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June 14, 2018

Submission from the Wildlife Conservation Society (WCS) to the International Wildlife Conservation Council

This paper is submitted by WCS to the International Wildlife Conservation Council (IWCC) on the occasion of its public meeting on June 19th, 2018, at the U.S. Fish and Wildlife Service's Southeast Region Headquarters Building in Atlanta, GA [Docket No: FWS-HQ-R-2018-N083; FXGO1664091HCC0-FF09D00000-189].

WCS appreciates the opportunity to provide input to the IWCC. We do so by providing answers to potential questions of Council members, specifically to the following:

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1. What is WCS's recommendation regarding the remit of the IWCC?

WCS reiterates the recommendation it made last November that the IWCC examine how the United States can contribute globally to the range of wildlife conservation strategies, of which trophy hunting is one, without focusing solely on trophy hunting (see attached letter to U.S. Secretary of the Interior Zinke dated November 24, 2017). We believe that the IWCC would be most effective if it encouraged the U.S. Government to continue to work to enhance wildlife conservation across the globe, particularly of threatened and endangered species, using all of the approaches it has developed through decades of global leadership in this arena.

2. How does WCS define trophy hunting?

WCS follows the "IUCN Species Survival Commission Guiding Principles on Trophy Hunting as a Tool for Creating Conservation Incentives"¹ by defining trophy hunting as hunting that is:

- Characterized by hunters paying a high fee to hunt an animal with specific "trophy" characteristics, and the hunters securing a trophy;

- Managed as part of a program administered by a government, community-based organization, NGO, or other legitimate body;
- Characterized by low off-take volume; and,
- Usually (but not necessarily) undertaken by hunters from outside the local area (often from countries other than where the hunt occurs).

3. How might trophy hunting contribute to conservation?

When appropriately governed and managed, based on sound science and adaptive management, trophy hunting can potentially be an important conservation tool, providing value and local incentives to maintain wild lands and to conserve often threatened species. For example, across Africa, trophy hunting areas cover an estimated 1.4 million km² -- 22% more than national parks. In Tanzania, 42,000 km² (4.4% of the country) is within national parks whereas 140,000 km² (14.7%) is within game reserves, and these game reserves are dependent on hunting revenue; if that revenue were to be lost, a high proportion of that land would probably be converted to agriculture or other uses. The amount of revenue generated by trophy hunting (and its allocation) is debated, but is estimated to exceed \$200 million in gross revenue annually across Sub-Saharan Africa, although the proportion of revenues that accrue to local communities or government management agencies is variable. In some countries, support from relevant local communities for wildlife conservation is dependent on trophy hunting, e.g., in conservancies in Namibia, and certain rural communities in Pakistan.

4. What are the necessary conditions for trophy hunting to be an effective conservation strategy?

To be an effective conservation strategy (that is, one that contributes positively to conservation), it is necessary for trophy hunting to be:

- Biologically sustainable. Trophy hunting should not deplete target wildlife populations, lead to loss of biological diversity, or interfere with ecosystem services;
- Well managed. Management should be information-based, transparent and adaptive;
- Operate under good governance conditions; and,
- Create effective social and economic incentives for national and local governments and local communities to support conservation of those lands and their full complement of species.

5. To be an effective conservation strategy, how should trophy hunting be managed?

- Management should ensure that any hunting is biologically sustainable, and does not lead to a decline in wildlife populations (the target species or others);
- Offtake levels (quotas) and practices (e.g., trophy size, animal age and sex) should be based on high quality scientific information and monitoring, and managed adaptively (i.e., with appropriate feedback loops between quotas and population responses, according to the best available data. (E.g., Information on population declines would lead to decreased quotas.); and,
- The management structure should be transparent, have clear management responsibilities and accountability, allocate revenue in a way that is clear and transparent, and seek to eliminate any opportunities for corruption.

6. To be an effective conservation strategy, what is the necessary governance regime?

- To be effective as a conservation strategy, a fundamental condition is that hunting must operate under a strong rule of law with enforcement as a deterrent to non-compliance;
- Programs should include participation of relevant stakeholders and take account of land tenure, access rights, regulatory systems, traditional knowledge, and customary law;
- Hunting programs should not be linked to or facilitate illegal wildlife trade;
- National-level enforcement should be strong, including prosecution of non-compliance, with penalties high enough to act as a deterrent; and,
- Hunting programs should respect local cultural values and practices.

7. To be an effective conservation strategy, what are the necessary social and financial incentives?

Trophy hunting should provide a net conservation benefit, producing income, employment and other benefits to local communities that lead to local and national support for conservation, and tolerance of local communities for living with large animals that might threaten their livelihoods, livestock, crops or welfare.

8. When does trophy hunting not contribute to conservation?

- Trophy hunting is poorly managed in many countries, does not contribute to conservation, and should not be supported by the U.S. when:
- Offtake levels exceed levels that are biologically sustainable (based on total population, and population demographics). This leads to species declines, negative ecosystem impacts, and ultimately the loss of the very ecological and economic benefits that these species can provide;
- Regulations are weak and often poorly enforced. Unfortunately, the trophy hunting industry is notoriously corrupt in too many countries. This results in animals being hunted in inappropriate numbers, demographic classes, and locations, inevitably resulting in species declines;
- The high cost of safari hunting trips (far beyond the cost of permits to the hunter) creates perverse incentives to increase quotas and offtake above that which is sustainable;
- Trophy specimens find their way into the illegal wildlife trade; or,
- Weak governance and management results in funds not going to support conservation and to provide benefits to local and indigenous communities. A breakdown in benefit sharing reduces incentives to conserve wildlife; local communities who do not benefit but see wealthy outsiders doing so lose their incentive to conserve species, which leads to their own over-exploitation of the species and their habitats.

9. How do U.S. laws contribute positively to management of international trophy hunting?

The strongest legal wildlife conservation law available to the U.S. is the Endangered Species Act (ESA). Under this, the U.S. regulates and scrutinizes importation and interstate commerce in live animals, and wildlife parts and products, from ESA-listed species. That scrutiny is in addition to U.S. permit findings pursuant to CITES. The ESA provides the U.S. with the ability to evaluate the trophy hunting programs of range States, and approve importation from countries meeting the requirements in U.S. regulations implementing the ESA. The ESA thereby incentivizes good management by range States, and helps ensure that U.S. hunters positively contribute to the conservation of hunted species. WCS therefore strongly urges the IWCC to recommend that the

Administration oppose efforts in Congress to remove species not native to the U.S. from those eligible to be listed for protection under the ESA.

10. What are WCS's recommendations to the IWCC?

Internationally-recognized and applied high standards and best practices are essential if the trophy hunting industry is to play a positive role in supporting conservation, and not undermine it. The U.S. currently operates high standards, both for trophy hunting within the U.S. and for importing practices, and should continue to do so.

Some countries choose not to consider trophy hunting as a conservation tool, which should be respected. The United States has extensive experience on the issue, both domestically and internationally, and can continue to be a global leader in this area.

In addition to maintaining the continued listing under the ESA of species not native to the U.S., WCS recommends that the IWCC supports policies that demonstrably incentivize best practices for trophy hunting, particularly as relates to support for programs in other countries and importation into the U.S. of trophies of protected species. We urge the IWCC to not support any amendments to the ESA or other statutes, but rather provide guidance in the issuance of CITES non-detriment findings and ESA enhancement findings, specifically:

- Any U.S. actions or permit decisions relevant to the importation of trophies into the U.S. should incorporate all of the above elements, including a provision stating that any trophies imported into the U.S. must only come from operations and countries that fully implement international regulations and meet the highest standards;
- The U.S. should work with other countries to bring their laws and regulations up to an equivalent level, both in policy and in practice, and do so by providing incentives and disincentives to doing so (e.g., through permit issuance findings regarding from which country trophies can be imported into the U.S., funding support for projects, and for which species); and
- If U.S. citizens and residents are hunting abroad, they should be encouraged to do so only in operations and locations that meet these criteria in full, and mechanisms should be considered to ensure that they do so.

11. What are WCS's mission and *modus operandi*?

WCS's mission is to save wildlife and wild places worldwide through science, conservation action, education, and inspiring people to value nature. To deliver on this, WCS works with local and national governments, intergovernmental organizations and treaties, international and national non-governmental organizations, local and indigenous communities, and other partners in more than 60 countries globally.

¹ IUCN SSC (2012). *IUCN SSC Guiding principles on trophy hunting as a tool for creating conservation incentives*. Ver. 1.0. IUCN, Gland, Switzerland.