CFR 17.32. Accordingly, as we explained when finalizing the 4(d) rule for *P. l. melanochaita*, the Service may authorize the import of a sport-hunted lion trophy from Tanzania, but only if it first makes a finding that permitting the import of a trophy would enhance the survival of the species in the wild (USFWS 2015; 80 Fed. Reg. 79999; 50 CFR 17.40(r)(2); 50 CFR 17.32(a)).

As with all permit applications submitted under 50 CFR 17.32, the individual requesting authorization to import a sport-hunted trophy of *P. l. melanochaita* bears the burden of providing information in their application showing that the activity meets the issuance criteria under 50 CFR 17.32. In some cases, such as for import of sport-hunted trophies, it is not always possible for the applicant to provide all of the necessary information needed by the Service to make a positive determination under the Act to authorize the activity. In such cases, the Service may consult with the range country and other interested parties to the extent practicable to obtain necessary information.

The Service has made the required enhancement finding based on this individual application to

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<sup>1</sup> Note, although "enhancement finding," is referenced in the document's title, the document is not, nor does Tanzania produce, an enhancement finding under the U.S. Endangered Species Act.

import a sport-hunted trophy of *P. l. melanochaita*; however as detailed below, relevant information obtained for the country as a whole has been considered, as it contains information pertinent to the Service's evaluation as required by the 4(d) rule for *P. l. melanochaita*.

#### A. General ESA permitting requirements

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

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

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

## B. IUCN guiding principles

In addition to these factors, particularly in relation to sport-hunting, in the 4(d) rulemaking for *P.l. melanochaita*, the Service explained it considers the publication, *IUCN Species Survival Commission (SSC) Guiding Principles on Trophy Hunting as a Tool for Creating Conservation Incentives* (IUCN SSC, 2012), to provide useful principles, which, considered in conjunction with our threatened species issuance criteria, will aid the Service when making an enhancement finding for importation of sport-hunted trophies of *P.l. melanochaita*. The Service has, therefore, considered these principles in conjunction with our threatened species issuance criteria in making our determination of enhancement concerning import of the sport-hunted *P. l. melanochaita* trophy that is the subject of this permit application. The IUCN document sets out guidance from experts in the field on the use of trophy hunting as a tool for “creating incentives for the conservation of species and their habitats and for the equitable sharing of the benefits of use of natural resources”. It recognizes that recreational hunting, particularly trophy hunting, can contribute to biodiversity conservation and, more specifically, the conservation of the hunted species.(IUCN SSC, 2012)

The IUCN document lays out the following five guiding principles:

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

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

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

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

should also generate reliable documentation of its biological sustainability and conservation benefits.

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

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

### III. Basis for Finding:

As explained above, any person wishing to conduct an otherwise prohibited activity, including import of *P. l. melanochaita* specimens, must first obtain a permit as required by 50 CFR 17.32; issuance of an import permit for a sport-hunted trophy of *P. l. melanochaita* requires an enhancement finding.

The Service has made the required enhancement finding for this import permit based on this individual application to import a sport-hunted trophy of *P. l. melanochaita*. Additionally, as detailed below, relevant information obtained for Tanzania as a whole, has been considered. The government of Tanzania has provided a series of documents, including Tanzania's "enhancement"<sup>2</sup> and non-detriment finding for lions (TAWA, 2016). These documents, verbal updates/presentations at the 16<sup>th</sup> Annual African Wildlife Consultative Forum (Uganda, November 2018), information received in Mr. Atkinson's application, the TAWIRI, open sources (e.g., IUCN, published literature), and a field mission in November, 2018, were the basis of this finding.

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<sup>2</sup> Note, although "enhancement finding," is referenced in the document's title, the document is not, nor does Tanzania produce, an enhancement finding under the U.S. Endangered Species Act.

On April 14, 2016, the Service sent a letter to Mr. Herman Keraryo, Acting Director of Wildlife for the Wildlife Division of the Ministry of Natural Resources and Tourism (MNRT), with a list of questions that would aid the Service in evaluating the overall conservation and management of the lion subspecies, *P. l. melanochaita*, in Tanzania, and whether that management addressed the three main threats that have been identified as the reason for the decline of the species: habitat loss, loss of prey base, and human-lion conflict. Additionally, in the letter the Service referenced the *IUCN Species Survival Commission (SSC) Guiding Principles on Trophy Hunting as a Tool for Creating Conservation Incentives* (IUCN SSC, 2012), as it provides useful principles, which, when considered in conjunction with the Service's permit issuance criteria, would aid the Service in making the required enhancement findings for permitting importation of sport-hunted lion trophies. In response to our April 14, 2016, letter, the MNRT provided a series of documents, including Tanzania's "enhancement" and non-detriment finding for lions.

Upon invitation, a U.S. delegation of Service personnel visited Tanzania in November 2018 to observe the challenges and successes of conserving wildlife, including lions, in Tanzania. This trip allowed first-hand exposure to the on-the-ground implementation of policies and procedures the government has put into place to conserve lions. Detailed discussions with government officials, national experts, land managers, game officers, village leaders, and leaders in the hunting industry, as well as several site visits, served to both substantiate and elucidate information provided in documents. We determined that the status of lions and the management approach of Tanzania are substantially as presented, conferring confidence to the conclusions drawn from information provided.

#### IV. Governance of Wildlife in Tanzania:

In Tanzania, wildlife resources, such as lions, are protected under several Acts of Parliament, establishing the authority for all aspects of wildlife management, including law enforcement activities. The **Wildlife Conservation Act (WCA)** of 2009, which replaced the original WCA of 1974, provides the legal framework for operation of the Wildlife Division under the MNRT, including the appointment of the Director of Wildlife. The WCA provides for the establishment of a Wildlife Protection Unit granted paramilitary status to protect wildlife against unlawful utilization, and a Wildlife Authority to manage all Tanzania wildlife located outside the boundaries of the National Parks and the Ngorongoro Conservation Area. The Wildlife Authority is also responsible for meeting international obligations involving wildlife conservation. The WCA ensures the protection of natural habitat and wildlife through the establishment of a network of protected areas, e.g., Game Reserves, Game Controlled Areas, Wildlife Management Areas, and areas such as wildlife corridors. The **National Parks Act (CAP 282 R.E. 2002)** establishes the legal authority for the creation and management of national parks, granting powers to the Director to enable maintenance and security within national parks, as well as the responsibility for the protection of their wildlife resources. The **Ngorongoro Conservation Act (CAP 284 R.E. 2002)** provides the legal framework for the existence of the multiple land use in the Ngorongoro Conservation Area, its Management Authority under the direction of the Conservator, and the authority for its maintenance and security. The **TAWIRI Act (CAP 260 R.E. 2002)** grants powers to the Director who is responsible for research involving wildlife, and for providing this information to the Wildlife Authorities. The TAWIRI also functions as the CITES Scientific Authority for Tanzania.

The responsibility for managing Tanzania's wildlife currently falls primarily under four institutions. The **Tanzania Wildlife Research Institute (TAWIRI)** is responsible for conducting

and coordinating wildlife research in Tanzania. It functions as the scientific authority for wildlife conservation and management. The **Tanzania National Parks Authority (TANAPA)** is responsible for managing 15 National Parks with a total area of 50,872 sq.km. In the national parks, only non-consumptive utilization (tourism game viewing) of wildlife resources is allowed. **Ngorongoro Conservation Area Authority (NCAA)** is responsible for management of only one area, the Ngorongoro Conservation Area, a protected area of 8,300 km<sup>2</sup>. It is the only multiple land use wildlife area in Tanzania in which the consumptive utilization of wildlife is not permitted. Both organizations are parastatal – public organizations, but not directly run by the government; all revenue is kept by the organizations for use in management of these areas.

The Wildlife Division has historically been responsible for the country's wildlife resources located outside the jurisdiction of the Ngorongoro Conservation Area and Tanzania National Parks. However, in response to concerns over questionable management practices and lack of adequate funding for the Wildlife Division to successfully manage wildlife resources, the **Tanzania Wildlife Management Authority (TAWA)** was established in 2014<sup>3</sup>. Also a parastatal organization, TAWA operates with significant autonomy and retains all revenue generated from hunting<sup>4</sup>. TAWA became operational in July 2016, and has since established an aggressive, proactive approach to protecting wildlife. In addition to conducting routine anti-poaching patrols, TAWA is actively building capacity with technology (e.g., GIS), relationships with local communities (e.g., intelligence-led operations), and collaborative efforts on an international scale.

TAWA is responsible for the management of 28 Game Reserves with an area of 112,564 km<sup>2</sup>, approximately 38 Game Controlled Areas covering about 161,521 km<sup>2</sup>, and Ramsar sites covering 249,856 km<sup>2</sup>. There are also District Councils, Local Government institutions that work in collaboration with the TAWA. These Councils oversee wildlife conservation issues and facilitate the establishment and management of Wildlife Management Areas (WMAs) on village lands that are outside of Protected Areas (PAs). WMAs were established as a new category of wildlife conservation area consisting of settled and unsettled lands outside PAs, with the goal of allowing for rural communities and private landholders to manage wildlife on their land for their own benefit, shifting wildlife such as lions from a liability to an asset. The framework for WMAs was outlined in Tanzania's Wildlife Policy of 1998 (revised in 2007), with legislation established under the Wildlife Management Areas Regulations of 2002, authorizing the formal establishment of WMAs.

From 2010 to 2014, over 1.3 million USD from hunting fees were disbursed to WMAs (TAWA, 2016). In 2012, Tanzania amended its Wildlife Management Area Regulations to provide a new basis for strengthening the links between local communities and wildlife management by addressing the issues of benefit sharing and control over concession allocations. Under the new regulations, the WMAs receive 75% of the block fees, as well as 45% of the game fees, observer fees, and conservation fees. These new provisions provide the WMAs with approximately 60-65% of the total hunting revenue occurring within the block. Additionally, WMAs gained the power to sign utilization contracts with the private sector, enabling seven WMAs to sign contracts with hunting operations worth more than 4.3 million USD (TAWA, 2016). The establishment of these WMAs has resulted in an additional 23,700 km<sup>2</sup> of Tanzania's land area being added to its

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<sup>3</sup> Prior to the establishment of TAWA, funding to the Wildlife Division was paid by the central treasury; inadequate funding left the Wildlife Division unable to effectively manage and protect Tanzania's wildlife resources.

<sup>4</sup> The mandate to collect and retain revenue from trophy hunting is enshrined in "The Wildlife Conservation (The Tanzania Wildlife Management Authority) Establishment Order 2014.

conservation network and increased capacity for protected area management through the training of village game scouts and WMA managers.

The tourism industry, largely wildlife-based, contributes to about 13% of Tanzania's annual Gross National Product and is predicted to increase (WTTC, 2017). The tourist industry generates almost 6 billion per year (WTTC, 2017) with about 80 million annually going to TANAPA, NCAA, and the Wildlife Division to fund their operations. The three parastatal organizations, TANAPA, NCAA and TAWA, retain 100% of their revenue share. Both TANAPA and NCAA are generally self-sustaining; consequently, National Parks and equivalent areas such as Ngorongoro Conservation Area, with an area covering approximately 57,387 km<sup>2</sup>, or 38% of all PAs in Tanzania, are adequately funded. Revenue generated from the sustainable utilization of resources (i.e., hunting) accounts for 70% of TAWA revenue; therefore, the viability of TAWA will depend, in part, on sufficient revenue from safari hunting. In 2012/2013, the Government of Tanzania re-established the Selous Game Reserve Revenue Retention Scheme, whereby 50% of the revenue generated from photographic tourism and tourist safari hunting is retained in order to meet management and enforcement costs in the Selous Game Reserve, one of the largest protected areas in Africa.

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

Tanzania is also a member of the Southern African Development Community (SADC). Under the SADC Treaty, Article 5(g) establishes objectives to, among other aspects, promote the sustainable use of wildlife, harmonization of legal instruments governing wildlife use and conservation, promote the conservation of shared wildlife resources through the establishment of transfrontier conservation areas, and facilitate community-based natural resources management practices. As required of a member state, Tanzania has established management programs for the conservation and sustainable use of wildlife.

## V. Status of Lions in Tanzania:

Approximately 40% of all lions in Africa are found in Tanzania (Riggio et al., 2013). The lion range in Tanzania covers over 90% of land (Mesochina et al., 2010), with four main subpopulations:

1. the Maasailand Ecosystem, which encompasses the Mara, Arusha Kilimanjaro and Manyara Regions of northeastern Tanzania;
2. the Kagera and Kigoma Regions of northwestern Tanzania;
3. the Rukwa, Tabora and Mbeya Regions of central and western Tanzania;
4. Selous Ecosystem, which encompasses the Lindi, Morogoro and Ruvuma Regions of southern Tanzania.

TAWIRI presents Tanzania's latest lion population estimates as 16,800 individuals (Mesochina et al., 2010), and 17,564 (12,208-19,320) (Ikanda & Packer, 2006). They estimate that 13,600 (or

81%) of these lions occurred within PAs and approximately 3,200 (or 19%) individuals occurred outside PAs. According to Riggio et al. (Riggio et al., 2013) and Björklund (Björklund, 2003), the minimum number of lions estimated to categorize an area as a lion stronghold is 500 individuals. The estimated lion population size of the four main ecosystems was 3,700 in the Maasailand Ecosystem, 520 in Kagera and Kigoma Regions, 2,300 in Rukwa, Tabora and Mbeya Regions, and 7,200 in the Selous Ecosystem. Trend analysis of the lion population in Tanzania is limited due to the sporadic nature and variable methodology of past surveys, as well as the difficulty of obtaining precise lion counts (Brink, Smith, & Skinner, 2013; Funston et al., 2010), but it is suggested that, nationally, far fewer lions exist today than did 50 years ago (Ikanda, 2008). Available information suggests that this may be spatially variable, e.g., declining populations in Katavi and Tarangire (Bauer et al., 2015) and stable populations in the Selous Game Reserve (Packer et al., 2011).

## VI. Management of Tanzania's Lion Population

In recognition of the role that Tanzania plays in the conservation of this species, a workshop was held in 2006 to assess available information and to set priorities for conservation of the lion in Tanzania. The Tanzania Lion and Leopard Conservation Action Plan (TAWIRI, 2009) provided an overview of this workshop and outlined a national strategic plan for lion conservation. Habitat loss and increased conflict with humans had been identified as the major threat to the species. The Tanzania Lion and Leopard Conservation Action Plan (Plan) concluded that, for those lion populations existing outside National Parks, well-run trophy hunting programs could be leveraged to successfully manage and conserve lions against these threats. To that point, the majority of permanent lion range in Tanzania lies within protected areas, 61% of which are designated as hunting areas (Mesochina et al., 2010).

### A. Hunting:

Hunting of lions is allowed across much of Tanzania. Safari hunting occurs in areas known as hunting blocks, designated in Game Reserves, Game Controlled Areas, Open Areas, Forest Reserves and WMAs. Until recently, blocks were allocated using an administrative process; the government would invite hunting companies to apply to operate a hunting block. Interested hunting companies were evaluated by the Hunting Block Advisory Committee. Hunting companies were allocated blocks for a period of five years, with a reporting requirement on the third year to determine compliance under the terms outlined within the hunting block regulations (TAWA, 2016). However, in 2017, it was announced that the block allocation process would be amended to introduce an auction system.

Wildlife hunting in Tanzania is based on hunting regulations set forth in Tourist Hunting Regulations No. 306 (2002). The hunting regulations specify the fees for hunting different species, and further specify a minimum number of hunting days. Hunters are required to purchase a minimum 21-day safari in order to request a permit for the harvest of lions, as well as other specified animals (e.g., elephant, leopard). Hunters must pay a number of different fees for permits and licenses to be granted harvest authorization. The game fee to hunt a lion is the second highest game fee in Tanzania, second only to elephants.

A quota system historically was the primary method of regulating trophy hunting in Tanzania. However, the Plan noted the lack of scientific justification underlying that

system. Furthermore, a quota system is reliant on accurate population estimates, a near impossibility with lions. A model that simulated the dynamics of populations as a function of both quota size and age at harvest showed that there is almost no negative affect on population size when hunting is restricted to males six years or older (Whitman, Starfield, Quadling, & Packer, 2007). Restricting lion hunting by age would reduce the reliance on population estimates – an intensive and expensive effort that does not reliably return accurate results. Tanzania was the first country in African lion range states to officially establish age restriction rules, prohibiting hunting lions of an age below six years (section 27(1) of the Tourist Hunting Regulations of 2015). Violations of this regulation can result in penalties for the professional hunter guiding the offending hunter, including fees and revoking of the professional hunters' license. Although inspection of trophies are required prior to export, the fundamental difficulties of accurately estimating lion age, as well as a disregard for these regulations, can result in the take of lions younger than six years. Tanzania has consequently implemented a quota system by hunting area that is set according to the lions harvested during the previous hunting season. This two-pronged approach is designed to direct hunting intensity to surplus/huntible lions (TAWA, 2016).

Annual harvest quotas have been lowered over the past decade, from 520 in 2008-2009 (Lindsey et al., 2013) to 315 in recent years (TAWA, 2016). In 2016, the annual quota was further reduced to 200 individuals (TAWA, 2016). An annual quota of 200 individuals is well within the suggested sustainable 1 lion/2000 km<sup>2</sup> harvest rate identified by Packer et al. (Packer et al., 2011), and 25% below the sustainable harvest level suggested by TAWIRI (TAWA, 2016). Tanzania further addressed offtake rates by establishing an age-based rule for the harvesting of lions, as discussed above. Trophies can only be exported if the lion is posthumously determined to be 4 years of age or older. If a trophy lion is estimated to be 4-6 years, the hunter/client may export that lion, but the quota for the hunting block where the trophy was taken is reduced for the following hunting season. If a trophy is taken below the age of 4, penalties described above include a reduction of the hunting block's quota of harvestable lions by 2 and potential cancellation of the hunter's license along with other penalties such as the trophy not being eligible for export. If the trophy meets the criteria of 6 years of age or older, the hunting block's quota remains unchanged for the following hunting season. According to MNRT, these regulations have been in place since the 2012/2013 hunting season. For each trophy harvested, a compulsory hunter evaluation form, photos along with presentation of lion skull to officials for inspection and measurements, including tooth x-rays, are necessary prior to the issuance of an export permit (MNRT, 2015; TAWA, 2016).

#### **B. Human-Lion Conflict:**

It is difficult to estimate how many lions are killed illegally each year; however, retaliatory killings may be as high as 200 individuals annually (TAWA, 2016). Lions are provided protection from illegal or retaliatory killing under the Fourth Schedule due in part to human/livestock-conflict under the Dangerous Animals Damage Consolation (Government Notice No. 146) of 2011; unauthorized personnel are not permitted to kill a conflict lion unless under exceptional circumstances. Tanzania established a mitigation scheme to protect lions from retaliatory killings. This scheme consoles people affected by the loss of relatives and property through payment in kind, and is intended to increase human tolerance for lions (TAWA, 2016).

## VII. Evaluation:

In evaluating whether the importation of Mr. Atkinson's trophy of *P. l. melanochaita* would be authorized pursuant to 50 CFR 17.32, in accordance with our permit issuance criteria, we examined how Tanzania's management program for lions addresses the three main threats that have led to the decline of the subspecies: habitat loss, loss of prey base, and human-lion conflict. We considered whether the management program is based on sound scientific information and identifies mechanisms that would arrest the loss of habitat or increase available habitat (*i.e.*, by establishing protected areas and ensuring adequate protection from human encroachment). We considered whether the management program actively addresses the loss of the lion's prey base by addressing poaching or unsustainable offtake within the country. For example, several components of a management plan by which trophy imports could meet the issuance criteria might be government incentives in place that lead to increased habitat protection for lions by private landowners and communities, and incentives provided to local communities that lead to reductions in the incursion of livestock into protected areas for lions or lead to increases in active management of livestock to reduce conflicts with lions. We examined if the hunting component of the management program supports all of these efforts by looking at whether hunting concessions/tracts are managed to ensure the long-term survival of the lion, its prey base, and habitat. Hunting, if properly conducted and well managed, can generate significant economic benefits that may contribute to the conservation of lions. As such, we examined if the trophy hunting provides financial/resource assistance to the wildlife department to carry out elements of the management program, and if there is a compensation scheme or other incentives to benefit local communities that may be impacted by lion predation. We also considered how a U.S. hunter's, in this case, Mr. Atkinson's, participation in the hunting program contributes to the overall management of lions within the country.

As stated earlier, the Service has evaluated this application in accordance with our regulations at 50 CFR 17.32 and the issuance criteria for threatened species permits [(50 CFR 17.32(a)(2))]. In evaluating each of these criteria based on information available to the Service, we have been able to determine for this application that the import of the wild lion trophy animal would enhance the propagation or survival of the species in the wild and qualifies for the issuance of the required import permit.

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

In evaluating this criterion, the Service assesses whether the proposed activity in this permit application (import of a trophy hunted lion from Tanzania) has demonstrated the ability to contribute towards positive conservation outcomes that mitigate or improve the status of lions throughout their range while addressing the main threats of habitat loss, human-lion-livestock conflict, and prey depletion that collectively contribute towards continued population declines.

Tanzania faces a growing human population, and the subsequent development of land and increasing rates of human-wildlife interactions. Protection of suitable habitat for both the lion and its prey is essential for the survival of the lion, as well as developing and sustaining the local communities' support for such policies. Wildlife protected areas, in various forms, cover about 40% of Tanzania's land area, and safari hunting has created a financial incentive to maintain these areas as wildlife conservation as a land use. Both the consumptive and non-consumptive utilization of wildlife resources contributes to about 13% of Tanzania's annual Gross National

Product and is predicted to increase (WTTC, 2017). The tourist industry generates almost 6 billion per year (WTTC, 2017) with about 80 million annually going to TANAPA, NCAA, and the Wildlife Division to fund their operations.

The companies awarded a hunting block are in a key position to conserve this land for wildlife, and are annually evaluated by the Tanzania government on several criteria, including the maintenance of prey populations, contributions/provision of benefits to the local villages, improvement to infrastructure and protection of the environment, and anti-poaching operations.

Mr. Atkinson will hunt with Old Nyika Safaris, a subsidiary of McCallum Safaris. McCallum Safaris has developed several programs by which to address the main threats to lion populations.

- The company, in collaboration with government game scouts, maintains significant anti-poaching efforts to protect against potential threats to habitat loss and the loss of game. Anti-poaching teams include government scouts with the ability to arrest, and company scouts with years of anti-poaching training and experience. The company has established a network of informants in the villages, and maintains the road system within the hunting area, both of which aid in the monitoring and apprehension of active poachers. The company invests a significant amount of resources into anti-poaching activities, including funding their own poaching teams, purchasing state-of-the-art equipment, and contributing to government anti-poaching operations occurring in areas surrounding their holdings. The successes of these anti-poaching activities include the removal of illegal fishing camps; the seizure of weapons, vehicles, and equipment; and the arrest and prosecution of poachers. The active monitoring by the anti-poaching teams has resulted in a decrease in the occurrences of timber felling.
- While there has been no instances of human-lion conflict in the hunting areas, the company has established an agreement to compensate the owner of the full value of lost livestock.
- The company protects prey base species by setting low off-take quotas, and mandating that professional hunters take only mature adults.
- McCallum Safaris has adopted a company hunting policy to which all professional hunters must adhere, or else lose employment. This policy reiterates the country's age restriction on lion off-take, prohibiting the take of lions under the age of six, of lions accompanied by a pride with cubs or sub-adult lions, or of lions accompanied by a pride of lactating females.
- The company has implemented a lion-monitoring program that allows personnel to view and track the movement of lions. With this data, the company can efficiently and accurately determine the age and status of lions, reducing the take of young males or males accompanied by a protected class of individuals.

It has been stated that upwards of 200 lions are killed annually due to preemptive strikes or as retaliatory actions after some form of direct loss is experienced (TAWA, 2016). In the Ruaha communities surrounding hunting blocks and the Ruaha National Park, researchers reported 35 large carnivores were killed over an 18-month period in three villages. Similarly, Lichtenfeld et

al. (Lichtenfeld, Trout, & Kisimir, 2015) reports that in 12 communities of the Maasai Steppe region, more than 50 attacks by large carnivores on livestock resulting in retaliatory killing of 72-84 lions annually across these communities has been observed. Tanzania established a mitigation scheme to protect lions from retaliatory killings. This scheme consoles people affected by the loss of relatives and property through payment in kind, and is intended to increase human tolerance for lions (TAWA, 2016).

As described above, we have determined that the government of Tanzania and McCallum Safaris contribute towards positive conservation outcomes by addressing the main threats of habitat loss, human-lion-livestock conflict, and prey depletion, which contributes to improving the status of lions in Tanzania. Further, the fees garnered through Mr. Atkinson's hunt will provide revenue to support these positive conservation outcomes.

Therefore, based on the information available to the Service, the purpose for which the permit is being requested, import of this trophy lion, is adequate to justify removing the sport-hunted trophy lion from the wild or otherwise changing its status.

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

A myriad of issues and factors, largely related to an increasing human population, complicate and put at risk the management of Tanzania's wildlife (Kideghesho, Rija, Mwamende, & Selemani, 2013). It is likely that the lion populations that exist outside of protected areas will continue to decline (Riggio et al., 2013), making the existence of these protected areas all the more important. The trophy-hunting program in Tanzania provides a revenue source to maintain and manage protected areas from encroachment or elimination.

It is a widely supported belief that increasing the benefits for those most impacted by wildlife can increase tolerance of wildlife, especially of large carnivores (e.g. lions), by those communities who live with and bear costs of wildlife damage or injury (Bencin, Kioko, & Kiffner, 2016; Lindsey et al., 2013; Winterbach, Winterbach, Somers, & Hayward, 2012). The Service is encouraged by the recent action taken by the MNRT to amend the WMA regulations enabling them to receive a greater proportion of revenues returned on wildlife uses. Furthermore, the Service has received individual reports from a number of operators who are conducting anti-poaching and wildlife protection activities and investing in local community development.

Mr. Atkinson will hunt with a subsidiary of McCallum Safaris, which, as outlined below, will provide an indirect benefit to the lion population by generating revenue to help support a hunting block where lions are found and conserved. McCallum Safaris is required by Tanzanian law to pay directly a \$5,000 community development fee to the villages in the hunting area. The company has contributed significantly more than the base requirement, aiming to develop and maintain a strong relationship with these villages. These contributions have paid school fees, constructed classrooms, purchased books, and invested in solar power. In addition to direct financial assistance, the company also employs villagers in both permanent positions and short-term projects; conducts conservation workshops to educate the local residents of the importance of wildlife and hunting in their daily life, and the negative effects of poaching.

Therefore, based on the information available to the Service, the probable direct and indirect effect that issuing an import permit for this legally hunted lion would have on the species would be positive.

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

The government of Tanzania has implemented a number of policies and regulations to monitor and control the harvest of lions in the country. Therefore, the issuance of an import permit for a lion legally hunted in Tanzania does not conflict with any programs intended to enhance the survival probably of the species in Tanzania.

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

As previously stated, almost 40% of all remaining lions are found in Tanzania. The lions located within protected areas are under the legal authority of MNRT, as well as subjected to direct management activities by hunting companies. All indications show, that given the threats identified by the Service when listing the species as threatened under the ESA, the maintenance of these protected areas by hunting companies is actively addressing the three causes of lion decline: loss of habitat, loss of prey base, and human-lion conflict. The cost of operating a hunting block is considerable, and lion safaris are a large source of revenue for hunting companies. This revenue is, in part, what allows the company to first and foremost maintain a presence in this protected area, and subsequently maintain an anti-poaching program, and to aid in local community development, all factors which reduce the threats faced by lions.

With limited, controlled off-take of lions in a manner that mimics natural processes, the hunt proposed in Mr. Atkinson's application contributes to reducing the threat of extinction of lions in Tanzania. The utilization of hunters such as Mr. Atkinson in supporting the safari hunting industry is an important element of the success of lion management in Tanzania.

Therefore, based on the information available to the Service, the purpose for which this import permit would be issued will likely reduce the threat of extinction facing lions in Tanzania.

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

As with any discussion of hunting as a management tool, there are numerous opinions on the impact it would have on a species. From reviewing comments made during the listing process for lions, as well as information obtained through personal conversations and available literature, there is a general agreement that hunting, done properly and well managed, would not have an adverse effect on lion populations. Mimicking natural processes within the management program, such as maintaining pride hierarchy for long periods by leaving the alpha male in place, will better ensure the long-term survival of the species. Numerous researchers have stated that, while they may not support hunting in general, they see benefits that can be realized through a scientifically based hunting program for lions. There have been a large number of comments from some Non-Governmental Organizations (NGOs) and the public that oppose hunting any lions.

While these comments are an indication of concerns from some members of the public over hunting, they are not germane to our review process for this application.

Therefore, based on the information available to the Service, there is general support by scientists, individuals, and other organizations having expertise concerning lions, that legal and sustainable harvest and subsequent import of these lion trophies would not have an adverse effect on the species, but would further efforts to conserve the species in the wild into the future.

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

The long-term survival of lions in Tanzania is tied directly to the success, both ecologically and economically, of the protected areas. Based on our understanding of the hunting block allocation and management, companies must submit annual reports that address several criteria, including the maintenance of key prey populations, contributions to the local villages, improvement to infrastructure and protection of the environment, and anti-poaching operations.

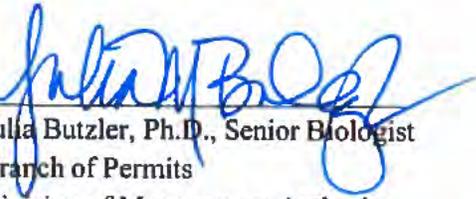
Therefore, based on the information available to the Service, the applicant will hunt on a hunting block that carries out their management practices in accordance with national regulations, having the expertise, facilities, or other resources available to them to successfully accomplish the objective stated in the application.

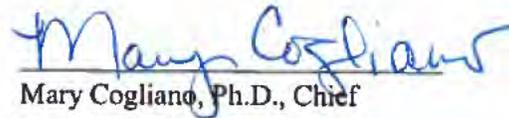
## VIII. Conclusion

As stated earlier, this application received by the Service for the import of a sport-hunted trophy lion from Tanzania has been evaluated on an individual basis. The major threat facing lions today is the loss of habitat to humans, and the subsequent consequences of living among humans (e.g., decrease of prey base due to bush-meat consumption, increase in human-lion conflict). The occupation and maintenance of hunting areas by hunting concessions -- an industry supported by U.S. hunters such as Mr. Atkinson -- protects lion and prey habitat through legal hunting by preventing conversion of such land to other uses, thereby contributing to the enhancement of this species. In addition, the financial benefits to local communities generated from lion safari hunting creates incentives for protection of lions, resulting in fewer lions lost as a result of human-lion conflict, which further contributes to enhancement of this species. Given the status of lions in Tanzania and the level of management and oversight provided to them, it appears that the harvest and import of this lion as a sport-hunted trophy meets the purposes of the Act. The applicant will hunt on a hunting block that is actively managing lions in a manner that will maintain the species in the block in a manner that mimics natural processes. The applicant attests in the application that the hunt will occur on a properly licensed hunting block, and this finding is contingent on the hunting block where the lion will be taken, having been properly licensed and fully in compliance with national and local regulations.

Therefore, with the information currently available to the Service and in accordance with the issuance criteria laid out above, the Service is able to make a determination that the import of the sport-hunted trophy of this wild lion will enhance the propagation or survival of the species in the

wild. Therefore, the Service is able to authorize the import of one male trophy lion taken from the wild in Tanzania, to Carl R. Atkinson, Orlando, Florida.

  
Julia Butzler, Ph.D., Senior Biologist  
Branch of Permits  
Division of Management Authority

  
Mary Cogliano, Ph.D., Chief  
Branch of Permits  
Division of Management Authority

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Applicant: Carl R. Atkinson

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**Permit Number: MA12548C-0**  
Effective: 05/24/2019 Expires: 05/23/2020

**Issuing Office:**

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

*Mary Cogliano*  
CHIEF, BRANCH OF PERMITS, DMA

**Permittee:**

**CARL R. ATKINSON**

(b) (6)

**ORLANDO, FL (b) (6)**

**U.S.A.**

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

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

**Reporting requirements:** Not applicable

**Authorizations and Conditions:**

- A. Authorized to import the sport-hunted trophy of one male African lion (*Panthera leo melanochaita*), taken in Tanzania for the purpose of enhancement of the survival of the species.
- B. Specimen may not be sold or transferred for any financial remuneration.
- C. **Trophy must have been taken during the 2019 hunting season.**
- D. Trophy must be accompanied by a valid trophy permit or hunting license issued by the government of Tanzania for the 2019 season.
- E. Trophy must be accompanied by a valid Convention on International Trade in Endangered Species (CITES) Appendix II export permit, source code "W", issued by the Management Authority of Tanzania.
- F. General conditions set out in Subpart D of 50 CFR 13, and specific conditions contained in Federal regulations cited above, are hereby made a part of this permit. All activities authorized herein must be carried out in accord with and for the purposes described in the application submitted. Continued validity, or renewal of this permit is subject to complete and timely compliance with all applicable conditions, including the filing of all required information and reports.
- G. The validity of this permit is also conditioned upon strict observance of all applicable foreign, state, local, tribal, or other federal law.
- H. Valid for use by permittee named above.
- I. Acceptance of this permit serves as evidence that the permittee understands and agrees to abide by the "General Permit Conditions" (copy attached).



**Permit Number: MA12548C-1**  
Effective: 06/11/2019 Expires: 05/23/2020

**Issuing Office:**

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

  
CHIEF, BRANCH OF PERMITS, DMA

**Permittee:**

**CARL R. ATKINSON**

(b) (6)  
ORLANDO, FL (b) (6)  
U.S.A.

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

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

**Reporting requirements: Not applicable**

**Authorizations and Conditions:**

- A. Authorized to import the sport-hunted trophy of one male African lion (*Panthera leo melanochaita*), taken in Tanzania for the purpose of enhancement of the survival of the species.
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- G. The validity of this permit is also conditioned upon strict observance of all applicable foreign, state, local, tribal, or other federal law.
- H. Valid for use by permittee named above.
- I. Acceptance of this permit serves as evidence that the permittee understands and agrees to abide by the "General Permit Conditions" (copy attached).

RCVD MAY 30 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  
(Appendix I of CITES and/or 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.  
**You may find instructions on how to make your application complete and help avoid unnecessary delays at the following link: .**

**Section A: Complete if applying as an individual**

1.a. Last Name <b>Mullins</b>	1.b. First Name <b>Thomas</b>	1.c. Middle Name/Initial <b>D.</b>	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**

Street Address (Street, P.O. Apartment #, Suite #, or Room #, no P.O. Boxes)

(b) (6)

1.b. City <b>Palm Beach Gardens</b>	1.c. State <b>FL</b>	1.d. Zip code/Postal code <b>(b) (6)</b>	1.e. County/Province	1.f. Country <b>USA</b>
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 check or money order payable to the U.S. FISH AND WILDLIFE SERVICE in the amount identified on page 2, 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 <b>Title 50 Part 13 of the Code of Federal Regulations</b> and the other <b>applicable parts in subchapter B of Chapter I of Title 50</b> , 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>(b) (6)</b> <b>5/20/19</b>

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:

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

- 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. 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:

- 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:

- 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:

*Tanzania: Inyonga Game Controlled Area East*

- b. Date wildlife was hunted:

*26 July 2017*

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

Malagarasi Hunting Company  
Meherdard S. Karambeki

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]:

Kilombero North Safaris Ltd. office  
Dar Es Salaam, Tanzania

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: Kilombero North Safaris Ltd.  
Address: P.O. Box 4394  
City: Dar Es Salaam  
State/Province: Tanzania  
Country, Postal Code:

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?

N/A

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?

N/A

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

N/A

**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 a leopard trophy, I understand that my client may only import two leopard 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 a leopard trophy, I understand that I may only import two leopard trophies in ~~one~~ calendar year.

Applicant's signature: (b) (6) \_\_\_\_\_ 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.*

12. 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).

ORIGINAL  
14187

THE UNITED REPUBLIC OF TANZANIA  
MINISTRY OF NATURAL RESOURCES AND TOURISM



IN # 3049670  
APP: 2004956

GAME HUNTING PERMIT

RETURN DATE: Monday, August 28, 2017  
PERMIT NO. 2004957

Station DAR ES SALAAM Start Date July 18, 2017 End Date August 07, 2017 Package Type 21 DAYS Extra Days: 0

This RESIDENT'S / VISITOR'S Permit is Granted to THOMAS D. MULLINS of Address (b) (6) Passport No. (b) (6)

Who holds Weapon (Type) RIFLE Calibre 416 300 Maker's No: (b) (6) Weapon owner & Address MALAGARASI HUNTING SAFARIS LT

Licence No: NA Dated 23-Jun-2016 Issued At INYONGA GCA E C.A.R No: (b) (6)

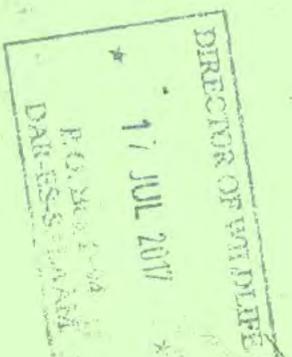
owned by MALAGARASI HUNTING SAFARIS LTD PH: MEHERDARD S. KARABECK, PH CAT. LICENSE No.

Additional Blocks

SPECIES	No.	SAME SPECIES BOUGHT THIS YEAR
1 BARBON YELLOW	2	
2 BURNING AFRICAN CAMEL	3	
3 BUSHBUCK CHORE	1	
4 BUSHBUSH	1	
5 CIVET AFRICAN	1	
6 CHOCODILE NILE	1	
7 DIBDIK KIRK'S	1	
8 DOVE	5	
9 DOCK	5	
10 DUCKER COMMON	1	
11 DUCKER HARVEY'S RED	1	
12 ELAND LIVINGSTONES	1	
13 FRANCO-TILLY	5	
14 GREGG	5	
15 GREAT BLOOMCHERD	1	
16 GUINEAFOWL	5	
17 HARTEBEEST LICHTENSTEIN'S	2	
18 HIPPO	1	
19 HYPANA SPOTTED	1	
20 HYPANA SCOTTISH	2	
21 JACKAL SIDE STRIPED	1	
22 KUDU GREATER	1	
23 LEOPARD	1	
24 LION	1	
25 ORIBI COMMON	1	
26 OSTRICH	1	
27 PORCUPINE CHESTED	1	
28 RAYET (HONEY BADGER)	1	
29 REEDBUCK BROWN	2	
30 ROAN ANTELOPE	1	
31 SABLE ANTELOPE ROOSEVELT	1	
32 SERVAL CAT	1	

Signature of Holder (b) (6)

Signature of Issuing Officer & Official Stamp



- The Hunting Permit must be surrendered to the Director of Wildlife Division within 30 days of expiry or immediately the Professional Hunter returns from safari
- This Permit does not entitle the holder to capture animals, be in possession of live animals or carry on a live animal business of a Trophy dealer.
- Maximum number of animals must not be exceeded without the written authority of the Director of Wildlife
- A Hunter must obtain Certificate of Ownership for all trophies he wishes to keep, transfer.
- A Professional Hunter conducting a safari must carry his/her PH License during the entire safari
- A Professional Hunter conducting a safari must get a guide or obtain letter of authority from the Director of Wildlife to go out alone
- For weapons indicate the heaviest rifle in the case of big game or shotgun in the case of birds or others in the case of fish.
- A Professional Hunter conducting a safari must take all measurements and or (b) (6) and record them in the data sheet provided immediately after an animal shot and (b) (6) cases.





MINISTRY OF NATURAL RESOURCES AND TOURISM  
WILDLIFE DIVISION

July 17, 2017 6:42:42 pm

PERMIT NO. 2004957

CLIENT NAME THOMAS D. MULLINS

14187

COMPANY MALAGARASI HUNTING SAFARIS LTD

PH NAME MEHERDARD S. KARAMECK,

PH LICENSE NO

REGISTER OF GAME KILLED (INCLUDES WOUNDED ANIMALS)

SPECIES	No.	AREA WHERE HUNTED	WEAPON USED	DATE	TIME	SEX	GPS COORDINATES	LENGTH OF HORNS/ANIMAL	OR WEIGHT	REMARKS
1. ROYAN ANTELOPE	30	NYOROGA G.C. AREA	A16	26/7/2017	03:08M	M	S 06° 36' 44" E 038° 25' 17"			
2. STONE ANTelope	31	"	A16	21/07/2017	08:00M	M	S 06° 38' 99" E 038° 52' 66"			
3. KENYA BUSHBUCKS	36	"	300	22/07/2017	7:25AM	M	S 06° 34' 40" E 033° 04' 51"			
4. BUSHBUCKS	2	"	300	22/07/2017	11:35AM	M	S 06° 00' 983" E 032° 14' 464"			
5. BUSHBUCK	1	"	300	22/07/2017	05:10M	M	S 06° 36' 300" E 032° 57' 576"			
6. HART BEES	17	"	300	23/07/2017	1:51M	M	S 06° 20' 909" E 033° 03' 286"			
7. BULLFRONT	2	"	A16	23/07/2017	1:30M	M	S 06° 32' 138" E 032° 20' 768"			
8. BUSHBUCK	2	"	A16	23/07/2017	1:45M	M	S 06° 23' 904" E 032° 50' 665"			
9. KUDU	24	"	A16	26/07/2017	1:51M	M	S 06° 38' 097" E 032° 54' 976"			
10. EXMUD KIRINDSBUKE	12	"	A16	27/07/2017	1:10M	M	S 06° 39' 288" E 033° 04' 487"			

SIGNATURE OF THE HUNTING CLIENT

SIGNATURE OF THE PROFESSIONAL HUNTER

SIGNATURE OF WILDLIFE OFFICER INCHARGE

DECLARATION

We the above signatories hereby declare that the register of animal hunted including wounded or wounded during the validity of the

SIGNATURE OF THE HUNTING CLIENT

SIGNATURE OF THE PROFESSIONAL HUNTER

SIGNATURE OF WILDLIFE OFFICER INCHARGE