

THE CHALLENGES OF TROPHY IMPORTING & EXPORTING

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Coppersmith Global Logistics

- ▣ Been in business since 1948
- ▣ 4 Generations
- ▣ 9 Office Locations
 - Los Angeles, San Francisco, Portland, Seattle, Dallas, Houston, Atlanta, Chicago and New York
- ▣ Clearing Hunting Trophies since 1992
- ▣ 2 Dedicated Specialists in each office

Topics of Conversation

- ▣ **Documents being LOST by Airlines**
 - Cause and Effects
 - Requirements for Replacements
 - ▣ Plains Game vs CITES
 - Suggestions for NEW Practices
- ▣ **Length of Time for Issuing of Permits in the US**
 - Import Permits for CITES
 - Export Permits for CITES
- ▣ **Current Status for Bontebok Permits**
 - Huge confusion – Hunters, Outfitters and Taxidermist
- ▣ **Communication –**
 - Brokers vs Non Brokers

Topics of Conversation

- ▣ Inconsistencies Between Ports of Entry
 - Number of Hunters Allowed in a Crate
 - USDA physically inspecting of 100% of Crates in Atlanta
 - Mandatory Quarantine at Airline for Crates issued a 1678
 - 1678's Being on ALL Unfinished Trophies in the Texas Ports of Entry
 - 31-77 - USFWS Declaration for Export
 - Major Concern of PORT SHOPPING

Documents Being LOST by Airlines

- ▣ Current regulations state in all ports that the ORIGINAL Documents must travel with the freight during its transit.
 - Due to high volumes of freight and often times the freight traveling through several ports, we are having major issues with these documents being misplaced or completely lost. Airlines are not being held accountable
 - ▣ Shipments will NOT be cleared without the ORIGINALS being presented to USFWS
 - ▣ This is causing huge delays in clearances and in most cases causing very expensive storage charges being presented to the HUNTER and NO fault of their own.
 - ▣ If shipments are not cleared within 15 days of arrival they are required to be sent to the General Order warehouse to be stored until replacement documents can be acquired. Once again causing very large storage bills.
 - If not cleared within 1 year or arrival they are then sent to auction
 - This is most difficult when CITES Permits are lost
 - USFWS must give authorization to have replacement permits issued which does not always happen at which point the only option is to Re-Export freight to country of Origin.
 - Some countries will NOT re-issue CITES Permits

Documents Being LOST by Airlines

▣ Solutions

- Allowing copies of documents and permits to be sent with the freight while in transit and ORIGINAL be sent directly to the clearing agent by courier or certified mail.
 - ▣ USFWS is the only agency that original documents are given to at the time of clearance.
 - ▣ Small additional cost to Hunter to ensure they are not lost.
- Document Imaging System on ACE
 - ▣ US Customs new system ACE
 - Automated Commercial Environment
 - Document and Permits can be scanned into this system where all active agencies can view the original if needed.
 - USDA and USFWS are still in testing phase

Length of Time for Issuing of Permits in the US

▣ US CITES Import Permits

- Permits for CITES 1 Import Permits are suppose to be issued within 90 of receiving the application.
 - ▣ In the past we had no issue of getting these permits within this time frame. Currently they are taking much longer then this.
 - ▣ As a result we have many unhappy Hunters that do not understand the delays.
 - ▣ Some recent permits for Leopards have taken over a year to receive. This often causes issues on the exporting side in foreign countries as their Export CITES Permits are expiring and having to be reissued.
 - Additional costs to the hunter

Length of Time for Issuing of Permits in the US

- ▣ US Export Permits
 - CITES Permits
 - ▣ We have been exporting Hunting Trophies for years and never ran into delays.
 - ▣ Currently it is taking as long as 6 months to have permits issued by USFWS Headquarters.
 - ▣ Again causing huge delays and many unhappy foreign hunters.
 - ▣ Causes of these new delays are uncertain as that is not been revealed to us.

Current Status for Bontebok Permits

- ▣ There is major confusion on the issuing of Bontebok permits.
 - This extends to the Hunter, the Outfitters, Taxidermists and Foreign Shippers.
 - Most of these animals were taken well before the lawsuit with SCI and NRA with no notice of any restrictions on them being imported.
 - Currently we have a large number of hunter that have been waiting almost 3 years for their permits. USFWS is not stating a ban on them, only that they are being issued on a case-by-case basis. Meanwhile we have not seen a single 1.
 - Additional costs are being placed on hunters for storage by foreign taxidermist. Many hunters have chosen to send other parts of their shipments separate while waiting for their import permits. This is also causing additional cost.
 - Request that USFWS does issue Import Permits for them.

Communication

▣ Brokers

- Having great relationships with the agencies allows us to do our job well. Most of our employees have personal relationships with their inspectors as most of them have been doing this for years.
- We are also able to obtain needed information from USFWS Headquarters in a timely manner. Usually within 24 hours of request. Again allowing us to do our best in aiding our clients.
- As in all relationships, COMMUNICATION is KEY! Thank you

▣ Hunters

- We are constantly hearing from hunters themselves that the communication with USFWS is not very good and we are often approached because they are not able to get the information that they need.

Inconsistencies Between Ports of Entry

- Although the regulations facing each Port of Entry are written the same, the way that they are being enforced are different in each port.
- The way they are enforced is based on the Port Director in each Designated Port of Entry
- This causes confusion for all parties involved in these shipments
- One of our largest problems, especially having offices in so many Ports.
 - Most brokers handling trophy shipments have only 1 location.

Inconsistencies Between Ports of Entry

- ▣ The number of hunters that maybe in a crate at the time of entry. Enforced by US Customs
 - ▣ Currently in our 9 ports, 5 allow their to be multiple hunters in a single crate and 4 of them require each hunter to be in a separate crate.
 - Individual Permits and Documentation is required for each hunter in ALL Ports
 - Ports allowing Multiple Hunters
 - Atlanta, New York, Chicago, San Francisco & Seattle
 - Ports NOT allowing Multiple Hunters
 - Los Angeles, Portland, Dallas and Houston
 - Only exception is an adult with a hunter under the age of 18
 - Once ACE becomes official, all ports will be changed to single hunter in a crate.

Inconsistencies Between Ports of Entry

- ▣ USDA is now required to open and inspect 100% of all crates in the port of Atlanta
 - Due to some crates getting through that were claimed as Finished Trophies that were NOT and the discovery of undeclared animals, there is new enforcement requiring ALL crates to be inspected.
 - ▣ Being that USDA will NOT open crates themselves Brokers are now required to send staff to each airline to meet with USDA to inspect crates.
 - This is causing additional costs to be presented to hunters for actual clearance and additional storage cost due to delays in release from USDA
 - This is also causing major headaches for brokers that do not have offices in Atlanta
 - ▣ This is causing foreign shippers to “Port Shop” and avoid Atlanta as Port of Entry.
 - Inspections should go back to original practices or should be enforced in ALL Ports to avoid SHOPPING

Inconsistencies Between Ports of Entry

- ▣ Mandatory Quarantine at Airlines for shipment containing 1678 animals or crates that have 1678s issued on them
 - 1678s are issued on crates that contain Swine, Humanoid or Birds
 - ▣ Most common Bushpig/Warthog, Baboon/Monkeys & Ostrich
 - ▣ These shipments are required to be sent to a USDA Approved Establishment
 - These shipment were once allowed to be moved to a bonded warehouse upon USDA inspections and release.
 - This is causing large storage bills for hunters as Airlines only give 2 to 3 days of storage before daily rates go into effect
 - Our company is in the process of making ALL our warehouse USDA Approved Facilities. Large costs to Brokers

Inconsistencies Between Ports of Entry

- ▣ As of recently, Texas Ports of Entry (Dallas & Houston) are now issuing 1678s on ALL trophies that are Unfinished
 - 1678s should only be issues on UNFINISHED SKINS of the previously mentioned animals. 1678s are issued on animals with concern of disease. This is the practice in every other port.
 - ▣ Example - Unfinished trophies coming from Argentina that have the first port of entry being Houston are now being issued 1678s.
 - ▣ This is causing a major confusion for Hunters and foreign shippers when they are advising customers.
 - ▣ Also causing difficulty for brokers trying to explain to customers why they are going to face these additional costs.
 - ▣ Seems to be that USDA in Texas is trying to make more taxidermists to become USDA Approved.
 - ▣ Additional costs and required practices for the US taxidermist.

Inconsistencies Between Ports of Entry

- ▣ In the Port of Los Angeles, Export documents are only able to get their 31-77 release once the shipment has actually been delivered to the Airline vs getting its release on the day of travel.
 - This is not allowing us to be able to put the actual release from USFWS and often times makes it impossible to send actual document with the shipment. We are having to scan and send color copies after shipment has left.
 - This can cause major delays or even stopping the freight in route if it is traveling through other countries on its way to the final destination.
 - All other ports issue release prior to the arriving at the airlines. Being enforced by the Port Director.

Thank you !!



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