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November 12, 2021

Department of the Interior  
U.S. Fish and Wildlife Service  
Attn: Chief Mary Cogliano  
Division of Management Authority (DMA)  
Branch of Permits, MS: IA  
5275 Leesburg Pike  
Falls Church, Virginia 22041-3803  
E-File

**Applicant: Gerald Koppes**  
**Re: Import Permit Application for Botswana Elephant Trophy**  
**Date of hunt: June 15, 2021**

Chief Cogliano,

Enclosed is an import permit application and supporting information for a personal sport-hunted elephant trophy taken by Mr. Gerald Koppes. Mr. Koppes hunted with professional hunter Jeffrey Rann and operator Rann African Adventures in Controlled Hunting Area (CHA) CT4 of Botswana in 2021.

### **National Status and Management**

The Botswana Government reopened controlled hunting in 2019, initially issuing quotas for 2020 but postponed the reopening and rolled forward the quotas until to April 6, 2021, due to the COVID-19 Pandemic. As a corollary to reopening elephant hunting Botswana completed a number of beneficial management instruments that will advance and further secure the survival of elephant.

Botswana has completed a new National Elephant Management and Action Plan. This replaces the country's dated 1991 Management Plan.

The Botswana management authority, the Department of Wildlife and National Parks (DWNP) of the Ministry of Environment, Natural Resources, Conservation and Tourism (MENT), has also completed an up-to-date elephant NDF with 2 annexes including information addressing how controlled hunting in Botswana provides enhancement of survival of elephants, attached.

One of the addendums to the NDF applies the IUCN SSC *Guiding Principles on Trophy Hunting as a Tool for Creating Conservation Incentives* (often cited by USFWS as useful indicators of benefits of regulated hunting) to Botswana's evolving elephant hunting program which demonstrates the conservation benefits of the hunting.

The National Management Plan creates a National Elephant Coordinator position who has already been appointed. The National Elephant Coordinator coordinates elephant management in Botswana and works with a National Elephant Committee formed by representatives of communities, private landowners, safari operators, NGOs, and independent researchers.

Together with the new National Management Plan, the DWNP has also approved the Priorities and Budget for the first year of its implementation.

At the onset of the reopening of controlled hunting, DWNP also adopted *Hunting and Escort Guidelines 2019*, streamlining all the processes before and after each hunt and the functions and role of the DWNP Escort Guides, which are mandatory for each hunt. Furthermore, the Guidelines include reporting forms for elephant hunts that are an important monitoring tool. Interestingly, those Guidelines provide that controlled hunting will take place in areas where there will be no adverse effects on photographic tourism, page 6.

Botswana's elephant hunting was reopened after an extensive, country-wide public consultation process. After an imposed five-year moratorium on hunting a review began in 2018 with the selection of a Cabinet Sub-Committee on Hunting Ban Social Dialogue. The review included a year long process of national consultative meetings with community members, local authorities, and stakeholders that culminated with the overwhelming decision to re-open controlled hunting. See the attached documents "Media Statement on the re-opening of hunting", and the Declaration of open season on hunting, The National Management Plan and the Elephant NDF. The participatory process itself should serve to further motivate and incentivize elephant conservation.

Botswana's elephant population has grown to be the largest in the world. It is secure and stable or growing.

### **Specific Area Management**

The area in question, CT4, is a Special Elephant Quota Area (SEQ). Botswana's SEQ areas are NG8, NG9, NG11, NG35, CT4, and CT7. See pages 29 to 32 of the NDF for an explanation of the 4 kinds of areas/quotas in Botswana.

Special elephant quotas were allocated in these areas with high incidences of human elephant conflict to limit the interference of elephants in and around human settlements to create an opportunity for communities to benefit from wildlife sustainable utilization. Funds accrued from the auctions of Special Elephant Quota areas are allocated to the Conservation Trust Fund: project proposals are submitted to the CTF and are directed towards Government and community projects within the elephant range. Proposals are also considered at mitigating the impact of COVID-19 on Community Trusts and to resuscitate those Community Based Organizations (CBOs) that were negatively affected by the hunting moratorium from 2014-2019.

In 2020, a special conservation auction of hunting licenses for elephant quota was held by the Ministry of Environment, Natural Resources, Conservation & Tourism (MENT) to raise money for the Conservation Trust Fund (CTF). The Ministry auctioned hunting license packages of 10 elephant for 7 CHAs with high human-elephant conflict. (Incidentally, the auction for one area

(CT29) did not take place.) Jeff Rann was the highest bidder in the auction for CT4 paying the equivalent of approx. \$436,000.00 U.S. Dollars (BWP 4.7 million at 2020 average rate of exchange) for the auctioned elephants. Due to the COVID-19 Pandemic the hunts were postponed for one season and the packages were increased to 12 elephants by DWNP, adding a further 2 licenses in each area. The funds of the auction accrued to the Conservation Trust Fund (CTF) for the implementation of related community projects and programs. See attachments for details on the auction, invoices, and more about the Conservation Trust Fund.

The hunting season of 2021 in Special Elephant Quota Areas runs from April 6, 2021, to December 31, 2021. The COVID-19 pandemic and one year time constraint has limited operator activities.

### **Operator Company Profile**

Jeff Rann owns and operates African Adventures and Destination South Safaris and has operated in Botswana for over 30 years including during the hunting closure period. His two companies operate leased concession CT1 and Special Elephant Quota Areas CT4 (auctioned at BWP 3.6 million) and CT4 (where applicant Gerald Koppes' hunt occurred). See maps attached. Jeff operates both photographic and hunting areas, but the areas are operated separately by plan.

Jeff has been awarded both the C.J. McElroy and PH of the Year Awards of Safari Club International in recognition of his years of contributions and conservation services to the safari industry. Evidence of his conservation ethic include his founding of the multi-million-dollar *RANN-FORCE LIONS FOREVER TRUST FUND* with Conservation Force and the maintenance of wildlife boreholes in CT1 the full period of years that hunting was closed in that long term lease area.

### **Operator Enhancement**

#### **Community Participation and Collaboration**

Special Elephant Quota Areas like CT4 in this instance are intended to provide community benefits through the Conservation Trust Fund wherein all SEQ area fees are paid.

The initial length of the leases in SEQ areas was one year. One or more of these areas may be motivated to form community trusts but for the current, opening year the quotas for each such area are aimed at injecting potential community forex to reduce the high level of human elephant conflicts.

Despite the above, the current winners of the 2020 auctions are improving relationships with communities living in the Special Elephant Quota areas: since CHA's with SEQ are considered marginal tourism areas, communities are encouraged to consider funding options through the CTF to finance and develop other wildlife-based projects to supplement local livelihoods.

In CT4 Operator Rann African Adventures (RAA) educated community members about the Conservation Trust Fund and the benefits available to them from the Fund. Rann contracted Professor Mbaiwa, a renowned CBRNM expert, to act as the community liaison with all the communities in or near hunting areas around NG9 and CT4: regular meetings will be held with community leaders to address community/operator partnerships and beneficiation schemes. See the attached CV for Professor Mbaiwa, the contractual agreement between Rann and Professor Mbaiwa, and the minutes of the first community meeting with Professor Mbaiwa.

### Meat Benefits

In line with Botswana's Hunting and Escort Guidelines 2019, Rann African Adventures delivers the full body of each elephant taken on quota to the local communities. Jeff designed and had built a special trailer to haul the full, intact body of all elephants taken on quota to the local people. See attached photographs.

The value of meat provided to the community is calculated based on the following:

The value of game meat is equal to ration meat (cooking meat with bones), currently selling for P30/kg.

A conservative estimate of meat harvested from an elephant bull is 1,400 kg, at P30/kg. This is P42,000 of meat per elephant. The meat value of 10 elephants is P420,000. (Equivalent to approx. \$38,000 US Dollars).

### *Extra Poaching Control*

Aerial Surveillance is an integral adjunct of Rann African Adventure's conservation effort. As an extra measure Rann has contracted a helicopter service at the cost of over \$85,000.00 US Dollars to enhance resource monitoring (including detection and reporting of poaching) in his three areas. The focus is on human activity in the area and will concentrate on areas with pans, major game trails and road networks, as well as marginal areas around the perimeters. The flights will also be used to monitor the ecological health and condition of the area such as water sources, flood levels, fire damage, and monitoring of any active fires. This is in addition to reporting poaching and coordinating with the DWNP and Botswana Defense Forces (BDF) anti-poaching patrols which are conducted year-round. See the attached descriptive information, service contract, and invoice for helicopter services.

In summary, this application package documents the extraordinary benefits of this applicant's hunt to the long-term survival of Botswana elephant. Of special note is the operator's long-term commitment to Botswana and its elephant, aerial surveillance, expert guided community networking, direct meat delivery system, and substantial funding of the Conservation Trust Fund of the Botswana Department of Wildlife and National Parks.

Please contact me if any more information is needed.

Respectfully,

A handwritten signature in black ink, appearing to read "John Jackson" with a stylized flourish at the end.

John Jackson  
Conservation Force

CC: Gerald Koppes  
Jeff Rann

Enclosed:

- a. Import permit application for an elephant trophy taken in CT4
- b. Notice of Representation
- c. Botswana Hunting Permits
- d. Elephant Hunting Report
- e. Ivory Ownership Certificate
- f. Trophy Documentation and Age Determination
- g. Operator Enhancement Report
  1. Elephant Trailer Documentation, Specifications, Pricing, and Photos
  2. Aerial Surveillance and Ecological Information
  3. Community Memorandum of Agreement
  4. Community Meetings with Community Liaison and First Meeting Notes
  5. The Elephants of Northern Botswana Age Determination, Age and Size of Hunting Trophies
- h. Maps for CT4
- i. Media Statement on the re-opening of hunting
- j. Declaration of Opening of Hunting
- k. Elephant Management and Action Plan – 2021-2026
- l. NDF for Botswana elephants
- m. Guidelines for the Wildlife Conservation Trust Fund
- n. Wildlife Hunting Quota 2020
- o. Special Elephant Quota Auction and additional quota for 2021 due to COVID-19
- p. Wildlife Conservation and National Parks Act 1992
- q. Hunting and Escort Guidelines 2019
- r. Hunting and Licensing Regulations 2001
- s. Wildlife Policy 2013
- t. CBRNM Policy 2007

## 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 included in 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 NAMIBIAN SOUTHERN WHITE RHINOCEROS TROPHIES.

**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.

- **Complete all questions on the application.**
- **Mark questions that are not applicable with "N/A".**
- **If applying for more than one trophy species, be sure to answer questions 4, 5, and 6 for each trophy.**
- **If importing trophies from more than one country, you must submit a separate application for each shipment in order to obtain separate import permits.**

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

Gerald Koppes - [REDACTED] Texas 78257

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

John Jackson or Aimee Korver (504) 837-1233 permits@conservationforce.org

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

No       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.

Loxondonta africana, African elephant

- b. Sex (if known).

Male

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

- a. Country and location (e.g., 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 ANIMAL HAS ALREADY BEEN TAKEN**, please include the following:

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

CT 4, Botswana

- b. Date wildlife was hunted:

June 15th, 2021

c. Approximate age of animal:

d. Name of hunting outfitter, safari company, and/or professional hunter you hunted with:

Rann African Adventures Pty Ltd.

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

Mochaba Developments Proprietary Limited Private Bag 098 Maun, Botswana

7. Please provide a copy of any applicable foreign government permits, licenses, or tags, 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).

See attached

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: Debbie Peake  
Business Name: Mochaba Developments Proprietary Limited  
Address: Private Bag 098  
City: Maun  
State/Province: Botswana  
Country, Postal Code: Botswana

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 have hunted when making the required findings, **please include the Operator Enhancement Questionnaire** provided in Annex I filled out by the operator or professional hunter of the concession in which you hunted or will hunt. You may attach an updated report of operations from this concession in lieu of this questionnaire if information regarding the enhancement of the survival or propagation of the species in the wild is made available in the report.

10. If required by the country in which you hunted, please include the government-endorsed hunter return form.

See attached

11. Provide the name of the operator, safari company, or professional hunter with whom you hunted or will hunt.

Name (Company/Professional Hunter): Jeff Rann  
E-mail: rannsafaris.maun@gmail.com  
Phone number: (830) 426-3476

**CERTIFICATION STATEMENT** (original signature must be provided for either 11 or 12 below)



12. If you are a broker or taxidermist applying on behalf of a U.S. hunter or foreign national, provide documentation to show you have **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: \_\_\_\_\_

13. 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**).

Applicant's signature: \_\_\_\_\_ Date: 10 May 2021

*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.*

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

# CONSERVATION FORCE

Department of the Interior  
U.S. Fish and Wildlife Service  
Attn: Chief Mary Cogliano  
Division of Management Authority (DMA)  
Branch of Permits, MS: IA  
5275 Leesburg Pike  
Falls Church, Virginia 22041-3803  
E-File

**Applicant:**            **Scott Limmer**  
**RE:**                    **Import Permit Application for BOTSWANA Elephant Hunting Trophy**  
**DATE of TAKE:**      **June 11, 2021**

Chief Cogliano,

Enclosed is an import permit application and supporting information for a personal sport-hunted elephant trophy taken by Scott Limmer. Mr. Limmer hunted with professional hunter Johan Calitz and operator African Field Sports (Pty) Ltd (AFS) in Controlled Hunting Area (CHA) NG41 of Botswana in 2021.

## **National Status and Management**

The Botswana Government reopened controlled hunting in 2019, initially issuing quotas for 2020 but postponed the reopening and rolled forward the quotas until April 6, 2021 due to the COVID-19 Pandemic. As a corollary to reopening elephant hunting Botswana completed a number of beneficial management instruments that will advance and further secure the survival of elephant.

Botswana has completed a new National Elephant Management and Action Plan. This replaces the country's dated 1991 Management Plan.

The Botswana management authority, the Department of Wildlife and National Parks (DWNP) of the Ministry of Environment, Natural Resources, Conservation and Tourism (MENT), has also completed an up-to-date elephant NDF with 2 annexes, including information addressing how controlled hunting in Botswana provides enhancement of survival of elephants, attached.

One of the addendums to the NDF applies the IUCN SSC *Guiding Principles on Trophy Hunting as a Tool for Creating Conservation Incentives* (often cited by USFWS as useful indicators of benefits of regulated hunting), to Botswana's evolving elephant hunting which demonstrates the benefits of regulated safari hunting.

The National Management Plan creates the position for a National Elephant Coordinator, who has already been appointed. The National Elephant Coordinator will co-ordinate elephant management in Botswana and work with a National Elephant Committee formed by representatives of communities, private landowners, safari operators, NGOs, and independent researchers.

Together with the new National Management Plan, the DWNP has also approved the Priorities and Budget for the first year of its implementation.

At the onset of the re-opening of controlled hunting, DWNP also adopted *Hunting and Escort Guidelines 2019*, streamlining all the due processes before, during and after each hunt along with the functions and role of the DWNP Escort Guides, which are mandatory for each hunt. Furthermore, the Guidelines includes reporting forms for elephant hunts that are an important monitoring and evaluation tool. Interestingly, those Guidelines provide that controlled hunting will take place in areas where there will be no adverse effects on photographic tourism, page 6.

Botswana's elephant hunting re-opened after an extensive, country-wide public consultation process. After an imposed five-year moratorium on hunting, a review began in 2018 with the selection of a Cabinet Sub-Committee on Hunting Ban Social Dialogue. The review included a national year-long process of consultative meetings with community members, local authorities, and stakeholders that culminated with the overwhelming decision to re-open controlled hunting. See the attached documents "Media Statement on the re-opening of hunting", and the Declaration of open season on hunting. The participatory process itself should serve to further motivate and incentivize elephant conservation.

Botswana's elephant population has grown to be the largest in the world. It is secure and stable or growing.

### **Specific Area Management**

The Controlled Hunting Area (CHA) in question, NG41, is a Community Managed Area (CMA) leased to a Community Based Organization (CBO), the Mababe Zokotsama Community Development Trust (MZCDT). See pages 29 to 32 of the NDF for an explanation of the 4 kinds of areas areas/quotas in Botswana.

A CBO is a "registered and legal entity" (RALE) formed by a community to represent the community's interest and implement their management decisions. A community refers to a diverse group of people with varied socio-economic interests and capabilities sharing an interest in conservation and living within a legally defined geographic area.

CMAs are planned around protected areas (National Parks, Game Reserves and Sanctuaries) and are allocated to existing settlements found in those areas. Communities living in, or immediately adjacent to, these CHAs are able to lease them from the respective Land Authorities in order to improve their standard of living by using and managing natural resources contained therein in such a way that local people benefit through increased incomes.

The attached Operator Enhancement Questionnaire (Annex 1) explains the management practices and benefits of the legal arrangement between the CBO and the Hunting Operator.

### **Operator Company Profile**

Johan Calitz started hunting professionally in 1979 and in 1989 he became involved with professional hunting in Botswana developing the largest trophy hunting business in Botswana and managing seven hunting camps in five concessions until the closure of hunting in 2013. He formed African Field Sports (Pty) Ltd (AFS) in 1999 and has been the Managing Director since that time.

## **Operator Enhancement**

### *Community Participation and Collaboration*

Johan Calitz has successfully maintained Joint Venture Partnerships with the communities of NG/32 (24 years), NG/34 (11 years) and NG/41, the community herein, (20 years). The Joint Venture Partnership with the Mababe community commenced in 2002. In June 2009 the MZCDT became shareholders in the photographic camp Mogotlho Lodge in NG41 and is in a co-management / partnership to date. MZCDT also manages their own community camp sites within the CHA, offering camping facilities to tourists. The company policy, in agreement with the MZCDT, is to employ community members in the hunting and photographic operations as far as possible. Due to the company's successful training program of local people over the past 20 years, only a limited number of people employed are from outside the community.

Johan believes that all members of the local community should receive benefits from wildlife and other natural resources for community-based conservation to succeed. African Field Sports worked with the MZCDT to ensure that the funds paid to MZCDT for the use of the concession and the hunting quota were used to improve the lives of the community. Key areas targeted included sponsorship for the local soccer team, the cultural dance group, support for the elderly and funeral support. The funds are also used for the daily operation of the Trust and Trust offices. See attached community documents.

### *Meat Benefits*

African Field Sports also delivers the elephant and game meat from the hunting to Mababe village for community members.

### *Poaching Control*

The years that the hunting was closed the community did not employ the ten community game scouts. Now that hunting is reopened the ten community game scouts are again employed and engaged.

### *Habitat Improvement Enhancement*

Since African Field Sports became the incumbent in CHA NG41, seven boreholes have been provided, as part of the community and environmental / management commitment. The natural pan system within the concession retains water until mid-July, resulting in large numbers of wildlife concentrating on key water points. Rains normally start mid-December, at which time wildlife disperse again to find water in the natural pan system. Boreholes are drilled using a variety of methodologies: compression/air drills used to go to great depths and "stamper rigs" which are a more traditional method used for shallow holes. Since the depth of water sits at more than 50 m in the NG41 system, compression drills are used. Water outlets need to be disguised in a variety of ways to prevent elephant in particular from digging up pipes searching for fresh water: in some cases, deep water troughs are built with concrete and pipes buried deep into the concrete. Elephant will dig holes around a water outlet to find fresh water, which is preferable to older water contained in the pan.

The mobilization, drilling and maintenance costs of each borehole is carried by AFS throughout the year: costs of maintaining boreholes in these remote, largely inaccessible areas are very high, as elephant damage is a regular occurrence and pumps need to be maintained and fueled. The current development cost per borehole is BWP100,000 for drilling, depending on depth, and BWP50,000 – BWP70,000 for a solar pump system.

Supplying water to wildlife at two water points in 2013 cost P60,000 per month for fuel. Water provision to

wildlife stopped after the 2013 hunting season, when hunting closed. Boreholes are being made operational again in 2021 in the late dry season to complement the levels of natural surface water in the area.

The existing road network is maintained and used as firebreaks. Road maintenance was done by AFS in 2021 at a cost of BWP86,587.20 (approx.US\$8,300) in preparation for the 2021 hunting season. Despite the closure of hunting in 2013, AFS collaborated with Dr. Winterbach, an ecologist, to maintain baseline ecological monitoring from 2015 to date.

In summary, the attached import permit application package documents the extraordinary benefits of this applicant's hunt to the long-term survival of Botswana elephant. Of special note is the operator's long term habitat improvements (water holes, fire control, professional ecological monitoring), wildlife monitoring, expert guided community networking, direct meat delivery system, enhanced control of poaching and substantial funding of the Community Based Organization.

If any questions, please feel free to contact me.

Sincerely,



John J. Jackson – President, Conservation Force

CC: Scott Limmer

Enclosed:

- a. Import permit application for an elephant trophy taken in NG41
- b. Notice of Representation
- c. Botswana Hunting Permits
- d. Elephant Hunting Report
- e. Ivory Ownership Certificate - DWNP.
- f. Certification of Elephant Aging
- g. Operator Enhancement Report
- h. Maps for NG41
- i. Mababe Zokotsama Community Development Trust (MZCDT) registration
- j. Mababe Zokotsama Community Development Trust (MZCDT) and African Field Sport Partnership in NG41
- k. Winterbach, Christiaan W., *Tourism Potential of NG/41*
- l. Winterbach, Christiaan W., et al. *Wildlife Abundance and Diversity as Indicators of Tourism Potential in Northern Botswana*
- m. Craig GC, Peake D (2011) *The elephants of northern Botswana, age determinations, age and size of hunting trophies*. Gaborone: Conservation Trust Fund of the Ministry of Environment, Wildlife and Tourism.
- n. Media Statement on the Re-opening of Hunting
- o. Declaration of Opening of Hunting
- p. Elephant Management and Action Plan – 2021-2026
- q. NDF Findings for Botswana elephants
- r. Wildlife Hunting Quota 2020
- s. Wildlife Conservation and National Parks Act 1992
- t. Hunting and Licensing Regulations 2001
- u. Wildlife Policy 2013
- v. CBRNM Policy 2007
- w. Hunting and Escort Guidelines 2019

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  - 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.

- **Complete all questions on the application.**
- **Mark questions that are not applicable with "N/A".**
- **If applying for more than one trophy species, be sure to answer questions 4, 5, and 6 for each trophy.**
- **If importing trophies from more than one country, you must submit a separate application for each shipment in order to obtain separate import permits.**

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

Same as above

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

John Jackson (504) 837-1233 permits@conservationforce.org

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

No  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.

Loxodonta africana

b. Sex (if known).

MALE

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

a. Country and location (e.g., 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 ANIMAL HAS ALREADY BEEN TAKEN**, please include the following:

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

BOTSWANA NG41 near MAUN, BOTSWANA

b. Date wildlife was hunted:

06/11/2021

c. Approximate age of animal:

60 YEARS

d. Name of hunting outfitter, safari company, and/or professional hunter you hunted with:

JOHAN CALITZ SAFARIS and RON CRAUS as PH.

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

Mochaba Developments Ltd (Taxidermy) Private Bag 098 Maun, Botswana

7. Please provide a copy of any applicable foreign government permits, licenses, or tags, 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: Debbie Peake  
Business Name: Mochaba Developments Ltd  
Address: Private Bag 098, Maun  
City: North-West District  
State/Province: Botswana  
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 have hunted when making the required findings, **please include the Operator Enhancement Questionnaire** provided in Annex I filled out by the operator or professional hunter of the concession in which you hunted or will hunt. You may attach an updated report of operations from this concession in lieu of this questionnaire if information regarding the enhancement of the survival or propagation of the species in the wild is made available in the report.
10. If required by the country in which you hunted, please include the government-endorsed hunter return form.  
**See attached**
11. Provide the name of the operator, safari company, or professional hunter with whom you hunted or will hunt.

Name (Company/Professional Hunter): Johan Calitz Safaris/Ron Craus

E-mail: johan@calitzsafaris.com

Phone number: +267 71 559 753

**CERTIFICATION STATEMENT** (original signature must be provided for either 11 or 12 below)



12. **If you are a broker or taxidermist applying on behalf of a U.S. hunter or foreign national**, provide documentation to show you have **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:** \_\_\_\_\_

13. **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**).

**Applicant's signature:** \_\_\_\_\_ **Date:** 11/20/2021

*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.*

14. 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).

† BARON BERTRAND DES CLERS, PH.D.  
† JAMES G. TEER, PH.D.  
† BART O'GARA, PH.D.  
† DON LINDSAY  
† BERT KLINEBURGER

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August 20th, 2021

Department of the Interior  
U.S. Fish and Wildlife Service  
Attn: Chief Mary Cogliano  
Division of Management Authority (DMA)  
Branch of Permits, MS: IA  
5275 Leesburg Pike  
Falls Church, Virginia 22041-3803  
E-File

**Applicant:** Rhett T. McNallie  
**Re:** Import Permit Application for Botswana Elephant Trophies  
**Dates of hunt:** June 29<sup>th</sup> – July 9<sup>th</sup>, 2021

Chief Cogliano,

Enclosed is an import permit application and supporting information for two personal sport-hunted elephant trophies taken by Mr. Rhett McNallie. Mr. McNallie hunted with professional hunter Jeff Rann and operator Rann African Adventures in Controlled Hunting Area (CHA) NG9 of Botswana in 2021.

### **National Status and Management**

The Botswana Government reopened controlled hunting in 2019, initially issuing quotas for 2020 but postponed the reopening and rolled forward the quotas until to April 6, 2021, due to the COVID-19 Pandemic. As a corollary to reopening elephant hunting Botswana completed a number of beneficial management instruments that will advance and further secure the survival of elephant.

Botswana has completed a new National Elephant Management and Action Plan. This replaces the country's dated 1991 Management Plan.

The Botswana management authority, the Department of Wildlife and National Parks (DWNP) of the Ministry of Environment, Natural Resources, Conservation and Tourism (MENT), has also completed an up-to-date elephant NDF with 2 annexes including information addressing how controlled hunting in Botswana provides enhancement of survival of elephants, attached.

One of the addendums to the NDF applies the IUCN SSC *Guiding Principles on Trophy Hunting as a Tool for Creating Conservation Incentives* (often cited by USFWS as useful indicators of benefits of regulated hunting) to Botswana's evolving elephant hunting program which demonstrates the conservation benefits of the hunting.

The National Management Plan creates a National Elephant Coordinator position who has already been appointed. The National Elephant Coordinator coordinates elephant management in Botswana and works with a National Elephant Committee formed by representatives of communities, private landowners, safari operators, NGOs, and independent researchers.

Together with the new National Management Plan, the DWNP has also approved the Priorities and Budget for the first year of its implementation.

At the onset of the reopening of controlled hunting, DWNP also adopted *Hunting and Escort Guidelines 2019*, streamlining all the processes before and after each hunt and the functions and role of the DWNP Escort Guides, which are mandatory for each hunt. Furthermore, the Guidelines include reporting forms for elephant hunts that are an important monitoring tool. Interestingly, those Guidelines provide that controlled hunting will take place in areas where there will be no adverse effects on photographic tourism, page 6.

Botswana's elephant hunting was reopened after an extensive, country-wide public consultation process. After an imposed five-year moratorium on hunting a review began in 2018 with the selection of a Cabinet Sub-Committee on Hunting Ban Social Dialogue. The review included a year long process of national consultative meetings with community members, local authorities, and stakeholders that culminated with the overwhelming decision to re-open controlled hunting. See the attached documents "Media Statement on the re-opening of hunting", and the Declaration of open season on hunting, The National Management Plan and the Elephant NDF. The participatory process itself should serve to further motivate and incentivize elephant conservation.

Botswana's elephant population has grown to be the largest in the world. It is secure and stable or growing.

### **Specific Area Management**

The area in question, NG9, is a Special Elephant Quota Area (SEQ). Botswana's SEQ areas are NG8, NG9, NG11, NG35, CT4, and CT7. See pages 29 to 32 of the NDF for an explanation of the 4 kinds of areas/quotas in Botswana.

Special elephant quotas were allocated in these areas with high incidences of human elephant conflict to limit the interference of elephants in and around human settlements to create an opportunity for communities to benefit from wildlife sustainable utilization. Funds accrued from the auctions of Special Elephant Quota areas are allocated to the Conservation Trust Fund: project proposals are submitted to the CTF and are directed towards Government and community projects within the elephant range. Proposals are also considered at mitigating the impact of COVID-19 on Community Trusts and to resuscitate those Community Based Organizations (CBOs) that were negatively affected by the hunting moratorium from 2014-2019.

In 2020, a special conservation auction of hunting licenses for elephant quota was held by the Ministry of Environment, Natural Resources, Conservation & Tourism (MENT) to raise money for the Conservation Trust Fund (CTF). The Ministry auctioned hunting license packages of 10

elephant for 7 CHAs with high human-elephant conflict. (Incidentally, the auction for one area (CT29) did not take place.) Jeff Rann was the highest bidder in the auction for NG 9 paying the equivalent of approx. \$436,000.00 U.S. Dollars (BWP 4.7 million at 2020 average rate of exchange) for the auctioned elephants in NG9. Due to the COVID-19 Pandemic the hunts were postponed for one season and the packages were increased to 12 elephants by DWNP, adding a further 2 licenses in each area. The funds of the auction accrued to the Conservation Trust Fund (CTF) for the implementation of related community projects and programs. See attachments for details on the auction, invoices, and more about the Conservation Trust Fund.

The hunting season of 2021 in Special Elephant Quota Areas runs from April 6, 2021, to December 31, 2021. The COVID-19 pandemic and one year time constraint has limited operator activities.

### **Operator Company Profile**

Jeff Rann owns and operates African Adventures and Destination South Safaris and has operated in Botswana for over 30 years including during the hunting closure period. His two companies operate leased concession CT1 and Special Elephant Quota Areas CT4 (auctioned at BWP 3.6 million) and NG9 (where applicant Dr. Crawford's hunt occurred). See maps attached. Jeff operates both photographic and hunting areas, but the areas are operated separately by plan.

Jeff has been awarded both the C.J. McElroy and PH of the Year Awards of Safari Club International in recognition of his years of contributions and conservation services to the safari industry. Evidence of his conservation ethic include his founding of the multi-million-dollar *RANN-FORCE LIONS FOREVER TRUST FUND* with Conservation Force and the maintenance of wildlife boreholes in CT1 the full period of years that hunting was closed in that long term lease area.

### **Operator Enhancement**

#### **Community Participation and Collaboration**

Special Elephant Quota Areas like NG9 in this instance are intended to provide community benefits through the Conservation Trust Fund wherein all SEQ area fees are paid.

The initial length of the leases in SEQ areas was one year. One or more of these areas may be motivated to form community trusts but for the current, opening year the quotas for each such area are aimed at injecting potential community forex to reduce the high level of human elephant conflicts.

Despite the above, the current winners of the 2020 auctions are improving relationships with communities living in the Special Elephant Quota areas: since CHA's with SEQ are considered

marginal tourism areas, communities are encouraged to consider funding options through the CTF to finance and develop other wildlife-based projects to supplement local livelihoods.

In NG9 Operator Rann African Adventures (RAA) educated community members about the Conservation Trust Fund and the benefits available to them from the Fund. Rann contracted Professor Mbaiwa, a renowned CBRNM expert, to act as the community liaison with all the communities in or near hunting areas around NG9 and CT4: regular meetings will be held with community leaders to address community/operator partnerships and beneficiation schemes. See the attached CV for Professor Mbaiwa, the contractual agreement between Rann and Professor Mbaiwa, and the minutes of the first community meeting with Professor Mbaiwa held in NG9.

### Meat Benefits

In line with Botswana's Hunting and Escort Guidelines 2019, Rann African Adventures delivers the full body of each elephant taken on quota to the local communities. Jeff designed and had built a special trailer to haul the full, intact body of all elephants taken on quota to the local people. See attached photographs.

The value of meat provided to the community is calculated based on the following:

The value of game meat is equal to ration meat (cooking meat with bones), currently selling for P30/kg.

A conservative estimate of meat harvested from an elephant bull is 1,400 kg, at P30/kg. This is P42,000 of meat per elephant. The meat value of 10 elephants is P420,000. (Equivalent to approx. \$38,000 US Dollars).

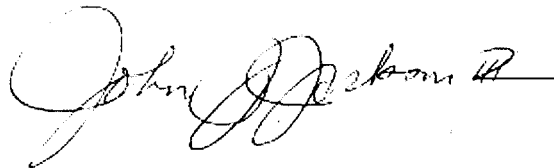
### *Extra Poaching Control*

Aerial Surveillance is an integral adjunct of Rann African Adventure's conservation effort. As an extra measure Rann has contracted a helicopter service at the cost of over \$85,000.00 US Dollars to enhance resource monitoring (including detection and reporting of poaching) in his three areas. The focus is on human activity in the area and will concentrate on areas with pans, major game trails and road networks, as well as marginal areas around the perimeters. The flights will also be used to monitor the ecological health and condition of the area such as water sources, flood levels, fire damage, and monitoring of any active fires. This is in addition to reporting poaching and coordinating with the DWNP and Botswana Defense Forces (BDF) anti-poaching patrols which are conducted year-round. See the attached descriptive information, service contract, and invoice for helicopter services.

In summary, this application package documents the extraordinary benefits of this applicant's hunt to the long-term survival of Botswana elephant. Of special note is the operator's long-term commitment to Botswana and its elephant, aerial surveillance, expert guided community networking, direct meat delivery system, and substantial funding of the Conservation Trust Fund of the Botswana Department of Wildlife and National Parks.

Please contact me if any more information is needed.

Respectfully,

A handwritten signature in black ink, appearing to read "John Jackson". The signature is fluid and cursive, with a horizontal line extending to the right.

John Jackson  
Conservation Force

CC: Rhett T. McNallie  
Jeff Rann

Enclosed:

- a. Import permit application for two elephant trophies taken in NG9
- b. Notice of Representation
- c. Botswana Hunting Permits
- d. Elephant Hunting Reports
- e. Ivory Ownership Certificates
- f. Trophy Documentation and Age Determinations
- g. Operator Enhancement Report
  1. Elephant Trailer Documentation, Specifications, Pricing, and Photos
  2. Aerial Surveillance and Ecological Information
  3. Community Memorandum of Agreement
  4. Community Meetings with Community Liaison and First Meeting Notes
  5. The Elephants of Northern Botswana Age Determination, Age and Size of Hunting Trophies
- h. Maps for NG9
- i. Media Statement on the re-opening of hunting
- j. Declaration of Opening of Hunting
- k. Elephant Management and Action Plan – 2021-2026
- l. NDF for Botswana elephants
- m. Guidelines for the Wildlife Conservation Trust Fund
- n. Wildlife Hunting Quota 2020
- o. Special Elephant Quota Auction and additional quota for 2021 due to COVID-19
- p. Wildlife Conservation and National Parks Act 1992
- q. Hunting and Escort Guidelines 2019
- r. Wildlife Policy 2013
- s. CBRNM Policy 2007

**APPLICANT:**  
**RHETT T. McNALLIE**

**IMPORT PERMIT FOR TWO  
ELEPHANT TROPHIES TAKEN IN  
BOTSWANA**

**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 included in 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 NAMIBIAN SOUTHERN WHITE RHINOCEROS TROPHIES.

**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.

- **Complete all questions on the application.**
- **Mark questions that are not applicable with "N/A".**
- **If applying for more than one trophy species, be sure to answer questions 4, 5, and 6 for each trophy.**
- **If importing trophies from more than one country, you must submit a separate application for each shipment in order to obtain separate import permits.**

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

Rhett McNallie [REDACTED] Denver, Colorado 80230



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

John Jackson (504) 837-1233 permits@conservationforce.org

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

No  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.

Loxodonta africana, African elephant (2 elephants taken)

- b. Sex (if known).

Males

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

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

N/A

- b. Date wildlife is to be hunted:

N/A

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

N/A

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

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

NG9, Botswana

- b. Date wildlife was hunted:

Elephant 1 - July 7th, 2021 Elephant 2 - July 2nd, 2021

c. Approximate age of animal:

Elephant 1 - 36 years, Elephant 2 - 49 years

d. Name of hunting outfitter, safari company, and/or professional hunter you hunted with:

Ran African Adventures Proprietary Limited

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

Mochaba Developments (Pty) Ltd, Private Bag 098, Maun, Botswana

7. Please provide a copy of any applicable foreign government permits, licenses, or tags, 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).

see attached

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: Debbie Peake  
Business Name: Mochaba Developments (Pty) Ltd  
Address: Private Bag 098  
City: Maun  
State/Province: Botswana  
Country, Postal Code: Botswana

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 have hunted when making the required findings, **please include the Operator Enhancement Questionnaire** provided in Annex I filled out by the operator or professional hunter of the concession in which you hunted or will hunt. You may attach an updated report of operations from this concession in lieu of this questionnaire if information regarding the enhancement of the survival or propagation of the species in the wild is made available in the report.

10. If required by the country in which you hunted, please include the government-endorsed hunter return form.  
See attached

11. Provide the name of the operator, safari company, or professional hunter with whom you hunted or will hunt.

Name (Company/Professional Hunter): Jeff Rann  
E-mail: rannsafaris.maun@gmail.com  
Phone number: (830) 426-3476

**CERTIFICATION STATEMENT** (original signature must be provided for either 11 or 12 below)

12. If you are a broker or taxidermist applying on behalf of a U.S. hunter or foreign national, provide documentation to show you have **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: \_\_\_\_\_

13. 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**).

Applicant's signature

Date: 8/27/21

*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.*

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

# CONSERVATION FORCE

A FORCE FOR WILDLIFE CONSERVATION

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December 2, 2021

Department of the Interior  
U.S. Fish and Wildlife Service  
Division of Management Authority (DMA)  
Branch of Permits, MS: IA  
5275 Leesburg Pike  
Falls Church, Virginia 22041-3803  
ATTN: E-PERMITS FILING

<b>Applicant:</b>	Elias Habib Kassab
<b>RE:</b>	USFWS Import Permit Application 3.200.20
<b>Dates of Take:</b>	August 24 <sup>th</sup> , 2021
<b>Species/Country:</b>	Elephant/ Zambia

Good Afternoon,

Enclosed please find an application to import a sport-hunted elephant trophy for Dr. Elias Kassab. Dr. Kassab hunted with Muchinga Adventures in the Chifunda GMA of the Luangwa ecosystem in August of 2021.

In 2015 The Great Elephant Census project sought to create a continent-wide census of elephant populations to achieve an up-to-date picture of the status of all African elephants. In the findings for Zambia, it was reported that there were 22,000 elephants. The aerial results showed the elephant population to be stable and in the two largest elephant landscapes, the Luangwa (where this hunt took place) and the Kafue, the numbers of elephants were increasing (see attached report). Additionally, in 2011 the U.S. Fish and Wildlife Service issued their positive *Enhancement Finding for African Elephants Taken as Sport-hunted Trophies in Zambia during the 2011 hunting season (attached)* and in those findings the FWS reported that "the subsequent importation of personal trophies (was) likely to enhance the survival of the species" in Zambia. Since 2011 Zambia instated a moratorium on safari hunting from 2013 to 2015. Thereafter the country reopened to increase benefits to the communities and to better control poaching.

Muchinga Adventures and Laura and John Du Plooy have been operating the Chifunda GMA concession for 19 years. The GMA borders the North Luangwa National Park and is dense with wildlife, inclusive of an estimated 2000 elephants. Muchinga Adventures has a government lease for the property which requires that they give up to date reports on the hunts for the year, they must maintain an anti-poaching patrol, and they must employ 80% of their staff from the local communities. There are almost 20,000 people living around the Chifunda GMA and beyond employment Muchinga Adventures offers so much to their surrounding community. In 2020 alone during the worldwide COVID pandemic they were still able to meet their obligations of

- Paying the obligatory community pledge of US \$20,500
- Providing bush camp renovations of US \$5,000
- Providing infrastructure development payments

- Anti-poaching K60,000 paid in full
- Offered incentive programs for the recovery of ivory, elephant heads, ammunition etc..
- Meat Distribution, 50% of edible meat delivered to communities
- Donated a community school paid for solely by Muchinga
- Started building a second school in Mapampa Village

Please reference the operator enhancement report, attached, with the additional documents (appendixes) provided from Muchinga Adventures that detail the vast conservation and enhancement commitment that they have made in their GMA and to Zambia. Please also find the Emergency African Covid Relief Pledge that was signed by Muchinga Adventures during the height of the COVID pandemic, where they made a pledge to continue the (1) occupancy of the identified area (2) to control poaching and to (3) continue community stewardship incentives during the 2020 COVID crisis. We must implore that you consider the COVID pledge, and all that Muchinga Adventures was able to achieve for wildlife conservation during the global pandemic as the country may again be facing COVID related upheaval due to the new Omicron variant that was found in Southern Africa.

We have also provided a document entitled, "Provisioning of Game Meat to Rural Communities as a Benefit of Sport Hunting in Zambia" (attached). In this research article the author, Paula White, gives insight into the lease agreements of sport hunting operators with the Zambia Wildlife Authority that require them to annually provide local communities a percentage of the meat obtained through sport hunting free of charge. White quantified the benefits of sport hunting to rural Zambian communities documenting the comprehensive benefits that hunting brings to the area, over and above just money from the hunting itself. It is estimated that about 129,771 kgs of fresh game meat is provisioned annually by the sport hunting industry to rural communities in Zambia at an approximate value of \$600,000 US Dollars. In Zambia, 48% percent of the population were undernourished in 2012-2014, coinciding with the time of the hunting moratorium. Without the addition of game, most Zambian residents would rarely meet the recommended protein requirements and would suffer malnourishment. The dispersal of game meat also detracts locals from poaching to gain a valued source of protein. The positive benefits of sport hunting to Zambia and its people have been lifesaving.

Please refer to the documents and responses included and previously submitted to the DMA by Conservation Force, Zambia's wildlife authorities, professional hunters, and Safari operators when making an enhancement decision for the permit application.

If you have any questions about this import application, please do not hesitate to contact us.

Sincerely,



John Jackson  
Legal Representative – Conservation Force

Cc: Dr. Elias Habib Kassab W/ attachments

Enclosures:

- a. FWS Permit Application Form for Import of Sport-Hunted Trophy
- b. Notice of Representation
- c. Copy of Hunting Permits/Licenses
- d. Operator Enhancement Report
- e. Extended Annexes of Operator Enhancement Report from Muchinga Adventures
- f. Emergency African COVID Conservation Fund Pledge
- g. Enhancement Findings for African Elephants Taken as Sport-hunted Trophies in Zambia during the 2011 hunting season
- h. The Great Elephant Census results – Zambia
- i. Provisioning of Game Meat to Rural Communities as a Benefit of Sport Hunting in Zambia

**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 included in 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 NAMIBIAN SOUTHERN WHITE RHINOCEROS TROPHIES.

**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.

- **Complete all questions on the application.**
- **Mark questions that are not applicable with "N/A".**
- **If applying for more than one trophy species, be sure to answer questions 4, 5, and 6 for each trophy.**
- **If importing trophies from more than one country, you must submit a separate application for each shipment in order to obtain separate import permits.**

1. Name and address where you wish the permit to be mailed, if different from physical address. 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.

Elias Habib Kassab



Dearborn, Michigan 48126

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

John Jackson of Conservation Force (504) 837-1233; permits@conservationforce.org

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

No      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.

Loxodonta africana, African elephant

- b. Sex (if known).

male

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

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

N/A

- b. Date wildlife is to be hunted:

N/A

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

N/A

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

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

Chifunda GMA, Zambia - nearest city is Kasama



b. Date wildlife was hunted: August 24th, 2021

c. Approximate age of animal:

d. Name of hunting outfitter, safari company, and/or professional hunter you hunted with:

Muchinga Adventures

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

Muchinga Adventures Ltd. - B/ 31/ 50A Makeni, Lusaka, Zambia

7. Please provide a copy of any applicable foreign government permits, licenses, or tags, 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: Muchinga Adventures Ltd.

Address: P O Box 390003

Lumumba Road

City: Lusaka

State/Province: Zambia

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 have hunted when making the required findings, **please include the Operator Enhancement Questionnaire** provided in Annex I filled out by the operator or professional hunter of the concession in which you hunted or will hunt. You may attach an updated report of operations from this concession in lieu of this questionnaire if information regarding the enhancement of the survival or propagation of the species in the wild is made available in the report.

10. If required by the country in which you hunted, please include the government-endorsed hunter return form.

11. Provide the name of the operator, safari company, or professional hunter with whom you hunted or will hunt.

Name (Company/Professional Hunter): Muchinga Adventures

E-mail: muchinga2018@gmail.com

Phone number: 260 977 774815

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


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

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

Taxidermist/Broker's signature: \_\_\_\_\_ Date: \_\_\_\_\_

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

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

Applicant's signature:  Date: May 5, 2021

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

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



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

New  Reissue/Renew  Amendment

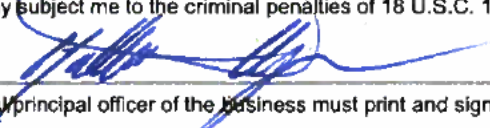


Complete Sections A or B, and C, D, and E of this application. U.S. address may be required in Section C.

<b>A. Complete if applying as an individual</b>			
1.a. Last name <b>JOHNSON</b>	1.b. First name <b>ERIC</b>	1.c. Middle name or initial	1.d. Suffix
2. Date of birth	5.a. Telephone number	5.b. Alternate telephone	6. E-mail address <b>MATT@GENUSLOGISTICS.COM</b>

<b>B. Complete if applying on behalf of a business, corporation, public agency, Tribe, or institution</b>			
1.a. Name of business, agency, Tribe, or institution		1.b. Doing business as (dba)	
2. Tax identification no.	3.a. Description of business, agency, Tribe, or institution		3.b. Website URL (if applicable)
4.a. Principal officer (P.O.) last name	4.b. P.O. first name	4.c. P.O. middle initial	4.d. P.O. Title
5. Primary contact name		6. Primary e-mail address	
7.a. Business telephone number	7.b. Alternate phone no.	8.a. Primary contact telephone no.	

<b>C. All applicants complete address information</b>					
[Redacted], Suite #, or Room #; no P.O. Boxes)					
1.b. City <b>WARREN</b>	1.c. State <b>MN</b>	1.d. Zip code/Postal code <b>56762</b>	1.e. County/Province	1.f. Country <b>US</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	

<b>D. All applicants MUST complete</b>	
1. Include a check or money order, payable to the U.S. FISH AND WILDLIFE SERVICE, a <b>nonrefundable processing fee [50 CFR 13.11(d)(4)]</b> . Federal, Tribal, State, and local government agencies, and those acting on behalf of such agencies, are exempt from the processing fee – <b>attach documentation of fee exempt status as outlined in instructions.</b> (50 CFR 13.11(d)).	
2. If you are requesting a reissue/renew/amendment, what is your permit/file number?	
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. I understand that any false statement herein may subject me to the criminal penalties of 18 U.S.C. 1001.	
 <span style="float: right;">12/9/2021</span>	
The individual/principal officer of the business must print and sign the application. (No photocopied or stamped signatures) <span style="float: right;">Date (mm/dd/yyyy)</span>	

\*\* Further instructions for the above application may be found on our ePermits website. See the last page for information on the Privacy Act, Paperwork Reduction Act, Estimated Burden, and Freedom of Information Act aspects of this application form.

Mall your application(s) to Division of Management Authority, Branch of Permits, MS:IA 5275 Leesburg Pike, Falls Church, VA 22041-3803.

**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 included in 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 NAMIBIAN SOUTHERN WHITE RHINOCEROS TROPHIES.

**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.

- **Complete all questions on the application.**
- **Mark questions that are not applicable with "N/A".**
- **If applying for more than one trophy species, be sure to answer questions 4, 5, and 6 for each trophy.**
- **If importing trophies from more than one country, you must submit a separate application for each shipment in order to obtain separate import permits.**

1. Name and address where you wish the permit to be mailed, if different from physical address. 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.

GENUS LOGISTICS 161-15 ROCKAWAY BLVD SUITE 205 JAMAICA NY 11434

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

MATT MAYERS 718 790 0216 / MATT@GENUSLOGISTICS.COM

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

No  Yes

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

4. For each trophy to be imported, provide:

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

ELEPHANT LOXODONTA AFRICANA

b. Sex (if known).

MALE

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

a. Country and location (e.g., 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 ANIMAL HAS ALREADY BEEN TAKEN**, please include the following:

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

NAMIBIA, MAHANGO NP

b. Date wildlife was hunted: NOV 5, 2020

c. Approximate age of animal: 50

d. Name of hunting outfitter, safari company, and/or professional hunter you hunted with:  
JOFIE LAMPRECHT

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

PRONTO GLOBAL AIR & OCEAN FREIGHT, 3 DIESEL ST, SOUTHERN INDUSTRIAL AREA WINDHOEK  
NAMIBIA

7. Please provide a copy of any applicable foreign government permits, licenses, or tags, 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: J. LAMPRECHT  
Business Name: PO BOX 22755  
Address: WINDHOEK  
City:  
State/Province: NAMIBIA  
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 have hunted when making the required findings, **please include the Operator Enhancement Questionnaire** provided in Annex I filled out by the operator or professional hunter of the concession in which you hunted or will hunt. You may attach an updated report of operations from this concession in lieu of this questionnaire if information regarding the enhancement of the survival or propagation of the species in the wild is made available in the report.

10. If required by the country in which you hunted, please include the government-endorsed hunter return form.

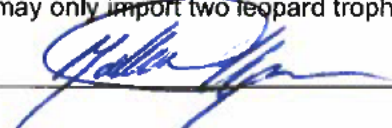
11. Provide the name of the operator, safari company, or professional hunter with whom you hunted or will hunt.

Name (Company/Professional Hunter): J. LAMPRECHT  
E-mail: jofie@jofielamprechtsafaris.com  
Phone number: 264 81 12 98765

**CERTIFICATION STATEMENT** (original signature must be provided for either 11 or 12 below)

12. If you are a broker or taxidermist applying on behalf of a U.S. hunter or foreign national, provide documentation to show you have **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: 12/9/2021

13. 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**).

Applicant's signature: \_\_\_\_\_ Date: \_\_\_\_\_

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

14. 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).

† BARON BERTRAND DES CLERS, PH.D.  
† JAMES G. TEER, PH.D.  
† BART O'GARA, PH.D.  
† DON LINDSAY  
† BERT KLINEBURGER

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December 17, 2021

Department of the Interior  
U.S. Fish and Wildlife Service  
Division of Management Authority (DMA)  
Branch of Permits, MS: IA  
5275 Leesburg Pike  
Falls Church, Virginia 22041-3803  
VIA E-PERMITS FILING

**RE: Import Permit Application for Elephant from Namibia**  
**Applicant: David Scott Madden**  
**Date of Take: September 22<sup>nd</sup>, 2021**

Good afternoon,

Enclosed you will find an import permit application for an elephant trophy from Namibia for Mr. David Scott Madden. Mr. Madden hunted in Bwabwata West National Park with operator Hunt Africa Namibia and Professional Hunter, Jacobus H. Pienaar.

Bwabwata National Park is a protected area in northeastern Namibia that was established by merging Caprivi Game Park and Mahango Game Reserve. It is situated in the Zambezi and Kavango East regions, extending along the Caprivi Strip. It is bounded by the Okavango River to the west and the Kwando River to the east. Angola lies to the north and Botswana to the south. The area is an important migration route from Botswana to Angola for African elephant. In the new National Elephant Conservation and Management plan for Namibia, attached, it states that the removal of the southern boundary fence of Bwabwata National Park has been negotiated with Botswana to provide more ease of movement along the elephant corridors and to Maintain and manage KAZA's (Kavango Zambezi Trans frontier Conservation Area) elephants as one contiguous population. In the West region of the park, where this hunt took place, the operator estimates that there are about 2,500 elephants. Bwabwata is an unusual, protected area as about 5,500 people live in the park. The Namibian government involves park residents and neighbors in planning and managing the park.

We have attached the management plan for Bwabwata National Park put out by the Ministry of Environment and Tourism and the Republic of Namibia. In it you will find that the park is effectively managed together with the other North-East Parks (Khaudum, Nkasa Rupara, Mangetti, and Mudumu National Park) to ensure the conservation of important habitats, to safeguard corridors for regional wildlife migration; to provide engines for economic growth in poor rural areas; and to provide access to natural areas for local, regional, and international visitors. As mentioned above, there are thousands of residents that live in the park and through proper management humans and wildlife are now living in a "status quo that offers tremendous benefits to both conservation and rural community development."

In the document "It's not too good to be true – Elephants are thriving in Namibia" (attached) written as a response to the IUCN classification of the African Savannah elephant as "endangered", it states that "in Namibia, elephant numbers are increasing and their range is expanding, a testament to sound long-term conservation policies." Namibia's Ministry of Environment and Tourism (MEFT) has been conducting aerial transect surveys of its elephant populations since 1979. With highly experienced observers and many repeat surveys, it has been possible to predict population trends over time. It has been calculated that the Namibian elephant population has an annual growth rate of 5.36%. "This is biologically realistic, as elephant population growth rates can be as high as 7% under ideal conditions that are rarely met by free-ranging elephants."



As the population of elephants have grown so have the communities of people in Namibia. Managing the human-wildlife relations has been a major success for them. In the document, "The State of Community Conservation in Namibia", the Forward written by the Minister of Environment and Tourism for Namibia, Pohamba Shifeta, states "the sustainability of the conservancy movement hinges on its success and on five critical issues: benefits to communities, good governance and financial management, conservation hunting, wildlife crime, and drought related to climate change." He goes on to state that Conservation hunting is "essential to the economic survival of many communal conservancies." Bwabwata West National Park is home to the Omega village numbering about 1,000 people. In the operator enhancement report provided Hunt Africa Namibia, it details how they contribute money and goods to the Omega people and are contractually obligated to donate 2.5 million Namibian dollars to the local community yearly. As well, they provide game meat totaling about 45 tons a year. The conservation hunting model that Namibia has adopted has proven successful for both wildlife and the communities.

In addition, we have attached the new Elephant Conservation and Management Plan for Namibia, where it reiterates that "Namibia's elephant population is increasing, and elephant distributions ranges are expanding. (1)" Chapter 7 details at length how Conservation hunting is managed and necessary for the survival of the species. Hunting quotas are monitored and strictly maintained and have allowed for the growth of the elephant population.

Please refer to the documents provided along with the numerous documents and responses previously submitted to the FWS by Conservation Force, Professional Hunters, Operators and Professional Hunting Organizations, as well as information submitted by the government authorities of Namibia in making a positive enhancement determination for this import.

If you have any questions about this import application, please do not hesitate to contact us.

Sincerely,



John Jackson  
Legal Representative - Conservation Force

Cc: Mr. David Scott Madden. W/ attachments

Enclosures:

- a. FWS Permit Application Form for Import of Sport-Hunted Trophy
- b. Notice of Representation
- c. Hunting permits
- d. Operator Enhancement Report
- e. Bwabwata National Park Management Plan
- f. The State of Community Conservation in Namibia
- g. "It's not too good to be true – Elephants are thriving in Namibia
- h. National Elephant Conservation and Management Plan for Namibia (2021)

**APPLICANT:**  
**DAVID SCOTT MADDEN**

**IMPORT PERMIT APPLICATION**  
**3.200.20 (ELEPHANT)**  
**SECTION "E"**

**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 included in 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 NAMIBIAN SOUTHERN WHITE RHINOCEROS TROPHIES.

**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.

- **Complete all questions on the application.**
- **Mark questions that are not applicable with "N/A".**
- **If applying for more than one trophy species, be sure to answer questions 4, 5, and 6 for each trophy.**
- **If importing trophies from more than one country, you must submit a separate application for each shipment in order to obtain separate import permits.**

1. Name and address where you wish the permit to be mailed, if different from physical address. 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.

David Scott Madden [REDACTED] Minden, LA 71055

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

John Jackson or Aimee Korver of Conservation Force (504) 837-1233 or [permits@conservationforce.org](mailto:permits@conservationforce.org)

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

No  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.

Please see the attached sheet that references the minor incident that took place in Canada.

4. For each trophy to be imported, provide:

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

*Loxodonta africana*, African elephant

- b. Sex (if known).

male

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

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

N/A

- b. Date wildlife is to be hunted:

N/A

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

N/A

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

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

Bwabwata National Park West GPS S 18 12' 16.5" E 021 54' 26.6", Namibia

I was duck hunting in Calgary Alberta Canada approximately 20 years ago. We hunted, harvested, clean/dressed all ducks according to Canadian Game and Fish regulation. Upon reentering the USA we were fined because Canadian law did not require a wing to be left on a duck and US law does require the wing to be left on the duck. We did appear in US Federal Court in Shreveport Louisiana and subsequently we paid a \$125.00 fine, case closed.

b. Date wildlife was hunted: September 22nd, 2021

c. Approximate age of animal: 50-60 years old

d. Name of hunting outfitter, safari company, and/or professional hunter you hunted with:

Hunt Africa Namibia - P.H. Jacobus Hugo Pienaar

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

Quarantine in Namibia

7. Please provide a copy of any applicable foreign government permits, licenses, or tags, 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: Jacobus Hugo Pienaar

Business Name:

Address: P.O. Box 1100

City: Gobabis

State/Province: Omaheke

Country, Postal Code: Namibia

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 have hunted when making the required findings, **please include the Operator Enhancement Questionnaire** provided in Annex I filled out by the operator or professional hunter of the concession in which you hunted or will hunt. You may attach an updated report of operations from this concession in lieu of this questionnaire if information regarding the enhancement of the survival or propagation of the species in the wild is made available in the report.

10. If required by the country in which you hunted, please include the government-endorsed hunter return form.

11. Provide the name of the operator, safari company, or professional hunter with whom you hunted or will hunt.

Name (Company/Professional Hunter): Hunt Africa Namibia

E-mail: kobus@adventure-namibia.com.na

Phone number: 081-124-3299


**CERTIFICATION STATEMENT** (original signature must be provided for either 11 or 12 below)

12. **If you are a broker or taxidermist applying on behalf of a U.S. hunter or foreign national, provide documentation to show you have 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:** \_\_\_\_\_

13. **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** 

**Applicant's signature**

**Date:** Dec 14, 2021

*Be aware that the  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.*

14. 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).

† BARON BERTRAND DES CLERS, PH.D.  
† JAMES G. TEER, PH.D.  
† BART O'GARA, PH.D.  
† DON LINDSAY  
† BERT KLINEBURGER

**BOARD OF DIRECTORS:**  
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CHRISSE JACKSON  
SHANE MAHONEY  
RENEE SNIDER

January 3, 2022

Department of the Interior  
U. S Fish and Wildlife Service  
Division of Management Authority (DMA)  
Branch of Permits, MS: IA  
5275 Leesburg Pike, Falls Church, Virginia 22041-3803

**RE:    Applicant:                    Gregory C. Stabrylla**  
**Species:                        Elephant**  
**Country:                      Zimbabwe**  
**Date of take:                June 7<sup>th</sup>, 2021**  
**Hunting with:                Charlton McCallum Safaris**

Dear Madam/Sir:

Enclosed please find the attached permit application to import an elephant trophy from Zimbabwe for Mr. Gregory C. Stabrylla. Mr. Stabrylla took his elephant on June 7<sup>th</sup>, 2021, in Dande Safari area. This area is operated by Charlton McCallum Safaris (CMS).

The Dande Safari area is a vast and wild landscape of more than 500,000 acres and is home to around 87,000 people in scattered small villages and homesteads. Surrounded by open borders, Dande is vulnerable to ivory poachers crossing over from neighboring Zambia and Mozambique. When Charlton McCallum acquired Dande East they saw the toll that that poaching was taking on the area and the dire future that could be ahead and developed the Dande Anti-Poaching Unit (DAPU). They began to pay salaries (out of their own pockets) to community game scouts, they provided uniforms, GPS, and radio communications systems, and armed them in their efforts to put an end to poaching in the area. In the article, "The Good Fight", it states that "DAPU's initiatives have been remarkable. Since 2010, DAPU scouts have collected more than 5,000 illegal snares and have arrested numerous poachers. These efforts have allowed negative game populations to flourish, and resurgence of wildlife has allowed for hunting to move back into the area" These endeavors have now continued into Dande North as well where they have had similar outcomes. Charlton MacCallum safaris has provided their last quarterly newsletter (attached) that sums up their anti-poaching efforts for 2020. In the Short Fact Sheet on Zimbabwe Elephant Management, attached, it provides that Charlton McCallum Safaris spends on average "\$85,000 a year on anti-poaching." Their forces have directly led to an 80% decline in elephant poaching in the important border region.

Charlton McCallum Safaris is also heavily involved with the local surrounding communities on many levels. First, the overwhelming bushmeat poaching lead to the creation of the DAPU which spawned employment for over 40 local scouts. These employment opportunities provide a substantial amount of money to local villagers in a very impoverished area of Zimbabwe. Scouts also assist in problem animal control for their communities. Second, CMS provides vital protein to the community diet by engaging in a meat-sharing system, giving away meat to locals primarily from elephant hunts. Lastly, CMS was the very first operator in Zimbabwe to go into a joint venture with the communities, sharing a 50% partnership of business with them. In the article, "Community Conservation Success in Zimbabwe's

3240 S I-10 Service Road W, Suite 200, Metairie, Louisiana 70001, USA  
Telephone: (504) 837-1233 • Fax (504) 837-1145 • Email: [cf@conservationforce.org](mailto:cf@conservationforce.org)  
[www.conservationforce.org](http://www.conservationforce.org)



Dande Safari Area” it details how CMS is “deeply involved with the CAMPFIRE programs.” One of the major projects that has been a success are the solar powered boreholes created for a year-round water source. With the current hold on elephant trophies fewer and fewer American hunting tourists are traveling to Zimbabwe costing the community the agreed 36% of all elephant trophy hunting income that is provided by CMS, which over and above the income provides the incentive for community members to preserve wildlife populations for the future.

This operator, along with all others, was heavily affected by the global pandemic of COVID 19 and the devastating effects that the virus and shutdowns had on all tourism businesses. Charlton McCallum Safaris in partnership with Conservation Force, took the African Emergency COVID Relief Fund pledge, agreeing to the following (1) to continue to occupy the identified area (2) to continue to control poaching, (3) and to continue community stewardship incentives during the 2020 COVID crisis. In the 2020 DAPU end of year report it reads that “Obviously with COVID, poor crops, no hunters, and 90% unemployment” they slipped backwards in the numbers of snares picked up through anti-poaching but managed to only have one elephant poached in Dande that they know of.

Charlton McCallum are leaders in wildlife conservation. The documents provided show that hunting revenues mitigate the three primary threats to elephants identified by FWS by creating incentives to secure habitat, protect elephants through extensive anti-poaching, and reduce conflicts through benefits for rural communities

In addition, this year CMS, along with two other safari companies, funded the construction of a primary school and high school in Masoka. Also, the DAPU (Dande Anti-Poaching Unit, run by Charlton McCallum) were the winners of the Ox of Okavango award, presented by the African Professional Hunters Association for exemplary work in wildlife conservation and its habitat.


Lastly, we have attached the article *Zimbabwe to Maintain Must-visit International Hunting Destination Status*, written by Emmanuel Koro, an international award winning independent environmental journalist. Mr.Koro writes “International hunting has emerged as one of the most promising industries whose revenue has great potential to support wildlife and habitat conservation in southern African hunting areas, including Zimbabwe at the same time funding rural infrastructure development. The International hunting benefits have accordingly made rural communities co-existing with wildlife value it more and in turn, continue to see the need to conserve it and its habitat.”

The updated Zimbabwe National Elephant Management Plan (2015-2020) has been submitted to the Fish and Wildlife Service on many applications previously, so we have not provided it, but we ask that you please reference that document to gain the full scope of what the country is doing to manage their most valuable wildlife commodity.

Please, refer to the numerous documents and responses previously submitted to FWS by Conservation Force, professional hunters, operators, and professional hunting organizations, as well as information submitted by the government authorities of Zimbabwe when making an enhancement determination for this import.

If you have any questions regarding this import application, please do not hesitate to contact us at your convenience.

Sincerely,

A handwritten signature in black ink, appearing to read "John Jackson". The signature is fluid and cursive, with a horizontal line extending from the end.

John Jackson  
Legal Representative – Conservation Force

Enclosures:

- Permit application- elephant
- Authorization of Representation
- Hunting Permits
- Map of Hunt Area
- African Emergency COVID Relief Operator Pledge
- DAPU 2020 End of Year Newsletter
- Facebook articles on school build completed by CMS and the Ox of Okavango award
- "The Good Fight" by Sports Afield
- Community Conservation Success in Zimbabwe's Dande Safari Area
- Zimbabwe to maintain must-visit international hunting destination status
- The Zimbabwe Elephant Management Fact Sheet

cc: Mr. Gregory C. Stabrylla (w/enclosures)

**APPLICANT:**  
**GREGORY C. STABRYLLA**

**IMPORT PERMIT APPLICATION**  
**3.200.20 (ELEPHANT)**  
**SECTION "E"**

**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 included in 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 NAMIBIAN SOUTHERN WHITE RHINOCEROS TROPHIES.

**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.

- **Complete all questions on the application.**
- **Mark questions that are not applicable with "N/A".**
- **If applying for more than one trophy species, be sure to answer questions 4, 5, and 6 for each trophy.**
- **If importing trophies from more than one country, you must submit a separate application for each shipment in order to obtain separate import permits.**

1. Name and address where you wish the permit to be mailed, if different from physical address. 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.

Gregory C. Stabrylla - [REDACTED] Bozeman, Montana 59718

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

John Jackson III or the permits division of Conservation Force (504) 837-1233; permits@conservationforce.org

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

No      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.

loxodonta africana, African elephant

- b. Sex (if known).

male

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

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

N/A

- b. Date wildlife is to be hunted:

N/A

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

N/A

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

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

Dande Safari Area - Zimbabwe

b. Date wildlife was hunted: June 7th, 2021

c. Approximate age of animal: 40 +/-

d. Name of hunting outfitter, safari company, and/or professional hunter you hunted with:

Charlton McCallum Safaris - P.H. James Charlton

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

Opping Investments - 14 Yellowwood Lane, Kambanjie, Borrowdale, Harare

7. Please provide a copy of any applicable foreign government permits, licenses, or tags, 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: Afropride Freight Express

Address: 1303 Picnic Park, Waterfalls

City: Harare

Country: Zimbabwe

State/Province:

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 have hunted when making the required findings, **please include the Operator Enhancement Questionnaire** provided in Annex I filled out by the operator or professional hunter of the concession in which you hunted or will hunt. You may attach an updated report of operations from this concession in lieu of this questionnaire if information regarding the enhancement of the survival or propagation of the species in the wild is made available in the report.

10. If required by the country in which you hunted, please include the government-endorsed hunter return form.

11. Provide the name of the operator, safari company, or professional hunter with whom you hunted or will hunt.

Name (Company/Professional Hunter): James Charlton

E-mail: admin1@cmsafaris.com

Phone number: +263 773 681 261

**CERTIFICATION STATEMENT** (original signature must be provided for either 11 or 12 below)

12. If you are a broker or taxidermist applying on behalf of a U.S. hunter or foreign national, provide documentation to show you have **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:** \_\_\_\_\_

13. 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**).

**Applicant's signature** \_\_\_\_\_ **Date:** *01/03/2022*

*Be aware that there may be 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.*

14. 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).

† BARON BERTRAND DES CLERS, PH.D.  
† JAMES G. TEER, PH.D.  
† BART O'GARA, PH.D.  
† DON LINDSAY  
† BERT KLINEBURGER

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January 5, 2022

U. S Fish and Wildlife Service  
Division of Management Authority (DMA)  
Branch of Permits, MS: IA  
5275 Leesburg Pike,  
Falls Church, Virginia 22041  
VIA E-PERMITS

**RE: Import Permit Application – R.S.A. Elephant**  
**APPLICANT: Jeff Austin**  
**DATE OF TAKE: May 24<sup>th</sup>, 2021**

Good Afternoon,

Enclosed please find the permit application to import an elephant trophy from the Republic of South Africa for applicant, Jeff Austin. Mr. Austin hunted with professional hunter Eugene Small in the Mapungubwe Game Reserve in South Africa in May of this year.

The Mapungubwe Game Reserve is within the Mapungubwe National Park, set against the norther border of South Africa, joining Zimbabwe and Botswana. It is an open, expansive savannah landscape at the confluence of the Limpopo and Shashe rivers. This is the land of sandstone formations, mopane woodlands, brooding baobabs, ancient floodplains and unique riverine forests that form a dramatic backdrop for the wealth of animal life - elephant, giraffe, buffalo, white rhino, gemsbok and the more elusive mammals like hyenas, leopards and lions. This area is also part of the Greater Mapungubwe Transfrontier Conservation Area, where cross-border movements of the Tuli elephants occur between South Africa, Botswana, and Zimbabwe. See the attached High Level Panel Report on the status of elephant populations in South Africa.

The elephant population in most of South Africa is steady, but in the areas surrounding the Limpopo region the populations are increasing. We have provided documentation from The Great Elephant Census, the Operator's own reporting based on collar monitoring and observation, as well as the Elephant aerial census of the Central Limpopo River Valley that support the rising number in the elephant populations of that region. The elephant taken in this hunt was aged at 50 years or older and

The Operator of Mapungubwe Game Reserve has provided their enhancement report, attached, which details their anti-poaching endeavors, community investments, and details on hunting revenues. They have operated this Reserve for 24 years and most notably run an orphanage in All Days that provides food, shelter, healthcare, an education to over 150 children from the surrounding areas along with all other enhancement and conservation work done on the Reserve.

Please refer to these documents and the National Norms and Standards for the Management of Elephant in South Africa to see that regulated, science-based hunting with strict quotas is in fact



enhancing the elephant population in this region. Country-wide norms and standards along with the individual conservation work of Safari operators in this area have allowed the elephant populations to flourish. We ask that you consider all documents and information provided when making a determination to issue an import permit for this elephant trophy.

Please do not hesitate to contact us if you have questions about this permit application

*John Jackson III*

A handwritten signature in black ink, appearing to read "John Jackson III", with a stylized flourish at the end.

**CONSERVATION FORCE**  
Chairman and Legal Representative

CC: Jeff Austin

Enclosures:

- import permit application
- Notice of Representation
- Hunting Permits
- Operator Enhancement Report – Mapungubwe Game Reserve
- Elephant Collar Program details
- Rahmqvist Foundation – orphanage details
- The Great Elephant Census- Country by Country
- Elephant Aerial Census of Central Limpopo River Valley
- High Level Panel Report on the Five Iconic Species of South Africa – Excerpt on elephant
- The National Norms and Standards for the Management of Elephants in South Africa

**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 included in 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 NAMIBIAN SOUTHERN WHITE RHINOCEROS TROPHIES.

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**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:

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- 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
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- **Complete all questions on the application.**
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- **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 physical address. 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.

Jeff Austin - [REDACTED] Jacksonville, Texas 75766

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

John Jackson and/or permits division of Conservation Force (504) 837-1233; permits@conservationforce.org

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

No  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.

Loxodonta Africana

- b. Sex (if known).

Male

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

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

N/A

- b. Date wildlife is to be hunted:

N/A

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

P.H. - Eugene Small

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

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

Mapungubwe Game Reserve - South Africa.

- b. Date wildlife was hunted: 5/24/2021
- c. Approximate age of animal: 50 years old
- d. Name of hunting outfitter, safari company, and/or professional hunter you hunted with:

Eugene Small

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

Trophy Pro SA, P. O. Box 548, Modimolle, 0510, Limpopo Province, South Africa, +27-84-515-6909

- 7. Please provide a copy of any applicable foreign government permits, licenses, or tags, 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: Trophy Pro SA  
Address: Farm Donkerpoort  
City: Modimolle 0510  
State/Province: Limpopo Province  
Country, Postal Code: South Africa

- 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 have hunted when making the required findings, **please include the Operator Enhancement Questionnaire** provided in Annex I filled out by the operator or professional hunter of the concession in which you hunted or will hunt. You may attach an updated report of operations from this concession in lieu of this questionnaire if information regarding the enhancement of the survival or propagation of the species in the wild is made available in the report.
- 10. If required by the country in which you hunted, please include the government-endorsed hunter return form.
- 11. Provide the name of the operator, safari company, or professional hunter with whom you hunted or will hunt.

Name (Company/Professional Hunter): Eugene Small  
E-mail: mapungubweeugene@gmail.com  
Phone number: + 0795241633

**CERTIFICATION STATEMENT** (original signature must be provided for either 11 or 12 below)

12. **If you are a broker or taxidermist applying on behalf of a U.S. hunter or foreign national**, provide documentation to show you have **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:** \_\_\_\_\_

13. **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** \_\_\_\_\_)

**Applicant's signature:** \_\_\_\_\_ **Date:** 1-4-22

*Be aware that there may be \_\_\_\_\_ents 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.*

14. 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).

† BARON BERTRAND DES CLERS, PH.D.  
† JAMES G. TEER, PH.D.  
† BART O'GARA, PH.D.  
† DON LINDSAY  
† BERT KLINEBURGER

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December 16, 2021

Department of the Interior  
U.S. Fish and Wildlife Service  
Attn: Chief Mary Cogliano  
Division of Management Authority (DMA)  
Branch of Permits, MS: IA  
5275 Leesburg Pike  
Falls Church, Virginia 22041-3803

**Applicant:** Richard Metzger  
**RE:** Import Permit Application for an elephant from BOTSWANA – NG43  
**DATE of HUNT:** July 7, 2021

Chief Cogliano,

Enclosed is an import permit application for a personal sport-hunted elephant trophy taken by Richard Metzger. Mr. Metzger hunted with professional hunter Frans Van Der Merwe and operator Kwatale Safari Company in Controlled Hunting Area (CHA) NG43 of Botswana this year.

### **National Status and Management**

The Botswana Government reopened controlled hunting in 2019, initially issuing quotas for 2020 but postponed the reopening and rolled forward the quotas until April 6, 2021 due to the COVID-19 Pandemic. As a corollary to reopening elephant hunting Botswana completed a number of beneficial management instruments that will advance and further secure the survival of elephant.

Botswana has completed a new National Elephant Management and Action Plan. This replaces the country's dated 1991 Management Plan.

The Botswana wildlife management authority, the Department of Wildlife and National Parks (DWNP) of the Ministry of Environment, Natural Resources, Conservation and Tourism (MENT), has also completed an up-to-date elephant Non-Detriment Findings (NDF) with 2 annexes, including information addressing how controlled hunting in Botswana provides enhancement of survival of elephants, attached.

One of the addendums to the NDF applies the IUCN SSC *Guiding Principles on Trophy Hunting*

as a *Tool for Creating Conservation Incentives* (often cited by USFWS as useful indicators of benefits of regulated hunting), to Botswana's evolving elephant hunting which demonstrates the benefits of regulated safari hunting.

The National Management Plan creates the position for a National Elephant Coordinator, who has already been appointed. The National Elephant Coordinator will co-ordinate elephant management in Botswana and work with a National Elephant Committee formed by representatives of communities, private landowners, safari operators, NGOs, and independent researchers.

Together with the new National Management Plan, the DWNP has also approved the Priorities and Budget for the first year of its implementation.

At the onset of the re-opening of controlled hunting, DWNP also adopted *Hunting and Escort Guidelines 2019*, streamlining all the due processes before, during and after each hunt along with the functions and role of the DWNP Escort Guides, which are mandatory for each hunt. Furthermore, the Guidelines includes reporting forms for elephant hunts that are an important monitoring and evaluation tool. Interestingly, those Guidelines provide that controlled hunting will take place in areas where there will be no adverse effects on photographic tourism, page 6.

Botswana's elephant hunting re-opened after an extensive, country-wide public consultation process. After an imposed five-year moratorium on hunting, a review began in 2018 with the selection of a Cabinet Sub-Committee on Hunting Ban Social Dialogue. The review included a national year-long process of consultative meetings with community members, local authorities, and stakeholders that culminated with the overwhelming decision to re-open controlled hunting. See the attached documents "Media Statement on the re-opening of hunting", and the Declaration of open season on hunting. The participatory process itself should serve to further motivate and incentivize elephant conservation.

Botswana's elephant population has grown to be the largest in the world. It is secure and stable or growing.

### **Specific Area Management**

The area in question NG43, is a leased concession area. See pages 29 to 32 of the NDF for an explanation of the four kinds of hunting areas/quotas in Botswana.

Leased concession areas (aka commercial concessions) refer to CHAs that are leased to safari hunting companies or photo tourism operators. In the case of commercial CHA's, Government advertises the CHAs available for leasing, and interested parties prepare technical and financial proposals (constituting a management plan) which are submitted to a Technical Advisory Committee (TAC) for review: the successful applicant is approved by the relevant Land Board and a Lease issued by the Ministry of Lands. The technical / management plan specifies planned / proposed improvements for the CHA. All proposed plans and improvements are

subject to a variety of environmental review processes – for example, in the case of building camps/lodges an environmental impact assessment needs to be undertaken and approved through the Department of Environmental Affairs (DEA). Borehole installations need to be approved and registered by the Department of Water Affairs.

NG43 is a commercial Controlled Hunting Area on State land: the initial land use (1998) was multi-purpose, being both hunting and photographic, but after the renewal of the head lease in 2014 for a further 15 years, the land use reverted to non-consumptive tourism. Once the hunting moratorium was lifted in 2020, the DWNP approved a hunting quota for NG43 and an addendum to the Head Lease to include hunting as a land use in NG43.

Allocation of the hunting quota is undertaken by the Department of Wildlife & National Parks (DWNP), and is accessible to the concessionaire only after the management plan has been approved and the incumbent informed of their rights (hunting and photo tourism) to the CHA by the relevant Land Board.

Access to the hunting quota is granted by the DWNP annually, after the quota is declared / published by order through the Government Gazette. Quota is purchased by the operator/company and a Single Game License (SGL) is issued per client by species for a determined period by DWNP, supported by the purchase and issue of a Controlled Hunting Area permit, also determined for a specific period per client.

### **Operator Company Profile**

Kgori Safaris (Pty) Limited is a registered proprietary limited company with a 100% citizen shareholding by Jacob Dickie Nkate (51%) and Jacobus Gerhardus Van Rensburg (49%). Both shareholders are directors. Frans Jacobus Wilhelmus Van Der Merwe, a Botswana resident, is the third director and a licenced full professional hunter.

Kgori Safaris was formed in 1993 by Jacob Nkate and Jim van Rensburg to conduct tourism activities. Jim van Rensburg has been holding a Botswana Professional Hunters License since 1998. In 1998 the company received the lease for NG 43 and developed the entire current infrastructure in the area, including boreholes, fire breaks and access routes, game drive tracks, artificial water points and camps. Tourism facilities consist of a 16-bed photographic lodge and camp sites for tourists, and two 8-bed hunting camps. The lease for NG43 was renewed in 2014 for a further 15-year period.

Kgori Safaris has been operating Mboma boat station (a licensed boating camp) in Moremi Game Reserve since 2001 and obtained a 15-year lease in 2015 for a 24-bed photographic lodge in the community-based concession NG19.

### **Operator Enhancement**



### *Community Participation and Collaboration*

There are no communities living in the concession. However, NG43 lies close to SANKUYO village community: Kgori Safaris has worked with Sankuyo village since starting operations in 1999, ensuring that the community receive tangible and financial benefits from hunting and photographic operations in NG43.

75% of the company's unskilled labour force is from Sankuyo village, situated in CHA NG34 (NG34 is currently a single / photographic use only CHA having converted from multi-purpose use to single purpose use (non-consumptive) as a result of the hunting ban implemented in Botswana). The transfer of skills and training is a key component of the NG43 management plan, and is in line with national labour and training programs. A technical component of the Management Plan for NG43 details Employment, Staff Welfare, and Training & Development conditions and procedures. Attached.

### *Meat Benefits*

As provided by the Hunting and Escort Guidelines 2019, approved by the Government of Botswana in 2019, Kgori Safaris has abided to those Guidelines by directly delivering all the elephant meat to Sankuyo. Specially designed and constructed trailers are used to transport elephant carcasses to Sankuyo village. It should be noted that the community in Sankuyo village are dependent on the meat distribution programme from NG43/Kgori Safaris, since they are no longer a multi-purpose use CHA: the Sankuyo Tshwaragano Management Trust are eager to recall their hunting quota in NG34 (bordering NG43) from DWNP to subsidize the community meat requirements, but also to generate additional revenue from the hunting quota – COVID has negatively impacted photographic tourism, whereas safari hunting tourism has remained resilient.

The value of meat provided to the community is calculated based on the following:  
the value of game meat is equal to ration meat (cooking meat with bones), currently selling for P30/kg.

A conservative estimate of meat harvested from an elephant bull is 1,400 kg, at P30/kg. This is P42,000 of meat per elephant. The meat value of 10 elephants is P420,000. (Equivalent to approx. \$38,000 US Dollars).

### *Habitat Improvement Enhancement*

14 boreholes were drilled in the period 1998 – 2013. Two more boreholes were drilled during 2021 at a cost of BWP100,000 per borehole.

Fire plays an important role in the ecology of the Kalahari system, removing moribund plant

material, initiating new growth through the breaking of seed dormancy, and improving the grazing quality of the area by recycling nutrients. However, its impact is closely linked to fire frequency and to fire type, with higher frequency fires typically having an overall negative impact on a region's ecological integrity through its negative effect on vegetation biodiversity and with hot fires (greater than 2,000 kJ/s/m) affecting tree, shrub and sward (grass) layers compared to cooler fire predominantly only affecting the shrub and sward layer.

A total of 977 km of tracks are maintained in NG43 (See Fig. 1a in the attached Operator Enhancement Report and in the attached Map). Tracks are manually opened at the beginning of the season, removing trees and new shrub growth: annual maintenance of these tracks serve as effective fire breaks within the CHA.

Fire breaks around lodges, campgrounds are regularly maintained as the lodge roof structures are mostly thatch: risk of fire is high, especially in the dry, winter months, so staff are trained to educate clients on appropriate safety procedures and reducing the risk of fires by demarcating non-smoking zones in camp areas.

In summary, the attached import permit application package documents the extraordinary benefits of this applicant's hunt to the long-term survival of Botswana elephant. Of special note is the operator's long term habitat improvements (water holes and fire management), environmental monitoring, and support of Sankuyo village through the direct meat delivery program.

If any questions, please feel free to contact me.

Sincerely,

A handwritten signature in black ink, appearing to read "John J. Jackson" with a stylized flourish at the end.

John J. Jackson Conservation Force

CC: Richard Metzger

Enclosed:

- a. Import permit application for an elephant trophy taken in NG43
- b. Notice of Representation
- c. Botswana Hunting Permits
- d. Elephant Hunting Report

- e. Ivory Ownership Certificate
- f. Certification of Elephant Aging
- g. Operator Enhancement Report
- h. Maps for NG43
- i. Media Statement on the re-opening of hunting
- j. Declaration of opening of Hunting
- k. Elephant Management and Action Plan – 2021-2026
- l. NDF Findings for Botswana elephants
- m. Technical Proposal Kgori Safaris Pty Ltd Chapter 7: Employment
- n. Wildlife Hunting quota 2020
- o. Wildlife Conservation and National Parks Act 1992
- p. Hunting and Licensing Regulations 2001
- q. Wildlife Policy 2013
- r. CBRNM Policy 2007
- s. Hunting and Escort Guidelines 2019
- t. Craig GC, Peake D (2011) *The elephants of northern Botswana, age determinations, age and size of hunting trophies*. Gaborone: Conservation Trust Fund of the Ministry of Environment, Wildlife and Tourism.

**Applicant:**

Richard Metzger

**Import Permit For Elephant  
Trophy Taken In Botswana**

## 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 included in 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 NAMIBIAN SOUTHERN WHITE RHINOCEROS TROPHIES.

**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.

- **Complete all questions on the application.**
- **Mark questions that are not applicable with "N/A".**
- **If applying for more than one trophy species, be sure to answer questions 4, 5, and 6 for each trophy.**
- **If importing trophies from more than one country, you must submit a separate application for each shipment in order to obtain separate import permits.**

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

Same as above

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

John Jackson (504) 837-1233 permits@conservationforce.org

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

No       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.

Loxodonta Africana

b. Sex (if known).

Male

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

a. Country and location (e.g., 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 ANIMAL HAS ALREADY BEEN TAKEN**, please include the following:

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

Botswana, Maun, NG43

b. Date wildlife was hunted:

July 1-7, 2021

c. Approximate age of animal:

36 years old

d. Name of hunting outfitter, safari company, and/or professional hunter you hunted with:

Kwatale Safari Company, Frans Van Der Merwe

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

Mochaba

7. Please provide a copy of any applicable foreign government permits, licenses, or tags, 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).

see attached

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: Debbie Peake  
Business Name: Mochaba  
Address: Private Bag 098  
City: Maun  
State/Province: Botswana  
Country, Postal Code: Botswana

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 have hunted when making the required findings, **please include the Operator Enhancement Questionnaire** provided in Annex I filled out by the operator or professional hunter of the concession in which you hunted or will hunt. You may attach an updated report of operations from this concession in lieu of this questionnaire if information regarding the enhancement of the survival or propagation of the species in the wild is made available in the report.

10. If required by the country in which you hunted, please include the government-endorsed hunter return form.

See attached

11. Provide the name of the operator, safari company, or professional hunter with whom you hunted or will hunt.

Name (Company/Professional Hunter): Kwatale/Frans Van Der Merwe

E-mail: Frans@Kwatale.com

Phone number: 27 820 536 626

**CERTIFICATION STATEMENT** (original signature must be provided for either 11 or 12 below)

12. If you are a broker or taxidermist applying on behalf of a U.S. hunter or foreign national, provide documentation to show you have **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: \_\_\_\_\_

13. 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 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**).

Applicant's signature: \_\_\_\_\_ Date: 12/16/21

Be aware that you may need to obtain approval from the relevant authorities by your local or state governments, as well as requirements of the receiving country, to conduct your proposed activity. While the Service will attempt to assist where possible, it is your responsibility to obtain such approval.

14. 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).